

MATTER 3 : STRATEGIC CORE POLICIES

Matter 3 Strategic Core Policies – including Policy SC1 (Overall approach); Policy SC4 (Settlement Hierarchy); Policy SC5 (Location of Development); Policy SC7 (Green Belt) and Policy SC8 (South Pennine Moors).

Is the Overall Approach and Key Spatial Priorities, the justification for the proposed Settlement Hierarchy, the principles of location of development, the general approach to the Green Belt, for Bradford, and the approach to development proposals in the South Pennine Moors Zone of Influence soundly based, effective, appropriate, deliverable, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with the latest national policy?

3.1 Policy SC1 – Overall approach and key spatial priorities

- a. How does the policy identify appropriate spatial priorities, and where is the justification and evidence?
- b. Does the policy properly consider infrastructure requirements, regeneration implications, and the need for a balanced distribution of development?

2.1 OVERALL APPROACH AND KEY SPATIAL PRIORITIES

We support Policy SC1 B part 2 which refers to managing and spreading the benefits of continued growth of the Bradford economy as part of the Leeds City Region. This aligns with RSS policy LCR1 which specifically referred to transforming the Regional City of Bradford with 'significantly increased growth in economic development, jobs and homes through the renaissance of the city centre, and development and regeneration elsewhere.'

The policy broadly identifies spatial growth and regeneration at SC1 B1 within Bradford Urban Area and we support at B5 the emphasis on Principal Towns and Local Growth Centres – but it doesn't identify appropriate spatial priorities. Beyond these general spatial priorities there is no further strategic spatial breakdown and justification. Such, more detailed clarification and support for spatial priorities would help to create an essential bridge with the Allocations DPD.

The sub elements of Policy SC1 B parts 1 – 11 collectively contribute to an appropriate and balanced strategic approach with the exception of sub policy 7 as interpreted by proposed policy SC8.

The 'enhancement' elements require both investment and development in order to be realised. While there are some environmental constraints there is significant scope for growth if a

MATTER 3: Strategic Core Policies

positively planned approach is adopted. Successful planning is all about achieving a planning balance of the three strands of sustainable development social, environmental and economic. Good planning is all about balancing the achievement of growth whilst mitigating any environmental concerns.

In relation to SC1 B Part 7 – We accept that environmental resources need to be protected and enhanced and it should be understood that this can be achieved via a number of mechanisms including:

- Better management of both habitats and recreational activities
- Appropriate mitigation which does not involve any need to reduce the previously proposed levels of housing and employment development e.g. provision of new countryside recreational facilities and improved habitats as part of a positive and holistic area planning approach.

We consider that Policy SC1 B part 9 (which is linked to Part B7) is contradictory in relation to part 7 and 8 of the policy regarding biodiversity. It would be more appropriate to combine parts 7, 8, and 9 into one positive statement.

b) Infrastructure requirements

Policy SC1 doesn't adequately cover infrastructure – there is no proportionate distribution of infrastructure requirements. There is insufficient detail in subsequent policies on the delivery framework for key regeneration areas.

SC1 Part B 10. As with many Core Strategies, infrastructure requirements have been given insufficient attention and have not been clearly integrated into the spatial dimensions of the Core Strategy strategic policies.

The newly formed Development and Transport Forum (first meeting on 2nd February 2015) discussed various transport related infrastructure funding streams and specific transport works that have either commenced, are about to commence, or are in the pipeline, including projects where funding from the West Yorkshire Plus Transport Fund has enabled their commencement. Reference to the West Yorkshire Plus Transport Fund is found in the Leeds City Region Enterprise Partnership Strategic Economic Plan (March 2014) ('LEP SEP') and highlights that better transport connectivity is the driving force of the LEP SEP with the West Yorkshire plus Transport Fund which is a £1.6billion package of investments over a 10 year period "to release billions of pounds of untapped economic growth and create thousands of new jobs." This recognition of the importance of the required transport schemes unlocking growth and creating new jobs is not apparent in the Core Strategy.

It is not sufficiently clear in the Core Strategy how the level of funding for a range of transport schemes will become available. Whilst Appendix 10 'Spatial Vision and Objectives Expected Outcomes' refers to the contextual indicator of 'excellent public transport and highway systems

MATTER 3: Strategic Core Policies

to increase the level of accessibility within the District' there is no indication or reassurance as to how this will be achieved / delivered other than referring to the Infrastructure Delivery Plan, which identifies a £469.5 million funding gap. The West Yorkshire Plus Transport fund is submitted to the West Yorkshire Combined Authority and Bradford Council closes this gap and further reviews and funds will further narrow the gap.

The Infrastructure Development Plan states on page 120 in relation to transport that:

“Using information available when this report was originally prepared on the number of proposed schemes, and those that are in receipt of committed funding, the current funding gap is £469.5 million for ‘essential’ schemes and £283 million for ‘desirable’ schemes.”

The SEP identifies spatial priorities including the identification of Bradford as a strategic growth centre (along with Leeds, York, Wakefield, Huddersfield and Barnsley, and specifically in Bradford, identifying one of four Strategic Housing Growth Areas falls within the district (Shipley Canal Road corridor).

The RSS Inspectors Report made some references to the growth potential of Bradford:-

- Para 3.67 – “Bradford Council considered that the size and significance of Bradford is played down in the Plan...”
- Para 3.68 states that “we agree Bradford has a significant and crucial role to play in the delivery of economic growth in the City Region. We consider that the significance of this role is somewhat lost in the Plan and particularly in Policy LCR1. Bradford should be better recognised for the potential it can bring to the growth of the City Region.
- Para 4.25 – “It was argued that the importance of Bradford in the Region’s economy has not been adequately recognised in the RSS. We have discussed this in Chapter 9 of this Report, where we agree that the importance of Bradford needs to be emphasised more in the supporting text of the LCR section.”
- Para 10.8 – “Bradford is larger than the other Sub Regional Centres and it has a significant role in terms of regeneration and in its growth potential. Bradford City Council, Bradford Centre Regeneration and Yorkshire Forward all argued Bradford needs a higher status in the hierarchy. Although we do not consider it merits being described as a Regional Centre – even as a joint or partnership centre with Leeds – we do recognise that Bradford has a more significant role than the other Sub Regional Centres in the LCR.”

MATTER 3: Strategic Core Policies

3.2 Policy SC4 Settlement Hierarchy

- a. Is the Settlement Hierarchy for each town and settlement appropriate, effective, locally distinctive, justified and soundly based, and is it positively prepared and consistent with the latest national policy?
 - b. What is the basis of the proposed Settlement Hierarchy, and is it based on up-to-date and reliable evidence?
 - c. Is the status of various settlements (eg, Ilkley, Burley-in-Wharfedale) in the settlement hierarchy fully justified and soundly based); and are the various criteria of each level of the hierarchy appropriate and fully justified?
-

3.2 SETTLEMENT HIERARCHY

We support the key role for Bradford as a city within the City Region. This approach accords with the LEP SEP which identifies that “the growth centres of regional significance are the city and town centres of Bradford, Barnsley, Wakefield, Huddersfield, Leeds, York and Halifax, alongside the Aire Valley Leeds Enterprise zone.” It goes on to state that “The City Region economy needs these places to be vibrant and prosperous if we are to achieve our aims of faster growth and more and better jobs for our residents.”

The primacy in the Settlement Hierarchy is the core urban area – the core City is very important. The regeneration improvements in the City for example the Westfield development, will all help to enhance Bradford’s role in the City Region and the wider region but this needs to be supported with other investment, particularly transport.

Bradford is a very large and diverse district in terms of geography, settlement distribution, environmental qualities and sub-markets. The City has long been recognised as having substantial untapped growth potential. It is the 5th largest metropolitan district in both area and population in England. The 5 West Yorkshire districts are now working much more closely together to achieve growth and investment via:

- a) the LEP, and
- b) a Combined Authority established in March 2014 for the purpose of a co-ordinated approach to transport and economic development. Devolution of finance and powers from Westminster is underway which will enhance the overall role of Bradford and its key constituent settlements.

We support Policy SC4 part A in relation to the Regional City, which aligned with the former RSS Policy LCR1 A part 3 which aimed to ‘transform the Regional City of Bradford with

MATTER 3: Strategic Core Policies

significantly increased growth in economic development, jobs and homes through the renaissance of the city centre, and development and regeneration elsewhere.’

Supporting the role and future balanced growth of the Principal Towns is very important to creating sustainable patterns of travel where development and local service enhancement should be advanced together. This goes back to the point that you can’t enhance a settlement without investment and growth.

Paragraph 3.58 references land supply – this is retrofitting / justifying the reduction in housing provision based on habitat assessment and the Edge Analytics work.

B) There is absolutely no case and no sound planning evidence base for downgrading the Principal Towns of Keighley and Ilkley.

A continuous enhancement of their role is essential in order to meet the challenges faced.

Bingley:

The Council have proposed upgrading of Bingley to Principal Town status. This is supported and is fully justified by:

- Focal role within Airedale and Airedale Regeneration Masterplan
- The relatively recent upgrades to transport infrastructure in the form of the Bingley bypass and the electrification of the Airedale railway line.
- the scale of employment within and close to the town
- the range of services (see also our matter 6B response)

Ilkley:

We support Policy SC4 part B referencing the enhancement of Ilkley... The case for retaining and enhancing Ilkley’s role as Principal Town can be summarised as follows:

- Ilkley has for several decades been the principal settlement and service centre in the Wharfe Valley sub area of Bradford.
- It has a strong range of retail and leisure facilities and local services
- There is a good range of local employment and considerable potential for employment growth related to local investor and entrepreneur interests.
- Johnson Brook are currently preparing an Area Plan for Ilkley which seeks to take a balanced approach to accommodate an appropriate level of growth whilst still being able to protect the environment.
- Ilkley is an important transport hub in Wharfedale sub area.

MATTER 3: Strategic Core Policies

3.3 Policy SC5 – Location of Development

- a. What is the justification for setting the priorities and criteria for locating new development; is it supported by evidence, appropriate and soundly based?
 - b. Does the policy make the appropriate balance between prioritisation of brownfield land, use of brownfield land and windfalls, and greenfield land, and safeguarded land?
 - c. How will sites be assessed and are the accessibility standards inflexible?
-

3.3 LOCATION OF DEVELOPMENT

We maintain our overall objections to Policy SC5, as stated in our response to the Publication Draft. The prioritisation of major brownfield and city centre sites has significant deliverability issues, where such sites often have issues of viability. The Core Strategy does not give sufficient regard to issues of viability. The DTZ report on viability and potential use of CIL has not yet reached a conclusion on the best way forward.

Our previous submissions in relation to Policy SC5 remain valid:

This policy is in our opinion unsound. Giving first priority to brownfield sites is not supported by the NPPF which uses the word “encourage” when referring to brownfield development. There is no basis in the NPPF for holding back greenfield sites on some assumed phased approach.

Given the very high historic percentages of development on brownfield sites in Bradford from 2000 onwards and an array of issues associated with brownfield market delivery it will be difficult to achieve the brownfield targets in the early years of the plan period. We do not seek to reduce these local overall targets in any way insofar as they apply to the whole of the plan period nor do we wish to downgrade the significance of fully utilising brownfield sites wherever possible. However in order to maintain a deliverable five year land supply in Bradford a continuation of greenfield land release will be necessary year on year. Our extensive re-assessments of the deliverable five year land supply in Bradford, working with clients and other consultants demonstrates a continuing problem of achieving delivery over the last seven or eight years and even before this. The current five year supply remains at below 2.5 years.

Consequently this approach is also unsound when tested against the fully comprehensive evidence base including these recent five year land assessments. This type of phased priority approach has been a major contributor to the historic lack of a five year land supply in Bradford and the other districts of West Yorkshire. This has led to a series of appeals where in the great majority release has been supported on the basis of a poor level of deliverable supply.

MATTER 3: Strategic Core Policies

The remaining second, third and fourth priorities are also lacking in justification and evidence based support. Not all greenfield opportunities are within the settlements as there remain some commitments in the form of greenfield allocations in the Replacement UDP which are yet to be implemented. It does not follow in sustainability terms that a greenfield opportunity within a settlement is more sustainable than a Green Belt release for an urban extension. Urban extensions of any scale, particularly those such as Holme Wood, which are in a lower priced market area and require significant infrastructure investment require a longer delivery period and their early release needs to be encouraged if they are to be realised within the plan period. Ranking urban extensions as a fourth priority has no evidential justification and NPPF supports the early consideration and allocation of such proposals.

With regard to the need for and the timing of any Green Belt releases the NPPF has a general presumption in the core planning principles set out at paragraph 17 that the Green Belt around our urban areas will be protected. The Green Belt policy content of the NPPF in paragraphs 79 and 83 is that their key characteristics are their permanence and openness and that once established they should only be altered in exceptional circumstances. This process is addressed through the development plan preparation and Bradford Council have concluded that a significant percentage of Green Belt land will need to be released within the plan period. Given the five year land supply problems and the national guidance requiring the identification of specific developable sites or broad locations for years 6 to 10 of the plan period and where possible years 11- 15 also (paragraph 47 NPPF) it is quite possible in the Bradford context that Green Belt land releases will be justified in the earlier parts of the plan period and in some cases in the first five years in order to achieve a five year supply of housing land where the site location and conditions are capable of delivering a sustainable development outcome.

By definition in the Bradford context larger urban extensions are likely to be in the Green Belt, with the exception of a very small number of remaining safeguarded sites. There is therefore no logic in affording such extensions a fourth priority. The potential for some element of cross stability to inner area/ city centre sites is a further argument for early release of urban extensions.

The accessibility orientated approach contained in part B of this policy has no logical fit or justification in relation to the expressed part A priorities. While the criteria in part B with their accessibility orientated approach to site selection are supported they do not fit with this policy context nor are they the exclusive group of prime site selection criteria. In addition while the best use should be made of existing transport infrastructure and capacity the ability to make and fund future improvements is also a key consideration.

The whole of policy SC5 should be declared unsound and replaced by an appropriate/adapted site selection policy.

MATTER 3: Strategic Core Policies

The adopted Leeds Core Strategy approach to the allocation of sites is contained within Policy H1 (see below) which does not prioritise previously developed land. This is considered to be a more appropriate approach.

POLICY H1: MANAGED RELEASE OF SITES

LDF Allocation Documents will phase¹ the release of allocations according to the following criteria in order to ensure sufficiency of supply, geographical distribution in accordance with Spatial Policy 7, and achievement of a previously developed land target of 65% for the first 5 years and 55% thereafter. Subject to these considerations, phases with the earliest release should be made up of sites which best address the following criteria:

- (i) Location in regeneration areas,
- (ii) Locations which have the best public transport accessibility,
- (iii) Locations with the best accessibility to local services,
- (iv) Locations with least impact on Green Belt objectives,
- (v) Sites with least negative and most positive impacts on existing and proposed green infrastructure, green corridors, green space and nature conservation,

Consideration will be given to bringing forward large sites, of more than 750 dwellings, to facilitate early delivery in the Plan period.

In special circumstances, allocated sites may be permitted to be released in advance of their phasing outlined above, so long as the permitted site delivers infrastructure and housing investment that is needed within Regeneration Priority Programme Areas. In such cases, suitable mechanisms will be agreed to ensure that delivery within the Regeneration Priority Programme Area occurs either before, or in conjunction with the delivery of the permitted site.

The Council will maintain a five year supply (plus appropriate NPPF buffer) of deliverable housing sites through considering release of the subsequent phase or phases of sites to help address the shortfall.

The Framework at paragraph 52 states that “the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.” This approach should be included within Policy SC5.

MATTER 3: Strategic Core Policies

3.4 Policy SC7 – Green Belt

- a. Is the proposed approach to the Green Belt appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy (NPPF; para. 84), particularly in terms of:
 - i. identifying the exceptional circumstances necessary for using Green Belt land;
 - ii. demonstrating the need to promote sustainable patterns of development, including the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (NPPF para. 84)
- b. Whether there should be a full or selective review of the Green Belt, and would such a review be co-ordinated and agreed with neighbouring authorities?
- c. What evidence is available to justify decisions to release particular areas of Green Belt for development?
- d. Should the Green Belt review also include Safeguarded Land?

3.3 GREEN BELT

EXCEPTIONALCIRCUMSTANCES (QN ai):- There are a number of exceptional circumstances which collectively justify a comprehensive review of Green Belt boundaries in the District and these can be summarised as follows:-

1. We agree with the general proportion of the residential requirement which cannot be accommodated within the main urban areas and other settlements (26%) and the national policy imperatives to meet FOAN and achieve growth cannot be realised solely within the urban areas. We agree with the broad distribution of housing and employment within the settlement hierarchy though we put clear arguments for higher requirements which equate to the previous levels of distribution in the Further Engagement Draft of the CS. This approach underlines the need for significant but well planned (in terms of achieving sustainable development) extensions at the urban fringe of settlements. This level of Green Belt release assumes that the plan is able to deliver the maximum proportion of the total requirement distributed to the urban areas of Bradford/ShIPLEY in particular.
2. Certain employment and infrastructure requirements will also need to be provided on land at the urban edge currently designated as Green Belt including for example new schools and business parks due to the land take required, the quality of development

MATTER 3: Strategic Core Policies

needed and the lack of suitable sites within certain urban areas/settlements. Employment sites of necessary building quality and floorplate size require sites which are essentially flat. This means, given the location and current extent of key employment corridors along the M606, the Airedale Corridor and other important locations, including for example Wharfedale require lower valley terrace/bottom locations (avoiding flood zone 3) some need for Green Belt land release. Other smaller and medium sized employment sites can be sourced within the urban areas.

3. The geographical scale of Bradford District, its population size and future growth, the geographical and sub market spread of the settlements in combination support the exceptional circumstances case for a comprehensive review of the Green Belt boundaries. The sub market housing and employment needs of Airedale and Wharfedale for example cannot be ignored if sustainable outcomes and the continuation of an appropriate distribution of growth are to be maintained. Therefore the need for a review is district wide and should not for example just relate to Bradford /Shipley main urban area.

SUSTAINABLE PATTERNS OF DEVELOPMENT (QN aii) :- A key part of ensuring that sustainable patterns of development are achieved in accordance with the total content of the Framework policy is to incorporate suitable criteria into the comprehensive Green Belt review process. The achievement of more sustainable patterns of development can be delivered if town or neighbourhood plans are prepared which aim for an integrated and holistic approach improving homes to jobs linkages, providing essential infrastructure and achieving greenspace and ecological networks which advance the quality of place and the health and wellbeing of the local population. Therefore while broad comparisons of the relative sustainability of development locations needs to be made the criteria used should also allow for the consideration of the capacity to improve all of the sustainable attributes of a settlement. The sustainability appraisal of the CS plan options should be a good starting point for this evaluation of different areas of Green Belt. If the locations being evaluated are significantly beyond the outer Green Belt boundary and do not have a direct association with a settlement recognised in the hierarchy then arguably they should be discarded in a first sieve process.

The Broadway Malayan - Bradford Growth Assessment is part of the base evidence work examining aspects of sustainability required for carrying out a Green Belt Review. It provides an analysis of the relative sustainability of 25 settlements in the district hierarchy though it arguably does not include all sustainability criteria and this needs to be compared with the Sustainability Appraisal of the CS. It also includes an assessment of aspects of the relative sustainability of SHLAA sites and land parcels in the Green Belt within 500m zones of the urban edge. Paragraph 84 of the Framework sets a very broadly based guideline for considering sustainable patterns of development when carrying out a review of Green Belt boundaries. The position in Bradford as described in the preceding paragraphs requires a

MATTER 3: Strategic Core Policies

combination of approaches including channelling growth to the urban areas inside the existing Green Belt boundary and into towns and villages which are inset. It is not a case of either /or.

QN b THE EXTENT OF THE GREEN BELT REVIEW REQUIRED:- We strongly advocate the need for a comprehensive Green Belt review which is supported by the arguments put in response to QN ai), by the Broadway Malayan evidence base and its extent and by the following additional arguments:

- The scale and distribution of the housing and employment land requirements combined with the land take for supporting infrastructure.
- The policy advice at paragraph 85 of the Framework seeks to avoid a situation where Green Belt boundaries have to be reviewed again at the end of the current development plan period.
- The distribution of development to the settlement hierarchy layers identified in the CS and the relative lack of brownfield urban land within several of these settlements further supports the case for the comprehensive review. The housing needs of the populations in those sub markets which are geographically divorced from the main urban area of Bradford cannot realistically be provided for within urban Bradford and Shipley. Those seeking housing/re-housing are likely to preferentially look to relocate in adjacent areas, which may mean in adjacent districts, if adequate provision is not made in the sub market area where the need arises. If these needs are not met in this way the outcomes will not be sustainable.

The policy as worded seems to imply a two stage or two level process which would take longer than a comprehensive one stage review and would be less likely to lead to a balanced outcome.

We consider that it is necessary to undertake a comprehensive Green Belt review as soon as possible and preferably as a precursor to the first detailed identification of potential land allocations. The process and methodology for the comprehensive review should be selected and incorporated into the CS as a clear strategic framework so that all participants in the process understand what is being done and how the policy constraint of Green Belt designation is to be treated and how it fits in the development location and site selection process as a sieve stage which is separate from environmental constraint criteria. The process of removing land from the Green Belt and the identification of new safeguarded land is a key strategic issue that should be thoroughly thought through with sufficient detail in the Core Strategy.

A Green Belt review needs a clear methodology. A recent example of a thorough Green Belt review is the Barnsley MBC Green Belt review. This was undertaken as part of the evidence base informing their draft Local Plan. The below link is to the 'Approach and Method Report.' https://www.barnsley.gov.uk/media/3553252/phase_1_green_belt_review_revised_nov_2014_jhb.pdf

MATTER 3: Strategic Core Policies

Leeds City Council had also proposed a partial review of the Green Belt but following representations the Inspector determined that a comprehensive review was necessary.

The Leeds Inspector's report into the Core Strategy (September 2014) in relation to the Green Belt: - Para. 29 states– "The council acknowledge that the growth planned in the Core Strategy cannot be accommodated without a review of Green Belt boundaries but, as submitted, the Core Strategy only commits the Council to a selective review. This may lead to pressure to release land in the review area when, having regard to the advice in paragraph 85 of the NPPF, there is more suitable land elsewhere. A comprehensive review is also more likely to ensure consistency with the spatial strategy and increase the likelihood that boundaries will not need to be reviewed again at the end of the plan period."

QN C:- This is really a question to be answered by the Council. There is evidence in the growth study and in the overall scale of development needs for strategic land release particularly where this aligns with the delivery of a key piece of infrastructure which serves to meet a wider economic growth requirement and set of benefits.

QN d :- We consider that it is essential that safeguarded land is identified for longer term development needs which prevent the Green Belt boundaries having to be altered again in 10 to 15 years (the end of the proposed plan period). The policy as currently worded at sub para C of SC7 clearly anticipates changes would be needed after 15 years. This approach is contrary to government policy in paragraphs 84 and 85. Paragraph 85 third bullet point makes it clear that the Government conclude that the process of identifying sufficient reserve land should stretch "well beyond the plan period". The number of years' supply of reserve land required and the number of years which boundaries should endure unchanged following a comprehensive review has been subject to much discussion and research over the last 30 to 40 years (see Research by Elson and Kaiserman). Generally there is a consensus that boundaries should endure unchanged for a period of at least 25 years and to an average of around 30 years. This implies a reserve land supply covering a 10 year period beyond the end of the plan period. Few authorities have provided for this and five years supply is considered to be more reasonable by some. Leeds City Council in their Core Strategy allow for "at least 10% of the total land identified for housing" as reserve land and argue that there are flexibilities in the planned supply given the modest level of windfall allowance. In the case of the Bradford planning officers I understand have some concern that they will not be able to identify sufficient land. While we recognise the issues we consider that sufficient land can and should be identified through the land allocations DPD and this should take account of employment and infrastructure requirements.

MATTER 3: Strategic Core Policies

3.5 Policy SC8 – South Pennine Moors

- a. Is the approach towards new development with the South Pennine Moors and their Zone of Influence appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy?
 - b. Is the HRA evidence soundly based and are there any outstanding issues from Natural England?
-

3.5 SOUTH PENNINE MOORS

1. As stated in our main submissions (March 2014) we strongly object to this proposed strategic policy and the way in which it is proposed to apply the policy content to reduce the levels of housing development, and by implication other development including employment land and essential supporting infrastructure, in the Wharfedale and Airedale market sub areas. We conclude that the policy is unsound for a number of reasons as outlined in our main statement and in the following paragraphs.
2. Our evidence is based on our expertise as planning and development consultants including project co-ordination of teams of environmental specialists in plan-making and in relation to specific development projects. Clive Brook (FRTPI), the author of these specific representations and the March 2014 submissions, has lived in Wharfedale and worked on several development projects in the area over the last 38 years. He has lived in Ilkley for the last 12 years and at the southern end of the town adjacent to the SPA for the last 6 years and regularly walks many of the routes referred to in the HRA survey data. We have carefully considered the content of the latest HRA (Dec 2014) and we and some of our clients have co-operated with CEG and their team which includes the expert ecological evidence of Baker Associates. Johnson Brook are currently preparing an Area Plan for Ilkley which has reached an interim draft stage and we are in initial discussions with the steering committee preparing the Ilkley Neighbourhood Plan with a view to achieving joint working. Our aim is to take a balanced approach to achieving the development needs of the town and Wharfedale in the context of fully assessed environmental constraints and opportunities for a positive planning approach including mitigation measures.
3. The policy approach of SC8 as drafted is not consistent with the policy approach and content of the National Planning Policy Framework (the Framework) including:-
 - The overall balanced approach which seeks to create and support sustainable development by integrating all three strands of sustainability in a comprehensive manner.

MATTER 3: Strategic Core Policies

- The key tests for plan-making are set out in the first two bullet points of paragraph 14 of the Framework. Local Plans are to meet objectively assessed needs and to positively seek opportunities to meet those needs “unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or specific policies in this Framework indicate development should be restricted.” Footnote 9 does reference sites protected under the Birds and Habitats Directive.
 - In paragraphs 109, 113 and 114 a positive approach is advocated which seeks to establish “coherent ecological networks that are more resilient to current and future pressures:” and establish criteria based policies for development which affects protected wildlife sites. The Council have not taken the positive and comprehensive approach advocated in the Framework. Paragraphs 165 and 167 provide further national policy advice on the preparation of appropriate environmental assessments and paragraph 167 stresses the importance of incorporating this approach in the early stages of plan preparation. The Council and their consultants seek to apply a precautionary approach via the latest HRA and policy SC8 without justification and strong evidence and put off the important component of producing a long term mitigation strategy advocated in the CS text and in the Framework. They do refer to the need for work and surveys to justify their approach. We have been advised this week that the Council intend to produce an SPD on greenspace and habitat and provision for this is made in the latest version of the LDS. This appears to be a belated attempt to meet the approach required by the Framework.
4. **POSITIVELY PREPARED:-** The derivation and proposed application of this policy has been dealt with in a way which separates it from other key parts of what should be an integrated and positively prepared strategy. The policy as proposed and based on some of the highly questionable evidence contained in the HRA is being used alongside the GVA/Edge Analytics work to retrofit a lower housing requirement figure and lower level of employment land provision. This has emerged in the later stages of preparation of the CS and will result in full objectively assessed needs and infrastructure requirements not being met. Clear evidence has emerged this month on the way in which the Council intend to use this policy approach in the short term even though it has not been adopted and carries little weight in the light of substantial objections. A UDP phase two allocation site at Bingley Road Menston has been refused on two grounds one of which relates to impact on the SPA/SAC and supporting habitat. The decision to refuse was arrived at even though Natural England did not object to the development and sought limited mitigation in the form of informative signposting to aid protection of the SPA/SAC habitat through better understanding.

MATTER 3: Strategic Core Policies

5. JUSTIFIED:- The policy as drafted does not comprise the most appropriate strategy for development in Wharfedale, Airedale and the South Pennine Towns and Villages. A much more positive and clearly expressed policy is required which does not act as a deterrent to much needed development in these areas. This more sensible and deliverable policy approach would be focussed on a coherent and cohesive ecological network, planned mitigation measures at a strategic and local level and greatly enhanced management of the SPA/SAC moorland habitats. The proposed policy is not a reasonable and proportionate response to the issue of protection of the SPA, such supporting habitat as is justified and the collective protection and enhancement of the identified bird species (see also response to Inspector's second question on the evidence base). It is important in this context to examine the consequent impacts of not providing sufficient homes and jobs in these sub areas which will lead to less sustainable solutions in terms of social and economic impacts for individuals, communities and the Bradford wide strategy. For example longer distance commuting will result in un-planned out migration to adjoining authorities and some of those in need of affordable housing in these market areas will be denied access.
6. QUESTION 2- Is the HRA evidence soundly based and are there any outstanding issues from Natural England?

No examination appears to have been undertaken of the alleged incremental impacts arising from the increased household populations which would result from the higher levels of housing distribution previously proposed by the Council. The assessment of current impacts has not been objectively quantified and the evidence presented is based on a number of extrapolations, some of which are derived from other localities including lowland heaths. With regard to recreation impacts the surveys undertaken raise many questions and we have sought (from the planning policy team and the Parks and Recreation Department) to clarify some of the information relationships by requesting details of the survey methodology and analysis. To date we have not been able to access this information and it appears that Urban Edge may have received the raw survey data and made their own interpretation/extrapolation. Alleged impacts via increased traffic and consequent air pollution have not been established with clear supporting evidence. The majority of the development areas being proposed are in the A65 corridor and an assumption has been made that an increment to existing traffic flows generated by new development traffic will add to the level of pollutants in the atmosphere. Again no base level of pollution related to road traffic has been established. No account has been taken of modal shift in new development trips, impacts from new less polluting engines and the evidence being drawn together by the DoT that peak car useage is approaching.

MATTER 3: Strategic Core Policies

Provision of new parkland recreation areas are proposed as part of our Ilkley Area Plan at the eastern and western end of the town with new footpath connections creating a circuit of walks. These new recreation areas with appropriate management and information can take some of the existing pressures off the designated moorland and this approach can be repeated with other new development proposals. Habitat enhancement and management can also be positively incorporated into larger development schemes. Significant mitigation can be provided by improved management of the moorland areas both in relation to the management of habitat and rationalisation and improvement of recreational routes across the moor. The precautionary approach advocated does not have a cumulative basis of strong justifying evidence to support it. There are references throughout the later sections of the HRA of a potential to cause harm or harm may be caused. Comparison with lowland heath habitats is considered to have significant limitations given the differences in scale, topography and bird assemblage.

7. The current negative and precautionary policy should be replaced by a policy requiring the identification and provision of a biodiversity enhancement plan and the incorporation of local ecological networks with supporting management plans as advocated in paragraphs 114 and 117 of the Framework.

APPENDIX ONE

**South Pennine Moors
Visitor Survey 2013**

HELLO, COULD YOU SPARE ME A COUPLE OF MINUTES TO ANSWER SOME BRIEF QUESTIONS REGARDING YOUR VISIT TO THIS AREA TODAY? THIS IS PART OF A STUDY OF VISITOR ACCESS PATTERNS COMMISSIONED BY BRADFORD DISTRICT COUNCIL.

Site ID	
Date	
Time	
Weather conditions	

1. How many people in total, including yourself, are there with you here today for this visit?

IF MORE THAN ONE: How many adults and how many children?

Adults (16+)		1	2	3	4	5	6	7	8	9+
Children (<16)	0	1	2	3	4	5	6	7	8	9+

2. How frequently do you tend to visit this site?

SINGLE CODE ONLY.

Daily	1
2 – 3 times a week	2
Once a week	3
Once a month	4
Sporadically (varies through the year)	5
First visit	6
Don't know	7

3. Do you tend to visit this site at a certain time of the day or week?
If YES, when? *SINGLE CODE PER COLUMN*

	Weekday	Weekend
Before 9am	1	1
9am – 12 noon	2	2
12 noon – 2pm	3	3
2pm – 4pm	4	4
After 4pm	5	5
No particular time	6	6
First visit	7	7
Don't know	8	8

4. Do you tend to visit this area more often at certain times of the year?
If YES, when? *SINGLE CODE ONLY.*

Winter (Dec – Feb)	1
Spring (March – May)	2
Summer (June to Aug)	3
Autumn (Sept – Nov)	4
No	5
Don't know	6

5. From which postcode did you start your journey to reach this site today?

Postcode:
If willing – street name:

7. How did you get here? *SINGLE CODE ONLY.*
ADD IF NECESSARY: What form of transport did you use?

Car	1
Van	2
Bus/coach	3
Motorcycle	4
Bicycle	5
Horse	6
On foot	7
Other (write in and code 8)	8

8. Did you enter the site from here or from somewhere else?

Entered from this access point	1
Entered from a different access point	2
Don't know	3

9. Where have you walked during your visit to this area today?
SHOW VISITOR AERIAL PHOTOGRAPH and/or MAP AND ANNOTATE COPY.

IF NECESSARY ASK FOR LANDMARKS.

10. What was the main purpose of your visit to this site today? Do you come for any other reasons?

	Main purpose	Other reason
Dog walking	1	1
Walking	2	2
Jogging/running	3	3
Motorcycling	4	4
Bicycling	5	5
Horse riding	6	6
Picnic	7	7
Other (write in code 8)	8	8

11. Do you visit any other places, either heathland or nonheathland, for this same purpose?

IF YES: Could you name the most frequent one or two?

THEN: go to question 12.

IF NO: go to question 16.

IF DON'T KNOW: go to question 16.

12. How far do you typically travel from your home to reach these alternative sites?

<1 mile	1
1-5 miles	2
>5 miles	3

13. How frequently do you tend to visit *these* sites?
SINGLE CODE ONLY.

Daily	1
2 – 3 times a week	2
Once a week	3
Once a month	4
Sporadically (vaies through the year)	5
First visit	6
Don't know	7

14. And how do you travel from your home to reach these other sites?
SINGLE CODE ONLY.
ADD IF NECESSARY: What form of transport do you use?

Car	1
Van	2
Bus/coach	3
Motorcycle	4
Bicycle	5
Horse	6
On foot	7
Other (write in and code 8)	8

15. Are there any qualities, attractions or facilities on offer here that you find particularly appealing, that alternate sites do not offer? Or vice versa? *OPEN Q.*

Named attractions	
This site:	Alternative site(s): please specify name

16. In your opinion, what changes would make this site less attractive to visit?
OPEN Q.

IF NEEDED, PROMPT WITH: being required to keep dog on lead, removal of car park or reduced number of spaces, car park charging, wardening.

--

IF DOGS:

17. Can I just check, how many dogs do you have with you today for this visit?

Dogs/s	1	2	3	4	5	6	7	8	9+
---------------	----------	----------	----------	----------	----------	----------	----------	----------	-----------

18. During your visit, did you let your dog/s off the lead, or did they remain on their leads all the time? *SINGLE CODE ONLY.*

IF MORE THAN ONE DOG: Was that all or some of them you let off the lead?

Let off lead:	
One/all	1
Some	2
On lead/s all time	3
Don't know	4

19. Did you (and/or any of the people with you) go off the main tracks during your visit today, or did you (all) stay on them all the time?

Mostly on main tracks	1
More or less equal	2
Mostly off main tracks	3
Don't know	4

THANK YOU VERY MUCH FOR YOUR TIME TODAY