

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions**

**Made on Behalf of Chartford Homes  
(Representor ID: 437)**

***Matter 3: STRATEGIC CORE POLICIES*****Preamble**

1. On behalf of our client Chartford Homes, 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 makes representations with specific reference to their landholding in Addingham. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
3. Our response to Matter 3, which covers Strategic Core Policies, is contained in this statement. The key issue highlighted by the Inspector is:

**"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 Pennines 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?"**

4. We consider below the specific questions asked by the Inspector:

***Policy SC4 – Settlement Hierarchy***

**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?**

5. Our Client fully supports the inclusion of Addingham within the settlement hierarchy and the identification that it is suitable for new homes. However following the consultation on earlier versions of the plan, the hierarchy has combined the guidance on Local Service Centres (which Addingham is) and Rural Areas, resulting in an emphasis on small scale developments. Whilst this may be relevant to Rural Areas, there is no evidence to demonstrate the amalgamation of the two and the emphasis on small scale development in Local Service Centres.
6. Restrictions on the nature of development in Local Service Centres should not be aligned with Rural Areas, which are clearly separate tiers in the hierarchy and have different characteristics and levels of sustainability. No definition is provided of small scale and the Policy does not preclude large scale development, similarly there is no policy justification to support such a position. It is noted that Policy SC5 makes no reference to Rural Areas within the location of development principles. On this basis, the wording that previously accompanied a tier not proposed for development has been utilised for an area proposed for development as identified in Policy SC5 (1), this is clearly not appropriate.
7. Small scale is not identified and could relate to either the overall allocation to the settlement or the size of individual sites. No restrictions should be placed on the size of any future allocations and such wording could prejudice the most appropriate sites being brought forward in appropriate locations at a later date.
8. Further to this the supporting text to the policy in paragraph 3.75 references that a 'much slower pace and scale of growth...forms the overall approach in these parts of the district' (including Addingham). Given that many of these settlements, including Addingham have been stifled by policy restrictions in recent years there is a clear need for housing now. It is inappropriate to restrict meeting this need, particularly by reducing the pace that this delivery can occur. An identified need is in place at present and needs to be met at present, rather than delayed until later in the plan period.

***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?**

9. The policy states that the Council will allocate sites *“by giving first priority to the re-use of deliverable and developable previously developed land and buildings”*. This policy as worded is unsound as it is inconsistent with national planning policy contained within the Framework. The Framework instead seeks to ‘encourage’ the use of previously developed land (paragraph 17) and our Client believes the policy should be re-worded to read *“by encouraging the re-use of deliverable and developable previous developed land and buildings”*.
10. The approach to previously developed land is perpetuated in Policy HO6, which sets a target for the development of brownfield sites of 50%. Whilst the Framework does allow for Local Planning Authorities to set targets, this must be based on sound evidence. The Council’s own evidence (Local Plan Viability Assessment) identifies viability issues across much of Bradford and its wider District and the SHLAA identified limited opportunities for previously developed land. Our Client is concerned that such a brownfield target will simply exacerbate existing viability issues and will perpetuate the current undersupply of dwellings against current and future housing requirements, whilst stifling the release of appropriate green field sites, which can meet the demands.

**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?**

11. Support is given to the policy provision for Local Green Belt releases to the built up areas of settlements in sustainable locations. Furthermore the acknowledgement of meeting localised need by identifying large scale extensions as the lowest priority is also supported. 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. For example providing a large scale extension to Bradford at the expense of identified need in Wharfedale would be inappropriate. The need for organic growth of individual settlements needs to be considered and identified in the policies.
12. The approach of releasing Green Belt land is consistent with the findings of the land supply contained in the SHLAA, which demonstrates that in order to meet objectively assessed needs in full in locations such as Addingham, there will be a requirement to accommodate a significant proportion of dwellings on land currently identified as Green Belt land.

**c) How will sites be assessed and are the accessibility standards inflexible?**

13. Providing accessibility standards to assist in determining the most appropriate sites for future allocation in principle is considered suitable. However this should be applied in a micro scale to each settlement. Our Client objects to this being a holistic approach across the district comparing sites indifferent settlements as each identified settlement in the hierarchy has its own requirement for new homes.

***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;**

14. The Framework provides a clear delineation between the tests applied to Green Belt development proposed through planning applications (Very Special Circumstances) to those to be applied when land is being proposed for removal from the Green Belt through the plan process, where the test to be applied is that of 'exceptional circumstances' (para 83 of the Framework).
15. The Council have provided an assessment of housing need and established the number of new homes to be provided and a proposed distribution of these homes. Through the evidence base, including the 2013 SHLAA, the Council have demonstrated that it cannot accommodate all of the housing required without incursion into the Green Belt. The new homes proposed are required to meet the accommodation needs of existing and future residents of the district, to support the economic growth of the district and to maintain the vitality and viability of the settlements within the district. These requirements and the lack of available land combine to provide the exceptional circumstances required.

**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 neighbourhood authorities:**

16. The Core Strategy sets out to undertake a selective review of the Green Belt only with boundaries to be set within the Allocations DPD. The Core Strategy demonstrates that there are exceptional circumstances to alter the Green Belt boundary but it does not provide any real guidance upon the location or a methodology for undertaking the revisions.

17. As identified on the key diagram, all but settlements in Wharfedale and Silsden are identified for a Green Belt review. Given the extensive areas identified for Green Belt review it is tantamount to a full review but with the exception of a small number of settlements. There is no evidence to demonstrate why these settlements are excluded and to demonstrate that their housing need can be met without a Green Belt review.
18. With specific reference to Addingham, not having a Green Belt review prejudices the ability to provide the housing needs of the settlement at the stage of the Allocations DPD. Retaining the Green belt boundary around Addingham as proposed significantly limits the opportunities for development to occur, in turn potentially predetermining any sites to be included in the Allocations DPD.

***Policy SC8 – South Pennine Moors***

**a) Is the approach towards new development within the South Pennine Moors and their Zone of Influence appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy?**

19. In assessing constraints the Bradford Growth Assessment (EB/037) 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 HRA is to utilise a 2.5km buffer zone around the SAC/SPA boundary and for this to feed into and inform the distribution established in Policy HO3 and is also policies for determining planning applications in Policy SC8. This approach has led to a reduction in housing to key settlements, including Addingham and utilised as evidence that the housing figure should be reduced and the need for a Green Belt review removed.
20. Further comments are made on this in other representations on the level of homes to be provided within Addingham. However, it is noted that whilst the policy distinguishes between previously developed sites and Greenfield sites it makes no distinction between Green Belt and non Green Belt sites. The Green Belt designation is a land use designation not an ecological designation and as such there is no generic evidence to suggest that non Green Belt sites would have a lesser impact on ecological habitat that Green Belt sites if developed. Without prejudice to our comments in other representations on the inappropriateness of reducing the level of homes provided within settlements affected by ecological constraints, the evidence base provides no evidence that non Green Belt sites are more appropriate in this respect.