

Bradford Core Strategy Development Plan Document Examination

Matter 3 Statement

Prepared on behalf of Countryside Properties (UK) Ltd
February 2015

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Matter 3: Strategic Core Policies

- 2.1 Countryside Properties are in support of the overall Strategic Core Policies and Spatial Vision identified within the Publication Draft Core Strategy.

Policy SC1: Overall approach and key spatial priorities

How does the policy identify appropriate spatial priorities, and where is the justification and evidence?

- 2.2 Countryside Properties have no comments to make in response to this particular question.

Does the policy properly consider infrastructure requirements, regeneration implications, and the need for a balanced distribution of development?

- 2.3 Countryside Properties are in support of Policy SC1 Point 5 which seeks to support, protect and enhance Local Growth Centres and in particular Silsden as a hub for the local economy and housing.

- 2.4 The need to promote additional housing in Silsden, as a Local Growth Centre, is necessary to ensure that future development and infrastructure needs for the borough are met and that the day to day needs of rural communities in the north west of the borough (and beyond) are adequately catered for. Key local infrastructure and services in Silsden will be further supported by the economic benefits that the introduction of new residents will bring, such as additional household expenditure and supporting new jobs in the local area.

- 2.5 By focussing growth through the balanced distribution of growth across the various settlements, Countryside are of the opinion that the policy does consider infrastructure requirements and regeneration implications in the correct manner.

Policy SC4: Settlement Hierarchy

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?

- 2.6 Countryside Properties are supportive of the Settlement Hierarchy outlined with the Core Strategy and the decision to incorporate an additional tier within the Settlement Hierarchy. It is important to distinguish between the larger settlements of the Principal Towns, Local Growth Centres and Local Service Centres so that appropriate levels of growth can be

directed towards settlements, based upon the facilities, services and infrastructure available there (including the potential for delivery of new infrastructure).

- 2.7 In consideration of individual settlements included within the hierarchy, Silsden has excellent links to key transport infrastructure and employment opportunities, a wide range of shopping facilities, is well provided for in terms of health, education and leisure provision and is an attractive place to live. Therefore Silsden's status as a Local Growth Centre is warranted as it can accommodate and sustain a level of growth in excess than the smaller, less sustainable local service centres.

What is the basis of the proposed Settlement Hierarchy, and is it based on up-to-date and reliable evidence?

- 2.8 The proposed Settlement Hierarchy has been based on an up-to-date evidence base. The SHMA and SHLAA updates were recently conducted in 2013 and they have been used to inform the likely unconstrained capacity of development that individual settlements could potentially accommodate.

- 2.9 The Bradford Growth Assessment (2013) was an additional capacity testing exercise that took into account all known constraints which were then used to inform the actual level of development (including Green Belt land) that could reasonably be accommodated within each settlement. Countryside are therefore of the view that a robust approach has been undertaken to firstly establish the role of each settlement and then assess the quantum of development that each settlement can deliver.

Is the status of various settlements (eg, Ilkely, 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?

- 2.10 Countryside Properties are fully in support of Silsden being identified as Local Growth Centre and the evidence base produced by the Council fully justifies its designation.

- 2.11 With reference to the Bradford Retail and Leisure Study (May 2013) the following table sets out the number of retail units within each of the Local Growth Centres and Local Service Centres.

	No of retail and service facilities
Local Growth Centres	
Queensbury	64
Thornton	44
Steeton with Eastburn	9
Silsden	77
Local Service Centres	
Addingham	23
Baildon	65
Burley in Wharfedale	36
Cottingley	13
Cullingworth	12
Denholme	13
East Morton	No data
Harden	9
Haworth	94
Menston	14
Oakworth	8
Oxenhope	No data
Wilsden	15

Data source: 'Table 1: Summary of the facilities in the local centres (August/September 2012)' (Bradford Retail and Leisure Study (May 2013))

- 2.12 The average local centre in Bradford accommodates 33 retail and service units, whereas Silsden contains 77 units and it is clear from the table above that Silsden is particularly well catered for in terms of retail and facility provision and so the evidence can justify its identification as a Local Growth Centre and that it performs the role of a retail destination within the wider rural area it serves.
- 2.13 The 2013 SHLAA has confirmed that Silsden has a more than adequate capacity of suitable land capable of accommodating around 1,592 dwellings and so it is well placed to meet the housing growth aspirations required of a Local Growth Centre.
- 2.14 The Employment Land Review Update report (October 2011) recognises *that "Silsden should be seen as the location of choice for expanding companies to build on the redevelopment which has taken place recently."* Silsden therefore provides opportunities for people to live and work within the same area.

- 2.15 Silsden is also well catered for in terms of healthcare provision, with the Airedale General Hospital located to just 2.5km away in Steeton with Eastburn.
- 2.16 The A629 is a key transport corridor ensuring Silsden is readily accessible to other centres in Airedale area
- 2.17 The site is clearly a well-established centre which plays an important role in the wider communities of Steeton with Eastburn, Addingham, Keighley and in the neighbouring borough of Craven.
- 2.18 Countryside Properties are of the view that the evidence base used to justify Silsden's status as a Local Growth Centre is up to date and justified. The role Silsden plays in with regard to other towns and villages has also been recognised and further justifies Silsden's status as a Local Growth Centre within the Settlement Hierarchy.

Policy SC5: Location of Development

What is the justification for setting the priorities and criteria for locating new development; is it supported by evidence, appropriate and soundly based?

- 2.19 Countryside Properties are supportive of the location of development outlined within Strategic Core Policy 5.

Does the policy make the appropriate balance between prioritisation of brownfield land, use of brownfield land and windfalls, and greenfield land, and safeguarded land?

- 2.20 Strategic Core Policy 5 does not clearly set out the approach towards the release of Safeguarded Land for development. The second priority location for development behind previously developed land in urban areas is "other Greenfield opportunities within the settlements." It needs to be made clear within the policy what constitutes "other Greenfield opportunities" and whether Safeguarded Land forms part of this definition.
- 2.21 Reference is made in Policy HO2 (as briefly referred to in Policy SC5) about Safeguarded Land sites identified in the RUDP, however it needs to be made clear within the actual wording of Policy SC5 what is defined within 'other Greenfield Opportunities'.
- 2.22 Countryside therefore request that the wording in relation to the second priority for locations of development is re-worded to make specific reference to Safeguarded Land.

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

2.23 Countryside Properties have no comment to make in relation to this particular question.

Policy SC7 – Green Belt

Is the proposed approach to the Green Belt appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy (NPPF;P84), particularly in terms of:

- a. *Identifying the exceptional circumstances necessary for using Green Belt land;*
- b. *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; P84);*

2.24 Countryside Properties have no specific comments to make in relation to this matter.

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?

2.25 Countryside Properties are in support of the need to perform a Green Belt Review to ensure that Council can achieve its housing requirements.

What evidence is available to justify decision to release particular areas of Green Belt for development?

2.26 It has been established that there is a need to release a significant amount of land from the Green Belt in order that future housing needs can be met, because with reference to the SHLAA, insufficient land is available within urban areas or on Safeguarded Land to deliver the quantity of housing required.

2.27 A landscape character assessment has been undertaken as part of the Growth Assessment and this has identified those areas that are more sensitive to change and where urbanisation would cause harm to the wider character of the landscape. Sufficient evidence has therefore been made available to justify Green belt release in certain locations of the borough.

Should the Green Belt review also include Safeguarded Land?

- 2.28 Countryside Properties are in support of the Green Belt Review and there is clearly a need for such an undertaking to occur. However, the release and use of Safeguarded Land for development should be prioritised over the release of Green Belt in the first instance and clearly set out within the hierarchy.
- 2.29 Safeguarded Land was identified in the current UDP under Policy SC5 to prevent the need to release Green Belt beyond the plan period and cater for development needs at that time if insufficient land is available. Bradford's future development requirements are such that Safeguarded Land is now a key source of land for new development and bringing it forward for development will help to reduce the amount of land that is required to be removed from the Green Belt.
- 2.30 Silsden is a settlement that is partially surrounded by Safeguarded Land and this is now considered to be essential development land in the context of its role as a Local Growth Centre. Prioritising the release of Safeguard Land in Silsden will help minimise the quantum of land to be released from the Green Belt and protect more sensitive areas in less sustainable locations in the rural area from unwarranted development.