

RESPONSE TO BMDC ITEMS PSF/019 AND PSF/031a

BRADFORD CORE STRATEGY EXAMINATION IN PUBLIC – REPRESENTATIONS BY ENGLISH HERITAGE REGARDING THE LEVEL OF HOUSING PROVISION IN BAILDON –RESPONSE ON BEHALF OF REDROW HOMES

1.0 INTRODUCTION

- 1.1 At the Core Strategy EIP under matter No.6B the Council introduced a proposed plan modification to reduce the housing distribution to Baildon from 450 dwellings during the plan period to 350 dwellings. On behalf of our developer client we stated our verbal objection to this change at the hearing session. This further representation in writing amplifies the reasons why we and our clients are opposed to this change.
- 1.2 In our short verbal objection to this reduction in housing numbers we proposed that the impact of individual sites contained in the up to date SHLAA evidence base document on the World Heritage Site (WHS), its setting and the proposed buffer zone identified by EH should be a clear part of the drafting of the Allocations DPD and should not be dealt with in a precautionary manner in the Core Strategy (CS). This should be dealt with as an area specific site selection criterion related specifically to the WHS as part of the overall site selection criteria assessment. The Council's proposed reduction in housing numbers for Baildon is an unjustified precautionary approach which lacks a detailed evidence base to support any reduction at this stage of the development plan process.
- 1.3 Baildon is a sustainable location for development (see our main representations to the publication draft CS, the Council's settlement study and the Broadway Malyan Growth Study – the latter refers to medium constraints for areas of potential expansion into the Green Belt and includes consideration of the WHS constraint factor).
- 1.4 Baildon makes a very important contribution to the overall housing requirement and its relative sustainability and close proximity to the main urban area of Bradford add to this consideration. This important level of contribution needs to be retained at its full level if it can be demonstrated that individual proposals do not singularly and collectively lead to harm to the setting and appreciation of the WHS.

2.0 OUR INITIAL ASSESSMENT OF THE WHS EVIDENCE BASE AND THE EH REPRESENTATIONS

- 2.1 We totally agree with the "Outstanding Universal Value " of the Saltaire WHS. However in assessing future potential development impacts upon it is important that detailed and accurate assessments are made of potential development impacts and that the scope for mitigation of those impacts is fully taken into account.
- 2.2 We have reviewed Appendix 7 (Evaluation of the setting of the Saltaire WHS- Setting Survey Evaluation 2012) of the Saltaire World heritage Site- Draft Management Plan which we understand is the basis of the EH representations. We have also reviewed an earlier document produced by W S Atkins for the Council entitled Saltaire World Heritage Site – Environmental Capacity Study 2006. Following these reviews we have carried out a preliminary visual appraisal including a general site visit to the buffer zone's northern section to establish the basis for a more detailed landscape and visual appraisal which would be carried out as part of the promotion of a residential allocation of our client's site. We see this approach as applicable to all sites in Baildon which are not entirely visually contained within the existing urban framework of the settlement.

- 2.3 This initial work has demonstrated that the critical zones and viewpoints identified in Appendix 7 have not been defined with sufficient accuracy to make them reliable as a substantiated evidence base for reducing housing numbers at the CS stage of the development plan process.
- 2.4 Little consideration appears to have been given in the EH appraisal to the potential for incorporating mitigation measures as part of the progression of allocation proposals which could both mitigate proposed development impact to an appropriate residual level while at the same time softening/reducing the impact of existing urban development.
- 2.5 Having carefully read the EH objection statement the appraisal it contains is heavily caveated which helps to demonstrate that the required assessment should only be carried out at the detailed stage of site allocation. At paragraph 1.1 the words “might have” are used in relation to impact and at para 1.2 the words “could harm elements which contribute towards the outstanding universal value.
- 2.6 It appears that the Broadway Malyan Growth Study prepared for BMDC as an important part of the evidence base for the housing distribution has incorporated the WHS impact issue into their overall assessment of constraints and finds that green belt release areas are of medium constraint in common with the evaluation of potential Green Belt extensions to many of the settlements within the Bradford hierarchy.
- 2.7 At paragraph 1.3 of their representations EH state that the Council have not demonstrated that the growth proposals for Baildon can be accommodated. This is at least in part a misunderstanding of the current development plan process where a CS is prepared well in advance of the Allocations DPD. This is clearly a matter for full assessment in the preparation of the Allocations DPD.
- 3.0 CONCLUDING STATEMENT:-
- 3.1 It is clear from our initial analysis described above that the specific evidence base available relating to the landscape and visual evaluation of the setting of the Saltaire WHS does not form a sufficiently detailed and reliable evaluation to rule out the potential residential development capacity in available and deliverable SHLAA sites at the Core Strategy stage of the development plan process for Bradford District. The approach taken to date to the evaluation of impact of development on setting is not sufficiently detailed/sophisticated to account for such matters as very localised changes in topography and makes no allowance for potential on and off site mitigation. We respectfully request the Inspector to conclude that this is a matter for further detailed evaluation in the preparation of the Allocations DPD and in the evaluation of SHLAA sites. We would be pleased to co-operate with the Council in the preparation of a clear brief for this additional work.