

**Bradford Local Plan**

**Core Strategy Examination**

**Councils Response to Participants Further Statements  
on Exceptional Circumstances for Green Belt Change  
under policy SC7**

**Date: 29<sup>th</sup> April 2015**

## **Introduction**

- 1.1 The Council set out in its Further Statement PSF020 the exceptional circumstances which justified the change to Green Belt as required by Paragraph 82 of the National Planning Policy Framework (NPPF) . Several participants made further comments on this statement which the council considers below. This statement relates to the following participants further statements:

Ilkley Civic Society (PS/FO74)  
Ben Rhydding Green Belt Protection Group (PS/F076a)  
Tong & Fulneck Valley Association (PS/F079a)  
Ilkley Design group (PS/F080)  
Gordon Dey (PS/F081)

- 1.2 The following addresses further key points only and is not a comprehensive rebuttal of all the points raised by participants in their further statements.

- 1.3 The key issues raised include:

- Exceptional circumstances not demonstrated
- Exceptional circumstances need to be demonstrated on each site
- Not considered impact of meeting needs on green belt
- Approach does not reflect more recent national guidance protecting green belt
- Consideration should be given to reducing the housing requirement to manage impact on green belt

## **Exceptional Circumstances – Housing Need**

- 2.1 The Council considers that the exceptional circumstances for green belt change have been adequately justified with proportionate evidence which reflect the high level nature of the Core Strategy. The Council's Further Statement PS/F020 sets out the clear justification in line with the requirements of NPPF.
- 2.2 The justification relates in particular to the evidence of housing need which needs to be met in full and land supply considerations based on the Strategic Housing Land Availability findings. It is also justified by the evidence gathered within the Bradford Growth Assessment (EB/037) which contributed to the Council's assessment of the ability of the District to accommodate the anticipated scale of change to the green belt in sustainable locations. As noted in the Council's further statement, based on the SHLAA it is anticipated that green belt land releases for around 11,000 dwellings would be required to meet the housing requirement under policy HO1 in full. The council is careful to be clear this is not a target but rather an indication of scale of potential change based on the most up to date evidence. The Growth Study (EB/037) considered the strategic green belt function and sustainability of areas of potential to meet the housing need. While not a comprehensive green belt review it does provide sufficient justification that the scale of green belt change can be met without undermining

the strategic functions of green belt in locations which are sustainable or could be made sustainable through development and supporting infrastructure.

- 2.3 It is contended by the Tong & Fulneck Valley Association that exceptional circumstances need to be demonstrated for each detailed site specific change to green belt. The Council disagrees with this assertion. In the Council's view NPPF paragraph 83 makes clear that the exceptional circumstances relate to the need to review the green belt which has been established. Once those exceptional circumstances have been demonstrated it is then for the plan to put in place policy considerations to guide the choice of change to green belt with regards to the purposes and function of green belt. It is not for each site to demonstrate exceptional circumstances in their own right. In redrawing the green belt boundary to meet the needs under exceptional circumstances the methodology for green belt review as part of the allocations would have regard to guidance in paragraph 85 on determining boundaries and consideration of functions and purpose of green belt.
- 2.4 Policy SC7 provides policy guidance for any green belt change through the site allocations process. Reference is made by Ilkley Civic Society to the SHLAA sites and impact of these sites on Green belt Function. As noted in the Council's evidence, the Core Strategy does not allocate sites or itself change the green belt - this is actioned by the more detailed Allocations Development Plan Document. Policy SC7 provides policy guidance for any green belt change through the site allocations process. Concerns are raised regarding the impact if the SHLAA sites were removed from green belt. In this respect it is important to highlight that the SHLAA does not allocate sites and more detailed work through the allocations stage will consider any changes to green belt and allocation of land for development in line with the Core Strategy policies. It is recognised that any change to green belt will have some impact at the local level. However the Council considers based on the current evidence that the scale of development can be accommodated in a way which would not impact on the strategic function of green belt nor lead to any coalescence of settlements.
- 2.5 At allocations stage the Council will seek to minimise the need for green belt change by considering all suitable and deliverable non green belt land and looking to ensure effective use of land.
- 2.6 Reference is made to the House of Commons Library note on Green belt policy (PS/F045). This reaffirms the preparation of a Local Plan as being the appropriate place for a review of green belt if exceptional circumstances are demonstrated. It also notes that meeting housing need can be an exceptional circumstance for changing green belt if evidenced and justified with regards to objectively assessed need and land supply in a SHLAA. Reference is made to the weight to be given to meeting housing need in context of 5 year supply. It is clear this relates explicitly to consideration of Planning applications which need to demonstrate 'very special circumstances' where it is for development deemed not appropriate to green belt such as housing.
- 2.7 The Ben Rhydding Green Belt Protection Group suggest that the Council reduce the housing requirement of the plan which would in turn theoretically reduce the

need for green belt change. As set out in the Council's evidence to the examination, the Core Strategy has been produced based on robust and up to date objective assessment of need (OAN). There is no justification to reduce the OAN and related housing requirement of the plan. Moreover, if the Core Strategy sought to not plan for the need in full this would result in unmet need which would have to be met elsewhere in adjoining Local planning authority areas. As most adjoining authorities such as Leeds are also having to look to the green belt to meet their needs then a transfer of some of Bradford's housing requirement to such an authority would be likely to simply replace green belt deletions in Bradford for increased green belt deletions in those neighbouring areas. In line with NPPF the Council is seeking to meet its housing need in full and believes it has the justification and evidence to support doing this.

- 2.8 Reference is also made by Ilkley Civic Society to the importance and need to cooperate closely with adjoining Local Planning Authorities on any change to Green Belt with an indication that they believe this has not been done. The Council has already provided evidence on its approach working with other councils ( see Duty to Cooperate Statement – SD/006). This evidence clearly sets out the approach to Green belt and site allocations where it is important to stress that there is ongoing work both on Bradford Local Plan Documents but also adjoining Local Plans (e.g. Leeds site allocations engagement) to ensure the Duty to cooperate is met and planning takes account of cross boundary impacts and strategic issues are fully considered as appropriate to the document.

### **Exceptional Circumstances – Employment**

- 2.9 Reference is made to the harm of release of land for employment in Bradford South East and Ilkley. The Council consider there is sufficient justification to support release of new land from Green Belt to support economic development in key locations across the District to ensure a quality offer for the plan period which cannot be met on non green belt land and in the most appropriate locations. The City Of Bradford and in particular South Bradford is a key location for employment uses and close to the Regional City as well as having good access to wider Leeds City Region. The Bradford Growth Assessment considered the role of green belt around the settlements and the Council consider that there is available land which could be used in appropriate locations which would not prejudice long terms strategic green belt function. The Allocations Development Plan Document will make the detailed assessment and choice of sites in line with an agreed green belt review methodology.