

**Bradford Local Plan**

**Core Strategy Examination**

**Further Statement Relating to Submissions made in  
Response to Council Statement PS/F019 – Amended  
Housing Distribution**

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

## **Introduction**

- 1.1 This statement sets out the Council's response to comments made on the proposed limited changes to the housing distribution as set out in the Council's statement PS/F019.
- 1.2 In particular this further statement relates to the comments made by:
  - Ilkley Design Statement Group - PS/F080
  - N Varley on behalf of Ben Rhydding Green Belt Protection Group – PS/F019aaii - and endorsed by Ilkley Civic Society - PS/F074
  - Johnson Brook on behalf of Redrow Homes – PS/ F077b
- 1.3 The Council's previous statement which proposed modest changes to the housing distribution outlines the specific circumstances which justify the changes. The statement confirms that the Council are confident in the overall approach and underlying principles behind the distribution, but suggest that there have been a number of changes in evidence and circumstance which produce the circumstances necessary for a main modification. These include:
  - To reflect the debate within the Examination hearings about the Habitats Regulation Assessment (HRA) and the related statement of common ground (PS/F014);
  - To reflect the potential need to re-instate Burley In Wharfedale and Menston as Local Growth Centres;
  - To reflect the need for some re-distribution back to those settlements whose housing targets were reduced on the back of the HRA conclusions;
  - To reflect minor adjustments in the light of objections made by English Heritage to the proposed Haworth and Baildon targets;
  - The emerging SHLAA 3 land supply position which shows a shortfall in supply in the settlements of Shipley, Bradford NE and the Canal Road Corridor

## **Response**

- 1.2 In responding to the proposed housing distribution amendments, the Ilkley Design Statement Group have simply re-iterated a number of previously made comments and reasons as to why they consider that the proposed housing quantum in Wharfedale are unsound. Clearly the Council disagrees with the points made but will not re-iterate in full the arguments here as they have been dealt with comprehensively in earlier statements and at the Examination hearings. No logical, coherent arguments have been made by the group to sustain their objections. They continue to fail to acknowledge that there might be any benefit to the town in providing new homes. They fail to acknowledge that there may be – and are – many sustainable locations for development within the green belt.
- 1.4 Mr Varley makes a number of points and again the Council do not intend to re-iterate arguments which have already been made in the Council's earlier statements or at the Examination hearings. However a number of detailed points and clarifications in response to Mr Varley's submission are included below:
  - In his paragraph 4, Mr Varley suggests that the Council have made reductions in the housing targets of 11 settlements between the Further Engagement Draft (CSFED) and Publication Draft Plans but this is slightly misleading. The analysis and tables within the Council's housing background paper merely indicate the relevant factors within each settlement and the notations relate to how the baseline population

proportionate target might be adjusted up or down. A more accurate description of the settlements where the HRA was the main factor in reducing the settlement's housing targets comes within the Council's background Paper 1 (SD/015 ) at page 18 and table 2. The key issue debated with the representatives of CEG at the Examination were whether certain assumptions should have been made about the potential impacts of development on the Special Protection Area (SPA) and as a result whether certain sites should have been removed from the potential land supply to support housing targets within those settlements. As table 2 in Background Paper 1 shows, the only 3 settlements where the discounting resulted in a land supply below the CSFED housing targets were at Ilkley, Burley In Wharfedale and Silsden. It was explained at the Examination that numbers were also reduced at Menston where the land supply situation after discounting was very tight and also at Addingham because the HRA report put a particular emphasis on the potential direct and indirect effects of development on the Rombalds Moor areas of the South Pennines SPA / SAC. These were the settlements where the alleged pressures and impacts on the SPA / SAC were suggested to be greatest and these were therefore the areas where as a result of the flaws in the HRA's analysis there was a need to re-consider the housing targets.

- Again on point 4 of Mr Varley's submission it must be emphasised that reductions in the level of green belt deletions was not the main driver for changing and reducing the housing distribution in the lower tier settlements between CSFED and CSPD. The main factor was a combination of the lower district wide housing target and the increased land supply options, particularly in the main urban areas which allowed for a greater proportion of the housing requirement to be allocated to the Regional City.
- On point 6 Mr Varley asks whether consideration was given to resolving the land supply shortfall and resultant need to reduce housing targets in 3 of the Regional City's sub areas (Bradford NE, Shipley and the Shipley & Canal Road Corridor) by increasing the targets of other parts of the Regional City. In short the answer is no. There would be no sound justification to do so as it would not have resolved the larger issue i.e. that the settlement targets within the Wharfedale settlements had been unjustifiably reduced on the back of a potentially flawed analysis and conclusions within the HRA.
- Finally on point 6 the Council considers that the modest increases in the proposed housing targets for the settlements within Wharfedale can be accommodated in a sustainable way and that there are a number of potential green belt locations which would provide suitable and sustainable local green belt releases. The proposed housing targets and required green belt release could be secured without any danger of coalescence and without harm to the local or strategic functioning of the green belt.

- 1.4 Moving on, the comments made by Johnson Brook on behalf of Redrow Homes who have a direct site specific interest in Baildon, are suggesting that there is no reason or justification for a reduction in the proposed Baildon housing target. The Council disagrees. The Council's proposed change results from the objections made by the national body English Heritage (now Historic England) whose views should be afforded significant weight. English Heritage consider, and the Council concurs, that the Core Strategy's housing targets should not be set at a level which, based on current information on land supply and site options, would lead to the development of sites which could have an adverse impact on the setting of the World Heritage site of Saltaire. Johnson Brook appear to suggest that English Heritage have misunderstood the Local Plans process and that the issue of whether Baildon can accommodate the CSPD proposed target of 450 homes without impact on the World Heritage Site can be left to the Allocations DPD. The Council strongly disagrees with what would appear to be a overly relaxed approach to the World Heritage Site. It should be borne in mind that

Baildon is quite constrained with only limited alternative options and directions where it could grow or accommodate development. As defined within the Core Strategy. Lower Baildon falls within the Regional City with only the area broadly NW of the A6038 (Otley Road) within the Baildon settlement. The Council considers that the approach taken in making a modest adjustment to the proposed housing target is reasonable, proportionate and justified.

- 1.5 It is difficult for the Council to make further comment on the Johnson Brook submissions. Johnson Brook indicate that they have done further survey work since the Examination hearings and have attempted to critically appraise the potential impact / or lack of impact of potential development sites on the World Heritage Site. They make comments on previously produced documents such as the Draft Management Plan and Capacity Study all of which amounts to the submission of substantial new evidence. The current process and timescales for statements relating to Council homework items is not designed for the submission of new evidence and responses to it. Moreover some of the comments made by Johnson Brook include criticisms of the arguments and logic of the English Heritage representations rather than the Council's submission.