

**MATTER 3: REVISED SPATIAL DISTRIBUTION OF DEVELOPMENT**

***(Policy SC5 and associated policies, including Policies BD1, AD1, WD1, PN1 & HO3<sup>1</sup>)***

***The Council proposes to amend the Spatial Distribution and Location of Development in the submitted plan in respect of the Regional City of Bradford (including Shipley & Canal Road Corridor, Shipley and Bradford North-East), Airedale (including Silsden and Baildon), Wharfedale (including Ilkley, Burley-in-Wharfedale and Menston) and South Pennine Towns and Villages (including Haworth).***

***Key issue:***

***Is the proposed revised spatial distribution and location of development appropriate, effective, deliverable, locally distinctive and justified by soundly-based, 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?***

1. We and other respondents on behalf of the development industry have objected to the lack of changes to Policy HO1 and Table HO1 with regard to the overall housing requirement as derived from the Full Objectively Assessment of Need for housing (FOAN). We highlight a significant change in the evidence base for this calculation in the form of a large increase in the net international immigration figures. In their response to these modifications the Council state at paragraph 3.13 that “no new evidence has arisen or further issues been raised through the representations which makes the Councils approach unsound.” (Statement of Consultation and Summary of Representations – March 2016). This is clearly not the case. While we understand that the Inspector will not wish to fully reopen the issues associated with the scale of the housing requirement, it would be helpful to receive clarification that this new evidence will be considered.
2. Throughout this process we have concluded that evidence on the level of the requirement is in excess of 42,100 (a point acknowledged by the council in describing their requirement as “at least 42,100 homes over the period 2013 – 2030.”) We retain our view that the requirement is nearer 47,000 dwellings over the plan period.
3. We have been consistent in our approach to the settlement hierarchy and the distribution of dwellings first to the Regional City of Bradford and then to Principal Towns and Local Growth Centres. In our table below (which is a repeat of our table submitted to the Proposed Main Modification consultation) we set out how we have maintained the spatial distribution and it is clear how our approach fits with the settlement hierarchy.

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<sup>1</sup> including Main Modifications 38-42, 44-47, 51-52; 56; 75-88

Bradford Core Strategy – Examination – Proposed Main Modifications

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4. Our proposed alternative housing distribution accounting for a higher overall housing requirement is shown below:

	Draft Core Strategy	Proposed Main Modifications	Proposed Alternative
Bradford District	42,100	42,100	46,850
<b>Regional City of Bradford</b>	28,650	27,750	28,650
Bradford City Centre	3,500	3,500	3,500
Canal Road	3,200	3,100	3,200
Shipley	1,250	750	1,250
Bradford South East	6,000	6,000	6,000
Bradford North East	4,700	4,400	4,700
Bradford South West	5,500	5,500	5,500
Bradford North West	4,500	4,500	4,500
<b>The Principal Towns</b>	6,700	6,900	7,850
Ilkley	800	1,000	1,250
Keighley	4,500	4,500	5,000
Bingley	1,400	1,400	1,600
<b>Local Growth Centres</b>	3,400	4,900	6,550
Queensbury	1,000	1,000	1,300
Silsden	1,000	1,200	1,650
Steeton with Eastburn	700	700	1,150
Thornton	700	700	1,150
Burley in Wharfedale	----	700	700
Menston	----	600	600
<b>Local Service Centres</b>	3,350	2,550	3,800
Addingham	200	200	275
Baildon	450	350	600
Burley in Wharfedale	200	----	
Cottingley	200	200	275
Cullingworth	350	350	500
Denholme	350	350	500
East Morton	100	100	150
Harden	100	100	150
Haworth	500	400	650
Menston	400	----	
Oakworth	200	200	275
Oxenhope	100	100	150
Wilsden	200	200	275

**a. Regional City of Bradford**

**i. Why has the apportionment of development to the Regional City of Bradford (including Shipley & Canal Road Corridor [3,200-3,100], Shipley [1,250-750] and Bradford North-East [4,700-4,400]) been reduced from 28,650-27,750 dwellings?**

5. We are not entirely clear why the changes have been made in the Regional City of Bradford and consider it is for the Council to answer. The reason given in the Council's Proposed Main Modifications document makes reference to the amendments to "reflect land supply position within the emerging third SHLAA". This requires further explanation. The reasons given for the reduction at Shipley primarily relate to the alleged impact on the setting of the Saltaire World Heritage Site.

**ii. Does the amended distribution of development properly reflect policy constraints (eg. Green Belt), physical constraints, such as flooding, infrastructure, facilities, traffic and transport, heritage, landscape and environment (including the updated HRA), the latest land availability information, and cross-boundary implications?**

6. As stated in our introductory response to Matter 3 we maintain our approach to distribution within the settlement hierarchy and the apportionment to the Regional City and within its market sub areas. We are not aware of any strategic planning reasons for the proposed changes in distribution, which while relatively small in scale do not appear to be justified.

7. While there are no MM proposals for changing the housing distribution to SE Bradford we are aware of the representations made which seek a substantial reduction in the distribution figure with the objections primarily relating to the proposed 2,000 dwelling Strategic Urban Extension (SUE) at Holme Wood. We maintain our full support for the proportion of housing proposed within the plan period for this sub market area. Objectors from the Tong and Fulneck area of Leeds are seeking the removal of this SUE. There is the full potential through the creation of this new market sub area and the SUE to meet the aspirations of policy SC9- Making Great Places. The proposed South East Bradford Access Route (included within the West Yorkshire Plus Transport Fund which is managed by the West Yorkshire Combined Authority) will form a defensible long term boundary to the SUE as well as forming a key strategic highway link between the motorway system to the south east and the Leeds-Bradford International Airport to the north. Improvements to the A650 Tong Street will also help to facilitate development and renewal in this part of SE Bradford by reducing existing levels of congestion. The Holme Wood SUE will help facilitate the regeneration of Holme Wood with some cross-investment into improvements and linkages to the existing community. We have received confirmation that the Combined Authority will provide the funding for the strategic road link. New greenspace networks and parkland will be provided as part of the SUE on both sides of the road link. Together with strategic landscaping the greenspace proposals will assist in the integration of the greenspace networks and new parkland provided by the SUE development with the countryside forming the Tong-Cockersdale parkland to the east.

**iii. *Is the amended distribution of development likely to be deliverable over the plan period, and does it reflect an appropriate balance between brownfield and greenfield land?***

8. We consider that the slightly larger apportionment of development contained in the Publication Draft CS of 28,650 is deliverable in the plan period but this is dependent on the following key actions and full co-operation between landowners, the development industry and the Council alongside full consultation with and involvement of local communities. These key actions can be summarised as follows:-

1. A concerted effort to make more rapid progress on the Allocations DPD with achievement of the earliest possible publication of the final submission draft, and early EIP and subsequent adoption.
2. The early release of both brownfield and greenfield sites with strategic urban extensions and other large housing and mixed use development projects progressing through master-planning alongside the preparation of the Allocations DPD.
3. Full account should be taken of the development industries representations on the Council's phasing proposals for sites with appropriate changes to this policy to speed the release of sites.

**b. Airedale**

**i. *Why has the apportionment of development to the Airedale sub-area (including Silsden [1,000-1,200] and Baildon [450-350]) been increased from 8,350-8,450 dwellings?***

9. The amended apportionment of development to Baildon is a result of concerns raised by Historic England in relation to alleged potential impacts on the setting of the World Heritage Site at Saltaire. Historic England do not provide specific and clear evidence in support of this reduction. We have examined in some detail the landscape and visual inter-relationships and two studies which define and analyse the setting on behalf of the Council. We have also carried out our own LVIA of the setting and the extent to which this might reduce the development capacities of certain identified SHLAA sites. Based on this work it is clear that there is insufficient evidence at this strategic planning stage to justify a reduction in the number of dwellings apportioned to Baildon. Further detailed assessment is necessary at an early stage in the preparation of the Allocations DPD and specific site proposals to justify any reduction. Our distributed figure to Baildon, a very well located and sustainable community close to the main urban area of Bradford with significant housing need and demand is strategically justified. Our site specific work on one of the SHLAA sites already demonstrates, as with other SHLAA sites that the gross dwelling numbers assumed are an over-estimate. If on detailed examination some reduction from our distributed figure is justified we estimate that at least 450 dwellings can be accommodated within this community without significantly adverse environmental impacts.

10. It is assumed that the increase in Silsden from 1,000 – 1,200 is as a result of updated land supply evidence within the third SHLAA, however it is up to the Council to provide a further explanation. We are not clear on the extent to which the proposed level of growth at Silsden is related to and dependent on a new bypass to the east of the Settlement.
11. We retain our view that Steeton with Eastburn should in fact see an increase in the housing requirement to 1,150 units. This Local Growth Centre is located in a strong position in the Airedale Corridor and benefits from excellent communications. It also has significant potential to contribute to economic growth in the form of new housing and employment developments. The relatively high level of local job provision presents a key opportunity to reduce journey to work lengths and support other key policy objectives by contributing to the necessary supporting infrastructure.
- ii. Does the amended distribution of development properly reflect policy constraints (eg. Green Belt), physical constraints, such as flooding, infrastructure, facilities, traffic and transport, heritage, landscape and environment (including the updated HRA), the latest land availability information and cross-boundary implications?*
- iii. Is the amended distribution of development likely to be deliverable over the plan period, and does it reflect an appropriate balance between brownfield and greenfield land?*
12. We consider that the apportionment of development in Airedale can be delivered over the plan period. In our main evidence to the Publication Draft CS we summarised the considerable success achieved in implementing the Airedale Master Plan to date together with continuing initiatives which will provide further economic development and job growth generating and supporting the need for the distributed housing numbers. We would reiterate the key delivery points we have made in response to the same questions on the Regional City of Bradford.

### **c. Wharfedale**

- i. Why has the apportionment of development to the Wharfedale sub-area (including Ilkley [800-1,000], Burley-in Wharfedale [200-700], Menston [400-600]) been increased from 1,600-2,500 dwellings?*
13. The primary reason for the increase in the housing apportionment in the Wharfedale sub-area is as a result of the revised HRA. As referenced in response to Matter 2, we support the reinstatement of Menston and Burley as Local Growth Centres and the subsequent increases in the housing apportionment. We do however, maintain our objections to the increase in the apportionment to Ilkley and still conclude from our detailed work on an Area Plan for the Town that this should be increased further to 1,250 dwellings.
14. Given the amount of opposition by various action groups to Ilkley as a Principal Town, we continue to maintain our full support for the future enhanced role of Ilkley as a Principal Town serving

Wharfedale. Ilkley has performed the function of Principal Town for several decades and the strategy within the Core Strategy to re-inforce that role is wholly appropriate. Ilkley should contribute significantly to the level of housing required in the District as a whole and the Wharfedale sub area in particular. We maintain our consistent argument that Ilkley should provide a figure of 1,250 dwellings throughout the plan period though this figure can incorporate some of the reserved land requirement via the masterplanning of the individual larger allocations.

15. Ilkley performs several roles including its operation as the core service centre for all the Wharfedale settlements. It's very good range of retail and service facilities coupled with its strong public transport connections further support a higher level of growth in this location. Our detailed work to date in this settlement establishes that there is capacity for an enhanced level of growth similar to the housing figures in the FEDCS and that this can be achieved while also delivering a series of environmental enhancements. Assistance with the delivery of new infrastructure, affordable housing and jobs is further justification for the enhanced levels of development.
16. There is scope for carefully designed and controlled expansion to the east and west of the town without materially harming its key environmental qualities. This can be achieved via greenfield urban extensions into the Green Belt to the east and west of the town to deliver residential development, a new business park and a new secondary school, with very attractive new green infrastructure and additional and enhanced habitat. Removing land from the Green Belt is a necessary approach because of the exceptional circumstances of employment; housing and infrastructure need and supply shortage of homes and jobs. The Growth Study produced by Broadway Malyan for the Council is a key part of the evidence base which is generally supportive of such urban extensions.
17. Whilst we support the increases to the apportionment to Menston, Burley and Ilkley (though in Ilkley we consider that the increase doesn't go far enough) primarily as a result of the revised HRA, we maintain our objection to the lack of increase to the apportionment of housing in Addingham. We consider Addingham can and should accommodate circa 275 dwellings plus a reserve land component. We conclude that there is more than sufficient land in sustainable Green Belt releases, some of which are small in scale, and small developments within the urban area to meet a distributed housing requirement of 275 dwellings. This level of housing growth can be supported by the services which already exist and in turn this level of development will add further support for the retention and in some cases the expansion of those services. Green Belt releases proposed in Addingham do not adversely impact on 4 of the 5 main functions and purposes of Green Belt designation. The only argument which can be applied is the retention of open countryside. A positive planned approach will ensure retention of key sectors of open countryside which are important to the setting and character of the village. The two smaller development proposals we are advocating at the northern and southern ends of the village, while in the Green Belt, are both contained sites whose development would not lead to any encroachment into the wider countryside around the settlement.

***ii. Does the amended distribution of development properly reflect policy constraints (eg. Green Belt), physical constraints, such as flooding, infrastructure, facilities, traffic and transport, heritage, landscape and environment (including the updated HRA), the latest land availability information, and cross-boundary implications?***

***iii. Is the amended distribution of development likely to be deliverable over the plan period, and does it reflect an appropriate balance between brownfield and greenfield land?***

18. Our work to date at both the strategic, local and site specific level in Wharfedale leads us firmly to the conclusion that a figure of 2,825 is wholly justified and deliverable within this area of high housing need and demand (see NLP Report 'Wharfedale Local Area – Housing Market Signals Analysis' - 31 March 2014).
19. Our area and site specific work also leads us to the conclusion that this level of development can be adequately accommodated while taking full account of the constraints listed in question cii as well as minimising any adverse impact on the openness and functions of the Green Belt. The development proposed in the Wharfedale settlements will make significant contributions to infrastructure provision both in terms of area and site specific planning and financial contributions.
20. We have maintained our agreements with the Council that exceptional circumstances exist within Bradford District for the release of discrete areas of Green Belt and there is no evidential basis for not allowing masterplanned Green Belt releases in the Wharfedale settlements.
21. We consider that the larger apportionment of development to Wharfedale is deliverable in the plan period but this is dependent on the following key actions and full co-operation between landowners, the development industry and the Council alongside full consultation with and involvement of local communities. These key actions can be summarised as follows:-
  1. A concerted effort to make more rapid progress on the Allocations DPD with achievement of the earliest possible publication of the final submission draft, and early EIP and subsequent adoption.
  2. The early release of both brownfield and greenfield sites with strategic urban extensions and other large housing and mixed use development projects progressing through master-planning alongside the preparation of the Allocations DPD.
  3. Full account should be taken of the development industries representations on the Council's phasing proposals for sites with appropriate changes to this policy to speed the release of sites.