

1. Introduction

- 1.1 These representations have been submitted on behalf of Elaine Walton. The representations submitted on Elaine's behalf previously in regard to the Core Strategy (CS) modifications essentially revolved around a common theme that because the Council has split the CS from the Site Allocations Document/examination (SSA) it would be premature to consider reducing site allocation numbers in Baildon.
- 1.2 The Inspector wishes to consider a number of issues further and on that account has proposed a series of hearings. The Inspector has prepared a schedule of MIQs to focus discussion at the hearings. Of particular interest to us and to the site which we are interested (SHLAA site Baildon BA/004- The Rowans) are:
- *Matter 3 B ii- Impact of constraints and heritage*
 - *Matter 3 B iii- Whether the revised housing delivery can provide the necessary 5 year supply*
- 1.3 The Inspector has restricted the length and basis of representations. With such a restriction it is difficult/impossible to respond to the above issue fully. However we presume that as this restriction has been imposed the Inspector acknowledges that consideration of such issues should properly arise with the SSA process.
- 1.4 These representations build upon those submitted previously and seek to assist the Inspector in addressing the above questions with a particular focus on constraints at BA/004.

2. Matter 3 B ii- Constraints and Heritage

2.1 The Inspector wishes to consider the impact of constraints and heritage. Our previous statement essentially argued that detailed consideration was premature at this stage and we maintain that position. To assist the Inspector in considering matter 3 B ii we provide an indication of constraint and heritage issues affecting SHLAA sites within the Baildon affected by the World Heritage Site (WHS) buffer zone.

2.2 Site constraints cannot truly be assessed without fully considering and contrasting them with site advantages. We begin by summarising advantages site BA/004 offers for development:

- *BA/004 is surrounded on 2 sides by housing development and on the third side by Crook Farm caravan park which is effectively permanent development as outlined below.*

BA/004 shown in yellow



- *BA/004 is linked to Lucy Hall Drive (LHD) by public highway (The Rowans) which was provided with the adjoining housing development with the intention of serving BA/004. LHD is a quiet but well-engineered road.*

- Bus services run along LHD providing sustainable transport, with a bus stop already provided at The Rowans. Services are provided by the 655, 656 and 659, it is also within walking distance of Coach Road bus services in lower Baildon.

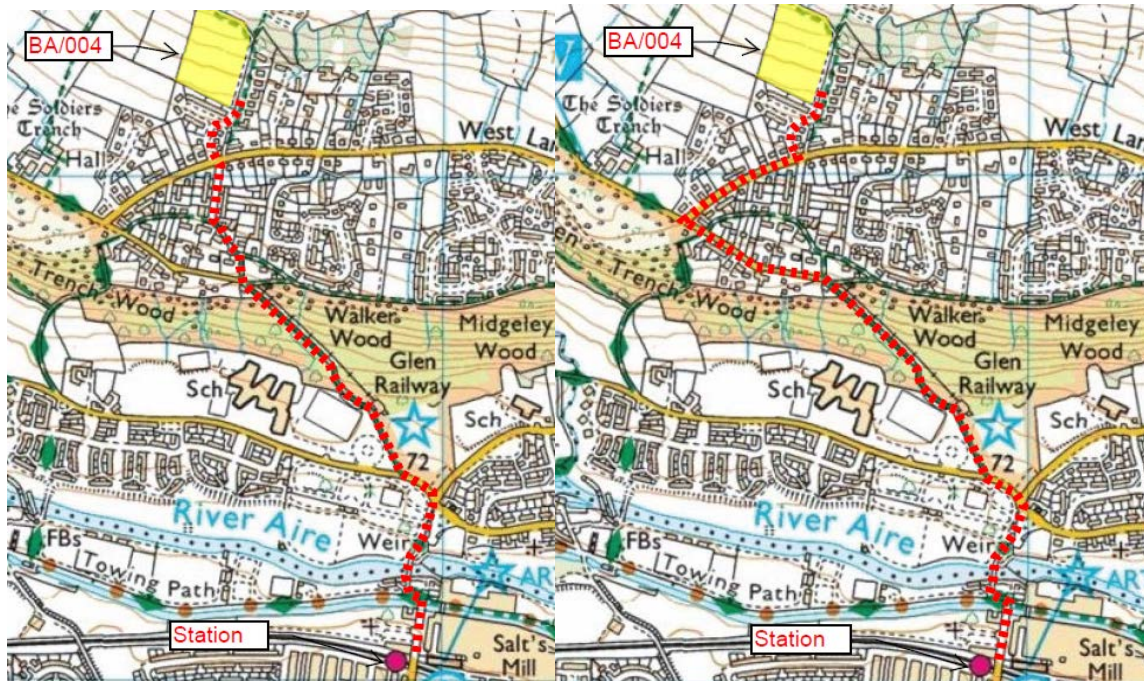
Bus Stop & LHD/Rowans Junction:



- BA/004 is within walking and cycling distance of Saltaire Rail Station via the route shown on the plans below. The car route to the nearest rail stations is actually greater in distance and time compared to cycling. Consequently the accessibility of the site actually encourages the use of sustainable transport by making cars a less desirable option to access rail services and facilities in Saltaire.

Walking route:

Cycling route:



- Development solutions could be adopted which actually provide greater public access to views of Saltaire by sensitively developing parts of sites BA/004 and BA/018 with a large central area of open space providing a view corridor to

Saltaire. It would be appropriate to consider detail of such options at a later stage in the planning process.

- *Development of site BA/004 could provide a new cycle and improved pedestrian access to Crook Farm which could assist in delivering more sustainable development on that site and replacing the detractor development with less visually intrusive development. Such a solution could potentially provide an enhancement to the setting of Saltaire. This is considered further below.*
- *BA/004 is within walking distance of:*
 - *The Glen Public House*
 - *Titus Salts Grammar school*
 - *Sandals Primary school*
 - *Glenaire Primary school*
 - *Coach Road Post Office and Convenience shops*
 - *Pubs, café's and shops in Saltaire.*
 - *Hockney Gallery*
 - *Play areas at Thompson Road/Roberts Park*
 - *Substantial areas of open space- Shipley Glen and Baildon Moor*
 - *Bradford Amateur Rowing club in Saltaire*
 - *Salts Sports association tennis courts and cricket ground*
- *Multiple employment opportunities exist within walking distances in Saltaire and lower Shipley including major employers such as:*
 - *HMRC*
 - *NHS administration*
 - *Pace*

Crook Farm

- 2.3 BA/004 is surrounded to the north by Crook Farm caravan park. A section 106/deed of variation restricts occupation between the 15th January to the 1st March. During the vacant period the site remains occupied by a mixture of permanent static caravans and log cabins.

Crook Farm:



- 2.4 The principle of development at Crook Farm is permanent, albeit the use restricted. The NPPF (Para 85) states that the greenbelt should be defined by using physical features that are readily recognisable and likely to be permanent. Although Crook Farm is within the greenbelt it falls within the NPPF definition of previously developed land on account of its current use.
- 2.5 Figure 10 of the 2014 Study (see below) excludes Crook Farm from the harsh urban edge yet at B113- Page 29 shows it as development. The 2006 Saltaire World Heritage Site Environmental Capacity Study identified Crook Farm as a Detractor. Due to its status it is necessary to accept that Crook Farm constitutes part of the hard urban edge of Baildon. It has that appearance when viewed from Saltaire as can be seen below and is considered a detractor within the WHS buffer.

Crook Farm over Salts Mill:



- 2.6 Although some may prefer Crook Farm to be returned to greenfield land this is a scenario which will not happen. To mitigate the impact of the detractor it is necessary to consider solutions which would be financially viable for the market to deliver.
- 2.7 If the static caravans were replaced by low density development constructed using materials sympathetic to the local vernacular would represent a significant enhancement in setting and mitigate the detractor.
- 2.8 Such an enhancement would only be delivered by the market if it was financially viable. A key way to make such development viable would be to allow the delivery of low density sympathetically designed permanent housing.

Crook Farm could be sustainably linked to Baildon through provision of an enhanced pedestrian and new cycle route from the Rowans through BA/004 or by integration of this with development of site BA/004.

Illustrative link routes:



- 2.9 The site would then have many of the location benefits of site BA/004. It would become more sustainable than the current development and would offer a viable solution to remove detractors from the WHS buffer.
- 2.10 Integration of a sensitively developed BA/004 and sensitively redeveloped Crook Farm could mitigate the detractor impact of Crook Farm and could represent sustainable development. Consequently there is a reasonable possibility that additional housing development in the WHS greenbelt buffer could improve the setting of the WHS contrary to the Historic England objection. It would therefore be premature to reduce target housing allocations for Baildon.

Constraints

- 2.11 BA/004 currently falls within the greenbelt but as identified above it is surrounded on 3 of 4 sides by development.
- 2.12 The SHLAA refers to the site as steeply sloping. Although the site does slope “steep” is an exaggeration. The topography is not an impediment to development.
- 2.13 In our previous submission we referred to the March 2006 Saltaire World Heritage Site Environmental Capacity Study. The 2006 study remained on the Council website in January without reference to an updated being undertaken. We now

understand it was updated in 2014 to form the Saltaire World Heritage Site Management Plan. Similar themes exist however certain points require addressing:

- *Crook Farm is less clearly identified as a detractor, however the site clearly remains in similar /comparable form to 2006.*
- *The 2014 document includes a view of Saltaire over Site BA/004 at page 22 view 16 shown below:*

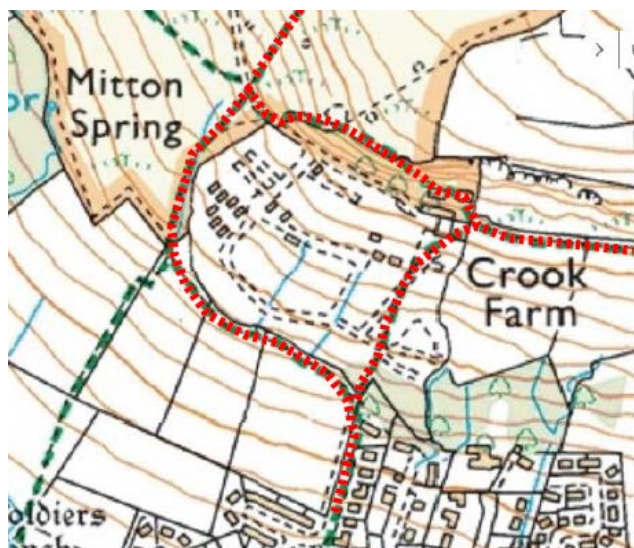


View 16 from Crook Farm looking south-east to Saltaire

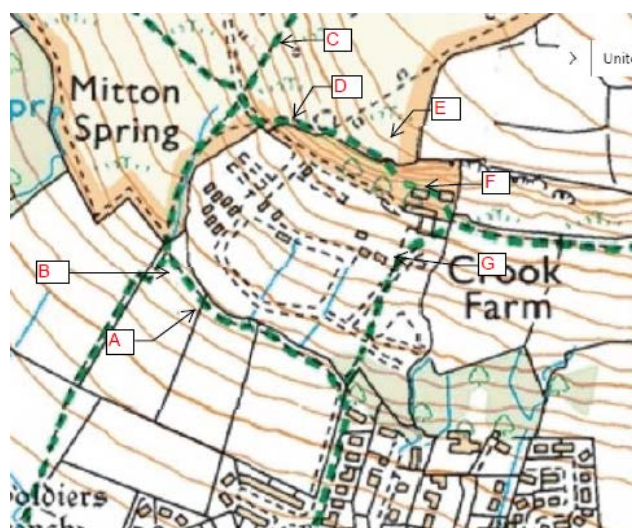
View 16 from Crook Farm looking south-east to Saltaire (Critical) is located on public footpaths immediately to the south west of the Crook Farm

- 2.14 The view is taken from a little used public footpath which surrounds Crook Farm. What the study does not properly account for is that comparable views of Saltaire can be taken from a number of other locations on the footpath without taking the view across site BA/004.
- 2.15 The plan below shows the location of comparable view points. The Inspector is requested to make an unaccompanied site visit to walk the footpath surrounding Crook Farm shown in red on the plan below.

Paths surrounding Crook Farm



2.16 Alternative viewpoints shown by A-G below:



2.17 If Crook Farm was comprehensively redeveloped and sustainably linked to Lucy Hall Drive the opportunity could exist for creation of central open space in the development which would also offer very good views of Saltaire. Alternatively tree obstructions could be cleared from point E and Saltaire could be viewed in the panoramic context of the wider Aire valley and surrounding moors. A further option could involve developing BA/004 and BA.018 but retaining a central open space corridor, retaining the existing view of Saltaire. Such options could offer greater public access to views of Saltaire than are available at present.

2.18 Appendix 7 page 1 of the 2014 study states: *“It is to be expected that the Site’s setting will evolve over time through change and as the significance of Saltaire and*

its relationship with its surrounding landscape becomes better understood.” So it is accepted that some development may happen within the setting of Saltaire. Evidently any such development would need to be sensitively designed and that would be a matter for processes after the adoption of the CS.

- 2.19 Page 23/24 of the 2014 study states that *“Where development would be likely to adversely affect views into or out of the WHS will only be permitted where a suitable programme of mitigation is proposed.”* This further demonstrates that sensitively designed development could be acceptable within the WHS buffer.
- 2.20 It is noted that there are some errors in the 2014 study. For example the plan at Figure 4 is not accurate because unlike the plan suggests the WHS cannot be seen from parts of site BA/004 and BA/005 and land adjoining BA/005 and vice versa. Similarly Figure 9 shows some areas as critical where the same viability issue arises.

3. Assisting meeting housing need in Saltaire

- 3.1 Saltaire is a desirable housing location but has very limited scope for additional housing as evidenced on the Shipley SHLAA. The only major site in the Trajectory is SH/022. However this is an area of public open space within clear views of Salts Mill, Salts church and Victoria Hall as shown below. Although only part is allocated as open space in the RUDP the whole is effectively used as open space. Loss of open space for development is generally considered inappropriate. One therefore has to question whether this site is deliverable and the impact of development here on views of Saltaire.

SH/022 from Wycliffe Road



- 3.2 Due to the sustainable transport links between BA/004 and Saltaire together with the nearest rail station falling within Saltaire, it is likely that anyone residing in BA/004/18/5 would form part of the Saltaire community. Development of Site BA/004 will therefore provide an opportunity for greater number of people to benefit from forming part of the WHS community without developing urban open space within Saltaire itself. It would also assist in meeting housing demand in Saltaire.

4. Other Baildon SHLAA sites in WHS buffer

- 4.1 We do not comment substantively on other sites in Baildon at this stage. However other sites and BA/004 have been identified though the SHLAA process.
- 4.2 If BA/004 and BA/018 (part below) are considered together they mostly surrounded by permanent development and could be considered together.



- 4.3 Part of BA/005 falls outside of views of Saltaire as shown in blue below. Although the yellow area is greenbelt recent case law has classified it as previously developed land.¹



¹ Dartford Borough Council v Secretary of State for Communities & Local Government (CO/4129/2015)

4.4 Section 5.3 of the CS outlines the evidenced based approach to determining housing requirement allocations by location as shown below:

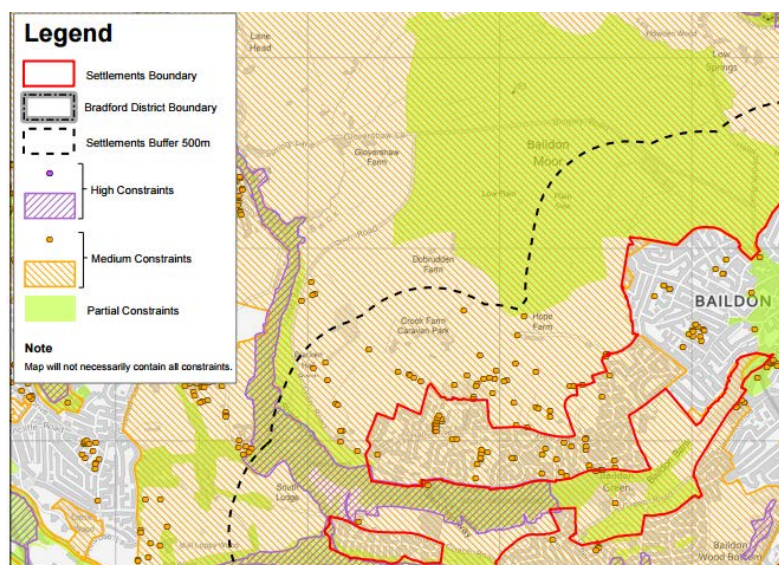
5.3.6 The key evidence which has underpinned this section of the Core Strategy and which will be outlined in more detail below includes:

- The Bradford District Housing Requirement Study (February 2013) and Addendum Report (August 2013)
- The Bradford District Strategic Housing Market Assessment (SHMA) 2010 and SHMA Update 2013
- The Bradford District Strategic Housing Land Availability Assessment (SHLAA) October 2011 and SHLAA Update May 2013
- The Bradford District Affordable Housing Economic Viability Assessment (AHEVA) 2011 and Local Plan Viability Assessment 2013

4.5 Housing allocations by settlement in the original draft of the CS were guided by this evidenced based approach. However the revised allocations proposed by the LPA were instead guided by a reaction to an un-evidenced objection from Historic England.

Bradford Growth Assessment (BGA)

4.6 We also draw the Inspectors attention to the Bradford Growth Assessment <https://www.bradford.gov.uk/asp/bga/index.asp> this represents an evidenced based approach determining suitability of sites to guide the Local Plan process. The extract below shows key sites in Baildon within the WHs buffer and notes only medium constraints to development. The BGA identified similar constraints affecting the majority of SHLAA sites in Silsden where the LPA proposes to move the Baildon housing allocations.



- 4.7 The BGA considered sites in Baildon but does not specifically address SHLAA sites within the WHS buffer zone, it instead adopts a more holistic analysis. It identifies sites to the east of Baildon as less constrained but states at page 29 of Local Service Centres Volume 1 that other areas could deliver limited amounts of development with appropriate mitigation.
- 4.8 Crucially the BGA assesses Baildon in the context of the Baildon settlement, to some extent in isolation of the surrounding settlements. The sustainable walking and cycle link between Lucy Hall Drive and Saltaire as shown above means this analysis is flawed as it fails to take account of the proximity of such sites to the Saltaire settlement and infrastructure.

5. Matter 3 B iii Housing delivery

- 5.1 The Council proposes to reallocate housing from Baildon to Silsden. Increasing the overall amount of housing allocated for Silsden. From a delivery perspective it is generally accepted that in any location there is a finite amount of housing a developer is prepared to deliver annually or that the market is willing to purchase at a price where it is viable to for the developer to deliver each year.
- 5.2 If we assume the SSA is adopted in 2018 that leaves 12 years in the plan period for the delivery of 1200 housing in Silsden. This means an annual delivery of 100 houses per year in Silsden every year for the housing need to be met. If one considers the time taken to secure planning consent and deliver infrastructure required for this number of houses then the annual delivery may have to be delivered in a more constrained period. In a weak market such annual delivery may not be achievable. If the annual delivery needed to provide the necessary Borough 5 year supply is spread over a larger area it is likely to be more deliverable in a weak market by mitigating market saturation in one location.
- 5.3 Baildon is a location where housing demand exists, where housing values support the viability and thus delivery of development. Even during the recession Barratt David Wilson Group continued to develop site BA/009 demonstrating the resilience of the market in Baildon. Thus retaining housing allocations in Baildon is also likely to ensure additional housing is delivered if a further economic downturn occurs within the plan period.
- 5.4 The BGA has highlighted medium constraints affecting development of many SHLAA sites in Silsden. This is the equivalent level of constraint as identified for the Baildon SHLAA sites within the WHS buffer. Therefore an evidence based approach commissioned by the Council has suggested similar constraints in both locations.
- 5.5 We understand that the Council have previously reallocated housing from Haworth to Silsden and raise concerns as to whether sufficient infrastructure exists to support the extent of housing development proposed in Silsden. We also question whether market demand for housing in differing locations within the Borough can be met by focusing additional housing development on Silsden.

5.6 Although we do not comment on representations made by others we ask that the Inspector considers in detail objections to additional housing allocations in Silsden.

6. Key issues

6.1 Housing allocations split by settlement in the original draft of the CS were guided by an evidenced based approach. However the revised allocations proposed by the LPA were :

- *Guided by a reaction to an un-evidenced objection from Historic England.*
- *Based on an un-evidenced premature presumption that greenbelt releases within the WHS buffer would not meet the exceptional circumstances test.*

6.2 An evidenced based approach in the form of the Bradford Growth Assessment has highlight development constraints in Silsden and has not suggested development would be inappropriate in the WHS/Baildon buffer.

6.3 Due to the sustainable links between these Baildon sites and Saltaire they should be considered in regard to meeting housing need in Saltaire as well as Baildon.

6.4 A premature presumption that greenbelt releases within the WHS buffer will not meet the exceptional circumstances test will push development in Baildon to other SHLAA sites including BA/7,8,&11 which are owned by Bradford Council. Reduced housing delivery in a desirable housing location is likely to result in greater growth in housing values and thus growth in development value of Council land assets.

6.5 Local plans must be prepared with a presumption in favour of sustainable development. This is an inherently pro-development assumption. If there is a:

- *Reasonable possibility sustainable housing sites in Baildon can be delivered,*
- *There is a demand for such housing and*
- *A solution could be adopted which mitigates impact on the WHS*

6.6 Then it would be contrary to the presumption, inappropriate and premature to reallocate housing to Silsden. At the SSA stage full consideration will be given.