

BRADFORD LOCAL PLAN CORE STRATEGY**EXAMINATION IN PUBLIC – PROPOSED MAIN MODIFICATIONS****Response to Inspector’s Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)
(Representor ID: 034)*****Matter 3: Revised Spatial Distribution of Development*****Preamble**

1. On behalf of our client Persimmon Homes (West Yorkshire), we write to provide comments in response to the Inspector’s schedule of Matters, Issues and Questions in relation to the Bradford Local Plan Core Strategy Proposed Main Modifications. This follows our previous comments made on the Proposed Main Modifications to the Core Strategy in January 2016.
2. Our client is one of the UK’s leading house builders, committed to the highest standards of design, construction and service. They have a large number of site interests across Bradford District and therefore are very keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

Persimmon Homes Site Interests in Bradford

3. This is a list of our areas where our client has site interests:

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley

- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

- Nab Wood (Shipley)
- Heaton (North West Bradford)
- Daisy Hill (North West Bradford)

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 3, which covers the Revised Spatial Distribution of Development, is contained in this statement. The key issue highlighted by the Inspector is:

“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?”

6. We consider below the specific questions asked by the Inspector:

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?

7. The Council set out their proposed justification for the amendments to the housing distribution within the Statement of Consultation and Summary of Representations documents of March 2016.
8. The Council argue that not only is there a need to plan for the correct level of growth through the plan period, there is also a requirement to ensure that growth is distributed to the areas of greatest need. The Council consider that the greatest level of need is required within the larger urban centres rather than in the smaller villages. The Council state that the amendments to the housing distribution are as a result of updated evidence within the HRA.

9. The Council have reduced the housing requirement within Shipley from 1,250 units to 750 which is considered to be a significant reduction. It is unclear as to the exact reason why such a substantial reduction in housing provision in Shipley is proposed. MM77 states that *"the amendment reflects the proposed changes to the housing distribution within Policy HO3 which in turn reflects the revised HRA, updated land supply evidence within the third SHLAA and representations made in particular by English Heritage"*.
10. It is noted that English Heritage made comments regarding the proposed level of housing growth around the World Heritage Site of Saltaire, which is located within the Shipley sub-area, however at no point within their submissions do they state that there should be a reduction in housing distribution within Shipley. English Heritage seeks reductions in the level of housing distribution within Baildon rather than Shipley.
11. However, it is noted that English Heritage support the reduction in the distribution of housing within Shipley within their representations to the proposed Main Modifications to the Core Strategy and the following comments were made – *"the suggested change in the housing requirements for Shipley now provide a greater degree of confidence that sufficient land will be able to be identified to meet this total without requiring the development of sites which have been identified as being critical to the setting of the World Heritage Site at Saltaire"*.

ii) Does the amended distribution of development properly reflect policy constraints (e.g. 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?

12. The Council's proposals to reduce the housing distribution in Shipley from 1,250 to 750 units is not considered to be justified or positively planned and is not therefore sound as it is not based upon sound and robust evidence.
13. Shipley and surrounding settlements are highly sustainable and it is not considered that this level of growth is commensurate to the size of the settlement. The proposed reduction would conflict with the Core Strategy's aim, as set out at Policy

SC4 that the Regional City of Bradford (with Shipley and Lower Baildon) will be the prime focus for housing. Indeed, the level of growth now proposed within Shipley is lower than a number of the Local Growth Centres. The justification for this reduction is not considered to be sound and our Client strongly objects to the proposal. Whilst it is acknowledged that consideration does need to be given to the World Heritage Site at Saltaire, the proposed reduction is significant and completely unreasonable, particularly as the housing distribution for Baildon has been reduced as requested by English Heritage.

14. There is sufficient land supply within the Shipley sub-area to accommodate a greater level of development than the 750 units now proposed, which are very unlikely to have any impact upon the World Heritage Site of Saltaire, particularly around the areas of Nab Wood and Windhill.
15. The modifications to Policy HO4 do not meet the tests of paragraph 182 of the NPPF and are not considered to be justified, effective, positively prepared or in accordance with national planning guidance and as such is unsound. The Policy should be amended to attribute a greater housing target to Shipley.

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?

16. We would reiterate our comments during previous representations and hearing sessions regarding this matter.

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?

17. Please refer to paragraphs 7 and 8 of this statement. It is understood that the reduction in the housing target in Baildon has been reduced as a result of objections raised by Historic England.

ii) Does the amended distribution of development properly reflect policy constraints (e.g. 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?

18. As per previous representations to the Core Strategy, including the proposed main modifications, and during Examination hearings, we would continue to object to the Council's failure to increase the housing target for the settlement of Cottingley.
19. The level of growth proposed from Cottingley is not considered to be commensurate with size and sustainable nature of the settlement. Policy AD1 is not considered to be sound as currently drafted and does not meet the tests as set out at paragraph 182 of the NPPF.

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?

20. We would reiterate our comments during previous representations and hearing sessions regarding this matter.

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?

21. The apportionment of development within the Wharfedale sub-area has been increased from 1,600 to 2,500 dwellings due to the revised settlement hierarchy, which has led to Menston and Burley-in-Wharfedale being reinstated as Local Growth Centres, having been classified as Local Service Centres. In addition, the housing provision attributed to Ilkley has been increased as a result of the revised HRA findings. These changes are supported by our Client as they recognise the sustainable nature of the settlements and their classification within the settlement hierarchy. For example, Ilkley is a Principal Town and the increase in the housing target from 800 units to 1,000 and is now commensurate to the size and stature of

the settlement. Ilkley has a number key services and facilities and the level of growth should not be restricted has had originally been proposed in the Publication Version of the Core Strategy. It is considered that main modification 51 addresses this and is supported.

22. This amended apportionment of development within the Wharfedale sub-area is welcomed and Policy WD1 is now considered to be sound and meets the tests of paragraph 182.

ii) Does the amended distribution of development properly reflect policy constraints (e.g. 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?

23. It is welcomed that the Council have acknowledged the less precautionary approach within the amended HRA and increased the distribution of housing within the Wharfedale sub-area, and in particular have acknowledged that Menston should be classified as a Local Growth Centre and that the Principal Town of Ilkley should have an increased housing target. These changes are supported by our Client.

24. It is considered that this approach will ensure that there is sufficient suitable sites within Menston and Ilkley to meet the Council's revised housing targets for the settlements.

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?

25. We would reiterate our comments during previous representations and hearing sessions regarding this matter.