

City of Bradford MDC
Core Strategy – Proposed Main Modifications Development Plans
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Jacob's Wells
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23525/A3/CA/ds

20th January 2016

Dear Sirs

BRADFORD CORE STRATEGY MAIN MODIFICATIONS - RESPONSE

As per our previous representations and appearances at the Examination in Public we write on behalf of Chartford Homes (our Client), with particular regard to land in Addingham. Whilst we are grateful for the Councils proposed modifications, our Client is disappointed that the matters raised during the examination have not been given further consideration.

Background

Addingham is a settlement identified for growth as a Local service Centre. There is a clear need for Addingham to have new homes with an average household size of 2 (the district average being 2.5), 20% of the population being over 65, compared to the 13.2% district average and a recent population decrease of 1.2% as opposed to the average district growth of 12.9%

Addingham is located with Wharfedale, which was previously the subject of restrictions due to the Habitat regulations (HRA) imposing limitations on new development. Addingham was initially proposed for 400 homes, subsequently reduced to 200 homes in the Publication Draft of the Core Strategy.

The Housing background Paper 1 refers at paragraph 9.8 to the need for a proportionate reduction in settlements as a result of an overall reduction in the district wide level of growth and a further reduction in Addingham as a result of the HRA. Theoretically Addingham therefore had a double reduction. This is shown with the current 50% reduction as opposed to an average 25% reduction to other settlements.

Objections to the Redistribution of Homes in MM51 and MM88

The Council have since accepted that the HRA was unsound and as a result the level of homes have been reinstated to the pre-reduction levels, apart from Addingham, which remains in MM88 as a proposed 200 new homes. It is noted that the Councils reasoning is that when redistributing the previously rescinded homes, they should be reallocated to the most sustainable settlements in Wharfedale.

Our Client understands this rationale and the notion of the settlement hierarchy and does not propose for a reduction of homes in these settlements. However our Clients objection relates to the lack of redistribution horizontally amongst the Local service Centres, which should take place.

Addingham has historically been identified as one of the most sustainable, if not most sustainable of the Local Service Centres. Attached to this letter is a table which identifies Local Service Centre Provision and the Councils scoring mechanism. Previously the HRA was included as a negative score, which reduced Addingham's sustainability. With this corrected it is clear that Addingham scores 17 points and has equal top rank.

This was reflected in the CSFED, whereby Addingham had 11.4% of the Local Service Centre home, compared to the current 7.8% proposed. With the removal of the HRA and its subsequent reduction, a proportional reduction as proposed by the Councils background paper would result in Addingham retaining 11.4% of the homes and a subsequent increase to 291 homes.

As noted the Wharfedale figure should also in turn be increased to reflect this, therefore MM88 should amend the figures to take account of Addingham's sustainability.

The Councils purported reasons

At the EiP the reasons for not doing this were listed as sustainability, population and growth paper scores. The sustainability table shows that Addingham is the most sustainable of the settlements in this tier of the hierarchy and removal of the HRA as accepted by the Council would increase the scores in the growth paper. At present the Council have removed the HRA but not followed this through to amend the growth paper scores and the vertical distribution. Addingham currently has a population of 3172 people with only 200 homes proposed (6.21%) as opposed to settlements such as Denholme with a population of only 2715 but 350 new homes at 12.89%.

A clear example of the discrepancy can be seen with East Morton as shown below:

Category	East Morton	Addingham
Local facilities	Primary School Community centre	Convenience Store Primary School Health Centre Post office Library Community Centre
Existing population	1,309	3,172
Proposed level of new homes	100	200
Proportion of growth to population	7.64%	6.31%

It cannot be conceivable to promote higher growth in a settlement that has a third of the population and services that Addingham has. Therefore the Local Service Centres should be redistributed to reflect the need for more homes in Addingham and in turn Wharfedale.

The omission of a Green Belt review in Policy WD1 omitted in MM52

Our Client notes that modifications are proposed to Policy WD1 of the Core Strategy and they make the following comments.

The Further Engagement Draft of the Core Strategy stated that 400 dwellings would be delivered within the Addingham and that Green Belt release would be required in order to achieve this target.

The Submission draft of the Core Strategy reduced the housing target for Addingham to 200 units and the Policy WD1 removed any reference to the requirement for Green Belt release in order to meet this revised target.

Our Client has previously made representations in respect of this matter as well as through the

examination hearings and they continue to strongly **object** to this reduction.

It is noted that the Key Diagram – Location Strategy did not include a green triangle adjacent to Addingham, which indicates potential localized Green Belt review. However, at the hearings, the Council confirmed that this does not preclude the release of Green Belt land in such areas.

Our Client is of the very strong opinion that Green Belt release is required to achieve the Council's proposed housing target in Addingham of 200 units. This is without prejudice to the fact that they consider a higher housing target should be set for the settlement.

We understand that the Council are of the opinion that the SHLAA demonstrates that sufficient sites are available on non-Green Belt land to deliver the proposed housing target, however, having forensically assessed the sites, we would disagree with this conclusion.

Our assessment is based upon SHLAA 3 (July 2015), which we understand is the most up to date version of the document.

In total, there are 7 non-Green Belt sites and 1 site which is partly Green Belt and partly non-Green Belt (AD/004). The table below provides an overview of the non-Green Belt sites as well as providing the Council's assessment in respect of each site.

Site Ref.	Site Yield	Council's Assessment	BW Comments
AD/002	34.5	Safeguarded land, outline approval for 5 units, application for 11 pending. Can accommodate additional development.	We understand that the site has consent for 21 units, with part of the site remaining undeveloped.
AD/003	52.5	Steeply sloping, TPO trees, village greenspace within conservation area. Should be considered alongside AD/004 with access from that site.	The site has several constraints which would reduce the capacity of the site. A large part of site AD/004 was within Green Belt and it would appear that access would need to be obtained via the Green Belt element of the site. Therefore, sites AD/003 and AD/004 cannot come forward without GB release.
AD/006	38	Sloping overgrown site with area of mature trees and part of site in FZ3a	Site has planning permission for 38 units.
AD/011	44	The site is constrained by access	Site can't be accessed. Can't assume the site will come forward.
AD/015	0	Village Greenspace. Access constraint not easily resolvable and thus not achievable.	Site can't be accessed. Can't assume the site will come forward.

AD/016	35	Access to site is limited and is a key constraint. Part of site in FZ3.	No guarantee that site can be accessed and can't assume it will come forward.
AD/018	5	Site with permission for 5 homes	No comments.
	209		

Therefore, if all non-Green Belt sites put forward in Addingham within the SHLAA were developed this would provide a total of 209 units. However, the Council's own assessment of several of the sites (AD/003, AD/011, AD/015 and AD/016) concludes that the sites cannot be accessed or are several constrained by access. As such there is no guarantee that any of these sites can be delivered. If none of these sites came forward, the total capacity of non-Green Belt sites would be 77.5, which is substantially below the target of 200.

Our Client therefore concludes that the Council do require Green Belt release in order to achieve the proposed housing target within Addingham of 200 units. Therefore, it is advised the wording of Policy WD1 includes for Green Belt release within Addingham to ensure that there is flexibility in housing delivery within the settlement, particularly as there are clear uncertainties that the level of development can be achieved on non-Green Belt land.

Our Client therefore **objects** to MM52 as Policy WD1 is currently unsound as it fails to meet the tests of soundness set out in paragraph 182 of the NPPF. The policy should be re-worded to include Green Belt release in Addingham.

We look forward to engaging further in the process and trust the Inspector will take our comments and duly made objections fully into account at the next stage.

Yours sincerely

STUART NATKUS

Director

Cc. Matthew Fuller Chartford Homes

