

Statement on Matters and Issues for
Bradford Metropolitan District Council
Core Strategy Proposed Main
Modifications Examination

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Contents

SUMMARY	3 – 4
MATTER 1: SOUTH PENNINE MOORS (Policy SC8 and associated policies)	5 - 7
MATTER 2: REVISED SETTLEMENT HIERARCHY (Policy SC4 and associated policies)	8 – 9
MATTER 3: REVISED SPATIAL DISTRIBUTION OF DEVELOPMENT (Policy SC5 and associated policies, including Policies BDI, ADI, WDI, PNI & HO3)	10 - 13
Matter 4: OTHER MATTERS	14 - 15
Appendix I - BH&DWH Core Strategy Main Modifications Representation	

Summary

Rural Solutions (RSL) on behalf of Barratt Homes and David Wilson Homes (BM&DWH) provide the following comments in response to the Schedule of Matters, Issues & Questions for the Bradford Metropolitan District Council (BMDC) Core Strategy Main Modifications Examination Hearings.

In general BH&DWH consider that the Submission version Core Strategy provides a cogent and justified strategy for the District. Our client is content with the majority of the main modifications, but has specific concerns regarding the LPA's approach to Wharfedale's settlements, taken in response to ecological issues.

The approach in relation to ecological issues was raised by other participants at the examination and has since been the subject of modification.

BH&DWH remains particularly concerned that notwithstanding the amendments to the South Pennine Moors HRA (Habitat Regulations Assessment) some of the implications of the overly cautious approach previously taken have not been rectified in the proposed modifications.

In particular, the approach taken to halving the amount of housing in the settlement Addingham in response to the South Pennine Moors HRA issue has not been revisited, despite the ecological approach having been fundamentally revised.

BH&DWH raised this significant issue in its representations on the Main Modifications. Of the four Wharfedale settlements within the Core Strategy spatial strategy, Addingham is the only one where the housing figure has been revised further to amendments to the approach to the South Pennine Moors HRA work. Addingham is the only Wharfedale settlement not referred to in Matter 3C.

The fifth settlement affected by the South Pennine Moors HRA work, Silsden in Airedale, has also seen a reduction and then increase in housing numbers as a result of this work.

BH&DWH has significant concerns in relation to the lack of revision of the housing figure for Addingham following the amendment of the approach to the South Pennine Moors ecological issue.

It is BH&DWH' position that this matters needs to be given due consideration at the examination hearing and the housing figure revised back to the level (400 homes) which was included in the Further Engagement Core Strategy draft: In summary a return to the level of sustainable growth determined

for the settlement before the Habitat Regulations Assessment work was applied as a constraining factor.

This is a fundamental matter relating to the soundness of the plan as it relates to Wharfedale and the plan in general. We trust that this matter will be given full consideration at the Examination hearing, in accordance with the points below and those made in our Core Strategy Main Modifications Representation, which is attached for reference.

MATTER 1 – SOUTH PENNINE MOORS (Policy SC8 and associated policies)

1.d. Have the implications of the revised HRA evidence for the overall strategy, the settlement hierarchy, spatial location and distribution of development and other key aspects of the development strategy been fully considered and explained?

- 1.1 BH&DWH does not consider that the implications of the revised HRA evidence have been fully considered and explained as they relate to Wharfedale's settlements.
- 1.2 In particular there is no explanation of why only three of the four settlements in Wharfedale within the Core Strategy's settlement hierarchy have seen housing numbers significantly *reduced* as a result of original HRA work and then significantly *increased* following revised HRA work, whilst the housing figure for Addingham has not been readdressed.
- 1.3 Furthermore the settlement of Silsden in Airedale also saw a reduction in housing numbers, as a result of HRA work, as noted at paragraph 5.16 of Core Strategy Publication Draft (2014) Background Paper 2: Housing (Part 1):
- “5.16. The settlement housing targets within the Publication Draft have therefore been informed by the full HRA and the survey and mapping work underpinning it. The settlements most affected by the SPA 2.5Km buffer zone and with consequent adjustments to their housing targets are:*
- *Addingham*
 - *Ilkley*
 - *Burley In Wharfedale*
 - *Menston*
 - *Silsden (eastern part)”*
- 1.4 Silsden, together with the settlements of Ilkley, Burley in Wharfedale and Menston, have seen a revision upwards of its housing number following amended HRA work.
- 1.5 The housing figure for Addingham was reduced from 400 houses in the Council's Further Engagement Draft Housing Distribution (October 2011) to 200 houses in the submission version Core Strategy as a result of HRA work. This figure has not been revised upwards again following the amendment of HRA work.
- 1.6 The Main Modifications propose increases from 800 to 1,000 dwellings for Ilkley, 200 to 700 dwellings for Burley-in-Wharfedale and 400 to 600 for Menston.
- 1.7 It is clear the HRA work had an important impact on the fifty percent reduction in the housing number for Addingham.
- 1.8 The rationale for decreasing the housing number for Addingham between the Further Engagement Draft Housing Distribution and the Submission version Core Strategy is clarified at length in the attached statement on the main modifications.

I.9 This includes the following main points:

- Paragraph 9.8 of the Core Strategy Publication Draft (2014) Background Paper 1: Overview (Update) states:

“9.8 The need to derive a revised housing distribution (in all settlements not just Wharfedale) in the CSPD depended not only on the HRA but also on a range of other factors including: A revision to the total district wide housing target – as a result of an updated objective assessment of housing need and updated evidence, the CSPD proposed a small reduction in the total housing target as compared to the CSFED. Thus even without considering any other factors an identical proportionate distribution of the district wide housing target would have resulted in a small reduction in the housing targets for the Wharfedale settlements; (our emphasis)

RSL Comment: A reduction in Addingham’s housing number from 400 to 200 cannot be described as a ‘small reduction’.

- Paragraph 9.9 goes onto state:

“9.9 Having said all of this, as far as Wharfedale was concerned, the potential direct and indirect impacts of the CSFED’s housing proposals on the SPA and its 2.5km buffer zone was the main driver for the changes eventually incorporated within the CSPD.”

RSL Comment: This paragraph serves to clarify the importance of HRA work to the reduction of housing numbers for Addingham and other Wharfedale settlements.

I.10 Paragraph 5.15-5.16 Core Strategy Publication Draft (2014) Background Paper 2: Housing (Part 1) sets out how the Council has applied these findings to housing numbers:

“5.15. Based on this advice the Council’s approach was twofold:

- *To seek a significant reduction in the settlements most severely affected so that both the direct affects from development sites and indirect affects relating to population increase and associated increased recreational activity were removed or reduced to acceptable levels;*
- *To reduce settlement targets to a level where those targets could – if necessary – be met entirely or predominantly from sites not identified as containing key sensitive habitats or where the species for which the SPA has been designated where not observed.*

5.16. The settlement housing targets within the Publication Draft have therefore been informed by the full HRA and the survey and mapping work underpinning it. The settlements most affected by the SPA 2.5Km buffer zone and with consequent adjustments to their housing targets are:

- Addingham
 - Ilkley
 - Burley In Wharfedale
 - Menston
 - Silsden (eastern part)”
- (our emphasis)

I.11 Paragraph 9.21 of the Core Strategy Publication Draft (2014) Background Paper 1: Overview (Update) states specifically with regard to Addingham’s housing figure that:

“9.21 A precautionary approach was also taken in Addingham – here the overall discounted capacity, although very significantly reduced, still lay above the CSFED housing target. However in this case account was also taken of the following factors:

- 1. The large cluster of recorded birds just to the south of the settlement;*
- 2. The overall recommendation of the HRA to reduce housing numbers in areas close to Rombalds Moor on account of potential direct and indirect impacts;*
- 3. Finally and most significantly Addingham’s relative sustainability, its position in the fourth tier of the settlement hierarchy and the increased developable supply within the Regional City in the second SHLAA which allowed a modest redistribution away from fourth tier settlements;” (our emphasis).*

I.12 The aforementioned ‘precautionary approach’ mentioned in relation to Addingham refers specifically to the ecological issues in question. There is no other justification for a precautionary approach to be applied in housing supply terms.

I.13 While comments in relation to sustainability are noted, the reduction by fifty percent of the housing figure can in no way be considered modest and the larger part of the reduction for the settlement is based upon a precautionary approach to ecological issues relating to HRA.

I.14 The failure to amend Addingham’s housing target following revised HRA work runs completely contrary to the revision of housing numbers for other settlements.

I.15 The implications of the revised HRA evidence for the overall strategy, the settlement hierarchy, spatial location and distribution of development and other key aspects of the development strategy have therefore not been fully considered and explained.

I.16 The approach to Addingham taken in the Main Modifications of the Core Strategy remains unjustified therefore and the Core Strategy needs to be modified further so that the housing figure for the settlements reverts to its earlier level.

MATTER 2: REVISED SETTLEMENT HIERARCHY

Key issue:

Is the proposed settlement hierarchy in terms of the amended status and role of Burley-in-Wharfedale and Menston appropriate, justified, effective, positively prepared, soundly based and consistent with the latest national policy?

a. What is the basis and justification for the revised settlement hierarchy, and is it based on up-to-date and robust evidence?

- 2.1 BH&DWH has no objections in principle to the revised settlement hierarchy as it relates to Wharfedale’s settlements.
- 2.2 It is the revised apportionment of housing between the settlements in the hierarchy which is considered inappropriate.
- 2.3 The table below shows the decrease and then increase of housing numbers relating to settlements, including Burley-in-Wharfedale and Menston, affected by the HRA work

Table 1: Impact of HRA Work Changes on Settlement Housing Figures

Settlement Affected by HRA Work	Core Strategy Further Engagement Draft Housing No.	Core Strategy Publication Draft Housing No.	Main Modification Housing No.	% increase between Publication Draft and Main Modification Housing No.
Menston	900	400	600	50%
Burley in Wharfedale	500	200	700	250%
Ilkley	1300	800	1000	25%
Silsden	1700	1000	1200	20%
Addingham	400	200	200	0%

- 2.4 It is clear that the increases in housing numbers for Burley-in-Wharfedale and Menston are artificially high on the basis that the reduction in housing numbers for Addingham has not been amended and increased on the basis of revised HRA work.
- 2.5 In relation to Burley-in-Wharfedale the main modification revision to a housing figure that is higher than the Further Engagement Draft figure is disproportionate and reflects an unequal redistribution of housing figures to Wharfedale’s settlements following amended HRA work.

c. What are the implications of including Burley-in-Wharfedale and Menston in the category of Local Growth Centres in terms of their future role and levels of growth, and are there any cross-boundary implications?

- 2.6 BH&DWH does not object in principle to the reversion of Burley-in-Wharfedale and Menston to Local Growth Centres.
- 2.7 However, the 250% and 50% increase in the housing figures for these settlements, since the Publication Draft Core Strategy is considered not to be justified in terms of the existing or future role of these settlements.
- 2.8 Rather it reflects the inequitable redistribution of housing numbers in Wharfedale following the revised HRA work and failure to amend the housing figure for Addingham.
- 2.9 BH&DWH considers that the Core Strategy remains unjustified in this regard.

MATTER 3: REVISED SPATIAL DISTRIBUTION OF DEVELOPMENT

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?

- 3.1 As outlined in relation to Matter 2 BH&DWH considers that the apportionment of housing numbers to individual settlements is unjustified and unequitable.
- 3.2 The revision upwards of housing numbers for three out of our of Wharfedale's settlements, following revised HRA work, while the housing number for Addingham remains unamended, is inappropriate.
- 3.3 It fails to have regard to the Council's own justification for reducing housing numbers for this settlement in the Publication Draft. This justification, addressed in summary at section one of this statement, and in detail in our comments on the Main Modification Statement, clearly outlines the impact of the HRA work on the decrease in housing numbers for Addingham (and other Wharfedale and Airedale settlements) between the Core Strategy Further Engagement Draft and Core Strategy Publication version.

ii. Does the amended distribution of development properly reflect policy constraint (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?

- 3.4 As reflected above the amended distribution of development is based on an inequitable distribution of development which fails to pay regard to the Council's own reasoned assessment relating to its Further Engagement Draft.

Land Availability

- 3.5 Main Modification 52 states that housing provision in Burley-in-Wharfedale which has increased by 250% between the Core Strategy Publication Draft and the Main Modifications housing figure, while the figure for Addingham has remained unchanged, will require "a significant contribution from green belt changes."
- 3.6 While BH&DWH does not consider green belt changes to be pejorative, it is clear that significant green belt changes in Burley-in-Wharfedale may be mitigated by a more equitable distribution of housing development amongst Wharfedale's settlements.

- 3.7 The table below reflects the amount of SHLAA capacity in each of Wharfedale’s four named settlements against the Main Modification housing number.

Table 2: Wharfedale Settlements SHLAA Capacity to Housing Number

Settlement	SHLAA 3 Capacity	Main Modification Housing Number	SHLAA Capacity as a Percentage of Main Modification Housing Number
Addingham	1142	200	571%
Burley in Wharfedale	1311.5	700	187%
Ilkey	1842	1000	184%
Menston	1097	600	182%

- 3.8 It can be seen that the percentage of housing land available in Addingham in relation to the settlement’s current 200 housing figure far exceeds that of Wharfedale’s other settlements,

- 3.9 Even if the housing figure was revised to 400 (the Further Engagement draft level) the percentage for Addingham would be 285%, still far in excess of the other Wharfedale’s settlements.

- 3.10 The difference between the land supply situation in Burley in Wharfedale and Addingham is particularly noticeable from relevant commentary in the 2015 SHLAA:

Addingham

“there remains a significant number of site options in Addingham which will need to be explored with an overall additional capacity in excess of 1000 units.”

Burley in Wharfedale

“This SHLAA has identified an overall capacity of over 1300 units on sites considered to be available and developable. Suitable now units aside this means that around 600 new homes will need to be identified on sites in the green belt unless alternative and more sustainable opportunities on sites within the urban area can be identified. Over 1000 units fall on existing green belt sites to allow flexibility in the selection of sites to accommodate the remaining need.”

- 3.11 There is more choice available to the allocation process for Addingham in comparison to all other settlements in Wharfedale, even if the settlement’s housing figure is revised back to the Further Engagement Draft levels.

- 3.12 In broad terms this means, based upon the choice available, that sites which could be allocated for development in Addingham are likely to score significantly better against site specific sustainability criteria such as landscape impact, than those in other Wharfedale's settlements.
- 3.13 The corollary is that there is potential for development of individual sites in Addingham to have less environment impact than the development of individual sites in other Wharfedale settlements.
- 3.14 The amended distribution of development in Wharfedale cannot be considered to be justified by land availability. In fact relevant figures point to the unsustainability of and lack of justification for the current distribution proposed.

Cross Boundary Implications and Transport

- 3.15 In relation to cross-boundary implications, it is noted that Addingham is within close proximity to the plan area's Wharfedale and Airedale's settlements, transport corridors and employment opportunities and facilities.
- 3.16 It is also noted that Addingham is within close proximity of the town of Skipton, within Craven District with a regular bus service to the town.
- 3.17 Skipton is the Principal Town within the emerging Craven District Council Local Plan¹ with 50% of the annual housing requirement (256 dwellings) for that plan area to 2026, equating to 128 dwellings per year, to be directed to the town, together with commensurate levels of employment development.
- 3.18 As well as being well served by local facilities within the settlement itself, Addingham is also well-placed to benefit from the growth of near Skipton as well as growth elsewhere within the plan-area.
- 3.19 In terms of transport links, the Core Strategy states: *"The village has also benefited from good bus connections to the principal town of Ilkley, the town of Silsden and neighbouring Skipton."*
- 3.20 Addingham is a sustainable place to receive growth as demonstrated by its classification as a Local Service Centre in the Core Strategy.

¹ <http://www.cravencd.gov.uk/newlocalplan>

3.21 Furthermore, the Council's Evidence Base² demonstrates the following four 'Key Planning Issues' for Addingham

“• *Population imbalance and an ageing population;*

• *Lack of and need for affordable housing within the village is a key issue;*

• *Availability of local school places;*

• *Protection of green spaces.*

3.22 BH&DWH consider that the lower level of housing is unlikely to address the first two key planning issues effectively. In particular the reduction by half of the overall housing provision for Addingham is likely to result in a reduction of (at least) half in the amount of affordable housing provided in the settlement, as the amount of affordable housing delivered on mixed tenure sites reduces. The settlement will become less sustainable if it does not receive an appropriate amount of growth over the plan period. This was previously assessed by the LPA to be 400 homes and we see no sound planning reason for the LPA not to revert to this number following revised HRA work.

3.23 In summary it is considered that the revised distribution of development does not reflect the matters referenced by the Inspector and remains unjustified.

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?

3.24 The Wharfedale sub-market area is the strongest in Bradford increasing the prospects of deliverability of housing in this area in comparison to low value areas such as the City Centre and its periphery.

3.25 However, by failing to revise the housing number for Addingham to the level incorporated in the strategy before the South Pennine Moors ecology issue was applied as a significant constraint, this has the potential to create deliverability tensions.

² LDF Evidence Base Bradford District Settlement Study Update – October 2011

MATTER 4– OTHER POLICIES & OTHER MATTERS

- 4.1 We note that other policies and matters to be discussed under Matter 4 are yet to be decided.
- 4.2 BH&DWH requests that the Council’s proposed phasing policy (Main Modifications 89 and 92) are specifically considered under Matter 4.
- 4.3 The Council’s approach to phasing was the second of two main issues addressed in BH&DWH’s Main Modifications Consultation Response (paragraphs 1.36 – 1.48). This is an area of significant concern for BH&DWH as it is a policy that could constrain housing delivery in the plan-area and adversely affect the area’s outlying settlements, through artificially holding back housing delivery.
- 4.4 The link between housing delivery and markets in the City Centre and the plan areas’ outlying settlements is considered tenuous, as noted at paragraph 1.42 of the Main Modifications Statement.
- “1.42 On a fundamental level in relation to the need for a phasing policy, BH&DWH considers that the relationship between delivery of housing in the District’s more dispersed rural and semi-rural settlements and the delivery of brownfield sites in the city centre is tenuous. It also fails to acknowledge cross-plan area housing market issues where the delivery of housing is linked to factors beyond those that relate to brownfield city centre land. This is particularly the case in for example Steeton, Eastburn, Silsden and Addingham, whose housing markets are more closely linked to Craven District’s plan and housing market areas than to Bradford’s.”*
- 4.5 In terms of the potential implications of the phasing policy to the soundness of the Core Strategy, as noted at paragraph 1.48 of the attached statement that:
- “The phasing policy issue is a significant one for housing delivery in the District across the plan-period. BH&DWH would not wish to see the Core Strategy Examination reopened unless unavoidable but would need to request further public consideration of the phasing policy, if not amended or removed, in order to fully consider its implications and ensure the soundness of the Core Strategy.”*
- 4.6 Two further issues relating to the Main Modifications which BH&DWH considers require assessment at the examination, are:
- Main Modification 92 and the proposed use of the ‘Liverpool method’ for addressing housing delivery. The ‘Sedgefield approach’ conforms to the paragraph 15 requirement that sustainable development should proceed without delay, as well as the strategic requirement to boost significantly the supply of housing (paragraph 47) and should be applied in order to ensure that the plan will be effective; (Main Modifications Statement paragraphs 1.51 and 1.52 apply);

- Main Modifications 100, 105 and 107 which would place unjustified design requirements on large housebuilders, which go beyond Building Regulations requirements and could impinge upon housing delivery. In relation to Main Modification 107 and the proposed imposition of space standards, at paragraph 1.61 of the attached Main Modifications Consultation Response notes, the NPPG requirement is noted:

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies.”

4.7 As noted at paragraph 1.65 of the Consultation Response:

“The Council is proposing a policy which has not been justified or viability tested. Reference to national space standards should be removed from the Core Strategy otherwise it will make the plan unsound.”

4.8 This issue therefore requires further examination at the upcoming sessions.

Ends.