

Bradford Local Plan

Core Strategy Examination

Matter 3: Revised Spatial Distribution of Development (with particular reference to Policies HO3, BD1, WD1, AD1 & PN1)

Written Statement

22nd April 2016

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?

Council's Response

- 1.1. Within the Core Strategy Policy HO3 sets individual targets for housing development for each settlement and therefore within each tier of the settlement hierarchy. The scale of housing development district wide, which provides the starting point for the apportionment, is set within Policy HO1 which itself has been based on a robust objective assessment of need.
- 1.2. Policy HO3 therefore aims to both illustrate how and where development can be located to meet the districts' housing needs and provide a clear strategic basis for the production of the Allocations DPD, the two Area Action Plans (AAP's) and any Neighbourhood Development Plans.
- 1.3. Providing clear and detailed guidance down to a settlement and sub area level ensures that the challenging issues concerning meeting the housing requirement are aired, discussed and resolved now. With this policy in place the Allocations DPD, AAP's and Neighbourhood Plans will be able to progress positively and quickly, and concentrate on the right location and blend of land uses in each settlement and on the infrastructure necessary to support that development.
- 1.4. Core Strategy Policy EC3 sets out the proposed distribution of employment land across the district. The scale and distribution of development proposed reflects the evidence gathered by the Council (including an Employment Land Review), the existing distribution of population across the district, the district's regeneration needs and priorities, and the locations best placed to attract modern industries of different types and scales.
- 1.5. Pages 163 to 171 of the Core Strategy Publication Draft explain the Council's approach to determining the apportionment of the District's housing requirement. It sets out the general principles such as alignment with the Core Strategy's vision and objectives, the application of the settlement hierarchy, the use of an initial or baseline population proportionate division of the housing requirement and then the adjustment of these quantum based on a number of tests, criteria and reality checking. These included reference to land supply, the Bradford Growth Assessment, and a sequential approach to housing growth based on minimising the reliance on land at higher risk of flooding.
- 1.6. The Council have further explained its approach within several documents (Examination library reference numbers are in brackets):
 - Background Paper 2 Housing Part 1 (SD/016);
 - Background Paper 3 Employment and Jobs (SD/018);
 - Council Further Statement Matter 4B - Housing Supply (PS/E004B)
 - Council Further Statement Matter 4C - Housing Distribution (PS/E004C);
 - Council Further Statement Matter 5- Economy and Jobs (PS/E005); and
 - Amended Housing Distribution (PS/F019)
- 1.7. Paragraph 182 of the NPPF states that a Plan can be considered sound when it is positively prepared, when it is justified, when it is effective i.e. deliverable and when it is consistent with national policy. The Council's approach to the distribution of development as modified meets these tests.
- 1.8. The approach is positively prepared in that it is seeking to meet in full the objectively assessed housing and employment needs of the district and because it is promoting a sustainable approach which aligns growth to the proposed settlement hierarchy. The settlement hierarchy in turn reflects the relative size

and sustainability of settlements across the district. The approach to distributing housing growth focuses development in greatest numbers in locations within or close to areas of greatest expected need.

- 1.9. The proposed distribution is justified as it reflects a full, robust and extensive evidence base, and represents the most appropriate option when considered against alternatives having regard to practical issues such as land supply and deliverability and policy imperatives such as avoiding and minimising impacts on the environment. Various alternative distribution options have been tested over the multiple stages of the Plan's evolution and the resultant policies have been subjected to and modified in the light of both Sustainability Appraisal and Habitats Regulations Assessments.
- 1.10. The distribution approach is considered effective in that it reflects the available deliverable and developable land supply within the Strategic Housing Land Availability Assessment (SHLAA) (PS/G004i) and the analysis within a Local Plan Viability Assessment (EB/045 & EB/046). The approach accords with national planning policy as set out within both the NPPF and PPG.
- 1.11. In November 2015, the Council published a number of modifications to the Core Strategy Publication Draft including changes to the proposed distribution of housing development as set out within Policy HO3. This also resulted in changes to linked policies i.e. Policies BD1, AD1, WD1, and PN1. Policy HO3 sets housing apportionments for 27 different settlement areas and also summarises the proposed total apportionment for each of the 4 tiers of the settlement hierarchy.
- 1.12. The modifications adjust the apportionments for 9 of the 27 settlements. The Council has sought to minimise the number and scale of modifications to those clearly required as a result of changes to evidence or circumstances. The key changes included:
 - A revised HRA in particular affecting assumptions about the implications of certain levels of growth within the vicinity of Rombalds Moor;
 - Updated land supply data within the recently completed third SHLAA;
 - A further assessment of the need to reduce or avoid potential impacts on areas of historic interest in response to concerns raised by English Heritage;
- 1.13. The rest of this statement deals with the details of these changes and the reasons and justifications for them.

Regional City of Bradford

2. 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?

- 2.1. The modifications to the housing apportionments were the result of indirect or contextual factors and direct changes in underlying evidence relevant to the settlement area concerned.
- 2.2. The Council considered that its district wide assessment of housing need was sound and that there was no justification for a change to the district wide housing requirement of 42,1000 new homes. It also considered that, with the exceptions of the settlements of Burley in Wharfedale and Menston, its classification of settlements within the settlement hierarchy was also sound, as was the use of the settlement hierarchy as a key element (though not the only element) in determining housing distribution. It was satisfied that a focus on development on the main urban areas and within the upper two tiers of the hierarchy was correct and had been followed and that the principle of defining a small number of Local Growth Centres was also correct and justified.

- 2.3. In this context given that no change to the district wide requirement was justified it determined that any increases in apportionments in settlements had to be balanced by reductions in others. In 4 settlements (Ilkley, Burley, Menston and Silsden) there were significant justifications for an uplift in housing apportionment, and in 5 settlements (Canal Road, Bradford NE, Shipley, Baildon and Haworth) there were significant justifications for a decrease in housing apportionments.
- 2.4. The Council tabled its initial proposals for modifications to the housing distribution during the Examination hearings in March 2015 and within subsequent Homework item PS/F019. Although the eventually published modifications retained the same proposals, the Council considered whether any further modifications were justified. In particular it considered whether any background and evidence that had changed such as land supply and the HRA warranted further changes in the housing and employment distribution. It considered the circumstances as they stood at the time of publication of the modifications and determined that there were no strong justifications for alternative or additional changes to the housing distribution to those tabled during the initial examination hearings. The proposed distribution as modified represents what the Council considers, based on the evidence¹, to be the most appropriate and most sustainable strategy when considered against the reasonable alternatives.
- 2.5. More specifically the modifications to reduce the housing apportionments for the Bradford NE and the Canal Road areas reflected changes in underlying evidence of the deliverable and developable land supply within the second update to the SHLAA (referred to as SHLAA 3) published in July 2015.
- 2.6. It is essential that housing apportionments within Local Plans reflect the realities of the land supply assessments within SHLAA's. The SHLAA 3 data on total deliverable and developable land supply is shown in table 1 below and indicates a clear need to reduce the Bradford NE apportionment. Although capacity within the Canal Road Corridor had slightly increased in the third SHLAA it still lay slightly below the CSPD proposed target. However as work on preparing the Area Action Plan for the Canal Road Corridor was nearing completion it was felt there was little chance that further opportunities for supply in this area could be identified.
- 2.7. The changes made to the Shipley apportionment were also informed a reduction in the capacity of land supply in SHLAA 3. However in Shipley's case the Council were also mindful of the objections raised by English Heritage at Publication Draft stage. While English Heritage did not object to the Shipley housing apportionment itself, they raised concerns that a number of Shipley sites within the SHLAA were either located within areas which the Saltaire World Heritage Site Environmental Capacity Study had identified as being important components in the setting of the World Heritage Site or which lay within the World Heritage Site Buffer Zone. Their suggested remedy, followed by the Council within Modification MM42, was to include reference to the need to protect the Outstanding Universal value of Saltaire within Policy BD1/C. English Heritage have subsequently made representations in support of both this modification and those to Policy HO3 which reduce the Shipley housing apportionment.

¹ These included the Sustainability Appraisal (PS/G004C), HRA (PS/G004h), SHLAA (PS/G004i) SHMA (EB/0052), Settlement Study (EB/040-42), Bradford Growth Assessment (EB/037), SFRA (EB/048) and Sequential Testing (PS/F060)

Table 1 : Land Supply Data and Housing Apportionments For Canal Road, Shipley and Bradford NE

	Apportionment		Total SHLAA 2 Capacity	Total SHLAA 3 Capacity		
	CSPD	Modified		Total	PDL	No. Within Green Belt
Canal Rd	3,200	3,100	3,002	3,097	1,763	0
Bradford NE	4,700	4,400	5,200	4,442	1,359	449
Shipley	1,200	750	1,793	782	329	432.5

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?

- 2.8. The Council considers that the proposed distribution reflects all these matters. Further details of how environmental constraints have been taken into account can be found within the Council’s statement for matter 4C (document PS/E004B and PS/E004C). With regard to green belt, the Council has clearly and unequivocally demonstrated the need to review and release land from the green belt in order to meet its housing and employment needs and has shown via the production of the Bradford Growth Assessment (EB/037) that there are opportunities to release land in sustainable locations which will not undermine the strategic functioning of the green belt.
- 2.9. The Core Strategy and its amended housing distribution has been informed by a range of studies related to potential environmental constraints including the HRA, a Strategic Flood Risk Assessment and a Sequential approach to avoiding or minimising development in areas of high flood risk. Evidence and assessments have been produced in co-operation with the relevant bodies such as Natural England and the Environment Agency. Both of these key bodies have raised no objections to the revised housing distribution. The distribution approach has also been informed by transport modelling of the impacts of broad strategic options (EB/039) and by a full Local Infrastructure Plan (EB/044). The SHLAA has categorised those sites lying within areas designated for their national or international importance such as the South Pennines SPA’s and SAC’s, and flood risk zone 3b as unsuitable.
- 2.10. The Council considers that it has discharged its Duty to Co-operate responsibilities and details of its approach and joint working is set out in document SD/006.
- 2.11. The Council also considers that the proposed amended distribution reflects land availability data as set out within SHLAA 3 (PS/G004i). Land supply is discussed in more detail above in paragraphs 2.5 to 2.7. and table 1 above indicates that there is sufficient land supply to deliver the proposed housing quantum.

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?

- 2.12. The amended distribution has been informed by a robust assessment of the deliverable and developable land supply set out within SHLAA 3 and the Local Plan as a whole has been subject to a Viability Assessment (EB/045 & 046). The amended distribution increases the proposed level of housing in the area found to be subject to highest levels of viability (i.e. Wharfedale - Value Area 1) within the study and reduces levels in the Regional City which the study found to have lower levels of viability. The modifications are therefore considered to have increased the confidence that the required housing quantum can be delivered.

2.13. In determining the housing distribution the Council have had regard to the need to maximise the use of previously developed land. Proposals for housing growth including for the use of brown field land must be based on the realities of the deliverable and developable land supply. Based on the evidence from the SHLAA there are no sound or deliverable options for housing distribution which would increase the use of brownfield land. The Council have set challenging but achievable targets for the delivery of housing on brown field land within Policy HO6. Land supply issues are discussed in some detail within document PS/E004B.

3. Airedale

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?

3.1. For the general context for the proposed modifications to the housing apportionment, see paragraphs 2.1 to 2.4 above.

Silsden

3.2. The increase to Silsden's housing apportionment is a result of the revised and updated HRA and its position as a Local Growth Centre. The HRA had previously indicated concerns over the proposed housing quantum within a number of settlements within the Core Strategy Further Engagement Draft (CSFED) and in particular where settlement targets might need to utilise SHLAA sites within the 2.5km buffer zone around the defined South Pennine Moors SPA and SAC. Although it was acknowledged that the presence of birds or habitats within or adjoining a SHLAA site would not necessarily render that site unsuitable for development, a precautionary approach was nonetheless advocated. This meant that housing apportionments were reduced to a level which would not need to rely on SHLAA sites within the 2.5km zone which coincided with survey returns showing supportive habitats or bird sitings. This was one of the key factors which resulted in the reduction in the proposed housing apportionment for Silsden at Publication Draft stage as opposed to that within the CSFED (although other factors were also pertinent such as the reduced overall district wide housing requirement and increased land capacity in the Regional City in SHLAA 2).

3.3. However the HRA approach was challenged in representations and at Examination hearings. Subsequent work resulted in an updated HRA and conclusion that such a precautionary approach is not necessary.

3.4. The revised HRA has fully assessed the proposed housing distribution increases in settlements within Wharfedale and also for Silsden and concluded that the Plan's housing distribution and quantum are highly likely to be capable of being accommodated without adverse impact on the integrity of the SPA or the SAC. The conclusion is taken on the basis that the Allocations DPD will be able to assess the site options and site impacts in more detail and will be able to propose, where necessary, appropriate management and mitigation measures.

3.5. Furthermore it should be noted that the Council has worked closely with Natural England in revising both the HRA and the policies and supporting text and Natural England have no objections to the proposed amended housing distribution.

Baildon

3.6. The modification reducing the housing apportionment for Baildon reflects the objections raised by English Heritage and their view that some of the sites (as indicated within the SHLAA) which might be required to meet the apportionment could impact the setting of the World Heritage Site.

3.7. Having assessed the revised and updated land supply within SHLAA 3, discussed the concerns with English Heritage, the Council considers that a modest reduction in the apportionment for Baildon is justified. The Council has not at this stage ruled out development on the sites identified by English Heritage (their assessment will be matter for the Allocations DPD) and considers that some may have potential for development. However it has balanced on the one hand the lack of any strategic imperative for a higher housing apportionment in Baildon and its position in the lowest tier of the settlement hierarchy with the fact that there are other settlements where slightly higher housing apportionments are justified. It has concluded that a lower target for Baildon which removes the risk of unacceptable impacts on the World Heritage site represents the most appropriate option within the Core Strategy.

Table 2 : Land Supply Data and Housing Apportionments For Silsden & Baildon

	Apportionment		Total SHLAA 2 Capacity	Total SHLAA 3 Capacity		
	CSPD	Modified		Total	PDL	No. Within Green Belt
Silsden	1,000	1,200	2,025.5	2,251.5	75.5	289
Baildon	450	350	883.5	830	132	477.5

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?

3.8. The Council considers that the proposed distribution reflects all these matters, see also paragraphs 2.8 to 2.11 above. The need to minimise flood risk has been incorporated within the distribution approach – see also paragraph 4.6 below.

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?

3.9. The proposed housing apportionments are deliverable over the plan period and reflect land availability information. The latest SHLAA data is presented in table 2 above. See also paragraphs 2.12 to 2.13 above.

4. Wharfedale

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?

4.1. For the general context for the proposed modifications to the housing apportionment see paragraphs 2.1 to 2.4 above.

4.2. More specifically the increases to the apportionments for Ilkley, Burley and Menston reflect the revised and updated HRA. In the case of Burley and Menston the increases also reflect the modifications to the settlement hierarchy contained within MM7 and MM8. The Council considers that Burley and Menston are both appropriate and sustainable locations for growth and their position as Local Growth Centres is fully justified.

- 4.3. The Council has explained in paragraphs 3.2 to 3.5 above how the HRA has influenced housing apportionments and how a precautionary approach which resulted in much reduced housing apportionments at CSPD stage for certain settlements including Ilkley, Menston and Burley has been proved unnecessary and unjustified.
- 4.4. The revised HRA has fully assessed the proposed housing distribution changes and concluded that they are highly likely to be capable of being accommodated without adverse impact on the integrity of the SPA or the SAC. Natural England have no objections to the proposed amended housing distribution.
- 4.5. The Council has also reconsidered the balance in how the housing apportionment to the two Local Growth Centres within Wharfedale is divided shifting the emphasis more to Burley in Wharfedale. Having reviewed the updated evidence base it considers this appropriate as Burley offers a range of site options which provide greater certainty that land can be released in ways which will minimise impacts on green belt, minimise risks of coalescence between settlements and maximise opportunities to deliver necessary infrastructure such as new schools capacity in conjunction with the planned growth. In addition SHLAA 3 data indicates that the total deliverable and developable land supply within or around Burley is now higher than that around Menston which was not the case at SHLAA 2.

Table 3 : Land Supply Data and Housing Apportionments For Ilkley, Burley & Menston

	Apportionment		Total SHLAA 2 Capacity	Total SHLAA 3 Capacity		
	CSPD	Modified		Total	PDL	No. Within Green Belt
Ilkley	800	1,000	1789.5	1,842	260	1,641.5
Burley in Wharfedale	200	700	1094	1,311.5	122	1195.5
Menston	400	600	1166.5	1,097	25.5	732

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?

- 4.6. The Council considers that the proposed distribution reflects all these matters and repeats the points made in paragraphs 2.8 to 2.11 above. In its Statement of Consultation (for example at pages 118 to 119) which responds to objections to the modifications, the Council has set out the evidence on flood risk which has underpinned the Core Strategy and how it has carried out a sequential assessment in deriving its apportionments. It has demonstrated that the vast majority of the land, district wide, required to meet those housing requirements can be met on sites within flood zone 1 which is subject to the lowest flood risk. Indeed there are sufficient sites within the latest SHLAA to meet all of the housing apportionments for Ilkley, Menston and Burley from within flood zone 1. The Council will also embed the sequential approach into the site allocations stage of plan making. It therefore considers the Core Strategy's modified distribution approach to have taken full and appropriate account at this strategic planning stage of flood risk issues.

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?

- 4.7. The proposed housing apportionments are deliverable over the plan period. See also paragraphs 2.12 to 2.13 above.

5. **South Pennines Towns & Villages**

Why has the apportionment of development to the South Pennines Towns & Villages (including the Local Service Centres [1,200-1,100] and Haworth [500-400]) been reduced from 3,500-3,400 dwellings?

- 5.1. For the general context for the proposed modifications to the housing apportionment see paragraphs 2.1 to 2.4 above.
- 5.2. The justification for slightly reducing the Haworth apportionment relates to the concerns raised by English Heritage that the proposed quantum might lead to a reliance on sites which would adversely affect the character and setting of Haworth or its Conservation area.
- 5.3. Having assessed the revised and updated land supply within SHLAA 3, discussed the concerns with English Heritage, the Council considers there is a justification for a modest reduction in the apportionment for Haworth.
- 5.4. The Council has not at this stage ruled out development on the sites identified by English Heritage (their assessment will be matter for the Allocations DPD) and considers that some may have potential for development. However it has balanced on the one hand the lack of any strategic imperative for a higher housing apportionment in Haworth, the need to preserve its landscape setting, its value as a significant tourism destination and its position in the lowest tier of the settlement hierarchy with the fact that there are other settlements where slightly higher housing apportionments are justified. It has thus concluded that a lower target for Haworth which removes the risk of impacts on these features represents the most appropriate option within the Core Strategy.

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), and the latest land availability information?

- 5.5. The Council considers that the proposed distribution reflects all these matters and would repeat the points made in paragraphs 2.8 to 2.11 above. The need to minimise flood risk has been incorporated within the distribution approach – see also paragraph 4.6 below.

Table 4 : Land Supply Data and Housing Apportionments For Haworth

	Apportionment		Total SHLAA 2 Capacity	Total SHLAA 3 Capacity		
	CSPD	Modified		Total	PDL	No. Within Green Belt
Haworth	500	400	695.5	923.5	177	407.5

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?

- 5.6. The proposed housing apportionments are deliverable over the plan period. See also paragraphs 2.12 to 2.13 above.