

Bradford Local Plan

Core Strategy Examination

Further Statement Relating to Addingham For :

Matter 1 – S Pennine Moors (Policy SC8)

Matter 2 – Revised Settlement Hierarchy (Policy SC4)

**Matter 3 – Revised Spatial Distribution of Development
(Policies HO3, BD1, AD1, WD1, PN1)**

In Response to The Following Submissions:

(PS/J004c)	Johnson Brook
(PS/J006)	Addingham Civic Society
(PS/J009)	Addingham Planning Scrutiny Group
(PS/J019)	Cllr Adrian Naylor
(PS/J023)	Barton Wilmore on behalf of Chartford Homes
(PS/J026)	Rural Solutions on behalf of Barratt Homes & David Wilson Homes

May 2016

1. Introduction

- 1.1. This statement sets out the Council response to Examination hearing statements to the MIQs issued by the Inspector and made by various parties relating to Addingham and is designed to assist the Inspector in considering the soundness of the Core Strategy and the questions posed within matters 1, 2 and 3.
- 1.2. The Council has already submitted position statements for each matter and has responded in full to the representations made at main modifications stage within its Statement of Consultation. The Council's further statements therefore merely make supplementary points particularly in relation to new matters raised by participants or points of clarification.
- 1.3. The Council have not sought in these further statements to address matters which were not the subject of main modifications and which the Inspector has made clear will not be subject to further discussion within the hearings.

2. Response to PS/J004c (Johnson Brook)

- 2.1. Johnson Brook, on behalf of a consortium of house builders, have repeated their previously made representations that the overall district housing requirement should have been set at a higher level and have re-issued the previously submitted alternative distribution which is based on that district requirement. The Council has already addressed these representations and does not wish to make any further comment on these matters.
- 2.2. Johnson Brook also repeat their objection to the proposed Addingham apportionment suggesting an alternative higher figure of 275 dwellings plus 'a reserve land' component'. It is assumed that the latter point is suggesting the allocation of safeguarded land. Again the Council considers it has already addressed these matters and has explained why it is not proposing to make any allowance for safeguarded land.
- 2.3. Johnson Brook suggest that there is more than sufficient land in the form of potential green belt releases to support a higher apportionment. The Council does not consider that the availability of land supply within the green belt around Addingham is itself sufficient reason to justify a higher apportionment given the settlement's relative sustainability, its position in the fourth tier of the settlement hierarchy and availability of other options for apportioning growth elsewhere. Moreover if land supply is taken in isolation there is additional land supply in a number of other settlements in the district which are placed within higher tiers and which would offer more sustainable development locations.
- 2.4. At paragraph 13 of Johnson Brook's matter 1 statement a number of points are made in relation to the HRA and the SHLAA. It is claimed that the Council's SHLAA is based on gross residential development areas. This needs correcting. Each of the Council's SHLAA's has adopted the same approach to the estimate of potential site yields.

Where a site has planning permission then the yield within that permission is used. For sites without permission a yield estimate is made which is the result of multiplying an assumed density range by the net developable area of the site. Paragraph 2.11 of the third SHLAA report (ref PS/G004i) explains this further. It should be noted that the approach to deriving yields was agreed with the SHLAA Working Group members.

3. Response to PS/J006 (Addingham Civic Society)

- 3.1. In their further statement Addingham Civic Society make reference to the overall housing requirement for the district which was not the subject of a main modification and which is not the subject of a further hearing at this stage. The Council therefore has no further comments to make on what it considers to be a sound, fully justified and evidenced element of the Core Strategy.
- 3.2. The society also make reference to flood risk. The Council has explained the evidence it has gathered to inform the Core Strategy (which includes a Strategic Flood Risk Assessment and sequential testing) and the way in which it has worked with the Environment Agency in a number of other statements and has addressed general flood risk related issues raised at main modifications stage in its statement of consultation. The only further point the Council wish to make is to confirm that within and adjoining Addingham, the SHLAA data indicates a deliverable or developable land supply of 1142 dwellings of which 1,048 lie within the lowest flood risk area i.e. zone 1. There are therefore considered to be no flood risk related reasons to assume that the proposed housing apportionment could not be accommodated.

4. Response to PS/J009 (Addingham Planning Scrutiny Group)

- 4.1. Again the respondent makes a number of points relating to the Plan's housing requirement which are not matters for consideration within these hearings.
- 4.2. A series of comments are made about flood risk and drainage matters. The Council considers that it has produced a robust Strategic Flood Risk Assessment in co-operation with the Environment Agency and that the Core Strategy's policies including its housing apportionment are sound. Further comments on the points raised in this and other objector hearings statements are contained in a separate further statement which picks up the flood risk issues.
- 4.3. The Council strongly refutes the suggestions made on page 3 of the Group's statement with regards to option testing. The Council has already provided evidence to the Examination of the range of housing distribution options which have been considered at the different plan making stages and it has also confirmed that it considered whether there were any options for the required limited amendments to the distribution required as a result of the updated evidence and the revised HRA.
- 4.4. The Group claim on page 3 of their statement that the revised distribution places more housing on green belt land. This is not true. There is no substantive change to the Council's estimate at this stage of the total amount of green belt land district wide

which will be required to be released. The vast majority of the redistribution has been from areas such as Bradford NE and Shipley where green belt releases are required to other settlements elsewhere where green belt releases are also required.

- 4.5. On page 3 of their statement the Group claim that Bradford's strategy is inconsistent with current Government policy that prioritises brownfield land and inconsistent with the brownfield first approach. This is also incorrect. There has been no change in Government Policy as contained within the NPPF and the NPPF does not indicate any brown field first approach.
- 4.6. As has already been explained in its previous statements the Core Strategy must be and has been based around evidence of the extent of genuinely deliverable and developable brown field land. The Council are seeking the redevelopment of brownfield land in a number of ways – through the development of individual housing schemes, via securing of funding to unlock sites in conjunction with the Homes and Communities Agency and more generally through its regeneration schemes in the City Centre and Canal Road Corridor.
- 4.7. The Government has yet to finalise its proposals and technical guidelines for the production of brownfield registers. However preliminary indications from the Government are that brownfield registers are to be based mainly on the data contained within SHLAA's and that only sites which are considered both suitable for development and which are considered deliverable will be eligible for inclusion in the registers. Brownfield registers will not and cannot create a new supply of deliverable land which does not exist. They may well assist in promoting and encouraging the development of sites which are already known and recorded within the SHLAA. Therefore the Council considers that the introduction of brownfield registers has no relevance to the housing apportionment and does not justify any changes to the Core Strategy.

5. **Response to PS/J019 (Cllr Adrian Naylor)**

- 5.1. With regards to the comments made by Cllr Naylor relating to the housing requirement the Council has already confirmed in its statement of consultation that there have been no changes to the jobs growth assumptions underpinning the housing needs assessment. The work carried out by Edge Analytics was not based on the higher jobs growth figures quoted within Policy EC2 of the Core Strategy Publication Draft.

6. **Response to PS/J023 (Barton Wilmore on behalf of Chartford Homes)**

- 6.1. The Council wishes to make some general points in response to the submissions of both Barton Wilmore and Rural Solutions. It wishes to emphasise, as it has done in its previous responses, that in formulating its modifications it has rightly assessed all the updated evidence not just the implications of a revised HRA. It is therefore simply incorrect to imply that housing apportionments should automatically revert back to their CSFED levels just because of the changes of approach which reflect the revised HRA. In effect the updated HRA on its own merely opens up the possibility of distribution options / levels which were previously ruled out. It does not mean that those options are automatically the most appropriate ones to pursue at the current time.

- 6.2. It would also be fundamentally unsound to base the proposed apportionment solely on the merits of a given target within a given settlement such as Addingham without reference to other alternatives. The proposed distribution to Addingham has to reflect the merits or otherwise of alternatives which would distribute development elsewhere. The proposed approach has to be considered the most appropriate among other reasonable options. Those reasonable options may themselves change as the evidence is updated. The Council is not proposing to return the total Wharfedale apportionment to its CSFED level of 3,100 therefore maintains that a re-distribution that focuses the increase in housing development in Wharfedale on its more sustainable settlements in higher tiers of the settlement hierarchy is a sound approach.
- 6.3. With regards to the statement made on behalf of Chartford Homes, the Council points out that the suggestion within the penultimate paragraph of page 1 of the objector's statement that 'the level of homes have been re-instated to pre-reduction levels, apart from Addingham' is factually incorrect – for most settlements the increases leave the new apportionments at a lower figure than that within the CSFED and this reflects the full updated evidence base not least the lower overall district wide housing requirement.
- 6.4. The Council considers that it has already dealt with the points made in relation to the sustainability or otherwise of Addingham and the question of whether alternative distributions or re-distributions which would take development away from other Local Service Centres and increase Addingham's apportionment have been dealt with in its statement of consultation (see pages 155 to 158) .

7. Response to PS/J026 (Rural Solutions on Behalf of Barratt Homes & David Wilson Homes)

- 7.1. In addition to the points made above, many of which are of relevance there are a number of further points relating to the submission made on behalf of Barratt Homes and David Wilson Homes which the Council wishes to make.
- 7.2. At the bottom of page 1 (summary section) of their statement, the objector advocates the re-instatement of the Addingham apportionment to the CSFED level i.e. 400 new homes. Such a change fundamentally ignores the updated evidence base and the differences between the circumstances which underpinned the Core Strategy Further Engagement Draft as compared to the Publication Draft. The housing distribution within the Publication Draft has been based on a smaller overall district housing requirement and a much increased deliverable and developable land supply within higher order settlements, in particular the Regional City. To revert to 400 dwellings within Addingham would not be justified irrespective of the revised HRA.
- 7.3. At paragraph 1.2 of their statement the respondent's suggestion that the Council has produced 'no explanation of why only three of the four settlements in Wharfedale within the Council's settlement hierarchy have seen housing numbers significantly reduced as a result of the original HRA work and then significantly increased following revised HRA work' is patently incorrect. It may not be a reasoning which the

respondent agrees with, but the Council has indicated its reasoning within its statement of consultation.

- 7.4. The Council notes that the respondent acknowledges in paragraph 1.9 of their statement that there were other reasons and evidence which underpinned the reduction in the Addingham apportionment from CSFED to CSPD i.e. that it was not just the result of the HRA.
- 7.5. The Council points to paragraph 1.13 of the respondent's statement which notes and therefore presumably accepts that sustainability issues are pertinent to the question of Addingham's housing apportionment.
- 7.6. The Council strongly disagrees with argument in paragraph 2.4 that the increases in housing numbers for Burley in Wharfedale and Menston are artificially high on the basis that Addingham figures have not been amended. Burley and Menston are Local Growth Centres within the settlement hierarchy and their total apportionment is still slightly below that within the CSFED. The Council considers that the higher numbers proposed within Menston and Burley reflect the evidence base, land supply, their sustainability and suitability as locations for some growth, and are at levels consistent with other Local Growth Centres.
- 7.7. In paragraph 3.6 the respondent suggests that 'significant green belt changes in Burley in Wharfedale may be mitigated by a more equitable distribution of housing development among Wharfedale's settlements'. The Council notes that no evidence is produced to substantiate this claim and would point out that this would not be the case since:
 - The total green belt land take would be unaltered – lowering green belt land releases around Burley would just lead to the need for green belt land release around Addingham;
 - Moreover the currently proposed Addingham housing apportionment is likely to be capable of being accommodated without green belt change but this would probably change if that apportionment were increased;
 - Green belt change around Addingham would be in an inherently less sustainable location and less well connected to the public transport network than development at Burley;
 - No evidence is provided to suggest that green belt change around Burley cannot be achieved without damaging the local or strategic functioning of the green belt;
 - Lowering the development levels at Burley in favour of increases in Addingham would undermine options to secure new infrastructure at Burley; '
- 7.8. The Council considers the analysis within paragraphs 3.7 and 3.8 to be relatively meaningless as land supply alone cannot be used to justify whether an increased housing apportionment is the most sustainable approach and moreover all the table does is to illustrate the fact that there is an ample and deliverable land supply around Ilkley, Burley and Menston to meet the proposed housing quantum and also a degree

of flexibility and surplus which will allow a range of site allocation options to be considered.

- 7.9. At paragraph 3.12 the respondent implies that there might be less landscape impact which might result from the development of sites around Addingham as opposed to other Wharfedale settlements. The Council considers that no evidence has been submitted to substantiate this claim and the respondent has submitted no detailed assessment which could be supportive of such a claim. Clearly all of the settlements within the valley lie within relatively attractive landscape settings and in each case the Allocations DPD will need to assess how sites can be selected to minimise and mitigate any impacts. However in strategic terms there is no difference between these settlements and in each there are no national or local landscape designations in place.
- 7.10. In paragraphs 3.15 to 3.18 the respondent makes reference to nearby centres and seeks to justify a higher apportionment on the back of the settlements proximity to Skipton. In the Council's view this serves to demonstrate the village's location at the north western edge of the district and the fact that it is relatively less well located and less well connected to larger employment and service centres within Bradford District and Leeds than some of the other Bradford settlements such as Burley and Menston.
- 7.11. In paragraph 3.21 the respondent makes reference to the Council's settlement study and the suggestion within it of a lack of affordable housing. The Council would make 2 points – firstly that the more robust, detailed and up to date assessment of affordable housing need lies within the Council's SHMA which indicates that the priority for the delivery of affordable homes is within Bradford and secondly that the proposed 200 dwelling apportionment will deliver new affordable homes.