

Bradford Local Plan

Core Strategy Examination

Further Statement Relating to Baildon For :

Matter 3 – Revised Spatial Distribution of Development

(Policies HO3 & AD1)

In Response to The Following Submissions:

(PS/J013)	Jo Steel on behalf of Elaine Walton
(PS/J004c)	Johnson Brook

May 2016

1. Introduction

- 1.1. This statement sets out the Council response to EIP hearing statements made by Jo Steel on behalf of Elaine Walton and Johnson Brook on behalf of a consortium of developers and is designed to assist the Inspector in considering the soundness of the Core Strategy and the questions posed within matter 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/J013 (Jo Steel on behalf of Elaine Walton)

- 2.1. The Council considers that it has provided an extensive and thorough response to the majority of the issues raised by the respondent in its statement of consultation (see pages 147 to 150) and the hearings submission by this objector repeats some of the points previously submitted and thus dealt with in the Council's response.
- 2.2. However there are a small number of points the Council wishes to make. It also wishes to explain once again the way in which the Council's SHLAA has dealt with local policy designations and in turn potential site impacts.
- 2.3. Taking the general SHLAA point first, the Council explained at the initial Examination hearings that the SHLAA incorporates a national policy on and local policy off approach. This means that for sites which lie within areas designated for their national or international importance and where national planning policy indicates that development would normally be inappropriate, such sites are categorised as unsuitable and are therefore not included within the development trajectory. However sites which are subject to designations determined locally and where development is not necessarily assumed to be inappropriate in national policy, are categorised as potentially suitable but subject to local policy constraints. In most cases the SHLAA considers, unless there is evidence to the contrary, that such sites are capable of making a contribution to meeting development quantum but clearly the final decision has to be taken in the light of much more detailed assessments to be carried out as part of the Allocations DPD.
- 2.4. While this is the general approach there will be occasions where either evidence or consultations with such parties as Historic England indicate that some of the sites within the SHLAA may not be suitable for development or may have reduced or constrained capacity. The Council therefore needs to look not only at the headline capacity and trajectory figures within the SHLAA but assess in broad terms where that

capacity is coming from and whether there are any reasons why the potential supply in reality may be less than indicated.

- 2.5. Historic England has made representations at Publication Draft stage and post completion of the SHLAA that there may be a small number of sites within Baildon which are potentially not suitable for development due to impacts on the Saltaire World Heritage Site and its setting. The Council agrees that final decisions on the suitability of these sites needs to be taken at Allocations DPD stage, however it does consider that it is prudent to consider the possible impacts on land supply if those sites were 'lost'. It is also prudent to assess whether there may be increased pressure on other sources of sites such as for larger green belt releases should any of these sites of heritage significance be discounted.
- 2.6. For the avoidance of doubt and to clarify matters for the Inspector, the Historic England's comments were made in relation to SHLAA 2 data. However things have moved on. Revised SHLAA 3 data suggests a total capacity within or adjoining Baildon of 830 units (slightly lower than SHLAA 2 which was 883). The Council understands that Historic England's concerns relate to 3 sites critical to the setting of the World Heritage Site (reference numbers BA/004, BA/005, and BA/018) which have a combined capacity of 408 units. They have also raised more general concerns about whether a number of sites which lie within the World Heritage Site buffer zone may be constrained. Of these there are 3 (BA/007, BA/008, and BA/011) which are also of particular concern to the Council and these have a further capacity of 91 units. Thus while the Council would not necessarily assume that all of these sites will eventually be considered unsuitable, it does need to take account of the fact that the overall capacity within Baildon could theoretically be reduced to just 331 units.
- 2.7. Moving to other matters within the respondents submission, the Council wishes to re-affirm that it strongly disagrees with the assertion made by the respondent that the reduction in the housing apportionment is premature and that the consideration of the amount of housing within the settlement should be left to a later date.
- 2.8. The Council would not be able to demonstrate that it has produced a sound plan containing the most appropriate strategy for the distribution of development if it had not assessed key strategic issues and evidence and considered the potential environmental impacts of the various housing distribution options. The Council has received representations from English Heritage raising concerns about the potential impacts of a number of sites on the Saltaire World Heritage Site and its setting. In a situation where there are other alternative and sustainable options for the distribution of development it is entirely reasonable to pursue a slightly amended alternative. It would not be a prudent or appropriate approach to knowingly pursue a housing quantum which might not be deliverable and then have that confirmed during work on the Allocations DPD. This would threaten the quick progress of the Allocations DPD to adoption and potentially delay much needed delivery of new housing across the district as a whole.
- 2.9. Much of the respondents statement relates to the promotion of the claimed merits of the site at The Rowans on the edge of Baildon (site BA/004 within the SHLAA). The

Council do not propose to comment on what is essentially a matter for the site Allocations DPD to assess, however the site is a good example of the issues which might affect some of the current SHLAA sites as it is one with which both Historic England and the Council's own Conservation team have raised concerns in relation to potential impacts on views both to and from the World Heritage Site.

- 2.10. Within section 3 of the respondents statement reference is made to meeting housing need in Saltaire. The Council points out that no specific evidence is provided as to the suggested housing need in Saltaire – the fact that Saltaire is ‘a desirable housing location’ does not mean that there is either a need or a justification for development. Moreover the site which the respondent is promoting does not form part of Saltaire and is locationally and topographically separated from it.
- 2.11. The Council considers that there is nothing within the Bradford Growth Assessment which supports the case made by Mr Steel. Indeed the study indicates that around half of the area around the settlement lies within the World Heritage Buffer Zone which is termed a medium constraint. The study compares and contrasts the potential for growth around the various Local Service Centres by reference to both the extent of ‘unconstrained’ land around each one and in relation to their sustainability characteristics. The study points out that some Local Service Centres such as Cullingworth have more unconstrained land (see pages 78-79 of the Local Service Centre Volume of the study, reference EB/037).
- 2.12. Finally the Council does not consider the arguments made in the respondents’ section dealing with delivery are credible or justified. The Council has no doubts that the proposed housing quantum can be delivered within Silsden. There are fundamental errors and misunderstanding in the assumptions and calculations made by Mr Steel. For example he takes no account of the fact that the housing quantum covers the period from 2013 and thus housing completions between 2013 and his assumed local plan adoption date of 2018 will already have reduced the remaining requirement to be met over the remainder of the plan period.

3. PS/J004c (Johnson Brook)

- 3.1. The Council has no further comments to make on the matters raised by Johnson Brook which are covered either by the Council’s Statement of Engagement or in the paragraphs above.