

Bradford Local Plan

Core Strategy Examination

Further Statement Relating to Haworth For :

Matter 1 – S Pennine Moors (Policy SC8)

**Matter 3 – Revised Spatial Distribution of Development
(Policies HO3, & PN1)**

In Response to The Following Submissions:

(PS/J030) Barton Wilmore on behalf of Harworth Estates

May 2016

1. Introduction

- 1.1. This statement sets out the Council response to EIP hearing statements made by Barton Wilmore on behalf of Harworth Estates relating to Haworth and is designed to assist the Inspector in considering the soundness of the Core Strategy and the questions posed within matters 1, 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/J006 (Barton Wilmore on behalf of Harworth Estates)

- 2.1. With regards to Barton Wilmore's matter 1 statement and in particular their paragraph 15, the Council wishes to emphasise that the contents of the HRA were not a major determining factor in the reduction of the Haworth housing apportionment proposed within the Core Strategy Publications Draft as compared to that of the earlier CSFED (in the sense that the Haworth target was not significantly impacted by concerns over the loss of potentially supporting habitats within the 2.5km zone around the SPA). Table 2 within the Council's Background Paper 1 (SD/015) shows that there were no SHLAA sites which coincided with observed birds or habitats.
- 2.2. Therefore, unlike settlements such as Ilkley, Burley and Menston, the reversal of the precautionary approach to addressing potential SPA / SAC impacts now applied via the main modifications does not provide any sort of justification for a higher housing apportionment at Haworth. The circumstances as they apply to Haworth are, contrary to the impression given by Barton Wilmore, very different to those within some of the settlements within Wharfedale. The reduction in the Haworth target between CSFED and CSPD stages had far more to do with the fundamental change in the land supply situation which allowed a general re-distribution away from the Local Service Centre tier in favour of the Regional City.
- 2.3. With regards to paragraph 5 of their statement it should be pointed out that only part of the settlement of Haworth – the central and western sections lie within the 2.km zone around the S Pennines SPA / SAC.
- 2.4. Within paragraphs 8 to 12 Barton Wilmore make a number of references to the terminology used by Historic England (previously English Heritage) in their submission which highlight concerns about a number of SHLAA sites within or which adjoin the village. They refer to phrases used such as 'could harm the setting' and 'does not appear to be great enough'. The Council would suggest that such language is entirely

reasonable, reflects the strategic plan making stage that has been reached, and considers that such language in no way diminishes the significance of the objection. Clearly such an objection would not have been made if Historic England were not of the view that development in those locations may be harmful.

- 2.5. With regard to paragraph 14 of the Barton Wilmore submission on matter 3, the Council considers that it has made the reasons for its proposed reduction in the Haworth housing apportionment clear and that they relate to a range of factors including the potential adverse impacts which a number of SHLAA sites may have on the conservation area, the position of Haworth in the bottom tier of the settlement hierarchy and the availability of other more sustainable options elsewhere for the proposed units.
- 2.6. The Council does not at this stage consider it either appropriate or necessary to carry out detailed site by site appraisals to determine whether a site in isolation would be likely to be allocated. This is a process for the Allocations DPD. It does however have to analyse the land supply as presented within the SHLAA and assess its make up in sufficient detail to determine any strategic issues or constraints which might influence the housing apportionment. Heritage and conservation area impacts are one example and the Council must take account not only of the potential for those sites to be discounted but also the nature of the remaining land supply options for that settlement.
- 2.7. The Council does not deny that the potential concerns raised by Historic England only affect a relatively modest proportion of the overall land supply of Haworth. For clarity the Historic England concerns are made in relation to SHLAA 2 data and relate to sites HA/011 and HA/014 which have a combined capacity of 150 units. In addition Historic England have more recently contacted the Council to state that they would have concerns about one of the new SHLAA 3 sites (HA/022 – West Lane) which has a capacity of 9 units, giving a total concern over 159 units of the supply.
- 2.8. While the loss of 159 units in relation to the total SHLAA 3 land supply of 923 units may appear to be modest, its significance should not be dismissed given the make-up of the remaining SHLAA land supply which has a relatively low proportion of 'suitable now' sites and a significant dependence on green belt sites none of which have been fully assessed within the context of a Green Belt Review. It should be noted that the increase in capacity between SHLAA 2 and 3 is mostly the result of new green belt options rather than unconstrained sites.
- 2.9. In its statement of consultation (pages 151-152) the Council has concluded that if there is a reasonable level of doubt over whether targets can be achieved without adverse effects and also if there are clear alternative distribution options which would avoid the risk of adverse effects then it is a reasonable, balanced, evidenced and appropriate decision to make that change and pursue those alternatives.
- 2.10. It has also stated that it is not sufficient to assess whether a given apportionment for Haworth would be appropriate in isolation but has to assess whether there are other more sustainable options or alternatives, which there clearly are.
- 2.11. The Council notes that the objector has provided no significant positive argument—either strategic or local in nature as to why a higher target than 400 homes is needed. The Council can see no strategic benefits gained or problems solved which would be

addressed by a housing target of 500 which would not be addressed by a target of 400 new homes.

- 2.12. The Council has pointed out that Haworth sits within the bottom tier of the settlement hierarchy and therefore in broad terms is relatively less sustainable as a location for growth than other locations such as Ilkley, Burley, Menston, and Silsden. The Council notes that the objector does not appear to be making any argument that there is no justification for increasing the housing targets at settlements such as Burley, Menston and Ilkley. Given a fixed district wide housing requirement the modest adjustment upwards of some settlement apportionments must therefore be matched by downward adjustments elsewhere.
- 2.13. At paragraph 17 of its matter 3 statement, the objector suggests that the Council's approach is premature as it is not consistent with Historic England's document 'The Historic Environment and Site Allocations in Local Plans' which advocates more detailed underpinning environmental evidence and analysis. However this is not a valid point as the document referred to is advocating the evidence required to underpin a site allocations plan not a strategic plan such as a Core Strategy which does not actually allocate sites.
- 2.14. At paragraph 21 of its matter 3 statement Barton Wilmore state that the Council submitted the Core Strategy at Publication draft on the basis that a housing apportionment of 500 dwellings for Haworth was appropriate. While this may be the case the judgment made was based on the evidence and circumstance at that time and was made in relation to the reasonable alternatives (or lack of) at that time. As the Council has demonstrated, the revised HRA has re-opened the possibility of distribution options which it considered were not available to it at the time of publishing the CSPD. There are now reasonable alternatives which allow the Council to make a very modest reduction away from settlements such as Baildon and Haworth to other settlements higher in the settlement hierarchy.
- 2.15. Also in paragraph 21 the objector makes an assertion that the reduction in the Haworth housing target means that developers of specific sites will not be allowed to submit site specific evidence (presumably to the Allocations DPD) regarding historic matters relating to their sites. The Council find this perplexing. The Core Strategy is not allocating sites, nor is it publishing a list of sites which can or cannot be considered to implement the settlement quantum. The amended settlement target does not remove the ability of the objector to pursue and advocate its site within the Allocations DPD process.
- 2.16. At paragraphs 23 to 28 the objector makes comments regarding the alleged sustainability of Haworth and makes comparison with the settlement of Silsden based on a very narrow and partial and selection of criteria. The Council considers that Haworth is appropriately placed in the least sustainable tier of the settlement hierarchy and Silsden appropriately designated as a more sustainable Local Growth Centre. It is not aware of any argument from the objector previously or at this time to suggest that these two settlements have been inappropriately designated within the settlement hierarchy.
- 2.17. At paragraph 28 Barton Wilmore contend that at Publication draft stage the Council considered a target of 500 was 'necessary'. However this is misleading – a more accurate depiction would be that at the Publication Draft stage the apportionment of 500 dwellings within the overall housing requirement was considered appropriate given the alternative options and the evidence at that time.

- 2.18. At paragraph 34 Barton Wilmore make reference to the Bradford Growth Assessment and quote the fact that only 0.8% of the land contained within a 500M zone around the settlement is constrained by conservation area. The Council considers this relatively meaningless. Given that the land in question comprises the countryside beyond the built up area it is not surprising that only a small percentage falls within the Conservation Area. It is still described by the study as a constraint.
- 2.19. The Council considers that there is nothing within the Bradford Growth Assessment to support a higher housing figure for Haworth. Page 26 of volume 2 of the Local Service Centre volume notes that “ the number of new dwellings should ideally be limited to a level which would avoid significant adverse impact of existing local services and facilities, or the character and setting of the settlement.” The table in the summary section at page 64 indicates that only 30% of the area around the settlement edge (which covers a 500M zone of search where possible green belt releases would need to be identified) is unconstrained and that this proportion is much lower than some other centres.