

Bradford Local Plan

Core Strategy Examination

Further Statement Relating to Ilkley For :

Matter 1 – S Pennine Moors (Policy SC8)

Matter 2 – Revised Settlement Hierarchy (Policy SC4)

**Matter 3 – Revised Spatial Distribution of Development
(Policies HO3, & WD1)**

In Response to The Following Submissions:

(PS/J001)	Cllr Martin Smith
(PS/J004c)	Johnson Brook
(PS/J008)	Ilkley Civic Society
PS(J/017)	Barton Wilmore on behalf of Persimmon Homes
(PS/J027)	Cllr Jack Rickard
(PS/J005)	Alan Elsegood / WARD

May 2016

1. Introduction

- 1.1. This statement sets out the Council's response to Examination hearing statements to the MIQs issued by the Inspector, made by various parties relating to Ilkley 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/J001 (Cllr Martin Smith)

- 2.1. In his further statement Cllr Smith makes 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 have addressed the issue which Cllr Smith raises relating to jobs growth projections in its statement of consultation (see pages 76-77) and confirmed that the housing need assessment was never based on the higher jobs growth figures contained in Policy EC2 of the Publication Draft. The Council has no other further comments to make on what it considers to be a sound, fully justified and evidenced element of the Core Strategy.
- 2.2. Councillor Smith raises the issue of flooding. The Council has addressed the broad approach to assessing flood risk in its statement of consultation (see pages 118 to 120) and considers its approach to be sound. Further comments addressing flood risk issues is contained in a separate further statement which responds to the flood risk issues.
- 2.3. The Council has also responded in its statement of consultation (pages 166-169) to the issues relating to brown field land and in its hearing statement for original matter 7B (PS/E007b). The Government requires that Local Plans and their policies, including those relating to previously developed land are informed by robust land availability information. The policies within the Core Strategy have been based on a full and comprehensive assessment contained within its SHLAA. Government policy on brown field land as contained within the NPPF has not changed.
- 2.4. Another key feature of the Council's approach is to ensure that there is a degree of certainty about housing delivery and therefore the Council has opted not to include in the plan an allowance for windfall. It has opted to ensure that sufficient land is actually allocated /identified to meet the proposed housing quantum. Small contributions from

vacant units above shops would fall below the threshold for inclusion within the SHLAA and the Allocations DPD and would be windfall. It would be wrong to include an allowance for a source of supply over which there is both uncertainty as to the level of potential and uncertainty over the level of actual demand for that type of accommodation. The Council also notes that Councillor Smith has provided no evidence to back up his assumptions about quantum of land which might come forward from such sources.

- 2.5. Councillor Smith makes reference to brownfield registers which are in the process of being introduced by the Government. However the Government has yet to finalise its proposals and technical guidelines for the production of brownfield registers. Moreover 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.
- 2.6. On page 2 of the Councillors further statement, reference is made to empty homes. The Council re-affirms that it has included an assumed reduction of 3000 in the number of empty homes and that the housing requirement has been amended accordingly. Within the initial hearings the Council has explained that it has a programme and strategy for the reduction of empty homes which will support that assumed 3000 unit decrease.

3. Response to PS/J004c (Johnson Brook)

- 3.1. In paragraph 2 of their matter 3 statement Johnson Brook state 'throughout this process we have concluded that evidence on the level of the requirement is in excess of 42,100 (a point acknowledged by the Council in describing their requirement as 'at least' 42,100 homes)'. The Council have made no such acknowledgement.
- 3.2. The Council have responded to Johnson Brook's proposed alternative higher housing quantum for Ilkley within its statement of consultation (see page 120). The Council considers that the proposed apportionment as modified reflects the status of Ilkley as a Principal Town. The figure for new homes reflects the land supply and also the fact that scope needs to be left for the allocation of other uses in addition to housing such as new employment land, infrastructure and possible areas of new greenspace. The objector provides no specific justification for their higher figure.

4. Response to PS/J008 (Ilkley Civic Society)

- 4.1. With respect to the comments made by Ilkley Civic Society relating to matter 1, the Council can confirm that the modified housing distribution has been tested within the updated HRA. The HRA and the response of Natural England indicates that the

proposed levels of housing development are likely to be capable of being accommodated without adversely affecting the integrity of the SPA & SAC given the opportunities for careful site selection and incorporation of management and mitigation measures.

- 4.2. The only other points the Council wishes to make are
- it has met in full its duty to co-operate obligations and has explained how it has done so in its statement (ref SD/006);
 - no changes have been made to green belt policy within the NPPF which invalidates the Council's approach or changes the fact that there is a clear and unequivocal justification to make changes to the green belt boundary to meet the district needs over the plan period; and
 - flood risk issues are addressed in a separate further statement.

5. Response to PS/J027 (Cllr Jack Rickard)

5.1. The Council have taken into account the need to use a sequential approach to minimising the use of land in higher flood risk zones and this informed the Publication Draft housing distribution and has been updated since in the light of the new SHLAA data and the need for modifications to the housing distribution. The updated data actually shows a reduced overall need to utilise land in higher risk zones largely as a result of the increased land supply options within the City Centre. The Environment Agency has raised no objections to the modified housing distribution.

5.2. A separate further statement has been produced to address flood risk comments and issues.

5.3. Response to PS/005 (Alan Elsegood / WARD)

5.4. The Council has no further comments to make on this statement as it mainly covers issues not the subject of a further hearing (housing requirement), and issues debated at the previous Examination hearings and thus addressed previously (infrastructure and transport).

