

Q and A Responses - Session 17: Airedale – 11th March 2021

Session Questions / Matters Raised	Response
<p>Could the presenters talk through the process of how they go from the total housing allocation in Bradford to how many per area (e.g. Bingley, where I live). I am asking this as some areas seem to have a lot more housing allocated than others, in relation to their current size.</p>	<p>Policy SP8 sets out the overall approach / methodology - also worth a review of the technical note in relation to SP8 on the council's evidence base webpage. Housing Growth - Policy SP8 - Technical Note (bradford.gov.uk)</p> <p>Spatial distribution is informed by ensuring:</p> <ul style="list-style-type: none"> - Housing growth is where possible concentrated on areas where the need is greatest. - The need for new homes is met in a sustainable way which supports the district's economy and reflects planned changes in infrastructure. - The distribution proposed maximises the benefits of development (for example making good use of brownfield land and securing investment and improvement in key regeneration areas). - Minimises environmental impacts - for example directing development towards areas of lowest flood risk and avoiding significant impacts on areas designated for the value e.g. wildlife habitats, open space - The proposed housing distribution is deliverable and reflects the realities and constraints of land supply - The distribution reflects the settlement hierarchy as set out in Policy SP3. <p>The population baseline is the general starting point, but then evaluated against a range of variables as set out above.</p>
<p>More specifically, is Green Space availability taken into account when deciding how many houses per area? And if so, what metric is used (Friends of the Earth have one here for example Access to green space in England Are you missing out?</p>	<p>The Council is looking at the option of introducing a green infrastructure standard (EN1) and looking for feedback on this emerging policy position and approach / standard. On more specifically open space standards, this is developed through Policy CO1 with standards of provision set out in Appendix 11 to the plan. There is a divergence across the District in the quantity of different types of open space by settlement area. This is covered in detail in the technical audit evidence on open space provision:</p> <p>https://www.bradford.gov.uk/Documents/BDLP/Evidence//Open%20Space%20Audit%20Report%202021.pdf</p>

<p>Do developers suggest an area which is then assessed or do Bradford Council look for an area and then see if the owner wishes to develop. i.e. is it push or pull? Not sure if this is the right term but hopefully you know what I mean!</p>	<p>See also response above in relation to SP8.</p> <p>The sites arise from a range of sources. In many cases sites are submitted to the Council by landowners and agents over a number of years sometimes through 'Call for Sites' exercises but site are also identified by officers through other sources – site visits and urban capacity studies. In some cases, sites are also declared surplus to requirements in terms of the Council's estate and these are also included within the 'long list' of sites at the start of the evaluation. The overall database of sites is captured through the Strategic Land Assessment (SLA).</p>
<p>I'm still unhappy this is going on in lockdown.</p>	<p>Government has placed a strong focus upon local planning authorities to progress with developing up to date local plans and have these in place before the end of 2023. Government has also changed the planning regulations to enable Councils to consult online and temporary removed the requirement to deposit hard copy material in deposit locations (including libraries). This plan is at an early stage of development and the process to finalising the plan can take a considerable period of time. Leaving consultation on the development of the plan until later in the year will introduce a delay to producing the plan and while Government has set out an exit strategy from lockdown, it is a cautious strategy and one which could be reviewed depending upon progress made fighting the pandemic. You will note some of the challenges in Europe currently in terms of managing additional waves of infection. The online nature of the consultation and extensive use of social media has potentially introduced a wider range of people to the plan consultation and the representation figures are healthy in terms of volume and coverage of areas.</p>
<p>I'm afraid I can't see the content & I'm not able to zoom into these slides. Is it available via email?</p>	<p>Presentation material is available for download on the Council's website:</p> <p>https://www.bradford.gov.uk/planning-and-building-control/planning-policy/bradford-district-local-plan/</p>
<p>Why are sites B14/H and B18/H in Eldwick considered to be 2 sites? Is it because of land ownership? And could development start on B18/H before or without development on B14/H as that would be a nonsense... you say this is early days but a consultant / developer has been on the</p>	<p>The sites would have originally been submitted as separate Strategic Land Assessment (SLA) sites. Ideally the sites would need to come forward in a co-ordinated comprehensive manner and this may need further attention within the potential policy directions for the site(s).</p>

Eldwick site B14/H at least twice (out taking selfie photos on Tuesday...)	
I'm afraid I cannot be as grateful as this LP still erodes the very green belt that makes this area pleasant and healthy to live in. If you can simply remove green belt the hypocrisy is breathtaking. The government ads are exhorting 'each bit of space matters' yet you remove what you please. By LP admission, some of these sites erode the buffer destroying the 'distinct' environment	Comments noted. The plan sets a methodology for the assessments of sites, defines the housing and employment requirements, sets out a logical approach to distributing growth and makes an exceptional circumstances case for limited growth within the Green Belt. Much of the work is also defined with area plans linking key policy directions together at a settlement / area level.
<p>The Eldwick sites are more than a 15 min walk from the services at Bingley - and are of course 100m up a hill - not an active walking community</p> <p>This is simply the thin edge of the wedge - even the not felt to be appropriate sites will simply wait</p> <p>oh I forgot to mention the H&S issues on the lane and mini roundabout</p>	Comments noted in relation to walking distance and proximity to services / facilities. The sites are located within approximately 100m of a bus stop on a regular 30 minute per hour service. A further analysis of accessibility will be undertaken for many of the sites. Further work will be undertaken through the Strategic Transport Model (STM) on traffic impacts.
<p>Eldwick Primary school is at full capacity and the priory area reviews are contentious and disruptive</p> <p>The secondary schools - Bingley and Beckfoot are over subscribed</p> <p>I fought really hard for Eldwick Primary to be expanded to a 3 form entry and it wasn't an option - the new build /</p>	For the forecast period 2020/21 to 2024/25 the pupil planning areas for primary provision in Bingley are currently showing an overall surplus, which follows trends in other parts of the District with demand / pressure on places now moving towards secondary school provision. As noted in the session, further work will be progressed with education colleagues as part of the Local Infrastructure Plan (LIP) on pupil forecasts and school capacities.

extensions (to create 2.5 entry) won't easily facilitate an increase to 3 form entry - I was chair of governors at the time	
I will have a number of questions about sites in Long Lee.	Questions discussed in the session – see also Session 20 notes and Keighley East Session notes.
the segi and bwa area by meadow side road was not mention, but this area is as valuable esp in terms of flora and fauna, why has this not been recognised by the Council... That's Baildon area	Thank you for identifying. Please include within your representation submission.
No-one has been able to answer our question as to why the consultation is only online. This excludes anyone who isn't on the internet. How do you think this is fair and equitable?	See comments noted above in relation to consulting on the plan during lockdown.
At what stage do you look at the type of housing at a site, is it at this stage or later	At this stage in plan-making some thought is applied to housing densities which implies a particular housing typology – for example mix of family housing (semi-detached and detached) if achieving densities of circa 35 dwellings per hectare net. Much more detailed work will be undertaken as part of the plan development particularly on standard typologies to inform education work on potential pupil yield.
And that's without mentioning that your docs say these 2 developments would have a major impact on the Greenbelt - sprawl - openness - etc why have these Bingley sites been rejected? when Heights Lane is still there...	<p>A degree of professional planning judgement is used when considering the impact of development on the Green Belt. This is explored in detail in the various Green Belt studies and methodology:</p> <p>Green Belt 1.0 Overview Paper (bradford.gov.uk) – good starting point in Green Belt evidence.</p> <p>In areas where there may be a moderate or high impact on the Green Belt there may still be opportunities to mitigate that impact and ultimately sites need to be considered as to whether they deliver sustainable development in the round. This is likely to lead to the prioritisation of some sites above others when it comes to finalising preferred sites options.</p>

Why was BA/010 (Otley Road at Tong Park) rejected for housing? This could ease pressure on more intrusive breaches of the existing Green Belt around Baildon's rural edge. More broadly, where are the rejection justifications recorded for all sites?	<p>Headline information on rejected sites is contained within this publication:</p> <p>Site Assessment and Rejected Sites Background Paper (bradford.gov.uk)</p> <p>SLA site BA/010 was rejected on the grounds on trees, surface water and site topography.</p>
It seems fairly small number of houses, given the impact it will have on the open spaces around Bingley	A smaller number of houses may have a more limited impact on open spaces and new developments would need to ensure appropriate levels of open space provision.
Why are the maps blurred?	This is a lower res pdf version on the screen due to file size.
Baildon - with exception of a small part of site ref BA/008B all Baildon sites are Greenfield and 3 of the 6 are Green Belt. What proportion of all the Airedale 8000+ housing unit requirement are on 'brownfield' in this draft plan?	<p>The overall target for Airedale is 4,335 dwellings, made up of:</p> <p>Keighley -2,200 Bingley – 850 Silsden – 700 Steeton with Eastburn – 175 Baildon – 250 Cottingley – 150 East Morton – 10</p> <p>This target is a very significant reduction when compared to the apportionment to Airedale in the adopted Core Strategy of 8,450 (though it should be noted that the overall district wide housing requirement within the Core Strategy was also much larger and the Core Strategy covers a slightly different plan period of 2013-30).</p> <p>After discounting current commitments (sites with planning permissions), the Local Plan identifies 74 new sites in Airedale, which can accommodate 2,690 homes before discounting. 22 of these sites are on sites which are either wholly or partly previously developed or 'brownfield' sites and have a total indicative yield of 787 units. In addition, the plan is proposing that 250 units will be delivered within a broad area of search focused on the centre of Keighley all of which are likely to be brownfield sites. This equates to 38.5%.</p>

	With regards to commitments, the total yield being carried into the Local Plan from these sites (before a discounting is applied) is 1,049 units. 31 of these are brownfield sites with 478 units remaining.
Castlefields site has one of the oldest mills in Bingley. What protection for the heritage?	<p>The plan places a strong emphasis on heritage protection and the sensitive reuse of heritage assets where appropriate. On the historic environment generally worth a review of policy EN4 within the plan. The Council has also published more technical information on the approach to Heritage Impact Assessments and examples of where HIAs have been carried out at this stage.</p> <p>https://www.bradford.gov.uk/Documents/BDLP/Evidence//Heritage%20Impact%20Assessment%20Report.pdf</p>
Excellent comments from participants - if you are looking at the infrastructure alongside the next stage; isn't that leaving the residents in a difficult position to counter these	The Council has started to look at infrastructure issues as part of the plan development but recognise that further work is required. The Local Infrastructure Plan (LIP) is a live working document which captures key infrastructure issues alongside the development of the local plan. It is likely that informal discussions / work with local communities and stakeholders between Regulation 18 and 19 on a range of plan-related matters including infrastructure planning will help inform the LIP and planning policy / site directions and detail.
This is also a significant issue in Silsden. There are already two large developments, totalling about 300 houses, with no green space at that end of the village at all.	Thank you for raising – we are hoping the policy frameworks we are putting in place with this plan will help establish the right level of open space / green space on new developments and ensure a balance approach to growth.
Why is Bingley being designated as a Principal Town? Has the local community ever been consulted on this designation? How is Bingley the same as Keighley and that distinct to Baildon?	SP3 sets out the hierarchy of settlements within the District and forms part of this consultation. The use and articulation of a settlement hierarchy in guiding and controlling the distribution of growth and development is a well-established planning tool. The Principal Towns within the District are Ilkley, Keighley and Bingley, as identified on the Key Diagram. They vary in size and function but fulfil a District wide significant role as service, employment and transport hubs for their surrounding areas. While on a smaller scale than that within the Regional City, these towns will be a main focus for the provision of new housing and will provide an important focal point for services, facilities and employment – complementing and supporting the roles of the Regional Cities of Bradford and Leeds.

What opportunities will be provided to engage with developers and meet with local planners with proposals e.g. re Sty Lane Greenhill. Greenhill Action Group have made good proposals to improve the site Design and Access statement but developers have not offered to meet?	Thanks for the comments – will pick-up with development management colleagues.
I note the guidance on education, sport and recreation provision in the appendices. Is this being proportionally applied to CIL?	<p>The most up to date information on infrastructure income and outgoings is captured in the published Infrastructure Funding Statement –</p> <p>https://www.bradford.gov.uk/media/6150/infrastructure-funding-statement-2019-20.pdf</p> <p>The statement has not been evaluated for proportionality, but further work is required on s.106. CIL and developers' contributions to support the next iteration of the plan.</p>
There is much reference in these sessions to 'encouraging' and 'expecting' developers to do certain things. Does Bradford have the power to 'require' developers to do anything that is additional to Government standards?	The policies within the plan will set a strong local framework against which planning applications are considered. The planning system in England is plan-led and the development plan / local plan should be the starting point for decision-making.
Are any of the sites identified for employment or housing in the Aire Valley being proposed as mixed development sites?	The sites have generally been split by employment or residential. There may be however some instances – particularly within town centres where residential-led developments could incorporate a degree of employment uses. The definition of mixed use will be more clearly set out within the next iteration of the plan.