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Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Mr.	
First Name	[REDACTED]	
Last Name	Appleyard	
Job Title <small>(where relevant)</small>	[REDACTED]	
Organisation <small>(where relevant)</small>	Addingham Civic Society	
Address Line 1	[REDACTED]	
Line 2	Addingham	
Line 3	[REDACTED]	
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	<input type="text"/>	Date: <input type="text"/>

Personal Details & Data Protection Act 1998

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district.

Please note that the Council cannot accept any anonymous comments.

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	4.3	Paragraph	A,B	Policy	WD1
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	X
4 (3). Complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.

If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Introduction

In submitting these comments, the Civic Society has attempted to follow the Council’s guidance notes and use the standard representation form. This has proved difficult in a number of respects - many policies in the Plan are inter-linked, and it is not always possible to cover one topic by reference only to one policy – in fact the Core Strategy document itself lists multiple policies as being relevant in many cases. For example Policy SC5 (Location of Development) states it is to be read along with other Strategic Core Policies and with Policies HO2, HO3, HO4, HO6, HO7 and EC3. Some grouping of comments and different policies is therefore inevitable.

New Housing in Addingham

Addingham is classed as a Local Service Centre in the Plan’s Settlement Hierarchy (Policy SC4, para 3.60) where “the emphasis will be on smaller scale developments which meet local needs.” The Plan also states (para 3.75) that in Local Service Centres, there will be “a much slower pace and scale of growth.....with development being focussed on meeting local needs”. Para 5.3.64 relating to housing distribution states that Local Service Centres are considered to be “the least sustainable locations for growth within the District” with “development focussed more on meeting local needs”. The section on Outcomes (para 4.3.4) states that by the end of the Plan period, Addingham “has retained its character and sense of

place whilst meeting local needs for affordable housing and local facilities”

Sub Area Policy WD1: Wharfedale identifies Addingham for “the creation of 200 new homes to meet local needs and associated community facilities.”

The Civic Society strongly supports these statements and the policy to limit new housing in the village to **local needs** only. However, neither the Core Strategy nor any of the supporting documents contain any information or evidence defining and assessing the extent and nature of “local need”. The figure of 200 houses has been produced by distributing the District-wide requirement proportionately and then adjusted according to a range of factors described in paras 5.3.39 to 5.3.64 and Policy HO3.

The figure of 200 is clearly not related to actual identified local needs. The proposed 200 houses is therefore not **Justified** (based on **credible and robust evidence**), which is one of the key tests of **Soundness** which the Plan must meet (see Soundness check-list on the Council’s Local Plan web-site). This is re-stated in the Plan in the section on Evidence Base (para 2.10) which states that it is important that the policies and proposals in the Core Strategy “are based on an up-to-date, robust and reliable evidence base.....”

In these circumstances, the figure of 200 houses must only be considered as an **absolute maximum** (see also the section below relating to Habitat protection).

Furthermore, the Civic Society requests that Bradford Council works closely with the Society and other relevant bodies to make a detailed assessment of local housing need in the village which can then inform further stages of the plan process including the Allocations DPD.

Green Belt

As well as the numerical distribution of new development to Wharfedale settlements, Sub Area Policy WD1 also refers to development locations in individual settlements. In all settlements (Ilkley, Addingham, Burley in Wharfedale and Menston) the Plan states that there are “opportunities for development through infill whilst retaining the character of these places” (para A). The Plan also states (para B) that there will be contributions from “green belt changes” in Ilkley and Burley in Wharfedale. For Addingham, there is no reference to any green belt changes. In addition, the Summary Leaflet on the Core Strategy produced by the Council for the 6-week representation period on the Plan specifically states that “**To meet housing needs overall, there will be Green Belt releases in all settlements apart from: Addingham, Menston and Silsden**”.

The focus on infill locations and absence of proposals for green belt changes in Addingham are strongly supported and welcomed by the Society. It is noted that the Core Strategy is the

“top-level” document, setting out key policies and proposals, and as stated in para 1.3 regarding the purpose of the Local Plan, the Core Strategy “will also **give some certainty to communities** and development industry in particular provide the local planning policy framework for communities that are producing Neighbourhood Plans”. The Society understands that this means the Core Strategy policies (if approved) can be relied upon and not be undermined by subsequent work or future proposals, particularly where these might affect key elements such as the green belt.

Once the extent and nature of local housing need has been identified as suggested above, the Civic Society would be interested in further joint working with the Council in order to identify and agree suitable, sustainable sites for housing development aimed at meeting identified local need.

Habitat Protection

Notwithstanding the above comments in relation to the Plan's proposals for new housing in Addingham, Policy SC8 relating to Habitat protection is relevant. Addingham is in close proximity to two protected habitat areas – the South Pennines SPA/SAC (within Bradford District/West Yorkshire) and the North Pennines SPA/SAC (within North Yorkshire). Fig. 6.1 in the Habitats Regulations Assessment report (February 2014) shows that the whole of Addingham lies within the 2.5km Supporting Habitat Mitigation Zone of both protected areas. This is confirmed by plotting boundaries and sites at a large scale. Furthermore, Appendix 111 of the report relating to mapping of SPA/typical birds, supporting habitats and SHLAA sites, describes several potential development sites as “SHLAA 400m with supporting habitat”, whilst all sites fall within the description “SHLAA 400m with SPA birds and waders”.

Policy SC8 relating to Zone A and Zone Bi would therefore appear to directly affect potential development in Addingham, and the Society welcomes the stated approach of restriction/prohibition and precaution when considering locations for new development in the village, including the strong presumption against Greenfield development. It is noted that Natural England made very detailed and extensive comments on the Core Strategy (Further Engagement Draft) in their letter of 19 January 2012, and these should inform the implementation of the Plan in relation to the location and scale of new development and potential impact on habitats.

Phasing the Release of Housing Sites

Policy HO4 sets out the approach to the phasing of new housing development. The Society welcomes the statement at HO4. C. 7. that work on detailed site allocation (in the Allocations DPD) will “need to ensure an **even delivery pattern** within smaller settlements and rural areas where sites are **aimed at meeting local and affordable housing need** over the **whole period** of the LDF”. The emphasis on “smaller scale developments which meet local needs” (para 3.60) and “much slower pace and scale of growth” (para 3.75) are also relevant and are strongly supported. These policies and proposals clearly indicate that growth in the village, recognised as amongst the least sustainable locations in the District, should be small-scale and organic, and spread evenly over the plan period in accordance with local needs, rather than anticipating large land releases.

Windfall Sites

When assessing land availability to meet the overall District housing requirement, no allowance has been made for the contribution of small windfall sites. This does not comply with official guidance as set out in a Ministerial Statement by the Minister for Planning in March, issued to provide clarification on a number of issues, including that windfall sites can be counted towards the overall land requirement (set out in Local Plans) over the whole of the plan period.

In small rural settlements in particular, such as Addingham, windfalls from conversions of premises to residential use and small developments of one or two houses can make a very significant contribution to overall requirements over the plan period, and an allowance should be made for this in allocating new sites for development. This would also comply with the policies above relating to small-scale and slower paced provision of new housing.

Historic Environment

Policy EN3 relating to the District’s heritage assets and their settings is also welcomed, as Addingham has a wealth of listed buildings and an extensive Conservation Area. The importance of the village’s built heritage and landscape setting re-emphasise the need for future development to be limited and small-scale, enabling any growth to be organic and preserving the character of the village.

Green Infrastructure

Policy SC6 includes reference to the River Wharfe as a strategic infrastructure asset. The Wharfe runs alongside the village and is a very important part of its character as well as having major wildlife, habitat and leisure functions. The green corridor of the river and its associated environments should be better defined and protected. The Plan should have set

out policies and proposals for this key corridor, rather than relying on future work.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy WD1 in relation to Addingham should be amended to state that:-

In Addingham, new housing provision will be determined following a detailed assessment of local housing need and be met through small-scale, organic development identified via local consultation and the preparation of a neighbourhood plan.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To elaborate on the Society's representations and answer any relevant questions.

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:	<input type="text"/>	Date:	<input type="text"/>
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