

Manchester M3



Bradford Local Plan Group
City of Bradford Metropolitan District Council
2nd Floor South, Jacob's Well
Nelson Street
Bradford
BD1 5RW

Date: 31st March 2014
Ref: 29915/JC

Dear Sir/Madam,

Bradford Core Strategy Development Plan Document – Publication Draft - Representation

This representation is submitted on behalf of our client, Countryside Properties (UK) Limited, who have land interests in Silsden.

Context

Bradford is required to identify land for 45,000 new homes and the current SHLAA has identified the potential for 38,000-40,000; a shortfall of around 5,000-7,000 therefore exists. The Council have recognised that a new approach will be needed in order to ensure that sufficient land is made available to deliver their future housing requirements. Land currently safeguarded in the Bradford Replacement Unitary Development Plan will therefore be required to help meet these requirements and Green Belt release is also considered as being necessary.

The spatial vision and the area policies relate to 4 areas- the City of Bradford which for the purposes of the Core Strategy includes Shipley and Lower Baildon; Airedale which includes Bingley, Keighley, Silsden and Steeton with Eastburn; Wharfedale which includes Ilkely, Menston, Burley in Wharfedale and Addingham; and the south Pennine Towns and Villages including Queensbury, Thornton and Haworth.

The following comments relate specifically to individual policies contained within the Bradford Core Strategy Development Plan Document Publication Draft, with a particular emphasis on those relevant to development in Silsden.

Comments on Specific Policies

Strategic Core Policy (SC1): Overall Approach and Key Spatial Priorities

This policy seeks to "Support, protect and enhance" the role of Silsden as a Local Growth Centre, acting as a hub for the local economy, housing and community and social infrastructure.



Comment: Countryside Properties fully support this policy as it will positively support the strategic growth of Silsden, which is a highly sustainable settlement capable of supporting the delivery of a significant level of new housing developments.

Strategic Core Policy 4 (SC4): Hierarchy of Settlements

Countryside Properties support the identification of Silsden as a Local Growth Centre within the settlement hierarchy and the acknowledgement that it should make a significant contribution towards meeting the districts needs for housing, employment and provide for supporting community facilities.

Further support is offered towards the acknowledgement that Silsden is identified as an accessible, attractive and vibrant place to live and work.

Comment: The need for new housing to be delivered in the area to support this growth and investment should be emphasised within the wording of the policy.

Suggested re-wording: Local Growth Centres paragraph B should be made to read "investment should be enhanced" and not "invest should be enhanced."

Strategic Policy 5 (SC5): Location of Development

This policy also needs to make reference to land currently safeguarded in the Bradford RUDP. There is no reference to the allocation of previously identified safeguarded sites from the RUDP or the future allocation of safeguarded land. This source of development land should be identified as a second priority area alongside 'other Greenfield opportunities within the settlements', above Green Belt releases to the built areas of settlements in sustainable locations.

Comment: Policy SC5 should identify existing safeguarded land as a second priority area when considering appropriate locations for development.

Strategic Core Policy 7 (SC7): Green Belt

Countryside Properties support the release of Green Belt in order to help deliver the longer term housing needs of the borough.

Sub- Area Policy AD1 Airedale

The policy states that "Silsden will see the creation of 1,000 new homes with associated community facilities and the creation of Silsden Rural Business Park. Supporting highway infrastructure will be provided together with good walking and cycling links to Silsden and Steeton railway and bus interchange station."



Comment: Countryside Properties support the wording of this policy and welcome the importance that significant levels of new housing will have on ensuring that Silsden fulfils its role as a Local Growth Centre. The delivery of the allocated 1,000 homes will help to support local services and businesses and meet the local strategic aims for Silsden set out within Policy AD1. Where possible, this policy should acknowledge housing delivery as a priority for driving growth in Silsden.

Sub Area Policy AD2: Investment for Airedale

Countryside Properties fully support the requirement for more investment to be introduced in the Local Growth Area of Silsden. The delivery of 1,000 homes will help the Council to meet this strategic aim of growth. The release of appropriate Green Belt sites in sustainable locations that meet the necessary accessibility standards is also supported.

Comment: Reference should also be made within the policy to the important role that Safeguarded Land surrounding Local Growth Areas (including Silsden) has to play in order to support vital housing and economic growth.

Policy HC2: Strategic Sources of Housing Supply

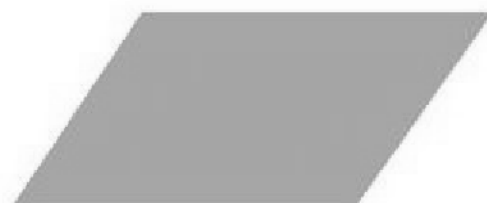
Countryside Properties support this policy and the recognition that Safeguarded Land sites identified within the RUDP will need to come forward for housing development in order that the housing requirements set out in Policy HO1 can be met.

Countryside also support the need for local green belt releases to be brought forward where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area. This will allow sites in sustainable locations to be brought forward within the plan period, helping to ensure the council will meet the strategic delivery targets set within Policy HO1.

Comment: Countryside remain supportive of this policy, but an early review of green belt in locations identified for growth, such as Silsden in its role as a Local Growth Centre, should take place in order that a strategic and comprehensive view is taken with regards to the most effective way to deliver the housing needed within the settlement.

Policy HC3: Distribution of Housing Development

Countryside Properties are fully supportive of the housing distribution targets set for the borough of Bradford and the 1,000 identified as being required within the Silsden area.



Policy HO7: Housing Site Allocation Principles

Countryside Properties are supportive of the wording of Policy HO7 and the need to allocate sufficient deliverable and developable sites to meet the targets set out in Policies HO1 and HO3

Land at Keighley Road, Silsden

Countryside Properties have land interests in Silsden, situated to the east of Keighley Road, immediately adjacent to the southern boundary of the settlement. The majority of the land in their ownership lies within Safeguarded Land, with some also located in the Green Belt.

Deliverable site

The site is available now, as it is in the ownership of a national housebuilder with an excellent track record of delivery who have a commitment to deliver housing at the site.

The site is suitable, as it is in a highly sustainable location:

- Benefits from excellent public transport links (Steeton & Silsden railway station 900m away; frequent daily bus services are available adjacent to the site on Keighley Road)
- Located within 550m of the town centre of Silsden, which provides a wide range of shopping and leisure facilities
- Located within close proximity to a wide range of employment facilities located, such as the employment areas to the south of Silsden, the town centre and other nearby locations such as Airedale General Hospital hospital (2.6km) and the business/industrial parks located to the north west of Steeton (3.6km)
- A number of primary schools are in close proximity to the site, namely Aire View Infant School (600m), Hothfield Junior School (700m) and Steeton Primary School (1.4km), whilst a secondary school, South Craven School, is just 3.3km away and is well served by a school bus service that runs past the site through Silsden.

The site is also developable as a significant level of technical work has been undertaken to demonstrate that residential development is capable of coming forward at the site.

Key site for Silsden

Silsden is identified as a Growth Area under Policy SC1 and Policy AD1 sets out that Silsden should deliver around 1,000 dwellings throughout the plan period. It is clear that the development of safeguarded land for residential development should be prioritised and from a deliverability perspective, it is clear that the land at Keighley Road is the most appropriately placed to site to contribute towards this target in the short term.



Conclusion

Countryside Properties are generally supportive of the Bradford Core Strategy as drafted, subject to the recommended modifications that have been set out in this representation. Countryside remain keen to maintain a positive working relationship with officers at Bradford throughout the remainder of the plan preparation process and would be happy to discuss the content of this representation further, as well as any specific issues relating to the land at Keighley Road.

We would be grateful if you could confirm safe receipt of this representation.

Yours sincerely

