

**Replacement
Unitary Development Plan
for the
Bradford District**

Inspector's Report

**Bradford South
Constituency
Volume**

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Chapter: 4 Urban Renaissance

SOM/BS/UR4/259: Wilson Road, Wyke, Bradford

Objector

3178/10962 *H Birkby & Sons Ltd*

Summary of Objection

- The site should revert to a phase 1 housing site.

Inspector's Reasoning and Conclusions

4.1 This site is safeguarded for longer-term development, and hence is subject to Policy UR5, not Policy UR4. I have therefore considered the matter under that policy.

Recommendation

4.2 **I recommend that no modification be made to the RDDP.**

SOM/BS/UR4/347: Broomfield, Queensbury

Objector

194/10573 *P J Wade Ltd*

Summary of Objection

- The land should be allocated for housing.

Inspector's Reasoning and Conclusions

4.3 This land adjoins Black Dyke Mills, and I have considered an objection relating to the use of that site later in this report. The objector requests that part of the employment allocation be changed to phase 1 housing, and this land would be an extension of that development to be developed in phase 2 of the plan period.

4.4 In considering objections to the overall provision of housing land, I have concluded that there is insufficient land allocated for housing. This is land within the urban area of Queensbury, close to local facilities and bus routes giving access to larger settlements, and is a sustainable location for new housing, in accordance with the locational strategy of the RDDP. I see no objection in principle why it should not be so allocated. I am satisfied that an access can be provided from Brighthouse Road, through the Black Dyke Mills site and, although I have some reservations about the effect of increased traffic on the already congested local road network, these do not outweigh the benefits of developing this site within an urban area, in a very sustainable location. Whilst the objector has requested that this site comes forward in the latter part of the plan period, I see no reason why both this and the adjoining land should not be developed in phase 1.

Recommendation

- 4.5 **I recommend that the RDDP be modified by the allocation of land at Broomfield, Queensbury for housing under the terms of Policy H1.**

BS/UR5.1 (formerly H2.5) & SOM/BS/GB1/296: Roper Lane/Halifax Road, Queensbury

Objectors

2464/12542 *Accommodate UK Ltd*
2937/7791 & 10334 *Mr P J Bartle*

Summary of Objections

- The site should be deleted in favour of more sustainable locations closer to Queensbury centre.
- The drains/sewers are overloaded, there would be a traffic hazard, and there are limited school places.
- The site should remain Green Belt.

Inspector's Reasoning and Conclusions

- 4.6 This site was allocated for housing in the FDDP, and the objection by Mr Bartle was to that allocation. He has not made specific representations on the proposed allocation as safeguarded land, but similar considerations apply and I have therefore considered the objection as being in respect of the currently proposed designation. Accommodate UK Ltd made similar representations in respect of both proposals.
- 4.7 The Council recognises that there are some constraints to the development of this land, in terms of the site contours, access and drainage. Also, it is not a particularly sustainable location, being some distance from most local services in Queensbury, although it adjoins a 10-minute bus route. I agree with the Council's view that it should not be developed within the plan period, and I have some reservations about whether it will come forward in the future. However, I see no fundamental objection to it being developed once more sustainable sites have been taken up. It is therefore appropriate that it should be retained as safeguarded land.
- 4.8 The land is not currently within the Green Belt, and PPG2 advises that once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. I do not consider that there are exceptional circumstances to justify altering the boundary to include this land.

Recommendation

- 4.9 **I recommend that no modification be made to the RDDP.**

BS/UR5.2 (formerly H2.7): Lower Woodlands Farm, Oakenshaw (SOM/BS/OS1/164, SOM/BS/OS7/164, SOM/BS/GB1/164 & SOM/BS/NE9/164)

Objectors

268/12543	<i>Mrs Muriel Butlin</i>
549/12129	<i>Mr Philip Nutter</i>
4290/12134	<i>Mr Simon Hoskins</i>
4291/12132	<i>Mrs Mary Payne</i>
4978/12284	<i>Highways Agency</i>
4995/12464	<i>S E Ainscoe, A Ainscoe & B Reed</i>

The objections to the former allocation of the site for housing are listed in the appendix to this report.

Summary of Objections

- Loss of local beauty spot and wildlife habitat; it should be re-classified as Green Belt or urban greenspace.
- Poor access and increased traffic congestion.
- Danger of flooding
- Brownfield sites should be developed before greenfield.
- Local services are over-subscribed.
- The site is near hazardous chemical storage.
- Loss of buffer between Oakenshaw and the M606.
- The phrase “having poor access on the edge of the urban area” should be deleted.
- Development here would create additional car-based movements at M606 Junction 1 and M62 Junction 26. Off-site highway works may be required.
- The site should be allocated as a phase 1 housing site.

Inspector’s Reasoning and Conclusions

- 4.10 There was a considerable number of objections to the inclusion of this site as a phase 2 housing site and, although several of the objectors supported the current allocation as safeguarded land, only two of the original objections were withdrawn. It appears that many of the concerns expressed are applicable to the current proposal, and I am therefore considering the original objections to the housing allocation, as well as those specifically related to Proposal UR5.2.
- 4.11 This is an attractive area of countryside alongside the M606 motorway, and is adjoined by development on the remaining boundaries. Access to the site is currently from an unadopted road, and the Health and Safety Executive (HSE) advises that the site falls within the inner safety zone for one hazardous industry, and within Zone 2 of another.
- 4.12 Whilst I can appreciate that local residents would like to see the land remain open, I do not consider that it is of sufficient landscape or nature conservation interest to preclude development for all time, although any development would need to take account of the existing watercourses, and the amenity and wildlife interest associated with them. Also, being surrounded by built development, this land would not be suitable for inclusion in the Green Belt. The site is well located in relation to local services and public transport in Oakenshaw, and there would appear to be ways of overcoming the present access difficulties.

- 4.13 However, without confirmation from the HSE that housing would be acceptable, I consider that it would be inappropriate to allocate the site for housing at the present time. Nor is it appropriate to allocate the site as safeguarded land because it is within the urban area, and hence would not conform with the definition of safeguarded land in PPG2. Also, such an allocation would imply that the site is suitable for development at some future time. Therefore, I consider that the site should remain unallocated and, if the risk of developing within the hazardous safety zones can be shown not to be an overriding constraint, and a satisfactory access can be achieved, the site could come forward for development in a future review of the plan.

Recommendation

- 4.14 **I recommend that the RDDP be modified by the deletion of the safeguarded land allocation BS/UR5.2.**

BS/UR5.3 (formerly H1.27): Wilson Road, Wyke

Objector

3178/12499 & 12500 H Birkby & Sons Ltd

Summary of Objections

- The site should revert to a phase 1 housing site.

Inspector's Reasoning and Conclusions

- 4.15 The site was formerly a quarry and brickworks which has now been filled. It was allocated as a housing site in the FDDP but was deleted following a consultation with the Health and Safety Executive which advised that the site falls within the inner hazardous safety zone for two chemical works in the vicinity of the site. The objector suggested that this need not preclude development and the Council should balance the level of risk against the benefits of re-using land within the urban area.
- 4.16 The site is well located for residential development, being close to local facilities, and with reasonable bus accessibility to Bradford and Huddersfield. However, without more detailed information as to the likely risks from the two chemical works, I consider that it would be inappropriate to allocate the site for housing at the present time.
- 4.17 The Council is concerned that land should not be left unallocated as this would lead to uncertainty. However, it would be inappropriate to allocate the site as safeguarded land because it is within the urban area, and hence would not conform with the definition of safeguarded land in PPG2, and also such an allocation would imply that the site is suitable for development at some future time. Therefore, in this particular case, I consider that the site should remain unallocated. If the risk of developing within the hazardous safety zone of the chemical works can in the future be shown not to be an overriding constraint, development could proceed and the resultant housing gain could be counted as a windfall.

Recommendation

- 4.18 **I recommend that the RDDP be modified by the deletion of the safeguarded land allocation BS/UR5.3.**

SOM/BS/UR5/165.02 & SOM/BS/GB1/165: Brighthouse Road, Queensbury

Objector

2464/10333 & 11008 Accommodate UK Ltd

Summary of Objections

- This land should be removed from the Green Belt and designated as safeguarded land.

Inspector's Reasoning and Conclusions

- 4.19 This site lies to the east of land which the objector has requested be included as a housing site. I have considered this objection later in the report, and recommend that the site be removed from the Green Belt and allocated for housing. This land would form a logical extension to the housing allocation and, in view of the shortfall in housing land, I consider that this also should come forward as a phase 2 housing allocation.

Recommendation

- 4.20 **I recommend that the RDDP be modified by the removal of land at Brighthouse Lane, Queensbury from the Green Belt and its allocation for housing under the terms of Policy H2.**

SOM/BS/UR5/267, SOM/BS/UR5/281 & SOM/BS/UR5/292: Land at Julian Drive & Lingfield Terrace, Clayton Heights, Bradford

Objector

4317/10394, 10779 & 10784 Mr E Upite

Summary of Objections

- The land should be removed from the Green Belt and allocated for housing or safeguarded land.

Inspector's Reasoning and Conclusions

- 4.21 I have considered these objections in relation to SOM/BS/H1/267, SOM/BS/H1/281 and SOM/BS/H1/292 below, to which reference should be made.

Recommendation

- 4.22 **I recommend that no modification be made to the RDDP.**

BS/UR11.1: Odsal Stadium Action Area

Objectors

954/3033 & 12299	<i>Government Office for Yorkshire and the Humber</i>
3868/5565	<i>Mr F Scott</i>
4137/6987 & 12689	<i>Yorkshire Co-operatives Properties Ltd</i>
4138/5037 & 12690	<i>Wm Morrison Supermarkets Plc</i>
4215/6990	<i>Asda St James</i>
4218/6992 & 12082	<i>The Mary Street Estate</i>
4287/5040 & 12697	<i>Somerfield Stores Ltd</i>
4313/5056	<i>Asda Stores Limited</i>
4117/12698	<i>Alfred McAlpine Special Projects</i>
4119/12696	<i>Lattice Property Holdings Ltd</i>
4148/12694	<i>Raven Retail Ltd (Ex Carter Commercial)</i>
4978/12285	<i>Highways Agency</i>
5021/12692	<i>Miller Developments (Northern) Ltd</i>
5026/12686	<i>NHS Estates</i>
5027/12687 & 13003	<i>Mr David Carter</i>
5028/12691	<i>Kirklees Metropolitan Council</i>
5041/13004	<i>Bradford Bulls Holdings Ltd</i>
5047/13030	<i>Mr David Warburton</i>

Summary of Objections

- The policy should state more definitely the type of development which would or would not be acceptable in addition to the new stadium, and should not anticipate exceptions. Proposals for significant amounts of A1, A3, C1 and D2 development would need to be justified in relation to national guidance and the Council's strategy. References to the development brief should be in the justification. The revisions do not overcome the concerns about justification of non-stadium development.
- Adequate traffic arrangements must be made, which may require off-site highway works.
- The policy should be amended to indicate that the Council supports the redevelopment of Odsal stadium and that any ancillary development must satisfy other policies within the UDP.
- Retail development is not justified as enabling development and could have significant impacts on the vitality and viability of existing centres.
- The policy should address the need for any enabling retail and commercial leisure development to comply with PPG6.
- Only development directly necessary to enable the development of the stadium should be permitted.
- Reference to high value uses should be deleted.
- Delete the Odsal Stadium Action Area policy and reinstate the housing allocation to the Northern View Hospital site.
- The policy should specify the range of sports facilities to be provided.
- There should be a policy in the plan to enable the continuing use of Odsal Stadium as a multi-sports venue, including motorsport events.
- The need for redevelopment and extended facilities should be reflected in the UDP.
- There should be an amended Odsal Stadium Action Area, including the Richard Dunn Sports Centre and the former Northern View Hospital.

Inspector's Reasoning and Conclusions

- 4.23 The inclusion of the policy for the Odsal Stadium Action Area reflected a specific proposal for redevelopment that the Council was minded to approve. However, this proposal was not proceeded with, and the Council re-assessed the policy in the light of Government guidance, including the revised version of PPG17, and published a proposed change to delete the policy, and include a housing allocation on the former Northern View Hospital site.
- 4.24 This would satisfy a number of the objections which concerned the scale of enabling development envisaged, and some of these have been conditionally withdrawn. There were, however, three objections to the proposed change.
- 4.25 Odsal Stadium is clearly an important venue for sport, currently as a rugby league ground but formerly also for motorsport. A number of improvements have been carried out since Bradford Bulls took over a long lease from the Council, but more remains to be done to bring the stadium up to modern standards. Whilst the stadium operators accept that the large-scale proposals originally envisaged for the area will not now take place, they consider that there needs to be some additional development to enable the stadium improvements to be carried out. They consider the use of the Northern View Hospital site for housing would limit the potential for such development.
- 4.26 Whilst there are no firm proposals at present, sport and leisure related development was referred to. The Council advises that uses such as leisure, fitness gymnasias, retail, hotels or food and drink would normally be permitted provided the development is of a scale that will accommodate the needs of the local community, and it is in accordance with PPG6 and PPG13. This would appear to allow for more intensive development within the existing stadium curtilage, subject to accessibility by a choice of means of transport and taking into account the impact on the city centre and other smaller nearby centres. However, a scale of development that would require the additional land currently occupied by the Richard Dunn Sports Centre and the site of the former Northern View Hospital is unlikely to conform with Government guidance. I therefore consider that it would be inappropriate to continue to identify this land for development associated with Odsal Stadium.
- 4.27 I have considered whether there would be merit in a replacement policy statement, along the lines suggested by one of the objectors, which would refer to the importance of Odsal Stadium for rugby league and motorsport, and indicate that development proposals consistent with the retention and improvement of this use will be permitted. Whilst such a statement would be an acknowledgement of the existing situation, it would have limited value in assessing new development proposals, and I consider that the other policies of the plan provide sufficient guidance.

Recommendation

- 4.28 **I recommend that the RDDP be modified by the deletion of the Odsal Stadium Action Area as proposed on pages 47 and 48 of the Council's proposed changes, dated January 2003.**

Chapter 5 Economy and Employment

BS/E1.1: Ingleby Road, Girlington, Bradford

Objector

4149/6796

Western House Investments

Summary of Objection

- The site should not be restricted to core employment uses nor require provision for a single user.

Inspector's Reasoning and Conclusions

- 5.1 The site is somewhat irregular in shape and located within a major employment area to the west of the city centre. It has a limited road frontage, the greater part of which is occupied by a retail tyre sales and service business. Adjacent uses include industry, distribution and retailing, and the site is close to housing areas where it is stated that levels of unemployment are high. The site is bounded on the north by the steep-sided valley of the Bradford Beck.
- 5.2 It is argued that the restriction to core employment uses is unreasonable in view of the nature of nearby uses and the inability to generate interest in the site for development for such restricted uses. Whilst no intensive marketing of the site has occurred it is claimed that it is well-known to employers and agents in the Bradford area, and contacts with neighbouring occupiers has not resulted in any positive expressions of interest. In addition, site development constraints imposed by the restricted access, the proximity of the watercourse and potential problems due to possible landfill and contamination require high value uses in order to make development commercially viable. Similarly, the requirement to reserve a site of 3 hectares for a single user places a major constraint on the development of the site, which has a developable area of only some 3.25 hectares.
- 5.3 I accept that it is necessary to seek to ensure that important sites are retained for core employment uses and not lost to other activities, and that sites are available for single users. However, the objection site is not in a prominent location that is often desired by core employers and single site users. Whilst the marketing of the site has not been extensive I consider that the physical and policy constraints are likely to have had a significant impact on the level of interest. In addition, the site is known to the Council in terms of its economic regeneration activities, and no evidence was presented to demonstrate any development interest. I consider that the site is not of high quality and that it is unlikely to generate significant interest from core employment providers. Furthermore, in the light of the expressed need to generate local employment opportunities, I consider that allowing a wider range of employment uses would be beneficial.
- 5.4 In addition, the requirement to provide a single site of 3 hectares in a total developable area of only some 3.25 hectares essentially restricts the site to a single development. In my consideration of Policy E2 I have recommended that the single user requirement should be expressed as a significant part of the site, being some 50% of the site area, or 3 hectares, whichever is the smaller. I consider that this modification would be important

to the development prospects of this particular site. If such modification is accepted I consider that Policy E2 should continue to apply to this site. If it is not accepted, Policy E2 should not be applicable.

Recommendation

5.5 I recommend that the RDDP be modified as follows:

- [a] The restriction to core employment uses on this site should be removed;**
- [b] Policy E2 should only apply to this site if it is amended in accordance with my recommendation in relation to Policy E2.**

BS/E1.7 & SOM/BS/OS1/170: Staithgate Lane North, Odsal, Bradford

Objectors

1568/265 & 7971 *Mr Michael McTague*
1662/257 & 8415 *Mrs Gabrielle McTague*

Summary of Objections

- The site is close to an area of nature conservation interest and should be retained as urban greenspace instead of being allocated for employment.

Inspector's Reasoning and Conclusions

5.6 The nearest Bradford Wildlife Areas are some distance from the site and I have no compelling evidence that the objection site or its surroundings are of any significant nature conservation importance. The area of the adjacent golf course provides a wildlife corridor.

5.7 Conversely, there is a need for good quality employment sites in strategic locations. The objection site is well located in terms of local, regional and national transport networks and is close to established employment and residential areas. I consider that allocation of the site for employment use is necessary and appropriate.

Recommendation

5.8 I recommend that no modification be made to the RDDP.

BS/E1.11, POL/BS/BH15 AND SOM/BS/GB1/6: Cross Lane, Westgate Hill, Bradford

Objectors

1459/1783 & 4083 *English Heritage*
2792/5850 *Commercial Development Projects Ltd*
3860/6604 & 10494 *Mrs R Skinner*

Summary of Objections

- The site of the Civil War battle was further east than the objection site and the battlefield is incorrectly shown on the Proposals Map.
- The need for the economic development outweighs the historic importance of the land.
- Business development would be totally incompatible with battlefield designation.
- Policy BH15 should be reworded.
- The majority of the allocation should be included in the Green Belt.

Inspector's Reasoning and Conclusions

The Location of the Battlefield

- 5.9 The climax of the Battle of Adwalton Moor took place on Adwalton Moor itself, near the settlements of Drighlington and Adwalton, which are now in Leeds Metropolitan District. Much preliminary fighting occurred in hedged enclosures west of the moor, and the Parliamentary forces also deployed somewhere to the west of the moor, having marched along the ridge from Bradford in an attempt to surprise the Royalists. The objection site lies on this ridge.
- 5.10 The area of the battle has changed considerably since 1643 but there are clues to the location of events then, in the form of eyewitness and similar contemporary accounts. Sir Thomas Fairfax is a major source. He commanded the Parliamentary right wing and was the son of Lord Fairfax, the overall commander of the Parliamentary army. Another Parliamentary account is that of Thomas Stockdale who accompanied Lord Fairfax. There is also brief mention of the battle in the memoirs of Captain Hodgson, who fought here. The main Royalist accounts are one probably written by the then Earl of Newcastle, who led the King's army in the North, and one written by his wife.
- 5.11 Critics of the English Heritage delineation of the battlefield argue that the hill referred to by Fairfax is in fact the hill south-east of the objection land, and not Westgate Hill, west of the objection site. If this is so, in my opinion the objection site would still have played a part in the battle. Fairfax says that the Parliamentary forlorn hope gained the hill by beating the Royalist forlorn hope off the hill. It seems to me very unlikely that the objection area was not involved in this action, because the employment allocation includes the western slopes of the hill. The vanguard of the Parliamentary force would have been behind the forlorn hope, on the western part of the allocation. The presence of the Inmoor Dyke would have made the position difficult for deployment but in an encounter battle the Parliamentarians would have had to put up with this. Thus even though it is difficult to interpret historical sources, here as elsewhere, the most critical evidence against the location of the registered battlefield boundaries does not have the effect of removing the objection land from the battlefield.
- 5.12 There is further support for the argument that the whole of the objection land was involved in the deployment and battle. Captain Hodgson says that the Parliamentarians were formed up towards Wiskett Hill, which may be Westgate Hill. This seems to be indicated by the 1725 map of the manor of Tong. Recently discovered cartographic evidence suggests that the first stage of the battle took place on and west of Westgate Hill. The account by Stockdale has a relatively lengthy report of how the Royalists manned houses standing in the enclosed ground between Bradford and Adwalton Moor, and sent out great parties of both horse and foot by the lanes and enclosed grounds to

oppose Lord Fairfax. The forlorn hope beat the Royalists out of the lanes and enclosed grounds, and then the Parliamentary van and main battle beat the Royalists out of the houses they had manned. All this suggests the preliminaries to the main part of the battle took place over an area of significant extent west of Adwalton Moor. It appears that there was a group of houses and enclosures along the Bradford road at Tong Lane End, close to the objection land.

- 5.13 The account of the Earl of Newcastle does not appear to range so widely geographically, but he as commander would have arrived on the field after the preliminaries, in this action. However, the Royalist cavalry were drawn up in an area of coal pits. The main such area on the battlefield seems to have been west of Adwalton Moor, and the Parliamentary army would have been further west again.
- 5.14 The absence of artefacts from the objection site is not necessarily an indicator that neither fighting nor deployment took place there. Archaeological investigation of a battlefield and the interpretation of results are not straightforward matters. Other known battlefield locations in England lack finds.
- 5.15 I do not agree with those objectors who argue that the objection land was not involved in the battle and should not be included in the battle site.
- 5.16 The changes which have taken place in the landscape since the battle do not mean that the battlefield is no longer of historical value. The railway embankment near Hodgson Lane is placed to one side. Whether the present day hedgerows and hedgerow remains represent similar features which were present in 1643 is a matter of dispute, but the topography and open nature of the majority of the battlefield can be appreciated despite the new road which cuts across it. From the area around the junction of Cross Lane with the A650, it is possible to appreciate the earlier stages of the battle. The footpath east of The Plantation allows access to the enclosures in that part of the battlefield. The remaining open land of Adwalton Moor is also accessible, as is Warrens Lane down which Sir Thomas Fairfax's wing might have retreated towards Halifax.

Compatibility of Battlefield Designation and Employment Allocation

- 5.17 The north-western part of the land has received planning permission for development (application No. 99/02789/OUT, permission notice issued 18 May 2000), and some has been developed, with a consequent radical change to the landscape in that area of the site. English Heritage does not object to the allocation for employment of the north-western sector. It does object to the allocation of the remainder. At present the objection site is largely open, allowing the early moves in the battle to be followed. Public views are available from roads, and private study is possible no doubt if the landowners allow access. The outline planning permission affecting part of the land includes provision for a public viewing area. Building on the open section of the objection site would render it of much less use for the purposes of studying and appreciating the battle, and would destroy most of the ground surface and any archaeological remains. The archaeology of the site could be recorded but would no longer be available for analysis in the future, using techniques which are presently in their infancy or which have not yet been developed. Buildings and associated works would alter the site so much that a reworded policy which nevertheless allowed development would not be of any use.
- 5.18 A significant length of the battlefield is visible at present from the area of the roundabout where Cross Lane meets the new A650. Buildings would obstruct this view, and it

appears that Commercial Development Projects Limited has agreed to keep open an area in the northern part of the site which would have the effect of preserving a view of the battlefield from the northern part of the allocation.

- 5.19 I do not see how any significant development could fail to conflict with Policy BH15. The historic, archaeological and landscape interests of the site, and the potential for interpretation, would all be harmed.
- 5.20 My conclusion is that the battlefield designation on the Proposals Map is not compatible with the employment allocation, where that allocation has not yet been taken up.

Employment Need and Historic Importance

- 5.21 There is a need to increase employment in Bradford. Although the Council does not use terms like “prime site” when referring to the land, the site is close to important road links and is flat enough to be readily developable. The district could ill afford the loss of the site. However, I attach considerable weight to the inclusion of Adwalton Moor on the English Heritage Register of Historic Battlefields, a national register containing only a limited number of sites. The battle was instrumental in persuading Parliament to make an alliance with the Scots, leading eventually to the loss of the North by the King. The open nature of substantial parts of the battlefield is also a weighty consideration, because it makes interpretation possible.
- 5.22 I conclude that the need to keep this part of the battlefield open outweighs the economic need for the allocated development.
- 5.23 The adopted UDP makes this employment allocation. However, there is no indication that the battle or the registration of the battlefield were taken into account at all in the preparation or adoption of the UDP. Some objectors also refer to the infrastructure provision which has been made in preparation for development, and to ERDF funding. No doubt these have helped to support the development which has already occurred, but this expenditure and work too seem to have been undertaken in ignorance of the battle.
- 5.24 I conclude that the allocation should be modified to preserve the open nature of the battlefield, its topography, and any other features which remain from the time of the battle, including the archaeology of the site. English Heritage has provided a plan which delineates the area which could be developed without causing further material harm to the battlefield, and I adopt this expert evidence as the basis for my recommendation. However, it seems to me that the area north of the Inmoor Dyke which has planning permission for built development differs somewhat from the area which is shown for allocation on the English Heritage plan.
- 5.25 The position of the battlefield is shown on the Proposals Map only by means of a symbol. It is not possible to see where Policy BH15 does and does not apply. For the sake of clarity users should be able to see where policies apply, and the area affected by Policy BH15 should be defined on the Proposals Map. In my view the area should include the whole of the employment allocation on the RDDP except for that part which has been developed, or which has planning permission for the development of buildings, roads and car parks. This is intended to include in the Policy BH15 area the land which bears the legend “Development to be excluded from the hatched area”, on application plan M 1905-101 Revision C.

- 5.26 It follows from what I have said above that I do not agree that Policy BH15 should be reworded to make it easier for development to take place on the battlefield.

Green Belt Allocation

- 5.27 English Heritage argue for the Green Belt designation of most of the objection site which has not been developed.
- 5.28 The land to the north, south and east is Green Belt. The undeveloped part of the site projects as a salient into the Green Belt and is open. It meets some of the purposes of including land in the Green Belt. Kept open, it would check the south-eastward sprawl of the large built-up area of Bradford and its outliers. It would assist in preventing the coalescence of this area with Drighlington and would help in safeguarding the countryside on the site itself from encroachment.
- 5.29 Earlier decisions on whether or not to include the site in the Green Belt have been taken in the absence of any evidence regarding the battle. The Greater Bradford Local Plan Inspector considered there was justification for removal of the site from the Green Belt as it stood then, to allow for the industrial allocation of the land. I conclude above that the majority of that allocation should be deleted, because of the battlefield considerations. The evidence concerning the battle clearly and permanently falsifies the assumption that the land is suitable for employment development. This constitutes an exceptional circumstance for adding the undeveloped land on the site to the Green Belt.
- 5.30 The strongest potential defensible boundary for the Green Belt on the site is the hedge and ditch running in a south-westerly direction from the balancing pond associated with the recent development. This is the boundary suggested by English Heritage, and connects with the small area of Green Belt north of the line of the former railway. It might be possible to reinforce the hedgeline by planting as part of the industrial development, if this can be done consistently with the need to interpret the battlefield, but this is a matter for discussion between the parties involved.

5.31 **Recommendation**

I recommend that the RDDP be modified as follows:

- [a] **BS/E1.11 - delete the present paragraph from the Bradford South constituency volume and replace with:**

“Partly developed site within the Westgate Hill Street Employment Zone.”

Delete the area measurement and replace with a measurement which reflects the boundary recommended below.

- [b] **PROPOSALS MAP**

Delete the eastern and central parts of allocation BS/E1.11, such that the eastern boundary of the allocation follows [I] the line, north of the Inmoor Dyke, dividing the area for the construction of office/industrial and warehouse development from the hatched area, from which development is to be excluded, under the terms of planning permission No. 99/02789/OUT,

and [II] south of the Inmoor Dyke, the line shown on Annex A in Inquiry document 1459/1783/1/WR as “extent of allocation BS/E1.11”.

Delineate the area to be subject to Policy BH15, to include the whole of the BS/E1.11 allocation of the RDDP, except for the land remaining in that allocation as set out in the preceding paragraph of this recommendation.

Redraw the Green Belt boundary to place it within this objection site, following the hedge and ditch running south-west from the balancing pond adjacent to the new A650, as shown on Plan 2 attached to the English Heritage objection dated 27 July 2001.

BS/E1.16: West Bowling Golf Course, Bradford

Objectors

<i>20/1451</i>	<i>Alan E Jagger</i>
<i>1459/1771</i>	<i>English Heritage</i>
<i>3569/8034</i>	<i>Mr Andrew Frost</i>

Summary of Objections

- The site should be retained as an open space for recreational use as it is important to the character and appearance of the area, the setting of the grade II* listed building and the overall regeneration of Bradford.
- There is sufficient land and buildings for employment use in the area, and further development would result in significant worsening of conditions relating to traffic flows, highway safety and air pollution.
- Making this site available for employment use would detract from investment interest within the inner areas where such investment is needed.

Inspector’s Reasoning and Conclusions

- 5.32 The site is laid out as a golf course in an extremely attractive landscape, and has been so used for over 100 years. I do not doubt that it is an important facet in the physical environment of the area and would be greatly missed by many people.
- 5.33 However, apart from the two public rights of way across the land, public access is restricted. Whilst the facilities of the clubhouse can be made available to other users on occasions, the club is not an essential part of the social and community structure of the area. I note that the club has a junior section, but the number of such members is small as a proportion of the total membership. No specific relationships have been developed with local schools, youth or community organisations. Therefore, its local community benefit and importance is limited.
- 5.34 I accept that such a facility is relevant to the social and economic well-being of the wider area, and that other similar facilities may not continue to be available. However, there are other golf courses and clubs in the wider area, and additional facilities could be provided if commercially viable.

- 5.35 In terms of impact on the listed building, I observed that a number of extensions and additions have occurred that are somewhat unfortunate in form and appearance, and detract from the character of the original building. In addition, whilst once no doubt set in an open landscape, the building is now very close to a major road carrying a high volume of traffic. This significantly detracts from the setting of the building, as do the surrounding hard-surfaced car parking areas.
- 5.36 I understand that a planning application has been submitted that includes access arrangements for the land, and these would maroon the listed building on an island site. I have no details of such proposals, and the planning application is not before me for determination. Any development proposals must have due regard to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the advice in PPG15. In terms of the principle of the allocation of the land for employment use I consider that development of such a large site should be capable of respecting the character, appearance and setting of the listed building. Whether the current planning application achieves this is not for me to determine.
- 5.37 Turning now to the availability and need for land for employment use, the overall aspects were discussed at the Employment Land Round Table Session. I note the availability of other sites in the vicinity, but many of these are currently being developed and large sites, such as the objection site, are in short supply over the district as a whole. As stated in the RDDP, and supported by national and regional guidance, the economic regeneration of the district requires the availability of a variety of sites and buildings in order to provide for the needs of new and expanding employment opportunities.
- 5.38 The objection site is large, physically attractive, readily developable and in a highly strategic location in terms of access to the motorway network, other employment areas, residential areas and public transport facilities and services. It lies within the strategic development corridor of the RDDP, the IDP and the 2020 Vision. Indeed, I consider that it is probably the single most strategically important employment site in the whole of the district. These factors, added to the need to increase job opportunities to counteract the high unemployment rates in the area, outweigh the importance of the site as recreational open space. In the Bradford district this site is almost uniquely capable of providing a high quality landscaped setting to attract the prestigious employment opportunities sought by the RDDP and the 2020 Vision.
- 5.39 I accept that there will be an impact on traffic flows on the main highway network in the area. Again, the details of access arrangements are not before me, and Rooley Lane carries a high volume of traffic and must provide a main access to the site. In terms of allocating the land for employment, I have no compelling evidence to show that appropriate access could not be provided, or that it would be unacceptable in terms of the impact on traffic flows, or road safety and air pollution. However, I suggest that the Council and developers investigate opportunities for additional access via the Euroway employment area to the south of the site.
- 5.40 To some degree all employment sites are in competition with one another for available investment opportunities. Hence the recognition in the RDDP of the need to provide a variety of sites in different locations and of different character and subject to different policies, thus seeking to guide investment and development to the more appropriate locations. The objection site is intended to provide opportunities for employment uses that require larger plots with close proximity to the motorway network and a high quality landscape setting (I discuss the site-specific policy objections under reference BS/E11

below). Sites within the inner areas of the district are incapable of meeting these requirements and, provided that the basis of the plan is adhered to, this site should not compete directly with those in the inner areas.

5.41 Accordingly, I am satisfied that the advantages of the objection site in terms of helping to meet the overall economic regeneration objectives of the RDDP are sufficient to outweigh the loss of this long-established area of recreational open space.

Recommendation

5.42 **I recommend that no modification be made to the RDDP.**

BS/E1.22 & SOM/BS/OS1/169: Staithgate Lane (South), Low Moor, Bradford

Objectors

1568/261 & 8411	<i>Mr Michael McTague</i>
1662/268 & 7973	<i>Mrs Gabrielle McTague</i>
2753/4787	<i>Miss Angela Briggs</i>
4185/10354	<i>Ogden Group of Companies</i>

Summary of Objections

- The site is close to areas of nature conservation interest and should be retained as open space rather than allocated for employment use.
- The allocation of the site as a freight transfer facility inhibits its employment development potential, would contribute towards pollution and would be visible from nearby housing.
- The employment allocation should be extended to the land to the north in order to make development of the site more viable.

Inspector's Reasoning and Conclusions

5.43 The nearest Bradford Wildlife Areas are some distance from the site and are separated from it by existing and proposed employment areas together with roads and railways. The areas of acknowledged wildlife interest are themselves close to large industrial and commercial uses and do not appear to be unduly harmed by them. In the same way I do not anticipate that development of the objection site for employment use would result in material harm to any nature conservation interests. As a grassed former landfill site the land is unlikely to have any significant wildlife value in itself, and its importance as a wildlife corridor is reduced by the availability of an expanse of open land to the west.

5.44 The indication that the site is suitable for freight transfer facilities does not require that it be retained for such specific use. Given its location adjacent to rail and motorway connections and close to large employment areas, the site is clearly suitable for such specific use, and I consider it appropriate that the plan should make reference to this. However, as I have already indicated this is not a requirement, and the site would be available for all appropriate employment uses. Therefore, I do not consider that this notation would harm the employment potential of the site.

- 5.45 I have no reason to believe that such specific facilities would necessarily give rise to excessive pollution. In any event, this matter could be controlled by planning and other legislation. Similarly, such development need not be visually intrusive in views from housing in the area. Any development could be landscaped to reduce its visual impact, and in any event the site is separated from the nearest main housing area by the golf course, which is designated as urban greenspace and provides an effective visual buffer.
- 5.46 Concerning the land immediately to the north of this objection site, I have considered its allocation in relation to reference SOM/BS/E1/346 below, where I recommend that the land should be allocated for employment use. This would result in employment allocation of the land west of Staithgate Lane stretching from E1.7 to E1.22 inclusive. The availability of the whole of this area would, in my mind, increase the development potential and commercial viability of employment development, and strengthen the arguments in favour of retaining this site for employment use.

Recommendation

- 5.47 **I recommend that no modification be made to the RDDP, but my recommendation in relation to SOM/BS/E1/169 is relevant.**

BS/E1.23 & BS/TM5.1: Tramways, Cleckheaton Road, Low Moor, Bradford

Objector

4185/10356 & 10392 Ogden Group of Companies

Summary of Objections

- Part of the site to the north of Cleckheaton Road should be allocated for housing instead of employment.
- The employment area to the south of Cleckheaton Road should be extended so that all of the land in the ownership of the objector is allocated for employment.
- The proposed cycleway should be relocated to a more attractive route that would be less disruptive of development proposals.
- There is an inconsistency with the cycle route designation.

Inspector's Reasoning and Conclusions

- 5.48 Whilst supporting the generality of the RDDP proposals for site BS/E1.23, the objections seek changes to the boundaries of the land allocated for employment and designated as employment zones.
- 5.49 The objection site to the north of Cleckheaton Road comprises an area of some 0.43 hectares occupied by a building formerly part of the museum complex together with the site of the former tram tracks and access road. It lies between a small, modern housing development to the south-east and the railway and an area of urban greenspace to the north-west. A cycle route is shown on the Proposals Map parallel to the railway and continuing under Cleckheaton Road to the south-west. The Proposals Map also indicates a new railway station and Park and Ride facilities in the locality, but proposed changes to

the RDDP relocate these to the south of Cleckheaton Road, north of the railway. Planning permission for the erection of 12 dwellings on the site was refused in 2002.

- 5.50 The site lies at the extremity of the employment area stretching southwards from Staithgate Lane, and is cut off from it to a significant degree by a fairly large employment building immediately adjacent to the northern boundary of the suggested housing site. It is close to bus routes and the local services and facilities along Cleckheaton Road and constitutes previously-developed land within the main urban area. Accordingly, it is a sustainable location and ranks high in the locational strategy.
- 5.51 I consider that its relative inaccessibility from the remainder of the employment area significantly reduces its attraction as an employment site. Conversely, its location adjoining a new housing development, from which access might be achieved, makes it appropriate for housing. Accordingly, it is my view that this site should be removed from the employment zone and the allocation changed from employment to housing under Policy H1.
- 5.52 I do not consider that the location of the proposed cycleway would inhibit development of the site for housing, or the land to the north for employment. The precise route could be along the north-western edge of the site where it would provide direct access into the adjoining employment area.
- 5.53 Concerning the land to the south of Cleckheaton Road, the objection seeks to add a narrow strip of land to the east of the existing employment allocation, together with a small area of land that would extend the employment area to the south-east. Again the route of a proposed cycleway is shown to run through these areas.
- 5.54 I consider that the additional areas would marginally increase the land allocated for employment, and may assist in providing a site for a small employment facility together with increased landscaping and circulation space for the existing employment premises. These matters would be useful in this established employment location, which is somewhat cramped in terms of layout. I see no reason why the proposed cycleway could not be accommodated together with the employment allocation, thus providing easy access to the employment area.
- 5.55 Accordingly, it is my view that the extension of the employment use allocation and the employment zone would be reasonable, appropriate and acceptable.

Recommendation

- 5.56 **I recommend that the RDDP be modified as follows:**
- [a] The employment land allocation BS/E1.23 and employment zone BS/E6.2 designation immediately to the north of Cleckheaton Road be deleted and the objection site allocated for housing under Policy H1;**
 - [b] The employment land allocation BS/E1.23 and designation of the employment zone BS/E6.3 to the south of Cleckheaton Road be extended to include the objection site.**

SOM/BS/E1/168: Land at Comondale Way, Euroway, Bradford (BS/OS1.4)

Objectors

4143/8437 *Mr Spragg*
4178/9616 *Leslie Driver*

Summary of Objections

- The land should be allocated for employment use.

Inspector's Reasoning and Conclusions

5.57 The objection site comprises the northern tip of the Toad Holes Beck urban greenspace allocation (BS/OS1.11) and a Bradford Wildlife Area, which adjoins predominantly employment uses. The site lies at the entrance to the Comondale Way employment area.

5.58 In my view only a small section of the site is capable of built development without fairly extensive earthworks as the western section descends quite steeply into the bottom of the valley of the beck. Such works would destroy the mature vegetation on the site, and the character and appearance of the area. At present the site provides a green spur between the adjoining employment development areas. Whilst in need of management and maintenance, the site is of significant visual merit. In addition, although there are no species of wildlife not found elsewhere in the area, I consider that the objection site forms an important part of the designated area, and that the loss of it would significantly reduce its standing.

5.59 I acknowledge the problems of trespass, vandalism and tipping especially around the entrance to the wider area from Comondale Way, but these have been reduced by recent efforts and could, in my view, be reduced further by more positive management and maintenance. I do not consider that such problems merit destruction of a reasonably important wildlife habitat that adds to the character and appearance of the area.

Recommendation

5.60 **I recommend that no modification be made to the RDDP.**

SOM/BS/E1/346: Staithgate Lane, Euroway

Objector

4178/10386 *Leslie Driver*

Summary of Objection

- The urban greenspace designation is inappropriate and the land should be allocated for employment use.

Inspector's Reasoning and Conclusions

- 5.61 The site lies between two areas allocated for employment to the north and south (BS/E1.7 and BS/E1.22) and fronts onto Staithgate Lane, which is a major access road linking residential areas of Bradford to the Euroway employment areas and the M606. To the west the boundary is formed by the line of the railway, beyond which is the South Bradford Golf Course which provides an extensive swathe of open space adjacent to large residential areas.
- 5.62 I consider that this general area has distinct advantages for the location of employment, in contrast to much of the Bradford district. It has excellent connections to the local, regional and national transport networks and is close to residential areas for access by the potential workforce. Whilst the site is not flat it is clearly capable of development and would form a logical extension to the employment allocations to the north and south. Employment development on the site would fit in with the future character and appearance of the area.
- 5.63 The retention of open space is an important consideration, but the locality is reasonably well-provided in this respect, and I have no evidence of any shortage of open space in the general area. The adjacent golf course provides an attractive and extensive open landscape. The objection site is not part of that activity, is separated from it by the line of the railway and is different in appearance, form and character. Part of it is crossed by power lines of various capacities that detract from its character as open space. I do not consider that the objection site forms an important part of the urban greenspace either physically or visually, and its development would not result in a shortage of open space in the area. Maturing landscaping screens views from the M606 across the site, and the site to the north, already allocated for employment (BS/E1.7), is much more visible from the motorway.
- 5.64 Conversely, employment development would be a logical and useful extension of the existing and allocated employment uses, providing, especially in association with BS/E1.7 and BS/E1.22, a large, attractive, well-located site capable of early development. Development in this strategic location would counter-balance the loss of employment land allocations that would result from my recommendations elsewhere.
- 5.65 I conclude that the site is not important to the open space provision of the area and that allocation for employment use would be appropriate and necessary to provide suitable, accessible sites to achieve the employment and economic objectives of national, regional and local policies.
- 5.66 It may be sensible to combine the objection land with BS/E1.7 and BS/E1.22 to form a single site. In such circumstances it may be appropriate to reconsider the specification that BS/E1.7 is restricted to core employment uses, and/or whether the combined site should be subject to Policy E2. In any event the site descriptions would need to be amended.

Recommendation

- 5.67 **I recommend that the RDDP be modified by the deletion of the site from the urban greenspace designation and that it be allocated for employment under Policy E1.**

BS/E6.2: Euroway Estate, Bradford

Objector

4185/11792 *Ogden Group of Companies*

Summary of Objection

- The employment zone boundary should be amended to delete the area of land immediately to the north of Cleckheaton Road (and this land should be allocated for housing).

Inspector's Reasoning and Conclusions

5.68 I have considered this matter in relation to reference BS/E1.23 above, where I conclude that the land should be allocated for housing under Policy H1 and consequently the employment zone boundary should be amended to exclude the objection site.

Recommendation

5.69 **I recommend that the RDDP be modified by the deletion from employment zone BS/E6.2 of the area of land immediately to the north of Cleckheaton Road as identified in my recommendation on BS/E1.23 (land to be allocated for housing under Policy H1).**

BS/E6.3: Low Moor, Bradford

Objector

4185/10389 *Ogden Group of Companies*

Summary of Objection

- The boundary of the employment zone should be amended to include all the land owned by the objector.

Inspector's Reasoning and Conclusions

5.70 I have considered this matter in relation to BS/E1.23 above, where I conclude that the objection site should be allocated for employment and included within employment zone BS/E6.3.

Recommendation

5.71 **I recommend that the RDDP be modified by the alteration of the boundary of employment zone BS/E6.3 to include the land south of Cleckheaton Road as identified in relation to my recommendation on BS/E1.23.**

POLICY BS/E11: West Bowling Golf Course

Objectors

954/4094	<i>Government Office for Yorkshire and the Humber</i>
3868/6602	<i>Mr F Scott</i>
4189/3835	<i>Parkside Securities Ltd</i>
954/12298	<i>Government Office for Yorkshire and the Humber</i>
4117/12695	<i>Alfred McAlpine Special Projects</i>
4119/12699	<i>Lattice Property Holdings Ltd</i>
4189/12684	<i>Parkside Securities Ltd</i>
5021/12693	<i>Miller Developments (Northern) Ltd</i>

Summary of Objections

- The reference to the provision of A1 retail use and hotel development of the site should be deleted as contrary to national policy guidance, and the land should be restricted to manufacturing industry only.
- Conversely, the costs involved in developing the site are such that greater flexibility in terms of acceptable uses should be permitted to allow class A1 non-food retail, A3 food and drink and D2 leisure uses.
- The requirement to provide 2 sites of 5 hectares each is too restrictive.
- References to taking account of the Council's transport proposals for the area and the preparation of a development brief are inappropriate and unnecessary in view of the advanced stage of the development proposals.

Inspector's Reasoning and Conclusions

- 5.72 I understand that planning applications relating, amongst other things, to retail development on the site have been submitted but not yet determined, and indeed have been called-in by the ODPM. Such applications are not before me and my role relates to the duly made objections to the RDDP.
- 5.73 I note the concerns expressed about the potential costs involved in bringing this land forward to development for employment purposes. The Council has sought to make allowance for this by permitting class A1 non-food retail (heavy raw materials) and C1 (hotel), where it can be demonstrated that such uses are necessary to secure the implementation of the overall development.
- 5.74 However, such provision is in conflict with national policy guidance in PPG6, PPG13 and PPG21 and indeed with strategic policies in the RDDP itself. The proposed exceptions fail, amongst other things, to follow the sequential tests set out for such developments. Significant retail or hotel development in this location would be totally contrary to national guidance and the policy, as written, is unacceptable.
- 5.75 Furthermore, the site is probably the most strategically located and attractive employment allocation in the whole of the District. I consider that it would prove to be a sought-after location for prestige employment opportunities seeking a high quality environment, and therefore should be protected from less desirable developments.

- 5.76 I have no compelling evidence to demonstrate that the costs of bringing the site on-stream would be so great as to justify a policy that is so contrary to national guidance. In any event, given the stated local and regional importance of the site for employment development, it may well be that financial contributions towards the development costs would be available from regional resources.
- 5.77 I note that the RDDP does not propose that the site would be restricted to core employment activities, and therefore some ancillary retail, leisure and tourism uses may be acceptable. Even so, such uses, dependent upon their scale, would be subject to the sequential tests set out in national guidance, and would be considered in relation to the development plan and all material considerations when proposals were submitted. I consider that restriction to manufacturing industry, or even core employment uses, would be unnecessarily restrictive and could count against uses that would be beneficial to the economic regeneration of the whole area.
- 5.78 Concerning the requirement to make provision for 2 sites of 5 hectares each for single-user developments, I have discussed this in general terms in relation to Policy E2 in the Policy Framework volume of this report. I consider that it is important to ensure that sites for single-user developments are preserved, subject to them not taking up an excessive proportion of the total site area. The total area of site E11 is stated to be some 35 hectares. The proposed single-user sites would therefore occupy less than 30% of this total, well within the limit I recommend in relation to Policy E2. I am satisfied that this is a reasonable allowance to be made at this stage. On-going monitoring of plan performance can, if appropriate, lead to amendment of this requirement, but I consider that currently it is a sensible and necessary provision.
- 5.79 Reference to taking account of the Council's transport proposals in the area is not necessary as development proposals must have regard to such matters if they are to achieve planning permission. Whilst it may be desirable to make potential developers aware of any special considerations it is not appropriate to include this within the policy. If necessary it could be included within the supporting text, in which case an indication of the highway proposals would be helpful, especially if these are not included in the RDDP.
- 5.80 In relation to the need for a development brief, I have already noted that applications for planning permission have been submitted. These might seem to negate the need for the preparation of such a brief but, in the light of my conclusions in relation to such matters as the provision of significant retail floorspace, I consider that provision for the preparation of a development brief is sensible.

Recommendation

- 5.81 **I recommend that the RDDP be modified by the deletion of the West Bowling Golf Course supporting text and Policy E11 and its replacement as follows:**

[a] West Bowling Golf Course

West Bowling Golf Course has been identified as a strategic site of regional significance for inward investment. It is currently in use as an operational golf course and is affected by past mining and landfill activity, geological faults and significant topographical constraints that will influence the pattern of development, as will the presence of a grade II* listed building on

the northern boundary of the site. Appropriate means of access and off-site highway improvement works will be required, taking account of the Council's transport proposals for the area.

Nevertheless, the site comprises some 35 hectares of very attractive landscape in a highly strategic location alongside the M606 and the Bradford Ring Road, with frequent public transport services. It is also located between two existing important employment areas at the Euroway Estate and the Eurocam Business Park, and opposite the Yorkshire Building Society Headquarters building. It is close to extensive residential areas that provide a ready source of potential employees.

Proposals for the site will be guided by a development brief and the Council will seek a planning agreement including, amongst other things, phasing, access, highways, public transport provision and off-site works. Policy BS/E11 applies in addition to E1 and E6. The site will not be restricted to core employment activities and ancillary uses will be permitted, subject to compliance with other policies of the plan. As larger, strategically located sites are few in the district, Policy E2 applies. On this site not less than 2 sites of at least 5 hectares each will be allocated for single-user developments.

[b] POLICY BS/E11 WEST BOWLING GOLF COURSE

DEVELOPMENT WILL MAKE PROVISION FOR THE ALLOCATION OF NOT LESS THAN 2 SITES OF AT LEAST 5 HECTARES EACH FOR SINGLE-USER BUSINESS OR INDUSTRIAL REQUIREMENTS TO MEET THE NEEDS OF LOCAL COMPANIES AND INWARD INVESTMENT FOR LARGE SITES IN THE DISTRICT (EXCEPT FOR DISTRIBUTION AND LOGISTICS COMPANIES SUBJECT TO POLICY E7).

Chapter 6: Housing

PARAGRAPH 6.0

Objector

954/12858

Government Office for Yorkshire and the Humber

Summary of Objection

- It is difficult to understand how much greenfield land is being allocated because the constituency volumes do not contain this information for each site.

Inspector's Reasoning and Conclusions

- 6.1 In view of the importance of this information the site specific data in the constituency volumes should state whether each housing site is greenfield land or previously-developed land.

Recommendation

- 6.2 **I recommend the modification of the RDDP by the inclusion of information, for each housing site listed in the Bradford South constituency volume, as to whether the site is a greenfield site or previously-developed land.**

BS/H1.5: Brafferton Arbor, Buttershaw, Bradford

Objector

4010/8006

Eileen Allen

Summary of Objection

- The Plan should provide for the housing needs of the people of Buttershaw, particularly through the retention of 4-bedroomed Council houses.

Inspector's Reasoning and Conclusions

- 6.3 This site is part of a larger housing clearance area, which has been granted planning permission for redevelopment. However, this site is less than 0.4 hectares in area, the threshold adopted for allocating sites, and has been deleted from the RDDP. I do not therefore conclude upon it.

Recommendation

- 6.4 **I recommend that no modification be made to the RDDP.**

BS/H1.6 & SOM/BS/OS2/293: Bellerby Brow, Buttershaw, Bradford

Objectors

4010/5577 *Eileen Allen*
4011/7426 & 10353 *Mr Giles Morgan*

Summary of Objections

- Public buildings and land should not be sold to private companies.
- The site should be retained as a green area, and developed for recreation.

Inspector's Reasoning and Conclusions

- 6.5 This site is rough grassland with no formal use, and there is no evidence of significant wildlife value. It is well located for schools, local shops, open spaces and bus services, and the local highway network has adequate capacity to cater for the additional traffic generated.
- 6.6 It is clear from the Council's Core Proof: Meeting the Housing Requirement (CD3) that not all housing can be accommodated on previously-developed sites, and both previously-developed land and undeveloped land within the urban area are listed as the first location in the sequence of sites as set out in the location strategy.
- 6.7 The form of tenure is not a matter for the RDDP but the Council points out that, given the location of the site, it may be of more interest to a social housing landlord than a private developer. Also, Policy H9 of the RDDP makes provision for affordable housing on substantial residential developments.

Recommendation

- 6.8 **I recommend that no modification be made to the RDDP.**

BS/H1.8: Westwood Hospital, Clayton Heights, Bradford

Objector

4009/5575 *Ms Angela Allen*

Summary of Objection

- This large-scale destruction of the countryside cannot be justified.

Inspector's Reasoning and Conclusions

- 6.9 I understand that this site was not open countryside but the site of a former hospital. Planning permission was originally granted for residential development in 1996, and development is nearing completion. It would therefore be inappropriate to delete the allocation. Areas of woodland have been retained as part of the development, and are identified as open space.

Recommendation

6.10 **I recommend that no modification be made to the RDDP.**

BS/H1.9 & SOM/BS/GB1/160: Calder Banks, Queensbury, Bradford

Objectors

936/608	<i>Mrs Barbara O'Connor</i>
981/611 & 11313	<i>Mrs Mary Hargrave</i>
1243/609	<i>Mr Geoffrey Green</i>
1632/610	<i>Mr John Hinchcliffe</i>
1806/273 & 7978	<i>Miss Deborah Russell</i>
2000/6 & 10331	<i>Mr Peter Nash</i>
2464/8553	<i>Accommodate UK Ltd</i>
2625/11095/96	<i>Mr Albert Jones</i>
2979/10335/6	<i>Mr & Mrs T Emmott</i>
3021/6896	<i>Mr Richard Smiley</i>
3023/6897	<i>Mrs Anne Halligan</i>
3411/5053	<i>Mrs Meriel Harrison</i>
4491/10398	<i>Mrs W Hughes</i>

Summary of Objections

- Development will result in loss of light and outlook, increased traffic levels and hazards, and loss of trees.
- The land should be designated as Green Belt.
- Sites of more substantial scale should be identified to ensure the needs of Queensbury are met.

Inspector's Reasoning and Conclusions

6.11 There is insufficient previously-developed land to meet the housing requirement, and hence a need to allocate greenfield land. The Council advises that this site was granted planning permission for the construction of 16 houses on 24 October 2002, and it would therefore be inappropriate to delete the allocation.

Recommendation

6.12 **I recommend that no modification be made to the RDDP.**

BS/H1.12: Hopefield Way, Rooley Lane, Bierley, Bradford

Objector

4189/6608	<i>Parkside Securities Ltd</i>
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Summary of Objection

- The text should be amended to delete reference to the need for peripheral landscaping, access and footpath requirements.

Inspector's Reasoning and Conclusions

6.13 Although this site relates to the new housing development to the east, it will adjoin a large employment site and I consider that it is reasonable to require landscaping along the boundary.

Recommendation

6.14 **I recommend that no modification be made to the RDDP.**

BS/H1.17 & SOM/BS/OS2/294: Wibsey Park Avenue, Wibsey, Bradford

Objector

4007/7781 & 10352 *Veronica Rose*

Summary of Objections

- The land should be left for recreation use.

Inspector's Reasoning and Conclusions

6.15 This is greenfield land, and the Council agrees it is used for informal recreation purposes. Although Wibsey Park is only a short distance away, there is a deficiency of open space locally. The objection land is well overlooked, and suitable for ball games. In the absence of an assessment along the lines recommended in PPG17 I do not support allocation for housing, even though the land is well located for buses, schools and local shops. Under the circumstances a recreation open space designation is appropriate.

Recommendation

6.16 **I recommend that the RDDP be modified by the deletion of the housing allocation from this site, and its replacement by notation under Policy OS2.**

BS/H1.18: Beacon Place, Buttershaw, Bradford

Objector

4008/5574 *Rose Allen*

Summary of Objection

- The land should be retained for recreation and wildlife.

Inspector's Reasoning and Conclusions

6.17 This site was allocated as a housing site in the adopted UDP, and the majority of the site has planning permission for housing, which is currently under construction. There is an area of land to the rear of properties in Beacon Place and Buttershaw Drive not covered

by the planning permission. This is narrow and steeply sloping, with some small trees, long grass and other vegetation. I do not doubt that it provides both a wildlife habitat, and an area for local children to play, but I do not consider that it has sufficient recreational or wildlife value to justify its protection. In these circumstances, I consider that the allocation should be retained in its entirety, although this part of the site appears to have very limited development potential.

Recommendation

6.18 I recommend that no modification be made to the RDDP.

BS/H1.20, SOM/BS/GB1/260 & SOM/BS/NE9/260: Fenwick Drive, Woodside, Bradford

Objectors

469/613	<i>Mr & Mrs Kent</i>
864/214 & 10830	<i>Mr N Barker</i>
2492/5563	<i>Mr Barrie Sharp</i>
2494/7999	<i>Mrs A M C Sharp</i>
2552/8561	<i>Mr Wilfred Jones</i>
2780/8567	<i>Mrs K M Brown</i>
3118/10342 & 10339	<i>Ms J Pratt</i>
3339/5052	<i>Miss Dorothy P Ellis</i>
3903/5572	<i>Mr George Bastow</i>
4131/9663 & 9660	<i>Sir Ernest Hall</i>
4544/9625 & 9622	<i>Bradford No.1 Angling Club</i>

Summary of Objections

- The allocation should be deleted, and preference given to brownfield sites.
- There are poor services and insufficient schools.
- There is enough housing in the area, and further development will increase competition for jobs.
- Development would detract from Judy Woods, and from the setting of Royds Hall, which is a listed building.
- Local roads are unsuitable to cope with increased traffic.
- It will limit access to Royds Hall Dam, a popular venue for anglers.
- Possible leukaemia risk from power lines.
- The land should return to common land/Green Belt/agriculture/nature reserve.

Inspector's Reasoning and Conclusions

6.19 There is insufficient previously-developed land to meet the housing requirement, and hence a need to allocate greenfield land. The Council advises that outline planning permission for housing was granted in February 2002, and it would therefore be inappropriate to delete the allocation.

6.20 This land currently forms part of an area of open land extending to the south, the remainder of which is within the Green Belt. Whilst I can appreciate that local residents would like to see the land remain open, I do not consider that there are any exceptional circumstances for altering the Green Belt boundary to include this land. Also, there is no

evidence to suggest that the land has significant nature conservation value. The site is reasonably well located for local facilities, with a primary school and bus route adjoining the site, and some employment nearby, and hence is a sustainable location for housing.

- 6.21 In relation to the detailed points raised by objectors, Royds Hall is a short distance to the south, and will need to be taken into account in the detailed design of the development, as will access to Royds Hall Dam, but I see no reason why this should unduly restrict the development potential of the site. Government guidance on the potential health risks from overhead power lines indicates that there is no convincing evidence of a link, but this is a further matter to be taken into consideration at the detailed planning stage.

Recommendation

- 6.22 **I recommend that no modification be made to the RDDP.**

BS/H1.22 & SOM/BS/NE9/376: Common Road, Abb Scott Lane, Low Moor, Bradford

Objectors

469/612	<i>Mr & Mrs Kent</i>
2492/5556 & 11130	<i>Mr Barrie Sharp</i>
2494/8000 & 11131	<i>Mrs A M C Sharp</i>
2543/5554 & 11800	<i>Mr Albert Raper</i>
2552/6889	<i>Mr Wilfred Jones</i>
2780/8565	<i>Mrs K M Brown</i>
3118/10343	<i>Ms J Pratt</i>
3125/7995	<i>Mrs B Marsland</i>
3339/5049	<i>Miss Dorothy P Ellis</i>
3903/5570 & 11129	<i>Mr George Bastow</i>

Summary of Objections

- There are poor services, and inadequate road infrastructure.
- There would be a loss of wildlife habitat, and the land should be used for recreation or a nature reserve.

Inspector's Reasoning and Conclusions

- 6.23 This is a previously-developed site within the urban area, and hence the first location in the sequence of sites as set out in the location strategy. It is well located for schools, local shops, open spaces and bus services, and the local highway network has adequate capacity to cater for the additional traffic generated. The Council acknowledges that one of the local primary schools is oversubscribed, but there are other schools nearby which have capacity.
- 6.24 There is a Tree Preservation Order covering a number of individual trees, and groups of trees, on the site, and the RDDP requires that the pond, trees and stream be retained and incorporated as part of the development of the site. Whilst parts of the site clearly have significant nature conservation value, and there are important features that should be preserved, much of the remainder has no particular wildlife interest, and I do not consider that the site as a whole is of sufficient value to preclude any development.

Recommendation

6.25 I recommend that no modification be made to the RDDP.

BS/H1.23, SOM/BS/GB1/261 & SOM/BS/NE9/261: Summer Hall Ing, Delf Hill, Bradford

Objectors

469/606	<i>Mr & Mrs Kent</i>
864/218 & 10832	<i>Mr N Barker</i>
1207/607	<i>Mr & Mrs G S & J L Bennett</i>
2492/5555	<i>Mr Barrie Sharp</i>
2494/8003	<i>Mrs A M C Sharp</i>
2552/8563	<i>Mr Wilfred Jones</i>
2780/8564	<i>Mrs K M Brown</i>
3118/10340/1	<i>Ms J Pratt</i>
3125/7994	<i>Mrs B Marsland</i>
3339/5050	<i>Miss Dorothy P Ellis</i>
4010/5576	<i>Eileen Allen</i>
4544/9627 & 9632	<i>Bradford No.1 Angling Club</i>

Summary of Objections

- The allocation should be deleted, and preference given to brownfield sites.
- There are poor services and insufficient schools.
- There is enough housing in the area, and further development will increase competition for jobs.
- Development would detract from Judy Woods, and from the setting of Royds Hall, which is a listed building.
- Local roads are unsuitable to cope with increased traffic.
- It will limit access to Royds Hall Dam, a popular venue for anglers.
- Possible leukaemia risk from power lines.
- The land should return to common land/Green Belt/agriculture/nature reserve.

Inspector's Reasoning and Conclusions

6.26 It is clear from the Council's Core Proof: Meeting the Housing Requirement (CD3) that not all housing can be accommodated within the urban area, and this site is well located for schools, local shops, open spaces and bus services. The local highway network has adequate capacity to cater for the additional traffic generated. In addition, the Council advises that the site has been granted planning permission for housing, and it would therefore be inappropriate to delete the allocation.

6.27 The RDDP requires that development be well set back from the northern boundary, and the northern and western boundaries strengthened by woodland planting. This will reduce the impact on adjoining land within the Green Belt but I do not consider that there are any exceptional circumstances for altering the Green Belt boundary to include this land.

6.28 Also, the Council advises that this site has not been identified as being of nature conservation value at present, and I accept that there is no compelling evidence to support

allocation as a nature reserve. Government guidance on the potential health risks from overhead power lines indicates that there is no convincing evidence of a link, but this is a further matter to be taken into consideration at the detailed planning stage.

Recommendation

6.29 **I recommend that no modification be made to the RDDP.**

BS/H1.24: Summer Hall Ing, Delf Hill, Bradford

Objector

4010/6893 *Eileen Allen*

Summary of Objection

- Public housing should not be destroyed for private profit.

Inspector's Reasoning and Conclusions

6.30 This site has been deleted as the existing properties have now been improved, rather than cleared and replaced by new development as originally proposed. The objector has indicated that these changes are acceptable and, since the proposal has been deleted from the RDDP, I do not conclude upon it.

Recommendation

6.31 **I recommend that no modification be made to the RDDP.**

BS/H1.36 (formerly BS/H2.6): Holme Lane, Holmewood, Bradford

Objectors

1725/1791 *Joint Owners of Land at Holme Lane, Bradford*
4144/8132 *Northcountry Homes Group Limited*

Summary of Objections

- The site should be shown as a committed housing site, not an allocation.
- This should not be allocated in preference to other suitable brownfield sites.

Inspector's Reasoning and Conclusions

6.32 This site was shown in the FDDP as a phase 2 housing site, but has now been allocated as a phase 1 site in recognition of the fact that it has an extant outline planning permission.

6.33 There are insufficient previously-developed brownfield sites to meet the housing requirement, and it is therefore necessary to include a number of greenfield sites as housing allocations. I do not consider that there is any justification for deleting this site on the basis of the availability of other suitable sites.

Recommendation

6.34 **I recommend that no modification be made to the RDDP.**

BS/H1.41 (formerly SOM/BS/H1/147): Northern View Hospital, Rooley Avenue, Odsal

Objectors

4320/8433 *NHS Estates*
5041/13031 *Bradford Bulls Holdings Limited*

Summary of Objections

- This site should be allocated for housing if the comprehensive redevelopment of Odsal Stadium does not proceed.
- Housing on this site would be prejudicial not only to the redevelopment of the stadium area but also to its continued use.

Inspector's Reasoning and Conclusions

- 6.35 The Council proposes a change to delete the Odsal Stadium Action Area and to allocate this land as a phase 1 housing site, BS/H1.41. I have considered the deletion of the Action Area earlier in this report, and recommended that the RDDP be modified in this respect.
- 6.36 The allocation of the former hospital site for housing would satisfy the objection by NHS Estates, but has given rise to the objection by Bradford Bulls Holdings Limited. This objector points out that the present use of the stadium involves pre-match entertainment with music and fireworks, as well as the normal noise and activity associated with a sporting fixture. The proposed housing site is at a higher level than the stadium, but it seems likely that it would be subject to significant noise levels, and is not therefore an ideal site for housing. However, it is a previously-developed site within the main urban area, albeit showing few signs of the previous buildings, and it is a sustainable location for new housing. In my view, the problems associated with the stadium use are not so great as to prevent the site being developed for housing, and future occupiers would be aware of the stadium and activity there.

Recommendation

6.37 **I recommend that the RDDP be modified by the inclusion of Northern View Hospital as housing site BS/H1.41, as proposed on page 48 of the Council's proposed changes, dated January 2003.**

SOM/BS/H1/7 & SOM/BS/GB1/7: Land at Spen View Lane, Bierley, Bradford

Objectors

1730/11157 & 4095 *Mr J Driver*
4303/11158 & 4096 *Mr Woodhead*

Summary of Objections

- This land should be removed from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

- 6.38 In considering objections to the overall provision of housing land, and the extent of the Green Belt, I have concluded that there is insufficient land allocated for housing, and safeguarded for longer-term development. There are limited opportunities within the urban areas, and it will therefore be necessary to remove land from the Green Belt to accommodate the shortfall. The site would represent an extension to the urban area of Bradford, and thus a suitable location for housing provision after sites within the urban areas.
- 6.39 This site is roughly triangular in shape, bounded on two sides by existing development and on the other by the line of a disused railway. It is therefore well contained, and well related to the urban area. There are two primary schools within one kilometre, and buses within walking distance, but other local facilities are scattered. I do not therefore consider that the site is sufficiently sustainable to be suitable for development within the current plan period. However, there is likely to be a need for further housing in future, and I consider that this is an exceptional circumstance to justify removing land from the Green Belt. The disused railway forms a well-defined boundary, and the removal of this part of the Green Belt would have little effect on the function of the remainder of the Green Belt.

Recommendation

- 6.40 **I recommend that the RDDP be modified by the removal of land at Spen View Lane, Bierley from the Green Belt and that it be designated as safeguarded land under the terms of Policy UR5.**

SOM/BS/H1/129 & SOM/BS/GB1/129: Land at Holme Lane, Holmewood, Bradford

Objector

4216/8559 & 11159 *Mr M Wilan*

Summary of Objections

- This land should be removed from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

- 6.41 This land adjoins housing development to the south, and there is further development on the opposite side of Holme Lane. However, apart from some stable blocks, this is open countryside. Whilst there may be a need to remove land from the Green Belt to provide for development needs either during or beyond the plan period, this land serves a number of the purposes of including land within the Green Belt, and I do not consider that it would be appropriate to further erode this part of the Green Belt separating Bradford from Leeds. In my view, there are no exceptional circumstances, and therefore no justification for removing it from the Green Belt.

Recommendation

6.42 **I recommend that no modification be made to the RDDP.**

SOM/BS/H1/146: Deanstone Lane, Queensbury

Objector

2503/10385 *Mr Nix*

Summary of Objection

- The site should be allocated as a phase 1 housing site.

Inspector's Reasoning and Conclusions

6.43 This is an employment site within the built-up area of Queensbury. It is an irregular shape and adjoined by housing, and by another employment site at a lower level. There is a school on the opposite side of Deanstone Lane, but it is some 600 metres from the centre of Queensbury, and over 400 metres from a bus route. Whilst it would be a reasonably sustainable location for housing, the present employment use helps to make Queensbury a more sustainable settlement, and the redevelopment of this site would result in the remaining employment use being completely surrounded by housing, which I consider would be undesirable. I therefore accept the Council's view that the existing employment should be safeguarded, and that Policy E3 should apply. This would allow for other uses if the employment use was no longer appropriate because of the adverse effect on surrounding land uses, or the building became functionally redundant for employment use.

Recommendation

6.44 **I recommend that no modification be made to the RDDP.**

SOM/BS/H1/149 & BS/E1.9: Black Dyke Mills, Queensbury

Objector

194/496 & 8419 *P J Wade Ltd*

Summary of Objections

- The allocation should be revised from employment to residential.

Inspector's Reasoning and Conclusions

6.45 In considering objections to the overall provision of housing land, I have concluded that there is insufficient land allocated for housing.

- 6.46 This land is part of employment allocation BS/E1.9, which comprises open land adjoining Black Dyke Mills, and is an allocation that has been carried forward from the adopted UDP. Some 1.8 hectares of employment land would remain available for new development, together with extensive floorspace in the existing buildings, more than half of which is currently vacant. Whilst I appreciate the Council's wish to retain sufficient employment for local needs, I am doubtful that all of this land will be required for employment purposes, particularly taking into account the lack of interest that has been shown since it was originally allocated.
- 6.47 I understand that part of the site was previously developed, but there is little evidence of the former structures. However, it is within the urban area of Queensbury, close to local facilities and bus routes giving access to larger settlements, and is a sustainable location for new housing, in accordance with the locational strategy of the RDDP. I see no objection in principle why it should not be so allocated, and early development of part of the site for housing could lead to the development of the employment land at the same time.
- 6.48 The Council suggests that the access is unsatisfactory, but I note that improvements have been approved in association with a retail development on the opposite side of Brighthouse Road. I assume that the Council considers that this would provide an acceptable access for the development of the site for employment purposes, and can see no reason why it should be unacceptable for housing. Housing would produce a different pattern of traffic movements, and there is limited spare capacity on the local road network. However, if the site is to be developed, I doubt that the impact would be significantly different whether it was used for employment or housing. Within the site, the access road would be between existing buildings, and there would clearly be a need for some demolition to provide curves of an acceptable radius, and to create an attractive entrance to both the new housing and employment areas. Without this the site could not be developed, but there would appear to be sufficient space within the site to construct an access road.

Recommendation

- 6.49 **I recommend that the RDDP be modified by the deletion of allocation BS/E1.9 (land at Black Dyke Mills, Queensbury) and the allocation of the land for housing under the terms of Policy H1.**

SOM/BS/H1/150 & SOM/BS/GB1/150: Land at Old Guy Road, Queensbury

Objector

4202/7794/5 *Alfred McAlpine Developments*

Summary of Objections

- This land should be removed from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

- 6.50 This site is part of the objection site listed as SOM/BS/GB1/338, which I consider later in this section of the report, and conclude that the land should not be allocated for housing but should remain in the Green Belt.

Recommendation

6.51 I recommend that no modification be made to the RDDP.

SOM/BS/H1/152 & SOM/BS/GB1/152: Land at Cross Lane, Queensbury

Objector

2506/7807 & 8420 *Mr A Webster*

Summary of Objections

- This land should be removed from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

6.52 This is a rectangular plot of land bounded by roads on three sides and by garden fences on the other side. Whilst the site is presently open, and hence makes a contribution to the purposes of including land within the Green Belt, it relates more to the built-up area than to the wider open countryside beyond. The stone wall adjoining the highway boundaries appears as a more well-defined and defensible boundary to the Green Belt than the present boundary.

6.53 There is a need to provide for housing in sustainable locations, in accordance with national and local strategy, and this could make a small contribution towards meeting the housing requirement for Bradford. It is on the western edge of Queensbury, and hence some distance from local facilities and public transport. I do not therefore consider that it should be allocated for development in phase 1, but it is a reasonably sustainable location and could be allocated for development in phase 2.

6.54 Development here would round-off the settlement, and provide a long-term boundary to the Green Belt. In my view these, together with the overall need for housing, are exceptional circumstances which justify removal of the site from the Green Belt.

Recommendation

6.55 I recommend that the RDDP be modified by the removal of land at Cross Lane, Queensbury from the Green Belt and that it be allocated for housing under the terms of Policy H2.

SOM/BS/H1/165.01 & SOM/BS/GB1/165: Land at Brighouse Road, Park Lane, Queensbury

Objector

2464/10332/3 *Accommodate UK Ltd*

Summary of Objections

- This land should be removed from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

- 6.56 In considering objections to the overall provision of housing land, and the extent of the Green Belt, I have concluded that there is insufficient land allocated for housing, and safeguarded for longer-term development. There are limited opportunities within the urban areas, and it will therefore be necessary to remove land from the Green Belt to accommodate the shortfall. Queensbury is defined as an urban area, and this site would be an urban extension. In principle, such sites are needed to provide a sufficient housing supply.
- 6.57 This site is just over 400m from the junction of Brighouse Road and the A647, which forms the focus for local facilities and bus routes. Whilst this slightly exceeds the distance to local centres used by the Council, the site is still well located in relation to the centre of Queensbury. The land is adjoined to the north and west by roads, with housing beyond, and has high stone walls along these boundaries. A field boundary marks the eastern edge of the site, and there is a further field beyond this, which the objector has requested be removed from the Green Belt and safeguarded for longer-term development. The boundary to this further field is well defined by a row of mature trees. To the south the land is open, and the boundary undefined, although the golf course is only a short distance to the south, and the car park extends towards the objection site.
- 6.58 Whilst this site currently serves a Green Belt function, it is well located in relation to the urban area, and contained by existing development and landscape features. Its removal would have little effect on the function of the remainder of the Green Belt, and I consider that there are exceptional circumstances for removing it from the Green Belt.
- 6.59 The Council advises that there is limited spare capacity on the local highway network, and there could be difficulties in providing access to the site. I do not consider that this would prevent the site from being developed but, because of this, and the fact that it is an urban extension and not a site within the urban area, I consider that it should be included as a phase 2 allocation.

Recommendation

- 6.60 **I recommend that the RDDP be modified by the removal of land at Brighouse Lane, Queensbury from the Green Belt and that the land be allocated for housing under the terms of Policy H2.**

**SOM/BS/H1/267, SOM/BS/H2/267, SOM/BS/UR5/267, SOM/BS/GB1/267,
SOM/BS/H1/281, SOM/BS/H2/281, SOM/BS/UR5/281, SOM/BS/GB1/281,
SOM/BS/H1/292, SOM/BS/H2/292, SOM/BS/UR5/292 & SOM/BS/GB1/292: land at Julian
Drive & Lingfield Terrace, Clayton Heights, Bradford**

Objector

4317/10395, 10812 & 10783

Mr E Upite

Summary of Objections

- The land should be removed from the Green Belt and allocated for housing or safeguarded land.

Inspector's Reasoning and Conclusions

6.61 These sites satisfy a number of the purposes of including land within the Green Belt. They are located on the edge of the main urban area, where the Green Belt will need to be loosened to provide additional sustainable housing and safeguarded land. They occupy high land, but would be seen in views from the north against the prominent backdrop of existing development at Clayton Heights. However, Clayton Heights has only limited services, and housing development would in my opinion be relatively unsustainable. Therefore I conclude that the land should not be allocated for housing, or for safeguarding. As the sites fulfil Green Belt functions, they should remain in the Green Belt.

Recommendation

6.62 **I recommend that no modification be made to the RDDP.**

SOM/BS/H1/295, BS/E1.10 & SOM/BS/GB1/295: Albert Road, Queensbury, Bradford

Objector

4306/7789 & 8894/5 *Triplex Ltd*

Summary of Objections

- The land should be allocated for housing.

Inspector's Reasoning and Conclusions

6.63 The objection site comprises a vehicle breakers' yard, and an area of open land within the Green Belt. The breakers' yard was shown as an employment allocation in the FDDP, but that has now been deleted, and alternative development would be considered under Policy E3. This would allow for development for other uses of the site if it was no longer appropriate to continue as an employment use because of the adverse effect on the surrounding land uses. The Council accepts that the present use is not wholly appropriate but believes that there are more appropriate employment uses that could be considered here. Whilst the redevelopment of the site could reduce the adverse effects, this is not an ideal location for employment use, being on the edge of the urban area. The site is, however, well located for housing, being close to a school and within easy reach of local shops and services in the centre of Queensbury, and I consider that this part of the site should be allocated for housing.

6.64 The Green Belt land is clearly separate from the vehicle breakers, and part of the open countryside, with the school and public house opposite appearing as isolated buildings outside of the settlement. The land currently serves a number of the purposes of including land in the Green Belt and, in my view, development of this part of the site would be an

unacceptable intrusion into the countryside, reducing the separation between Queensbury and Mountain. The objector suggests that development of this land could incorporate a car park for the school, and I noted that there was some congestion when children were being collected. However, I doubt that the provision of a car park would significantly improve the situation, and I do not consider that this is an exceptional circumstance to justify removing land from the Green Belt.

Recommendation

6.65 I recommend that the RDDP be modified by the allocation of employment land at Albert Road, Queensbury for housing under the terms of Policy H1.

SOM/BS/H1/338.01 & SOM/BS/GB1/338: Fleet Lane, Queensbury

Objectors

4587/10588/9	<i>Mrs B Cook</i>
4588/10590/91	<i>Mr B Keegan</i>
4601/10592/3	<i>Mr T Bradley</i>

Summary of Objections

- The land should be removed from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

6.66 The objection site lies to the north-west of Queensbury, between the urban area and the separate settlement of Mountain. It would be an extension to an urban area, and such extensions are in principle required to make up the housing supply.

6.67 However, whilst Queensbury has a reasonable range of local services, this site is not within convenient walking distance of the shops or the main bus routes. It would not therefore be a sustainable location for new residential development.

6.68 In addition, this is a significant area of open countryside, which I consider should be safeguarded from encroachment in order to prevent the spread of the urban area of Queensbury, and to retain the physical separation between Queensbury and the small settlement of Mountain, which has its own separate identity. The land is therefore appropriately included in the Green Belt, and there are no exceptional circumstances to justify its removal.

Recommendation

6.69 I recommend that no modification be made to the RDDP.

SOM/BS/H1/368: Tramways, Cleckheaton Road, Low Moor

Objector

4185/10585	<i>Ogden Group of Companies</i>
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Summary of Objection

- The employment allocation and employment zone designation should be deleted and the site allocated for housing under Policy H1.

Inspector's Reasoning and Conclusions

6.70 I have considered this matter in relation to BS/E1.23 above, where I conclude that the land should be allocated for housing under Policy H1.

Recommendation

6.71 **I recommend that the RDDP be modified by the deletion of the employment land allocation and the employment zone designation and that the site be allocated for housing under Policy H1.**

SOM/BS/H1/389 & BS/OS1.9: Wilson Road, Wyke, Bradford

Objector

3178/10344 & 10346 H Birkby & Sons Ltd

Summary of Objections

- The urban greenspace designation should be removed, and part of the site allocated for housing.

Inspector's Reasoning and Conclusions

6.72 This land is part of a larger area of land allocated as urban greenspace, which lies mainly between the Green Belt to the south and a major employment area to the north, and adjoins the safeguarded land allocation BS/UR5.3 to the west. I have considered an objection to this allocation earlier in the report, and conclude that it would be inappropriate to allocate the land for housing at the present time, or to safeguard it for future housing development, since it falls within the inner hazardous safety zone for two chemical works. Similar considerations apply to this land.

6.73 Also, although there is residential development along most of the southern boundary of the objection site, the urban greenspace provides a buffer between the housing and the industry. It may be possible to reduce the width of this buffer, whilst still retaining its function. However, because of the constraint on further residential development in this area imposed by the nearby chemical works, I consider that the urban greenspace designation should be retained for the whole of the site.

Recommendation

6.74 **I recommend that no modification be made to the RDDP.**

BS/H2.3: Hazel Hirst Quarry, Queensbury, Bradford

Objectors

2464/8551 *Accommodate UK Ltd*
3435/11801 *Patchett Homes Ltd*

Summary of Objections

- This site should be deleted in favour of more sustainable sites closer to Queensbury centre.
- The access constraints can be overcome, and the site should be brought forward to phase 1.

Inspector's Reasoning and Conclusions

6.75 This is a former quarry, and is previously-developed land as defined in PPG3. Being within an urban area, it is a first choice of site in the RPG12 locational sequence for the allocation of housing. However, it is some distance from local facilities in the centre of Queensbury, and from bus services, and thus a less sustainable location than other sites allocated as phase 1 housing sites. Also, I note the Council's view that there could be difficulties in accommodating the additional traffic likely to be generated by this site, without off-site improvements. In these circumstances, I do not consider that it should be a phase 1 allocation, but see no reason why the constraints could not be overcome for it to be developed during phase 2 of the plan period.

Recommendation

6.76 **I recommend that no modification be made to the RDDP.**

BS/H2.4: Hill End Lane, Queensbury, Bradford

Objectors

2464/8554 *Accommodate UK Ltd*
3435/11802 *Patchett Homes Ltd*

Summary of Objections

- This site should be deleted in favour of more sustainable and deliverable sites closer to Queensbury centre.
- The access constraints can be overcome, and the site should be brought forward to phase 1.

Inspector's Reasoning and Conclusions

6.77 This site is an open field, adjoining BS/H2.3 above, and hence similar considerations apply in relation to local facilities, bus services and access. Being within an urban area, it is quite a high priority site in the locational sequence for the allocation of housing, but it is in a less sustainable location than other sites allocated as phase 1 housing sites. In these

circumstances, I do not consider that it should be a phase 1 allocation, but see no reason why the constraints could not be overcome for it to be developed during phase 2 of the plan period.

Recommendation

6.78 **I recommend that no modification be made to the RDDP.**

BS/H2.8 (formerly BS/H1.21), SOM/BS/GB1/297 & SOM/BS/NE9/297: Abb Scott Lane, Low Moor, Bradford

Objectors

469/605	<i>Mr & Mrs Kent</i>
864/10831 & 10874	<i>Mr N Barker</i>
2492/5562	<i>Mr Barrie Sharp</i>
2494/8004	<i>Mrs A M C Sharp</i>
2543/5553	<i>Mr Albert Raper</i>
2552/8562	<i>Mr Wilfred Jones</i>
2780/8566	<i>Mrs K M Brown</i>
3118/6899	<i>Ms J Pratt</i>
3125/7997	<i>Mrs B Marsland</i>
3339/5051	<i>Miss Dorothy P Ellis</i>
3903/5571	<i>Mr George Bastow</i>
4167/5557	<i>Tarmac Northern Ltd</i>
4544/9634 & 10809	<i>Bradford No.1 Angling Club</i>

Summary of Objections

- The allocation should be deleted, and preference given to brownfield sites.
- There are poor services and insufficient schools.
- There is enough housing in the area, and further development will increase competition for jobs.
- Development would detract from Judy Woods, and from the setting of Royds Hall, which is a listed building.
- Local roads are unsuitable to cope with increased traffic.
- The site is close to Royds Hall Dam, a popular venue for anglers, and plans should include an access road to the lake edge, a car park for anglers, and fencing.
- Possible leukaemia risk from power lines.
- The land should return to common land/Green Belt/agriculture/nature reserve.

Inspector's Reasoning and Conclusions

6.79 This was a phase 1 allocation in the FDDP, but was changed to a phase 2 allocation, as a result of an anticipated over-supply of housing land. This is an area of grazing land, fronting onto Abb Scott Lane in places, and with residential development to the east and west. To the south is open land within the Green Belt, across which are well-established paths giving access to Royds Hall Dam and the wider countryside. Whilst I can appreciate that local residents would like to see the land remain open, there is insufficient previously-developed land within the district to accommodate all the required housing, and hence there must be some allocations on greenfield sites. The site is reasonably well

located for local shops and schools, and a short distance from a 10-minute bus service. I note the concern of the objectors about traffic, but the Council's Highways Service raised no objection to the allocation. Whilst the combined effect of this and any other developments proposed nearby may worsen certain local difficulties, I see no reason to doubt that the highway network as a whole would be able to cope with the increased traffic.

6.80 This land is not currently within the Green Belt and, since I consider that it is appropriately allocated for housing, there are no exceptional circumstances for altering the Green Belt boundary to include this land. Neither is there any evidence that the land is of significant nature conservation value.

6.81 In relation to the detailed points raised by objectors, Royds Hall is some distance away, as are Judy Woods, and access to Royds Hall Dam could be provided when the site is developed. Government guidance on the potential health risks from overhead power lines indicates that there is no convincing evidence of a link, but this is a further matter to be taken into consideration at the detailed planning stage.

Recommendation

6.82 **I recommend that no modification be made to the RDDP.**

SOM/BS/H2/267, SOM/BS/H2/281 & SOM/BS/H2/292: land at Julian Drive & Lingfield Terrace, Clayton Heights, Bradford

Objector

4317/10396, 10769 & 10782 *Mr E Upite*

Summary of Objections

- The land should be removed from the Green Belt and allocated for housing or safeguarded land.

Inspector's Reasoning and Conclusions

6.83 I have considered these objections in relation to SOM/BS/H1/267, SOM/BS/H1/281 and SOM/BS/H1/292 above, to which reference should be made.

Recommendation

6.84 **I recommend that no modification be made to the RDDP.**

Chapter 7: Town Centres, Retail and Leisure Developments

BS/CR4.10 & SOM/BS/CR4/416: Bankfoot (Manchester Road)

Objector

1588/12348 & 12349 *Mr P M Coote*

Summary of Objections

- The extent of the local centre should include the car parks, and other land within the curtilage of the properties on Manchester Road.

Inspector's Reasoning and Conclusions

- 7.1 The objections refer to two areas, the large car park and service area to the west of the centre, and the car park to the Red Lion public house, together with other open land to the rear of adjoining properties.
- 7.2 The RDDP excludes car parks where they are on the edge of centres, but includes them where they are surrounded by retail or other uses. In my view car parks and service areas are an integral part of a centre and it is inappropriate to differentiate between those within or on the edge of a centre. Policy CR4 would restrict development to that which is appropriate in scale to the role of the centre and the size of community it serves, and any proposals would have to provide adequate car parking. This should ensure that no development takes place that would conflict with local and national planning guidance.
- 7.3 In relation to the specific areas referred to in the objection, I consider that the main car park to the west of the centre, and the pub car park to the east should be included within the centre boundary. However, the remaining land to the rear of the properties to the east of Manchester Road is not currently used for parking or other uses integral to the operation of the centre, and I see no justification for including it.

Recommendation

- 7.4 **I recommend that the RDDP be modified by the inclusion within the Bankfoot local centre of the car park and service area to the west of the centre, and the car park to the Red Lion public house.**

BS/CR4.15: Queensbury

Objector

2542/1277 *Yorkshire Co-operatives*

Summary of Objection

- The local centre should be extended to include the Co-op car park.

Inspector's Reasoning and Conclusions

- 7.5 The RDDP excludes car parks where they are on the edge of centres, but includes them where they are surrounded by retail or other uses. In my view car parks and service areas are an integral part of a centre and it is inappropriate to differentiate between those within or on the edge of a centre. Policy CR4 would restrict development to that which is appropriate in scale to the role of the centre and the size of community it serves, and any proposals would have to provide adequate car parking. This should ensure that no development takes place that would conflict with local and national planning guidance.
- 7.6 Whilst the Council describes the Co-op car park as being on the periphery of the centre, it appears to me to be at the core of the centre, and essential to the operation not just of the store but of the centre as a whole. It should therefore be included in the local centre boundary.

Recommendation

- 7.7 **I recommend that the RDDP be modified by the inclusion of the Co-op car park within the Queensbury local centre boundary.**

BS/CR4.16: Wibsey

Objector

2542/1282 *Yorkshire Co-operatives*

Summary of Objection

- The local centre should be extended to include the Co-op car park.

Inspector's Reasoning and Conclusions

- 7.8 The RDDP excludes car parks where they are on the edge of centres, but includes them where they are surrounded by retail or other uses. In my view car parks and service areas are an integral part of a centre and it is inappropriate to differentiate between those within or on the edge of a centre. Policy CR4 would restrict development to that which is appropriate in scale to the role of the centre and the size of community it serves, and any proposals would have to provide adequate car parking. This should ensure that no development takes place that would conflict with local and national planning guidance.
- 7.9 Whilst the Co-op car park is on the edge of the centre as defined by the Council, the centre extends along the other side of High Street beyond the car park, and hence its inclusion would not extend the centre in this direction. In my view the car park is essential to the operation of the store, and the centre as a whole, and should be included in the local centre boundary.

Recommendation

- 7.10 **I recommend that the RDDP be modified by the inclusion of the Co-op car park within the Wibsey local centre boundary.**

BS/CR4.17: Wyke

Objector

2542/1285

Yorkshire Co-operatives

Summary of Objection

- The local centre should be extended to include the Co-op car park.

Inspector's Reasoning and Conclusions

7.11 The RDDP excludes car parks where they are on the edge of centres, but includes them where they are surrounded by retail or other uses. In my view car parks and service areas are an integral part of a centre and it is inappropriate to differentiate between those within or on the edge of a centre. Policy CR4 would restrict development to that which is appropriate in scale to the role of the centre and the size of community it serves, and any proposals would have to provide adequate car parking. This should ensure that no development takes place that would conflict with local and national planning guidance.

7.12 However, in this particular case, there is already an extensive area of car parking included within the boundary of the local centre. The additional area to which this objection relates is not in use at present, and appears unrelated in scale to the existing retail provision. I therefore consider that it should remain outside the local centre boundary.

Recommendation

7.13 **I recommend that no modification be made to the RDDP.**

Chapter 8: Transport and Movement

BS/TM4.1: Low Moor, Bradford

Objectors

2753/4788	<i>Miss Angela Briggs</i>
2869/5034	<i>Mrs Christine Briggs</i>
4170/8557	<i>McLean Homes Ridings Ltd</i>
4185/10391	<i>Ogden Group of Companies</i>

Summary of Objections

- Additional traffic will be drawn to the area to use the Park and Ride.
- Reference should have been made to the link between the proposed housing site at Lower Woodland Farm (BS/H2.7) and the new station, having regard to creating a potential sustainable transport link to the city centre.
- There is a lack of specific detail.

Inspector's Reasoning and Conclusions

- 8.1 RPG12 indicates that improved rail services have an important contribution to make to increasing travel choice, reducing dependency on the car, and tackling problems of congestion. A key element in encouraging more sustainable travel is the improvement of integrated modes of transport. Accordingly, both a re-opened station and associated Park and Ride facility are proposed within the RDDP on the Bradford-Halifax rail line on land to the south-western side of Cleckheaton Road. The rail station is included within the West Yorkshire Local Transport Plan. Access to the station and Park and Ride would be off New Works Road. The provision of a Park and Ride scheme and station would be likely to result in some extra traffic within the immediate area. However, this has to be considered within the wider context that such facilities are likely to contribute to overall greater sustainability, in that the transfer of passengers to rail will reduce the number and length of journeys that would otherwise be made by car. Specific off-road parking would be provided adjacent to the station and traffic management measures could be introduced, if necessary, to regulate parking within nearby streets.
- 8.2 Lower Woodlands Farm was previously allocated for housing but within the RDDP is now safeguarded land. I am recommending that this designation be deleted as the site is within the urban area, but that it remain unallocated. Hence I do not consider there to be a need to make reference to any linkage between this site and the station/Park and Ride facility. The objection to lack of specific detail regarding these facilities was raised by the landowners on whose land these were shown as being sited within the FDDP. The facilities have now been moved to the opposite side of Cleckheaton Road on land which is not in their control. The objectors welcome this move. I consider the RDDP is sufficiently clear as to where it is intended the station and Park and Ride are to be sited.
- 8.3 I note that on the Proposals Map in the FDDP the site for the station and Park and Ride is allocated for employment purposes (BS/E1.24), in respect of which there have been no duly made objections. Even though it is now indicated on plan within the RDDP that this land is to be used for the station and Park and Ride there is still reference within the Bradford South Constituency Proposals to the allocation under BS/E1.24. As the site is

only some 0.72 hectares in extent I believe it to be too small to cater for employment uses, a station and Park and Ride facilities. I consider that the BS/E1.24 allocation should be deleted.

Recommendation

8.4 I recommend that the RDDP be modified by the deletion of the employment allocation BS/E1.24 but that no other modification be made to the RDDP.

BS/TM6.1: Outer Ring Road Bus Link, Bradford

Objector

4189/6601 *Parkside Securities Ltd*

Summary of Objection

- The notation on the Proposals Map, insofar as it relates to the West Bowling employment site, could be removed as agreement has been reached on the relevant aspects as part of planning applications on the site.

Inspector's Reasoning and Conclusions

8.5 The West Bowling Golf Course is a large employment allocation site in the RDDP with frontage onto the six-lane dual carriageway of Rooley Lane. This road has been indicated on the Proposals Map as an addition to the Bus Priority Network to facilitate public transport access to planned developments. Policy TM6 recognises the importance of public transport movement throughout the district and the need to relate the provision of transport facilities to additional developments, with contributions from them. The aspirational addition to the bus network is not tied to any one specific planning application. It needs to be considered in the wider context of the potentially substantial amount of employment-generating uses that could be established within this general area and the need to cater for the transport needs of employees in a sustainable way. No development has yet taken place within the West Bowling site and I consider the notation should remain to ensure the future application of this policy.

Recommendation

8.6 I recommend that no modification be made to the RDDP.

BS/TM7.1: Low Moor, Bradford

Objector

4185/10390 *Ogden Group of Companies*

Summary of Objection

- No objection to the principle of Park and Ride close to, but not on, the objector's land, but further clarification and details are needed.

Inspector's Reasoning and Conclusions

8.7 On the Proposals Map in the FDDP both a new station and a Park and Ride facility were shown diagrammatically as lying to the north-east of Cleckheaton Road on land within the objector's ownership. Within the RDDP these are now shown as being on land to the south-west of the road not within the objector's ownership. The objector welcomes the change. Although the objection has not been formally withdrawn I consider that it has effectively been resolved by the change made in the RDDP.

Recommendation

8.8 **I recommend that no modification be made to the RDDP.**

BS/TM7.2: Odsal, Bradford

Objector

2753/5032 *Miss Angela Briggs*

Summary of Objection

- Concern about the impact of any Park and Ride scheme on the wildlife of the area if this were to be on sloping land.

Inspector's Reasoning and Conclusions

8.9 The Park and Ride proposal forms part of the South Bradford Integrated Transport Improvements, with high priority being given to the use of public transport modes as an alternative to the private car. Access to the area would be from a new link road from Staithgate Lane.

8.10 The Proposals Map only shows a diagrammatic position for the Park and Ride. The Council indicates that the area under consideration does not extend onto the southern sloping area behind Odsal Stadium, which is the objector's area of concern. The detailed development implications for wildlife would be a matter for consideration nearer the implementation stage, when any proposal would have to be considered against other plan policies. These include Policy NE10, which seeks to ensure the protection of important wildlife habitats for protected species. As a consequence, I do not consider any modification to the RDDP to be necessary.

Recommendation

8.11 **I recommend that no modification be made to the RDDP.**

BS/TM20.7: Toad Holes Beck, Oakenshaw, Bradford

Objectors

4143/10814 *Mr Spragg*

Summary of Objections

- The proposed cycleway should be routed along Commondale Way instead of through the open space area.
- The proposed cycleway should be routed so that it would not compromise or conflict with employment development.

Inspector's Reasoning and Conclusions

- 8.12 A cycleway is shown on the Proposals Map going through the Toad Holes Beck area, following the line of Furnace Lane from its junction with Commondale Way. For the most part Furnace Lane is a track without a hard surface running to the rear of the employment premises served from Commondale Way.
- 8.13 The potential conflict between cyclists and heavy goods vehicles in an employment area should be avoided wherever possible. In the case of Toad Holes Beck the proposed route provides good access to the employment areas in the vicinity, in a safer environment than along Commondale Way, which is used by heavy goods vehicles serving the employment premises. Whilst the Toad Holes Beck area presents some safety issues, the line of the cycleway can be kept well clear of any problematic areas. I do not consider that the access provided by the cycleway would necessarily result in any increased trespass or vandalism; indeed more formal regular usage might help to deter such anti-social activities.
- 8.14 The cycleway access from Commondale Way might cause some disruption to the site suggested for employment in objection reference SOM/BS/E1/168, but I consider that this could be overcome. In any event I have recommended against such employment use due to the importance of the undeveloped area to the character of the locality.
- 8.15 I note that a cycleway is also proposed to run through part of BS/E1.23, and that section that I recommend should be allocated for housing. In that case I consider that the positioning of the cycleway alongside the railway to the edge of the site would provide a safe route separated from industrial traffic. In general such routes need to provide a balance between safe and pleasant surroundings, and ensuring good access to employment and housing areas.
- 8.16 I conclude, therefore, that the proposed route of the cycleway is appropriate and acceptable.

Recommendation

- 8.17 **I recommend that no modification be made to the RDDP.**

BS/TM20.11: Local Cycle Network

Objector

Summary of Objection

- The UDP needs to make it clear how connections will be made to adoptable roads.
- There could be a possible impact on the redevelopment of the site.
- It would result in an inefficient use of valued brownfield land for employment purposes.
- The mix of cycle and vehicular traffic could compromise safety.
- The route would be unattractive through an employment site and would be better directed across open land to the west.

Inspector's Reasoning and Conclusions

8.18 I have dealt with this objection in relation to BS/E1.23, to which reference should be made.

Recommendation

8.19 **I recommend that no modification be made to the RDDP.**

BS/TM21.1: Staithgate Lane South, Low Moor, Bradford (BS/E1.22)

Objector

4185/10865 *Ogden Group of Companies*

Summary of Objection

- The identification of the site for a potential rail freight facility should be deleted, as it will hinder other appropriate development.

Inspector's Reasoning and Conclusions

8.20 I have considered this matter in relation to BS/E1.22 above. The identification as a potential rail freight facility site is only indicative and not prescriptive. Other development covered by Policy E1 is acceptable, but it is sensible to refer to the fact that the site may have particular potential for rail freight facilities.

8.21 I conclude that the identification is reasonable and appropriate, and need not hinder the achievement of the development of the site for other acceptable employment uses.

Recommendation

8.22 **I recommend that no modification to the RDDP be made.**

Chapter 10: Built Heritage and the Historic Environment

POLICY BS/BH15: Historic Battlefields

Objectors

2792/5850 *Commercial Development Projects Ltd*
3860/10494 *Mrs R Skinner*

Summary of Objections

- The Adwalton Moor battlefield is incorrectly shown on the Proposals Map and the policy would interfere with employment development.

Inspector's Reasoning and Conclusions

10.1 I consider this site in relation to reference BS/E1.11 above, where I conclude that the battlefield notation for much of the site is appropriate.

Recommendation

10.2 **The recommendation is given under reference BS/E1.11 above.**

Chapter 12: Open Land in Settlements

BS/OS1.4: South Bradford Golf Course, Bradford

Objectors

4143/5047 *Mr Spragg*
4185/10355 *Ogden Group of Companies*

Summary of Objections

- The land should be allocated for employment use under Policy E1.

Inspector's Reasoning and Conclusions

12.1 I have considered this matter in relation to SOM/BS/E1/346 above, where I conclude that the land should be allocated for employment use.

Recommendation

12.2 **I recommend that the RDDP be modified by the deletion of the urban greenspace designation and the substitution of an allocation for employment under Policy E1 as set out in my recommendation relating to SOM/BS/E1/346.**

SOM/BS/OS1/164: Lower Woodlands Farm, Oakenshaw, Bradford (BS/UR5.2)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The land should be re-classified as urban greenspace.

Inspector's Reasoning and Conclusions

12.3 I have considered these objections in relation to BS/UR5.2 above, to which reference should be made.

Recommendation

12.4 **I recommend that no modification be made to the RDDP.**

BS/OS4.8: Northside Road, Lidget Green, Bradford

Objector

4168/5054 *Mackie & Partners*

Summary of Objection

- The site has been the subject of allocation and planning permissions for housing. It is suitable for various possible future uses.
- The land has not been used as a cricket pitch for years. It is surplus to requirements.

Inspector's Reasoning and Conclusions

- 12.5 The objection site was originally engineered, laid out and used as a cricket pitch in conjunction with a nearby business. The formal sports use ceased several years ago, but there is evidence of informal use, probably by local residents. There are a number of pedestrian accesses to the land from roads, the houses immediately to the south, and the public open space to the east. The land also constitutes part of an open break in the urban area.
- 12.6 The Draft Playing Pitch Strategy for the Bradford District reveals that there is no need for additional land for pitches in this constituency, even without counting the objection land as a part of the supply. It seems to me that any deficiency could be made up by reorganising the open space already available in the constituency.
- 12.7 The area within which the site is situated takes the form of a finger of Bradford South projecting into the Bradford West constituency. As a result the site is located quite close to housing areas in the latter constituency. In Bradford West, there are some deficiencies in pitch provision.
- 12.8 However, it is in the context of the Bradford Sports Action Zone (SAZ) that the greatest level of deficiency occurs. The site is adjacent to the original zone, and lies within the SAZ extension approved in April 2003. The existence of the zone, and the publication of a new edition of national policy in PPG17, are significant changes in circumstances since the allocation of the land for housing in the adopted UDP.
- 12.9 The zone (including the area south of Legrams Lane, not far from the site) is characterised by dense housing areas, high levels of social deprivation, and relatively little open space. Most of what exists is in the form of small, badly maintained kick-about or play areas surrounded by housing. The SAZ is deficient in provision for all sports, and local teams use facilities outside the zone. In my view the deficiencies which exist must be seen against the background of probable increases in demand, arising from population changes and a proactive approach to sport on the part of agencies active in the SAZ.
- 12.10 The pitch strategy can only be seen as part of the robust and up-to-date assessment required by PPG17. There has been no equivalent assessment of the need for informal open space, and that is what the site is used for now. Without a full assessment I conclude that the land has not clearly been shown to be surplus to requirements, bearing in mind all of the functions that open space can perform. Also, such indications as there are of the views of the local community suggest a demand for sports activities and a desire to reclaim outdoor spaces.
- 12.11 The Council-owned open space east of the objection land is not a substitute for the site itself. The Council land is let to a football club during the season. It is not suitable for cricket use as well. Cricket is popular amongst substantial sections of the local population. Furthermore, the deficiency of open space in the SAZ is likely to be such as to justify the retention of both pieces of land as open space.

12.12 Investment is likely to be necessary to turn the objection land back into a formal cricket pitch. This might be achieved by a lease to a club. There is no indication that the owners of the site would refuse to allow such a course of action, and PPG17 envisages the public use of privately owned areas. Agencies involved in the SAZ could assist in procuring investment in activities which could involve the communities using the land informally now.

12.13 My overall conclusion is that the objection site is not surplus to requirements as open space. It is of particular value to the local community, given all of the factors discussed above. It should be given protection through the medium of the Replacement UDP.

12.14 However the description of the site, given in the relevant constituency volume of the RDDP, should be amended to reflect the present position regarding usage.

Recommendation

12.15 **I recommend that the RDDP be modified as follows:**

BS/OS4.8 NORTHSIDE ROAD, LIDGET GREEN

Replace the first sentence with “Private former cricket ground, used informally for recreational purposes, and located in a densely populated area”.

SOM/BS/OS7/164: Lower Woodlands Farm, Oakenshaw, Bradford (BS/H2.7)

Objectors

1331/12805 *Ms Joan Clarke*
2662/12803 *Mrs K Orange*

Summary of Objections

- The land should be re-classified as village greenspace.

Inspector’s Reasoning and Conclusions

12.16 I have considered these objections in relation to BS/UR5.2 above, and conclude that the land need not be retained for open space.

Recommendation

12.17 **I recommend that no modification be made to the RDDP.**

Chapter 13: Green Belt

BS/GB1.10, SOM/BS/E1/130 & SOM/BS/H1/130: Land to NW of Booth Holme Farm, Westgate Hill, Bradford

Objector

4000/8543, 8545 *Mr David Inskip*
& 8547

Summary of Objections

- The site should be removed from the Green Belt and designated for low cost housing or light industry.

Inspector's Reasoning and Conclusions

13.1 This piece of land forms a gap in a loose-knit ribbon of development along the north side of Westgate Hill Street, whilst the south side of the road is more closely developed with a mix of housing and employment uses. Whilst this is only a small parcel of open land, there are views across the site to the wider Green Belt beyond, and it appears as an integral part of the countryside. Although I accept that this land could serve a number of the purposes of including land in the Green Belt, there has been little material change since the Green Belt boundary was confirmed in the adopted UDP, and boundaries should only be altered in exceptional circumstances. The Council suggests that the existing Green Belt boundary is poorly defined, but there is a fence, and the boundary can be clearly identified by reference to other features. I do not therefore consider that there are exceptional circumstances that justify an alteration to the Green Belt boundary on this land.

13.2 In relation to its suitability for housing, the location strategy of the plan gives preference to sites within the urban area, which are well located in relation to local facilities. This site is some distance from shops, schools and other facilities, and it would not therefore be a sustainable location. Nor do I consider it suitable for employment use since the predominant character on this side of the road is residential. There could also be difficulties providing a safe access onto this busy major road. I do not therefore consider that it should be allocated for either housing or employment.

Recommendation

- 13.3 **I recommend that no modification be made to the RDDP in respect of the allocation of the site for housing or employment, but that Proposal GB1.10 be deleted.**

BS/GB1.32: Land fronting Highgate Road, Clayton Heights

Objector

3435/5788 *Patchett Homes Ltd*

Summary of Objection

- There are no exceptional circumstances for including this land in the Green Belt. It has a commercial use and has no role to play in the functions of the Green Belt.

Inspector's Reasoning and Conclusions

13.4 This site was granted planning permission for a B1 office development in July 2002, and the Council acknowledges that it would not now be appropriate to include the site within the Green Belt. The published proposed changes dated January 2003 delete the Green Belt designation, and the objectors have confirmed that this meets their objection.

Recommendation

13.5 **I recommend that the RDDP be modified by the deletion of Proposal BS/GB1.32 as indicated on page 48 of the Council's proposed changes, dated January 2003.**

SOM/BS/GB1/164: Lower Woodlands Farm, Oakenshaw, Bradford (BS/UR5.2)

Objectors

416/11106	<i>Mrs A Graven</i>
895/9636	<i>Mr Terance Ian Sugden</i>
971/7969	<i>Mr & Mrs W Spencer</i>
1125/7975	<i>Mrs Ellen Sharp</i>
1163/8461	<i>Mrs A E Andruszkim</i>
1191/9643	<i>Mr P Graven</i>
1210/12529	<i>Mr Michael Dickinson</i>
3314/6886	<i>Mr & Mrs D H Sirs</i>
3315/6878	<i>Mr & Mrs Buckle</i>
3317/10348	<i>Mrs Marcia Thomas</i>
3319/10351	<i>Mr David A Thomas</i>
4290/12135	<i>Mr Simon Hoskins</i>
4297/10862	<i>Mr Peter Benson</i>
5034/12813	<i>Mrs Beryl Pearson</i>

Summary of Objections

- The land should be re-classified as Green Belt.

Inspector's Reasoning and Conclusions

13.6 I have considered these objections in relation to BS/UR5.2 above, to which reference should be made.

Recommendation

13.7 **See my recommendation on BS/UR5.2.**

SOM/BS/GB1/166: Land at Knowle Farm, Knowle Lane, Wyke, Bradford

Objector

3875/8435 *Mr Edward Barraclough*

Summary of Objection

- This land should be removed from the Green Belt.

Inspector's Reasoning and Conclusions

13.8 Whilst this site is largely developed, the farmhouse and cottage relate to the surrounding countryside, and not to the urban area to the west. I therefore consider that the land is appropriately included within the Green Belt, and there are no exceptional circumstances which would justify an alteration to the Green Belt boundary.

Recommendation

13.9 **I recommend that no modification be made to the RDDP.**

SOM/BS/GB1/262, SOM/BS/H1/262.01 & SOM/BS/OS1/262: Shibden Valley, Queensbury

Objector

4329/8906/7 & 8906 *Mr G Haley*

Summary of Objections

- The land should be removed from the Green Belt and allocated as urban greenspace, with a small part allocated for housing.

Inspector's Reasoning and Conclusions

13.10 The objection site is a partly wooded valley towards the south-western edge of Queensbury. The land is largely surrounded by built development, and appears as a tongue of open land extending into the urban area. The tongue is particularly narrow at its open end. I note that the Council proposes to remove two small areas of adjoining land from the Green Belt because they no longer serve a Green Belt purpose, and this has slightly reduced the width of the Green Belt at its narrowest point. In my view the land is too narrow and surrounded by development to function as Green Belt. In view of the need for housing land, and other considerations I set out elsewhere, I conclude that exceptional circumstances exist for removal of the site from the Green Belt. However, the same considerations mean that I do not conclude that the land should be designated as urban greenspace, although it has the necessary characteristics. Because of the competition for land for other uses, the Council should first assess the site against relative sustainability and other factors as part of the search for further potential housing land which I have recommended.

13.11 The part of the site where a residential allocation is requested is less than 0.4 hectares in area, too small to be shown as a specific allocation.

Recommendation

13.12 I recommend that the RDDP be modified by the deletion from the Green Belt of land at Shibden Valley, Queensbury.

SOM/BS/GB1/267, SOM/BS/GB1/281 & SOM/BS/GB1/292: land at Julian Drive & Lingfield Terrace, Clayton Heights, Bradford

Objector

4317/8902, 10781 & 10780 Mr E Upite

Summary of Objections

- The land should be removed from the Green Belt and allocated for housing or safeguarded land.

Inspector's Reasoning and Conclusions

13.13 I have considered these objections in relation to SOM/BS/H1/267, SOM/BS/H1/281 and SOM/BS/H1/292 above, to which reference should be made.

Recommendation

13.14 I recommend that no modification be made to the RDDP.

SOM/BS/GB1/280: Langberries, Baldwin Lane, Clayton, Bradford

Objector

4317/8898 Mr E Upite

Summary of Objection

- The land should be allocated as a golf course.

Inspector's Reasoning and Conclusions

13.15 A golf course would be an appropriate use in the Green Belt, and hence would accord with Policy GB1, and Government advice as set out in PPGs 2 and 17. In these circumstances I see no merit in making a specific allocation, which could preclude other acceptable uses.

Recommendation

13.16 I recommend that no modification be made to the RDDP.

SOM/BS/GB7/403: Queensbury Reservoir

Objector

4174/11121

Keyland Developments Ltd

Summary of Objection

- There should be a new policy to cover infilling and redevelopment at Major Developed Sites (MDS) in the Green Belt, including Queensbury Reservoir.

Inspector's Reasoning and Conclusions

13.17 In response to an objection by Keyland Developments Ltd, Policy GB6A relating to MDS in the Green Belt was included in the RDDP. This lists a number of water or sewage treatment works but did not include Queensbury Reservoir. This occupies a site of some 0.8 hectares, and comprises a number of above-ground tanks, together with telecommunications masts and two residential properties. The Council has used a guideline for major sites of 5 hectares of developed area. This figure has been the subject of objection, and I accept that some smaller sites could be considered as MDSs if they contain substantial built development. However, this particular site is both small in size and the main structures within it are low and unobtrusive. I therefore consider that it would be inappropriate to identify it as a MDS, to which Policy GB6A would apply.

Recommendation

13.18 **I recommend that no modification be made to the RDDP.**

Chapter 14: Natural Environment and the Countryside

SOM/BS/NE9/164: Lower Woodlands Farm, Oakenshaw, Bradford (BS/UR5.2)

Objectors

4254/10857	<i>Mr Michael Crossley</i>
4676/10810	<i>Mr & Mrs Philip & Emma Ferdinand</i>
4950/12507	<i>Mrs Emma Ferdinand</i>

Summary of Objections

- Loss of wildlife habitat.

Inspector's Reasoning and Conclusions

14.1 I have considered these objections in relation to BS/UR5.2 above, to which reference should be made.

Recommendation

14.2 **I recommend that no modification be made to the RDDP.**

Chapter 15: Natural Resources

SOM/BS/NR5/338.02: Fleet Lane, Queensbury

Objector

4588/11007 *Mr B Keegan*

Summary of Objection

- As the site has mineral reserves it would be inconsistent not to include it within the area of search for minerals.

Inspector's Reasoning and Conclusions

- 15.1 The Council agrees that the site is likely to be underlain by mineral reserves. It is excluded from the area of search because it lies within 250m of the urban area of Queensbury.
- 15.2 The 250m buffer zone is intended to provide a satisfactory separation between mineral working and urban settlements, in a broad brush depiction of areas where mineral working might be allowed. However, there are several reasons why I consider it should not be used to exclude the objection land from the area of search.
- 15.3 The areas of search are intended to guide the extractive industry as it looks for areas where aggregates are likely to be found. The protection of the amenities of the residents of nearby developed areas is a factor which should be taken into account in determining whether mineral proposals should go ahead. However, it is clear from the Council's answers to my questions that the assessment of such amenity effects is a matter which would assume prominence in the consideration of applications for planning permission for mineral extraction. Inclusion of a site within an area of search does not necessarily mean that permission would be granted, and exclusion does not automatically prevent a grant of permission.
- 15.4 The circumstances of a particular site and proposal would be of paramount importance in deciding whether residential amenity would be harmed. In Bradford District small-scale extraction, sometimes by hand rather than by machine, is practised on occasions. Control by planning condition is possible. In my view this part of the draft plan should not appear to pre-judge the outcome of a planning application.
- 15.5 The history of the selection of a buffer measurement of 250m is unclear. The precise figure does not appear to have any particular justification. Its application in this specific instance disregards the fact that there are relatively few dwellings in Queensbury within 250m of the centre of the site. A significant part of the Queensbury land within 250m is open space.
- 15.6 There is also some inconsistency in the way the buffer zone has been applied. It has been applied to the settlement of Queensbury but not to the settlement of Mountain, on the opposite side of the site. Mountain may not be an urban area, yet more dwellings in Mountain than in Queensbury are within 250m.

- 15.7 My overall conclusion is that the objection land should be included within the area of search. At the Inquiry it was explained that land south-west of the Pineberry Inn ought to be excluded from the objection site for reasons of ownership, and my conclusions and recommendations relate to the site as amended at the Inquiry. Nevertheless, the Council will need to consider whether land ownership is a significant factor in the consideration of where the boundary of this area of search should be drawn. The Council will also have to consider the wider implications of my conclusions on this site-specific objection.
- 15.8 Finally, although not the subject of objection, there is both inconsistency and incongruity in including the settlement of Mountain in the area of search. The mineral reserves are likely to underlie both Mountain and Queensbury, yet the area of search excludes only Queensbury. Clearly the mineral is sterilised where it lies beneath Queensbury. It is equally sterilised where it underlies the settlement of Mountain. Again the Council will need to consider this point.

Recommendation

- 15.9 **I recommend that the RDDP be modified as follows:**

Proposals Map

Include the objection site (as shown on the map attached to the objector's proof of evidence) within the aggregate area of search.

Chapter 16: Pollution Hazards and Waste

SOM/BS/P15/339: Huddersfield Road, Wyke

Objector

4598/11006

Mr J E Drake

Summary of Objection

- The site is available and suitable to meet the need for more landfill capacity.

Inspector's Reasoning and Conclusions

16.1 I have dealt in Chapter 16 of the Policy Framework volume of this report with the question of need for further landfill sites. There I conclude that there is not the evidence to allow for a decision either way, pending the completion of the relevant waste strategies. In these circumstances I support the use of a criteria-based policy for the determination of planning applications. It is not known whether the objection site would meet the criteria of the relevant RDDP policies. However, the site is well seen from Huddersfield Road, and any tipping proposal would need to be designed with great care to prevent harm to the character of the local landscape. Also it is not clear what the Best Practicable Environmental Option for the particular waste stream would be. Landfilling is the lowest level in the hierarchy of methods of waste treatment. It is possible, therefore, that the capacity of existing permitted landfill sites, together with higher level methods of waste treatment, would render landfilling at Huddersfield Road unnecessary.

16.2 In all the circumstances I consider that the objection site should not be allocated as a landfill site.

Recommendation

16.3 **I recommend that no modification be made to the RDDP.**