



WYG on behalf of Gladedale Estates Ltd  
Representor ID – 415 WYG

## EXAMINATION OF THE BRADFORD LOCAL PLAN CORE STRATEGY

### STATEMENT ONE - RESPONSE TO THE FOLLOWING MATTERS, ISSUES AND QUESTIONS:

#### MATTER 3: STRATEGIC CORE POLICIES

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## Statement For Examination of the Bradford Local Plan Core Strategy

### 1.0 Introduction

- 1.1 This statement is made by WYG on behalf of Gladedale Estates Ltd. It is made in response to the Matters, Issues and Questions identified by the Inspector for discussion at the forthcoming hearing sessions for the Examination of the Bradford Local Plan Core Strategy ("the Plan"). This statement supplements earlier submissions made on behalf of Gladedale Estates Ltd to the Core Strategy Development Plan Document Publication Draft in March 2014
- 1.2 In particular the submission is made in relation to Gladedale Estates Ltd land holding ("the Site") to the east of Otley Road, Menston, as indicated on the accompanying site location plan (Appendix 1).
- 1.3 This submission addresses the following Matters, Issues and Questions (Matter 3 Strategic Core Policies, SC5 and SC7) set out in the Schedule of Matters Issues and Questions for Examination. Many of the matters are interlinked and our submissions reflect this. This statement should be read in conjunction with our response to Housing Matters 4B, 4C, and 4E (Statement Two) and Matter 6C: Sub-Area Policies – Wharfedale (Statement Three).

### 2.0 MATTER 3: STRATEGIC CORE POLICIES

#### ***Key issue:***

***Is the Overall Approach and Key Spatial Priorities, the justification for the proposed Settlement Hierarchy, the principles of location of development, the general approach to the Green Belt, for Bradford, and the approach to development proposals in the South Pennine Moors Zone of Influence soundly based, effective, appropriate, deliverable, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with the latest national policy?***

#### ***Policy SC5 – Location of Development***

- a. What is the justification for setting the priorities and criteria for locating new development; is it supported by evidence, appropriate and soundly based?***
- b. Does the policy make the appropriate balance between prioritisation of brownfield land, use of brownfield land and windfalls, and greenfield land, and safeguarded land?***
- c. How will sites be assessed and are the accessibility standards inflexible?***

#### ***Policy SC7 – Green Belt***

- a. Is the proposed approach to the Green Belt appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy (NNPF; ¶ 84), particularly in terms of:***
  - i. identifying the exceptional circumstances necessary for using Green Belt land;***
  - ii. demonstrating the need to promote sustainable patterns of development, including the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns***

***and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (NPPF; ¶ 84);***

***b. Whether there should be a full or selective review of the Green Belt, and would such a review be co-ordinated and agreed with neighbouring authorities?***

***c. What evidence is available to justify decisions to release particular areas of Green Belt for development?***

***d. Should the Green Belt review also include Safeguarded Land?***

- 2.2 In response to the MIQs on Policies SC5 and SC7 we do not consider the Plan to be sound. We consider the approach to what is effectively a “selective review” of the Green Belt through the site allocations process is not an effective or positively prepared strategy, particularly given the level of housing development that is likely to be required from Green Belt allocations.
- 2.3 Paragraph 5.3.31 of the Plan confirms that as part of the process of producing the Allocations DPD the Council will engage with all stakeholders in assessing the range of development site options which are considered achievable and will continue to search for alternatives which would avoid or reduce Green Belt release. However, whilst we acknowledge the priority to protect Green Belt land this has to be balanced against what could be described as a severe housing shortage, and the clear requirement for Green Belt to contribute to that requirement.
- 2.4 The Plan at paragraph 5.3.29 re-affirms the need for significant change to the Green Belt using assumptions from the SHLLA and AMR. This is qualified by the Council’s estimation that land for around 11,000 dwellings will need to be provided from Green Belt releases (paragraph 5.3.30). By its own admission the Council confirm in paragraph 5.3.31 of the Plan states that based on the land supply constraints identified it is likely that *“Green Belt releases, though focused heavily on the main urban areas, will also be needed in many of the smaller settlements across the district.”*
- 2.5 In this context we consider the Strategic Core policies need to be more explicit in the approach to housing delivery and the assessment of Green Belt releases as part of that delivery. The Plan should set out a clear and coherent strategy, including a framework for undertaking the review of the Green Belt, having regard for the settlement hierarchy and identifying those locations which are most sustainable and which would not prejudice the purposes of including land within the Green Belt having regard for the NPPF. The objection to this element of the Plan has clear implications for the approach to the supply and distribution of housing development as set out in our responses to Matters 4B, 4C and 4E in Statement Two.

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- 2.6 Strategic Policy SC5, in particular bullet point 3, is a very general statement and underplays the significance that Green Belt releases will have in contributing to the Plans housing requirements as set out in paragraphs 5.3.30 & 5.3.31. SC5 (3) requires explicit reference to Strategic Policy SC7 (B), to ensure consistency in the approach across the 2 policies when assessing Green Belt releases.
- 2.7 SC5 (3) requires further clarification accordingly. We suggest the following wording, which would more accurately reflect the NPPF (paragraphs 83 & 84)."

*"Third priority to Local Green Belt releases in the built up areas of settlements in sustainable locations, having regard for the settlement hierarchy and where it would not prejudice Green Belt purposes".*

Appendix 1 – Site Location Plan

