



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

EXAMINATION OF THE BRADFORD LOCAL PLAN CORE STRATEGY

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

MATTER 4B: HOUSING SUPPLY

MATTER 4C: HOUSING REQUIREMENTS

MATTER 4E: HOUSING PROVISION

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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 4B, 4C, and 4E) 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 Matter 3: Strategic Core Policies (Statement One) and Matter 6C: Sub-Area Policies – Wharfedale (Statement Three).

2.0 MATTER 4B: HOUSING SUPPLY

Policy HO2 – Strategic Sources of Housing Supply

Key issue:

Is the approach to identifying the strategic sources of housing supply fully justified with up-to-date and reliable evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?

4.2 Policy HO2 – Strategic Sources of Housing Supply

- a. Is there sufficient evidence to justify the main strategic sources of housing supply, including completions and commitments, former RUDP sites, including safeguarded land, new deliverable/developable sites, area-based initiatives including Growth Areas, including Urban Eco-Settlement in Shipley/Canal Road Corridor, Bradford City Centre, SE Bradford, Queensbury, Thornton, Silsden and Steeton with Eastburn, Holme Wood Urban Extension, and local Green Belt releases;***
- b. Is the policy founded on an up-to-date, accurate and comprehensive assessment of housing land availability, including SHLAA?***
- c. Is a better strategic framework needed for designated Growth Areas?***

Statement For Examination of the Bradford Local Plan Core Strategy

- 2.1 We consider that this element of the Plan is unsound in that it is not positively prepared to ensure that the potential sources of housing supply will meet its objectively assessed housing needs. The approach to the potential sources of housing supply leaves considerable doubt how the 42,100 housing requirement will be met. It is clear that significant allocations will be required through the site allocations process and Green Belt releases (land for at least 11,000) will be a major element of that. The Plan states that the AMR and the SHLAA suitable now category, if all implemented, will still only deliver 46% of the District wide housing requirement (paragraph 5.3.27).
- 2.2 On this basis it is essential that the Plans Strategic approach provides sufficient flexibility to fully consider appropriate sites through the site allocations process. This must include provision for the appropriate consideration of Green Belt sites in sustainable locations well related to settlements and reflecting the approach to the settlement hierarchy. With specific reference to HO2 we consider the Policy is conservative and overly restrictive in terms of a realistic assessment of the potential sources of housing supply. In that context we do not consider the Plan to be consistent with the NPPF's ambition to significantly boost housing supply.
- 2.3 Our comments in relation to HO2 have significant implications for Policies HO3 (Distribution of Development), HO7 (Housing Site Allocation Principles) and the Sub Area Policies, as covered in our responses to Matters 4C and 4E. We consider all of these policies should be more positively prepared, particularly in relation to the approach to spatial delivery of housing and the settlement hierarchy.
- 2.4 We consider the Plan fails to identify sufficient opportunities, particularly within the Local Service Centres, to ensure it can meet its objectively assessed needs and provide a sufficient choice and flexibility of housing sites to deliver sustainable housing development, particularly in the early plan years, in accordance with the NPPF.
- 2.5 Our specific comments on HO2 relate to the points made on Matter 3: Strategic Core Policies (SC5 and SC7) (Statement One), in particular the need to appropriately consider Green Belt releases in sustainable locations, given the clear requirement for Green Belt releases to meet housing need. In this context we specifically object to Part (B.3) of Policy HO2 which sets out, "*Specific area based initiatives to help deliver the supply targets*". Part B.3 currently reads:

Statement For Examination of the Bradford Local Plan Core Strategy

"Local Green Belt releases where consistent with the Plan's sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area".

- 2.6 We maintain our earlier representations that latter part of the policy criteria is superfluous and the policy should be amended to read:

"Local Green Belt releases where consistent with the Plan's sustainability principles, having regard for the settlement hierarchy and where it would not prejudice Green Belt purposes".

- 2.7 The proposed changes would more accurately reflect the NPPF and reflect our comments made in relation to Policies SC5 and SC7. The proposed changes would also provide sufficient flexibility to consider appropriate allocations, on a District wide basis, to maximise the opportunity for sustainable locations, including Green Belt, to contribute to the District housing requirement. Consideration of potentially suitable sites should not be dependent on the sufficiency, or otherwise, of other potential sources of supply within a relevant settlement or Sub Area as currently set out in HO2, Part B3. The housing requirements are District wide and the Plan must provide for those requirements accordingly. The NPPF requires sufficient choice and flexibility to accommodate objectively assessed needs and respond to change. The policy of holding back potentially suitable, viable and deliverable sites by relevant settlement or Sub Area is considered unsound in this context and does not reflect the NPPF (paragraph 14.)

3.0 MATTER 4C: HOUSING REQUIREMENTS

Policy HO3 – Distribution of the Housing Requirement

Key issue:

Is the approach to the distribution of housing development to the various towns and settlements in Bradford fully justified with evidence, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

4.3 Policy HO3 – Distribution of Housing Development

a. Is there sufficient evidence available to justify the proposed distribution of housing development to the various towns and settlements in Bradford; and is the proposed distribution supported by the evidence?

b. Does the policy pay sufficient regard to viability considerations?

c. Does the policy pay sufficient regard to the infrastructure requirements (especially highways and transport modelling)?

d. Does the policy pay sufficient regard to constraint policies (especially in Airedale & Wharfedale)

e. Are the various proportions/amounts of housing development proposed for each for the towns and settlements fully justified with evidence?

- 3.1 The Plan makes it clear at paragraph 5.3.45 that the District contains a rich variety of assets, both within the rural and urban environments, and therefore it is important that as far as possible and practicable the distribution of development assists the retention and conservation of these assets.
- 3.2 With specific regard to Wharfedale the principal town of Ilkely has been identified as one such settlement where a cautious growth approach will be adopted due to its proximity to the designated North Pennine Moors SPA / SAC (paragraph 5.3.62). It is, therefore, essential that there is a sufficient supply of suitable, available and deliverable sites from the other key settlements in the settlement hierarchy in the Wharfedale Sub Area.
- 3.3 Menston has been identified as a "Local Growth Centre" second to Ilkley in the Wharfedale hierarchy, by virtue of its role, function and accessibility to the larger settlements of Bradford or Keighley. However, this level of housing development proposed to be accommodated there appears to be reliant solely on sources of supply from within the settlement limits as set out in the detail of the relevant Sub Area Policy WD1 (see separate Statement Three).
- 3.4 We consider this element of the Plan is overly restrictive and does not give due consideration to the potential benefits that sites in sustainable locations adjacent to a recognised settlement in the hierarchy and, which do not prejudice the objectives of Green Belt, may contribute not only to the Sub Area, but more importantly the District wide housing need. This point reiterates our comments in relation to Policy HO2 that the Plan requires sufficient choice and flexibility to accommodate the objectively assessed needs and respond to change. It is also essential that sites are considered in locations where there is strong market demand and housing development is viable and deliverable.
- 3.5 In this context we do not consider the distribution of the Plans housing requirement has been appropriately considered and as such is not justified, positively prepared and will not be effective over its period.
- 3.6 With specific regard to Menston we consider the Plan is particularly restrictive (WD1) in that it will provide limited, if any opportunity at all, for sites adjacent to the settlement boundary to be appropriately considered through the site allocations process. This will prejudice the potential for Menston to contribute to the Wharefdale Sub Area, particularly given the

Statement For Examination of the Bradford Local Plan Core Strategy

restrictive environmental considerations at Ilkley, but more importantly Menstons ability to contribute to the District wide housing need, where clearly careful consideration of Green Belt releases in sustainable locations which do not prejudice Green Belt will need to be appropriately considered given the significant shortage of housing land available from non Green Belt locations.

- 3.7 In summary Menston is recognised as an important settlement in the Wharfedale settlement hierarchy yet policy WD 1 is overly restrictive and, will potentially prevent suitable, viable and deliverable sites being promoted through the site allocations process. We do not therefore, consider that this element of the policy is effective, positively prepared, deliverable, soundly based and consistent with the latest national policy and guidance. This point has direct relevance to the MIQs on Matter 6C, the Wharfedale Sub Area Policies and in particular sub paragraph d.

d. Is there sufficient justification and evidence to support the specific proposals for development at Menston, limited to existing permissions and other opportunities within the settlement boundary, has the policy considered the infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)? Could this settlement take more housing development?

- 3.8 Related to our response to the MIQs on HO2 and HO3 we do not consider that there is sufficient justification to support the restrictive approach to housing growth in Menston when balanced against the overall Plan's housing requirement and the evident need for appropriately considered sustainable Green Belt releases. Menston clearly has an important role to play in the Wharfedale Sub Area and in that context we consider it has the capacity to accommodate further housing development and the Plan should provide sufficient flexibility to consider this appropriately through the site allocations process.
- 3.9 The 2011 Draft Settlement Study (Part 3) (Doc EB/042) at paragraph 5.10.13 confirms Menston has a good level of facilities with a doctor's surgery, a primary school and a post office within the area. It also confirms there are a number of other community facilities a library and community centre. There are some deficiencies in open space and recreational facilities but generally the study suggests these are minor.
- 3.10 The study recognises that Menston is a predominantly residential settlement which functions as a commuter settlement with good rail links to Bradford and Leeds centres. It has a mainline train service which offers direct routes to on the Wharfedale Line to Leeds, Bradford, Ilkley and smaller local stations. It also confirms that in terms of the natural environment

Statement For Examination of the Bradford Local Plan Core Strategy

Menston is surrounded by green field land and is located within the Wharfedale Landscape Character Area where the land surrounding the settlement is of medium sensitivity. There are no nature conservation designations within or in the vicinity of Menston.

- 3.11 Therefore, whilst the land outside the Menston settlement boundary currently lies within the Green Belt we consider there is capacity for further housing and the Plan should provide an appropriate framework for considering suitable sustainable opportunities, which may contribute to the Districts significant housing requirement, through the site allocations process, as opposed to creating barriers to suitable development opportunities which in our view policy WD1 as worded will do so.
- 3.12 We make these comments with specific reference to a 4.1 hectare site located to the eastern edge of the settlement and which we consider would provide a potentially suitable site adjacent to the settlement which should be considered through the site allocations process. The most recent SHLAA identifies the Site (Ref ME/013) as "amber" (Potentially Suitable – Local Policy Constraints) confirming it has the potential to deliver 107 homes. Whilst it is not explicit within the SHLAA we understand that the current Green Belt designation is the policy constraint being referred to in the SHLAA table. An extract of the SHLAA is included at Appendix 2.
- 3.13 The Site is considered to be in a sustainable location to the east of the built up area of Menston and benefits from good access to services and facilities. We consider that the Site can be sensitively developed in a way that represents a logical rounding off to the east of the settlement and creates some balance to the growth of the settlement with potential for direct access from the A65, minimising the potential impact of through traffic on the more localised network within the settlement.
- 3.14 We consider the Site would provide the opportunity for a viable and deliverable residential proposal in an area where there is market demand which could create a critical mass of development to contribute to the viability of existing facilities and services and make provision to further local infrastructure including, public transport, recreational spaces, education and affordable housing etc.
- 3.15 We consider that a site of this scale can be brought forward in a comprehensive way and there is encouragement for a larger scale of development rather than isolated sites as supported by Para 52 NPPF. There is a genuine opportunity for working with the local communities to explore the ability to deliver a scheme which could offer enhanced local

Statement For Examination of the Bradford Local Plan Core Strategy

facilities. This can be delivered in the context of an overall quality design that will generate an ability to achieve a distinctive character reflective of Menston and as such a 'sense of place'

- 3.16 Given the scale of the housing land requirement across the District, the Council will need to look at a range of solutions to meet the overall housing need. It is considered that where a settlement, recognised with the settlement hierarchy can be enlarged in a sustainable manner, it is an option worthy of being explored and this could be an attractive option to consider. The Plan therefore, requires the appropriate flexibility to consider such options through the site allocations process.
- 3.17 The development of the Site to the scale and quality envisaged, incorporating sustainability measures has the potential to result in an integrated and rounded settlement to the benefit of the wider community.
- 3.18 The Site would provide the opportunity to deliver an appropriate housing mix, including homes for the elderly and provision of affordable units as part of these proposals. The landowner would wish to work with the Council and the local community to provide the right mix and respond to the priorities in the area.
- 3.19 The site is well related to the main highway network and public transport facilities. The scale of this development will enable a comprehensive package of sustainable transport measures to be delivered more effectively.
- 3.20 All of the land is in single ownership and there are no legal or other constraints to prevent it being brought forward in the short term
- 3.21 The promoter of the site would be prepared to set up Consultative Forum to work with the local stakeholders, including the Neighbourhood forum, to explore how this site may be brought forward.
- 3.22 In conclusion, and in accordance with the NPPF, the Plan should ensure that there is sufficient choice and flexibility to accommodate the objectively assessed housing needs and respond to change. The housing requirements are District wide and the Plan must provide for those requirements accordingly and ensure that all potentially suitable opportunities can be appropriately considered through the site allocations process.

4.0 MATTER 4E: HOUSING PROVISION

Policy HO7 – HOUSING SITE ALLOCATION PRINCIPLES

Key issue:

Is the Council's approach to establishing housing site allocation principles consistent with national guidance (NPPF/PPG)?

4.4 Policy HO7 – Housing Site Allocation Principles:

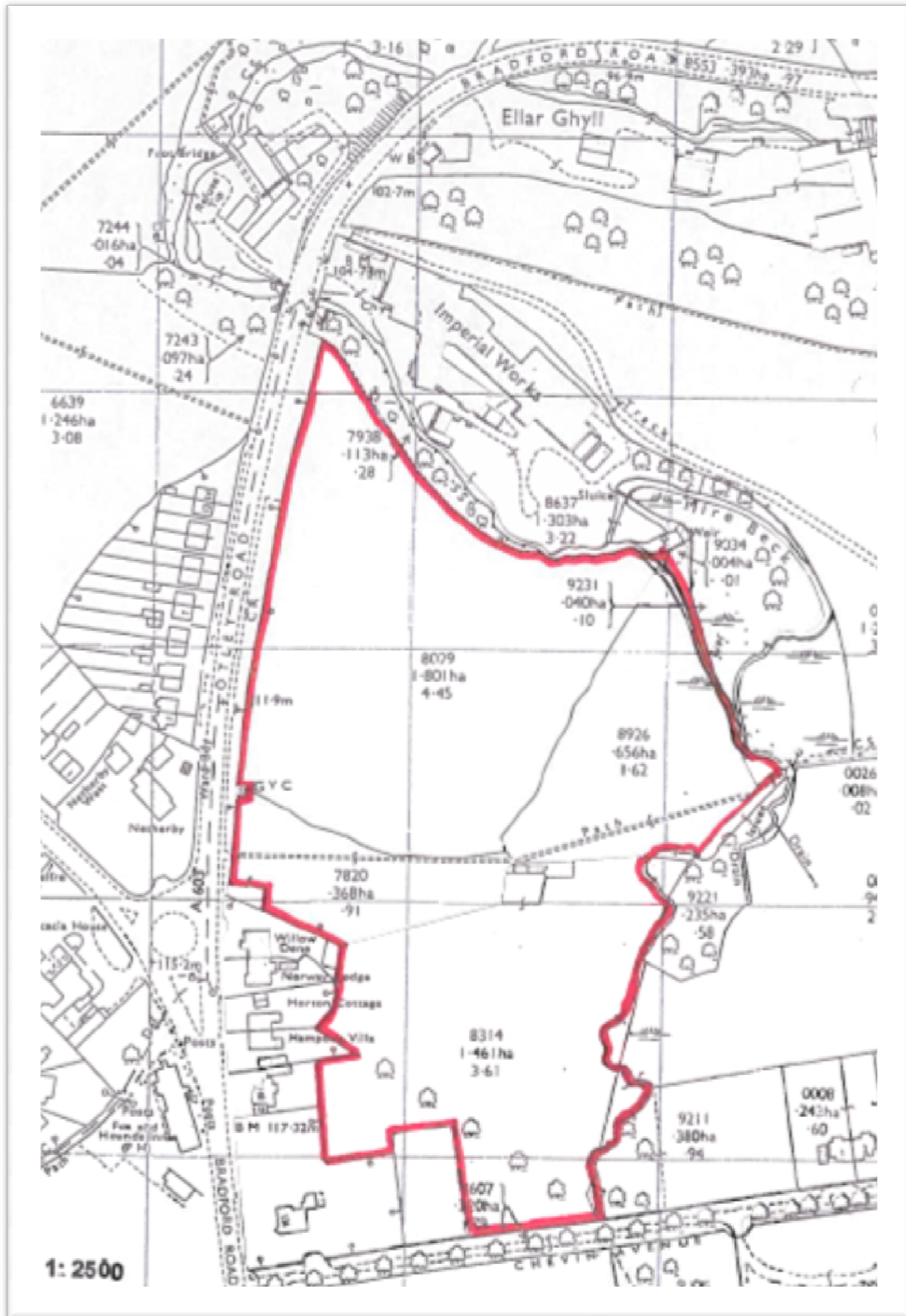
- a. Is the approach to establishing housing site allocations, including the various criteria, supported by evidence, and is it effective, clear and soundly-based?**
- b. Does the policy properly consider the balance between homes and jobs, and between prioritising brownfield against greenfield land?**
- c. Does the policy recognise Green Belt constraints and regeneration issues?**
- d. Does the policy consider maximising environmental benefits and minimising environmental impact?**

- 4.1 Our comments in relation to HO7 are linked to our comments on Policies HO2 and HO3. Part (A) of HO7 refers to the need to allocate sufficient deliverable and developable sites to meet the targets set out in Policies HO1 and HO3. In line with our previous comments, we consider that Part (A) is amended and also includes for the provision to undertake a Green Belt review so as to ensure that land which is currently designated as Green Belt, in sustainable locations, well connected to the settlements and which, if removed, would not prejudice Green Belt purposes, is considered when allocating housing sites. Part (A) should therefore read:

"The need to allocate sufficient deliverable and developable sites, including from Local Green Belt releases, to meet the targets set out in the Core Strategy Policies HO1 and HO3".

Part (E) of Draft Policy HO7 should also be amended to reflect that Green Belt land will be released to deliver some 11,000 homes across the Plan Period. It should also be stated in the Policy that in some circumstances the release of Green Belt land may offer the most sustainable and deliverable option to meet housing needs.

Appendix 1 – Site Location Plan



Statement For Examination of the Bradford Local Plan Core Strategy

Appendix 2 – Site Location Plan and SHLLA Extract

