

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

EXAMINATION OF THE BRADFORD LOCAL PLAN CORE STRATEGY

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

MATTER 6C: SUB-AREA POLICIES – WHARFEDALE

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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 6C: Sub-Area Policies Wharfedale) 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 SC5 and SC7 (Statement One) and Housing Matters 4B, 4C, and 4E (Statement Two).

2.0 MATTER 6C – SUB-AREA POLICIES – WHARFEDALE

POLICIES WD1-WD2 – WHARFEDALE

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?

2.1 Our responses to Matter 4C (HO3 Distribution of the Housing Requirement) relate directly to the Wharfedale Sub Area Policy WD1. Please refer to our Statement Two. Whilst we do not want to repeat those comments in full it is safe to say that we do not consider that there is sufficient justification to support the restrictive approach to housing growth in Menston when balanced against the Plans overall housing requirement. It is evident there will be a significant need for appropriately considered sustainable Green Belt releases to the main urban areas and the smaller settlements. 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." Menston as a smaller settlement will provide such an opportunity

particularly when considered in the context of the potential environmental constraints associated with the growth of the Wharefdale principal town Ilkey.

- 2.2 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.
- 2.3 Ilkely has been identified as one such settlement with assets 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.
- 2.4 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, the 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 Policy WD1.
- 2.5 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 development is viable and deliverable.
- 2.6 Menston clearly has an important role to play in the Wharfedale Sub Area and in that context we consider the settlement can accommodate further development as set out in our in the detail of our response to Policy HO3.
- 2.7 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. 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 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.

2.8 Therefore, whilst land outside the Menston settlement boundary currently lies within the Green Belt we consider there is capacity for further housing to be accommodated 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. By apparently restricting development to with the settlement boundary we consider 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.

Appendix 1 – Site Location Plan

