

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)  
(Representor ID: 423)*****Matter 6C: SUB AREA POLICIES (WHARFEDALE)*****Preamble**

1. On behalf of our client Persimmon Homes (West Yorkshire), we write to provide comments in response to the Inspector's schedule of Matters, Issues and Questions in relation to the Bradford Local Plan Core Strategy. This follows our previous comments made on the Publication Draft of the Core Strategy in March 2014.
2. Our client is one of the UK's leading house builders, committed to the highest standards of design, construction and service. They have a large number of site interests across Bradford District and therefore are very keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

**Persimmon Homes Site Interests in Bradford**

3. This is a list of our areas where our client has site interests:

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley
- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

- Nab Wood (Shipley)
- Heaton (North West Bradford)
- Daisy Hill (North West Bradford)

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 6C, which covers the sub area policies relating to Wharfedale, is contained in this statement. The responses are with reference the Inspector's headings and questions below:

***Policies WD1 and WD2 – WHARFEDALE***

**Strategic Pattern of Development**

**a) Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?**

6. The current approach by the Council through Policy WD1 of the Core Strategy is to restrict the growth of some of the settlements in Wharfedale in comparison with the requirements based purely on demographic changes through the plan period. This includes the Principal Town of Ilkley (including Ben Ryhdding) where there is a reduction of 394 units over the plan period (2013 – 2030).
7. The primary reasons for undertaking this approach are to concentrate housing development in areas requiring regeneration (Bradford and Shipley/Canal Corridor) and to take into to account the impact of the SPA/SAC on Wharfedale and accommodating the necessary buffer zone (2.5km).
8. In terms of the first reason stated; whilst our client agrees that there are areas of Bradford and its district that need regenerating, this needs to be balanced with the real requirement to deliver housing within the district to meet future needs, address previous shortfalls in housing provision and to achieve and maintain a 5 year supply of housing land. The area around Wharfedale presents some of the highest value market areas in Bradford and so the area's towns and villages are the most able to viably deliver the housing that the Council requires. This is clearly shown in the Council's *Local Plan Viability Assessment* and its associated update

(EB/045 and 046) which shows this area as one of the few in the district that can deliver housing in today's market conditions (see Figure 4.2 of the Local Plan Viability Assessment).

9. In contrast to this, many of the areas where housing has now been skewed towards (such as Bradford City Centre and South East Bradford) appear to be unviable in the current market conditions. This evidence points to the fact that the current distribution is not deliverable and that flexibility should be put in place to allow additional development in Wharfedale in the event sites elsewhere in the district are not viable.
10. Whilst our client notes the issues surrounding the SPA/SAC and its buffer zone, we believe that the current set of assessments are flawed, and that the application of the buffer zone requires further consideration. We detail this in our response to Matter 4C and Matter 3. Whilst our client would not wish to undermine the SPA/SAC and believes that part D of the policy still allow for protection of the SPA/SAC, additional housing can still be accommodated in sustainable settlements like Ilkley in the interest of achieving a balanced and deliverable pattern of development across the district.
11. When considering the evidence it is our client's view that a balance clearly needs to be struck between environmental considerations, viability considerations and the need to deliver housing. In relation to Wharfedale and Policy WD1 it is our client's considered opinion that this balance has not been met and that the Council are unnecessarily restricting development in Wharfedale to the detriment of the district as a whole.

**b) Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

12. The NPPF in paragraph 47 is clear that it is the local planning authority's role is to 'boost significantly' the supply of housing. Our client is not convinced that the current distribution as proposed through the Core Strategy as a whole can be achieved in a viable and sustainable manner. In respect of the specific approach to Wharfedale outlined in Policy WD1, this covers the most viable areas within Bradford's district to bring forward residential development and so has the potential to make a meaningful contribution to the Council's housing requirements over the plan period and to assist the Council in 'boosting significantly' housing building in Bradford and its district.
13. The current approach in WD1 however takes the approach of restricting housing building in Wharfedale to generally below levels of population change in this area for reasons of ecology

(through the SPA/SAC buffer zone) and a strategy for prioritising other areas of the district and brownfield land. Whilst these goals are laudable and our client would agree there needs to be considerations towards regeneration of areas of Bradford and in relation to protected ecological areas, the Council in the same instance must be able to show it is able to deliver housing in accordance with the strategy it has chosen.

14. It is our client's considered opinion that the current strategy for housing distribution is not supported by robust evidence and that many of the areas that the Council has decided to prioritise (Bradford City Centre and South East Bradford for instance) over and above Wharfedale have serious viability issues (see the *Local Plan Viability Assessment* and its update EB/045 and 046). This coupled with a policy which unnecessarily prioritises previously developed land (Policy HO6) and another which phases development so that deliver of housing is restricted in earlier years of the plan period (Policy HO4) means that the Council's ability to 'boost significantly' house building is severely compromised and will inevitably lead to an unbalanced and unsustainable housing market.

#### **New Development Locations**

**a) Is there sufficient justification and evidence to support the specific proposals for development at Ilkley, including urban redevelopment and the need to release Green Belt land and the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance of housing and employment land, impact on heritage assets and local communities, and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

15. Overall our client supports a focus of development in Ilkley and its associated settlements such as Ben Rhydding and is pleased that Policy WD1 recognises that there is a need for Green Belt release around Ilkley in order for it to meet its housing requirement over the plan period (see the 2013 Strategic Housing Land Availability Assessment ("SHLAA") (EB/049).
16. However as a Principal Town (and therefore a sustainable settlement), our client believes that Ilkley is capable of accommodating additional development to that outlined in the Core Strategy and notes that the 800 units proposed for the town over the plan period is below the requirement for the town based solely on demographic changes (which is 1,194 units). As outlined above, we fail to see the evidence justified for restricting housing growth in this town

and the information that has been presented (the need to focus on regeneration/previously developed land and the buffer zone in relation to the SPA/SAC) is not sufficiently robust.

17. As a sustainable settlement in an area of the district with a buoyant housing market, it should be the case that additional housing is given to Ilkley given the requirement of the Council to start delivering homes and the fact that the town lies in a higher market value area which is much more deliverable than other parts of the district. In this instance our client's land at Ben Rhydding is a suitable and sustainable site for housing in Ilkley (SHLAA reference IL/009): In this respect there is a compelling need to review the Green Belt around the settlement and for this to take place as part of the Core Strategy (rather than leaving it to a later Allocations DPD). This will provide certainty about where the town's housing will be delivered.
18. Whilst our client understands the Council's view on a SPA/SAC buffer zone in relation to Ilkley, our client believes Policy WD1 (through Part D) is able to address ecological concerns which would allow Ilkley/Ben Rhydding to provide additional housing to help the Council meet its requirements.

**b) Is there sufficient justification and evidence to support the proposed housing development at Addingham, limited to meeting local need, and has the policy considered the infrastructure requirements and local facilities, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/NPPG)?**

19. Our client has no specific comments relating to this area of Wharfedale outside of our general observations made above. We however reserve the right to comment on this area further in relation to our client's site interests.

**c) Is there sufficient justification and evidence to support the specific proposals for development at Burley-in-Wharfedale, including the need to release some local Green Belt land and the specific projects listed, and 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/NPPG)? Could this settlement take more housing development?**

20. Our client has no specific comments relating to this area of Wharfedale outside of our general observations made above. We however reserve the right to comment on this area further in relation to our client's site interests.

**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/NPPG)? Could this settlement take more housing development?**

21. Whilst the our client notes that the 400 units proposed in Menston over the plan period exceeds that which is based on demographic changes over the plan period, this is largely based on existing planning permissions and the addition of other sites within the settlement boundary.
22. The strategy relies heavily on the delivery of two large sites in particular; Bingley Road and Derry Hill which between then would yield over 300 units. Whilst these sites have support in the 2013 SHLAA (EB/049), the delivery of these developments is currently far from certain with the site at Derry Hill potentially the subject of a judicial review and a planning application at Bingley Road recently being refused.
23. This uncertainty highlights that in order to provide the required homes that the Council need to look at other larger sites capable of accommodating this development (such as our client's land at SHLAA reference: ME/005 and ME/006 (in part)) and where necessary seek to review Green Belt boundaries to allow this to happen. By solely concentrating on sites within the development boundary (which outside of Bingley Road and Derry Hill are limited in their capacity) and relying on two larger the sites, there is an increased risk that the settlement does not meet its requirements and is left with a policy which does not provide a framework to allow alternative sites to emerge. As such it can be argued that the policy is not positively prepared or consistent with National Planning Policy which in paragraph 52 states:

**“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns.”**

24. Indeed to take this further and as outlined in the Inspector's question, it is arguable that the settlement can and should in any event accommodate further housing over and above the 400 units currently proposed and should thus be promoted in the settlement hierarchy to a Local Growth Centre. The settlement is highly sustainable with good linkages to neighbouring

settlements including Bradford and Leeds. It also lies in a strong market area where it is more viable to develop housing and so is capable of more readily contributing to the Council's overall housing target.

25. In light of these observations above we believe to ensure that the approach to delivering housing in Menston is sound, additional sites needs to be considered and this will necessitate a review of the Green Belt boundaries. Such a review needs to be part of a comprehensive assessment of the Green Belt which should be undertaken as part of the Core Strategy (rather than Allocations DPD) so as to provide greater certainty for future development in Menston.

### **Economic Development**

#### **a) Is there sufficient justification and evidence to support the roles of Ilkley, Burley-in-Wharfedale, Addingham and Menston in economic terms?**

26. Our client does not have any specific comments relating to this topic. We however reserve the right to comment on this area further in relation to our client's site interests.

### **Environment**

27. Our client generally notes the measures outlined in part D of Policy WD1 and believe these should provide certainty to the Council that developments can emerge without a detrimental impact on the SPA/SAC and other ecological features in the area.

### **Transport**

28. Our client does not have any specific comments relating to this topic. We however reserve the right to comment on this area further in relation to our client's site interests.

### **Outcomes**

29. Whilst the Outcomes contained in paragraphs 4.3.1 to 4.3.4 of the Core Strategy are useful to illustrate how the Council envisages Wharfedale to be in 2030, in isolation these are of little use. Instead the Council need to explicitly show how the Policy WD1 is going to work in reality especially in the sense of bringing sites forward, reviewing Green Belt boundaries and ensuring housing can be delivered.