

MATTER 6C –SUB AREA POLICIES WHARFEDALE

INTRODUCTION:- Our further representations are focussed on the Inspector's questions for this matter and EIP session. They need to be read and considered in conjunction with our main submission statement produced in March 2014; the Wharfedale Local Area –Housing Market Signals Analysis produced by NLP (March 2014)- this report was produced on behalf of developer and house builder clients represented by NLP and Johnson Brook and we liaised with NLP on the production of this report and submissions by NLP and Johnson Brook on the housing need and requirement.

We represent developer and landowner interests in Menston, Ilkley and Addingham and we have considerable background knowledge of the Wharfedale area, its past performance as a housing sub market, infrastructure requirements and environmental and socio economic characteristics. We are currently engaged in the production of an Area Plan for Ilkley which was commenced some two years ago prior to the Parish Council receiving the required authorisation to produce a neighbourhood plan in November 2013. We have recently had a meeting with the Neighbourhood Plan Steering Group and have reached initial agreement on a level of co-operative working, including a joint public exhibition to be held in the town in approximately 4 to 6 weeks' time. The Area Plan work was initially commissioned by Redrow Homes but we anticipate that other developers/house builders will engage in this process. The extent of future co-operation with the Neighbourhood Plan Steering Group will be the subject of further discussions but our aim is to achieve agreement on a wide range of matters which will lead to the production of the advanced draft versions of the Neighbourhood Plan. We are also liaising closely with CEG and their consultants NLP and Baker Associates on the development industry's response to the HRA and strategic policy SC8.

6.10 STRATEGIC PATTERN OF DEVELOPMENT

QN a) We conclude from all the work we have carried out and that produced by NLP on the overall housing requirement and the Wharfedale sub market area, as well as an interrogation of all relevant evidence base documents, including the Growth Study and the Sustainability Appraisal, that higher levels of growth previously contained in the Further Engagement Draft version of the CS can and should be achieved in the Wharfedale sub area. The delivery of 2,700 to 3,100 dwellings in the sub area within the plan period is achievable on identified sites which are in our opinion suitable, available and deliverable. The actual master-planned quantum of development has been reviewed for some but not all sites. The additional reserve land requirement following a comprehensive Green Belt review is likely to be achieved by a mix of additional housing on sites allocated in the plan period and separate reserve land sites.

We fully support the future role of Ilkley as the Principal town serving Wharfedale. In our previous submissions we had not specifically opposed the downgrading of Menston and Burley from their previous local growth centre status. At that time (March 2014) we were not aware of the HRA in its latest form and the way in which the late introduction of policy SC8 into the strategic policy mix in the Publication Draft was being used by the Council as the single prime reason for reducing their status and the lower quantum of development proposed to be distributed to these two settlements. This has very recently come into stark focus with

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the refusal this month of planning permission for a phase 2 housing allocation in Menston. The GVA/Edge Analytics report on housing need has been used as a secondary argument for a downward adjustment of Wharfedale figures and in other matter statements we have provided evidence on why we consider the reduced requirement is not justified. As we conclude that the SC8 policy is unsound on several grounds we also conclude that Ilkley, as a principal town with many strengths, and the re-instated Local Growth Villages of Menston and Burley can and should accommodate higher housing numbers than those contained in our March 2014 distribution table. Addingham can and should accommodate circa 275 dwellings plus a reserve land component. Menston and Burley have strong sustainable growth characteristics which have far more in common with the retained Local Growth villages than the lower tier of Local Service Centres. The Wharfedale electrified rail service is a key component of supporting infrastructure.

QN 6.10 b):- The higher numbers distributed to Wharfedale and its constituent settlements in the pre SC8 scenario are justified and consistent with national policy as well as forming a very important delivery fit with the growth policy for Bradford, LCR and the Combined Authority. They are also consistent with the Government's recently stated economic policy for Yorkshire and the Humber (see Matter 2 statement). This policy element for Wharfedale with its introduced restraint policy based only on the HRA questionable evidence base is not positively prepared and soundly based nor is it consistent with national policy. The retrofitted and precautionary approach of policy SC8, if implemented, will have a major regressive impact on the deliverable and justified Wharfedale vision and objectives and the level of growth this clearly implies. The NLP sub market assessment presents a strong market evidence base for meeting the specific housing needs and the demand in this sub area both in terms of market and affordable housing. This should be supported by the re-instatement of the 10 hectares of employment land supply growth which is fully justified by the evidence base and the needs of the market. Limited development has taken place in Wharfedale in recent years and entry into the market is constrained by high relative house prices and lack of affordable provision. The backlog of housing provision is also particularly apparent in this area.

6.11 NEW DEVELOPMENT LOCATIONS

a) ILKLEY:- Our work to date on the Ilkley Area Plan has examined constraints and opportunities and core infrastructure needs and we conclude that there is limited scope for redevelopment and new build within the urban area and a need for well-planned Green Belt releases at the eastern and western edges of the town. Primary and secondary constraint mapping makes it clear that these eastern and western expansion areas towards, but not on, the valley floor are the only relatively sustainable options for growth. We have been involved in master planning exercises at both ends of the town to further examine transport, landscape, flood risk and other issues and to broadly establish the capacity of the most likely Green Belt releases. While there is more detailed work to be carried out in concert with the Neighbourhood Plan Steering Group we have completed sufficient analysis to confirm broad development capacities of all SHLAA sites and the preferred eastern and western expansion areas. This leads to a conclusion that a marriage can be achieved between accommodating

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the full development needs alongside support for some of the infrastructure provision required and creating environmental enhancements by applying a positive approach to greenspace and habitat network provision/creation. The overall emerging strategy is to create two 'bookend' parkland areas to the east and west of the town connected by new/enhanced cycle and footpath networks.

Without a certain level of residential development adequate funding contributions will not be achieved to support essential infrastructure provision. A very good example of this is the early requirement for a larger replacement for Ilkley Grammar School on land selected as the preferred site to the east of Ben Rhydding. It is proposed to co-locate and design this with a business park which would meet more than 50% of the 10 ha employment land requirement. The 2000 place new Academy is an increase of 500 pupil places compared with the current school and this serves a catchment from Addingham to Menston.

While we agree that there are opportunities for some redevelopment and new build sites within the urban area we estimate that these will accommodate between 300 and 400 dwellings. Included in this total is the existing Grammar School site with a planned capacity of 120 dwellings and a component of housing in a mixed use scheme on the approved new Tesco superstore site where retail development is no longer being progressed. A considerable amount of garden and other development has occurred in the last 25 years and this fact plus the extent of heritage features does have a limiting effect on the sustainable capacity of future development within the town.

We have made a broad comparison of our constraints and Green Belt boundary analysis with that used by Broadway Malayan in their Growth study. They have argued that the habitat protection zone beyond 400 metres and up to 2.5 kms from the SPA is a medium constraint and by including this extensive area with all other primary, secondary and tertiary constraints in and up to 500m from the urban boundary of Ilkley the end result is that there is no unconstrained land around the town. We totally disagree with the need to apply the 400m to 2.5 kms zones as a constraint as it is not justified by evidence and is a precautionary approach rather than a positive planned approach. If this constraint were removed there would be a total of at least 350 hectares of land within the 500m extension zone from the urban area. Due to the fact that potential urban extensions to the east of Ilkley are likely to extend beyond the arbitrary 500m limit this arguably adds further unconstrained land into the areas for active consideration.

We conclude that the current proposals for Ilkley do not meet the tests stated at the end of question 6.11 a.

6.11b **ADDINGHAM**

From our earlier work on Addingham and a subsequent review we conclude that there is more than sufficient land in sustainable Green Belt releases, some of which are small in scale, and small developments within the urban area to meet a distributed housing requirement of 275 dwellings. This level of housing growth can be supported by the services which already exist and in turn this level of development will add further support for the retention and in some

cases the expansion of those services. Green Belt releases proposed in Addingham do not adversely impact on 4 of the 5 main functions and purposes of Green Belt designation. The only argument which can be applied is the retention of open countryside. A positive planned approach will ensure retention of key sectors of open countryside which are important to the setting and character of the village.

6.11 d **MENSTON**

While both of the 2005 phase 2 allocation sites in Menston have achieved planning permissions both have been subject to strong local opposition resulting in various challenges and recently culminating in a High Court challenge on the Derry Hill allocation on a detailed drainage/flood risk issue and a refusal of the Bingley Road site at full application stage on two grounds comprising drainage/flood risk and habitat impact. A considerable proportion of these dwellings would have been built by now had various challenges on these and other issues not been made (e.g village green inquiry at Derry Hill). There is insufficient evidence for restricting growth in Menston to a level which is contained within the village perimeter plus existing permissions. A higher reasonable level of development is capable of being sustainably accommodated with limited further Green Belt releases.

6.12 **ECONOMIC DEVELOPMENT**

There is a full raft of evidence to support growth of the economic role of Ilkley and the policy as worded underplays the business development potential of the town. We advocate the provision of at least 10 hectares of employment land in Wharfedale with at least 8 hectares being provided within Ilkley of which 6 to 7 hectares should be in the form of a new business park, co-located with the new secondary school, to the east of Ilkley on land removed from the Green Belt and accessed from the A65 via a new road junction. This will provide for a sustainable outcome of locating jobs near to homes and will have a positive impact on reducing medium distance commuting journeys. Office development within the town centre is likely to be small in scale given the conservation, environmental, site availability and scale constraints.

The reasons for providing for the positive economic development of the town in business employment terms can be summarised as follows and are referenced in our responses to other matters including matter 2 –the Vision and Objectives and matter 5- Economy and Jobs.:-

- The overall LCR growth strategy and the infrastructure funding to support growth including IT. The important growth role of Bradford within the LCR and the under exploited assets of Ilkley and Wharfedale as a business node.
- We are aware of existing businesses who are expanding especially in IT and engineering and entrepreneurs living in Ilkley who wish to establish businesses locally.
- The quality of the existing and expanded housing provision, communication links and the general living environment are further incentives to grow businesses locally.

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- It is proposed to establish a business skills hub linking the new Academy and the business park leading to training, potential apprenticeships and the creation of a local pool of skilled labour.

We propose in Matter 5 an expansion of the primary shopping area of Ilkley as there are known retailers wishing to establish business units in the town.

Consequently there is more than sufficient justification for a controlled expansion of Ilkley's economic role and this is an important contribution to the overall delivery of the Strategy and its vision.

6.13 ENVIRONMENT

We conclude that there is sufficient evidence to support improvements to the environment alongside and integrated with the delivery of development proposals. Such proposals to the east and west of the town will help to integrate well designed and master planned new development into the urban context. Outline master plans have already been prepared on behalf of our clients to the east and west of the town.

We have already argued in relation to matter 2 and to policy SC8 in matter 3 that there is a considerable scope for environmental improvements including habitat enhancements, provision of new habitat and improvements to existing habitat through better management and other interventions. We argue that this positive approach will secure far more combined benefits than the precautionary approach to supporting SPA habitat now being proposed by the Council and their consultants.

There is sufficient evidence and justification to support the environmental interests in the Rombalds Ridge area so that its contributions towards the setting of the town and the ecological and archaeological interest and significance are maintained.

We have already argued that a positive approach to landscape and biodiversity enhancement along with better management of recreation assets and habitats, particularly within the SPA, together with the provision of new recreation areas outside the SPA will help to protect and enhance the integrity and mosaic of moorland habitats.

The Wharfe Valley green infrastructure corridor is already a major feature of the town. This can be protected and enhanced via the creation of two new parkland areas at the eastern and western ends of the town. These will be integrated into a new and strengthened greenspace network with new footpath links creating circuit routes. These parkland areas will be delivered as part of the proposed residential and infrastructure developments being planned as part of the controlled expansion of the town.

The protection and enhanced use of heritage assets will form part of the Neighbourhood Plan preparation. The Parish Council have already applied to secure key buildings as community assets. The community are working with the Church on a large project to ensure the best future use of a core group of heritage buildings set within the scheduled ancient monument of the former Roman fort of Olicana.

6.14 **TRANSPORT**

Transport consultants are currently working on surveys for the Ilkley Area Plan together with the production of initiatives aimed at enhancing modal transfer and reducing the number and length of car trips. We intend to produce an area wide travel plan as part of this work. Accession modelling has been completed which demonstrates walking and cycling accessibility and access to public transport. Examination of capacity of the A65 and its junctions within and approaching the town together with the ability to improve the signal control systems to aid flows are underway.