



Bradford Local Plan Core Strategy Examination - Hearing Statement

Representations on behalf of CEG Land Promotions Ltd (CEG)

Representor Reference: 495
Date: February 2015

Matter 6C: Sub-Area Policies – Wharfedale

Key issue:

Does the Plan set out a clear, effective and soundly based framework for the Sub-Areas of Bradford, Airedale, Wharfedale and the South Pennine Towns and Villages, which is appropriate for the area, effective, positively prepared, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

Question 6.10: 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?

and

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

- 1.1 There is no evidence, which holds up to detailed scrutiny, to justify the Council's constrained level of housing distribution for the Wharfedale settlements. This has been addressed in detail in CEG's representation in respect of both Matter 1 (Legal and Procedural Requirements) and Matter 4d (Housing Requirements).
- 1.2 This demonstrates that the proposed distribution cannot be considered sound as: it is not positively prepared and is principally based upon a flawed approach of artificially restricting housing numbers in Wharfedale to protect the integrity of the South Pennine Moors and the 2.5km buffer zone, where the approach to the SPA and any such protection is misconceived and legally non-compliant.
- 1.3 In the absence of any justification to restrict housing numbers by way of purported protection of the South Pennine Moors in this way, CEG's statement in respect of Matter 4C also demonstrates that there is a clear requirement to increase the distribution to sustainable locations such as Burley-in-Wharfedale. This is necessary in order to plan positively for the needs of the area in

accordance with the guidance contained in the Framework (paragraph 182), and to ensure that the full objectively assessed needs of the District can be delivered. Prior to the artificial constraints imposed by the conclusions of the HRA, Burley was correctly acknowledged within the earlier draft of the Core Strategy as a Local Growth Centre accommodating a greater proportion of housing. This was based upon the evidence contained in the Council's Draft Settlement Study. The amended policies proposed by CEG for the CS will ensure protection of the SPA, whilst still allowing for this sustainable growth.

- 1.4 CEG's position (as explained in detail in the Matter 4C statement), is that Burley's appropriate location in the settlement hierarchy is as a Local Growth Centre. This takes into account the fact that it is a sustainable and viable location. Given the need to redistribute housing taking account of a realistic and deliverable approach to the Regional City. Burley-in-Wharfedale should be identified by Policy WD1 as accommodating at least 500-700 units.

Question 6.11: New Development Locations:

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/PPG)? Could this settlement take more housing development?

- 1.5 An assessment of Burley-in-Wharfedale is contained at Appendix 1 of CEG's statement in respect of Matter 3.2 (Policy SC4 – Settlement Hierarchy). This demonstrates that it is a highly sustainable settlement, with excellent transport links and local services. It is a location that is capable of viably accommodating new market and affordable housing. It should be identified as a Local Growth Centre in the Settlement Hierarchy, as was the case in the earlier CSFED.
- 1.6 The justification for the need to release land from the Green Belt to meet the housing requirements in Burley-in-Wharfedale is established by the results of the 2013 SHLAA. This demonstrates that, due to the tight boundaries imposed by the current Green Belt and the absence of any sites within the settlement boundary, beyond a limited number of very small scale sites, most of the identified supply is on land presently identified as Green Belt. Indeed the total yield of non-Green Belt sites identified within the SHLAA amounts to just 77 dwellings, meaning that Green Belt land is inevitably required, even if one were only to accommodate the 200 dwellings as presently proposed by Policy WD1 (and HO3).
- 1.7 The supply of SHLAA sites in Burley on land presently identified as Green Belt is, however, much greater, amounting to 1,019 dwellings, a figure which increases to 1,027 when a yield of 500 is applied to SHLAA site BU/001. This,

along with the land immediately to the west, is in the control of CEG. An indicative master plan of the CEG site, demonstrating how 500 units can be accommodated with appropriate infrastructure, alongside community and commercial uses, can readily be found within the Burley-in-Wharfedale Vision Document contained at Appendix 4 of CEG's representations to the consultation into the CSPD.

- 1.8 Importantly, the Green Belt boundary around Burley is also capable of being amended in a way which would not prejudice the purposes and strategic function of Green Belt, as set out in paragraph 80 of the Framework and referenced within draft Policy SC7. The Council's Growth Assessment (EB/037) concludes that the Green Belt around Burley does not serve a wider strategic purpose; whilst it is proposed that such a review will form part of the later Site Allocations Plan, the removal of the CEG site to the west of the settlement from the Green Belt would not compromise any other purpose. The removal of this land from the Green Belt as well as its development for housing and supporting uses provides the opportunity for a more logical and defensible Green Belt boundary which will contain the extent of Burley-in-Wharfedale in the future, through the creation of a landscape buffer between the development and the open fields beyond.
- 1.9 Importantly such a revised western boundary would still maintain a significant gap between the built up areas of Burley and Ilkley and would not lead to the coalescence of these neighbouring settlements. By extending the village westwards, it would ensure that there would be no coalescence with Menston to the south east. A plan showing how the CEG site could be accommodated without risk of coalescence is contained at Appendix 1 of this Matter 6C statement.
- 1.10 The Local Infrastructure Plan Update (EB/044) in considering Wharfedale identifies medium term capacity issues in local primary school provision as being a challenge to accommodating additional housing growth in the area. CEG's master plan for its site in Burley (see Vision Document as referred to above) indicates how the identified primary school capacity issues, along with the additional requirements that would be generated by a higher housing distribution advocated by CEG, would be accommodated through the provision of a new primary school on their site. The implications of a smaller amount of housing in Burley as proposed by the Council, would not provide the critical mass to allow for such infrastructure to be delivered, thereby exacerbating existing capacity issues.
- 1.11 The master plan of the CEG site also demonstrates how it could accommodate further local community infrastructure (as required by the wording of Policy WD1 – Part B), including areas of open space, play areas and potential commercial uses.

- 1.12 With regard to secondary school capacity, it is noted there are longstanding proposals to facilitate a new/larger secondary school in Ilkley, which would serve all of the Wharfedale settlements. This is recognised within Part B of WD1 and is supported. Indeed, subject to the appropriate mechanisms being put in place, a higher level of housing development in Wharfedale could assist with the delivery of such a school.
- 1.13 In terms of rail capacity, the Wharfedale Line has seen significant investment over the last few years, including its electrification in 1994/1995 and the provision of additional services and rolling stock. The Transport Secretary, Patrick McLoughlin, confirmed in May 2014¹ that the Government remains committed to investing in the railway network, including the spending of £38.5 billion by Northern Rail who operate the Wharfedale Line.
- 1.14 It is understood that future improvements are currently being planned as part of Network Rail's "Control Period 5 (2014-2019)" delivery plan. Whilst the exact nature of these improvements has yet to be confirmed, potential solutions could include longer trains (which would require longer platforms), more services per day or upgrades to signal equipment etc. to reduce service headway. A number of recent planning applications have also demonstrated that where new development has had the potential to increase demand for rail services, Metro – the West Yorkshire Passenger Transport Executive – has dealt with this positively by accepting developer contributions intended to help improve rail capacity.
- 1.15 In response to the final element of the Inspector's question, in relation to whether Burley-in-Wharfedale could accommodate more housing development, for the reasons set out above and throughout CEG's other hearing statements, the answer is a resounding yes.

Question 6.12: Economic Development:

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

- 1.16 As sustainable and viable locations to accommodate future growth, CEG consider that there is clear justification to support the economic development proposals of Policy WD1. Such development will be important to support the level of housing that the settlements are capable of accommodating (as advocated by our submission to Matter 4C).
- 1.17 It is further considered that reference to the support for commercial development (in addition to the existing reference to retail and leisure development) should also be recognised within Part C.3 of Policy WD1, in

¹ <http://www.publications.parliament.uk/pa/cm201314/cmhansrd/cm140508/debtext/140508-0001.htm>

recognition of the sustainable nature of these locations and the excellent transport links that they enjoy.

Question 6.13: Environment:

a) Is there sufficient justification and evidence to support the proposals to improve the environment, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

1.18 CEG support the general aims of the environmental section of Policy WD1. It is, however, important to acknowledge that the integrity of the SPA/SAC referred to in D.2 can be achieved without the need to restrict housing growth in this area.

Question 6.14: Transport:

a) Is there sufficient justification and evidence to support the transport proposals, including transport improvements and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

1.19 The Transport section of WD1 is generally supported by CEG. The ability to facilitate further sustainable transport improvements (E.2) can best be facilitated through additional housing development in these settlements.

Question 6.15: Outcomes:

a) Is there a reasonable or realistic prospect of the Outcomes set out in the Plan? (¶ 4.3.1-4.3.4) actually being delivered by the end of the Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?

1.20 The outcomes anticipated at paragraphs 4.3.2-4.3.4 are capable of being delivered during the plan period. Indeed, it is considered that they should be more ambitious to reflect the additional growth that we advocate for Wharfedale and specifically Burley-in-Wharfedale. In these terms, para 4.3.3 should reflect that Burley-in-Wharfedale would be the beneficiary of sustainable growth in housing and community facilities with enhance economic prosperity resulting from housing development having taken place commensurate with the settlement's designation as a Local Growth Centre.