

Bradford District Local Plan

Core Strategy Examination Session Day Seven

Matter 6C: SUB AREA POLICIES - Wharfedale

Date: 17th March 2015

Venue: Victoria Hall, Saltaire

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

Response

- 1.1 Policy WD1 pulls together the key elements of the development strategy for the respective sub area. This covers the following settlements:
 - Ilkley
 - Addingham
 - Burley In Wharfedale
 - Menston
- 1.2 The detailed approach to the scale and distribution of housing and economic development are dealt with under the relevant policies namely HO1 – HO3 and EC1 – EC4 and supporting text.
- 1.3 The individual settlement targets, including those for the settlements within Wharfedale, have been influenced by a variety of factors and criteria ranging from very strategic ones such as the Plan's Strategic Core Policies, in particular the Settlement Hierarchy, to more specific local factors such as land supply and environmental constraints.
- 1.4 Even though the final targets are relatively detailed and are settlement specific, the process of deriving those targets has to start off with some strategic building blocks – policy assumptions and goals. The two core strategic building blocks have been the evidence on the drivers of population and household growth which result in the need for new homes and the hierarchy of settlements within the district. The former, the drivers of housing need, as revealed within both the Strategic Housing Market Assessment (SHMA) (EB050 & EB052) and the Housing Requirement Study (EB028) are the expected natural increase (births minus deaths) in the district's population driven by a relatively young age profile and continued international migration. Clearly the main urban areas of the district of Bradford and Keighley exhibit the youngest age structures and have had historic and established patterns of international migration from both commonwealth countries and more recently the EU. This means that there is a strong argument for the overall housing distribution to be focused on the urban areas in particular the Regional City. This also then leads to a comparatively lower level of housing growth being proposed for other settlements including some of those within the Wharfedale sub area. The precise degree of concentration and focus of housing growth may be a matter of debate but the need for an urban focus is hopefully beyond reasonable argument.
- 1.5 The second strategic building block for deriving a housing distribution is the settlement hierarchy. The Council's proposed settlement hierarchy is set out in Policy SC4. This again is a key factor since the settlement hierarchy has

been determined by reference to the size, role and function of each settlement and the range, and balance of services both within that settlement and accessible to that settlement. Settlements with good transport links, particularly good public transport links feature in higher tiers of that hierarchy. Thus any broad approach to housing distribution which has strong regard to the settlement hierarchy is already pre-disposed to being a sustainable option because the development which does occur will be focused in sustainable locations. Within Wharfedale the settlement hierarchy approach therefore suggests that higher housing targets should be located in the Principal Town of Ilkley and successively lower targets for the next two tiers – in Wharfedale's case there are no settlements within tier 3 so all remaining settlements are within tier 4 – Local Service Centres.

- 1.6 Therefore at each stage of the preparation of the Core Strategy the Council has attempted to put forward a distribution which follows the strategic principles of a focus on the urban areas and the use of the settlement hierarchy. This has in turn affected the content of the sub area policies.
- 1.7 The precise targets and the levels of development however also have to reflect – and have reflected – a variety of other evidence. Firstly the distribution also has to reflect the available land supply as indicated in the Strategic Housing Land Availability Assessment (SHLAA) (EB049). The SHLAA provides useful guide to the approximate upper limits to potential housing targets (if no other factors needed to be assessed) as it has analysed the extent of deliverable and developable land supply on a settlement by settlement basis. However this is not enough on its own. The nature of that land supply has to be assessed and here again the SHLAA is useful as it provides an indication of the split between green field and previously developed land, between in settlement and edge of settlement options, and the extent of green belt change, if any, which may be required within each settlement. The SHLAA therefore provides both absolute evidence of whether certain targets are deliverable, and an indication of where spare capacity might exist if alternative distribution quantum were put forward and also illuminates the environmental implications of a given approach.
- 1.8 Secondly the distribution has also been assessed against information on a range of environmental constraints. The Council's approach within Policies WD1 and Policy HO3 therefore reflects:
 - The results of a district wide Growth Assessment (EB037) which has confirmed that it will be possible to deliver and manage change to the district's green belt boundaries in a way which still maintain a robust green belt at local and strategic level and which still promotes development in sustainable locations. In many ways this reflects the fact that the district's green belt boundaries have been drawn very tightly into the edges of existing settlements meaning that there are many green belt locations which are relatively accessible to local services and transport routes;
 - The results of a Strategic Flood Risk Assessment (EB048) and more specifically a sequential flood risk assessment. The latter has shown that in the vast majority of settlements the proposed housing targets can be met entirely within the lowest flood risk zone.
 - The results of a Habitats Regulations Assessment (HRA) (SD022) - here the impacts of the analysis have been felt more acutely in some of the

Principal Towns and lower order settlements – settlements where potential sites are located within 2.5km of the designated South Pennines Special Protection Area (SPA) and Special Area of Conservation (SAC) and where based on the analysis of the HRA the Council are advocating a precautionary approach to ensure that the loss or degradation of areas outside of the designated sites but yet important to those sites (for example by providing foraging resources) is minimised. The HRA has had a significant effect on the proposed settlement targets within Wharfedale which are somewhat lower than would otherwise have been the case.

1.9 Thirdly the distribution has taken account of other contextual evidence including:

- Transport and infrastructure – it has been clear from the outset that the level and scale of development required to meet future need will provide challenges and will require significant intervention and investment. While objectors concerns naturally reflect the perceived situation of services and infrastructure in their own areas, services and infrastructure are stretched and in some places at and beyond capacity in many areas across the district. The Council has produced a Local Infrastructure Plan (EB044), liaised with infrastructure providers and considers that the Core Strategy rather than creating infrastructure problems, will actually provide the basis to begin to tackle the forthcoming issues by giving certainty to service providers and utility providers of the future level of growth so that they can develop their short and medium term investment plans;
- The need for the distribution to reflect the priority for regeneration and the Council's key focus on areas such as the City Centre, the Canal Road Corridor and the Airedale Corridor (in particular the settlements of Keighley, Bingley and Shipley);
- The need for the distribution to provide homes in lower tier settlements to support local need, maintain their vitality, support local services and therefore community cohesion, and provide affordable housing;
- The need for the distribution to reflect deliverability and viability issues; on a site by site basis the Council's SHLAA has assessed whether there are any site related deliverability constraints such as land ownership, access issues, steep slopes and so on. It has also sought the views of the SHLAA Working Group on how general market conditions in each area might affect the likelihood and the timing of delivery; the Plan has also been informed by a full local plan Viability Assessment (EB046).

1.10 It should be stressed that the interplay between strategic factors and more detailed environmental and land supply factors is different in each settlement. So for example the need to reflect the 2.5km SPA buffer zone affects some settlements and not others, land supply is more of a constraint in some settlements than others, flood risk is more of a constraint in some areas than others and so on. The Council's Housing Background Paper 2 (SD016) has therefore indicated the key factors which have affected the final housing target and also benchmarked that target against a baseline distribution which reflects only the size of the population within that settlement.

- 1.11 The distribution set out within Policy WD1 is therefore aligned both to the evidence and to other key strategic policies within the plan, in particular SC4 and SC5 which define the settlement hierarchy and broad approach for managing growth.
- 1.12 In line with SC4 the distribution recognises the role of the principal Town of Ilkley in terms of existing development, population and services.
- 1.13 Policy EC3 and related Background paper 3 (SD018) set out the basis for the proposed new employment land distribution including the proposed new 5 Hectares proposed for Wharfedale.
- 1.14 The policy is considered effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance. In line with NPPF paragraph 156 the approach seeks to set out a clear strategy for the delivery of development in particular homes and jobs, and in line with Paragraph 157 indicate where development would be appropriate.

Issue 6.11

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/PPG)?**
- 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/PPG)?**
- 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?**
- 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?

Response

- 2.1 The justification and evidence in support of the housing distribution is set out under Policy HO3, the Council's position statement in relation to Policy HO3 and in Background Paper 2 (SD016).
- 2.2 The housing quantum proposed for the different settlements reflects their position within the settlement hierarchy, reflects the evidence of potential land supply in the Council's SHLAA and also reflects a range of environmental constraints and considerations. Ilkley is a key settlement and a Principal Town within the Wharfedale sub area and therefore it is suggested that it accommodates the largest level of housing growth accordingly. While it is a sustainable location for growth there are also other imperatives such as the need to avoid areas of higher flood risk, the need to respect its setting and character and the need to reflect its proximity to the South Pennines SAC / SPA that have resulted in a lower proposed housing target than would otherwise have been the case.
- 2.3 Within the Wharfedale sub area the remaining 3 settlements are designated in the fourth tier of the settlement hierarchy and therefore are expected to accommodate lower levels of growth. Even here there are differences between the settlements with Burley in Wharfedale and Menston having relatively better accessibility to road and public transport links.
- 2.4 Evidence from both the SHLAA Update of 2013 and the provisional data from the third SHLAA indicate that the proposed housing targets are deliverable in each case. Indeed there is a substantial excess of potential supply in all of these settlements albeit the majority of that land is within the green belt.
- 2.5 Based on the findings of the SHLAA minor green belt changes would be required to deliver the proposed targets in Burley in Wharfedale and more substantial changes around Ilkley. At the levels proposed it is not anticipated that green belt change would be required at Addingham or Menston.
- 2.6 In terms of existing role, facilities and infrastructure as well as planned infrastructure the policy has been informed by the following key pieces of evidence:
 - Settlement study (EB040 – EB42)
 - Growth Study (EBO37)
 - Local Infrastructure Plan (EB044)

- 2.7 The policy includes reference to key infrastructure improvements as informed by the LIP but this is not exhaustive.
- 2.8 The policy is clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance.

Issue 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?**

Response

- 3.1 The justification and evidence in support of economic development is set out under Policies EC1 – EC4 and associated background paper 3 (SD018). Further detailed information was used to inform the approach is contained in the following:
- Bradford District Employment Land Review and Update (EB027)
 - Local Economic Assessment (PS/B001b xiv)
 - Settlement Study (EB040 – EB043)
- 3.2 The economic focus of Ilkley reflects its status as Principal Towns as set out under Policy SC4 and related employment policies including SC1- SC5. The Retail and Leisure Study has informed the approach to the centres of Ilkley, Burley in Wharfedale, Menston and Addingham. The policy also recognises the rural nature of wharfedale and the need to support rural diversification in line with NPPF.

Issue 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)?**

Response

- 4.1 The proposals are linked to regional work and data relating to green infrastructure, heritage related data, ecological network mapping, landscape character assessment, sustainability appraisal and future work in local plans and neighbourhood plans. Implementation will however be dependent on council priorities. The approach is considered to be broadly consistent with national guidance.

Issue 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)?**

Response

- 5.1 The council believes that the transport proposals and policy elements contained in the Wharfedale sub area policies are effective, deliverable, justified with evidence, soundly based and consistent with the latest national guidance. The measures proposed are consistent with standard transport planning practice and reflect and were developed in the context of existing local and national transport policy, strategy and programmes. These include 'My Journey' the West Yorkshire Local Transport Plan, (to be referred to as the LTP) the West Yorkshire Plus Transport Fund (WY+TF) and the Leeds City Region Strategic Economic Plan (PS/B001b xv) and NPPF. The policies were deemed to be viable within the Bradford District Local Plan Core Strategy – Viability Assessment. (EB046).
- 5.2 The policies also reflect and support those policies in the Transport and Movement section of the Local Plan.
- 5.3 Policy WD1 E1 is consistent with NPPF which in paragraph 30 states that "local planning authorities should support a pattern of development, which where reasonable to do so, facilitates the use of sustainable modes of travel" Policy WD1 E1 states that that "development should be located to reduce the need to travel and maximise sustainable travel". This will be achieved through the application of the Accessibility Standards in Appendix 3.
- 5.4 The public transport, walking, cycling and demand management proposals contained in the policies are consistent with NPPF, Section 30 of which states 'Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.'
- 5.5 Although it is recognised that developing sustainable transport solutions can be challenging in more rural areas, increasing the concentration of development at focal points in such areas can act as a catalyst for the provision of new and innovative forms of public transport. All of the towns and sizeable villages in the sub area have existing bus services and these will be more likely to be sustained if passenger numbers increase due to new residents and commercial activity.

Issue 6.15

Outcomes:

- e. **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?**

Response

- 6.1 Paragraphs to 4.3.1 to 4.3. 4 set out the high level outcomes in support of the policy and delivery of the spatial vision and sub area policy. They will be delivered by the policy requirements of the sub area policy and wider policies of the Core Strategy as well as supporting non planning interventions through other actions of the Council and partners. The Outcomes while aspirational are realistic and are informed by the key evidence supporting the Core Strategy.
- 6.2 The key performance framework within the Core Strategy as outlined in Section 7 will be used to monitor the policies of the Local Plan. These will be published in the Annual Monitoring Report. The outcomes also link to other monitoring linked to the Community Strategy and State of the District work undertaken by the Council. Individual regeneration areas have their own monitoring systems and report to the Councils Executive at appropriate period on progress.