

Yorkshire Greenspace Alliance, 17th March 2015

The Council's Suggested Changes to Settlement Hierarchy:

An overview of how this might affect other policies in the Core Strategy

Introduction

In our joint letter to the Inspector, submitted with a number of representatives from the Wharfedale community, we voiced a shared concern that the proposal to move Menston and Burley up the settlement hierarchy to Local Growth Centres, and associated changes to the the housing distribution, would potentially impact on a wide range of policies in the draft Core Strategy. This document seeks to explore - non-exhaustively - which aspects of the draft CS might be affected, and what the impacts might be. We have sought to do this as objectively as possible, though obviously a partisan starting point is unavoidable. To assist the objectivity we pose questions rather than seeking to answer them.

The proposed change itself may have a series of outcomes that may not be consistent with the rest of the CS. Furthermore, it is possible that the application of Habitats Regulations Assessment as a key piece of evidence is weakened, and this may impact on its usefulness in structuring and justifying other policies. This document seeks to draw attention to both these types of impact.

Questions

Policy SC1 (parts 1, 5 & 6): How will a shift of development emphasis away from regeneration areas in urban Bradford?

Policy SC1 (parts 7 & 9): How do we ascertain whether the change will impact on other environmental considerations beyond the specific HRA matters?

Policy SC2 (A3): Does the change affect opportunities for the "...expansion, where appropriate, of vulnerable habitats"?

Policy SC2 (B3): Does the change help or hinder opportunities for "locating development to support green infrastructure"?

Policy SC3 (A9): How will any cross-boundary implications for landscape, environmental management and enhancement be assessed and applied?

Policy SC4: Local Growth Centres in the current policy lack a clause (found for Local Service Centres) to "achieve a high standard of design that protects and enhances settlement and landscape diversity and character" - does the change mean that developments in Menston and Burley will no longer be required to do this?

Policy SC5 (A): Does the change compromise the CS's overall ability to prioritise brownfield development? [Paras 5.3.57 to 5.3.58 suggest that the CS's ability to recycle PDL, and its need for Green Belt sites, would be unaffected by the different scenarios considered for housing supply in policies HO2 and HO3,

but this seems at odds with the SHLAA data; and, we assume, is only referring to scenarios within the settlement hierarchy as proposed; so it is unclear how this would be affected by changes to the settlement hierarchy].

Policy SC6 (B): Does the change help or hinder "opportunities to enhance the living landscape as a resource for people and wildlife"?

Policy SC6 (C): Does the change create the possibility of additional land coming forward for development, which "already contributes towards, or has the potential to contribute towards (1) retention, creation and enhancement of important habitats and ecological networks"?

Para 3.114: This states that "Urban edge moorlands are subject to a number of additional...urban edge effects". To what extent does this remain the case in the absence of specific protections for the SPA buffer zone?

Policy WD1: To what extent does having two additional Local Growth Centres in Wharfedale affect the sustainability both of that sub-area and of the overall District? If the amended distribution is nearer to the baseline population distribution, this implies a reduced degree of spatial intervention compared to a 'policy-off' situation: was the spatial intervention only to protect the SPA, or was it also seeking to implement other spatial outcomes, such as prioritising PDL?

Policy WD1(D): This policy has four clauses but only (2) refers directly to the SPA - to what extent does the proposed change impact on the effectiveness of the other clauses?

Policies HO2 and HO3: Refer to SC5 above.

Policy HO6(C): Does the change have the effect of reducing the PDL target?

Policy HO7: Does the change affect the allocation principles and, in turn, the potential of housing to deliver other spatial outcomes, eg (F1) and (F2)?

Policy HO11: If affordable housing in Wharfedale is more viable but less needed, how does the change affect delivery of this policy?

Policy EC1(B): What are the implications of the changes in terms of employment investment locations and associated land requirements and infrastructure?

Policy EC3(A): The supporting text for this policy implies a direct connection between settlement hierarchy and employment land distribution - if Menston and Burley were to be allocated additional sites, are there sustainable locations for them, and how does this affect the overall spatial distribution of employment land?

Policy EC5: Does the change affect Menston and Burley's position as 'local centres' (D) as opposed to 'district centres' (C) or 'town centres' (B)?

Policy TR1(A): How can the additional growth associated with the change achieve "minimal impact" on existing transport networks given the dependence on the congested A65 corridor and on over-capacity rail services?

Policy TR3(B): Can the change realistically support "the enhancement of public transport infrastructure" in the context of existing public transport infrastructure already being over-stretched?

Policy EN1(A): Are there open spaces that will need additional protection in policy because they were relying on the HRA for justification, but still need protecting anyway?

Policy EN1(C): Are there green infrastructure objectives in Wharfedale that are dependent on sites that may be subject to greater development pressure as a result of the proposed change?

Policy EN2(C1): Presumably the issue of "potential for adverse impact on important/priority habitats that occur outside designated sites" is not restricted to those affected by the HRA - If there are sites which were assumed to be protected via the HRA but still need protecting without it, is there sufficient evidence and policy strength to achieve that?

Policy EN4: How does the change to settlement hierarchy affect potential landscape impacts?

Policy EN6(B) confers visual impact considerations on the South Pennine Moors SAC/SPA: how have comparable visual impacts of housing and employment developments been considered, and how might the change affect that?

Policy EN7: Would the change affect the implementation of flood risk management?

Policy EN8(A): Would the additional development generating traffic on the A65 corridor create air quality management issues?

Andrew Wood, 17th March 2015