



Burley Parish Council

BRADFORD LOCAL PLAN CORE STRATEGY – EXAMINATION

PROPOSED MAIN MODIFICATIONS

Additional Comments from Burley Parish Council

MATTER 2 – Revised Settlement Hierarchy

Key issue: Is the proposed settlement hierarchy in terms of the amended status and role of Burley-in-Wharfedale and Menston appropriate, justified, effective, positively prepared soundly based and consistent with the latest national policy?

Objection by Burley Parish Council

Burley Parish Council objects to the designation of Burley-in-Wharfedale and Menston as Local Growth Centres. The designation is unsound because it is based purely on revisions to the HRA and pays no attention to the nature of the settlements or the principles of the Settlement Hierarchy

a. What is the basis and justification for the revised settlement hierarchy, and is it based on up-to-date and robust evidence?

Burley-in-Wharfedale and Menston were identified as Local Service Centres in the Core Strategy Publication Draft based on the Core Strategy Habitats Regulations Assessment which indicated the need to restrict the amount of housing development in the areas within 2.5km of the South Pennines SPA/SAC. Although the updated HRA (November 2015) does not rule out housing development within 2.5km of the South Pennines SPA/SAC per se, future development could be restricted by the need to meet the requirements of Policy SC8, as modified, which indicates that within Zone B (up to 2.5km from the SPA boundary), future land allocations and development proposals will be assessed for negative effects on foraging habitat for qualifying species of the SPA, based on such evidence as may be reasonably required by the Council.

In terms of land allocations within Zone B, further survey and assessment will be undertaken in order to test sites for inclusion within the Allocations DPD. Consequently, the revised settlement hierarchy is not based on up-to-date and robust evidence that significant growth can be accommodated, but defers this for consideration at a later stage i.e. through the land allocation process.

b. Does the revised settlement hierarchy reflect the existing and future status, role and function of the relevant settlements?

The Council indicates that the designation of a Local Growth Centre is dependent upon both its function and sustainability and its capacity to accommodate some growth. The Local Growth Centres were consulted upon and revised in light of up to date evidence as part of the plan preparation process and two settlements were 'downgraded' as part of the process in response to reductions in proposed scale of growth which would be appropriate in the settlement. Burley in Wharfedale was one of these settlements (Document PS/E003). This was based on the fact that the HRA indicated that capacity to accommodate growth would need to be restricted within 2.5km of the South Pennines SPA/SAC. The situation with regard to the need to ensure that new housing development does not have a negative impact on the SPA/SAC has not changed.

Although the HRA has been updated, it does not indicate that housing growth in Burley-in-Wharfedale will not have a significant effect on the integrity of the SPA/SAC but that the risk will be effectively managed through the implementation of Policy SC8 and through future survey work and testing of sites for inclusion in the Allocations DPD (paras. 7.2.4 and 7.2.5 of the Habitats Regulations Assessment for the Bradford District Core Strategy (Proposed Modifications), November 2015)

Bradford Council considers that the subsequent revisions to the HRA have removed the need to take a highly precautionary approach in limiting development within the 2.5km zone and have therefore reclassified Burley-in-Wharfedale and Menston as Local Growth Centres accordingly. However, it is not necessarily the case that the need for a precautionary approach to housing within 2.5km of the SPA/SAC has been removed, merely that a judgment will be made on a site by site basis through the preparation of the Allocations DPD.

Furthermore, there are other constraints to growth that are identified in the Bradford Growth Assessment which looked at policy constraints within a 500m search area of Burley-in-Wharfedale. The most significant of these is the risk of flooding to the east, north and south east of the settlement. There are also smaller pockets of flood risk to the north west and south east which do not abut the settlement boundary.

As it stands, therefore there is no justification for the inclusion of Burley-in-Wharfedale as a Local Growth Centre in the Revised Settlement Hierarchy based upon both its function and sustainability and its capacity to accommodate the identified level of growth.

MATTER 3 – Revised Spatial Distribution of Development

Key issue: Is the proposed revised spatial distribution and location of development appropriate, effective, deliverable, locally distinctive and justified by soundly-based, robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with the latest national policy?

c. Wharfedale

Objection by Burley Parish Council

Burley Parish Council does not support the designation of Burley-in-Wharfedale and Menston as Local Growth Centres because the impact of the extra housing associated with this upgrading has not received relevant local consultation. The modifications require additional review to deal with the impact such as education, health and transport on these settlements and on the Wharfe Valley in particular, but such revised modifications have no mention the plan. The roles of Burley in Wharfedale, Menston as accessible, attractive and vibrant places to live, work and invest will not be enhanced.’ Unless the infrastructure is enhanced before any additional housing is considered.

The increase in housing numbers for Burley is defended as part of Policy HO3 which is baseline distribution of housing requirements based solely on population. While acknowledging that the population in Burley has increased since the existing Core Strategy was produced it has not increased by 182%.

Burley Parish Council supports Objective 2 “To ensure that the district’s needs for housing, business and commerce are met in full in sustainable locations that reduce the need to travel and are well served by public and services, whilst prioritising, the use of deliverable and developable previously developed land.” But the additional housing proposed for the Wharfe Valley and Burley in particular is not in keeping with Objective 2 because it will not be built in sustainable locations and it does not prioritise ‘brownfield’ sites and will only be possible at the expense of the greenbelt. Because of this fact the additional housing proposed cannot be justified in the light of this Objective 2.

i. Why has the apportionment of development to the Wharfedale sub-area (including Ilkley [800-1,000], Burley-in Wharfedale [200-700], Menston [400-600]) been increased from 1,600-2,500 dwellings?

In 2011, there were 3080 dwellings in Burley-in-Wharfedale (ONS Neighbourhood Statistics). The proposed development of 700 dwellings in the period up to 2030 represents an increase of almost 25%.

Bradford Council indicates that housing is focused in the areas which are likely to see the greatest levels of population change i.e. are in the larger urban centres and not in the smaller villages and that, following the main modifications, the Council's proposed distribution of housing reflects these patterns of need and is still overwhelmingly focusing development within the main urban centres. The Council also states that the proposed changes to housing distribution are a modest but reasonable and justified amendment to the approach within the Core Strategy Publication Draft. However, in the case of Burley-in-Wharfedale, an almost 25% increase in its size cannot be described as a modest approach.

There is no specific justification for the increased quantum of development proposed in terms of the factors which influence the individual settlement targets, other than in relation to Burley-in-Wharfedale's position in the revised settlement hierarchy. Other factors set out in the Housing Background Paper, such as land supply and environmental constraints are not included in the justification. Furthermore, the population proportionate target for Burley-in-Wharfedale is 518 which would seem to indicate that other factors have played a more significant role in the 700 dwelling requirement figure.

ii. Does the amended distribution of development properly reflect policy constraints (eg. Green Belt), physical constraints, such as flooding, infrastructure, facilities, traffic and transport, heritage, landscape and environment (including the updated HRA), the latest land availability information, and cross-boundary implications?

Burley Parish Council considers that the proposed increase in the dwelling requirement for the parish does not properly reflect policy constraints.

SPA

Burley-in-Wharfedale is located wholly within the 400m – 2.5km SPA buffer zone. The Parish Council's concerns relating to the justification for housing growth based on the updated HRA have been set out in relation to the consideration of Matter 2.

Green Belt

The Green Belt boundary is drawn tightly around Burley-in-Wharfedale and the Main Modifications indicate that the creation of 700 new homes will be through redevelopment of sites within the settlement and with a significant contribution from green belt changes (Sub Area Policy WD2).

The NPPF indicates that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. As the National Planning Policy Framework should be read as a whole, housing need alone is not the only factor to be considered when drawing up a Local Plan and reviewing Green Belt boundaries. The Framework is clear that local planning authorities should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include land designated as Green Belt. As the Main Modifications would seem to indicate that significant changes to the Green Belt boundary around Burley-in-Wharfedale would be justified in order to meet the requirement for 700 new homes, the Parish Council is of the view that this would be contrary to national planning policy.

In terms of the five purposes served by the Green Belt, the Bradford Growth Assessment: Local Growth Centres undertaken by BroadwayMalyan in November 2013 indicates that the Green Belt around Burley:

- Contributes towards helping to prevent the merging of Burley and the neighbouring settlements of Ilkley, Otley and Menston. The gap between neighbouring settlements varies from approximately 400m and 2km.
- Plays a significant role in safeguarding the countryside from encroachment, particularly to the south and west of the village
- Helps to preserve the setting of Burley Conservation Area and historical assets, particularly to the north and east, by defining a contained settlement setting. This consolidates the traditional village character of Burley
- As with all settlements within Bradford District, it contributes towards encouraging the efficient use of previously developed and derelict land within urban areas.

The report goes on to state that should Green Belt development be required at Burley, the focus should be to the north, north west and east which are less environmentally constrained and have good accessibility to existing social and economic facilities and services. However, significant consideration would need to be given to the importance of maintaining an adequate separation gap between Burley and Menston.

Flooding

There is a significant area at risk of flooding to the east, north and south east. There are also smaller pockets of flood risk to the north west and south east, but these do not abut the settlement boundary. These will constrain housing development to the north and east of the village.

Heritage

The Burley-in-Wharfedale Conservation Area Assessment 2004 highlights that the village has maintained its distinctly rural atmosphere. The land on which the village is located is relatively flat, as it is in the valley of the River Wharfe. However, rising moorland surrounds it on all sides and this provides an attractive backdrop to many views through the settlement. This interaction between the built form of the village and its wider landscape context is an important one, as it creates a notable sense of place.

Views into and out of Burley Conservation Area are, however, fairly limited, due to the flatness of the land, the orientation of streets and buildings and the development of modern housing stock around the historic core. The most impressive views into the conservation area, and Burley itself, are from the east. The openness of the surrounding farmland exposes images of some of the settlements most distinctive and impressive structures in their settings, the spire of St. Mary's Church, Burley House and Burley Lodge.

It goes on to advise that the need to ensure that the interaction between the built form of the village and its landscape setting are maintained may constrain housing development.

Landscape

The Bradford Landscape Character SPD details the condition of Bradford's landscapes and their sensitivity to change. It indicates that Wharfedale still retains much of its rural and agricultural character and generally has a well-kept, prosperous appearance which contrasts with the craggy Ilkley Moor to the south.

The main settlements of Addingham, Ilkley, Burley in Wharfedale and Menston are sited on the valley floor and, although substantial residential expansion has consolidated their centres, they still retain their traditional character. These settlements have strong edges and are distinctly separated from each other.

Opportunities for new development in Wharfedale are limited by the need to preserve the sharp edges of the existing settlements. The retention of the separate identity of the existing towns and villages through physical separation should be a long term aim.

Infrastructure

The Bradford Growth Assessment indicates that Burley-in-Wharfedale has a good range of local community facilities and services, but there are gaps in open space provision and an education capacity deficit. Public transport is good. It also recognises that new housing could help support the local village centre and help facilitate a new park and ride scheme which would benefit both existing and new residents. It also has the potential to provide new community facilities such as open space. However, development which is not proportionate to the existing settlement may affect the settlements existing character.

It is therefore important that infrastructure deficits are addressed before new development is completed and that the infrastructure needs of any proposed increase in housing are identified and met.

Latest Land Availability Information

Although the Bradford SHLAA Update 2015 does not, in itself, determine whether a site should be allocated for housing development, it does give an indication of land available. It shows that there is a potential supply of housing land that is sufficient to accommodate 700 homes in Burley-in-Wharfedale but concludes that only a quarter of the sites identified in the SHLAA are considered to be suitable now. The remainder are constrained by adopted policies, mainly Green Belt. Only 3 of the sites included in the SHLAA are previously developed land. These have an identified potential capacity for about 120 dwellings.

It is therefore the view of Burley Parish Council that the constraints set out above have not been properly reflected in revised housing requirement figure for Burley-in-Wharfedale.

iii. Is the amended distribution of development likely to be deliverable over the plan period, and does it reflect an appropriate balance between brownfield and greenfield land?

In the case of Burley-in-Wharfedale, the amended distribution of housing development is unlikely to be deliverable over the Plan period as most of the potential sites are constrained by Green Belt policy. There are also other significant constraints, such as flooding risk and potential impact on the South Pennines SPA/SAC.

In terms of the Green Belt, it would be necessary to demonstrate exceptional circumstances through a Green Belt review before sufficient land for 700 dwellings could be identified and this is likely to require the consideration of the purposes of the Green Belt around Burley as well as reasonable alternatives if sites in Burley are to be justified. Housing need alone

would not be sufficient justification. It would also be necessary for further survey and site testing in terms of ensuring that the risk to the South Pennines SPA is managed. There is no certainty that these processes would deliver the sites necessary to accommodate 700 houses.

Furthermore, the potential sites are mainly greenfield and will therefore require additional on-site infrastructure.

Policy SC5 of Bradford's Core Strategy indicates that the first priority in terms of the location of development is the re-use of deliverable and previously developed land and buildings; provided that it is not of high environmental value. In the case of Burley-in-Wharfedale, there is little available land that falls into this category. Only 3 of the sites identified in the SHLAA are classified as previously developed land. Of these, two sites, those at Moor Lane Resource Centre and The Malt Shovel, have an estimated capacity of 45 dwellings. The third site, Greenholme Mills, is a partly used mill complex with various outbuildings which now has planning permission for a crèche, spa/gym and restaurant together with 20 new build houses and 6 new build apartments. All three sites that are on previously developed land have been granted planning permission for new homes.

Consequently, the requirement for Burley-in-Wharfedale to accommodate 700 houses will not help create an appropriate balance between brownfield and greenfield land as a significant proportion of the dwellings to be provided will inevitably involve the development of greenfield sites.

Yours sincerely

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