



Examination of the Bradford Local Plan Core Strategy Proposed Modifications

Matters, Issues and Questions for Examination

This representation is made by WYG on behalf of Avant Homes (formerly Gladedale Estates Ltd) in response to the Matters, Issues and Questions identified by the Inspector for discussion at the forthcoming hearing sessions for the Examination of the Bradford Local Plan Core Strategy Main Modifications and supplements earlier submissions made to the Core Strategy. In particular the submission is made in relation to Avant Homes land holding ("the Site") to the east of Otley Road, Menston.

The submission addresses the following Matters, Issues and Questions, Matter 2: Revised Settlement Hierarchy and Matter 3: Revised Spatial Distribution of Development.

Matter 2: Revised Settlement Hierarchy (Policy SC4 and associated policies)

The Council proposes to amend the Settlement Hierarchy in the submitted plan to include Burley-in-Wharfedale and Menston in the category of Local Growth Centres.

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?

- a. **What is the basis and justification for the revised settlement hierarchy, and is it based on up-to-date and robust evidence?**
- b. **Does the revised settlement hierarchy reflect the existing and future status, role and function of the relevant settlements?**
- c. **What are the implications of including Burley-in-Wharfedale and Menston in the category of Local Growth Centres in terms of their future role and levels of growth, and are there any cross-boundary implications?**



As set out in our representations to the Proposed Main Modifications Consultation we support the identification of Menston as a Local Growth Centre and consider that Menston is a sustainable settlement for this level of growth (600 dwellings over the Plan period), which we consider should be seen as a minimum.

We consider that the amended status and role of Menston is appropriate, justified, effective, positively prepared, soundly based and consistent with the latest national policy.

We consider the revised settlement hierarchy is justified in the context of the housing requirement for the Wharfedale sub area. With specific regard to Menston we consider its sustainability benefits make it well placed to accommodate further housing growth. We consider that the elevated status of Menston to Local Growth Centre is justified based on:

- Menston's role in the settlement hierarchy and ability to deliver housing for the Wharfedale sub area;
- The lack of physical constraints to housing development in Menston;
- The viability of housing development in Menston;
- Menston's access to facilities and services; and
- Menston's public transport links.

The Local Growth Centres of Menston and Burley in Wharfedale are second in the settlement hierarchy to Ilkley, as the Principal Town in the Wharfedale sub area. The housing requirements for the settlements in Bradford should be apportioned to take account of sustainability, land availability and major constraints. It is noted that the Principal Town of Ilkley is partly constrained by flood risk to the east and west with areas surrounding the River Wharfe in flood zone 3. It is therefore essential that there is a sufficient supply of suitable, available and deliverable sites from other key settlements in Wharfedale such as Menston to ensure that the objectively assessed development needs can be met in sustainable locations. In this context the proposed increase in housing numbers in Menston from 400 to 600 is considered essential but potentially modest.

There are no major constraints to development in Menston. The Bradford Council Settlement Study which was prepared as an evidence base document for the Core Strategy (2011) identifies in respect of the natural environment that Menston is surrounded by greenfield land and is located within the Wharfedale Landscape Character Area where the land surrounding the settlement is of medium sensitivity. There are no nature conservation designations within or in the vicinity of Menston. There is not a major flood risk issue in Menston, and the majority of the settlement is in Flood Zone 1 which is at low risk of flooding. The Bradford Growth Assessment (November 2013) prepared by Broadway



Malyan states that the Green Belt surrounding Menston provides a limited contribution to the role of the West Yorkshire Green Belt.

Furthermore the revised Habitats Regulation Assessment (November 2015) has concluded that the Proposed Modifications to the Core Strategy will not result in adverse effects on the ecological integrity of the North Pennine Moors SAC and SPA, South Pennine Moors SAC and South Pennine Moors Phase 2 SPA. The Core Strategy can be considered compliant with the Habitats Regulations in respect of all four of these sites. This evidence is considered both robust and up to date and supports the role of Menston as a Local Growth Centre.

It is recognised in the Core Strategy that Menston is a desirable location to live. The Bradford District Local Plan Core Strategy Publication Draft Viability Assessment (December 2014) identifies that Wharfedale is in value area 1 which generates the highest site values in the district and where sites should be able to provide 30% affordable housing. The Bradford Strategic Housing Market Assessment (SHMA) identifies that access to affordable housing is an issue for existing and newly forming households in Wharfedale and that the Local Plan needs to ensure the delivery of affordable housing alongside market housing in the area.

The NPPF makes clear, particularly at paragraph 173 and 174 that ensuring viability and deliverability is a central aspect of plan making and that pursuing sustainable development requires careful attention to viability. There are no apparent major viability issues in Menston and therefore, it is important that such suitable market areas are not overlooked in terms of housing delivery. They will make very important contributions to housing delivery in the early plan years and can deliver a proportion of affordable housing and community benefits. A number of areas in Bradford have viability challenges where development is not likely to be viable and therefore sufficient growth should be focused in the areas where viability is not as challenging to ensure that the Plan is sound and deliverable.

We consider that Menston has an important role to play in the Wharfedale sub area as a sustainable location for housing growth. Menston has a good level of facilities (as confirmed in the Bradford Council Settlement Study October 2011) with a doctor's surgery, a pharmacy, a dental practice, a nursery, a primary school, a secondary school, a number of shops, pubs, hairdressers, a church, a park, library and community centre. A new small supermarket is currently being constructed in Menston, adjacent to the A65.

Menston is well located in relation to other higher order settlements, in particular the Principal Town of Ilkley (a distance of approximately 7.5km), and Otley (a distance of approximately 4km) and Guiseley (a distance of approximately 2.5km) in the Leeds district. These towns can be accessed via



regular public transport links therefore reducing the need to travel from Menston by car to access further services and facilities.

Menston also has excellent accessibility by public transport to other destinations in West Yorkshire. Menston railway station provides regular services on the Wharfedale line to Leeds, Bradford, Guiseley, Burley in Wharfedale, Ben Rhydding, Ilkley, Baildon, Shipley and Frizinghall. There are also a number of regular bus services which serve Menston, including the 967, 33/33A, 650, 653, and X53 to destinations including Leeds Bradford Airport, Otley, Guiseley, Horsforth, Kirkstall, Leeds city centre, Baildon, Shipley, Bradford and Harrogate. It is also well connected by road with the A65 passing through Menston.

Whilst there may be some cross boundary implications associated with housing development in Menston for Leeds City Council, we consider this can be dealt with by the continuing duty to cooperate process. Leeds City Council has not raised any objections to the elevated status of Menston to a Local Growth Centre and has indicated it wishes to continue to work with Bradford Council to consider detailed issues as appropriate arising from specific proposals.



Matter 3: Revised Spatial Distribution of Development (Policy SC5 and associated policies, including Policies BD1, AD1, WD1, PN1 & HO3)

The Council proposes to amend the Spatial Distribution and Location of Development in the submitted plan in respect of the Regional City of Bradford (including Shipley & Canal Road Corridor, Shipley and Bradford North-East), Airedale (including Silsden and Baildon), Wharfedale (including Ilkley, Burley-in-Wharfedale and Menston) and South Pennine Towns and Villages (including Haworth).

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?

a. **Wharfedale**

- 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?**
- 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?**
- 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?**

Our general response to the amended apportionment of development in the Wharfedale sub area is set out in response to Matter 2 above and we do not wish to repeat our comments. We support the amended apportionment of development and consider that Menston is a sustainable settlement for housing growth, where land is available for development and that development is achievable and viable.



We consider that the amended distribution of development properly reflects policy constraints, physical constraints, land availability and cross boundary implications. Our comments to this are set out in our response to Matter 2.

We consider that the amended distribution of development is likely to be deliverable over the plan period for the Wharfedale sub area. A number of sites in Menston have been assessed through the Bradford SHLAA (2015) which have been identified as potentially suitable for housing development.

In particular, we make these comments with specific reference to a 4.1 hectare site located to the eastern edge of Menston which we consider would provide a potentially suitable housing site adjacent to the settlement which should be considered through the Site Allocations process. The most recent SHLAA identifies the site (ME/013) as amber 'potentially suitable – local policy constraints' confirming that it has the potential to deliver 107 homes. Whilst it is not explicit within the SHLAA we understand that the current Green Belt designation is the policy constraint being referred to in the SHLAA table.

The Site is considered to be in a sustainable location adjacent to the built up area of Menston and benefits from good access to services and facilities. We consider that the Site can be sensitively developed in a way that represents a logical rounding off to the east of the settlement and creates some balance to the growth of the settlement with potential for direct access from the A65, minimising the potential impact of through traffic on the more localised network within the settlement.

We consider the Site would provide the opportunity for a viable and deliverable residential development in an area where there is high market demand which could create a critical mass of development to contribute to the viability of existing facilities and services and make provision to further local infrastructure including, public transport, recreational spaces, education and affordable housing. The Site is well related to the main highway network and public transport facilities. The scale of this development will enable a comprehensive package of sustainable transport measures to be delivered more effectively.

We consider that a site of this scale can be brought forward in a comprehensive way and there is encouragement for a larger scale of development rather than isolated sites as supported by paragraph 52 of the NPPF. There is a genuine opportunity for working with the local communities to explore the ability to deliver a scheme which could offer enhanced local facilities. This can be delivered in the context of an overall quality design that will generate an ability to achieve a distinctive character reflective of Menston and as such a 'sense of place'.



The Site is in single ownership and there are no legal or other constraints to prevent it being brought forward in the short term. The promoter of the site would be prepared to set up a Consultative Forum to work with the local stakeholders, including the Parish Council, to explore how this site may be brought forward. Given the above, it is clear that the site can contribute to the 600 dwelling requirement for Menston in a sustainable location.

Whilst Green Belt release will be necessary to meet the housing requirement in Menston, exceptional circumstances exist, in accordance with paragraph 82 and 83 of the NPPF which justify the requirement to review the Green Belt boundaries in order to meet the development needs for housing in full and in order to support the long term economic success of the district. The Core Strategy recognises that Green Belt release of land for approximately 11,000 dwellings will be needed to meet the housing needs of the district.

The balance between brownfield and greenfield land should be considered across the district, rather than on a settlement basis. There is brownfield land available in the Bradford urban area whereas the tightly defined settlement limits of settlements such as Menston has led to limited opportunities for brownfield development and therefore greenfield land will be required to meet the housing requirement.