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Dated: April 2016



**Representations to City of Bradford  
MDC Core Strategy DPD – Schedule of Matters, Issues & Questions  
for Examination – with Specific Reference to  
Land at Hag Farm Road, Burley-in-Wharfedale –  
SHLAA Reference BU/004**

On behalf of

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## **1.0 Introduction**

- 1.1 Following instructions from Jeffrey Rothery, ID Planning were commissioned to make representations to the emerging Bradford Core Strategy DPD. Representations have been made regarding the proposed modifications issued for consultation in November 2015 and are now being made with respect to the Schedule of Matters, Issues & Questions (MIQs).
- 1.2 These representations are made in the specific context of the development potential off land at Hag Farm Road, Burley-in-Wharfedale under SHLAA Reference BU/004.
- 1.3 It should be noted that Jeffrey Rothery holds the freehold interest of the land in question.
- 1.4 An assessment of the MIQs has taken place and comments are provided below in response to Matters 2 and 3.

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## 2.0 Representations to the Core Strategy DPD Schedule of Matters, Issues & Questions (MIQs)

- 2.1 These representations have been prepared in relation to the City of Bradford MDC Core Strategy DPD MIQs. We respond to Matters 2 and 3 in relation to the subject site and to comment in line with the requirements of National Guidance.

### Representations on MIQs

#### Matter 2: Revised Settlement Hierarchy

- 2.2 Matter 2 relates to the Council's proposal to amend the Settlement Hierarchy and include Burley-in-Wharfedale and Menston in the category of Local Growth Centres.
- 2.3 Jeffrey Rothery **supports** the Council's inclusion of Burley in Wharfedale and Menston within the list of Local Growth Centres and consider this to be justified, effective, positively prepared, soundly based and consistent with the latest national policy.
- 2.4 It is considered the baseline information that influenced the settlement hierarchy, namely the settlement study (EB/040 to EB/042) and the Bradford Growth Assessment (EB/037) were robust assessments that had been developed on the basis of detailed analysis and adopted policies within the RUDP and RSS and updated to reflect the current situation. It is therefore considered that this evidence base is robust, being reflective of previous assessments and policies but up-to-date as it utilises the latest and updated assessments.
- 2.5 Burley and Menston were identified in the CS Further Engagement Draft (CSFED) as Local Growth Centres, informed by the Council's Settlement Study, in recognition of their location and accessibility to key transport links and their range of shops, services and community facilities.
- 2.6 However, this was changed due to the Habitat Regulations Assessment (HRA) that sought to restrict housing development in the areas within 2.5km of the S Pennines SPA & SAC. Following amendments to the HRA this restriction is no longer in place therefore there is no justifiable reason for restricting housing growth that is reflective of a Local Growth Centre within Burley and Menston as per the original settlement studies and CSFED classification.
- 2.7 The Core Strategy sets out the reasons for creating the tier of Local Growth Centres as being settlements classified between the Principal Towns and much smaller Local Service Centres. Due to the scale, location and level of amenities within Burley and Menston, it is considered this is an appropriate classification. Burley and Menston include a wide variety of local amenities including a variety of shops, schools, nurseries and train stations that all serve wider communities and not just those local needs within the respective settlements.

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- 2.8 Facilities within Burley include a train line that connects the settlement with Bradford, Ilkley and Leeds, nursery and pre-schools, schools, overnight accommodation, a range of shops, pubs, restaurants, a variety community facilities and services plus a number of bus services to Leeds, Harrogate, Knaresborough, Bradford, Guiseley, Wetherby, Otley, and Ilkley.
- 2.9 One of the key facilities that currently supports Burley and will support its future growth is the train station. Burley train station is on the Wharfedale line from Leeds and Bradford to Ilkley and would therefore accord with the Local Growth Centre classification within policy SC4 as, being 'located along key public transport corridors'. As a result of this important public transport connection it is considered Burley should 'make a significant contribution to meeting the districts needs for housing, employment and provide for supporting community facilities'. It should also be noted that the station not only serves the local Burley community but also commuters and leisure travellers from other nearby communities outside of Burley.
- 2.10 It should also be noted that the other proposed Local Growth Centres are located to the north and west of the District and largely serve Bradford and Airedale. Burley and Menston would perform similar functions in this part of the district serving not only Bradford but the Principal Town of Ilkley plus areas within Leeds including Guiseley and Otley. It is important to ensure there is a suitable geographical spread of Local Growth Centres to ensure the development needs of the whole district are met and not constrained geographically.
- 2.11 Based on the above it is considered the revised settlement hierarchy is based on robust and up-to-date evidence that is reflective of the existing and future status, role and function of Burley and Menston. There are no adverse implications for including Burley and Menston as a Local Growth Centres as this will allow for these settlements to continue to support their own communities plus those adjacent communities including the Principal Town of Ilkley and other settlements within Bradford and Leeds district.

### **Matter 3: Revised Spatial Distribution of Development**

- 2.12 Matter 3 relates to the Council's proposal to amend the spatial distribution of housing in the submitted plan. It is proposed to increase the apportionment of development in Wharfedale from 1,600 to 2,500 dwellings. In addition, it seeks the following broad distribution: -
- Ilkley – increase of dwellings from 800 to 1,000
  - Burley in Wharfedale – increase of dwellings from 200 to 700
  - Menston – increase of dwellings from 400 to 600
  - Addingham – maintained at 200
- 2.13 Jeffrey Rothery supports the Council's revised spatial distribution and considers it to be appropriate, effective, deliverable, locally distinctive and justified by soundly-based robust, proportionate and credible evidence.

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- 2.14 As highlighted in our previous representations, it is considered that the increase in the housing requirement for Wharfedale and the increase of the number of residential units for three of the four settlements is **sound** and that it meets the four tests of soundness and that this main modification has been positively prepared, is justified, is effective and consistent with National Policy based on the adjustments to the settlement hierarchy derived from the amendments to the HRA.
- 2.15 Following the revisions to the HRA it is appropriate to increase the housing apportionment within the Wharfedale sub-area to assist in achieving the identified housing need of 42,100 homes over the plan period.
- 2.16 The council have correctly identified that the main housing growth should be in the areas of greatest need and not the smaller villages. Many of the smaller villages have major constraints to growth and are located in areas away from and not directly connected to the Principal Towns and Regional City. As highlighted above, Burley and Menston are within close proximity to Ilkley, a Principal Town and within easy reach of the Regional Cities of Bradford and Leeds. Burley is a desirable area where, due to the level of amenities, geographical location and good public transport links generate significant housing need. As such an increased housing provision in Burley will help meet this need and the connections to the larger urban centres will help ensure the economic success of the urban centres.
- 2.17 Some of those constraints within the smaller villages relate to the heritage assets within and around those villages therefore in order to meet the housing targets it is considered housing growth in Burley and the Wharfedale sub-area that has fewer constraints is appropriate and robust.
- 2.18 Burley does not have any material flood restrictions and as highlighted above includes a good provision of local amenities and excellent public transport facilities. Burley is located adjacent to and well connected to major highway infrastructure and experiences relatively limited landscape and environmental constraints. On that basis the increase in housing provision from 200-700 is considered to be appropriate and can be accommodated within the policy constraints.
- 2.19 The increase in housing provision within Burley can be delivered over the plan period as there is more housing land available than the apportionment requires. With regard to the Hag Farm Road site in particular, Jeffrey Rothery owns the site and has secured firm interest from developers in developing the site therefore the housing proposed on site BU/004 is deliverable over the plan period.

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## 3.0 Conclusions

- 3.1 Jeffrey Rothery is supportive of the Main Modifications to which Matters 2 and 3 of the MIQs relate. The proposed modifications are considered to be appropriate, effective, deliverable, locally distinctive and justified by soundly-based robust, proportionate and credible evidence.
- 3.2 The modifications reflect a detailed and robust evidence base that has built upon the evidence utilised for the RUDP and RSS and updated this to reflect the current situation. This evidence base has subsequently been supported throughout the Local Plan process. Importantly the HRA has been amended therefore the revised settlement hierarchy and housing growth apportionment has been amended in direct response to this revision.
- 3.3 Burley and the Wharfedale-sub-area are of a scale and geographical location that are appropriate for additional housing growth to further support the local and wider communities. Furthermore, there are sufficient sites within Burley to deliver the proposed growth within the plan period and the Hag Farm Road site in particular is available, deliverable and achievable.
- 3.4 On the basis of the above Jeffrey Rothery supports the Proposed Main Modifications and the Council's responses in respect of the MIQ Matters 2 and 3.