



# Bradford Local Plan Core Strategy Examination – Proposed Main Modifications

## Further Hearing Statement

### Representations on behalf of CEG Land Promotions Ltd (CEG)

Date: April 2016

#### **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?***

- 1.1 The Inspector will be aware that the position of Burley-in-Wharfedale (alongside Menston) in the settlement hierarchy is a matter upon which CEG has previously commented, including providing detailed submissions to the earlier hearing sessions (Matter 3.2 – Document PS/D025) and actively contributing to the debate at that time.
- 1.2 CEG supports the proposed modifications to the settlement hierarchy as defined in Policy SC4 (Main Modifications 7-13) for all the reasons that it has previously provided and considers that such amendments are a fundamental requirement in order for the Core Strategy to be considered sound. CEG incorporates, but does not repeat, all of its previous submissions and evidence to that effect, now supplemented by the Council's further work that underpins this change.
- a What is the basis and justification for the revised settlement hierarchy, and is it based on up-to-date and robust evidence?**
- 1.3 This question was addressed in CEG's consultation response dated January 2016 to the Main Modifications 7-13 and CEG's previous submissions and evidence on this topic. To avoid repeating previous submissions, we would

direct the Inspector to paragraphs 2.2-2.10 of that consultation response document.

1.4 In summary, the amendment to the settlement hierarchy to upgrade the status of Burley-in-Wharfedale (and Menston for that matter) is not a new proposition and it is certainly one that is fully justified by the underlying evidence base. It simply reinstates those settlements to their correct status as Local Growth Centres, as they were properly assessed to be in the earlier Further Engagement Draft of the Core Strategy. This in turn was based upon Bradford Council's draft Settlement Study (EB/040-42) and the work which underpinned it. This remains the Council's most up to date objective and comparative analysis of its settlements. Nothing has materially changed to affect Burley's status, save for the further evidence which has emerged to demonstrate Burley's capacity to accommodate growth consistent with that status. Local Growth Centres were identified at that time, not only because of their acknowledged status as settlements which could accommodate growth in a sustainable manner, but also because of the relative constraints within the Regional City of Bradford element of the District.

1.5 The Inspector will also be aware that CEG undertook its own comprehensive assessment of the sustainability of Burley-in-Wharfedale and how it compares to other identified Local Growth Centres. This was presented as evidence at the earlier hearing sessions (Appendix 1 to CEG Matter Statement 3.2 - (PS/D0025/d)). Without repeating those findings in detail, it identified empirically why the settlement is a sustainable location with excellent transport links and a wide range of shops, services and community facilities. It further identified why it had the capacity for growth in the most viable area for housing development in the plan area. Based upon such an objective comparative analysis, Burley's status as Local Growth Centre clearly sits very comfortably within this tier of the hierarchy and its previous downgrading was inconsistent with the evidence that existed, and both inappropriate and unsound.

1.6 Finally, Burley-in-Wharfedale clearly accords with the description of a Local Growth Centre, as defined in parts A and B of that section of draft Policy SC4. It is self-evidently located along a 'key public transport corridor' and it is clearly an 'accessible, attractive and vibrant place to live, work and invest'.

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

1.7 Yes. The identification of Burley-in-Wharfedale as a Local Growth Centre is consistent with its existing status as identified in the Replacement Unitary Development Plan for Bradford (RUDP) adopted in October 2005. Paragraphs 3.82 – 3.82c refer to the location of development in the context of meeting the housing requirements identified in that document. Paragraph 3.82b deals specifically with the settlement hierarchy, identifying Burley-in-Wharfedale, Menston, Steeton and Thornton (all now proposed as Local Growth Centres in

the Core Strategy) at a tier above smaller settlements in the sequential approach adopted in that document to identifying sites for housing. Nothing has changed, save for yet further evidence as to Burley-in-Wharfedale's capacity and suitability to accommodate growth. That status was based on those settlements being identified as "nodes in good quality public transport corridors" and this clearly remains the position for Burley-in-Wharfedale.

1.8 The identification of Burley-in-Wharfedale and Menston as Local Growth Centres in the Core Strategy therefore simply represents a continuation of this previous approach into the future.

1.9 Not only does this both reflect and accord with its existing status, but the identification of Burley-in-Wharfedale as a Local Growth Centre reflects its ability to accommodate appropriate levels of growth beyond its population baseline in a sustainable manner. It has been highlighted above that it is a highly sustainable location benefiting from excellent public transport links and a range of services. As CEG's Further Statement to Matter 3 further demonstrates, the settlement is clearly capable of accommodating a level of growth commensurate with its role as Local Growth Centre.

**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?**

1.10 Such issues have been largely addressed in response to questions a and b above. It has been demonstrated that Burley-in-Wharfedale clearly meets the definition of a Local Growth Centre. It is consistent with the approach taken in the Replacement UDP and earlier drafts of the Core Strategy and it properly reflects their future role.

1.11 CEG's statement on Matter 3 (Spatial Distribution of Development) summarises why levels of housing commensurate with its role as a Local Growth Centre are capable of being accommodated in the context of existing policy and environmental constraints and that existing and proposed infrastructure is capable of accommodating such a level of development. Moreover, the level of housing commensurate with its identification as a Local Growth Centre provides opportunities to make improvements to local infrastructure that may otherwise not be feasible.

1.12 The identification of Burley-in-Wharfedale as a Local Growth Centre is not considered to raise any cross-boundary issues. Development associated with its status a Local Growth Centre is not reliant on service provision in other Local Authority areas (i.e. Leeds CC) and would not impact upon the strategic planning decisions made in such areas. It is noted that Leeds City Council has not objected to the inclusion of Burley-in-Wharfedale or Menston as Local

Growth Centres in the defined Settlement Hierarchy, or indeed the resultant increases in housing provision.