

Dear Development Plan team,

I would like to make the following representation with regards the **Bradford Local Plan Core Strategy – Main Modifications**.

I understand that the consultation runs from Wednesday 25 November 2015 until 4pm on Wednesday 20 January 2016.

1. INTRODUCTION

- 1.1 I would first of all wish to express our support for the recognition of Burley in Wharfedale as a Local Growth Centre, as an accessible, attractive and vibrant place to live and this should be enhanced.
- 1.2 We support MM2 and Policy SC1 Part B5 and the amended wording which recognises the roles of the Principal Towns of Ilkley, Keighley and Bingley and the Local Growth Centres of **Burley in Wharfedale**, Menston, Queensbury, Thornton, Silsden and Steeton with Eastburn as hubs for the local economy, housing and community and social infrastructure and encourage diversification of the rural economy of the district.
- 1.3 Similarly we support the proposed modifications which reflect the revised settlement hierarchy and changes within Policy SC4 which in turn reflects the revised HRA and the **increased housing targets proposed for Burley** and for Menston. See MM7 below.
- 1.4 We welcome the proposed modification in MM3 and Policy SC1 Part B6 – which amends the Support for the Local Service Centres as defined in Policy SC4 in providing to meet local needs for homes and local services. We also welcome the clarification in proposed modification PS/F032, which ~~reflects the statement changes that were advocated to remove any mistaken impression that the local housing need assessments would be required when planning applications are submitted and also to underline the fact that housing distribution targets have not been based on settlement by settlement local needs calculations.~~ Deleted: is a
- 1.5 We support MM4 and the additional text to back up Policy SC1 which refers to supporting key hubs, which are a series of networks or convergence of functions of the individual towns and local centres where the growth of the local economy, an increase in the supply of housing and the development of the social structure of the community are all interrelated. The various components of the settlement when considered and addressed as a whole, can lead to a more balanced and sustainable centre. These locations, through their connected activity, will provide an important focal point for services, facilities and employment and cultural activity, improving their performance, management and attractiveness.

1.6 Collaborative working is something we firmly believe in and we have been working closely with Burley in Wharfedale Parish Council in assisting them in their task of producing their Neighbourhood Plan and identifying the **most appropriate sites** and therefore support MM5 and Policy SC3, which refers to the importance of “Working Together” and **Effective collaboration** between the Council, adjoining local planning authorities, the District’s Town and **Parish Councils**, partners, **stakeholders** and communities within the District, Leeds City Region and beyond. I have emphasised **appropriate sites** as we feel this is very important and we note that you also make reference in the section on the release of green belt sites that the principles of including land in the green belt and its 5 main purposes should be the criteria by which sites are identified to come forward and their deliverability in terms of 5 year supply and phasing. That is to say that sites which are readily deliverable and do not offend or cause material impact on the purposes of the green belt should be considered the **most appropriate** and maybe considered suitable for development in the short term.

1.7 Following our support for MM2, MM7 sets out the policy relating to the Local Growth Centres, such as **Burley in Wharfedale** being one of the most sustainable local centres which is accessible to higher order settlements such as Bradford, Keighley and Ilkley. All such Centres are located along key road and public transport corridors and should therefore make a significant contribution to meeting the districts needs for housing, employment and provide for supporting community facilities. **The role of Burley in Wharfedale as an accessible, attractive and vibrant places to live, work and invest should be enhanced.** The proposed modifications reflect the revised HRA and the related increased housing targets for **Burley** and Menston. They reflect the sustainable nature of the two added settlements as locations for some growth. Paragraph 3.71 is amended as follows: ‘**The Local Growth Centres within the district are, Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton,** as identified on the Core Strategy Key Diagram and in the Sub Areas in section 4). They are the most sustainable local centres and vary in size and function but fulfil a significant role as settlements along key public transport corridors providing attractive and vibrant places for their surrounding areas. These centres will provide an important focal point for affordable housing and market housing needs as well as employment and associated community facilities - complementing and supporting the roles of the Regional City of Bradford, Sub Regional Town of Halifax and the Principal Towns of Skipton, Ilkley, Keighley and Bingley. This focus supports a pattern of service centres to meet the needs of rural areas and support a balanced pattern of sustainable development across the District with high quality links to Halifax, Skipton and Leeds beyond the District boundary.’

Comment [P01]: Should this say “which is” instead of “and”?

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1.7.1 We would suggest that other “specialist” housing should be added to “affordable housing”. The target for affordable housing provision in Wharfedale is proposed to be reduced to 30%, which we welcome and

support but would advocate that other housing needs should be included and considered alongside that particular need. That is to say that in Burley in Wharfedale the Parish Council have done research into local needs and this would suggest that there is not an overwhelming LOCAL need for affordable housing but there is a need for homes for the elderly. In such a case the provision of alternative special housing could replace the affordable housing provision.

1.8 It goes on to state that in identifying and comparing sites for development, the Local Plan will adopt an accessibility orientated approach to ensure that development:

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1. Makes the best use of existing transport infrastructure and capacity.
2. Takes into account capacity constraints and deliverable improvements, particularly in relation to improving and developing the Strategic Road Network including junctions and schemes identified in the spatial vision.
3. Meets or can be mitigated in order to meet the public transport accessibility criteria set out in Appendix 3 and maximises accessibility by walking and cycling.
4. Maximises the use of rail and water for uses generating large freight movements.

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1.9 Following on from 1.6 above we support MM17 and the Green Belt Amended criterion B: Exceptional Circumstances require Green belt releases in order to deliver in full the longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3. These changes will be delivered by a selective review of Green Belt boundaries **in locations that would not undermine the strategic function of green belt** within the Region and that would **accord with the Core policies and the strategic patterns of development set out in Policies SC5 and SC4. The Decisions on allocations on green belt land will be assessed against the purposes of including land in green belt** as set out in national guidance. The selective review will be undertaken **through the Allocations DPD in consultation with local communities and stakeholders**. We believe this to be absolutely key to protecting the integrity of villages such as Burley in Wharfedale and avoiding incursions into the green belt but preferring to select sites which are more discreet and do not extend the boundary of the village but are more akin to “infill” sites.

Comment [P02]: Should this say “Bradford” city region?

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1.10 We applaud and recognise the establishment of exceptional circumstances. In general the Districts Green Belt has helped to achieve the aims set out in NPPF. However, the Council considers, having reviewed the evidence and all reasonable alternatives, that **exceptional circumstances exist** which justify and require a change to the green belt in order to meet its development needs for housing in full and in order to support long term economic success of the district. It is clear based on the land supply in the SHLAA that in order to meet the Housing requirement under policy HO1 in full would necessitate

change to green belt to accommodate around 11,000 dwellings, given land supply constraints in non green belt land. This is supported by evidence in the growth study that land is available in the green belt in sustainable locations which would also not prejudice the strategic function of green belt. The evidence from the Employment Land Review suggests a limited mix of land of the right size and locations to ensure a quality offer for the plan period with only around 50 Hectares considered still suitable. To this end the plan under Policy EC3 identifies a new land supply of at least 135 hectares needs to be allocated which includes at least 84 hectares of new land currently not within the known supply. To this end the policy identifies 3 strategic areas which reflect key market locations where land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations which are not available within the land supply in non green belt locations.

- 1.10.1 Para 3.103 refers to the implementation of the Core Strategy requiring a change to the general extent of the Green Belt through the Allocations DPD in order to fully meet its development needs within the plan period to 2030 as set out in policies HO1, HO3 and EC3, as well as ensuring a green belt which lasts beyond the plan period. Based upon the current evidence of need and land supply a selective review of the green belt is required to meet the unmet needs which cannot be accommodated in non green belt areas. **Localised changes to the Green Belt will be made in sustainable locations** to meet identifiable development needs.
- 1.11 MM5 sets out the increased numbers of housing units for each settlement. Criterion A . Strategic Pattern of Development In accordance with Policies H03 and EC3, Wharfedale will accommodate **2,500** dwellings and approximately at least 5 Ha of new employment land in the period up to 2030. The Council will work closely with partner organisations to ensure that this development is sensitively managed to create vibrant and sustainable communities. The broad distribution of housing development is shown as follows:
- Number of residential units
- Ilkley 1,000
 - Burley In Wharfedale **700**
 - Menston 600
 - Addingham 200
- 1.12 Please see para 1.7.1 and our proposed addendum to the Affordable housing requirements as set out in Policy HO11. Within the Principal Town of Ilkley, the Local Growth Centres of Burley in Wharfedale and Menston and the Local Service Centre of Addingham, there are opportunities for development through infill whilst retaining the character of these places. Under criterion B; **Burley in Wharfedale will see the creation of 700 new homes through redevelopment of sites within the settlement and with a significant contribution from**

green belt changes, together with associated community facilities. We support this proposal but with the caveat that those green belt changes and the site selection needs to be carefully considered against the criteria of the purposes of including land in the green belt – as per MM17 and para 1.9 above and National Guidance.

2. SUMMARY

- 2.1 I/we support all the above modifications subject to the careful consideration of green belt changes in line with the purposes of including land in the green belt in the first place.
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 2.2 We also propose a small addendum to the affordable housing assumption to include or substitute other forms of specialist housing for which there maybe a particular local need.