



WYG on behalf of Avant Homes

# Bradford Core Strategy – Proposed Main Modifications Consultation

[Redacted] Leeds, LS6 [Redacted]  
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## **Bradford Core Strategy – Proposed Main Modifications**

### **1.0 Introduction**

- 1.1 This representation is made by WYG on behalf of Avant Homes (formerly Gladedale Estates). It is made in response to the consultation on the proposed Main Modifications to the Bradford Core Strategy Publication Draft (November 2014). This statement supplements earlier submissions made to the Core Strategy Development Plan Document Publication Draft in March 2014 and in response to the Matters, Issues and Questions identified by the Inspector for discussion at the hearing sessions for the Examination of the Bradford Local Plan Core Strategy ("the Plan") in February 2015.
- 1.2 In particular the submission is made in relation to Avant Homes' land holding ("the Site") to the east of Otley Road, Menston, as indicated on the accompanying site location plan (Appendix 1).
- 1.3 This representation provides our comments on the relevant proposed Main Modifications.

### **2.0 Response to the proposed Main Modifications**

#### **Policy SC1 Overall Approach and Key Spatial Priorities Part B5 (MM2)**

- 2.1 We support the identification of Menston as a Local Growth Centre. This proposed modification reflects the revised settlement hierarchy and changes within Policy SC4 which in turn reflects the revised Habitat Regulations Assessment (HRA) and the increased housing target proposed for Menston.

#### **Policy SC4 Hierarchy of Settlements (MM7, MM8, MM9, MM11, and MM12)**

- 2.2 We support the identification of Menston as a Local Growth Centre and deletion of Menston from the Local Service Centre category. The reason for the modification provided by Bradford Council is *"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."*
- 2.3 We support this modification and 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) which was prepared as an evidence base document for the Core Strategy) with a doctor's surgery, a

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pharmacy, a dental practice, a nursery, a primary school, a secondary school, a number of small shops, pubs, hairdressers, a church, library and community centre.

- 2.4 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 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.
- 2.5 It is clear that Menston is a sustainable settlement, with a range of services and facilities, located along a key public transport corridor and therefore it should make a significant contribution to meeting the districts needs for housing.

### **Policy SC7 Green Belt (MM17 and MM18)**

- 2.6 We welcome the modification to Policy SC7 and its supporting text which provides the justification for the Green Belt review as part of the Local Plan preparation. We consider that the need for the Green Belt review accords with paragraphs 82 and 83 of the National Planning Policy Framework (NPPF) and that exceptional circumstances exist 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. It is clear that in order to meet the housing requirement in policy HO1 in full that a change to the Green Belt to accommodate around 11,000 dwellings is necessary given land supply constraints on non Green Belt land throughout the district. This links in with our comments on MM52 which identifies Green Belt changes at Menston which are required to meet the housing requirement in the Wharfedale sub area.

### **Policy SC8 Protecting the South Pennine Moors and their zone of influence (MM28)**

- 2.7 At the examination hearings in March 2015 the Inspector considered that there were serious questions about the Habitats Regulation Assessment (HRA) December 2014 document which went to the root of the Core Strategy in respect of the housing distribution and the settlement hierarchy which affected the soundness of the Core Strategy and suggested that a revised appropriate assessment may be needed. The revised HRA (November 2015) concluded that the Core Strategy (Proposed Modifications) will not result in adverse effects

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on the ecological integrity of the North Pennines SCA and SPA, South Pennine Moors SAC and South Pennine Moors Phase 2 SPA. The revised HRA has resulted in the increase in housing numbers for Menston which we support.

- 2.8 We support the comprehensive redrafting of policy SC8. Menston is within 2.5km of the South Pennine Moors SPA and therefore would be identified as within Zone B. This policy states that *"It will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitats for qualifying species of the SPA."*
- 2.9 We have some concerns with the introduction of a Supplementary Planning Document which will set out a mechanism for the calculation of the financial contributions to mitigate impacts on the SPA and SAC by reference to development types, the level of predicted impact on the SPA or SAC, and the measures upon which such contributions will be spent. We are concerned that the detail of this is being proposed through a Supplementary Planning Document. The Planning Practice Guidance states that *"policies for seeking planning obligations should be set out in a Local Plan to enable fair and open testing of the policy at examination."* It further states that Supplementary Planning Documents should *"build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development."*
- 2.10 Furthermore the Community Infrastructure Levy Regulations (2010) place limits on the use of planning obligations and impose a limit on pooled contributions from planning obligations towards infrastructure that may be funded by the Community Infrastructure Levy. The mechanism of collecting financial contributions for district wide SPA and SAC mitigation may therefore not be lawful.

### **Policy WD1 Wharfedale Criterion A (MM51)**

- 2.11 We support the increase in the housing requirement for the Wharfedale sub area from 1,600 to 2,500. We also support the increase in the broad distribution of housing for Menston from 400 to 600. Menston is a sustainable settlement and capable of accommodating at least 600 new dwellings over the plan period. We consider that the 600 dwellings should not be considered a maximum and where sustainable opportunities for new housing development are available these should be taken to contribute to meet the housing needs in an area where the market demand is strong. The NPPF requires Local Plans to have sufficient choice and flexibility to accommodate objectively assessed needs for housing, to respond flexibly to changing circumstances and to boost significantly the supply of housing. The Plan should be

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positively prepared and therefore sustainable opportunities for growth should not be restricted by maximum housing requirements for settlements. This is important in the context of Menston where there is some uncertainty about the delivery of existing commitments identified within the Bradford Unitary Development Plan.

- 2.12 Within Wharfedale, Ilkley has been identified as one such settlement where a cautious growth approach will be adopted due to the close proximity to the designated North Pennine Moors SPA and SAC (paragraph 5.3.62). It is therefore essential that there is a sufficient supply of suitable, available and deliverable sites from other key settlements in the settlement hierarchy in the Wharfedale sub area such as Menston.

### **Policy WD1 Wharfedale Criterion B (MM52)**

- 2.13 We support the amendment to Policy WD1 to recognise that there will need to be some local Green Belt changes in Menston. The reason for this modification is *"due to the fact that the CSPD target of 400 new homes could be met without any green belt change whereas the proposed slightly higher target will require some local green belt change. In all cases the need for green belt change is based on data on land supply from the SHLAA."*
- 2.14 Whilst land outside of the Menston settlement boundary currently lies within the Green Belt we consider that there is capacity for further housing to be accommodated and we welcome the change to the Plan which provides an appropriate framework for considering suitable sustainable opportunities which can contribute to the District's significant housing requirement through the Site Allocations process. The SHLAA identifies that there are few physical constraints for sites in Menston, local policy constraints cited generally as the main inhibiting factor.
- 2.15 This modification is necessary to allow opportunities for sites adjacent to the Menston settlement boundary to be appropriately considered through the Site Allocations process. Without this change, the policy would have prejudiced the potential for Menston to contribute to the Wharfedale sub area housing requirement as there are limited development opportunities outside the Green Belt.
- 2.16 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 Strategic Housing Land Availability Assessment (SHLAA) identifies the site (ME/013) as amber 'potentially suitable – local policy constraints' confirming that it has the potential to

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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.

- 2.17 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.
- 2.18 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.
- 2.19 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'.
- 2.20 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 Neighbourhood forum, to explore how this site may be brought forward.

### **3.0 Summary**

- 3.1 To conclude, we support the modifications to the Core Strategy which promote Menston to a Local Growth Centre with a housing requirement of 600. We consider that this requirement should be seen as a minimum rather than a maximum to encourage housing development in a sustainable settlement to contribute to the Wharfedale sub area's housing requirement. We also support the need for a district wide Green Belt review and in particular the need for

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Green Belt changes in Menston to meet the housing requirement. Land at Otley Road can contribute to the housing requirement in a sustainable location which would not harm the purposes of including land within the Green Belt. Taking account of the proposed modifications we consider that the Local Plan is sound and can be considered positively prepared, justified, effective and consistent with national policy.

- 3.2 We do however have some concerns regarding the preparation of a Supplementary Planning Document to set out the mechanism for the calculation of financial contributions to mitigate impacts on the SPA and SAC. We consider that further details need to be provided to allow full consideration of the Supplementary Planning Document.

Appendix 1 – Site Location Plan

