

**Replacement
Unitary Development Plan
for the
Bradford District**

Inspector's Report

**Shiple
Constituency
Volume**

Replacement Unitary Development Plan for the Bradford District

Inspector's Report

Shipley Constituency Volume

Contents

Chapter number and title	Page number
3 Principal Policies	1
4 Urban Renaissance	2
5 Economy and Employment	7
6 Housing	21
7 Centres	65
8 Transport and Movement	68
10 Built Heritage and the Historic Environment	79
11 Community Facilities	80
12 Open Land in Settlements	85
13 Green Belt	105
14 Natural Environment and Countryside	128
15 Natural Resources	131
16 Pollution, Hazards and Waste	

Chapter 3 Principal Policies

PARAGRAPH 3.0:

Objectors

341/11307 *Mr and Mrs James Driver*
3029/11112 *Mr Andrew Carey*

Summary of Objections

- There would be too much development in Bingley, resulting in too much traffic, infra-structure overloading, and a loss of community identity.
- Bingley would become part of a continuous conurbation between Bradford and Keighley.

Inspector's Reasoning and Conclusions

3.1 I deal with many of these points indirectly in considering the allocation at Sty Lane. Bingley is an urban area, where development is to be concentrated. Relief from traffic congestion is to come from the Bingley Relief Road. The Sty Lane section of this volume sets out my views on infra-structure; for example, services like the schools have additional capacity or can be given sufficient capacity to accommodate the likely demands. The new residents would support services and community facilities; I do not see why there should be a loss of community identity. Green Belt would continue to separate Bingley from Keighley and Bradford. Some of the large allocations, such as Warren Lane, are permitted sites. Revocation of the permissions would be very costly.

Recommendation

3.2 **I recommend that no modification be made to the RDDP.**

Chapter 4 Urban Renaissance

SOM/S/UR5/1: Sty Lane, Micklethwaite (S/H2.10)

Objectors

560/11004	<i>Mr A B Parkin</i>
923/11428	<i>Mr & Mrs N Khan-Cheema</i>
1145/9198	<i>Mr Anthony Beale</i>
1380/9392	<i>Mrs Amanda Jane Gresswell</i>
1587/10912	<i>Mr Stephen Florence</i>
1621/11429	<i>Mr Geoff Feather</i>
1677/11430	<i>Mr D Reeday</i>
2288/2160	<i>Mr Hirst</i>
2290/2162	<i>Mrs Pat Hirst</i>
2481/9697	<i>Ms Katie Findlay</i>
2886/3223	<i>Mr R George</i>
3074/3191	<i>Mrs Jane P R Hall</i>
3106/11446	<i>Mrs Rosemary Hollins</i>
3138/3843	<i>Dr Michael Crawford</i>
3139/11217	<i>Ms Ann Parkinson</i>
3290/9540	<i>Mr John H G Holliss</i>
3291/9542	<i>Mrs M C Holliss</i>

Summary of Objections

- The UDP Inspector did not approve the site for housing.
- The allocation conflicts with national policy. The site is neither sustainable nor previously-developed land.
- Development would harm the landscape, listed buildings, archaeological remains, the Leeds-Liverpool Canal Conservation Area, and valuable ecological features.
- Development would lead to the coalescence of built-up areas and settlements along the side of the Aire Valley.
- Agricultural production would be harmed.
- The services and infrastructure locally, and in Bingley, would be further over-stretched.
- The roads in the vicinity are totally inadequate and dangerous.
- The road bridge carrying Micklethwaite Lane over the canal would not be able to carry the additional traffic which would result from a housing scheme.
- Bingley town centre would experience too much traffic.
- The housing allocation should be deleted and replaced by designation as urban greenspace.

Inspector's Reasoning and Conclusions

- 4.1 I have considered this site in relation to S/H2.10 below, where I conclude that the phase 2 housing allocation is appropriate.

Recommendation

- 4.2 **I recommend that no modification be made to the RDDP.**

S/UR7.1: Shipley/Saltaire Corridor

Objectors

1771/8931	<i>Heron Land Developments Ltd</i>
3494/10362/3	<i>Mrs Elizabeth Beadle</i>
3497/10364/5	<i>Mr Andrew Beadle</i>
3997/10366/7	<i>Mr John Pinder</i>
3999/10368/9	<i>Mrs Katherine Pinder</i>
4161/9285	<i>Marrtree Limited</i>
4251/10958/9	<i>Mr Robin Richards</i>
4267/10956/7	<i>Mr Tim Richards</i>
4517/9742/3	<i>Mrs Margaret Mary Casey</i>
4562/9752/3	<i>Mr Mark Wojtkow</i>
4563/9754 & 9758	<i>Mr A M Wojtkow (Snr)</i>
4564/9755 & 9759	<i>Mr A M Wojtkow (Jnr)</i>
4565/9756/7	<i>Miss C M Wojtkow</i>
4630/9787/8	<i>Mr Gerard Casey</i>

Summary of Objections

- The plan should give a clear indication that residential use on land at Brighton Street would be best located on the river frontage, with B1 use adjoining Hird Street.
- The requirements of the policies of the plan could render development of the site unviable.
- B8, C1 and showroom uses could also be appropriate on land at Briggate/Bradford Beck.
- The field should remain open to support urban wildlife, and as an amenity for residents of Jane Hills.

Inspector's Reasoning and Conclusions

- 4.3 The reference to an element of residential and commercial uses has been expanded in the RDDP to include the words "taking advantage of the river frontage". In my view it would be inappropriate to refer to specific sites in the RDDP but I consider that this is sufficient to guide the preparation of supplementary planning guidance or detailed site proposals.
- 4.4 The text relating to this mixed use area does not specify any particular requirements. One objector is concerned that the need for remedial contamination works, affordable housing and education provision, together with the need for a high standard of design to enhance the setting of adjoining listed buildings, could inhibit development. These matters will clearly be of concern in the preparation of detailed proposals for the area, and there may be a need for some flexibility in the application of policies in order to ensure that the objectives of Policy UR7 are achieved. However, this should be assessed in relation to specific proposals and I do not consider that it would be appropriate for the RDDP to indicate that there would be any general relaxation of policies.
- 4.5 The Council points out that small-scale B8 uses could be considered under Policy E7, and proposals for C1 and *sui generis* uses would be evaluated under other policies in the plan. As indicated above, I do not consider that it is appropriate to refer to uses of specific sites within the mixed use area, but the objectives of mixed use allocation should allow for the

consideration of a wide variety of uses even if they are not specifically referred to in the text.

- 4.6 The site referred to by local residents has now been granted planning permission for office development, and an objection requesting that it be retained as open space is dealt with later in this report. However, the mixed use allocation incorporates a range of uses, and it would not be inconsistent with the objectives of Policy UR7 for this to include open space use if this were considered appropriate in a particular location.

Recommendation

- 4.7 **I recommend that no modification be made to the RDDP.**

SOM/S/UR7/196: Coolgardie and The Auction Mart, Bingley (S/E1.7 & S/E1.8)

Objectors

2554/8399 *RPS*
2554/8393 *RPS*

Summary of Objections

- These sites should be combined and designated as a mixed use area rather than for employment, in order to provide for comprehensive mixed development of the land.

Inspector's Reasoning and Conclusions

- 4.8 This matter is considered in relation to S/E1.7 and S/E1.8 below, where I conclude that the sites are appropriately allocated for employment use.

Recommendation

- 4.9 **I recommend that no modification be made to the RDDP.**

SOM/S/UR7/374: Manywells Brow, Cullingworth (S/E1.12 & S/E1.13)

Objectors

4160/10699 *Mr Jonathon W Smith*
4166/10702 *M & B Commercial Properties Ltd*

Summary of Objections

- The employment allocation should be deleted and the land designated as a mixed use area under Policy UR7, and developed for educational, community and housing purposes.

Inspector's Reasoning and Conclusions

- 4.10 I have considered this matter in relation to S/E1.12 and S/E1.13 below, where I conclude that the land is appropriately allocated for employment use and that the proposed mixed use designation is unacceptable.

Recommendation

- 4.11 **I recommend that no modification be made to the RDDP.**

S/UR11.1: Bingley Town Centre

Objector

954/12863 *Government Office for Yorkshire and the Humber*

Summary of Objection

- Where land use proposals are put forward in a Proposals Report, there should be a policy to cover the proposals, and the areas should be identified on the Proposals Map.

Inspector's Reasoning and Conclusions

- 4.12 Policy UR11 has been deleted from the RDDP, and the explanatory text expanded to incorporate most of the wording of the policy. However, I have recommended that the policy be re-instated but amended to refer to the detailed proposals in the relevant constituency volume of the plan, and the need to have regard to the detailed planning guidance. This would appear to satisfy the objection by GOYH, and I see no need to modify this section of the RDDP.

Recommendation

- 4.13 **I recommend that no modification be made to the RDDP.**

SOM/S/UR11/196: Coolgardie and The Auction Mart, Bingley (S/E1.7 & S/E1.8)

Objectors

2554/8398 *RPS*
2554/8387 *RPS*

Summary of Objections

- These sites should be designated as an action area in order to provide for comprehensive mixed development, instead of being allocated for employment use.

Inspector's Reasoning and Conclusions

- 4.14 I have considered this matter in relation to S/E1.7 and S/E1.8 below, where I conclude that the sites are appropriately allocated for employment use.

Recommendation

4.15 **My recommendations are given under references S/E1.7 and S/E1.8 below.**

Chapter 5 Economy and Employment

S/E1.2: Former Tong Park First School, Otley Road/Centenary Road, Baildon (SOM/S/OS2/51)

Objectors

4177/3177 *Redrow Homes (Yorkshire) Ltd*
4295/4852 *Ms Annie Barker*

Summary of Objections

- The site should not be allocated for employment purposes.

Inspector's Reasoning and Conclusions

5.1 The FDDP employment allocation has been deleted in the RDDP, following the construction of a housing development on the site.

Recommendation

5.2 **I recommend that no modification be made to the RDDP.**

S/E1.3, SOM/S/OS1/174, SOM/S/OS2/174 & SOM/S/GB1/174: Buck Lane, Otley Road, Baildon

Objectors

2631/11065 *Mr & Mrs Stephen Dolby*
2803/6885 & *Bradford Urban Wildlife Group*
6840
4295/4850, *Ms Annie Barker*
6842 & 7109
4527/10491 *Mr John Dallas*

Summary of Objections

- The land should not be developed for employment but left open for the purposes of Green Belt, agriculture, open space and wildlife conservation.

Inspector's Reasoning and Conclusions

5.3 Most of the site is open, apart from an industrial use in the north-western section. It lies between Otley Road (A6038) and the River Aire, adjoining the main urban area. The RDDP Proposals Map shows the land nearest to the river as Green Belt, forming a continuation of a nature reserve alongside employment development to the south-west. The site is allocated for employment in the adopted UDP and planning permission exists for the construction of a factory and associated uses.

- 5.4 The great majority of the land is not previously-developed but greenfield. However, in my view the land is well-located in terms of road access and bus routes, is close to substantial areas of housing and adjoins existing employment development. It is relatively flat and considered to be one of the more advantageous sites for the attraction of new employment opportunities from in-coming companies or the expansion of existing businesses. It complies with the strategic emphasis of employment development within the Airedale Corridor and the 2020 Vision.
- 5.5 The evidence in relation to nature conservation and wildlife importance is not entirely consistent. However, it would appear that the greater part of the site, featuring improved grassland, is of limited ecological value other than the attraction of common bird species - this part of the land was not included in the survey by the Bradford Urban Wildlife Group. Of more significance is that section of the site towards the river. The allocation and the extant planning permission provide for an open space/Green Belt link from the open countryside to the existing nature reserve along the river valley, thus providing some protection for this part of the land. The hedges are not subject to protection and do not appear to be of major significance, and public rights of way across the site would be preserved.
- 5.6 Whilst the land is of good agricultural quality, the topography of the area is such that flat sites close to transport networks and centres of population, and thus important for employment uses, are generally in the river valleys where the better quality land is located. I am satisfied that no land of lower quality is available to accommodate the proposed employment use. I note that other land in the river valley has changed from agricultural use, including the adjacent nature reserve and the sports and recreational facilities further to the north-east.
- 5.7 I conclude, therefore, that the allocation of the land for employment purposes is necessary and appropriate.
- 5.8 On a related matter, the extant planning permission on the site includes very large areas of car parking. I consider that this feature does not sit comfortably with the Council's case for making the best use of employment land, or with the encouragement of means of transport other than the private car.

Recommendation

- 5.9 **I recommend that no modification be made to the RDDP.**

S/E1.4: Land West of Dowley Gap Lane, Dowley Gap, Bingley

Objectors

2803/8832 *Bradford Urban Wildlife Group*
3029/9499 *Mr Andrew Carey*
4328/8404 *Messrs J C & R H Smith*

Summary of Objections

- The land should not be developed but should be included in the Green Belt. this would provide an adequate buffer zone for the adjacent Bingley South Bog SSSI, and protect the nature conservation interest on the adjoining site S/E1.5.
- Employment development should not introduce any toxic or gaseous waste.
- In view of the shortage of available employment sites, the employment allocation should be extended to cover the area included in the adopted UDP.

Inspector's Reasoning and Conclusions

- 5.10 An area between the employment allocation and the SSSI is unallocated in the RDDP in order to provide a buffer zone, although this area is allocated for employment in the adopted UDP. Planning permission has been granted on part of site S/E1.5 for housing, including the conversion of the old mill buildings. It is anticipated that the landscaping of that approved development will ensure that the nature conservation interest is protected. In these circumstances I consider that a reasonable buffer zone and protection of nature conservation interests would be achieved.
- 5.11 The control of toxic or gaseous waste is a matter more appropriate for consideration at the stage of application for planning permission. The RDDP states that development will need to ensure that there is no adverse impact on the SSSI and the Leeds-Liverpool Canal Conservation Area that are close to the site. This should adequately ensure that such matters are considered.
- 5.12 I accept that good quality employment sites are in short supply in the District. The objection site is within the strategic development corridor, alongside the main railway line and close to the new road forming the Bingley Relief Road (A650). However, both of these routes are in a cutting adjacent to the site, with no availability for access, nor is there a junction with the A650 in close proximity. Indeed access is poor. From the north it is restricted by a very narrow bridge across the canal that permits only single file traffic and is limited to light vehicles. The new bridge (over the Relief Road) has improved matters to the south, but this route to the junction with Bradford Road has a number of fairly tight bends that inhibit access for large vehicles. The RDDP also states that development would be restricted to core employment uses.
- 5.13 I consider that these factors significantly reduce the development potential of the site for employment activities. The inclusion of the land allocated for employment in the adopted UDP would not provide any material improvement of the prospects for development, and would remove the necessary protection for the Bingley South Bog SSSI. Therefore, I conclude that the RDDP correctly excludes the buffer zone land from the employment allocation.
- 5.14 As I have indicated, the potential of the site for employment use is reduced by the poor access. It is also located away from the major residential areas and is not served by public transport. Hence it is a relatively unsustainable location, and adjoins mainly open uses including designated Green Belt. Against these factors must be weighed the need for employment sites in the area. On balance, I consider that the employment allocation should remain as the site could provide a suitable location for business uses that generate traffic limited in volume and size of vehicles.

Recommendation

5.15 **I recommend that no modification be made to the RDDP.**

S/E1.5, SOM/S/NE8/316 & SOM/S/NE9/316: Dowley Gap Works, off Dowley Gap Lane, Dowley Gap, Bingley

Objectors

2803/8831 *Bradford Urban Wildlife Group*
3029/9500 *Mr Andrew Carey*
4510/9623, *Mr A J Plumbe*
9628/9

Summary of Objections

- The site is required as a buffer zone for the SSSI and should not be allocated for development.
- Employment development of the site would harm its nature conservation interest.
- Employment development must not produce toxic or gaseous waste.

Inspector's Reasoning and Conclusions

5.16 The site adjoins S/E1.4 and links it to the Leeds-Liverpool Canal. I understand that planning permission has been granted for residential development on part of the site, including the conversion of the former mill buildings. This part of the site is included within the conservation area alongside the canal and adjoins the Bingley South Bog SSSI. I also understand that planning permission for employment development has been refused in the past because of poor vehicular access to the site. It is anticipated that the landscaping associated with the residential planning permission would encompass the area of nature conservation interest.

5.17 Taking all these circumstances into consideration, it would be sensible and logical to delete the employment allocation from that part of the site within the conservation area and leave it unallocated, thereby subject to RDDP Policy UR4. Thus the site would act as a buffer zone to the SSSI, and development in accordance with UR4, and having regard to the SSSI and the conservation area, would be acceptable. The remaining part of the site should be added to S/E1.4, through which access would be possible in order to overcome the previous highways objection to employment development on the site.

5.18 The subject of toxic and gaseous waste is more appropriately considered at planning application stage.

Recommendation

5.19 **I recommend that the RDDP be modified by the deletion of the employment allocation from that part of site S/E1.5 that is within the Leeds-Liverpool Canal Conservation Area, and the inclusion of the remainder of the site in S/E1.4.**

S/E1.6: John Escritt Road, Bingley

Objector

3029/9501 *Mr Andrew Carey*

Summary of Objection

- No toxic or gaseous waste should be permitted to arise from development of the site.

Inspector's Reasoning and Conclusions

5.20 The site forms the remaining undeveloped section of an existing industrial area, and is close to the Bingley South Bog SSSI and the Leeds-Liverpool Canal Conservation Area. Whilst the matters of toxic and gaseous wastes would properly be considered at planning application stage, the text relating to this site does not include reference to the environmentally sensitive location, unlike the wording relating to sites similarly located. I consider that this is an anomaly that should be corrected.

Recommendation

5.21 **I recommend that the RDDP be modified by adding the following to the description of site S/E1.6:**

Development will need to have regard to the nearby Bingley Bog SSSI and the Leeds-Liverpool Canal Conservation Area.

S/E1.7, SOM/S/UR7/127, SOM/S/H1/127, SOM/S/CR7/127 & SOM/S/TM7/127: Former Bingley Auction Mart, Keighley Road, Bingley

Objectors

2554/8396 *RPS*
3029/9502 *Mr Andrew Carey*
3766/5343, *Mr Bob Adsett*
5130 & 11053
4527/10493, *Mr John Dallas*
10563/4

Summary of Objections

- The employment allocation should be deleted and replaced with one of mixed use under Policy UR7 or action area under Policy UR11.
- The employment allocation should be replaced with housing or retail use.
- The site should be allocated for Park and Ride facilities together with car parking for Bingley town centre, and the current market use retained.
- Development of the site should not result in toxic or gaseous emissions or harm to the tourist attractions and views in the area.

Inspector's Reasoning and Conclusions

- 5.22 The site has been allocated for employment use for some years and it is argued that such development is not commercially viable. I note the evidence produced in relation to the forecast lack of viability of development for employment use. However, this assessment does not take account of the fact that the completion of the Bingley Relief Road will increase the strategic importance of the site and its development potential. The site is close to a junction with the new road, and traffic conditions along the existing frontage road are likely to improve significantly. I see merit in development of this site in association with the adjoining Coolgardie site, and this would be likely to increase its attractiveness as an employment development location.
- 5.23 As agreed by the objectors and the Council, the site is close to a railway station, high-frequency bus routes and the services and facilities of Bingley town centre. Such factors are equally important to employment use as to housing, and well-located employment sites are in short supply, especially in this area. Appropriate sites for housing are available in the RDDP.
- 5.24 In terms of retail development, the location of the site does not comply with national, regional or local policy advice and such development would be likely to detract from the existing Bingley town centre.
- 5.25 It is likely that Park and Ride facilities could be increased through proposals within Bingley town centre closer to the railway station. The site is too far away from the town centre to provide appropriate car parking facilities.
- 5.26 The determination of applications for planning permission on the site would be the appropriate mechanism for dealing with matters of toxic or gaseous emissions and impact on local tourist attractions and views. I have no reason to believe that these matters would not be adequately considered at that time.
- 5.27 Policy UR11 relating to action areas has been deleted from the RDDP, but I recommend elsewhere in my report that it should be reinstated. Nevertheless, in view of the need for well-located employment sites in this area I consider that designation as an action area is not appropriate. I conclude, therefore, that the site is correctly allocated for employment use, and is important to the overall strategy of the RDDP.
- 5.28 I conclude, therefore, that the site is appropriately allocated for employment use, and is important to the overall strategy of the RDDP.
- 5.29 I note that much of the site falls within the indicative flood plain and that development proposals would be subject to more detailed investigation of the flooding potential of the site. However, the extent of the indicative floodplain in this area is of questionable accuracy, and a revised estimate of the extent is to be produced. Hence, I do not consider that, at this stage, this is sufficient reason to exclude allocation of the land for employment use.

Recommendation

- 5.30 **I recommend that no modification be made to the RDDP.**

Objectors

462/1915 *Mrs B H Hanlon*
2554/8400 *RPS*
3029/9503 *Mr Andrew Carey*
3766/5344 & *Mr Bob Adsett*
11816
3828/8860/1 *Mrs M Waddington and Wilcon Homes*
4510/9624 & *Mr A J Plumbe*
9630

Summary of Objections

- The site should not be allocated for employment but for housing, urban greenspace, mixed use, or action area.
- Development of the site should not result in toxic or gaseous waste emissions, or harm the nearby tourist attractions and views.

Inspector’s Reasoning and Conclusions

- 5.31 The site lies between the existing main road and the railway, but the Bingley Relief Road now provides an attractive alternative route for through traffic. It is within the Strategic Development Corridor and well-located to provide employment sites attractive to incoming and expanding businesses and close to housing and the services and facilities of Bingley town centre.
- 5.32 I note that the site is allocated in the adopted UDP for housing, but with development delayed until completion of the Bingley Relief Road. It is accepted that it is in a sustainable location, close to local services and facilities, including public transport. However, such a location is equally applicable to employment use as well as housing. The topography of Bradford results in a shortage of good quality, strategic locations for employment sites. Allocation within a mixed use area or as an action area would also, in my view, be less desirable than employment because of the need for well located employment sites in this area.
- 5.33 In view of these considerations I conclude that it is necessary to retain the employment allocation on this site in order to provide opportunities for additional employment in the area. I note the concerns expressed in relation to drainage, traffic and the adequacy of local facilities but I have no compelling evidence to indicate that these are significant problems. The question of any effect on property values is not a relevant planning consideration.
- 5.34 In terms of its importance as an open space, the land does provide something of a contrast to the built-up areas around, but it does not provide expansive views nor represent a significant feature in the overall character and appearance of the area. I do not consider that its value as open space, including urban greenspace, is sufficient to outweigh its potential importance as an employment site.
- 5.35 I am satisfied that the usual process when considering applications for planning permission will take account of the impact of any proposals that might involve toxic or gaseous emissions, especially in view of the proximity of the site to residential areas, the

town centre and educational facilities. Similarly, any impact on nearby tourist facilities would be appropriately considered at that stage.

5.36 I note that part of the site is included within the indicative floodplain, and therefore may be subject to some restriction on development or to the preparation of adequate flood control and/or mitigation measures. However, the extent of the indicative floodplain in this location is of questionable accuracy. Further work is likely to result in amendment. In these circumstances I do not consider that this matter is sufficient at this time to affect the allocation for employment use.

Recommendation

5.37 **I recommend that no modification be made to the RDDP.**

S/E1.9: Castlefields Lane, Crossflatts

Objector

3065/3188 *Dr Oliver Phillips*

Summary of Objection

- Part of the site has been flooded in recent years and so development should be restricted to the area not subject to flooding.

Inspector's Reasoning and Conclusions

5.38 The Indicative Floodplain Map 2002 produced by the Environment Agency includes only a very small section of the site, and more accurate information will only be obtained when more detailed work is undertaken. It is accepted that part of the site was flooded in November 2000 and again in 2002. Nevertheless, the Strategic Floodplain Assessment undertaken for the Council states that the site is within the lower to medium flood risk area (zone 2 of Table 1 in PPG25). In this case employment development is acceptable on the land.

5.39 I note that outline planning permission was granted for office and industrial units in 1998, prior to the extensive flooding that took place in the area. I understand that at that time the Environment Agency raised no specific concerns relating to flooding, other than stating that finished floor levels should be at or above those of adjacent development. When the detailed planning application was considered earlier in 2003, the officer's report noted the position relating to the Indicative Floodplain Map and concluded that no flood risk assessment was needed.

5.40 This is not strictly in accordance with the advice in PPG25. In zone 2 areas flood risk assessment, appropriate to the scale and nature of the development and the risk, should be provided with applications or at the time of local plan allocations. Flood-resistant construction and suitable warning/evacuation procedures may be required.

5.41 The site is strategically well located for employment use, being adjacent to existing employment development, within the Strategic Development Corridor and close to public transport facilities, local services and housing areas. In addition, sites available for

employment development are limited due to the topography of the area and the constraints imposed by the Green Belt.

- 5.42 Taking all these matters into consideration, I conclude that, on the evidence currently available, the allocation of the land for employment use is acceptable. However, in view of the nature of the flood risk affecting part of the site, reference should be made to this in the text of S/E1.9. I suggest appropriate wording in my recommendation.

Recommendation

- 5.43 **I recommend that the RDDP be modified by the addition of the following text to S/E1.9:**

Part of the site has been subject to flooding in the past. Therefore, development should be guided by an appropriate flood risk assessment to clarify whether flood-resistant construction and suitable warning/evacuation procedures may be required.

S/E1.11, SOM/S/UR7/45 & SOM/S/H1/45:Main Street, Ling Bob, Wilsden

Objectors

*1749/7085 & 7 Mr S Walkden
2127/2794 & Wilsden Village Society
4503*

Summary of Objections

- The site should be allocated for housing or mixed use instead of employment.

Inspector's Reasoning and Conclusions

- 5.44 The site is within the built area of Wilsden, adjacent to other employment uses and housing, and is mainly within a conservation area. It has a frontage to Main Street but extends behind the adjoining employment use housed in a former mill building. There is a public sewer across the site and there may be some contamination arising from the previous industrial use. I understand that the land has been available for development for many years and fairly extensive marketing of the site resulted in no proposals for employment use, but significant levels of interest for housing. However, this exercise appears to have been completed in 2000 and I have no evidence of more recent efforts to market the land. The site is quite close to local services and facilities, but these are fairly limited and Wilsden is not classed as a well-located settlement. Therefore, it does not rank highly in the locational strategy for additional housing.

- 5.45 It is argued that Wilsden is unattractive to employment users, but there are a significant number of such users located in the area - some of them on fairly extensive sites. The constraints imposed by the sewer and the conservation area may deter interest in the land, but the site is not limited to core employment uses. Thus quite a wide range of activities would be acceptable within the employment use allocation. The maintenance and expansion of local employment opportunities is important to the development of sustainable communities.

5.46 In these circumstances it is my view that employment allocation should be retained so that the site can provide for new employment uses that would improve the sustainability of Wilsden.

Recommendation

5.47 **I recommend that no modification be made to the RDDP.**

S/E1.12, S/E1.13, SOM/S/NE9/177 & 178: Land adjacent to Manywells Quarry/Manywells Industrial Estate, Cullingworth

Objectors

4160/10698 & 10701 *Mr Jonathon W Smith*
4166/10704 & 5 *M & B Commercial Properties Ltd*
2803/12516 *Bradford Urban Wildlife Group*

Summary of Objections

- The land is neither required nor likely to be developed for employment use due to its location, poor access and unsuitability for modern employment activities. In any event the allocation is too large for a community the size of Cullingworth.
- There is a need for the expansion of secondary education and community facilities in Cullingworth and the site could provide for these, together with housing to contribute towards the funding of these facilities. Accordingly, the employment allocation should be deleted and replaced with education and community facilities, and housing.
- Part of the site has nature conservation interest and is designated as a wildlife area. The employment allocation should be deleted either in whole or in part and replaced with Green Belt or urban greenspace.

Inspector's Reasoning and Conclusions

5.48 The land lies to the rear of existing employment uses at Manywells Brow Industrial Estate and is separated from the main part of the settlement by the line of a disused railway. Site S/E1.13 is within the industrial estate whilst S/E1.12 lies to the east and includes former quarried land that has been filled in part. The RDDP indicates that access would be required via the existing estate roads.

5.49 Evidence presented to the Inquiry indicated that a marketing exercise relating to the allocated employment land and conducted in 2002 resulted in only 7 enquiries, none of which appear to have had any positive outcome. It was stated that the reasons for the lack of interest included the location away from main centres of population and the poor road communications, with the roads being "wholly unsuitable for anything other than the lightest of commercial vehicles". Conversely, the Council argues that the location is likely to prove more attractive as travel patterns adjust to people seeking shorter journeys to work and the use of alternative modes of transport. In addition, it is claimed that road access from the main routes has the advantage of not passing through Cullingworth or major settlements. Furthermore, my site inspection revealed that many of the existing uses on the Industrial Estate appear to operate large commercial vehicles, contrary to the assertion about the roads being suitable only for light goods vehicles.

- 5.50 I accept that the land is not of the highest quality nor in the most sought after location, and its allocation for employment purposes perhaps relates more to its history than its immediate future prospects of development. I also consider that developer interest may be reduced by the somewhat unprepossessing nature of the existing access, buildings and uses on the industrial estate. To bring the land "up-market" would require very significant capital investment that is clearly not commercially viable, certainly at present. It is likely that the land will continue to be attractive to only lower value uses, but there is an on-going requirement for sites to accommodate such necessary uses and the RDDP looks forward over a period of some 10 years or so.
- 5.51 I note the evidence that the existing buildings have a vacancy rate of about 25%, but again this may be more related to the form and nature of the buildings than the overall location. In terms of scale, I accept that the allocations are quite large in relation to the size of Cullingworth in its present function as a commuter settlement. However, national policy seeks to achieve a closer relationship between home and workplace and this requires that facilities be made available to develop local employment opportunities.
- 5.52 In relation to the local need for additional educational and community facilities, I note the conflicting evidence from the objectors and the Local Education Authority. Undoubtedly the recent performance of the school has increased demand for places as parental choice has been exercised. However, the school has recently been built in accordance with approved guidelines and there are sufficient places available as a whole within the schools in the locality to satisfy known demand now and in the foreseeable future. The LEA has a responsibility to manage and make the most effective use of the resources at its disposal, and this may at times conflict with the laudable aspirations of individual schools.
- 5.53 Even if it was accepted that expansion of the school was necessary the Council has stated that expansion on its existing site is possible, notwithstanding the adjacent Green Belt designation. It is not my role to consider internal school management procedures, and I note the somewhat novel method by which the proposed split site school would be operated. Nevertheless, there is recognition that operation of a split site school is not generally desirable and the proposed site is fairly remote from the existing school site.
- 5.54 Additional community facilities would undoubtedly be welcome in Cullingworth, helping to develop an increased sense of identity. The direct involvement of the school in community provision is beneficial to all concerned. However, I have no compelling evidence that this is a matter that would justify the proposal before me, nor that additional community facilities are dependent upon the expansion of the school on this site - which is rather remote from other local services and facilities.
- 5.55 Crucially, the proposed expansion of the school and community facilities on this site depends upon the allocation and development of part of the site for housing - and on the basis of the outline scheme submitted to the Inquiry, the greater part of the land. Such housing allocation would be contrary to national and regional policy guidance, and would conflict with the locational strategy of the RDDP.
- 5.56 Cullingworth is not part of an urban area nor classed as a well-located settlement in terms of public transport facilities. Apart from education, local services and facilities are fairly limited, and generally located well away from the objection site. Thus the site does not satisfy the criteria for sustainable development set out in PPG3. Whilst much of the site has been previously used for quarrying and related activity it has been largely restored

and now appears as part of the natural landscape. Therefore, it does not conform to the definition of previously-developed land included in PPG3.

- 5.57 Accordingly, housing development on this site would conflict with national policy guidance in PPG1, PPG3 and PPG13. It would also fail to comply with regional policy advice in RPG12 and would be contrary to the RDDP locational strategy. Housing development on this site is, therefore, unacceptable.
- 5.58 I conclude that the proposed allocation of the land for school and community facilities and housing is unacceptable.
- 5.59 Concerning the nature conservation interest on part of the land, the RDDP states that development here will need to take account of, and minimise any adverse impact on, the wildlife area. However, I have recommended elsewhere in my report that the Bradford Wildlife Areas should be shown on the Proposals Map. In this instance the wildlife site is defined as BWA/073 and forms the north-western section of site S/E1.12. I consider that employment development on the remainder of this site, and on S/E1.13, would not be significantly hampered by the exclusion of the wildlife site from the employment allocation, and the total developable area would not be reduced, having regard to the stated RDDP requirement indicated above.
- 5.60 I have given consideration to the need for additional employment land in the locality and whether the site should be designated as Green Belt or some form of open space, such as urban greenspace. In my view there is no immediate need for the whole of this land to be available for employment use, and perhaps not within the plan period, but there may well be a longer term need. Certainly it would be sensible to continue the employment allocation of site S/E1.13 as forming a part of the existing Industrial Estate. There are no exceptional circumstances sufficient to warrant Green Belt designation and I am not convinced that allocation as some form of open space is justified or reasonable.
- 5.61 Although not raised in any objection I have considered whether an alternative allocation as Safeguarded Land would be appropriate in these circumstances, or indeed that no specific allocation should be shown, thus making the land subject to policy UR4 of the RDDP. However, I am mindful of the importance of a positive allocation in view of the development potential and consequent value attached to the land. I conclude, therefore, that the employment allocation should be retained, except for that section of S/E1.12 designated as a Bradford Wildlife Area.

Recommendation

- 5.62 **I recommend that the RDDP be modified by the deletion of the employment use allocation from that part of S/E1.13 designated as a Bradford Wildlife Area.**

SOM/S/E1/207: Land west of Dowley Gap Lane, Bingley (adjacent to S/E1.4)

Objectors

4328/8403 *Messrs J C & R H Smith*

Summary of Objection

- In view of the shortage of employment land in strategic locations the land should be included within the employment allocation of site S/E1.4, as shown in the adopted UDP.

Inspector's Reasoning and Conclusions

5.63 I have considered this matter in relation to S/E1.4 above, where I conclude that the land should remain unallocated in the RDDP as a buffer zone for the adjacent Bingley South Bog SSSI.

Recommendation

5.64 **I recommend that no modification be made to the RDDP.**

S/E6.4 & SOM/S/H1/373: Canal Road

Objector

4204/10706/7 *Prospect Estates Ltd*

Summary of Objections

- The Employment Zone allocation (Policy E6) of the site should be removed and the site allocated for housing under Policy H1.

Inspector's Reasoning and Conclusions

5.65 The site forms the northern extremity of the Canal Road Employment Zone, and is occupied by an old mill building together with more recent single-storey attachments and open storage uses. The single-storey buildings are in use for employment purposes, but the upper floors of the mill building are vacant and in a poor state of repair.

5.66 The site is close to local services and facilities, including public transport, and adjoins a residential area and playing fields. It represents a sustainable location and presents an opportunity to reuse previously-developed land for housing, in accordance with national, regional and local policy guidance. Due to the physical characteristics of the site and the nature of nearby housing, a high-density scheme involving a variety of dwelling sizes would be appropriate. Allocation as a Policy H1 housing site would help achieve the target for brownfield housing development and reduce pressure for development of greenfield sites to meet the housing needs of the area.

5.67 At the Inquiry the Council's representative agreed that the land is visually and physically separate from the main part of the Canal Road Employment Zone, and that the character of the site, buildings and existing uses is significantly different to those of the Zone as a whole. I accept these views. The Council has also stated, in the Core Proof on the need for employment land (CD71), that there is an over-supply of traditional mill buildings that are largely vacant or seriously underused, and that, with a few notable exceptions, they have a depressing effect on the commercial property market due to their unsuitability for modern industrial requirements.

- 5.68 The Council argues that the site could be redeveloped for employment purposes and that, being in the strategic development corridor, it is a prime location to satisfy the needs of expanding and in-coming businesses. I accept that the site is in a sustainable location, close to local services and facilities including public transport, but such facilities are equally important for both employment and housing uses.
- 5.69 I consider that the admitted over-supply of such employment accommodation, together with its inadequacies to meet modern industrial needs, make its commercially viable use for employment unlikely. In addition, the availability of greenfield employment sites in better locations detracts from the prospect of employment redevelopment of the site. Furthermore, the site is separated from the main part of the employment area and adjoins residential properties that would restrict the range of employment activities that would be acceptable. Conversely, the proximity of other housing, local services and facilities are conducive to redevelopment for residential purposes.
- 5.70 Such redevelopment would result in the displacement of those employment uses that are on the site, contrary to the plan's intention of protecting existing employment. However, the Council accepts that re-use of the existing buildings for employment purposes is unlikely, and that future employment use would probably require redevelopment of the site. Thus, the existing uses would be displaced in any event. I note that there is land and buildings immediately to the north of Gaisby Lane described as an industrial site (although not allocated as such in the RDDP), and this includes vacant land where small industrial units could be developed.
- 5.71 In the light of all of these circumstances I consider that the objection site should be removed from the Employment Zone and allocated for housing under Policy H1.

Recommendation

- 5.72 **I recommend that the RDDP be modified by the deletion of the Employment Zone designation at the objection site, and its re-allocation for housing under Policy H1.**

Chapter 6 Housing

PARAGRAPH 6.0:

Objector

954/12861 *Government Office for Yorkshire and the Humber*

Summary of Objection

- It is difficult to understand how much greenfield land is being allocated because the constituency volumes do not contain this information for each site.

Inspector's Reasoning and Conclusions

6.1 In view of the importance of this information the site specific data in the constituency volumes should state whether each housing site is greenfield land or previously-developed land.

Recommendation

6.2 **I recommend the modification of the RDDP by the inclusion of information, for each housing site listed in the Shipley constituency volume, as to whether the site is a greenfield site or previously-developed land.**

S/H1.5, SOM/S/CF3/194 & SOM/S/OS2/194: Former Sandal First School, Green Road/Cliffe Avenue, Baildon

Objectors

932/8974 *Baildon Community Council*
1659/2240 *Mrs Sheila M Corby*
4295/7100 & *Ms Annie Barker*
8470/1
1343/8410 *Mrs Julia Donoghue*

Summary of Objections

- There is too much traffic congestion and too little recreational space/community facilities in Baildon.
- The school building should be preserved.

Inspector's Reasoning and Conclusions

6.3 At the time of writing the construction of the housing development is well advanced and the school building, which remains, has been listed.

Recommendation

6.4 I recommend that no modification be made to the RDDP.

S/H1.6: Ferniehurst Farm, Baildon Wood Court, Baildon (dealt with below)

Objectors

18/1267	<i>Christopher Leslie MP</i>
225/8219	<i>Mrs Lorraine Behrens</i>
310/8227	<i>Mr Michael Craine</i>
311/8240	<i>Mrs M M Craine</i>
386/8245	<i>Mr R S Freeman</i>
932/8975	<i>Baildon Community Council</i>
1025/8262	<i>Mr David Senior</i>
1343/9689	<i>Mrs Julia Donoghue</i>
1913/94	<i>Mr John Hyde</i>
3942/8363	<i>Mr G Barker</i>

S/H1.7: Valley View, Baildon (dealt with below)

Objectors

18/1269	<i>Christopher Leslie MP</i>
932/8976	<i>Baildon Community Council</i>

S/H1.6-1.8, SOM/S/CF3/182, SOM/S/CF3/202, SOM/S/OS1/182, SOM/S/OS1/202, SOM/S/OS2/182 & SOM/S/OS2/202: Ferniehurst Farm, Valley View, and Former Ferniehurst First School, Baildon (SOM/S/CF3/357)

Objectors

18/1270	<i>Christopher Leslie MP</i>
225/8221	<i>Mrs Lorraine Behrens</i>
310/8229, 8232/3	<i>Mr Michael Craine</i>
311/8241, 8243/4	<i>Mrs M M Craine</i>
386/8246, 8249/50	<i>Mr R S Freeman</i>
932/9682	<i>Baildon Community Council</i>
1025/8263, 10827/8	<i>Mr David Senior</i>
1343/9690	<i>Mrs Julia Donoghue</i>
3942/8364, 8369 & 8371	<i>Mr G Barker</i>
4295/4853 & 6877	<i>Ms Annie Barker</i>

Summary of Objections

- These 3 sites should not be allocated for housing because they would cause traffic problems, flooding, and a worse shortage of open space.

- The land should be used for a community building.
- The land should be retained as recreational land and not developed.
- The land should be kept as urban greenspace and not developed for housing.

Inspector's Reasoning and Conclusions

- 6.5 I consider these sites together because of their location adjacent to each other, the similarities between the objections, and the Council's desire to achieve a comprehensive development.
- 6.6 The sites would accommodate about 100 dwellings. I accept the Council's estimate that about 76 additional peak-hour motor vehicle trips would arise from the development. The estimate is based on comparisons with actual housing developments, and there is no significant evidence that car ownership would be substantially higher than the sample used in the TRICS database.
- 6.7 Not all of the traffic would be southbound, but a majority would be. Again an estimate of 50 additional trips in the peak hour for southbound traffic is reasonable. My opinion is that not all of the southbound trips would pass through the difficult junction of Green Lane with Otley Road. If the difficulties at this junction are as portrayed, I would expect some southbound drivers to use alternative routes. There are several roads leading from the Ferniehurst area to Baildon Road and thence to Otley Road. In my view the distance of the sites from the Green Lane junction, and the availability of alternative routes, mean that the development of the sites would not have a material impact on traffic danger and congestion. As for wider traffic considerations, the effects of the Bingley Relief Road are not yet known, and speculation about these effects is not a sufficient reason for refusing to allocate the land.
- 6.8 The Environment Agency has not objected to the allocation of these sites. The Agency would require any planning application to show how drainage would be organised. There are technical solutions to draining the land, such as retaining the water on site during storms and releasing it slowly thereafter.
- 6.9 Baildon as a whole is short of open space but the Ferniehurst area is not. In fact there is a sizeable area of open space north of the sites, and if more were needed to meet the needs of a housing development it could be provided within the sites. Alternatively, the open space needs of the new development could be provided for by investment in improving the existing open space to the north. It appears also that part of the former school site was used as incidental open space. The Council in fact proposes to replace this on land north of the old school, and there is a corresponding allocation on the Proposals Map. However, there is no mention of this in the description of the housing allocation in the constituency volume of the RDDP. There should be, as the replacement would be necessary because of the housing development, and the Council suggests a form of words to make up the deficiency in the plan and to bring matters up to date. I base my recommendation on this wording, with amendments to improve the sense.
- 6.10 I deal below with the question of community facilities. There is no realistic prospect that they would be provided on the land. It is my opinion that the need for such facilities in the area generally should not stand in the way of allocating these sites for housing. The concentration of development in urban areas is national policy, and I do not conclude that Baildon is being over-developed. There is not the detailed evidence to prove that material harm would arise from these allocations, such that they should be deleted.

- 6.11 I conclude that there is no reason why the allocations should not remain.
- 6.12 In the RDDP the sites are allocated to phase 2 and numbered S/H2.14, 2.15, and 2.16. All of the sites could be built out in phase 1. The sites were included in phase 1 in the FDDP, and all 3 sites are given a favourable assessment in the Council's sustainability appraisal. They were moved back to phase 2 because the bus service is not a 10-minute one and because of the hilly nature of the locality. Nevertheless, Shipley town centre is reasonably close and there is a 20-minute frequency bus service past the land. There is no school nearby but both primary and secondary schools are served by buses passing the objection land. Given also that part of the site is previously-developed land, I consider that a phase 1 allocation would be appropriate, bearing in mind that phase 1 cannot be completed using urban previously-developed land alone. The previously-developed land element of the objection sites places them, considered together, ahead of wholly greenfield sites in consideration against the sequential approach of regional guidance. The sustainability appraisal does not lead me to the conclusion that the sequence should be over-ridden.

Recommendation

- 6.13 I recommend that the RDDP be modified as follows:

[a] Shipley Constituency volume

Delete sites S/H2.14, 2.15, and 2.16 from the Policy H2 section and add them to the Policy H1 section.

Add wording to the reasoned justification for the former Ferniehurst First School site, so that the reasoned justification reads as follows: - "New housing site. Comprising vacant school land and buildings (now demolished) and identified for redevelopment as part of the Education Reorganisation. Brownfield site within the Baildon urban area. Incidental open space within the site has been rearranged and relocated to the north of the site. The relocated open space is identified as a recreation open space on the Proposals Map, and should be laid out as a recreation open space as part of the development of the site. Access via Valley View/Cliffe Lane West. Opportunities exist to develop the site comprehensively in conjunction with adjacent housing sites."

[b] Proposals Map

Delete sites S/H2.14, 2.15, and 2.16 and reallocate the sites as phase 1 sites.

S/H1.10: Warren Lane, Eldwick, Bingley (SOM/S/OS1/171.01 & SOM/S/GB1/171)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The housing allocation should be deleted and the site returned to the Green Belt. Development would remove the remaining open area providing separation of the settlements of Gilstead and Eldwick. Development of the site would also remove an important wildlife corridor, and would exacerbate existing problems relating to traffic, highway safety, and local facilities such as schools and health care.

Inspector's Reasoning and Conclusions

- 6.14 This is a large greenfield site between Eldwick and Gilstead. I note that the land is allocated in the adopted UDP for housing and the whole site has an extant outline planning permission for such development, with part of the site having full planning permission for affordable housing. The adopted development plan allocation and the outline planning permission preceded the publication of PPG3 in March 2000. Planning applications relating to the details of development of the site had been submitted but not determined at the time of the Inquiry into the Replacement UDP.
- 6.15 In these circumstances the deletion of the housing allocation in the RDDP would not prevent development of the site for housing, unless the Council was prepared to revoke the planning permissions. This would inevitably involve the payment of compensation, which would be likely to prove very expensive. Recommendation of revocation of planning permissions does not come within my role. In any event, given the Council's opposition to the objections, such action is unlikely. It may be that determination by the Council of the current (and any future) applications for planning permission can achieve some restriction of the area actually built upon. In the current circumstances I am unable to recommend any modification to the RDDP.
- 6.16 Purely for the purpose of calculating housing supply, I have assumed that the development of the site will be spread over both phase 1 and phase 2 of the plan period. This reflects the size of the site (13.59 hectares). I allow for half of the dwelling production in each phase.

Recommendation

- 6.17 **I recommend that no modification be made to the RDDP.**

S/H1.11: Warren Lane, Eldwick, Bingley

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The housing allocation should be deleted and the land returned to the Green Belt in order to maintain the separation of the settlements of Gilstead and Eldwick. Development would exacerbate existing problems relating to traffic, highway safety, and local services.

Inspector's Reasoning and Conclusions

6.18 The land is allocated in the adopted development plan for housing, full planning permission has been granted, and the development was substantially completed by the time of the Inquiry into the Replacement UDP.

6.19 In these circumstances I am unable to do other than recommend that no modification be made to the RDDP.

Recommendation

6.20 **I recommend that no modification be made to the RDDP.**

S/H1.12: Clarendon Road, Gilstead, Bingley (SOM/S/OS1/125, SOM/S/OS2/125 & SOM/S/NE9/125)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The housing allocation should be deleted and the land retained in open space use in view of problems associated with drainage, traffic, highway safety, local services and facilities, and the wildlife interest of the site.

Inspector's Reasoning and Conclusions

6.21 The land is allocated in the adopted UDP for housing and full planning permission, including an improved access, was granted in 2002. Conditions and legal agreements associated with the permission relate to, amongst other things, acceptable provision for drainage of the site. I have no compelling evidence to indicate that determination of the planning application did not comply with the requirements of Section 54A of the Town and Country Planning Act 1990, as amended, including the advice contained in PPG3 as a material consideration.

6.22 In these circumstances housing development on the site can take place in accordance with the planning permission unless the Council seeks to revoke that permission. As the Council opposes the objections I must conclude that this action is unlikely. Therefore, I have no option other than to accept that modification of the RDDP in line with the objections is not possible.

Recommendation

6.23 **I recommend that no modification be made to the RDDP.**

S/H1.13, S/H2.12, SOM/S/OS1/124 & SOM/S/GB1/124: Pendle Road, Gilstead, Bingley

Objectors

18/1266 *Christopher Leslie MP*
992/8153 *Mrs Ann Krol*
2608/9701-4 *Gilstead Village Society*
3935/3610, *Councillor David Heseltine*
11353/4
4996/12465 *Persimmon Homes (W Yorks) Ltd*
890/130077& *Ghyll Royd (Holdings) Ltd*
12296

Summary of Objections

- The land should not be developed for housing in view of its prominent skyline location and the problems of local services, facilities and infrastructure.
- The site should be designated as Green Belt or urban open space.
- The land should be allocated for housing under Policy H1 rather than H2.
- The supporting text should be amended as no waste has been deposited on the site.

Inspector's Reasoning and Conclusions

- 6.24 The site was allocated for housing under Policy H1 in the FDDP. The objections relating to the use of this land for housing were received at that stage. The RDDP amended the allocation to housing under Policy H2. This generated the objection requiring that it be allocated under Policy H1, as planning permission had been granted in 1976 for residential development, and a commencement had been made in accordance with that permission. Having examined this claim the Council agreed that implementation of the 1976 permission had been commenced, and in its proposed changes of January 2003 the Council has put forward amendments to the plan to include the site under Policy H1. The amended supporting text then gave rise to the objection from Ghyll Royd (Holdings) Ltd. on the basis that it is incorrect.
- 6.25 I must accept that the site has a valid planning permission for housing that can be acted upon. Only in the unlikely event of the Council revoking this permission would there be any point in removing the housing allocation. Accordingly, I am unable to agree to the proposals that the land be excluded from housing and allocated as open space or Green Belt. In the circumstances described, and in line with the reasoning in the RDDP, the site is correctly allocated for housing under Policy H1.
- 6.26 In terms of the wording of the supporting text, the Council now agrees that no waste tipping has taken place on the site and has suggested that the text be deleted from that put forward in the Council's proposed changes. The evidence before me supports the contention that no waste tipping has been authorised on the site, and thus the Council's suggested amendment should be accepted.
- 6.27 It has also been brought to my attention that the area allocated for housing in the RDDP does not equate to the area of the extant planning permission. Whilst the Council maintains that this would not preclude development of the land for housing, I consider that the Proposals Map should show the area of the 1976 planning permission for the

purposes of consistency, and to reflect the position with regard to Section 54A of the Town and Country Planning Act, 1990 (as amended).

Recommendation

6.28 **I recommend that no modification be made to the RDDP in terms of the allocation of the site for housing under Policy H1, but that the supporting text and Proposals Map be amended as follows:**

[a] S/H1.13 PENDLE ROAD, GILSTEAD 0.67

Housing site carried forward from the adopted UDP. Planning permission for housing was granted in 1976, and implementation of the development commenced. Any further planning applications for development of the site must take account of the exposed skyline location, access from Pendle Road and the informal footpath links within the site.

[b] The Proposals Map be amended to show the actual area covered by the 1976 planning permission.

S/H1.15: Stanley Street, Bingley (SOM/S/OS1/48 & SOM/S/OS2/48)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- This former children's play area is urban greenspace used for informal recreation and lock-up garages. It supports wildlife and protected trees, has difficult access for vehicles, and is crossed by well-used footpaths. Development would overlook existing houses and cause traffic congestion.

Inspector's Reasoning and Conclusions

- 6.29 Lock-up garages and hardstandings occupy the flatter parts of this site. The remainder of the land is overgrown. Because it is so small, unkempt and partly developed, I would not describe it as an urban greenspace. It is, on the other hand, previously-developed land in part.
- 6.30 The site is located within the urban area of Bingley and well placed for local services and facilities. In Policy H2 of RPG12 it falls partly within the first preference category of sites to be chosen for housing allocation.
- 6.31 It appears that play equipment was removed from the hardstandings many years ago. The land was not included as a recreation open space in the Council's 1998 audit of existing open spaces. There is informal recreational use of the land, presumably largely by children, bearing in mind the small size of the site and its partly steeply sloping nature. In my view this use is no more than would be expected of any partly open previously-developed land in an urban area. This use, and the lock-up garages, do not outweigh the need to find urban previously-developed land to meet the housing requirement. The area

is a high density housing neighbourhood, but the nearby Jer Wood is available for recreational use.

- 6.32 Other features of the site could be retained or replaced as part of any development proposal. I note in particular that the pedestrian routes follow the edges of the land and could be easily retained. Access could be provided directly from the Stanley Street frontage, and there is no evidence of traffic congestion in the residential streets here. Nor is there detailed or expert evidence of special wildlife value, but measures can be taken if necessary to prevent harm to bats. The design of a housing scheme could take account of the privacy of the occupants of dwellings around the site.

Recommendation

- 6.33 **I recommend that no modification be made to the RDDP.**

S/H1.17: Hazel Beck, Cottingley

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The proposal would cause traffic danger, and harm to wildlife.
- There are insufficient facilities to support the additional housing and population.
- The site is a greenfield site which should not be developed when recycled land is available.
- This long-established allocation should reflect the sustainable location of the land, its potential good access, and the need for greenfield land to be developed. The phasing should be returned to phase 1.

Inspector's Reasoning and Conclusions

- 6.34 The RDDP re-phases the site by delaying the release of the site until the second phase of housing land release.
- 6.35 The site is of very low priority for allocation, on the basis of the regional sequential approach to housing allocation. The objection land is a greenfield site. Cottingley is neither an urban area nor a settlement in a good quality public transport corridor: there is an 'arrive and go' bus service but most of the settlement is more than 400 metres from stops.
- 6.36 The site itself is within 400 metres of the bus service but from the point of view of social integration with the settlement, and of sustaining local services, the land is poorly placed on the periphery of Cottingley. Thus, for example, although there is a secondary school nearby the village centre is distant. Bingley town centre is about 1.3km away but Bradford Road is busy and noisy for pedestrians. In my view the opening of the Bingley Relief Road will not make the roadside walk pleasant. Residents of a new housing scheme on the objection land would not be encouraged to walk to facilities. In my opinion, there is no overriding reason based on sustainability or other considerations for releasing the site for housing at all during the period of the plan's housing phases.

- 6.37 Access to the area within which the site is located is via Beckfoot Lane. This road has a junction with Bradford Road. At this junction visibility in both directions is substandard (4.5m x 75m, instead of 4.5m x 90m). The accident rate is less than one would expect for a junction with the traffic flows experienced here, but the Council says that it would be undesirable to put additional traffic through the junction in present circumstances. It is possible that in future the problems could be overcome. Visibility to the left could be improved by lowering the parapet of Cottingley Bridge; the parapet falls within highway land. Traffic flows on the main road should decrease significantly with the opening of the Bingley Relief Road, and this should solve the material traffic congestion difficulties experienced by local residents. However, there is as yet no guarantee that satisfactory visibility could be provided in both directions, and this is a contributory reason leading to my overall conclusion that the land should not be allocated for housing. There is a need for more housing land to be found, but this is outweighed by the sustainability and traffic visibility objections to allocation in this case.
- 6.38 Other reasons advanced by objectors are not persuasive. The Hazel Beck wildlife corridor is not dependent on this site. The main corridors are probably centred on Hazel Beck itself to the south and on the Aire valley. Animals are also able to use the large area of open land to the west to gain access to the Aire valley. The Council has found no evidence of badgers except possibly in the form of runs near the southern edge of the site. My opinion is that, if badgers use the site, that use could be accommodated in any development.
- 6.39 Flooding takes place along Hazel Beck and on the adjacent field. There is no evidence of flooding on the objection land, and the part of the site nearest the beck rises above the level of the stream. The Environment Agency has made no objection to the allocation. There are a number of options for draining the site itself.
- 6.40 The site is not within the adjoining Special Landscape Area as delineated in the adopted UDP. I do not consider that the development of the site would harm the landscape or any other feature of nearby land. Nor is disturbance from construction, or residential traffic, a justification for not allocating the land. As for pressure on local services, my view is that the site is too small for its development to cause a significant worsening in conditions in this respect. Nevertheless, although I do not agree with many of the arguments advanced by objectors, my overall conclusion is that the land should not be allocated for housing.

Recommendation

- 6.41 **I recommend that the RDDP be modified by the deletion of the housing allocation at Hazel Beck, Cottingley.**

S/H1.19 & SOM/S/OS6/305: Cottingley Moor Road, Cottingley

Objector

2804/8933 & Mrs Valerie Shepherd
9011

Summary of Objections

- The housing allocation should be deleted and the land retained in open space use, particularly in view of its nature conservation and historic interest.

Inspector's Reasoning and Conclusions

- 6.42 The land is allocated in the adopted UDP for housing and outline planning permission was issued in September 2000, following completion of a Section 106 agreement that, amongst other things, provides for open space, a children's play area and woodland management. The decision to grant planning permission was made in December 1998, subject to the signing of the Section 106 agreement, prior to the publication of PPG3. Subsequently full planning permission for phase 1 (the land to the south-east of Cottingley Beck) was granted in October 2002 and at the time of the Inquiry into the Replacement UDP an application for phase 2 was awaiting determination.
- 6.43 I have no compelling evidence to indicate that these decisions were not made in accordance with Section 54A of the Town and Country Planning Act 1990, as amended. Thus modification to the RDDP would have no effect on the approved developments.
- 6.44 I note that the areas agreed for housing development exclude the wooded area alongside the beck, thus providing some protection for the main features of nature conservation and historic interest.

Recommendation

- 6.45 **I recommend that no modification be made to the RDDP.**

S/H1.24 & SOM/S/CF3/314: Former Eldwick First School, Otley Road/Lyndale Road, Eldwick, Bingley

Objectors

992/8151 *Mrs Ann Krol*
3096/11370 & *Mrs Ann May*
8296
4527/9639/40 *Mr John Dallas*

Summary of Objections

- The site should not be developed for housing as it would result in additional traffic congestion and harm to the safety of road users, would over-stretch local services and facilities and remove part of the last remaining green areas.
- The land should be used for community facilities, preferably retaining the original school building.
- If housing is permitted it should require the retention and conversion of the original school building.

Inspector's Reasoning and Conclusions

- 6.46 Since the RDDP was produced, planning permission has been granted for the conversion of the original school building into 3 dwellings (January 2002) and the erection of 7 new houses on the remainder of the site (March 2002). At the time of my site inspection I noted that these developments were substantially completed.
- 6.47 Conditions on the planning permissions required access to be from Lyndale Road instead of Otley Road, the main road frontage. The existing access to this latter road was required to be removed, and improvements to the junction of these 2 roads undertaken. These actions were designed to reduce any problems of traffic congestion and highway safety. I have no compelling evidence to show that the housing development, in this location and at the scale approved, would result in unreasonable demands on the local services and facilities.
- 6.48 Whilst the site and/or buildings may have been useful for community facilities they are not particularly centrally located to serve the majority of the population in the area. Again, no convincing evidence has been presented to justify such a use, and in any event the site has now been developed for residential purposes. This development has included the retention and conversion of the original school buildings, so that at least that part of the objections has been satisfactorily resolved.

Recommendation

- 6.49 **I recommend that no modification be made to the RDDP.**

S/H1.26, SOM/S/TM7/348 & SOM/S/OS2/348: Former Burley Church of England School, Aireville Terrace, Burley in Wharfedale, Ilkley

Objector

*1422/9693/4 & Mr E R Orme
10845*

Summary of Objections

- The site should be used for car parking together with open space as there is already too much housing growth in the settlement, making it a dormitory location and creating a divided community.

Inspector's Reasoning and Conclusions

- 6.50 Since the production of the FDDP, planning permission for the conversion of the main school building to residential use, together with the construction of new dwellings on the remainder of the site, has been granted. At the time of my site inspection I observed that this development had been substantially completed.
- 6.51 In these circumstances the objections have been overtaken by events. Furthermore, I have no compelling evidence to substantiate the need for additional car parking and open space in the area, and I note that the Ilkley Parish Council raised no objection to the allocation, nor highlighted any concern in terms of the changing character of the

settlement. Burley is correctly classified as a well-located settlement in the RDDP, and the site satisfies the criteria in PPG3 in that it is previously-developed land close to a range of local services and facilities. Accordingly, the allocation under Policy H1 is in line with national, regional and local policy guidance.

Recommendation

6.52 I recommend that no modification be made to the RDDP.

SOM/S/H1/51: Former Tong Park First School, Baildon (S/E1.2)

Objector

4177/11045 *Redrow Homes (Yorkshire) Ltd*

Summary of Objection

- The site should be allocated for housing, not employment.

Inspector's Reasoning and Conclusions

6.53 Allocation for either purpose is inappropriate, following the completion of a housing development, and the RDDP makes no allocation.

Recommendation

6.54 I recommend that no modification be made to the RDDP.

SOM/S/H1/121 & SOM/S/GB1/121: Derry Hill, Menston

Objector

799/9677 & 8213 *David Wilson Homes*

Summary of Objections

- Insufficient land is allocated to meet the housing requirement. Derry Hill is close to services and its development would not conflict with Green Belt purposes.

Inspector's Reasoning and Conclusions

6.55 I approach this objection in different circumstances from those obtaining when previous Inspectors considered the land. Menston is a settlement in a good quality public transport corridor. I have no particular evidence of a local need affecting Menston, and I note the proposed large-scale development just over the boundary with Leeds District. However, I have already concluded that land for housing will have to be allocated in settlements like Menston in order to meet the housing requirement over the totality of the plan period. The objection land is within the Green Belt but, again, I have concluded that there are

- exceptional circumstances favouring changes to the extent of the Green Belt in the District.
- 6.56 In the past the local planning authority did at one stage support the exclusion of part of the objection land from the Green Belt.
- 6.57 The eastern end of the objection site is tucked into the angle of the development on Derry Hill and to the south of Main Street. With the dwellings at Hillside Court to the south, this part of the site has development on 2 sides and part of a third. The Council acknowledges that the Green Belt function of the eastern field is not an overriding consideration, and I conclude that this field could be released from the Green Belt without harming its strategic function.
- 6.58 The objection site extends considerably further to the west, but no further than the western edge of the continuously built-up area of the settlement, on the north side of Moor Lane. The southern limit of development is already set by Hillside Court.
- 6.59 Landform would also assist in containing development on this side of Menston. The site rises beyond the stream dividing the eastern field from the rest of the land, and the western section of the site is the highest part. Nevertheless, the land south and south-west of the site rises generally more steeply, in my judgement, and to higher levels. The difference in the angle of slope has been reinforced by the planting, since the previous Inquiry, of a tree belt on the edge of the site.
- 6.60 The Council is concerned that the development of the land would join the main built-up area of Menston to the sporadic ribbon of houses along the south side of Moor Lane west of the site. In fact there would be a gap between the western edge of housing on the site and the first house on the south side of Moor Lane. There is also an open break between this house and the next.
- 6.61 As far as the purposes of the Green Belt are concerned, there would be some encroachment onto the countryside on this side of Menston, but the higher land outside the site would restrict the potential for the settlement to sprawl or merge with other settlements. This, and the existing development at Hillside Court, would serve to contain the spread of development. The higher land would constitute a barrier to the further growth of Menston in this direction. The tree belt and the edge of development would together provide a firm boundary to the Green Belt.
- 6.62 The Council does not take issue with the sustainability of the site, once the need for more housing land is established. I note that Menston has a variety of services and has its own station on the Ilkley-Leeds/Bradford railway line. Certainly I see no significant evidence that the site is so unsustainable that it should not be allocated at all for housing. On the other hand, I consider that there is not sufficient justification for a phase 1 allocation. Menston is by no means a first choice settlement for early development, and the principal sites against which the objector compares the objection land for sustainability purposes are all sites which I conclude should not be allocated, or should be allocated for phase 2 housing.
- 6.63 Looking at the individual facilities available in Menston, lower level services are not lacking, but Menston is not, for example, a district centre, nor are there significant employment opportunities in the settlement. This is a contributory factor to Menston's relatively lowly position in the sequential approach to housing allocation, and to my

conclusion that the objection site is not so sustainable as to warrant inclusion in housing phase 1. Of course, the site is also greenfield land, and I need to avoid recommending the unnecessary allocation of greenfield land to meet the phase 1 requirement.

6.64 Overall, I conclude that this site should be allocated for housing, but in phase 2, not phase 1. It would therefore become available later than the High Royds development in Guiseley. The dwelling capacity of the objection site is about 150, on the basis of the objector's unchallenged Inquiry evidence. I use this figure only to enable me to make an assessment of the overall dwelling capacity of phase 2 sites as a whole.

Recommendation

6.65 **I recommend that the RDDP be modified by the deletion of the objection site at Derry Hill, Menston, from the Green Belt, and by the site's allocation as a phase 2 housing site.**

SOM/S/H1/122.01, SOM/S/H2/122.01, SOM/S/UR5/122.01, SOM/S/GB1/122.01 & SOM/S/NE3/122.01: Land at Bradford Road, Menston

Objector

3839/8228, *Bryant Homes Northern Ltd*
8230, 8236, 8238/9

Summary of Objections

- In circumstances where insufficient housing and safeguarded land has been allocated, it would do no harm to the Green Belt to take this sustainable site out of the Green Belt and to allocate it for housing.

Inspector's Reasoning and Conclusions

Green Belt

6.66 Menston is a settlement in a good quality public transport corridor. I have already concluded that land for housing will have to be allocated in settlements like Menston in order to meet the housing requirement over the totality of the plan period. The objection land is within the Green Belt but, again, I have concluded that there are exceptional circumstances favouring changes to the extent of the Green Belt in the district.

6.67 However, Bradford Road and Otley Road, forming the western boundary of this objection site, also form an excellent Green Belt boundary. Together they are long, relatively straight, and prominent physical features. Apart from scattered houses, the land to the east is open, whereas that to the west is occupied by the housing areas and ancillary uses of the settlement of Menston. The objection land is on a slope leading down to the Mire Beck and Gill Beck. This land is well seen as a forward slope from public footpaths on higher ground further east. The encroachment of development onto countryside east of the present firm Green Belt boundary on this side of Menston would be obvious both from the main roads and from locations east of the site. The site area measures some 8.26 hectares; the loss of this amount of countryside would be substantial. Furthermore, this is

an attractive piece of countryside because of its open character and the trees on parts of the site.

- 6.68 The becks could serve as a new Green Belt boundary, although in my judgement they would not be as strong a boundary as the roads. Although the land further east is steeper than that on the objection site, my opinion is that the becks would not necessarily act as very long-term limits on the expansion of Menston. It seems to me that, using features like landform, existing buildings, and tracks that in some cases connect groups of buildings, persuasive arguments could be advanced for incremental encroachment on the Green Belt beyond Mires Beck. My conclusion is that it is the roads and the openness of the objection site which prevent the uncontrolled sprawl of Menston.
- 6.69 The objection land also plays its part in separating Menston from Otley. Although the higher land of Otley Chevin is a prominent element in the separation, the lower land west of the becks is part of the land which, as a whole, lies between the 2 settlements.
- 6.70 My conclusion overall on the Green Belt issue is that the objection site fulfils 3 of the purposes of including land in the Green Belt, related to checking unrestricted sprawl, preventing neighbouring towns from merging, and safeguarding the countryside surrounding Menston from encroachment. The site's contribution in fulfilling these functions is a very weighty consideration.

Other Matters

- 6.71 For the objector, it is argued that the site's sustainability, affordable housing potential, and efficient use for housing generally, all improve its position compared with other sites.
- 6.72 The land is close to Menston station and the facilities the settlement offers, and to bus services, but the busy A65 separates it from most of what is available. Even a bus journey along the A65 bus corridor requires a crossing of the road to be made, if the journey is 2-way. As a result, I conclude that the relative sustainability of the land does not override its lowly position in the sequential approach to selecting housing allocations.
- 6.73 In fact the site has access difficulties. Access to the very busy Bradford Road has not been investigated, and there are levels and other problems in providing such an access. An Otley Road access is feasible, but the roundabout at the Otley Road/Bradford Road junction experiences peak hour queuing, which would be worsened by development of the objection site. Although the Council does not pursue this point, I have no evidence that the roundabout could be improved so as to prevent a significant impact on the flow of traffic on the A65. This road is of strategic importance, and delays would also be likely to affect buses using the Priority Bus Network.
- 6.74 My overall conclusion with regard to these objections is that the site's Green Belt function is too important to warrant deletion of the land from the Green Belt, even given the housing potential of the site and its sustainability. Principally for this reason, the site should not be allocated for housing or as safeguarded land.

Recommendation

- 6.75 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/123 & SOM/S/GB1/123: Glenview Drive, Shipley

Objector

906/10790 & *Mr Gordon Firth*
8141

Summary of Objections

- The land should be removed from the Green Belt and allocated for housing as it does not serve the functions or purposes of the Green Belt and housing development would represent the rounding-off of the urban area.

Inspector's Reasoning and Conclusions

- 6.76 The site is essentially surrounded on three sides by residential properties and has been subject to trespass, vandalism and deposition of rubbish so that it is claimed agricultural use is no longer viable.
- 6.77 However, the site slopes significantly up from the north and north-west forming a prominent hillside clearly visible from Cottingley and its surroundings. Thus development here would be seen to represent urban sprawl encroaching on the countryside, and would threaten coalescence with Cottingley. It would also weaken efforts to re-use previously-developed land in the urban area. Thus development would be significantly contrary to the functions and purposes of the Green Belt as set out in PPG2, and contrary to the advice in PPG3. I accept that development in the northernmost section of the site would be less prominent. Nevertheless, it would still have a significant impact on the openness of the Green Belt, which is its main feature.
- 6.78 It is suggested that development would take the form of "affordable low cost senior citizens' sheltered accommodation". However, such level of detail is not appropriate at the development plan stage, and in any event the site is not close to the local services and facilities that occupants of such accommodation would require. The steep gradients of the surrounding road network add to these disadvantages. Whilst the site adjoins the main urban area, it is not previously-developed land nor, as I have already indicated, close to local services and facilities, including high quality public transport. Therefore, it does not meet the criteria set out in PPG3.
- 6.79 I noted on my site visit that fences along the boundaries with Glenfield Drive and Bankfield Road had been recently replaced and appeared to be effective in reducing trespass, vandalism and rubbish dumping. The site contains and is bounded by many fine, mature trees (many of which are included within a Tree Preservation Order) and has some local nature conservation interest as well as providing a most attractive backdrop to the neighbouring dwellings. Development would remove these elements of the character and appearance of the area.
- 6.80 Many expressions of support for the Green Belt allocation have been lodged, especially by local residents. I generally concur with their views.

Recommendation

- 6.81 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/180 & SOM/S/GB1/180: Former Milnerfield Kitchen Garden, Primrose Lane, Gilstead

Objector

2786/6843 & *Kingsbridge Directors Pension Scheme*
6845

Summary of Objections

- The site should be deleted from the Green Belt and allocated for housing under Policy H1 of the RDDP.

Inspector's Reasoning and Conclusions

- 6.82 It has been argued that development of the site would not affect the Green Belt as the land is visually and physically related to the settlement of Gilstead rather than the remainder of the Green Belt. The western boundary is formed by a high stone wall fronting onto Primrose Lane, beyond which are residential properties in Gilstead. This wall conceals the site from Primrose Lane and, together with the woodland, prevents ground level views of the land beyond. The northern and eastern boundaries are marked by generally lower walls and a public right of way runs within the site near to these boundaries. From this there are clear views of much of the site and I consider that it is closely related in character to the rest of the Green Belt to the north and east. The southern boundary follows the line of an unmade track that was the access to Milnerfield House and through the grounds to Saltaire via Higher Coach Road. Much of the site is screened to views from the south by the woodland but is closely related to the character of the Green Belt in this location.
- 6.83 The Green Belt boundary is marked by Primrose Lane and this constitutes a very well defined limit to this part of Gilstead. In my view the high wall fronting onto this road is a dividing line rather than a unifying feature, so that the grounds of Milnerfield, including the objection site, are neither visually nor physically part of the settlement. In addition, the functions of the Green Belt are not just visual - the sense of separation, of Gilstead from Baildon, and the prevention of the sprawl of Gilstead, are at least as important, as is the requirement to have clearly defined and defensible boundaries.
- 6.84 PPG2 makes it clear that alteration to the extent of the Green Belt should only be undertaken in exceptional circumstances. Such circumstances do exist in Bradford District, although there are no site-specific reasons which would suggest change to the Green Belt. Rather, the Green Belt function of the site is such that the land should not be removed from the Green Belt.
- 6.85 There are other sites within urban areas sufficient to make up the phase 1 housing requirement. The objection site would be an extension to the urban area and therefore lower down the hierarchy of the sequential approach.
- 6.86 Whilst I accept that the objection site is relatively close to a range of local services and facilities, these are neither particularly comprehensive nor readily accessible. In addition, the available public transport services are not of high quality, as defined by the RDDP. Part of the site was previously occupied by buildings and structures, but these have now virtually disappeared and/or become absorbed into the landscape so that clear signs of

previous development are very limited. In these circumstances I do not consider that the site qualifies as previously-developed land as defined in PPG3.

- 6.87 Therefore, I conclude that there are no exceptional circumstances sufficient to warrant removing the Green Belt designation from the objection site. In addition, the site does not satisfy the advice and criteria set out in PPG3, nor comply with regional and local policy guidance in terms of the locational strategy and sequential identification of housing sites.
- 6.88 I note that the land is subject to Policy BH17 (Parks and Gardens recognised as of Local Value) and is also a Bradford Wildlife Area. These matters also count against the allocation of the site for housing development.
- 6.89 I conclude, therefore, that deletion of the site from the Green Belt is not warranted, and allocation for housing would be inappropriate.

Recommendation

- 6.90 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/187, SOM/S/UR5/187, SOM/S/H2/187 & SOM/S/GB1/187: Land at Cottingley Moor, Cottingley

Objector

4177/8458, *Redrow Homes (Yorkshire) Ltd*
8460, 8462
& 8464

Summary of Objections

- The land should be deleted from the Green Belt and allocated for housing or as safeguarded land under Policy UR5.

Inspector's Reasoning and Conclusions

- 6.91 The land forms an area of some 76 hectares of generally open countryside to the south-west of Cottingley. It is mainly on rising ground stretching from the current development limit of the settlement to Lee Lane, where there is a line of ribbon development along part of the south-western side of the road.
- 6.92 I do not consider that Cottingley is part of any urban area: the Green Belt separates it from Bingley and Shipley. Nor is it within a good quality public transport corridor. Although there are a number of bus routes they do not include high-frequency services. Whilst the RDDP includes proposals for improvements to some of these this is not sufficient in itself to change the status of the area. The objection site is not close to the Aire Valley bus routes.
- 6.93 In terms of the Green Belt, I consider that the land forms an essential part of the open countryside that separates Cottingley from Wilsden and Sandy Lane. Much of the land is prominent in views from the surrounding area, and particularly from Cottingley itself to

which it forms an important physical and visual backdrop. The land immediately to the rear of much of March Cote Lane forms a prominent ridge. The proposal would result in development spilling over this important visual and physical feature, dominating the existing housing and intruding into the surrounding countryside. Development in this location would significantly lead to the coalescence of these separate settlements. In my experience there are few proposals that would be more appropriately described as urban sprawl, and it would involve a major encroachment into the open countryside. Furthermore, the location and scale of the proposal would seriously hinder the urban regeneration of the area as a whole.

- 6.94 With regard to sustainable development, I accept that the site may be large enough to provide a variety of activities and uses. However, such development form is low in the priorities of the regional and local locational strategies for development. Whilst the local services and facilities are fairly close to at least part of the site, such services and facilities are somewhat limited - as indeed evidenced by the proposals to provide additional ones. Thus the proposal would not be based on the use of existing facilities. The scale of the proposal - indicated as some 1500 - 2000 dwellings - would be likely to at least double the existing population of Cottingley.
- 6.95 I conclude, therefore, that the site is important to the functions and purposes of the Green Belt and that there is no justification for the proposal, either as a housing allocation or as safeguarded land.

Recommendation

- 6.96 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/193.01, SOM/S/UR5/193.01 & SOM/S/GB1/193.01: Endor Crescent, Burley in Wharfedale

Objector

4128/9281-3 *Mr P Todd*

Summary of Objections

- This site is better related to the built-up area than to the Green Belt and does not perform a Green Belt function.
- The former railway line to the south provides a better Green Belt boundary than the garden fences and hedges, which form the present boundary.
- This land is suitable and available for development. It should be allocated for housing or, failing that, for safeguarding.

Inspector's Reasoning and Conclusions

- 6.97 Contrary to what is said on behalf of the objector, the site is open land. It is also part of the adopted Green Belt, but given the need for additional housing and safeguarded land it is, in the circumstances of this site, appropriate to review its inclusion in the Green Belt. The site is relatively small and is sandwiched between existing housing and the trees marking the course of the old railway line to the south. The busy Bradford Road constitutes the eastern boundary, and the site slopes up to the old railway embankment.

Taking into account the maturity and density of the vegetation along the embankment now, I consider, contrary to the view expressed by the previous UDP Inspector, that the site relates more to the built-up area of Burley than it does to the countryside between that settlement and Menston. Looking across the land from the main road, it is not possible to see beyond the embankment trees to the countryside beyond.

- 6.98 The road and former railway line are closely juxtaposed and meet at the southern point of the site. They would provide firmer boundaries to the Green Belt than the garden boundaries do.
- 6.99 In the context of a review of the Green Belt, my opinion is that the land should not be included in the Green Belt.
- 6.100 Burley offers the potential for sustainable development, although this site is located at the southernmost extent of the settlement, some distance from the station and facilities.
- 6.101 There is a need for additional land to be allocated for housing, but there is no readily available safe access point for a housing development here. The site is land-locked to the north by the houses fronting onto Endor Crescent. There is insufficient frontage to provide an access with the necessary visibility splays onto Bradford Road. Consequently the land should not be allocated for housing at this stage, but it should be shown as safeguarded land on the Proposals Map. It is possible that the access problem might be capable of solution in the longer term.

Recommendation

- 6.102 **I recommend that the RDDP be modified by the deletion from the Green Belt of this objection site at Endor Crescent, Burley in Wharfedale, and by the allocation of the site as safeguarded land under the terms of Policy UR5.**

SOM/S/H1/201.01 & SOM/S/GB1/201.01: Land at Chelston House, Wilsden Road, Harden

Objectors

4158/8386 & 8388

Mr and Mrs Ruffell

Summary of Objections

- The site should be deleted from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

- 6.103 The site adjoins the built-up area of Harden and was shown within the Green Belt and Special Landscape Area (SLA) in the Lower Airedale Local Plan. However, in the draft of the adopted UDP the site and adjacent land were excluded from the Green Belt and the SLA and shown as "protected open land". This effectively indicated that the site would be considered favourably for development when sites allocated had largely been developed - similar to safeguarded land in the current RDDP. It is contended, therefore, that the Council must have considered that development of the site, and a much larger adjoining area of land, was acceptable despite being included within the Green Belt.

- 6.104 In addition, planning permission has been granted for housing on adjacent land to the north and south-east, including a small part of the Green Belt.
- 6.105 I understand that, if the Green Belt allocation is removed, it would be the intention of the objectors to sell the site, together with Chelston House and the land that has planning permission for a dwelling, as a single unit for residential development. Whilst the site adjoins Chelston House and is in the same ownership it is not within the curtilage of that property, and therefore is not classified as previously-developed land.
- 6.106 Harden has some local services and facilities but these are very limited, particularly with regard to retail and employment uses. It is not part of the urban area, nor is it located within a defined transport corridor. The evidence of local housing need is essentially anecdotal, and recent residential development within the settlement has provided additional accommodation of varying forms, types and sizes.
- 6.107 The objection site is clearly part of the open countryside between Harden and Wilsden. Development would represent a significant urban sprawl encroachment into the countryside that would materially reduce the openness of the Green Belt and the separation of the two settlements. Whilst previously the Council has proposed the deletion of the Green Belt allocation, national, regional and local policy relating to the location of housing has fundamentally changed since that time. In terms of the sequential approach set out in Policy H2 of RPG12, this site, even if not in the Green Belt, would be the last category of acceptability.
- 6.108 In the light of all of these circumstances I conclude that removal of the site from the Green Belt and allocation for development, or even as safeguarded land, is neither justified nor acceptable.

Recommendation

- 6.109 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/298, SOM/S/H2/298, SOM/S/UR5/298 & SOM/S/GB1/298: The Rowans, Baildon

Objector

3842/8959-61 &
8964

Taywood Homes Ltd

Summary of Objections

- With development on 3 sides, the land relates well to the built-up area. Housing here would form an urban extension.
- The previous UDP Inspector envisaged development on the site in the future.
- A housing allocation would not result in any harm to the Green Belt.

Inspector's Reasoning and Conclusions

- 6.110 This site is within the adopted Green Belt and meets several of the purposes of including land in the Green Belt.

- 6.111 The site itself is an open field, and to the west are further open fields. The site is part of the countryside. Housing on the objection land would encroach on the countryside. There is a long-established caravan site to the north, but this is also part of the Green Belt. There is existing housing only to the south and east. The site at present therefore serves to check the unrestricted sprawl of a large built-up area. The open land of the objection site is part of the countryside separating the housing estates on the western side of Baildon from the developed area of Gilstead. These functions can be appreciated both from the footpath on the site, and from distant viewpoints like the car park alongside High Bank Lane on the southern slopes of the Aire Valley. The Green Belt boundary is defensible here because it follows the edge of development and the stone wall alongside The Rowans.
- 6.112 There is reason for reviewing the boundary of the Green Belt in the district as a whole (see the Policy Framework volume of this report) but the objection land does not accord well with regional and national policy for choosing housing allocations. It is located on the western edge of the main urban area. As an urban extension in such a location it would be at the third level of choice for allocation in RPG12 Policy H2. There are few services and facilities available on this far edge of Baildon. There is a bus service, but only on an hourly basis for most of the day. Development on the site would encourage car use to get to employment and facilities. This was not a prime consideration at the time of the last UDP Inquiry.
- 6.113 My view is that the land is unsuitable for any housing or safeguarded land allocation. It should remain as part of the Green Belt.

Recommendation

- 6.114 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/300 & SOM/S/H1/300.01, SOM/S/GB1/300 & SOM/S/GB1/300.01, SOM/S/GB1/300.02 & SOM/S/H1/300.02: Land at Bents Lane and Harden Lane, Wilsden

Objector

*4599/9782-4, Mr A E Drake
9785/6 & 11164*

Summary of Objections

- The land at Bents Lane should be deleted from the Green Belt and allocated as safeguarded land.
- The land at Harden Lane should be deleted from the Green Belt and allocated for housing, to be developed in the early part of the plan period, or as safeguarded land.

Inspector's Reasoning and Conclusions

- 6.115 The Bents Lane land stands in open countryside, comprising some 20.44 hectares of fields to the north of Wilsden, separated from the settlement by open land, including the Harden Lane site. I consider that safeguarding or developing this land would result in a very major expansion of Wilsden, for which no justification has been advanced other than an unproven demand for housing in the locality. Even if insufficient land has been

allocated in the RDDP for development, the objector accepts that this site would not conform to the sequential principles of identifying development sites. Indeed, in terms of Policy H2 of RPG12 it represents the last in the sequence. It is poorly related to the existing services and facilities in Wilsden, and is not near a major transport corridor. Wilsden itself is not part of the urban area, where development should be concentrated in accordance with national, regional and local policy as set out in PPG3, RPG12 and the RDDP. I do not consider that it represents a sustainable location as identified by the criteria in PPG3.

- 6.116 The land comprises a large area of exposed open countryside physically divorced from Wilsden and Harden. Development would be contrary to the basic purposes and functions of the Green Belt in that it would represent urban sprawl, would lead to the coalescence of Wilsden and Harden and involve major encroachment into the countryside.
- 6.117 I consider that the land has been correctly designated as Green Belt, there is no requirement for development land in this location contrary to national, regional and local policy, and that there is no justification for amending the RDDP.
- 6.118 In relation to the Harden Lane site, this comprises some 4.07 hectares of open fields adjoining the edge of the settlement of Wilsden. The essential differences from the Bents Lane land is that the site is smaller, adjoins the existing built-up area and is less remote from the existing services and facilities in Wilsden.
- 6.119 I consider that development of the site would be contrary to national, regional and local policy in terms of concentrating development in the urban areas. There is no proven local need for land to accommodate additional housing, and in any event the site would represent a significant expansion of Wilsden. Whilst closer to the existing local services and facilities the site is some distance from them and it is likely that occupiers of properties on this land would travel to other, larger centres for their requirements.
- 6.120 I consider that there is no justification for removing the site from the Green Belt. Development would result in urban sprawl, encroachment into the countryside, and reduced separation of Wilsden and Harden as distinct settlements.

Recommendation

- 6.121 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/301 & 301.01: Bingley Road, Menston (SOM/GB1/301 & 301.01)

Objectors

4593/9773-4 *Mr J K Smith*
4594/9778-9 *Mr Young*

Summary of Objections

- More housing allocations are needed and the objection site would provide a sustainable site. It does not function as Green Belt.

Inspector's Reasoning and Conclusions

6.122 From evidence given verbally at the Inquiry, the Green Belt objection is intended to cover the whole site between Bingley Road and the edge of the built-up area. The housing objection site is intended to be slightly smaller, excluding some existing houses on Bingley Road. In the recommendation below, I call these sites respectively the Green Belt objection site and the housing objection site.

Green Belt

6.123 Menston is a settlement in a good quality public transport corridor. I have already concluded that land for housing will have to be allocated in settlements like Menston in order to meet the housing requirement over the totality of the plan period. The objection land is within the Green Belt but, again, I have concluded that there are exceptional circumstances favouring changes to the extent of the Green Belt in the district.

6.124 From the edge of the housing of the settlement the site is at first relatively low lying, before rising to Bingley Road and, more steeply, to Derry Hill to the south-west. A housing development could be contained within the lower parts of the land, with open space provision on the higher south-western section. Hence the encroachment on the countryside, and urban sprawl, could be controlled.

6.125 The site does perform a role in the separation of Menston from Guiseley. The narrowest point of separation is further to the east, but the land is part of the general belt of open land between the 2 settlements. Furthermore, the major developed site of High Royds lies south-east of the site, so the Green Belt is a little vulnerable here as a result of development within it. However, as stated above, the spread of development on the site could be limited by landform.

6.126 As far as Green Belt boundaries are concerned, the existing one at the rear of the fairly straight line of dwelling curtilages is satisfactory. However, a boundary along Bingley Road for the eastern part of the site, as far west as New House Farm, would be a strong one, helping limit the growth of Menston towards High Royds/Guiseley. The road is itself a noticeable physical feature, it carries a significant amount of traffic, and is reinforced by landform, and by the farm and other dwellings alongside it. It would be further emphasised, as the edge of development, in the event that the objection land was allocated for housing.

6.127 The urban regeneration purpose of the Green Belt would be served if the development of this land is delayed until after the re-use of previously-developed land. The phasing provisions of the plan are intended to do this.

6.128 Should the Green Belt here be drawn back, the whole of the objection site should not be excluded from it. The steep knoll, which basically constitutes the south-western field, would form the backdrop to development on the lower land, and is similar in height to the main part of Derry Hill outside the objection site. This higher and steeper land should remain in the Green Belt, with the role of limiting the spread of Menston onto higher land surrounding the settlement. In fact, the higher part of the site has been offered as open space on behalf of the objectors.

Sustainability

- 6.129 Menston is not an urban area either in the settlement hierarchy used in the draft UDP or in the terms of RPG12. However, despite its lowly position in the settlement hierarchy implicit in the regional guidance, sites in Menston are needed to help to make up the total housing requirement. My comments regarding the sustainability of this land are similar to those for the objection site at Derry Hill (SOM/S/H1/121). Development here would be sustainable, but not so as to justify a phase 1 allocation.
- 6.130 There is good accessibility to the station, to the day-to-day services Menston offers, and to an extent by public transport to jobs and services elsewhere. The secondary school is on the edge of Guiseley but is within walking distance of the site. However, for higher-level shopping and services one would look to Guiseley and further afield.
- 6.131 Housing need is dealt with in the Policy Framework volume of this report. At the time the previous Inspector considered an objection involving part of this land there was no need for additional housing land to be allocated. The objection site was then a relatively narrow finger of land projecting south from the settlement.
- 6.132 My overall conclusion is that the objection land is suitable for allocation as a housing site, but for phase 2 release, not for phase 1. The estimated dwelling capacity, for the purposes of calculating overall dwelling totals, is up to 300.

Recommendation

6.133 **I recommend that the RDDP be modified as follows:**

- [a] The Green Belt designation be deleted from the Green Belt objection site, except for the south-western field, which should remain in the Green Belt.**
- [b] The housing objection site be allocated as a phase 2 housing site, with the exception of the south-western field.**

SOM/S/H1/303.01: Land adjacent to Parkside School, Cullingworth (Site A)

Objector

4233/8952 *Mrs Margaret Perris*

Summary of Objection

- The Green Belt designation should be deleted and the land allocated for housing.

Inspector's Reasoning and Conclusions

- 6.134 The site forms part of an area of open grassland immediately to the north-east of the built-up area of Cullingworth. It is contended that the site is no longer viable for agricultural use and housing development would constitute an effective rounding-off of the settlement.
- 6.135 Whilst the site itself may not form a viable agricultural unit, I have no evidence that it could not be leased to another agricultural holding. It appears to be well-tended good quality pasture.

6.136 The site is beyond the existing built development and would represent encroachment into the open countryside. It is also located on rising ground so that built development would be conspicuous. Vehicular access is poor, along generally unmade narrow streets. The additional traffic generated by housing development would increase the current unsatisfactory situation that includes conflict of vehicular traffic with children going to and from the adjacent school.

6.137 I can see no justification for the removal of the land from the Green Belt.

Recommendation

6.138 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/317 & SOM/S/GB1/317: Bleach Mill Lane, Menston

Objector

4154/9600/1 *Mr D B Holdsworth*

Summary of Objections

- The land partly meets the definition of previously-developed land. A sensitively designed housing scheme would be compatible with the surrounding Green Belt.

Inspector's Reasoning and Conclusions

6.139 Even if the site once contained housing, it now has the characteristics of a greenfield site, being largely grassed and having an attractive pond in a position well seen from the adjoining public right of way. It is not an extension to any town, but instead is located in the open countryside outside any settlement. Consequently it has a very low priority in the sequential approach to the allocation of housing land. Considering it as a site in a rural area, there is no evidence of a local need for the allocation of such an unsustainable site. The land is reached by way of a track and does not have good access to public transport.

6.140 The site is within the adopted Green Belt and fulfils some of the purposes of including land in Green Belts. It is located in the heart of the countryside between Menston and Burley, and helps to separate the 2 settlements. It assists in safeguarding the countryside from encroachment. Even well designed housing would reduce the openness of the land and conflict with the purposes of the Green Belt. The exceptional circumstances for reviewing the Green Belt do not justify releasing from the Green Belt this isolated site where development would be unsustainable.

Recommendation

6.141 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/318 & SOM/S/GB1/318: Grange Farm, off Burley Lane, Menston

Objector

4154/9594 & *Mr D B Holdsworth*
9599

Summary of Objections

- There is a shortage of housing land and this is a sustainable site for housing.
- Development would form a logical extension to Menston.

Inspector's Reasoning and Conclusions

6.142 The site is part of the Green Belt and functions as Green Belt by safeguarding the countryside from encroachment. The site is a large (approximately 13.2 hectares) piece of open land west of Menston. The housing to the north-east takes the form of ribbon development projecting from the main part of Menston towards Burley. Given the size of the open site, and the relatively narrow stretch of development to one side, I consider that building on the objection land would not constitute rounding-off. Also, in view of the scale of the urban development in this part of West Yorkshire, and the size of the objection site, development on the land would lead to the sprawl of a large built-up area.

6.143 Much of the housing requirement can be met from a combination of previously-developed land, and greenfield sites located within higher order settlements than Menston. The question of releasing more housing land in Wharfedale is considered in the Policy Framework of this report. Within Menston itself, there are more suitable sites than this objection land. Finally, there is no indication that a satisfactory access could be provided to the site.

Recommendation

6.144 **I recommend that no modification be made to the RDDP.**

SOM/S/H1/375 & SOM/S/GB1/375.01: Trench Wood Barn, Higher Coach Road, Baildon

Objector

2150/11412-3 *Mr John Wilkinson*

Summary of Objections

- The land should be deleted from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

6.145 Together with a small group of other buildings on the north side of Higher Coach Road, the site is included within the Green Belt. Over a period of some years the objector has sought planning permission on 3 occasions for a dwelling on various parts of the land. These have been refused, and appeals against 2 of these decisions dismissed, for reasons

including harm to the Green Belt. The objector wishes to undertake a small-scale housing development, comprising 2 or 3 dwellings.

6.146 I consider that Higher Coach Road provides a strong and distinct boundary between the Green Belt and the residential development to the south. The mature trees in the area would provide some screening of housing on the objection site. However, development would nevertheless represent urban sprawl, encroachment into the countryside, and harm to the openness of the Green Belt. Thus, development of the site would harm important purposes and functions of the Green Belt.

6.147 No special circumstances have been advanced to justify alteration to the Green Belt boundary. In addition, development of the site would impact upon the setting of 2 listed buildings and could affect trees covered by a designated Tree Preservation Order. I note that specific representations of support for the Green Belt boundary in this area have been made.

6.148 These conclusions should be read in the context of my conclusions regarding the Baildon Bank Green Belt objections (see 13.3 *et seq* below). I have dealt with the Trench Wood Barn objection on the basis that the surrounding land is within the Green Belt in the RDDP.

Recommendation

6.149 **I recommend that no modification be made to the RDDP.**

S/H2.1, SOM/S/GB1/176 & SOM/S/NE9/176: Tong Park, Baildon

Objectors

2803/7026, *Bradford Urban Wildlife Group*
6851 & 6854
4220/9716 *Bodycote Developments Ltd*

Summary of Objections

- The site should be part of the Green Belt. It is greenfield land of geological, nature conservation and archaeological interest. It should be a third tier nature conservation site.
- Phasing should be altered to phase 1. This is a sustainable site, near many facilities and services. Access difficulties, previously assumed to be a constraint, can be overcome. There are no other constraints.

Inspector's Reasoning and Conclusions

The Principle of Allocation

6.150 This is an urban greenfield site. It is included within the urban area depicted by the approved UDP and on the RDDP Proposals Map. It does not form part of the Green Belt in the approved UDP. To the south-west is the main part of Baildon, and to the west a wooded bank and then new housing. There is large-scale old industrial development, and some scattered housing, to the north, and the urban area extends to include these. I conclude that the site is properly included in the urban area, and should not form part of

the Green Belt. The main Otley Road to the east of the land constitutes a perfectly sound Green Belt boundary.

- 6.151 There is some debate as to whether the hillock, which makes up most of the site, is a glacial moraine. The Council, via its evidence and the 1993 letter from the Senior Assistant Keeper, Natural Sciences and Education, seems to agree that it is. However, there are other better examples in the area, and the weight of evidence is that there is no need to preserve this one. The ridge and furrow on the site may be as recent as the early nineteenth century.
- 6.152 In my judgement the species list provided by the Bradford Urban Wildlife Group is not so remarkable that the site should be preserved from building. The site is largely improved pasture, and the Council has not identified it in the Nature Conservation Strategy. There is no evidence that the land constitutes a habitat of particular value, and insufficient evidence to support the identification of it as a Bradford Wildlife Area which should be specially protected under the terms of Policy NE9.
- 6.153 The interesting features of the site could be investigated and recorded as part of a development. In particular, the geological characteristics could be made available to students by way of records, and other moraines in the Aire Valley would remain for study *in situ*.
- 6.154 Because there is insufficient urban previously-developed land to meet the housing requirement, the site should be allocated for housing.

Phasing

- 6.155 Objections regarding this site were considered at the Inquiry into objections to the approved UDP. The Inspector records in his report that neither objectors nor the Council put forward solutions to the access difficulties. At my Inquiry, solutions were advanced, and after the Inquiry session which was concerned with the site, further plans were provided and discussions took place between the owners and the Council. The Council is satisfied that an access which meets its requirements could, in principle, be provided. This accords with the burden of the Council's letter of June 2001. In view of all the evidence, and having seen on site the possibilities for access, I am of the opinion that access difficulties need not hold up the development of the site.
- 6.156 The site has a mixed record as far as sustainability is concerned. However, it is not as well placed as other urban greenfield land near the centre of Queensbury and in Ilkley (sites SOM/BS/H1/149 and K/H1.9). Although the site is within walking distance of a station, a bus service and some other facilities, Tong Park is not close to shops or the centre of Baildon, to a 10-minute frequency bus service, or to a secondary school.
- 6.157 Furthermore, the land is quite attractive because of the combination of landform, openness and trees. The provision of a modified access would result in the loss of both some protected and unprotected trees.
- 6.158 Although it scores reasonably well in terms of sustainability, its locational advantages do not override its position as a second choice site in the sequential approach set out in Policy H2 of RPG12. Other considerations add weight to a choice of phasing post-2009.

Recommendation

6.159 **I recommend that no modification be made to the RDDP.**

S/H2.2: Southdown Road, Baildon

Objectors

932/8977 *Baildon Community Council*
3151/9261 *Dr Mike Woods*

Summary of Objections

- The local infrastructure is unable to cope with all of the extra development proposed in this area. In particular, the road system is inadequate.

Inspector's Reasoning and Conclusions

- 6.160 I have dealt above with the question of infrastructure in this part of Baildon (S/H1.6-1.8). The Southdown Road site is relatively small, at about 1 hectare in area, and in general terms development on it would make few demands on local services and roads. There is one exception to this general conclusion, and that exception relates to the junction of Green Lane with Otley Road. Again, the problems of this junction are referred to elsewhere, but in the case of the Southdown Road land proximity to the junction means that the traffic from additional housing would exacerbate an already difficult situation.
- 6.161 The RDDP contains a junction improvement proposal, S/TM20.5, intended to solve the problems at the junction of Green Lane with Otley Road. As this is unlikely to be implemented for 5-10 years the objection site should not be allocated for housing until the second phase of the plan.
- 6.162 With regard to access to the site itself, there are frontages to 2 roads. I see no traffic reason why access should not be taken to Southdown Road. Nor is the site in a hilly part of Baildon, and public transport is good. There are no objections from service providers who have been consulted about such matters as drainage.
- 6.163 A further reason for introducing a phasing delay is the character of the land. Technically the site may be recycled land, but it has the character and appearance of a greenfield site. There is no sign of the cleared housing which once occupied the land. Instead the land is an attractive amenity area with trees and mown grass, even though apparently not used as public open space. My view is that this character should not prevent the eventual development of the site, as there is considerable open land in the neighbourhood, and the site could contribute a sustainable housing scheme within the main urban area. Nevertheless, the character of the land should act against phase 1 release.
- 6.164 Finally, the small overgrown area east of the site, although probably in different ownership, could be included as part of the allocation. There is no indication of difficulties in developing this land. However, I make no recommendation on this as the matter falls outside the scope of the objections.

Recommendation

6.165 I recommend that no modification be made to the RDDP.

S/H2.3, SOM/S/GB1/184 & SOM/S/NE9/184: Former Reservoir, Leyfield, West Lane, Baildon

Objectors

18/1262	<i>Christopher Leslie MP</i>
2463/2001	<i>Councillor John Cole</i>
4174/3181	<i>Keyland Developments Ltd</i>
4295/4854 & 6882	<i>Ms Annie Barker</i>
4362/8942	<i>Keyland Developments</i>
4527/10492 & 10565	<i>Mr John Dallas</i>

Summary of Objections

- As part of Baildon Hill, the land is of archaeological, historical, ecological and educational interest. It is within the Saltaire World Heritage Site buffer zone, and should be Green Belt.
- The recent appeal decision regarding this site was based too heavily on the adopted UDP and on outdated information.
- Housing here would be unsustainable, and only part of the site is previously-developed land.
- Baildon has been overdeveloped, and is plagued by traffic congestion.
- The allocation should be deleted. If it is not, a phase 1 allocation would be inappropriate.
- The site should be re-phased to phase 1 as it is already allocated in the adopted UDP, is previously-developed land, has better sustainability than other sites, and is immediately available.

Inspector's Reasoning and Conclusions

6.166 The Council's Inquiry evidence now suggests a phase 1 allocation, following an appeal decision. The appeal was dismissed, but on the grounds that no affordable housing was to be provided. On other issues, the Inspector found against the Council and objectors to the appeal proposal.

The Principle of Allocation

6.167 None of the remains found on Baildon Moor have been found on the objection site. The West Yorkshire Archaeological Service has considered the site and requests no more than that the remaining reservoir be recorded. As for the literary importance of the area, and its use by Saltaire millworkers, the allocation is only a small part of the moor and hillside. The site must be seen in the context of the substantial housing estates to the south-west, south and east. Similar considerations apply to local fauna and flora. There is no specific evidence of the site playing an important ecological role, but a large open area would remain after the development of the site.

- 6.168 It will be for the Council to decide whether Baildon Hill should be designated as a conservation area.
- 6.169 The land is visible in some views from the World Heritage Site at Saltaire, but so is the substantial built-up area to the east. The reservoir development would appear as a minor addition to the housing extending westwards from Baildon. Bearing in mind also the mitigation possible by way of layout, landscaping and design, development would not materially harm views out of the World Heritage Site. The hillside containing the site is prominent over a wide area but the points I have already made, about seeing the site's development in the context of the existing neighbouring built up area, apply.
- 6.170 The objection land is partly greenfield land and partly previously-developed land. The Council did not seriously dispute the evidence of objectors that the proportion of previously-developed land is about 55%. However, I do not accept the arguments of objectors that the previously-developed part should not in fact be regarded as previously-developed land because it consists of former reservoirs. The open reservoir is not in fact a large area of open water; it is a massive structure set into the hillside, and can be well seen from higher up the slope. The former covered reservoir has been partly cleared away but foundations remain.
- 6.171 I discuss the sustainability of housing development on the site below. Sustainability is not so bad as to outweigh the need to meet the overall housing requirement and to use urban recycled land.
- 6.172 Objectors seeking the removal of the allocation raise a number of other points. The reservoirs are no longer needed for storing drinking water. No detailed evidence is given of significant harm arising from alleged over-development in Baildon. I have seen for myself the traffic congestion in the centre of Baildon and along the corridor leading to Shipley. Nevertheless, Baildon is part of the main urban area within which substantial new building is to be expected, with its attendant traffic. Generally, the affected roads to which my attention has been drawn are not part of the major road network, where congestion would have significant effects in terms of regional and national communications. I do not consider that the adverse effects of traffic congestion in Baildon outweigh the need to allocate urban previously-developed land.
- 6.173 I conclude that the objection land should continue to be allocated as a housing site. There is no evidence that the site has ever been part of the Green Belt. As it is partly previously-developed land, with housing estates to the east and south, I consider that it is part of the urban area and not of the countryside. There are no exceptional circumstances to warrant extending the Green Belt to include the site. However, the existence of the Green Belt to the west would prevent the allocation of the site from creating a precedent for the spread of development further west along the hillside.

Phasing

- 6.174 The circumstances of my Inquiry are different from those obtaining at the time of the previous appeal Inquiry. The phase 1 housing requirement is largely met by estimated windfalls, sites with planning permission, and sites which are not the subject of objection and are therefore not for me to question. When sites which are wholly urban previously-developed land have been taken into account there is only a limited need to allocate urban greenfield land, particularly bearing in mind that over-allocation would lead to the harmful development of more greenfield land. The reasoning and statistics leading up to

this conclusion are explained in the Policy Framework volume of my report. In my view, the fact that the reservoir site is partly previously-developed land gives it an advantage over purely greenfield sites. However it is necessary, in accordance with RPG Policy H2, to test the comparative sustainability of the site against the urban greenfield sites which are before me for consideration for allocation.

6.175 The only community facility which is within an easy walk of the land is a primary school. The local centre of Baildon is about 1.2km distant, and the site is not well placed for access to Shipley town centre. The secondary school is about 1.4km away but the walk is described by the Council as being up a steep hill and along a secluded footpath. There is a bus service to the secondary school, but otherwise the bus service along West Lane is only hourly for most of the day. Substantial evidence, to show that the building of houses on the objection land would lead to a marked and permanent improvement in the bus service, has not been provided to me. There is no significant local employment, shopping or other similar services. In comparison with the best performing urban greenfield sites for which I have detailed evidence (e.g. SOM/BS/H1/149 and K/H1.9), the objection land is markedly less sustainable. The comparatively poor sustainability in my opinion overrides the consideration that part of the objection land is urban previously-developed land. In consequence, I conclude that the most sustainable urban greenfield sites should be allocated for phase 1 housing, and that this objection site should be allocated for phase 2 housing.

Recommendation

6.176 **I recommend that no modification be made to the RDDP.**

S/H2.6: Crow Nest, Bingley (SOM/S/CF3/46, SOM/S/OS1/46, SOM/S/OS2/46, SOM/S/GB1/46 & SOM/S/NE9/46)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The housing allocation on the land should be deleted and the site retained in open space use.

Inspector's Reasoning and Conclusions

6.177 The RDDP removes the housing allocation and leaves the site unallocated.

6.178 I understand that the site is used for informal recreation and is mainly owned and maintained by the Council. Given the size, location and use of the site I consider that it should be designated in the RDDP as recreation open space under Policy OS2.

Recommendation

6.179 **I recommend that the RDDP be modified by the allocation of the site as recreation open space under Policy OS2.**

S/H2.7 & SOM/S/OS6/306: Cottingley Moor Road, Cottingley

Objectors

2804/8932 & *Bradford Urban Wildlife Group*
9012
4692/8944 *Mrs Phyllis Pettit*

Summary of Objections

- The allocation for housing should be deleted and the land used as open space, including allotments.

Inspector's Reasoning and Conclusions

- 6.180 The site forms a fairly small wooded area immediately south of Cottingley Beck, separating the original village core from more recent housing mainly accessed from Cottingley Moor Road.
- 6.181 Attention has been drawn to the historic significance of the location in relation to the hoax fairy photographs taken in the locality, which generated national and international interest. In addition, it is argued that the mature trees should be preserved and that the site is of important nature conservation interest.
- 6.182 I consider that the site is important to the character and appearance of the area, with the trees forming a backdrop to the buildings in the original village core (including the Town Hall) and the more recent development along Cottingley Moor Road. Housing development on this site would inevitably require the removal of many of these trees thus destroying this setting. Furthermore, although the site has no official nature conservation status, it has clearly been little disturbed over many years, and I have no doubt now forms a significant wildlife corridor, especially with the development in recent years of adjoining land for housing.
- 6.183 Whilst the Council states that the site is required for housing to meet the needs of the area in the later years of the plan period, it is a small site and Cottingley has been the location of very significant levels of housing development in more recent times. The proximity of this site to the original village core, and its physical and visual significance to its setting, are strong arguments against development.
- 6.184 In addition, adequate vehicular access to the site would be difficult, especially as the Council states that previous ideas of access to the site from the adjacent housing area have been ruled out by more recent planning permissions. I do not consider that vehicular access from the Main Street/Bradford Road junction would be appropriate or safe. Access from the village core via the Strand would involve bridging the beck, which would result in even greater harm to the physical and visual setting of the core, and use of a sub-standard junction with Main Street.
- 6.185 Taking all these factors into account, I conclude that the allocation of this site for housing is inappropriate.
- 6.186 Concerning the historic interest referred to, I understand that the site is in the locality of the "fairy sighting" episode, and recent housing developments have affected the area

more central to this event. Whilst such an episode cannot in itself be sufficient to warrant the protection of the site from development, it would be a pity if further land associated with the event were lost to unnecessary development.

6.187 In terms of future use, the topography of the site and the important tree cover preclude use as allotments. I consider that, on the basis of the characteristics discussed above, village greenspace (Policy OS7) would be appropriate.

Recommendation

6.188 **I recommend that the RDDP be modified by the deletion of the housing allocation on site S/H2.7 and its replacement as village greenspace under Policy OS7.**

S/H2.9: St Philip's Drive, Burley in Wharfedale, Ilkley

Objectors

These are listed in the appendix to this report.

Summary of Objections

- Burley is over-developed. Services and infrastructure are under strain, and the site floods.
- The site is used for informal recreation and should be designated as public open space.
- Development would cause visual harm to the Green Belt.
- Constraints on site would make development difficult.
- More housing would result in additional car journeys.
- The land forms part of the open setting of Burley House, a Grade 1 listed building.

Inspector's Reasoning and Conclusions

6.189 I have considered this site in relation to S/OS7.1 below, where I conclude that a recreation open space designation would be appropriate.

Recommendation

6.190 **See my recommendation under reference S/OS7.1 below.**

S/H2.10: Sty Lane, Micklethwaite (SOM/S/OS1/1 & SOM/S/GB1/1)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The UDP Inspector did not approve the site for housing.
- The allocation conflicts with national policy. The site is neither sustainable nor previously-developed land.

- Development would harm the landscape, listed buildings, archaeological remains, the Leeds-Liverpool Canal Conservation Area, and valuable ecological features.
- Development would lead to the coalescence of built-up areas and settlements along the side of the Aire Valley.
- Agricultural production would be harmed.
- The services and infrastructure locally, and in Bingley, would be further over-stretched.
- The roads in the vicinity are totally inadequate and dangerous.
- The road bridge carrying Micklethwaite Lane over the canal would not be able to carry the additional traffic which would result from a housing scheme.
- Bingley town centre would experience too much traffic.
- The housing allocation should be deleted and replaced by designation as Green Belt, urban greenspace or safeguarded land. Alternatively the site should be unallocated.
- A new bridge over the canal could easily be provided. The allocation should be advanced to phase 1.

Inspector's Reasoning and Conclusions

Introduction

6.191 The Inspector who considered objections to the adopted UDP was working in a policy climate and in local circumstances which were different from those of today. Although I note that the adopted UDP allocates the site as a constrained housing site, I regard the RDDP as a replacement plan which is not tied by the existing plan or the previous Inspector's conclusions. Nevertheless, where that Inspector arrived at conclusions concerning environmental matters which have not been the subject of changed circumstances, I am in general agreement with those conclusions, for reasons I explain in detail below.

Sustainability

6.192 My conclusions regarding the settlement hierarchy and the application of regional policy to the district as a whole are given in the Policy Framework volume of this report. Bingley is a market town in the context of regional policy, and therefore an urban area. My view is that the built-up area of the town extends as far as the eastern edge of the objection land. The development of the site would therefore be an extension to the market town of Bingley, which in physical terms would accord with Policy H2 a) iv) of RPG12. This is not very high in the hierarchy of types of site set up by the policy, but the scale of the housing requirement remaining after the allocation of more preferable land means that such a site should be allocated, subject to more detailed tests.

6.193 In assessing accessibility to services, I use the guidelines of the Institute of Highways and Transportation (IHT), as used by the professional witnesses at the Inquiry, including the Council's witnesses. I do not prefer the distances set out in regional guidance for the South West Region, which is not the guidance appropriate to Bradford District.

6.194 The site is situated on the eastern side of the Aire Valley. In the floor of the valley run the Leeds/Bradford-Skipton railway line, and the A650, which carries a frequent bus service. There are bus stops at Crossflatts on the A650 to the west, a station, and a local centre. Although the site is separated from these facilities by the Leeds-Liverpool Canal, a replacement for the Micklethwaite Lane bridge could be provided as part of a housing proposal, together with a new footbridge connecting the south-eastern part of the site

with Canal Road on the opposite side of the canal. The land would be beyond the IHT desirable walking distance for some common facilities. However, the majority of the site would be within the IHT acceptable walking distance of these services.

- 6.195 Higher level services and employment are available a short bus ride away in Bingley town centre. To walk or cycle to the town centre alongside the canal is an attractive prospect in some conditions, in my opinion, although the walk is quite lengthy. I also note that there are employment opportunities in Crossflatts. The nearest primary school is more than the acceptable walking distance away, but it is within the preferred maximum distance. Bingley Grammar School is an acceptable walking distance away from the centre of the site.
- 6.196 Overall, my opinion is that the land is not so inaccessible as to be unworthy of allocation for housing. There is no overriding sustainability reason to depart from the regional guidance's sequential approach. Unallocated sites investigated in good quality public transport corridors do not out-perform Sty Lane by so much that they should be allocated in preference to it.
- 6.197 In coming to these conclusions I have given some weight to the developer's intention to provide funding, if funding is necessary, for a bus service into the site, for at least 15 years. The size of the site (700-900 dwellings) is in its favour in this respect, and the professional evidence is that such a service would be profitable. I do not have the detailed technical evidence to convince me that a service would be impracticable because of gradients or other considerations. In this connection, and in relation to ease of walking and cycling, many sites in the district are steep. At Crossflatts, the valley sides are steep in places, but the valley bottom is not. The high car dependency of the existing housing near the site may be a function of high car ownership. In any case there are opportunities for future residents of a development on the site to use other modes of transport.
- 6.198 There was a small proposal, overlapping part of the site, for which the Council refused planning permission, partly on sustainability grounds. However this would have located houses beyond the north-eastern edge of the site, further from facilities.
- 6.199 The site is not "highly accessible", the term used in PPG13 in connection with planning for increased intensity of development. Regional guidance will have taken this national advice into account in drawing up Policy H2. The location is nevertheless accessible or capable of being made accessible to services and jobs by good public transport and other non-car modes.
- 6.200 Policy H2 in regional guidance refers to national policy in PPG3. I deal above and below with various matters referred to in the PPG. Additionally, I conclude here that development would not fail to assist in building communities. The substantial number of new dwellings could be expected to support existing facilities and services in Crossflatts and Bingley, together with, as already stated, a bus service to the site. In principle I do not see that such a large site would be unable to provide for a variety of housing types and households, including affordable housing.
- 6.201 National policy of course favours the allocation of greenfield land after previously-developed land, and this would be complied with if Sty Lane were to be allocated in the second phase of the plan period. This phasing would also enable the development of previously-developed land and other urban sites, before that of Sty Lane, to achieve regeneration benefits. As for the RDDP's allocations which are extensions to settlements

other than Bingley, they are considered in the appropriate places in this report. I recommend the deletion of several allocations, for reasons given in the report. These allocations are not therefore available to help in meeting the housing requirement. Similar factors apply to some unallocated sites which objectors wish to see allocated in the plan; these are not available to replace the Sty Lane site.

Highways and Traffic

- 6.202 All parties are agreed that there are severe inadequacies in the road pattern east of the land, but there is no need for the land to have vehicular access from this direction. Roads north of the site, such as that through Micklethwaite, are also poor. Although most traffic would be attracted onto the main roads in the Aire Valley, such as the new Bingley Relief Road, some would use the country lanes and moorland roads to the north. However, the completion of the relief road is projected to reduce traffic on the moorland roads by about 30%. I conclude that the traffic use of these roads, occasioned by the development of the Sty Lane allocation, would not result in increased danger over that experienced at present.
- 6.203 Evidence presented at the Inquiry shows one way of laying out a housing development on the site. Some of the objections are based on assumptions about the detailed highway layout, which has not yet been designed.
- 6.204 The professional engineer witness representing many of the objectors agreed at the Inquiry that several of the highway problems associated with development could be overcome. The main access would be via a replaced Micklethwaite Lane bridge over the canal. The developer would provide whatever type of bridge is required, either a swing bridge or a fixed bridge. I do not go further than saying that a satisfactory replacement is possible in principle. The question of the type of bridge is one for others to settle. Land ownership is not likely to prevent the relocation of the bridge, and the detailed evidence does not support the contention that providing the new bridge would delay development beyond the plan period.
- 6.205 It would not be necessary to use the existing lengths of Micklethwaite Lane and Sty Lane adjoining the site as part of the direct accesses into the main part of the land. New lengths of highway within the site and parallel to the existing roads could be provided to enable modern standards to be met. This arrangement would bypass the inadequate junction of Micklethwaite Lane and Sty Lane.
- 6.206 The volume of traffic on the A650 through Bingley town centre is likely to be very substantially reduced on the opening of the relief road. I agree with the Council that the full effects of the new road need to be monitored before a judgement can be reached on future conditions in the town centre with and without a development of the Sty Lane site. A Transport Assessment of the housing development can be undertaken as part of the preparation of a planning application. The relief road would attract a substantial proportion of the additional traffic which might otherwise use the route through the town centre. Even so, part of the traffic reduction resulting from the relief road would be lost as a result of the development, but it is not possible to say how much. Also, not all of the traffic on the A650 generated by the development would pass through the town centre. Some would have business locally, and traffic in urban areas is to be expected as a result of development closely related to urban areas. In my opinion the effect of the development's traffic on the town centre does not provide a significant reason for deleting the allocation of Sty Lane.

Infrastructure Capacity

- 6.207 The nearest primary school to the site has places available, as do others locally. Secondary schools in Bingley are popular and do not have spare places. Pupil number projections do not cover phase 2 of the plan period, but there is no reason to believe that the popularity of the schools will decline over the next few years. However, a phase 2 allocation would mean that new pupils would not arrive at the local schools until several years hence, giving time to plan for possible pupil number increases. The popularity of the schools attracts pupils from further afield than the objection site, and it might be possible to amend the catchment area of Bingley Grammar School to ensure that areas near the school, such as Sty Lane, have priority for places over areas further away. If not, then the developer would fund the level of school expansion necessitated by the new housing development.
- 6.208 Medical and other facilities in the Bingley district are under pressure from the numbers of people using the services. As with education services, the effects of the Sty Lane development would not be felt for some years. This allows time for service providers to plan to meet increased needs.
- 6.209 There is no expert evidence to suggest that the land cannot be satisfactorily drained.

Environmental Considerations

- 6.210 The objection land is a pleasant piece of countryside, like some other greenfield sites, but does not have any special landscape value. I have already concluded that allocation of greenfield land is necessary to meet the housing requirement. Development would extend the urban area of Bingley across an area of countryside, and this would be appreciated both from nearby and from more distant viewpoints like Altar Lane. However, the site has in effect been partly enclosed by the growth of development nearby. There is housing, and other urban land uses, to the south and west, and along much of the eastern side of the site. Housing on the land would be partially contained by existing development. I do not consider that development of the land would lead to the coalescence of separate settlements. Crossflatts is already physically linked to Bingley by development along the Aire Valley communication routes.
- 6.211 As far as light pollution is concerned, building on any greenfield or other unoccupied land would increase the amount of lighting used. I repeat that the context of the site is urban, except to the north. Design is capable of minimising the quantity of light which is seen in views of and from the land.
- 6.212 Micklethwaite would still be separated from the nearby urban area even after the development of the site. The considerations affecting development in the village of Micklethwaite are very different from those surrounding the possible allocation of the objection land.
- 6.213 The Leeds-Liverpool Canal Conservation Area abuts the site, although the Five Rise Locks are too distant to be affected by the allocation of the site. The conservation area is some 23.63 kms long in Bradford District. It adjoins both urban and rural areas, and the sections near the site to east and west have existing development on both sides. There is industry and housing south of the canal opposite the site. The development of new housing on the site would not be out of character in that context. If necessary, the new building could be set back from the canalside, although there is no reason in principle

why buildings should not be located alongside or within conservation areas. However, the new bridge would be likely, on the evidence I have, to harm the character and appearance of the conservation area. The bridge would be a larger structure than the present one. To my mind it would be difficult to design it in such a way as to avoid it being obtrusive, but the weight I attach to this objection is reduced by the fact that design work has not yet started and might produce an acceptable solution.

- 6.214 The listed building at Laythorpe could be left clear of development as it is situated towards the edge of the site's main part. Any archaeological remains could be recorded: there is no evidence that they would be likely to be of sufficient importance to warrant preservation *in situ*.
- 6.215 There are 2 Sites of Ecological/Geological Importance (SEGI) nearby. Bingley North Bog is separated from the site by existing housing. Development already interrupts any potential wildlife corridor crossing the Aire Valley. Whilst I note that SEGIs are sites of regional importance, the canal SEGI is long and the section adjacent to the objection land is of low interest in itself, with poor plant diversity. It would continue its role of connecting stretches of water of greater interest. Again, if necessary, development could be kept back from the margins of the canal. There is the potential to keep worthwhile trees and hedgerows on the site. In my view, the species found on the site and adjacent length of canal do not indicate that these features are of particular ecological interest. Similarly, the land is not of great value in agricultural terms.

Overall Conclusions on the Housing Allocation

- 6.216 The principal harmful consequence of developing the land would be the expansion of an urban area into the countryside, and the loss of a greenfield site in the process. Some traffic from the site would use the narrow and steep country lanes north of the land, and the traffic flow through Bingley town centre, having been reduced by the relief road, would increase, but not back to the levels experienced before the opening of the relief road. A modern bridge would span the canal and could appear unsympathetic. However, the harm from development would in my view be less than the benefits from an otherwise sustainable allocation which would go a substantial way towards meeting the housing requirement. My opinion is that the need for housing land to be allocated outweighs the objections to allocation.

Other Suggested Allocations

- 6.217 The site is not, and has never been, part of the Green Belt. It is clear from my conclusions regarding housing that I do not consider that there are exceptional circumstances to add the land to the Green Belt. As the land has development practically on 3 sides it is not part of the swathe of land outside the urban area which would prevent, for example, the coalescence of Bingley with any other urban area. Nor is there justification for an urban greenspace allocation. The housing requirement in relation to land availability is, on present evidence, such as to outweigh the value of the land as open space. The requirement during the plan period is sufficiently large for the allocation to be for housing rather than as safeguarded land.
- 6.218 The representatives of some objectors suggested at the Inquiry that the site be left unallocated. I do not agree with this course of action. It is important that local authorities should deliver agreed housing numbers. Bradford is a large urban district with a substantial housing requirement and, given the topography and other constraints, some

difficulties in meeting the requirement. In my view the development plan for the district should be transparent in showing that the requirement can be met on identifiable sites, once allowance has been made for windfall sources of housing.

Phasing

6.219 On the basis of my conclusions above, infrastructure and other constraints are not sufficient to delay the allocation of the site. The Council does not seriously pursue the argument that such matters as the possible need for a school extension should place the site in phase 2. The weight of expert evidence favours a conclusion that the provision of a new bridge over the canal would not demand a delayed phasing. However, a phase 2 allocation is appropriate simply because the site is greenfield land constituting an urban extension. Phase 1 can be completed without recourse to such sites.

6.220 The view was put at the Inquiry that, if a phase 2 allocation were to be deemed necessary, the site should be identified as being of strategic importance. It is true that the contribution of housing from this land would be larger than for any other site allocated in the plan. Furthermore, there are significant matters to be settled before the site can be developed. Nevertheless, I conclude that the site should not be given a strategic status. This is because of the absence of an urban capacity study for the district. It is possible that, when one has been carried out, the need for the site would be reduced. The Council can give consideration to the question of the strategic importance of the land when the development plan is next reviewed.

Dwelling Contribution

6.221 Two different capacities were given in most of the Inquiry evidence on this site, namely 700 and 900 dwellings. However the Council figure of 900 was not the result of detailed work, and it is possible that parts of the site would need to be kept open as buffers. I am using the lower figure for the purpose of calculating the site's contribution to meeting the dwelling requirement. I am also aware that the size of the site might make it difficult, in the time available in the second phase, to build more houses than I allow for, even in a second phase which lasts until 2016. In allowing for a production of 700 dwellings 2009-2016, I assume a construction rate of 100 dwellings per annum.

Recommendation

6.222 **I recommend that no modification be made to the RDDP.**

S/H2.13: Hazel Beck, Cottingley

Objector

2972/12170

The Shipley (Beckfoot) Golf Club

Summary of Objection

- This long-established allocation should reflect the sustainable location of the land, its potential good access, and the need for greenfield land to be developed. The phasing should be returned to phase 1.

Inspector's Reasoning and Conclusions

6.223 This objection is dealt with above, under S/H1.17.

Recommendation

6.224 **See my recommendation in relation to S/H1.17.**

SOM/S/H2/203 & S/UR5.6: Crack Lane, Wilsden

Objector

4284/8394/5

Allied Textiles Companies Plc

Summary of Objections

- Allocation of this safeguarded land for phase 2 housing would improve the choice and distribution of housing land, as there are few allocations in the villages.

Inspector's Reasoning and Conclusions

6.225 Within the RDDP Wilsden is categorised as a less well located smaller settlement. The village contains a number of shops and services but is neither an urban area nor situated in a good quality public transport corridor. There is no railway station, and the half-hourly bus service to Bradford does not in my opinion amount to a frequent bus service to the main urban area. Wilsden is located in an area of villages between Bradford and Keighley, and is relatively isolated in comparison with most of the more urban settlements in the district. In terms of Policy H2 of RPG12 the site does not fall into any of the several categories of urban site which have relatively high priority for allocation on grounds of sustainability. In view of the settlement's location and lack of good quality public transport links to the main urban area I conclude that it is not a sustainable place for substantial housing allocations.

6.226 A previous development proposal failed because of its effects on highway safety, but a subsequent planning application illustrated how this problem could be overcome. The RDDP contains Proposal S/TM20.1, which would provide the necessary highway works. Nevertheless, there is no justification to allocate this relatively unsustainable site for housing to meet the plan's requirements.

6.227 No evidence is offered as to any other possible reason why the land should not be allocated as safeguarded land, other than the alternative allocation for housing. The land might be needed for housing in the longer term and the safeguarding allocation would ensure its availability.

Recommendation

6.228 **I recommend that no modification be made to the RDDP.**

SOM/S/H2/393: Bolton Hall Road, Bolton Woods

Objector

4174/11069

Keyland Developments Ltd

Summary of Objection

- This sustainable site within the urban area of Bradford adjoins a large permitted housing site.

Inspector's Reasoning and Conclusions

6.229 The Council does not resist the identification of this land as a site which would contribute to the housing requirement. Construction has started on the neighbouring land, and preparatory work appears to have been undertaken on the remainder of the permitted site. The area generally is a former quarry within the main urban area, and the objection land is previously-developed land. Although local services are not close by, they are not so distant as to constitute a factor which overrides the search sequence found in RPG Policy H2. However, the land itself appears to require substantial preparation and consolidation, and, as suggested by the late phasing put forward in the objection, this particular piece of land is likely to be developed at the end of the programme of building the whole housing estate at Bolton Hall Road.

6.230 I conclude that the site should be allocated in the plan as a housing site. I do not see why planning permission should be withheld until phase 2, should an application be forthcoming, but in view of the likely development programme its contribution of dwellings would not be made until phase 2. This should be explained in the plan.

Recommendation

6.231 **I recommend that the RDDP be modified as follows:**

- [a] **PROPOSALS MAP – show the objection site on Bolton Hall Road as a phase 1 housing allocation.**
- [b] **SHIPLEY CONSTITUENCY VOLUME – include an entry for this objection site as a phase 1 housing site, but with an explanation of the likely programme of development and the reasons for this.**

Chapter 7 Centres

S/CT1.1: Bingley Town Centre (Arts Centre)

Objector

2803/8826 *Bradford Urban Wildlife Group*

Summary of Objection

- The interest of Jubilee Gardens for bio-diversity should be recognised.

Inspector's Reasoning and Conclusions

- 7.1 The area around the Arts Centre was laid out as a public amenity area in 1978 with mounds and trees, some of the trees now being quite large. As a whole it is no doubt of value for wildlife as well as being appreciated by residents and visitors to the town. The plan does not include any specific proposals for this area, although it mentions that the removal of much through traffic and congestion will permit the remodelling of the Main Street to make the centre more pedestrian friendly.
- 7.2 This is being considered as part of the Bingley Town Centre Action Plan, which is being developed in conjunction with the UDP. A number of suggestions for the area around the Arts Centre have been considered, involving various degrees of change and, although no final plans have been approved, the Council has resolved that it should remain as public open space. However, the area is not identified as recreation open space under Policy OS2. The Council suggests that this would not have been appropriate in the light of advice in the version of PPG17 that was extant when the plan was prepared, as this referred to 2 hectares as the smallest in a hierarchy of categories of open space. However, Policy OS2 identifies all areas of recreation open space over 0.4 hectares and, although the Council proposes to change the policy by deleting the words "UNDER 0.4 HECTARES", no change is proposed to the explanatory text. Thus, since the area of this open space is stated by the Council to be 0.62 hectares, it should be specifically identified as being protected under Policy OS2. This would not prevent alterations to the character of the open space, but there are a number of policies in the Design and Natural Environment chapters of the RDDP which seek to preserve trees and wildlife habitats, and these policies would have to be taken into account in the consideration of specific proposals.
- 7.3 The objector also suggests that the gardens should be included within the conservation area, but this is a matter dealt with under other legislation, and cannot be considered as part of the UDP process.

Recommendation

- 7.4 **I recommend that the RDDP be modified by the allocation of Jubilee Gardens, Bingley as recreation open space under the terms of Policy OS2.**

SOM/S/CT1/328: Bingley Town Centre

Objector

2485/10691 *Professor R J Butler*

Summary of Objection

- There should be a reference to Three Rise Locks, and the walk from Micklethwaite Bridge to the Fisherman's pub, as a major attraction to the town.

Inspector's Reasoning and Conclusions

7.5 Under the sub-heading "Urban Design, Heritage and Public Art" the plan refers to the Leeds-Liverpool Canal, particularly the Five Rise Locks, as attracting visitors to the town. This does not imply that other parts of the canal are not an attraction, and I accept the Council's view that more information would unnecessarily add extra length to the document.

Recommendation

7.6 **I recommend that no modification be made to the RDDP.**

SOM/S/CT1/364: Main Street/Ferncliffe Road, Bingley

Objector

4364/10711 *Holgate Developments Ltd*

Summary of Objection

- The town centre boundary should be extended.

Inspector's Reasoning and Conclusions

7.7 The objection site lies to the south-east of the Primary Shopping Area of Bingley, and includes some land and properties within the town centre boundary, comprising the Magistrates Court and Police Station, together with a car park and area of open space, identified as a Town Centre Expansion Area.

7.8 The objector contends that the area defined as the Bingley Town Centre Action Area is too small to accommodate a foodstore of sufficient size to cater for the shopping needs of Bingley, and that the objection site could accommodate a larger format foodstore.

7.9 The provision for main food shopping in Bingley is seriously inadequate, with only a small Sainsbury's supermarket, and there is clearly a need for a larger foodstore if the town is to be restored to its rightful place in the retail hierarchy. The redevelopment of the Myrtle Walk area would provide for a significantly larger store than at present, in a location well related to the established shopping centre. However, if a larger area were required, I see no reason in principle why the car parking, or other ancillary development, could not extend onto the proposed Expansion Area on the opposite side of the new road

that would replace Chapel Lane. The objector also suggests that the site would not be viable to develop, and I do not doubt that it would be an expensive site to develop, involving demolition of existing buildings and new roads. However, I have no detailed evidence to support the objector's contention.

7.10 Development of the objection site would extend the already elongated town centre, particularly since any significant buildings would have to be sited beyond the Magistrates Court and Police Station. The land is sloping down in this direction, and this would tend to discourage shoppers from walking between a store on the objection site and the town centre, to the detriment of existing businesses.

7.11 The Plan also includes three further Expansion Areas and, whilst none of these would accommodate a major development, they provide a range of opportunities to improve the attraction of Bingley town centre, and all would consolidate rather than extend the town centre.

Recommendation

7.12 **I recommend that no modification be made to the RDDP.**

SOM/S/CR4/313: Menston Local Centre

Objector

4356/10710 *Cllr C I Greaves*

Summary of Objection

- Menston should be included as a local centre.

Inspector's Reasoning and Conclusions

7.13 Whilst Menston has a range of shops and other services appropriate to a local centre, they are spread over a considerable distance, and no single group is of sufficient size to justify definition as a local centre. In these circumstances, I accept the Council's view that it would not be possible to draw a boundary around a defined centre, within which Policy CR4 would apply. However, if there is a need for further retail development to serve the needs of the residents of Menston, this could be permitted, subject to compliance with Policies CR6 or CR7.

Recommendation

7.14 **I recommend that no modification be made to the RDDP.**

Chapter 8 Transport and Movement

S/TM5.2 & SOM/S/TM20/58: Shipley - Thackley - Idle Line

Objector

778/8405/6 *Mr A L Winder*

Summary of Objection

- Light railway should be considered on the former track from Shipley to the Thackley old station site in an effort to remove traffic from the roads.

Inspector's Reasoning and Conclusions

- 8.1 The Shipley - Thackley - Idle former railway line is shown within the RDDP as being protected under Policy TM5. It is also allocated as a cycleway improvement under Policy TM20. As the line passes through both the Bradford North and Shipley constituency areas the objection relates to both areas and has also been considered under BN/TM5.1.
- 8.2 Policy TM5 safeguards disused railway lines from development to allow their use for sustainable transport purposes. Such purposes may include rail schemes, cycle routes, pedestrian paths and bridleways. Although the Council has not indicated that the possibility of light rail is being actively considered, the proposed designations would not rule this out in the future. This in itself need not be incompatible with possible cycleway development.

Recommendation

- 8.3 **I recommend that no modification be made to the RDDP.**

S/TM5.3: Otley Branch Line

Objector

4596/9781 *Otley Golf Club*

Summary of Objection

- The land is in private ownership with no public access across it and is not available to contribute to any public transport route or footpath/cycleway.
- There is no reasonable prospect of a rail link ever being re-established over the site and there is therefore no reason to protect it.
- It has no relevance to the fulfilment of the aims of Policy S/TM20.7 relating to the Wharfedale Cycleway.

Inspector's Reasoning and Conclusions

- 8.4 The objection relates to the stretch of former railway line running east from the A65 to the district boundary. Within the RDDP it is shown as being protected under Policy TM5 and being subject to Policy TM20 relating to cycleway improvements. The question of whether the land is in private ownership is not one which should determine land use. Policy TM5 safeguards disused rail lines for sustainable transport purposes and these might include rail schemes, cycle routes, pedestrian paths and bridleways. The Council maintains that protection of this line is important in providing a potential link to the rail network for freight use or possibly for the extension of the Leeds Supertram. It is stated that gravel extraction from the Wharfe valley will be transported by rail freight to various destinations although I have been provided with no details of such proposals. The realism of this possibility, particularly in the absence of former bridges, and as the previous line to the south of Bradford Road is now occupied by the A660(T), must be open to doubt. Furthermore, I have not been provided with any details of the likelihood of the extension of Supertram beyond the main urban area of Leeds, although the West Yorkshire Transport Plan does indicate that in the longer term expansion would be sought, subject to feasibility studies being carried out.
- 8.5 In addition to these 2 possible uses for the line there is scope for the extension of a cycleway along it. Strictly speaking, a route along this part of the line might not constitute part of the Wharfedale Cycleway since it would not be linking Addingham, Ilkley, Burley in Wharfedale and Menston. Nevertheless, I consider the Council is correct to safeguard and promote the provision of any additional off-road route that might link into this cycleway, as part of its efforts to encourage cycling as a more sustainable form of transport.
- 8.6 Overall, although I have been provided with no details of possible freight use or the prospect of the extension of the Leeds Supertram, I consider that in the absence of any contrary alternative proposals for the objection site its protection under Policy TM5.3 should remain.

Recommendation

- 8.7 **I recommend that no modification be made to the RDDP.**

S/TM7.7: Baildon Station

Objector

1294/5377 *Miss Joan Hyde*

Summary of Objection

- Negotiation with the company that occupies the old station building to relocate could release land for expanded parking at the station to facilitate increased rail use.

Inspector's Reasoning and Conclusions

- 8.8 Policy S/TM7.7, relating to Park and Ride, indicates that the existing parking at Baildon station will be protected but that there are no opportunities to expand. There is a station

car park, which is restricted in size, to the south-western side of the old station building. The British Rubber Company occupies this building and the area to its rear and side. This area would provide the only realistic opportunity for additional car park provision in what is an established predominantly residential area.

- 8.9 I do not consider that the access from Ridgewood Close to the car park and station building poses any particular constraint to the possible expansion of parking, since this access serves the current car park. The gated access to the yard area associated with the present commercial use could be enlarged to provide better access. However, I recognise that without demolition of the traditional stone building, which I understand is not listed, the scope for providing additional car parking within this area, even if the present business was to be relocated, would be limited. Nevertheless, this may offer the opportunity within the life of the plan to provide some additional parking should the existing business move. I consider it would be appropriate for S/TM7.7 to be modified so that it is not as negatively worded.

Recommendation

- 8.10 **I recommend that the RDDP be modified by removing from Policy S/TM7.7 reference to there being no opportunities to expand.**

S/TM20.3: Wellington Street Link, Bingley

Objectors

2485/8431 *Professor R J Butler*
4510/9626 *Mr A J Plumble*

Summary of Objections

- The proposal would increase pedestrian severance.
- It would reduce the possibilities of developing the railway station forecourt as an interchange.
- It would act as a ‘rat-run’ to the Bingley Relief Road junction and put more pressure on the poor Park Road/Main Street junction.
- A route diversion would be created for public transport.

Inspector’s Reasoning and Conclusions

Background

- 8.11 As shown on the Proposals Map this highway improvement scheme in Bingley town centre would involve the formation of about a 200-metre length of the realigned and extended Wellington Street to Ferncliffe Road. This would provide a more direct link to this latter road than that which exists via Chapel Lane. The scheme has been carried forward from the adopted UDP. In the existing plan it was stated that the link would enable a better rationalisation of traffic in the town centre, which would allow the provision of an improved and safer environment for pedestrians and shoppers on Main Street. Improved access to the railway station and contributions to better parking facilities following completion of the Bingley Relief Road (BRR) were also cited as

advantages. Additionally, the principle of a link road was to be provided for as part of any future redevelopment of the retail core.

- 8.12 The concept of the Wellington Street link is closely tied to long-running discussion and consultation on planning and traffic management measures for Bingley town centre. Following protection of the line of the link in the adopted UDP further public consultation took place seeking views on the future of the town centre once the BRR was open. A Concept Plan was formulated putting forward a package of traffic management and environmental improvement initiatives. The Council indicates that a strong desire to relieve the centre of the town from the car and create a focal point to put the heart back into the town centre emerged from consultation. Although the objectors have queried this assessment and the consultation exercise generally, this is a separate matter to the consideration of the UDP and I make no comment on it. However, from the results of the consultation that I have seen I have no reason to doubt the Council's interpretation, based on the responses of those who actually participated in the exercise.
- 8.13 Improvements to Main Street to assist bus users and pedestrians were advocated by the Aire Valley Public Transport Commission. Restricted closure of Main Street except for buses and abnormal loads, in order to effect improvements to this road, is the Council's currently favoured option. However, whilst a decision was taken to commence construction of the Wellington Street link this has been deferred as it was not considered feasible for this to be done before completion of the BRR. The Council's current position regarding traffic management/environmental improvements is that detailed design of the link be continued, but that impact assessments will be undertaken of alternative ideas and considered in the light of my report on the RDDP.

Justification for the proposal

- 8.14 The Council maintains that the justification for the link remains essentially the same now as when the current UDP was adopted, with the overarching objective being to improve the vitality and viability of the town centre through increased economic activity and environmental improvement. The objectors have queried the subtle changing and broadening of the Council's objectives for the proposal; in particular, the notion that the link would enable most traffic to divert onto this road from Main Street, so enabling the latter to benefit from environmental improvements to make the central core of the town more attractive and safer for users as part of an associated traffic management plan. Whilst the RDDP acknowledges that the scheme has been carried forward from the adopted UDP, the only quoted justification is that it is intended to improve access to the railway station and contribute to better parking facilities following completion of the BRR.
- 8.15 However, it is the Council's position that the wording of the adopted plan should have been carried forward to the RDDP and that a drafting error has been responsible for the failure to include it. This being the case, I do not consider that the aims and objectives of the proposal have been fundamentally changed from the adopted UDP, since this clearly envisaged allowing for an improved and safer environment on Main Street for pedestrians and shoppers. There may have been some crystallisation of thought on the Council's part to tie the link with the more specific aim of allowing the enlargement and redevelopment of the Myrtle Walk shopping complex. In my view this, together with possible improvements to Main Street, falls within the definition of redevelopment of the retail core.

Use of the link

- 8.16 When the BRR is open this will considerably reduce the amount of through traffic in central Bingley, perhaps to about 40% of its present level, although it is possible that the figure will still be in excess of about 14,000 vehicles per day. If Main Street were to be closed to through traffic except buses, the Wellington Street link would be likely to accommodate most of what would have travelled along it, a probable 10- or 12-fold increase on the volumes carried now. The objectors believe that this would result in increased pedestrian/vehicle interaction with severance of pedestrian movements; it would make access to the rail station more difficult, as well as that to the town centre for pedestrians from the major residential areas to the north and east.
- 8.17 There would be increased vehicular use of the Park Road/Wellington Street and Wellington Street/Ferncliffe Road junctions and these would be points where pedestrian movements would be likely to be mostly concentrated. Detailed traffic management and road design are not matters for consideration here but it seems clear to me that signalised pedestrian crossing facilities would be a necessary component of any scheme. There is a possibility of slightly longer delays to pedestrians than occur now, and perhaps the channelling of movement to specific crossing points might result in some extra journey length. However, I do not consider these would be material disbenefits when viewed within the context of likely overall journey times and distances travelled, especially for those walking into town from the residential areas to the north and east.
- 8.18 Nor do I consider that it would lead to any materially greater severance or perceived separation of those shops and services, particularly along Park Road, to the eastern side of the railway and canal. Any such effect would also have to be set against the gains that might be achieved along Main Street. These could arise from creating a more pleasant central environment by the removal of most traffic there, and the better pedestrian linkages that could be forged between the shops, services and civic facilities to both sides of this road. Looked at in the round, I do not consider that the proposal would offend against the West Yorkshire Local Transport Plan's hierarchy of consideration. This puts pedestrians, emergency services and people with disabilities first in a sequential consideration of groups in the design process.
- 8.19 Wellington Street already provides a link between Park Road and Ferncliffe Road, albeit more circuitous than that contemplated in the proposal. A higher standard of road with a more direct alignment would be likely to encourage a greater number of vehicular movements along it. The objectors claim that it would act as a 'rat-run' to the BRR. To me a 'rat-run' implies the use as a short cut of a road not specifically designed for the purpose of distributing traffic. The actual level of use of the road would be subject to further consideration by the Council in the context of wider traffic management within the town centre. It presumably would be designed accordingly, taking account of the chosen management scheme and predicted traffic flows following the opening of the BRR. Pressure on the junctions of Park Road with Main Street and Wellington Street would be a matter of detailed traffic management and a function of whatever scheme was to be chosen. Localised deterioration of the environment in terms of noise and vehicle emissions might occur close to these junctions, particularly with the negotiation of 2 right-angled junctions close together. This has to be offset against the benefits that could be derived from the relief of traffic flows along the section of Main Street between Park Road and Ferncliffe Road and the general improvement to the environment there.

- 8.20 The RDDP proposes enhanced Park and Ride facilities within Bingley under Policy S/TM7.2. The detailed re-alignment of Wellington Street would be likely to cause a reduction in car parking spaces in the existing ‘pay and display’ car park alongside the station. The future redevelopment of Myrtle Walk could incorporate a multi-deck car park which, because of its proximity to the station, could be in part used for Park and Ride. This could also possibly allow the development of the existing ‘pay and display’ car park to the south of the station as a transport interchange, given that the restricted station forecourt is likely to be of insufficient size to be developed in its own right as an off-road bus/rail interchange. Detailed design of the road could incorporate bus stops close to the station for services using this road.
- 8.21 Other claimed advantages are that there would be improved access to the rail station. I can see that there may be advantages to bus operators from the removal of the somewhat circuitous route to and from Ferncliffe Road via Chapel Lane if an interchange were to be developed close to the station. I am not convinced, however, that the link would materially improve access to car parking in the area since, to my mind, there are no particular constraints at present. However, one of the link’s particular benefits would be to offer the opportunity for an enlarged and redeveloped Myrtle Walk shopping complex. Depending on the nature of any redevelopment here this could be a strong bolster to the viability and vitality of Bingley town centre, as well as offering scope for additional Park and Ride facilities, as already mentioned.

Objector’s alternative

- 8.22 Mr Plumbe has suggested an alternative to the provision of the link. This two-fold scheme would involve leaving traffic on Main Street whilst also creating a bus-only link road from Chapel Lane to Wellington Street, with access for cars to the existing Waterloo Road car park. The Chapel Lane to Wellington Street element would allow the provision of an interchange in front of Bingley Station, with no through link to Ferncliffe Road. Traffic would be moved along Main Street by integrated signalling to ‘platoon’ vehicles, allowing gaps in the flow to enable ready pedestrian crossing. Some evidence regarding the technical feasibility of constructing a link from Chapel Lane has been produced, although the Council is sceptical that a satisfactory design to present standards would be achievable. It also has concerns about the feasibility of movement of traffic along Main Street in the manner suggested, and the fact that allowing this regime would not result in the benefits and more congenial environment in the central section of the town that redistribution might bring. These are matters of detailed design and traffic management and no doubt could be subject to more detailed analysis together with other management schemes that the Council has undertaken to appraise.

National and regional policy

- 8.23 Both national and regional planning guidance has changed since the adoption of the present UDP and the objectors claim that the proposal does not in many respects comply with this. In particular, PPG13 and RPG12 strongly promote the integration of land use planning and transport. This is done by supporting regeneration, growth and sustainable development through reducing the need to travel especially by car, reducing the impact of traffic and travel on the environment, and improving access to opportunities in an equitable and socially inclusive manner. In that the proposal would be largely car-orientated and in itself would not promote the reduction of car use, it might be argued that the proposal would run counter to the thrust of this advice. However, I consider that to look at it in these terms is too narrow. When viewed in the wider context of potential

benefits to the regeneration of Bingley town centre I do not perceive there to be any fundamental conflict with the aims of national or regional transport policy or that relating to town centre development contained in PPG6.

Conclusion

- 8.24 The Council has not as yet produced costings, even rough figures, or impact assessments of the provision of the link, including those of what one of the objectors considers may be the costly crossing of the rail lines within the Bingley tunnel. No work has yet been done to analyse traffic flows since this was to await the opening of the BRR. The feasibility of providing the link on technical, economic and environmental grounds has not therefore been finally established. It might be argued that there is some inherent illogicality in its allocation in advance of such exercises. Nevertheless, detailed traffic management is not an issue for the RDDP. The plan merely seeks to protect the line of the proposed link. This would be on land all of which I understand is within the Council's control.
- 8.25 There may be no certainty that the link will come to fruition within the lifetime of the plan since it might yet prove to be not feasible, or alternative traffic management regimes for central Bingley may yet be favoured. Because the land that would be needed is within the Council's control inclusion of the proposal within the plan would not cause blight, even if ultimate provision of the link was not considered viable or alternative measures were favoured. Nevertheless, whilst the objectors have advanced substantive and well-argued cases it is my view that, on balance, there is insufficient reason to delete the allocation or to substitute the radically different alternative scheme as advocated by Mr Plumbe.
- 8.26 To ensure clarity, and to be consistent with the adopted UDP, I accept that the wording of the justification to the policy should be amended so that it is more in line with that within the existing UDP.

Recommendation

- 8.27 **I recommend that the RDDP be modified as follows:**

Delete the wording of the justification to the policy and replace with:

Carried forward from the adopted UDP. The scheme is intended to enable a better rationalisation of traffic in the town centre, which will allow the provision of an improved and safer environment for pedestrians and shoppers on Main Street. It will improve access to the railway station and contribute to better car parking facilities, following the completion of the Bingley Relief Road. The principle of a link road should be provided for as part of any future redevelopment of the retail core. A development brief will be prepared to ensure sensible landscaping and retention of the area's character.

S/TM20.4: A65 Manor Park Bends

Objectors

3473/6535 *Mr & Mrs Cockshott*
3858/3719 *Ilkley Civic Society*

Summary of Objections

- There is no need for more road development.
- The proposal is not included in the West Yorkshire Local Transport Plan.
- The area is environmentally important and the scheme could result in problems.
- The proposal to re-align the bends has been withdrawn and should therefore be deleted from the plan.
- The impact on Wharfedale traffic of the opening of the Bingley Relief Road needs to be taken into account as it may reduce traffic on the A65 significantly.
- Dangers should be avoided through speed restrictions, signage and enforcement. Access problems for residents should be resolved by providing turning facilities within their own properties.

Inspector's Reasoning and Conclusions

- 8.28 The proposed highway improvement relates to a stretch of the A65 and land to its southern side extending from close to the roundabout at the western end of the Burley bypass to beyond Saxon Lodge. The scheme would include the formation of a new single carriageway of about 800 metres in length to straighten out the stretch of road known as Manor Park Bends, off which the small residential area of Manor Park is served, including properties with direct vehicular access to the road. In the past, in response to the number of accidents on the road, the Highways Agency developed a scheme similar to that now envisaged. After the introduction of traffic calming measures in 1997, which led to a reduction in casualties, and in recognition that the road was due to be de-trunked, work was suspended on this. The road is now in the control of the Council.
- 8.29 In response to further accidents and public concern a bid was made to the Department for Transport for funding a similar scheme to that envisaged by the Highways Agency. The Department, whilst recognising the importance attached by the Council to the scheme, wishes to explore the benefits that might be offered by a lower cost option and/or more environmentally sensitive alternatives. This period of reassessment will give the opportunity for the impact of an introduced 40mph speed limit to be evaluated. Although not in the West Yorkshire Local Transport Plan, because at the time of its preparation the road was imminently to be de-trunked, the proposed scheme is now in the Local Transport Plan Annual Progress Report 2001/2002.
- 8.30 I consider that any improvements involving a re-aligned road would not represent an increase in capacity of the road network but would be a scheme to help, in particular, reduce road casualties. The introduction of a 40mph speed limit on the existing road may serve to reduce casualties, as claimed by objectors, although it is the Council's view that speeds are not generally excessive and it is the sub-standard road alignment which has contributed to the casualty rate. However, I concur with the Council that a new road would appear to offer the additional benefits of: allowing safer access to dwellings in Manor Park and a less polluted and noisy residential environment there; elimination of safety and congestion problems caused by cattle crossing the road; safer separated routes for pedestrians, cyclists and horse riders; and reduction in congestion, delay and transference of traffic caused by occasional flooding.
- 8.31 A re-aligned road would pass through attractive, treed pastureland within the Green Belt, and through a small area of washland. It would inevitably have some impact on this environment. However, any further improvements along the line of the existing road

may in themselves have adverse environmental impacts. The design of any scheme and the measures included to mitigate its impact and management of traffic are matters of detail. I have no doubt they would be subject to full consultation with the relevant bodies and agencies that would have an interest. Such consultation could presumably include the relevant rail bodies because of the proximity of the Ilkley to Burley railway line, in respect of which there are concerns regarding land slippage.

8.32 It appears to me that further improvements in one form or another to the A65 at Manor Park Bends are a strong likelihood. However, at present there is no certainty that one scheme will prevail over another, particularly as the impact of the new 40mph speed limit is still being evaluated and funding is not yet assured. The passage of time will also indicate whether the opening of the Bingley Relief Road has an impact on traffic volumes on the A65. The RDDP is not concerned with matters of detailed design in terms of proposed road schemes. Rather, the plan seeks to safeguard land relating to land use proposals and to draw attention to these. If, ultimately, improvements along the present alignment of the A65 were to be favoured then presumably the alternative scheme would be dropped. Despite the objectors' concerns I do not consider there to be a compelling case to modify the RDDP by deleting Policy S/TM20.4 or altering the notation on the Proposals Map.

Recommendation

8.33 **I recommend that no modification be made to the RDDP.**

S/TM20.7: Wharfedale Cycleway

Objector

1316/10889 *Mr John Weatherill*

Summary of Objection

- The proposal would involve the loss of land which has been incorporated into garden and planted with trees and shrubs.
- There would be a loss of private amenity, privacy and security with expense and disturbance in any construction work.

Inspector's Reasoning and Conclusions

8.34 The objection relates to a section of disused rail line situated between Menston Old Lane and the A65. It is shown on the Proposals Map as being subject to cycleway improvements and has the potential to link northern Menston with another former rail line from Otley to Burley in Wharfedale. The provision of off-road cycle routes would accord with the thrust of both PPG13 and the West Yorkshire Local Transport Plan, which seek to encourage more sustainable modes of transport. Although private land might be involved the development of any cycleway would proceed on the basis of purchase of land by agreement or through compulsory purchase. Concerns regarding security, protection of privacy and amenity, and construction would be for consideration at the detailed planning stage. I do not consider any modification to the RDDP to be necessary.

Recommendation

8.35 I recommend that no modification be made to the RDDP.

SOM/S/TM20/128: Trunk Road Link, Cottingley Bar to Canal Road

Objector

2828/5057 *Heaton Township Association*

Summary of Objection

- The termination of the Aire Valley Trunk Road (Bingley Relief Road - BRR) at Cottingley Bar is bound to increase the volume of traffic using Bradford Road through Saltaire and Cottingley New Road through Heaton and Manningham, to the detriment of the area.
- There should be a re-introduction of the Shipley Eastern Bypass around Saltaire and Shipley.

Inspector's Reasoning and Conclusions

8.36 The BRR has now been completed. The de-trunking of the A650 will take place in 2005/6 when responsibility for its maintenance and operation will pass to the Council. A study has been carried out to determine action that will be needed for traffic management on this route. The West Yorkshire Local Transport Plan (LTP) indicates the need for a route management strategy to complement and maximise the benefits of the BRR, with this being informed by the work of the Aire Valley Integrated Transport Commission and public consultation. The Aire Valley Integrated Transport Measures will incorporate bus priorities and cycling/pedestrian facilities between Frizinghall and Bingley. At this stage I consider that it is too early to judge what will be the impact of traffic on the Heaton area, the objector's main concern, and what strategic management measures should be introduced.

8.37 The possibility of an eastern bypass around Shipley and Saltaire was rejected some years ago and such a possibility does not feature in the LTP. There are considerable physical and environmental constraints, not least of which is the presence of the World Heritage Site of Saltaire, which would need to be overcome by such a scheme. In my view, the reintroduction of such a possibility in advance of assessments of the traffic implications of the opening of the BRR would be unrealistic. I therefore consider no modification to the RDDP is required.

Recommendation

8.38 I recommend that no modification be made to the RDDP.

SOM/S/TM20/330: Otley Road/Green Lane Highway Junction, Baildon

Objector

3151/9572 *Dr Mike Woods*

Summary of Objection

- Additional housing on Green Lane will exacerbate what is currently a poor junction. A roundabout is needed.

Inspector's Reasoning and Conclusions

8.39 The housing to which the objector refers is the allocation on site S/H2.2. This is carried forward from the adopted UDP. The RDDP indicates that whilst it is close to Shipley town centre, the railway station and a high-frequency bus route it is constrained by the need for off-site highway improvements to the junction of Green Lane and Otley Road. Development of the site will not progress until improvements are carried out. This junction is now shown within the RDDP as being safeguarded to allow improvement. The scope of any improvements, and whether these might include a roundabout, are matters for detailed design consideration and not something to be addressed by the replacement UDP.

Recommendation

8.40 **I recommend that no modification be made to the RDDP.**

Chapter 10 Built Heritage and the Historic Environment

SOM/S/BH7/329: Bingley Town Centre Conservation Area (BH7- BH13)

Objector

2485/10690

Professor R J Butler

Summary of Objection

- Section 10 does not say what will be done to conserve Bingley town centre and what buildings, if any, are to be preserved.

Inspector's Reasoning and Conclusions

- 10.1 The objector considers there should be clearer definition of 'conservation', and the key buildings within the town should be listed. Section 10 of the Shipley Proposals lists the conservation areas within the constituency area and also refers to Policies BH7 – BH13. In my view it is clear that the reference to these policies, which appear in the Built Heritage and Historic Environment Chapter of the Policy Framework of the RDDP, indicates that the policies will be applied within the conservation areas listed.
- 10.2 Paragraph 10.34 of the RDDP Policy Framework also states that the boundaries of the conservation areas in the district are being reviewed as part of a programme of Conservation Area Assessments. These will include strategies for the preservation and enhancement of these areas. Such an assessment is taking place for Bingley and one of its aims is to assess the action that may be necessary to safeguard and enhance the special interest of the area. It also provides a schedule of listed buildings within the conservation area which are protected under the relevant legislation. I share the Council's view that such assessments are the more appropriate vehicles for setting out the detail of action appropriate for individual conservation areas. To include within the RDDP all listed buildings, or those considered by the Council to be worthy of preserving, would unduly lengthen the plan.

Recommendation

- 10.3 **I recommend that no modification be made to the RDDP.**

Chapter 11 Community Facilities

SOM/S/CF3/46: Crow Nest/Jer Wood, Bingley (S/H2.6)

Objector

1799/8271 *Ms Dawn Noutch*

Summary of Objection

- The allocation of the site for housing should be deleted and the site should be retained for community use.

Inspector's Reasoning and Conclusions

11.1 I have considered this site in relation to S/H2.6, where I recommend that the site be allocated as recreational open space under Policy OS2.

Recommendation

11.2 **I recommend that the RDDP be modified by the allocation of the site as recreational open space under Policy OS2.**

SOM/S/CF3/182: Former Ferniehurst First School, Valley View, Baildon (S/H1.8)

Objectors

225/8216 *Mrs Lorraine Behrens*
1343/9691 *Mrs Julia Donoghue*

Summary of Objections

- The land should be used for a community building, not for housing.

Inspector's Reasoning and Conclusions

11.3 I have considered this site in relation to S/H1.6-1.8 above, where I conclude that the housing allocation is appropriate.

Recommendation

11.4 **I recommend that no modification be made to the RDDP.**

SOM/S/CF3/202: Ferniehurst Farm, Baildon Wood Court, Baildon (S/H1.6)

Objectors

225/8223 *Mrs Lorraine Behrens*
1343/9692 *Mrs Julia Donoghue*

Summary of Objections

- The land should be used for a community building rather than for housing.

Inspector's Reasoning and Conclusions

11.5 I have considered this site in relation to S/H1.6-1.8 above, where I conclude that the housing allocation is appropriate.

Recommendation

11.6 **I recommend that no modification be made to the RDDP.**

SOM/S/CF3/303.02: Land adjacent to Parkside School, Cullingworth (Site B)

Objector

4233/8951 *Mrs Margaret Perris*

Summary of Objection

- The land should be deleted from the Green Belt and allocated for playing fields in association with the adjoining Parkside School, and as additional community facilities.

Inspector's Reasoning and Conclusions

11.7 The site forms part of a well-maintained pasture adjoining the school site and outside the developed area of Cullingworth. The remainder of the land is considered in relation to SOM/S/H1/303.01. The question of additional playing fields for the school has also been considered in relation to S/E1.12 and S/E1.13 above.

11.8 I have no compelling evidence that additional playing fields are required, and in any event such use is appropriate within the Green Belt. Therefore, removal of this land from the Green Belt is neither necessary nor justified.

Recommendation

11.9 **I recommend that no modification be made to the RDDP.**

SOM/S/CF3/357: Community Facility Provision, Baildon

Objectors

932/10357 *Baildon Community Council*
935/10358 *Mr A M (Sam) Micklem*

Summary of Objections

- There is a need for a new community facilities building in this part of Baildon, particularly as schools which provided such facilities have been closed.
- Money should be found to enable provision to be made, and a site should be allocated.

Inspector's Reasoning and Conclusions

11.10 These objections are related to objections to sites S/H1.6 - 1.8 (see above). On the question of need the Council cannot say whether or not there is a need, because no overall assessment has been made of needs in the district. The objectors provide evidence of need which is not really countered by the Council.

11.11 Ferniehurst School, which has been closed and demolished, provided for various facilities which were well used. The area includes pockets of deprivation, and young people, for example, congregate on streets and are at risk of alcohol and drug abuse. There are some facilities at the Community Link Building on Cliffe Avenue and at the recreation centre at Green Lane/Otley Road. The former building is too small to meet demands and neither building is in good condition. A sports centre is planned for the Salt School but funding does not appear to be guaranteed, and the need is not only for sports provision. Objectors have supplied a copy of a report entitled "Lower and Middle Baildon Community Building Research" which identifies an urgent need overall and a need for general community purposes as well as for sport.

11.12 The evidence given to me clearly points to there being a need for a community facilities building in this area of Baildon. However, I do not have the evidence to conclude on the comparative seriousness of the need in a district-wide context.

11.13 The Council does not have a programme of provision of facilities. Work is underway with Sport England and this will lead to Council investment, but there is no indication that Baildon will emerge as a priority for any investment which might be available. Baildon is not identified as a Community Priority Area. The objectors and local groups are not in a position to finance the community provision without help, and a source of realistic help has not yet been secured. The development of the 3 housing sites at Ferniehurst would produce about 100 new dwellings, but this in itself is unlikely to give rise to a level of need which would justify an insistence on the developer financing a community building.

11.14 My conclusion overall is that a community facility, although needed, is not a realistic prospect. No allocation should therefore be made.

Recommendation

11.15 I recommend that no modification be made to the RDDP.

SOM/S/CF3/408: St Michael's Church, Littlelands, Cottingley Hospital Land

Objector

4176/11126 *Revd S J Pinnington*

Summary of Objection

- The site should be allocated for community facilities.

Inspector's Reasoning and Conclusions

11.16 This is part of an island site, surrounded by roads, the remainder of which is occupied by a Community Resource Centre and the vicarage. To the east are a public house and a small group of shops. The church was being demolished at the time of my site visit, but the site is clearly well located for continued community use if there is an identified need, and this would be covered by the provisions of Policy CF3. However, the RDDP does not allocate sites for community uses, other than schools and hospitals where there is an existing commitment, and I see no need to include a specific allocation for this site.

Recommendation

11.17 **I recommend that no modification be made to the RDDP.**

SOM/S/CF4/307, SOM/S/GB1/307, SOM/S/CF4/308 & SOM/S/GB1/308: Yorkshire Clinic & Cottingley Hall, Bradford Road, Cottingley

Objectors

4211/10709 & *The Yorkshire Clinic*
9020
4209/10708 & *Bupa Care Services*
9607

Summary of Objections

- The sites should be excluded from the Green Belt, and allocated under Policy CF4.

Inspector's Reasoning and Conclusions

11.18 These are two adjoining sites within the narrow area of Green Belt between Cottingley and the main Bradford/Shipley/Baildon urban area. Also within this gap are schools, playing fields and a hotel, together with extensive highway works associated with the Bingley Relief Road. Hence this is not rural countryside but, despite the number of substantial buildings, it retains a predominantly open character, and provides separation between the main urban area and Cottingley. I appreciate that this could restrict the amount of additional development that could take place on the sites, but this is not an exceptional circumstance which would justify removal of the sites from the Green Belt.

11.19 Policy CF4 would be permissive of further development, which could conflict with the Green Belt policies of the plan. It would therefore be inappropriate for these sites to be allocated under Policy CF4.

Recommendation

11.20 **I recommend that no modification be made to the RDDP.**

Chapter 12 Open Land in Settlements

S/OS1.1 & SOM/S/OS2/315: Land between the River Aire & the Leeds-Liverpool Canal, North of Bingley

Objector

4511/9631 & *Bingley Environmental Transport Association*
9635

Summary of Objections

- This is ‘exchange’ land proposed by the Highways Agency for public open space/playing fields taken at Crossflatts Playing Fields adjacent to Queens Road.
- It is covered by statute and should be designated as recreation land and public open space.

Inspector’s Reasoning and Conclusions

12.1 The site, which comprises a predominantly open, grassed field, is part of a larger area of open land designated as urban greenspace lying between the new Bingley Relief Road (BRR) and the Leeds-Liverpool Canal. There is another area of urban greenspace further to the west centred on Bingley Grammar School and cemetery. I consider the objection land to be an integral component of this wider area, which makes an important contribution to the character of this part of north Bingley. The land is to be used as replacement land for that lost at Crossflatts through the building of the BRR. Although the objector states that this exchange is covered by statute no details have been provided and the Council has not been able to comment on this.

12.2 On completion of the BRR the Council proposes to manage the land as a nature reserve that will be used for grazing, with public access along footpaths and an informal fenced-off picnic and sitting area near the canal. Such use would not equate with recreation or playing field use. However, I agree with the Council that it would be inappropriate to use the land as recreation open space. Such use would imply potentially more intensive use of the land and, because it forms part of Bingley North Bog, this could result in damage to its nature conservation value. Accordingly, I do not consider any modification to the plan to be necessary, and the land should continue to be protected under Policy OS1.

Recommendation

12.3 **I recommend that no modification be made to the RDDP**

S/OS1.5: Wrose Brow to Idle Hill

Objectors

1751/8990 *Mr & Mrs J A Romani*

Summary of Objection

- The policy and/or its implementation should allow for a supervisory dwelling to be built on this site, where there are already buildings. A Section 106 agreement would enable the dwelling to be tied to the management of the land. Without a dwelling, investment in improving the land would be wasted through trespass and vandalism.

Inspector's Reasoning and Conclusions

- 12.4 The objection is not seeking to change the allocation of the land. The implementation of policies is a matter for the Council, once the UDP has been adopted. As for the wording of the policy, no new wording is suggested by the objectors. Wording changes to refer to one site would not be appropriate where the policy is concerned with many large areas of land. To reword the policy to allow for supervisory dwellings to deal with trespass and vandalism generally in urban greenspaces would result in significant numbers of single dwelling developments, to the detriment of the character of the open areas.
- 12.5 The policy is right to seek to retain the open and green character of urban greenspaces. Developments which achieve these objectives are permitted by the policy, and there is specific reference to management plans as part of proposals which are acceptable under the policy. Whether such a scheme could be acceptable on the objection site is a matter for discussions between the objectors and the Council. The specific circumstances of the site would be taken into account, including the character of the land, the impact of a dwelling in the light of the stables already on site, and the nature of the problems experienced and improvements offered by the owners.

Recommendation

- 12.6 **I recommend that no modification be made to the RDDP.**

S/OS1.9: Baildon Bank

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The area functions as Green Belt and there have been no changes in circumstances to justify its removal from the Green Belt.
- This open countryside would be easier to protect from development if it were kept as Green Belt.
- There is a shortage of recreation open space in Baildon. The land is also important for its wildlife, landscape, and historical value. It forms the backdrop to the Saltaire World Heritage Site.
- Baildon is over-developed.

Inspector's Reasoning and Conclusions

- 12.7 I have considered this site in relation to S/GB1.2 below.

Recommendation

12.8 See my recommendation in respect of S/GB1.2 below.

S/OS1.11: Poplars Farm, Bolton Woods

Objector

4122/5491

Brighthouse Estates Ltd

Summary of Objection

- The Bolton Woods quarry buffer zone does not function as urban greenspace, and its identification as urban greenspace in the RDDP is too restrictive.

Inspector's Reasoning and Conclusions

12.9 In fact the objection as summarised in the objector's final written representation is much narrower than the duly made objection, being concerned only with the risk of locating an urban greenspace near an active quarry face. Nevertheless, as the objection as originally set out has not been withdrawn, I deal with all the arguments originally advanced.

12.10 Both the buffer zone and the urban greenspace are partly in Shipley constituency and partly in Bradford North.

12.11 The urban greenspace is widest at its south-western end, where it is also steep and prominent in views from other parts of Bradford. This part of the allocation plays an important part in the wider urban scene. Behind this west-facing slope the higher part of the open space narrows between housing on one side and the quarry face of Bolton Woods quarry on the other. In my opinion, this eastern end of the urban greenspace has a more local function. The north-eastern end of the urban greenspace is particularly narrow. The principal function is as a buffer between the housing and the present and future working areas of the quarry. The main separation between different sections of the urban area is achieved by the quarry itself. The eastern end of the allocated urban greenspace is not, in the words of paragraph 12.5 of the RDDP Policy Framework, one of the most significant greenspaces in terms of size or prominence within the urban area. It does not bring the character of the countryside into the town, and it can be distinguished from the remainder of the area in terms of its function.

12.12 I understand that some at least of the land is owned by the Council, and, on the basis of the representations and my own observations, that it is used for informal recreation. I do not have sufficient information to allow me to conclude whether the eastern area should be allocated under another open space policy, but the urban greenspace allocation is not in my view appropriate for the eastern end of the area. Again, I do not have the evidence to enable me to advise the Council where the eastern boundary of the urban greenspace should be drawn (i.e. exactly which part of the land is not prominent in views), and so my recommendation is couched in general terms. However, the Council will be able to assess exactly which parts of the land function as urban greenspace and which have a lesser and/or different function.

12.13 The safety of users of the land is, as far as I am aware, primarily a matter for the owners of the land and the users themselves. Insofar as it is a town planning matter, I consider that both it, and the restrictions it may impose on the operation of the quarry, are outweighed by the significance as open space of the western part of the urban greenspace.

Recommendation

12.14 **I recommend that the RDDP be modified by the deletion of the eastern end of the Poplars Farm area from the urban greenspace.**

SOM/S/OS1/1: Sty Lane, Micklethwaite (S/H2.10)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- This should be an urban greenspace, not a housing allocation.

Inspector's Reasoning and Conclusions

12.15 I have considered this site in relation to S/H2.10 above, where I conclude that the housing allocation is appropriate.

Recommendation

12.16 **I recommend that no modification be made to the RDDP.**

SOM/S/OS1/46: Crow Nest/Jer Wood, Bingley (S/H2.6)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The housing allocation on this site should be deleted and the land retained as open space.

Inspector's Reasoning and Conclusions

12.17 I have considered this matter in relation to S/H2.6 above, where I note that the housing allocation has been deleted from the RDDP and the site left unallocated. I consider that the site should be retained as open space and allocated under Policy OS2.

Recommendation

12.18 **I recommend that the RDDP be modified by the allocation of the site as recreation open space under Policy OS2.**

SOM/S/OS1/48: Stanley Street, Bingley (S/H1.15)

Objectors

3543/8146 *Cllr Colin Gill*
3935/5060 *Councillor David Heseltine*
4101/5061 *Miss I Peake*

Summary of Objections

- This former children’s play area is urban greenspace used for informal recreation and lock-up garages.

Inspector’s Reasoning and Conclusions

12.19 I have considered this site in relation to S/H1.15 above, where I conclude that the housing allocation is appropriate.

Recommendation

12.20 **I recommend that no modification be made to the RDDP.**

SOM/S/OS1/125: Clarendon Road, Gilstead (S/H1.12)

Objector

2803/9700 *Bradford Urban Wildlife Group*

Summary of Objection

- The housing allocation of the land should be deleted and the site retained as open space.

Inspector’s Reasoning and Conclusions

12.21 I have considered this matter in relation to S/H1.12 above, where I note that planning permission for housing development has been granted. Accordingly, such development can take place and, therefore, it is not appropriate to alter the RDDP allocation.

Recommendation

12.22 **I recommend that no modification be made to the RDDP.**

SOM/S/OS1/171.01: Warren Lane, (north-west part of S/H1.10), Eldwick

Objector

896/10552 *Mrs Dorothy Isaac*

Summary of Objection

- The land should be retained as open space rather than allocated for housing.

Inspector's Reasoning and Conclusions

12.23 I have considered this matter in relation to S/H1.10 above, where I conclude that, as planning permission has been granted for residential development, it is not appropriate to delete the RDDP allocation.

Recommendation

12.24 **I recommend that no modification be made to the RDDP.**

SOM/S/OS2/46: Crow Nest/Jer Wood, Bingley (S/H2.6)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The land should be retained for open space use instead of being allocated for housing.

Inspector's Reasoning and Conclusions

12.25 I have considered this matter in relation to S/H2.6 above where I note that the housing allocation has been deleted from the RDDP. I conclude that the site should be retained as open space under Policy OS2.

Recommendation

12.26 **I recommend that the RDDP be modified and the site allocated for recreation open space under Policy OS2.**

SOM/S/OS2/47: Ellar Gardens, Menston (S/OS7.3)

Objector

27/4502 *Mr J H Drake*

Summary of Objection

- The land should be additionally designated as recreation open space.

Inspector's Reasoning and Conclusions

12.27 I have considered this objection in more detail in respect of S/OS7.3, to which reference should be made. The Council accepts that the site should have protection both as village

greenspace and as recreation open space. I have concluded that these are the correct designations for this area.

Recommendation

12.28 **See my recommendation in relation to S/OS7.3 below.**

SOM/S/OS2/48: Stanley Street, Bingley (S/H1.15)

Objectors

1899/11789	<i>Mr Keith Thompson</i>
1901/6707	<i>Mrs Muriel Thompson</i>
2008/11357	<i>Mrs Alice E Sheehan</i>
2106/11358	<i>Miss Angela Coulton</i>
2347/4506	<i>Miss Claire Moseley</i>
2350/4509	<i>Mr Phil Parry</i>
2620/11359	<i>Mrs Katie Miller</i>
2623/11360	<i>Mr Michael Wilkinson</i>
2876/4507	<i>Mrs June Sanderson</i>
2960/8295	<i>Mr Michael Leslie</i>
3508/3489	<i>Better Bingley Campaign</i>
3571/6894	<i>Ms Joy McMillan</i>
3766/11363	<i>Mr Bob Adsett</i>
4473/9296	<i>Miss Claire Farish</i>
4474/9298	<i>Miss Carole Farish</i>

Summary of Objections

- This open space should be retained in recreational use and not be a housing site.

Inspector's Reasoning and Conclusions

12.29 I have considered this site in relation to S/H1.15 above, where I conclude that the housing allocation is appropriate.

Recommendation

12.30 **I recommend that no modification be made to the RDDP.**

SOM/S/OS2/49: St Philips Drive, Burley in Wharfedale (S/H2.9)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The site is used for informal recreation and should be designated as public open space.

Inspector's Reasoning and Conclusions

12.31 I have considered this site in relation to S/OS7.1 below, where I conclude that the land should be designated as recreation open space.

Recommendation

12.32 **See my recommendation in relation to S/OS7.1 below.**

SOM/S/OS2/50: Burley Hall, Burley House & Woodhead Beck (S/OS7.1)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The site is used for informal recreation and should be designated as public open space.

Inspector's Reasoning and Conclusions

12.33 I have considered this site in relation to S/OS7.1 below, where I conclude that the land should be designated as recreation open space.

Recommendation

12.34 **See my recommendation in relation to S/OS7.1 below.**

SOM/S/OS2/51: Former Tong Park First School, Baildon (S/E1.2)

Objector

4295/6875 *Ms Annie Barker*

Summary of Objection

- The land should be allocated for open space use rather than for employment.

Inspector's Reasoning and Conclusions

12.35 Allocation for any use would be inappropriate, following the completion of a housing development on the site, and the RDDP makes no allocation.

Recommendation

12.36 **I recommend that no modification be made to the RDDP.**

SOM/S/OS2/125: Clarendon Road, Gilstead (S/H1.12)

Objector

3935/5059 *Councillor David Heseltine*

Summary of Objection

- The land should be retained for open space purposes.

Inspector's Reasoning and Conclusions

12.37 I have considered this matter in relation to S/H1.12 above, where I note that planning permission has been granted for residential development on the site. Accordingly, such development can take place and, therefore, the RDDP allocation should be retained.

Recommendation

12.38 **I recommend that no modification be made to the RDDP.**

SOM/S/OS2/358: Cleasby Road, Menston

Objector

3954/10557 *Mr B Matlin*

Summary of Objection

- There should be formal identification of the site as land on which development will not be permitted.

Inspector's Reasoning and Conclusions

12.39 I have considered this objection in relation to S/OS7.7 below, to which reference should be made.

Recommendation

12.40 **See my recommendation in relation to S/OS7.7 below.**

SOM/S/OS2/359 & SOM/S/OS7/359: Butterfield Park, Moor Lane, Menston

Objector

3954/10559/60 *Mr B Matlin*

Summary of Objection

- There should be formal identification of the site as one on which development will not be permitted.

Inspector's Reasoning and Conclusions

- 12.41 This is a small area of grassed and treed land set out as a publicly accessible area of informal recreation open space (ROS), with seating, on the western fringe of Menston. It measures only some 0.12 hectares and therefore falls below the Council's threshold of 0.4 hectares for identifying land on the Proposals Map as ROS. This threshold has been applied consistently throughout the plan area and I do not consider there to be any justification for making an exception and formally identifying the land as ROS in this case.
- 12.42 Policy OS2 provides protection to sites used as ROS below 0.4 hectares and Policy OS8 protects small areas of land from development within Menston which are important to the character, visual amenity and local identity of the settlement. No modification to the plan is therefore necessary.

Recommendation

- 12.43 **I recommend that no modification be made to the RDDP.**

S/OS4.1 & SOM/S/GB1/205: Dowley Gap Lane, Dowley Gap, Bingley

Objector

2803/8833 & *Bradford Urban Wildlife Group*
8289

Summary of Objections

- The land should be designated as Green Belt to prevent development that would harm the nature conservation interest of the site, and it should be used as recreational open space.

Inspector's Reasoning and Conclusions

- 12.44 The land comprises a field between a public house and a site allocated in the RDDP for employment use (see S/E1.4 above). It is allocated in the RDDP for recreation open space "to be linked to development of the adjoining employment site".
- 12.45 I understand that the land includes a lower-lying area that at times forms a pond with similar attributes to the nearby Bingley South Bog SSSI. However, the land does not benefit from any formal nature conservation designation. The RDDP envisages that the land would remain open as an informal recreational area associated with the nearby canal rather than be the subject of any development. As such, the nature conservation interest should not be unduly threatened.
- 12.46 In terms of inclusion within the Green Belt, the purposes of such designation do not relate to nature conservation or indeed landscape quality. Green Belt is intended to prevent development that would threaten the openness of the area. In addition, PPG2 requires that a boundary defensible in the long term should define the extent of the Green Belt. The boundaries of the objection site do not provide such a characteristic, whereas the existing Green Belt boundary along Dowley Gap Lane does. I conclude, therefore, that inclusion within the Green Belt is not necessary or appropriate in this case.

Recommendation

12.47 I recommend that no modification be made to the RDDP.

S/OS4.2, S/OS4.4 & SOM/S/H1/311: Jenny Lane, Baildon

Objectors

801/929,930 *Mrs L Worsley*
4182/9016/17 *Diocese of Leeds*
& 9604

Summary of Objections

- The previous UDP Inspector concluded that the site should be allocated for housing, and the adopted UDP does so allocate the land. The location is particularly suitable for housing.
- No reason is given by the Council as to why the site should be allocated for new recreation open space and playing fields.
- Housing development would round-off the settlement.
- The playing fields are misused.

Inspector's Reasoning and Conclusions

12.48 A new version of PPG17, the national policy document concerning open space, sport and recreation, has been published since the previous Inspector reported on this site. It is the new policy which informs my conclusions and recommendations.

12.49 The clear intention to tighten the protection of playing fields and open spaces was announced in the press release which accompanied the publication of the new policy. Existing open space should not be built on unless an assessment has been undertaken which shows that the open space is surplus to requirements. Open space of particular value to a local community should be given protection through appropriate policies in plans. Outdoor sports facilities can have public value whether they are in public or private ownership.

12.50 I deal first with the site excluding the disused former allotments.

12.51 The objection land is existing open space. Most of it is laid out and/or used for recreation or sport. The children's playspace in the south-eastern corner could be replaced in a housing development, but most of the remainder of the area is also in use. North of the playspace is an area with pitch markings, and north again is a larger marked-out football pitch with goalposts in place. The latter pitch has the benefit of floodlighting on posts on its north side. The smaller pitch near the playspace has floodlighting on posts located on the edge of the cricket club's ground, on the opposite side of the public footpath which runs along the eastern side of the objection site. The Council also draws attention to supporting information supplied by a local group, illustrating the use of the land as a community resource by local groups and for local functions.

12.52 The evidence is that the site is largely laid out, maintained and used for recreation and sport.

- 12.53 The Council has undertaken an assessment of pitches in the district. The objection site facilities were not included in this, but they clearly exist and are used. They cannot be considered surplus to requirements on the basis of the assessment: there are significant deficiencies in mini and junior soccer provision in the constituency. There is no recent assessment of provision for the other more informal functions of open space from which to conclude that the site is surplus to informal requirements. The objectors have not carried out an assessment which accords with the PPG17 guidance: they have not consulted the local community. The offer of playspace and a mini pitch by the Diocese of Leeds would result in a loss of open space overall.
- 12.54 It may be that the land offers poor quality facilities, and is underused. Evidence comparing this site with other open spaces is lacking, and one cannot conclude that the land is surplus to requirements on this basis. Even if quality and level of use are less than desirable, this is not to say that there is no need for the facilities. National policy is for local authorities to seek opportunities to improve the value of existing facilities. There have been opportunities for the Council to buy the land, but it seems unlikely that the Council would now be able to fund the purchase. Nevertheless, the Council could lease the land. The possibilities of improvement, if improvement is necessary, could be investigated using the resources of the Council, the local community, and the neighbouring rugby and cricket clubs. Should resources not be available, one is left with the consideration that the land serves open space purposes. Against the background of national policy, and considering matters over the long term, I do not assume that the Diocese of Leeds would prevent access to the land.
- 12.55 That the site is used is itself evidence of its value to the local community. Value attaches to the fact that the facilities are also laid out and maintained, and to the availability of floodlighting. The efforts the community has made to secure the protection of the open space prove that local people regard the land as valuable to them in its present use and condition.
- 12.56 I conclude that all of the above factors point to a need to protect the recreational and open space uses of the land. The possibility that development might be regarded as rounding-off is peripheral to this principal issue. I have, however, taken account of points made by one objector to the effect that the location of the site renders it particularly valuable for residential use. The proximity to services does constitute a cogent argument for housing to be located here, but in my opinion this does not outweigh the matters which tell against housing development. As far as local needs and demands for housing are concerned, I do not support the allocation of housing on a market area basis (see the Policy Framework volume of this report). Nor do I see a local shortage of housing sites being a problem: sites are allocated in Baildon in both phases of the plan. Finally, the problems of misuse of the playing fields referred to by one objector are general problems. Insofar as they can be solved on a site-specific basis, they are management issues.
- 12.57 Overall, I conclude that the land should not be allocated for residential development. There remain the questions of what to do about the former allotments and of which policy the site allocation should be dependent upon. The strip of land which was once used as allotments is narrow and apparently contains protected trees. I have no evidence that the land could accommodate a housing development satisfactorily. Nor is there specific evidence that it will be brought back into recreational use. Accordingly, I consider that the former allotments should be unallocated on the Proposals Map. The remainder of the site is, as I have said, existing recreation land and the great majority is used as playing fields. The Proposals Map notation should therefore be under the terms of Policy OS3.

There are consequential changes in the Shipley volume, deleting the references to this site under Policy OS4. As this is the only site listed under playing fields in the Shipley constituency volume, the whole of the playing fields section will need to be deleted. There is no equivalent section of the constituency volumes for Policy OS3.

Recommendation

12.58 I recommend that the RDDP be modified as follows:

- [a] PROPOSALS MAP – delete the Policy OS4 allocation from the Jenny Lane objection site, and allocate the land, excluding the former allotments, as playing fields under the terms of Policy OS3.**
- [b] SITE REFERENCE S/OS4.2 – delete the heading and paragraph from the Shipley constituency volume.**
- [c] SECTION HEADED “PLAYING FIELDS” – delete the whole section from the Shipley constituency volume.**

SOM/S/OS4/356: Proposed ROS adjacent to Former Ferniehurst School, Baildon

Objector

935/11405

Mr A M (Sam) Micklem

Summary of Objection

- Level open space is needed locally to accommodate the elderly and mothers with prams.

Inspector’s Reasoning and Conclusions

12.59 Open space is proposed north of the former school buildings, to replace that to be lost when the housing allocation at the school site is developed. Details of the open space layout and facilities are not matters for me.

12.60 However, the Council has omitted to include this proposal in the plan’s written statement. The Council’s evidence contains a suggested section to make up for this oversight. The wording will need to reflect the phasing of the housing allocation.

Recommendation

12.61 I recommend that the RDDP be modified by the inclusion in the Shipley constituency volume of the following wording:

S/OS4.5 LAND ADJACENT TO THE FORMER FERNIEHURST FIRST SCHOOL, VALLEY VIEW, BAILDON

New site identified to replace incidental open space surrounding the former school. The site is to be laid out as part of the development of the phase 1 housing site S/H1.XX.

S/OS7.1, SOM/S/OS2/50, S/H2.9, SOM/S/OS2/49 & SOM/S/OS7/9: Burley Hall, Burley House and Woodhead Beck, Burley in Wharfedale (including St. Philip's Drive housing allocation)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The whole area is used for recreation and should be designated as public open space.
- Burley is over-developed. Services and infrastructure are under strain.
- Development of the housing allocation would cause visual harm to the Green Belt.
- Constraints on the proposed housing site would make development difficult.
- More housing would result in additional car journeys.
- The housing allocation site floods.
- The proposed housing land forms part of the open setting of Burley House, a Grade 1 listed building.

Inspector's Reasoning and Conclusions

The Northern End of the Objection Land

12.62 The area north of Burley House is described by the Council as objection site 1. The Council agrees that this land should be designated as recreation open space under Policy OS2. As the site has been laid out as open space, I concur.

The Housing Allocation: Effects on Listed Building Setting

12.63 The open land south of Burley House is described by the Council as objection site 2. The housing allocation H2.9 is the southern part of objection site 2.

12.64 The immediate curtilage of Burley House now is smaller than it originally was. The 1788 letting particulars show that the lawn and shrubbery were divided from the farm by a sunken fence. As the same particulars tell us that "The house and its appendages of garden, orchard, shrubbery etc. include 2 acres of ground", I consider that the sunken fence referred to was the ha-ha a short distance south of the present southern boundary of the grounds. Only a short length of this is now clearly visible, but its presence can be detected on the 1851 Ordnance Survey map, with the garden to the north. For the ha-ha further south, within the housing allocation site, to have been the one referred to in 1788, the "house and its appendages" would have had to be significantly larger than 2 acres (0.8 hectares).

12.65 Nevertheless, the southern ha-ha must, in my opinion, have had a function related to the house. As a stock-proof barrier designed to be invisible from one side, it would have played a part in the landscape. It is designed to be invisible from the south elevation, and perhaps the south garden, of the house. The south elevation is one of the 2 principal elevations, and overlooked "the farm" mentioned in documents of 1788. My expectation would be that the southern ha-ha would have protected parkland immediately south of the house and garden from other agricultural land to the south of the ha-ha. The parkland would probably have been managed, perhaps to a different regime from the rest of the

farm, to provide a picturesque nearby prospect seen from the house and garden. The northern ha-ha would have kept the parkland animals out of the garden.

- 12.66 I do not go so far as to say that the whole site north of the southern ha-ha gives, today, the impression of a designed landscape: I am not able to say without evidence what survives from the 18th century. Also, the above description of the function of the ha-has is based on informed supposition. Even if it is incorrect, the southern ha-ha must, in my view, have played a role in the landscape associated with the house, because of its position and because of the usual functions of such barriers.
- 12.67 I conclude that the ha-ha was part of the landscape associated with this important listed building, and is part of the setting of the building. The ha-ha could be preserved as part of a housing development, but, divorced from its surrounding open land and separated from the house by new building, its purpose would be more difficult to appreciate. I note that the ha-ha is in fact visible from the listed building. The development of the housing allocation would harm the setting of the Grade 1 listed Burley House, which forms part of Burley Conservation Area.
- 12.68 As far as I am aware, the evidence regarding the ha-has was not available to the previous UDP Inspector.

The Housing Allocation: Other Considerations

- 12.69 The site is well related to the built-up area of the settlement, having recent housing to the south and west, and older development to the north. To the east the Bradford Road, with its busy traffic, separates the site from the fields of the Green Belt. Development on the site would not be conspicuous from the Green Belt. It would be seen against the background of the existing housing.
- 12.70 As for the sustainability of the housing allocation, the land is situated in a settlement which I consider to be a node in a good quality public transport corridor. There are frequent rail services to Leeds and Bradford, together with bus services to those cities. Although the level of employment provided in Burley is low, access is available by public transport to jobs in the urban areas. People might choose to travel by car, and this could be said of many sites, but the opportunity is there for travel by non-car modes. The station is about 700 metres from the centre of the site.
- 12.71 Many services are provided in Burley local centre and elsewhere in the settlement. Although the walking distance to the centre is 700 metres the range of services offered would, in my opinion, help to render the site sustainable for housing development. This range of services, and the obvious high level of community spirit in the settlement, would assist in assimilating the population of a new development into the community. The absence of a secondary school and of a bank are not crucial in view of the availability of public transport. Increases in the number of households in the last 20 or so years will have supported the services in Burley and contributed to a thriving community, in my judgement, rather than harming the community by overloading infrastructure.
- 12.72 Objectors refer particularly to the possibility of problems for the schools if the site were to be built upon. However, the site is allocated for later development and the situation in schools at the time of development would have to be analysed. There is no objection from the LEA.

- 12.73 A safe access could be provided to Bradford Road, and the road has capacity to accommodate the additional traffic which would arise from a housing development. Although part of the appeal of the field to local people as an open space lies in the creatures which visit it, there is not the evidence to show that it is of value to particularly noteworthy species.
- 12.74 As far as flooding risks are concerned, more information has recently become available, information which the previous Inspector did not have. Part of the allocation is at risk of flooding during a 1 in 100 year event. It would be difficult to achieve a sustainable and effective flood mitigation scheme within the site. Flooding problems do not threaten the entire allocation, but would have the effect of limiting the allocation to the southern part of the site only.

The Value of the Land South of Burley House as Recreational/Amenity Land

- 12.75 The whole of this land is green, open land in agricultural and substantial informal recreational use (see 12.79 below). The land is valued by the local community for its appearance and character and for the recreational opportunities it provides. Since the last UDP Inquiry new national policy on open space, sport and recreation has been published (PPG17). The objection land performs most of the open space functions listed in the Annex to the PPG. Although these functions could be continued on the land to the north, national policy warns against the incremental loss of open space.
- 12.76 Existing open space should not be built on unless an assessment has been undertaken which clearly shows the open space to be surplus to requirements. The Council has commenced an assessment for the District as a whole but has not carried out an assessment for this site. Although the Council maintains that this eastern part of Burley has sufficient open space, and that it is the western part of the settlement which is deficient, it cannot show that the land is surplus to requirements. The work done for the last UDP Inquiry, and for the Council's sustainability appraisal, could not, naturally, take account of the new national policy (which does not use NPFA standards). Certainly, the Council has consulted the local community but the housing proposal is the subject of widespread objections.
- 12.77 It seems to me that the objections to the housing allocation on the grounds of the open space value of the land are justified.

Overall Conclusions

- 12.78 I conclude that the housing allocation site is part of the setting of a Grade 1 listed building, and has value as an open space. Allocation as a housing site would harm both functions, and should not be progressed.
- 12.79 With regard to possible open space designations, objection site 1 north of Burley House should be designated as recreational open space. To my mind, there is sufficient evidence of the informal recreational use of the rest of the objection land to justify the same designation for this land too. There is a public right of way alongside the southern ha-ha. Otherwise, access might be only permissive, but I have seen the network of paths across both the southern and northern parts of the site. There is an extensive list of recreational activities which occur on the land, given in one of the Burley Community Council written representations (Inquiry document 3952/6254/4/WR). Although the site is used as grazing land as well, the degree of recreational usage appears to be significant.

Designation as village greenspace is not primarily intended to protect recreational land. As all the land has value both in terms of visual amenity and recreational use, designation under both Policy OS7 and OS2 would be appropriate.

Recommendation

12.80 I recommend that the RDDP be modified as follows:

- [a] Delete housing allocation S/H2.9 (St. Philip's Drive, Burley in Wharfedale) and designate the site as village greenspace (Policy OS7).**
- [b] Designate the objection land north of Burley House, and all of the objection land south of Burley House, including the RDDP housing allocation, as recreation open space under the terms of Policy OS2.**

S/OS7.3 & S/GB1.6: Ellar Gardens, Menston (SOM/S/OS2/47)

Objectors

260/11002/3 *Mrs Lynn Brown*
791/10599 & *Mr & Mrs Worsley*
10601
4447/10867/8 *Mrs Helen E Dinsdale*

Summary of Objections

- Green Belt policy within PPG2 relates to the prevention of unrestricted/unwanted development in the Green Belt.
- This area is the only recreational village greenspace in Menston east of the A65 and must be protected.

Inspector's Reasoning and Conclusions

12.81 The objection land is an open area of mown grass with immature tree planting. It is bisected by an access road with footpaths leading to the modern housing development of Ellar Gardens to its north-western side. Further residential development lies to the south-east, south-west and west. Within the adopted UDP it is designated Green Belt.

12.82 As part of the Council's comprehensive review the site was removed from the Green Belt within the FDDP and RDDP on the basis that it relates more to the built character of Menston than to the Green Belt extending to the north and east. Together with providing a clearly defined boundary this was considered by the Council to amount to an exceptional circumstance justifying the removal of this parcel of land from the Green Belt. Given the configuration of existing residential development, wrapping round almost 3 sides of the land, I accept that the site does not fulfil well the purposes of including land within the Green Belt. There is a firm and well-defined northern edge to the land, which, within the RDDP, now marks the Green Belt boundary. In these circumstances I consider deletion of this land from the Green Belt to be correct.

12.83 Nevertheless, I share the Council's view that the land has an important role to play in providing both an attractive open swathe into the Ellar Gardens housing development and

an amenity function as maintained, informal recreation open space. The Council is therefore proposing that the land be protected by its dual designation as village greenspace and recreation open space. In my view these 2 allocations are likely to ensure the continuing openness and contribution of the land to the character and amenity of this part of Menston. To ensure this dual designation it is necessary to add the recreation open space notation to the Proposals Map since this is absent within the RDDP.

Recommendation

12.84 I recommend that the RDDP be modified by the addition of the recreation open space notation to the Proposals Map in relation to land at Ellar Gardens as shown on page 59 of the Council's proposed changes, dated January 2003.

S/OS7.7: Cleasby Road, Menston

Objector

4255/12171 Ilkley Parish Council

Summary of Objection

- There should be formal identification of this land as that on which development will not be permitted.
- There should be changes to the justifying text.

Inspector's Reasoning and Conclusions

12.85 The objection land is a roughly rectangular open grassed field bounded largely by stone walls in the centre of Menston. The land was unallocated within the FDDP but this was changed to village greenspace within the RDDP. In terms of PPG17 I consider the field performs an important function as an undeveloped open space in contributing to the character and appearance of this part of Menston. It is now correctly protected under the Policy OS7 village greenspace notation. The Council indicates that a Deed of Gift exists which protects the land in perpetuity for the visual enjoyment of Menston residents. The land is protected under this Gift from development and there is no right to cross it or for it to be used as recreation open space. Designation for this latter purpose would therefore be contrary to this Gift.

12.86 Ilkley Parish Council has suggested changes to the wording of the justification to the site's village greenspace notation to prevent misinterpretation of the policy as it applies to the land. The Council has responded to this objection by proposing changes to the text, including deleting mention of overlooking by residential properties and clarifying that the land is to be maintained as an open field. I am satisfied that the suggested amendments make clear the role of the site as village greenspace.

Recommendation

12.87 I recommend that the RDDP be modified by the deletion of the paragraph following Policy S/OS7.7 and its replacement with the paragraph as drafted on page 57 of the Council's proposed changes, dated January 2003.

SOM/S/OS7/49: St Philips Drive, Burley in Wharfedale (S/H2.9)

Objectors

1459/3526	<i>English Heritage</i>
1950/3525	<i>Mrs G H Macintosh</i>
2346/3895	<i>Mr H Hargrave</i>
2764/3930	<i>Mr Peter Rhodes</i>
3405/7856	<i>Mrs Anne Bridge</i>
3408/7858	<i>Mr Alan Bridge</i>
3489/6427	<i>Mrs D M Birkinshaw</i>
4463/9621	<i>Mr & Mrs Peter & Beverley Boyd</i>
4478/8941	<i>Mr G Rogers</i>

Summary of Objections

- The site is used for informal recreation and should be designated as village green space. It forms part of the setting of Burley House.

Inspector's Reasoning and Conclusions

12.88 I have considered this site in relation to S/OS7.1 above, where I conclude that a recreation open space designation would be appropriate.

Recommendation

12.89 **See my recommendation in relation to S/OS7.1 above.**

SOM/S/OS7/304: Parkside School Playing Fields, Cullingworth

Objector

251/8943 *Mr Elvin Brame*

Summary of Objection

- The buildings should be removed from the Green Belt. The playing fields should be allocated under Policy OS7 as village greenspace.

Inspector's Reasoning and Conclusions

12.90 I deal with Green Belt matters below. I do not consider that the land satisfies the RDDP definition of village greenspace. Part of the objection site has been built upon, and most of the remainder consists of the school playing fields, whose function is clearly associated with the school. This is not a public open space. The open parts of the site are also outside the settlement and have a backland relationship with nearby development.

Recommendation

12.91 **I recommend that no modification be made to the RDDP.**

SOM/S/OS7/358: Cleasby Road, Menston

Objector

3954/10558 *Mr B Matlin*

Summary of Objection

- There should be formal identification of this land as that on which development will not be permitted.

Inspector's Reasoning and Conclusions

12.92 I have considered this objection in relation to that made in respect of OS7.7 above, to which reference should be made.

Recommendation

12.93 **See my recommendation in relation to OS7.7.**

Chapter 13 Green Belt

S/GB1.1: Ladderbanks Primary School, Coverdale Way, Baildon

Objectors

932/8972 *Baildon Community Council*
1609/678 *Mrs Hilary Firth*
1913/136 *Mr John Hyde*

Summary of Objections

- Object to any reduction in the Green Belt. Additional school buildings could be permitted in the Green Belt.

Inspector's Reasoning and Conclusions

13.1 The area proposed to be removed from the Green Belt comprises the school building, car park and playing field. Although the school building is quite substantial, the majority of the site is open, and I see no reason to remove the site as a whole from the Green Belt. There could be some basis for removing the developed part of the site from the Green Belt, but this would result in a poorly defined boundary, and there are school buildings in the Green Belt elsewhere in the district, where the Council have not proposed deletions. In my view there are no exceptional circumstances here, which would justify an alteration to the Green Belt boundary.

Recommendation

13.2 **I recommend that the RDDP be modified by the deletion of proposal S/GB1.1 and the retention of land at Ladderbanks Primary School, Coverdale Way, Baildon within the Green Belt.**

S/GB1.2 & S/OS1.9: Area surrounding Baildon Green, Baildon Bank, former Belmont, Salt Grammar and Glenaire Schools

Objectors

These are listed in the appendix to this report.

Summary of Objections

- The area functions as Green Belt and there have been no changes in circumstances to justify its removal from the Green Belt.
- This open countryside would be easier to protect from development if it were kept as Green Belt.
- There is a shortage of recreation open space in Baildon. The land is also important for its wildlife, landscape, and historical value. It forms the backdrop to the Saltaire World Heritage Site.

- Baildon is over-developed.

Inspector's Reasoning and Conclusions

- 13.3 The inner part of the long finger of open land extending into Baildon from the west was identified as urban greenspace in the FDDP but, following the Council's consideration of the above objections, most of it was placed in the Green Belt in the RDDP. However, the Inquiry evidence does not support this action.
- 13.4 The objection land is not part of the belt of open countryside west of Baildon, which continues to the north and then east of the settlement. It is instead a relatively narrow finger of land between 2 parts of the settlement. Most of the land on top of the escarpment which gives rise to the name 'Baildon Bank' is developed. The open area below the escarpment narrows progressively from Baildon Green and ends in a point as it approaches the central part of Baildon. The Inquiry evidence is that the development both north and south of the land forms part of Baildon. The land does not prevent neighbouring towns from merging into one another, as the open countryside further west prevents Bingley from merging with Baildon. Nor, in my opinion, does the objection site safeguard the countryside from encroachment or check the unrestricted sprawl of a large built-up area. The site lies within the large built-up area which constitutes part of the main urban area of Bradford, not within the countryside outside the built-up area.
- 13.5 My conclusion is that the land does not function as Green Belt land. In the context of my general conclusions concerning the Green Belt in the Policy Framework volume of this report, I consider that there are exceptional circumstances for omitting the whole of the objection land from the Green Belt.
- 13.6 There are detailed objections to the absence of a Green Belt designation from the school playing fields of the Sandal and Glenaire Schools, the Thompson Lane allotments, and the recreation ground between Salt and Glenaire Schools. These are all parts of the larger Baildon Bank area, and my conclusions regarding each of them are the same as for the area as a whole. They do not meet the purposes of including land in the Green Belt. As far as Sandal School is concerned there is a further powerful argument for excluding the school site from the Green Belt: the site includes substantial buildings at the frontage, and has housing on 3 sides.
- 13.7 My conclusions are based on the Green Belt merits of the case. The protection of the valuable characteristics of the area can be achieved under the terms of other policies of the RDDP. For example, the landscape importance of the majority of the area would be protected by an allocation as urban greenspace for the appropriate parts of Baildon Bank. Playing fields, allotments, recreation open space, and the World Heritage Site Buffer Zone all have relevant protective policies in the plan. The Inquiry evidence is that Salt Grammar School does not yet have funding for a sports hall, but the question of the suitability of the nearby recreation ground for a sports hall development is one for the Local Planning Authority to deal with should a proposal come forward. Furthermore, my Inquiry is not into disputes concerning village green status or land ownership matters.
- 13.8 The objected areas are only parts of the more extensive tongue of land projecting into Baildon. Bearing in mind that much of the larger area is not the subject of objection, the detailed boundaries of the urban greenspace and of the Green Belt are matters for the Council to consider. For example, the question arises as to how far east the Green Belt area west of Baildon should extend. However, to assist the Council, I give below further

detailed conclusions regarding the objected area around Salt and Glenaire Schools, in case the Council decides to retain in the Green Belt the narrow woodland area to the north.

- 13.9 Salt School contains a number of substantial buildings and a large hard-surfaced parking area, with a housing estate to the south. The school buildings should not be included in the Green Belt, even if the land to the north and west is. The recreation ground and Glenaire School playing fields east of Salt School have a wide northern flank adjoining the woodland. They are also large enough areas of open land to warrant inclusion in the Green Belt if it were to extend across land to the north. The housing at Thompson Green is not within the Green Belt. The Glenaire School buildings are significant in scale and are separated from the housing only by the narrow allotments between. The school buildings should not be included in the Green Belt. The allotments have a short boundary against the woods to the north, and development on 3 sides. In my view they too should be outside the Green Belt.

Recommendation

- 13.10 **I recommend that the RDDP be modified by the deletion of the Green Belt designation from those parts of this objection site which bear that designation, and by the allocation of the majority of the objection site as urban greenspace, the detailed boundaries of which, and of the Green Belt, the Council should decide.**

S/GB1.7 & SOM/S/GB1/387: Meadowside Road, Baildon

Objector

1630/10890 & 10891 Mr Robert Feather

Summary of Objections

- The existing boundary should remain in place, or follow a diagonal line from existing development at the corner of Ladderbanks Lane to the bottom corner of the school grounds.

Inspector's Reasoning and Conclusions

- 13.11 The area proposed to be added to the Green Belt is a small piece of open land adjoining the end of Meadowside Road, and the side gardens to properties fronting onto the road. It is clearly part of the open countryside, and satisfies a number of the purposes of including land within the Green Belt. The present boundary is an anomaly, and I consider that, particularly where a Green Belt review is being undertaken, this is an exceptional circumstance which justifies an amendment to the Green Belt boundary. The alternative boundary suggested by the objector would take in a further area of open land, and follows no natural features. This land is appropriately included in the Green Belt, and I see no justification for removing it, particularly since I am recommending that the Ladderbanks school site remains in the Green Belt.

Recommendation

- 13.12 **I recommend that no modification be made to the RDDP.**

S/GB1.9: Rear Gardens to properties on Nab Wood Drive, Nab Wood

Objector

18/4102 *Christopher Leslie MP*

Summary of Objection

- Doubt the rationale behind the deletion of Green Belt protection for this land, as development would be neither necessary nor desirable.

Inspector's Reasoning and Conclusions

13.13 These areas of land are currently part of the gardens of properties fronting Nab Wood Drive, and have been enclosed by the householders. The Council points out that it is not the intention that the land be developed, but the deletion from the Green Belt is in recognition of its existing use in association with the houses. However, the land remains open, and I do not consider the fact that it has been incorporated into domestic gardens is an exceptional circumstance to justify removing it from the Green Belt.

Recommendation

13.14 **I recommend that the RDDP be modified by the deletion of proposal S/GB1.9 and the retention of land at Nab Wood Drive, Nab Wood within the Green Belt.**

S/GB1.15: Land off Saltaire Road, Eldwick

Objectors

896/1290 *Mrs Dorothy Isaac*
2803/8434 *Bradford Urban Wildlife Group*

Summary of Objections

- This land should remain in the Green Belt.

Inspector's Reasoning and Conclusions

13.15 This land is part of the garden of 5 Pennygate. The Council does not say whether it was included within the curtilage of the dwelling when planning permission was originally granted. Its response, however, suggests that it was not, and the occupiers of the property have incorporated an area of Green Belt land into their curtilage, and removed any boundary between this and the remainder of the garden. In my view, the legitimisation of unauthorised development is not an exceptional circumstance for removing the land from the Green Belt, and the original boundary should be re-instated. The objectors were concerned about the proximity of this land to Shipley Glen, but this is some 300 metres from the site, and I do not consider that a small amendment to the Green Belt boundary in this locality would affect the ecological or wildlife interest of Shipley Glen.

Recommendation

13.16 I recommend that the RDDP be modified by the deletion of proposal S/GB1.15 and the retention of land at Saltaire Road, Eldwick within the Green Belt.

S/GB1.21: Land at Shipley Golf Club, Beckfoot Lane, Cottingley

Objectors

3948/5237 *Mrs L J Littlewood*
3949/5234 *Mr S Littlewood*
3950/8863 *Mr Les Cooper*
3953/8118 *Miss Karen Lambert*

Summary of Objections

- This land should remain in the Green Belt.

Inspector's Reasoning and Conclusions

13.17 At present the Green Belt boundary cuts across the car park, and through part of the clubhouse building. Whilst a golf course and associated buildings are appropriate uses within the Green Belt, the present boundary is illogical, and unrelated to any features on the ground. In view of developments that have taken place, I accept that there are exceptional circumstances for reviewing the boundary in this location to exclude the car park and the whole of the clubhouse building from the Green Belt. However, the boundary proposed would also exclude from the Green Belt a storage building and containers, together with open land beyond, which are ancillary to the use of the land as a golf course. I therefore consider that the Green Belt boundary should coincide with the western edge of the car park.

Recommendation

13.18 I recommend that the RDDP be modified by the amendment of proposal S/GB1.21 to exclude from the Green Belt only the clubhouse and car park, with the retention of the remainder of the proposal land within the Green Belt.

S/GB1.22: Turf Lane, Cullingworth

Objectors

602/5747 *Mr & Mrs Margaret & David Rawnsley*
2220/5784 *Mr & Mrs G Carmichael*
4616/9363 *Chris & Rosemary George*

Summary of Objections

- The land should remain in the Green Belt.

Inspector's Reasoning and Conclusions

13.19 This site was identified as a minor Green Belt deletion in the FDDP, but reinstated in the RDDP. The FDDP proposals have no formal status and, as the proposal has been omitted from the RDDP, I do not conclude upon it.

Recommendation

13.20 **I recommend that no modification be made to the RDDP.**

S/GB1.30: Goose Hall, Wilsden

Objector

2124/1985 *Mr A R Caunt*

Summary of Objection

- Any future development should be restricted to not more than two detached dwellings, in character with the surroundings.

Inspector's Reasoning and Conclusions

13.21 This site adjoins the built-up area of Wilsden, and is currently occupied by a residential property, outbuildings and a paddock. Access is along a track between two properties on Haworth Road, but the present development appears more closely related to the countryside than the village. In my view there are no exceptional circumstances for removing this land from the Green Belt. However, the objection relates only to the form of development that could take place on the site, and this is a matter of detail which should be considered in the context of a planning application. Thus, in view of the lack of any objection in principle to the removal of this land from the Green Belt, I am not recommending any modification to the RDDP.

Recommendation

13.22 **I recommend that no modification be made to the RDDP.**

S/GB1.33: Land between Moor Lane/Bleach Mill Lane, Menston

Objectors

2539/8285 *Mr Brian Jones*
3382/10795 *Menston Community Association*
4255/10609 *Ilkley Parish Council*

Summary of Objections

- The land should remain in the Green Belt.

Inspector's Reasoning and Conclusions

13.23 The area of land proposed for deletion from the Green Belt comprises a residential property, with a small domestic curtilage, and an open paddock. I accept that the dwelling on the Moor Lane frontage appears as part of the built-up area of the settlement, and this part of the site no longer satisfies any of the purposes for including land within the Green Belt. I consider that this is an exceptional circumstance, which justifies removing the dwelling and its immediate curtilage from the Green Belt, but I see no basis for amending the Green Belt boundary to exclude the paddock.

Recommendation

13.24 I recommend that the RDDP be modified by the amendment of proposal S/GB1.33 to relate only to the dwelling and immediate curtilage, with retention of the paddock to the rear of Pantiles, Moor Lane, Menston within the Green Belt.

S/GB1.34: Craven Park, Menston

Objectors

2539/8286 *Mr Brian Jones*
3382/7850 *Menston Community Association*

Summary of Objections

- The land should remain in the Green Belt.

Inspector's Reasoning and Conclusions

13.25 This area of land comprises the rear gardens of some recently constructed dwellings, and the present boundary is close to the rear wall of the properties. The granting of planning permission for these houses in this position clearly envisaged that this land would form their rear gardens, and it is separated from an adjoining paddock by a fence and a row of mature trees. In my view, this is an exceptional circumstance which justifies removing the land from the Green Belt, and the resultant boundary follows a more logical and well-defined boundary than exists at present.

Recommendation

13.26 I recommend that no modification be made to the RDDP.

SOM/S/GB1/1: Sty Lane, Micklethwaite (S/H2.10)

Objectors

These are listed in the appendix to this report.

Summary of Objections

- This land should not be built upon but should instead be added to the Green Belt.

Inspector's Reasoning and Conclusions

13.27 I have considered this site in relation to S/H2.10 above, where I conclude that the housing allocation is appropriate.

Recommendation

13.28 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/2: Hazel Beck, Cottingley (S/H1.17)

Objectors

848/2225	<i>Mr Richard Holmes</i>
1436/2223	<i>Mr J M Hunter</i>
1450/9445	<i>Mrs D W Hunter</i>
1622/2222	<i>Mrs P M Day</i>
1914/2217	<i>Ms J M Wilkinson</i>
2607/11458	<i>Mrs Julia Thomas</i>
3248/8328	<i>Mr Les Thomas</i>
3948/8376	<i>Mrs L J Littlewood</i>
3949/11803	<i>Mr S Littlewood</i>
3950/10817	<i>Mr Les Cooper</i>
3953/8865	<i>Miss Karen Lambert</i>
4019/8866	<i>Mrs Vanessa J Barry</i>
4311/4810	<i>Mrs Pat Rand</i>

Summary of Objections

- Given the undesirability of housing on the site, and the previous Green Belt designation, the land should be included within the Green Belt.

Inspector's Reasoning and Conclusions

13.29 The land is not included in the Green Belt as depicted in the approved UDP. The Council's evidence is that the site was not in the Airedale Local Plan Green Belt either. I conclude above against a housing allocation, but I do not have sufficient evidence concerning the reasons why the site was originally excluded from the Green Belt to conclude that the site should be added to the Green Belt now.

Recommendation

13.30 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/46: Crow Nest/Jer Wood, Bingley (S/H2.6)

Objectors

4418/9049	<i>Mr D T Maude</i>
2803/12520	<i>Bradford Urban Wildlife Group</i>

Summary of Objections

- The housing allocation should be deleted and the land designated as Green Belt.

Inspector's Reasoning and Conclusions

13.31 I have considered this matter in relation to S/H2.6 above where I note that the housing allocation has been deleted in the RDDP. As the site is within the urban area Green Belt designation would not be appropriate, and I conclude that the land should be allocated as recreation open space under Policy OS2.

Recommendation

13.32 **I recommend that the RDDP be modified by the allocation of the site as recreation open space under Policy OS2.**

SOM/S/GB1/171: Warren Lane, Eldwick (S/H1.10)

Objectors

2803/8927 *Bradford Urban Wildlife Group*
3180/3856 *Mr C Starkey*

Summary of Objections

- The housing allocation on the site should be deleted and the land designated as Green Belt.

Inspector's Reasoning and Conclusions

13.33 I have considered this matter in relation to S/H1.10 above, where I note that planning permission has been granted for residential development of the site. In these circumstances it is not appropriate to change the RDDP allocation.

Recommendation

13.34 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/179: Hirstwood Nursery, Hirst Mill Crescent, Saltaire

Objector

2676/6860 *Hartley Property Trust Ltd*

Summary of Objection

- The land should be removed from the Green Belt.

Inspector's Reasoning and Conclusions

13.35 The objection site lies between the River Aire and the Leeds-Liverpool Canal, and comprises a garden centre, an area used for caravan storage and vacant land. To the west is a small group of dwellings but these, together with open land and water on the other sides of the site, are included within the Green Belt. The objector suggests that the site is in need of investment but that is not an exceptional circumstance for removing land from the Green Belt, and I see no reason why the site should not continue to operate as a garden centre.

Recommendation

13.36 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/181: Rose Garden, Victoria Road, Saltaire

Objector

2676/6864 *Hartley Property Trust Ltd*

Summary of Objection

- The site serves no Green Belt purpose or function and should be excluded from that designation.

Inspector's Reasoning and Conclusions

13.37 The site forms a strip of land between the River Aire and the Leeds-Liverpool Canal immediately to the north of the settlement of Saltaire. Previously laid out as rose gardens it is now overgrown and contains a number of mature trees that I understand are included within a Tree Preservation Order. To the north, beyond the river, is Roberts Park, to the east the grounds of a public house, and to the south a roadway leading to the sports and recreational facilities that lie to the west. The current Green Belt boundary encompasses the park, follows the line of the path and bridge across the river, runs along the canal, and then follows the curtilage boundary of the Saltaire United Reformed Church to the railway.

13.38 This part of the Green Belt forms a wedge that separates the built development of Saltaire from the housing areas to the north, and comprises a fairly narrow section in this locality. I accept that the objection site forms a small part of this area, and that the river would comprise a defensible boundary along the northern edge of the site. However, I consider that the canal and the footpath to the bridge represent a very distinct edge to the built area of Saltaire. Any further built development beyond this line would harm the character and appearance of the area, and create an unnecessary and harmful encroachment into the open land separating the built-up areas to the north and south.

13.39 Thus, I conclude that the site forms an important part of the Green Belt and has a specific function in separating settlements, preventing encroachment into open landscapes and protecting the setting of the historic area of the World Heritage Site. In addition, the western boundary of the site is not a distinctive feature and would not provide the clear, defensible boundary required for the Green Belt. Accordingly, I consider that the site is

appropriately included within the Green Belt and there are no exceptional circumstances sufficient to warrant its exclusion.

13.40 I note that the objector has indicated that the land should be allocated for housing under Policy H1 of the RDDP, but that this has not been accepted by the Council as a duly made objection. Nevertheless, the Council has made some response to this suggestion. As I have already indicated, I consider that built development here would result in significant harm to the character and appearance of the area, and this would be contrary to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and advice in PPG15. I accept that the site is close to local services and facilities, as recommended in PPG3, and is a sustainable location. However, the proposal would represent inappropriate development in the Green Belt and is thus unacceptable, in addition to the other harm that I have indicated.

13.41 An objection has also been lodged relating to the washlands allocation affecting this site. This matter is considered under reference SOM/S/NR16/181/1 below.

Recommendation

13.42 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/185 & SOM/S/H1/185: Land at Heatherlands Avenue, Denholme

Objector

4183/8467/8

Norian Properties Ltd

Summary of Objections

- This land is suitable for residential use.

Inspector's Reasoning and Conclusions

13.43 This open land prevents the westward spread of the Ogden Lane development in Denholme. It also safeguards the countryside north-west of Denholme from encroachment from further house building. I do not agree with the Council's view that the site helps to separate Denholme from the developed area around Beech Drive, because the latter area is north of Denholme, not to its west. Nevertheless, the objection land does function as Green Belt, and should not be deleted from it. The Green Belt already has a satisfactory boundary where the built-up area of Denholme finishes and the open land of the objection site begins. Nor is Denholme a high priority settlement for the allocation of land for housing. My opinion is that the objection site should not be so allocated. It would not be right to allocate the site for housing and at the same time keep it in the Green Belt. Even low density, landscaped development is inappropriate development in the Green Belt, and would reduce the openness of the Green Belt.

Recommendation

13.44 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/188: Land at Sun Lane, Burley in Wharfedale

Objector

4173/8454 Exors J Lister

Summary of Objection

- The land should be removed from the Green Belt.

Inspector's Reasoning and Conclusions

13.45 The objection site comprises pastureland, partly enclosed by hedgerows and fences, on the north-western edge of Burley in Wharfedale. Burley has had considerable new development in recent years, and there are only limited proposals for additional development in the RDDP. There are strong physical features restricting the spread of the settlement in the form of the railway, the bypass, and Bradford Road but, in this area, the Green Belt boundary is defined only by the limit of development. However, it is a clearly defined boundary, and these fields are pleasant open countryside, and are an important part of the Green Belt separating Burley and Ilkley.

13.46 The location strategy for housing requires that sites within the urban areas are the first choice, followed by sites on the edge of the urban areas, and only after that would sites in well located settlements such as Burley be considered. Similar considerations apply to safeguarded land. There will be a need for land to be removed from the Green Belt to provide for development beyond the plan period, but this site should not be taken out of the Green Belt. I conclude that there are not exceptional circumstances to justify the release of this site from the Green Belt.

Recommendation

13.47 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/189, SOM/S/UR5/189 & SOM/S/H2/189: Land at West Lane, Baildon

Objector

1729/8417/18 Maurice Wright 1998 and Margaret Wright 1999 Trust
& 8424

Summary of Objections

- The land should be deleted from the Green Belt and allocated for housing under Policy H2, or as safeguarded land.

Inspector's Reasoning and Conclusions

13.48 The land lies to the north of West Lane, which forms the boundary of the Green Belt in this location, between a former reservoir site (allocated in the RDDP for housing under Policy H2) and existing housing to the west. It includes the properties at Oakleigh House and Barn and Oakleigh Lodge in the eastern section of the site. A small area in the south-

western corner of the land, occupied by an electricity sub-station, has been deleted from the Green Belt in the RDDP.

13.49 I note that the land was originally allocated as Protected Open Land in the deposit draft of the now adopted UDP, and that my colleague Inspector expressed the view that the site did not seem to be essential to the Green Belt in the long term. I also note that the Council's Green Belt review concluded that release of part of the site would not prejudice the purposes of the Green Belt.

13.50 However, West Lane forms a distinct and strong boundary to the Green Belt, whilst the objection site has only a post and rail fence along part of its northern boundary. Whilst there is a change in ground levels near to the northern boundary this is not particularly pronounced, and does not form a significant physical feature that could constitute a defensible boundary to the Green Belt. Furthermore, development of this land would constitute urban sprawl in the open countryside. Hence, I consider that the land forms an important part of the Green Belt in this location, and development would conflict with the functions and purposes of the Green Belt. The site is very different from the reservoir land to the east, which is partly previously-developed land and therefore falls within the urban area.

13.51 In addition, the land is not in a particularly sustainable location, being somewhat distant from the local services and facilities in Baildon, and not being well served by public transport. In this respect the site performs worse than the reservoir land to the east. Therefore, even if further land were needed to cater for the housing requirements within or beyond the plan period, this site would not rank highly in terms of the locational strategy sequence of the RDDP.

13.52 Accordingly, I conclude that the land is properly designated within the Green Belt and allocation for housing under Policy H2, or as safeguarded land, would be inappropriate.

Recommendation

13.53 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/189.01, SOM/S/UR5/189.01 & SOM/S/H2/189.01: Land at Oakleigh, West Lane, Baildon

Objector

*1729/8414, Maurice Wright 1998 and Margaret Wright 1999 Trust
8422 & 8425*

Summary of Objections

- The land should be deleted from the Green Belt and allocated for housing under Policy H2, or as safeguarded land.

Inspector's Reasoning and Conclusions

13.54 This objection site forms the eastern section of the site considered above (SOM/S/GB1/189), wrapping around the existing development at Oakleigh House and

Barn. The proposed western boundary is formed by a broken line of trees along the line of a small watercourse.

13.55 As with the larger site I consider that the proposed boundaries are less defensible than West Lane, development would conflict with the functions and purposes of the Green Belt, and the location is not particularly sustainable in terms of proximity to local services and facilities, including public transport.

13.56 Accordingly, I consider that inclusion within the Green Belt is appropriate and allocation for housing or as safeguarded land would be unacceptable.

Recommendation

13.57 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/190 & SOM/S/H1/190: Land off Haworth Road/Bob Lane, Wilsden

Objector

4013/8451 & *Southdale Homes Limited*
8453

Summary of Objections

- The site should be allocated for housing/affordable housing.

Inspector's Reasoning and Conclusions

13.58 This land is part of the adopted Green Belt and of the open countryside outside Wilsden. On 3 sides there is further open land also forming part of the Green Belt and open countryside. All of this open area prevents the settlement from sprawling southwards into the countryside and extending towards Thornton. The objection site performs as Green Belt. Although there is a need to review the Green Belt in the district generally, Wilsden is not a settlement which has a priority for the allocation of housing land. There are therefore no exceptional circumstances for removing the site from the Green Belt. Hence, housing allocation would be inappropriate. No evidence is provided of the need for affordable housing. The development plan policies referred to by the objector are those of the adopted UDP, which the RDDP is intended to replace.

Recommendation

13.59 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/191 & SOM/S/H1/191: Land off Micklethwaite Lane, Micklethwaite

Objector

4262/8475 & *Mr Keith Downs*
8478

Summary of Objections

- The land should be deleted from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

13.60 The site comprises land to the north-east and east of existing residential development at Greenhill Drive, on the edge of the small settlement of Micklethwaite, which is included within the designated Green Belt. The northern section of the site is part of the Micklethwaite Conservation Area. Policy GB3 of the RDDP refers to infilling within the defined areas of settlements included within the Green Belt. Only a very small section of the site, already occupied by a dwelling, is within the scheduled infill area.

13.61 My conclusions on meeting the housing requirement are given in the Policy Framework volume of my report. The site is greenfield, detached from the urban area and on the edge of a less well located settlement with very limited local services and facilities, including public transport. In terms of national, regional and local policy guidance in relation to locational strategy, the site comes very low in the sequential order. In addition, no evidence of local need has been provided and the suggested housing density is not representative of that usually associated with affordable housing (as well as being contrary to the advice in PPG3).

13.62 The facts that the site adjoins existing development and could be accessed from an existing roadway do not constitute site-specific exceptional circumstances that warrant removing the land from the Green Belt. Whilst the proposed development would be partly screened from view by the existing housing this does not justify the encroachment into open countryside that forms an important part of the separation of built-up areas.

13.63 I consider that the allocation of the site for housing would be contrary to the functions and purposes of the Green Belt. Furthermore, it would fail to comply with national, regional and local policy guidance on the location of development, and would be contrary to the advice in PPG3 in relation to sustainable development.

Recommendation

13.64 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/191.01, SOM/S/H1/191.01 & SOM/S/H2/191.01: Land off Micklethwaite Lane, Micklethwaite (opposite Thornfield Mews)

Objector

4013/8446, *Southdale Homes Limited*
8448/9

Summary of Objections

- The land should be deleted from the Green Belt and allocated for housing.

Inspector's Reasoning and Conclusions

13.65 The site comprises the northern section of the land included in objection SOM/S/GB1/191 considered above. My conclusions on that objection are relevant. In addition, the whole of this site is within the conservation area, and I consider that the open views in this part of the settlement are essential features of the character and appearance of the area. Thus, development of this land would fail to preserve or enhance the character or appearance of the area, as specified in the Planning (Listed Buildings and Conservation Areas) Act 1990 and PPG15.

Recommendation

13.66 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/301: Bingley Road, Menston

Objectors

4593/9775 *Mr J K Smith*
4594/9777 *Mr Young*

Summary of Objections

- More housing allocations are needed and the objection site would provide a sustainable site. It does not function as Green Belt.

Inspector's Reasoning and Conclusions

13.67 I have considered this site in relation to SOM/S/H1/301 above, where I conclude that most of the land should be removed from the Green Belt.

Recommendation

13.68 **See my recommendation in relation to SOM/S/H1/301 above.**

SOM/S/GB1/301.01: Bingley Road, Menston

Objectors

4593/9776 *Mr J K Smith*
4594/9780 *Mr Young*

Summary of Objections

- More housing allocations are needed and the objection site would provide a sustainable site. It does not function as Green Belt.

Inspector's Reasoning and Conclusions

13.69 I have considered this site in relation to SOM/S/H1/301 above, where I conclude that most of the land should be removed from the Green Belt.

Recommendation

13.70 **See my recommendation in relation to SOM/S/H1/301 above.**

SOM/S/GB1/303: Land adjacent to Parkside School, Cullingworth

Objector

4233/8953 *Mrs Margaret Perris*

Summary of Objection

- The land should be deleted from the Green Belt and allocated in part for housing and part for school playing fields.

Inspector's Reasoning and Conclusions

13.71 I have considered this objection in relation to SOM/S/H1/303.01 and SOM/S/CF3/303.02 above, where I conclude that the Green Belt designation should be retained.

Recommendation

13.72 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/304: Parkside School Playing Fields, Cullingworth

Objector

1439/9434 *Parkside School*

Summary of Objection

- The whole of the school grounds should be deleted from the Green Belt.

Inspector's Reasoning and Conclusions

13.73 The school buildings are already excluded from the Green Belt in the RDDP. The playing fields are an appropriate use within the Green Belt. At the Inquiry session in relation to the proposals for an additional school site (reported under S/E1.12 and S/E1.13 above) the Council indicated that, should additional school buildings be required, they might be accommodated on the existing site. Any displaced playing fields could then be provided elsewhere in the Green Belt. I do not consider that this represents sufficient exceptional circumstances for removing the playing fields from the Green Belt, not least because the Local Education Authority has no current plans for additional school buildings.

13.74 I note that the playing fields notation (Policy OS3) overlaps with the school buildings. The Council will wish to consider whether this is anomalous.

Recommendation

13.75 I recommend that no modification be made to the RDDP.

SOM/S/GB1/388: Paddock adjacent to Orchard, Sheriff Lane, Eldwick

Objector

2921/10888 *Mr Ian Beck*

Summary of Objection

- The land should be removed from the Green Belt.

Inspector's Reasoning and Conclusions

13.76 The objection site is an open field immediately beyond the built-up area, with access from an unmade road. Whilst there are residential properties on both sides of the site, that to the south appears as an isolated dwelling in the countryside, and the gardens of the properties to the north provide a clearly defined boundary to the Green Belt. Once the extent of the Green Belt has been approved it should be altered only in exceptional circumstances, and I do not consider that there are any exceptional circumstances for removing this land from the Green Belt.

Recommendation

13.77 I recommend that no modification be made to the RDDP.

SOM/S/GB1/392 & SOM/S/H1/392: New Brighton, Cottingley

Objector

2575/11070/71 *Mr R Bell*

Summary of Objections

- Land at the southern end of New Brighton should be omitted from the Green Belt so that housing can be built there, together with a turning head to help vehicles using this narrow cul de sac.

Inspector's Reasoning and Conclusions

13.78 New Brighton basically consists of a cul de sac of houses extending southwards from Cottingley Cliffe Road. New Brighton is located in open countryside between Cottingley to the west and Nab Wood, Shipley, to the east. This area of countryside is also important in separating Shipley from the western suburbs of Bradford to the south-west. Although the objector estimates there to be about 48 houses in New Brighton it is in my opinion too

small to warrant exclusion from the Green Belt. The Green Belt surrounds the cul de sac and performs the important purposes of preventing neighbouring towns from merging, and of safeguarding the countryside from encroachment. In addition, the Green Belt here checks the unrestricted sprawl of large built-up areas.

- 13.79 The objection site is mostly open land positioned at the end of the cul de sac. It therefore shares the Green Belt functions of the other open land in the locality. The exclusion from the Green Belt of this site would result in a consolidation of development in the middle of the Green Belt, harming the purposes of including land in the Green Belt. The harm would be well seen from the public footpath alongside the site.
- 13.80 In terms of the priorities for allocating land for housing, set out in regional guidance, the objection site is not a high priority site. New Brighton is not part of any urban area or town. There are facilities in Cottingley, down the hill to the north-west, but New Brighton itself does not have any local facilities or services, other than a bus service. To my mind the site is not so well placed that its sustainability advantages should lead to an amendment to the Green Belt in favour of the objection.
- 13.81 If all of the site is regarded as part of the curtilage of a house, the site is previously-developed land, but so is much open land associated with houses in the Green Belt, and development on the objection site would have the harmful effects I have mentioned. The provision of a turning head for general traffic would be useful but is of little weight in the context of Green Belt boundary changes.
- 13.82 My conclusion is that there is insufficient justification for removing the site from the Green Belt.

Recommendation

- 13.83 **I recommend that no modification be made to the RDDP.**

SOM/S/GB1/395 & SOM/S/GB3/395: West of Moor Road, Burley Woodhead

Objector

1777/11063 & 11062 Trustees of the Bingley & Burley Moors Estate

Summary of Objections

- Burley Woodhead should be identified as an infill settlement within the Green Belt, where Policy GB3 would apply, and the boundary should include the objection site.

Inspector's Reasoning and Conclusions

- 13.84 Burley Woodhead comprises a public house and a small group of adjoining dwellings, with more scattered development beyond. In my view it is not a settlement but sporadic development in the countryside, and hence it would not be appropriate to include it in the list of settlements covered by Policy GB3. In addition, an "infill" site is defined in the RDDP as a small gap in a small group of buildings, whereas the objection site is a substantial gap between two small groups of buildings, and thus development here would not be infill.

Recommendation

13.85 I recommend that no modification be made to the RDDP.

SOM/S/GB3/392: New Brighton, Cottingley

Objector

2575/11072 Mr R Bell

Summary of Objection

- New Brighton should be listed as a settlement where infill development is permitted. Land at the southern end of the settlement could be developed with advantage. (See also SOM/S/GB1/392).

Inspector's Reasoning and Conclusions

13.86 National policy in PPG2 allows for situations where infilling or other development is to be allowed in existing villages. The objector agrees that New Brighton is not a village. Nor is it a major developed site in the Green Belt. The majority of settlements which the RDDP lists in Policy GB3 are traditional villages and hamlets. Many have services and/or employment. In contrast, New Brighton is, as described in relation to SOM/S/GB1/392 above, a cul de sac of houses, and lacks other land uses. Its character is very different from the characters of the listed settlements.

13.87 New Brighton is situated at a sensitive location in the Green Belt. The purposes of the Green Belt in this area are outlined above. I consider that it would harm these purposes if the cul de sac were to be subject to infill policies allowing the consolidation of development which the objector has in mind. The number of houses at New Brighton does not outweigh the factors which lead me to conclude against the objection.

Recommendation

13.88 I recommend that no modification be made to the RDDP.

SOM/S/GB3/397, SOM/S/GB3/398 & SOM/S/GB3/399: Moor Lane, Bingley Road & Derry Hill, Menston

Objector

2600/11115-17 Mr Graham Dearden

Summary of Objections

- Infill development should be allowed on Moor Lane, Bingley Road and Derry Hill.

Inspector's Reasoning and Conclusions

13.89 Policy GB3 relates to settlements washed over by the Green Belt, wherein infill development will be permitted, subject to specified criteria. The three areas referred to by the objector are outside the built-up area of Menston, which is not one of these settlements but one of the larger rural settlements of the district which is outside, but surrounded by, the Green Belt. There is no policy relating to infill development outside of settlements, and such development would not accord with the advice in PPG2. In addition, an "infill" site is defined in the RDDP as a small gap in a small group of buildings, whereas the objection sites are quite substantial gaps within scattered groups of buildings, and thus development here would not be infill. However, by virtue of my recommendation regarding site SOM/S/H1/301 above, site SOM/S/GB3/398 would be omitted from the Green Belt.

Recommendation

13.90 **I recommend that no modification be made to the RDDP other than that made in relation to SOM/S/H1/301.**

SOM/S/GB6A/400 & SOM/S/GB7/400: Graincliffe Reservoir & Water Treatment Works

Objectors

4365/12816 *Yorkshire Water Services Ltd*
4174/11118 *Keyland Developments Ltd*

Summary of Objections

- This should be identified as a Major Developed Site.

Inspector's Reasoning and Conclusions

13.91 Although the overall size of this site exceeds the 5-hectare guideline adopted by the Council, the developed area is only about half of that size. Whilst it contains some large buildings which are prominent in the landscape, I do not consider that the extent of the buildings is sufficient to justify identification as a Major Developed Site.

Recommendation

13.92 **I recommend that no modification be made to the RDDP.**

SOM/S/GB6A/407 & SOM/S/GB7/407: Dowley Gap Waste Water Treatment Works

Objectors

4365/12815 *Yorkshire Water Services Ltd*
4174/11125 *Keyland Developments Ltd*

Summary of Objections

- This should be identified as a Major Developed Site.

Inspector's Reasoning and Conclusions

13.93 This site has an overall area in excess of 5 hectares, although the Council assesses the developed area as being just over 4 hectares. However, although the site area is quite large, it does not contain any significant structures, and there is little potential for infilling. In these circumstances, I consider that it would be inappropriate to identify it as a Major Developed Site.

Recommendation

13.94 **I recommend that no modification be made to the RDDP.**

POL/S/GB7: Major Developed Site in the Green Belt

Objectors

3873/12506 *Ms Jean Hunter*
3952/12534 *Burley Community Council*

Summary of Objections

- Scalebor Park Hospital should be identified as a Major Developed Site in the Green Belt.

Inspector's Reasoning and Conclusions

13.95 In the FDDP Scalebor Park Hospital was identified as a Major Developed Site in the Green Belt, although there was no policy relating to such sites. The RDDP introduced Policy GB6A, which identified Major Developed Sites, and set out criteria for development within them. The reference to Scalebor Park Hospital was deleted from both the Policy Framework and the Shipley constituency proposals volumes.

13.96 Planning permission was granted in 2001 for conversion of some of the existing buildings and erection of 145 new dwellings, and there have been a number of subsequent amendments. The development is now largely completed, leaving only one part of the site still in hospital use. I understand that this is likely to become redundant at some time in the future. The objectors are concerned that this should be treated sensitively and within the same parameters as the rest of the site, and that the requirements imposed on the original planning permission are carried through.

13.97 The residential redevelopment of the site is at such an advanced stage that it would be inappropriate to describe it as a Major Developed Site, to which Policy GB6A would apply, and the remaining hospital buildings are not of such a scale as to justify this designation. However, the site would remain in the Green Belt, and any proposals would have to show that there were very special circumstances for allowing the development. In my view this would provide sufficient control to ensure that no inappropriate development would take place.

Recommendation

13.98 I recommend that no modification be made to the RDDP.

Chapter 14 Natural Environment and Countryside

S/NE8.1: Bingley South Bog

Objector

2485/2129 *Professor R J Butler*

Summary of Objection

- There is no statement as to how this SSSI will be managed following the construction of the Bingley Relief Road.

Inspector's Reasoning and Conclusions

14.1 As a result of the objection, made to the FDDP, the RDDP includes a statement explaining that the SSSI will be managed by the Council for conservation and environmental education. I saw on my site visit that the new road has been carried across the site on piers, and that associated work appears to have been kept to the edges of the area, in order no doubt to minimise impacts on the scientific value of the land and water areas. Management as the Council proposes would seem appropriate.

Recommendation

14.2 **I recommend that no modification be made to the RDDP.**

SOM/S/NE9/46: Crow Nest/Jer Wood, Bingley (S/H2.6)

Objector

4399/9614 *Mrs S Hoyle*

Summary of Objection

- The site should not be developed in view of its nature conservation interest.

Inspector's Reasoning and Conclusions

14.3 I have considered this matter in relation to S/H2.6 above, where I note that the housing allocation has been deleted from the RDDP. I conclude that the land should be allocated as recreation open space under Policy OS2.

Recommendation

14.4 **I recommend that the RDDP be modified by the allocation of the site as recreation open space under Policy OS2.**

SOM/S/NE9/125: Clarendon Road, Gilstead (S/H1.12)

Objector

2803/9699 *Bradford Urban Wildlife Group*

Summary of Objection

- The site should not be developed in view of its nature conservation significance.

Inspector's Reasoning and Conclusions

14.5 I have considered this matter in relation to S/H1.12 above, where I note that planning permission has been granted for residential development of the site. Accordingly, such development can take place and, therefore, the RDDP allocation should be retained.

Recommendation

14.6 **I recommend that no modification be made to the RDDP.**

SOM/S/NE9/206 & SOM/S/OS2/206: Red Beck Mill Pond, Wharnccliffe Road/Norwood Avenue, Shipley

Objectors

532/8252	<i>Mr Walter Metcalfe</i>
1991/8273	<i>Mr & Mrs G Kalman</i>
2121/8275	<i>Mrs E Holmes</i>
2888/8292	<i>Mr and Mrs P H Buckley</i>
2897/8293	<i>Mrs Betty Topham</i>
2927/9705 & 9581	<i>Miss Carol Sadwyj</i>
3039/8270	<i>Mr Shaun Radcliffe</i>
3055/8945	<i>Mr and Mrs M Holleran</i>
3934/8362	<i>Mrs Sheila Metcalfe</i>
4001/8382	<i>Mrs Patricia Crook</i>
4246/8389	<i>Mrs Maureen Brotherton</i>
4248/8390	<i>Redbeck Mill Pond Conservation Group</i>
4249/8391	<i>Ms Julie Poppleton</i>
4256/8392	<i>Mr and Mrs Kilvington</i>
4285/8402	<i>Mr G Fox</i>
4643/9801	<i>Mr Amjad Mahmood</i>
4644/9802	<i>Mr Majid Ali</i>
4646/9803	<i>Arnold, Linda & Debbie Marriott</i>

Summary of Objections

- The site is of nature conservation interest. It should be protected from further damage and designated as a wildlife reserve.

Inspector's Reasoning and Conclusions

- 14.7 The Council agrees that the pond will have recovered its nature conservation value, having filled with water again following the cessation of drainage and other operations commenced in 2001. In the view of both the Council and objectors the site has substantive nature conservation value. The objectors point out that proper surveys have not been possible in the absence of access to the site. Nevertheless, the variety of species visiting the site, and feeding/foraging there, is sufficient to confirm the value of the pond. The bats which have been recorded are in my opinion likely to be resident. Kingfishers, goosanders, grey wagtails, tufted duck and goldeneye, amongst other creatures, are likely to be visitors. The assemblage of species, together with the availability of water and trees, give the site value in the urban context in which it is located. There is no doubting the importance the local community attaches to the site. There is also a wildlife corridor function as Heaton Woods are not far to the west of the site, and downstream the beck discharges into Bradford Beck, which flows through a partially open valley.
- 14.8 I conclude that the site has substantive nature conservation value. This gives the site value equivalent to that of the Bradford Wildlife Areas.
- 14.9 If this objection site is to be shown on the Proposals Map, by extension the designated Bradford Wildlife Areas should also be shown. The Council has decided not to show Bradford Wildlife Areas on the Proposals Map. This is because some areas are too small to show clearly and others so large that to show them would, in the Council's view, render the maps difficult to read.
- 14.10 As a matter of principle areas subject to area-based policies should be shown on the Proposals Map. For one thing this enables all users of the plan to see precisely where particular policies apply. Having seen the totality of Bradford Wildlife Areas on plan in a published document (Inquiry Core Document CD143) I consider that it should not be too difficult to show the Bradford Wildlife Areas, in the light of the overriding need to show areas covered by policies of this type. The smaller sites would not be shown in any case, because the usual minimum size cut-off point of 0.4 hectares would apply.
- 14.11 Other matters raised by objectors, regarding actions taken by the owner of the site, are not matters for me.

Recommendation

- 14.12 **I recommend that the RDDP be modified by showing Red Beck Mill Pond and Bradford Wildlife Areas on the Proposals Map, as being subject to Policy NE9.**

Chapter 15 Natural Resources

SOM/S/NR3/396: Bolton Woods Quarry

Objector

4122/11082

Brighthouse Estates Ltd

Summary of Objection

- The operational area of the quarry should be identified in the plan, because of its importance to the local economy and the need to exploit mineral reserves.

Inspector's Reasoning and Conclusions

- 15.1 I recommend in paragraph 15.12 of the Policy Framework volume of this report that existing quarries should be shown on the Proposals Map. This would give greater certainty to users of the UDP. In the case of Bolton Woods Quarry there are further reasons why the site should be specifically allocated. The quarry has permission to work several minerals, some of which are of high quality. Very little waste results from the quarrying because so much of the material won is useful. Additionally, the aggregate minerals, in particular, are used locally. The operation is very sustainable.
- 15.2 The minerals are important economically. The quarry and associated businesses provide work and have a multiplier effect on the local economy.
- 15.3 The Council does not dispute the above arguments concerning the importance of the quarry. Nor does it address the objector's argument that there is a need to extend the quarry during the plan period. The final written representation from the objector in fact requests the identification of the proposed extension area as a preferred area for minerals extraction. This should be a matter for the Bradford North constituency volume, within which the extension area lies, but the Council has not registered the objection under Bradford North. Consequently I deal with the matter here.
- 15.4 The Council has not identified preferred areas or specific sites for extraction, because of an alleged absence of information from quarry operators. However, this objector has provided sufficient evidence of the public benefits of extending the quarry, and of the need to extend during the plan period, to justify making an exception in this instance. I note that a buffer zone is allocated in the RDDP to protect dwellings which are located near the extension area. Any planning application to extend the quarry would have to include measures to protect the amenities of nearby residents.
- 15.5 As this is a proposal to extend a quarry, Policy NR3 is appropriate, but the extension area should be safeguarded too, because of the need to protect the mineral resources until extraction. I do not include the various permitted areas at the quarry for identification under Policy NR3, because they are the subject of planning permissions, some have been worked out, and others are being worked at the moment. The justification for the inclusion of the quarry extension proposal in the plan could draw on the material above and on the objector's representations as necessary.

- 15.6 It may appear anomalous to identify only one specific site under Policy NR3, but there is only one site for which I have sufficient evidence. It is a site of importance, and its identification would help to make the plan more useful, helpful and clear in its provisions. Amongst other things, allocation would give certainty to the operator and those parties dependent upon the future of the quarry.
- 15.7 My recommendation regarding identification under the terms of Policy NR1 is more detailed than the general recommendation I make in the Policy Framework volume, because this is a site-specific objection.

Recommendation

15.8 **I recommend that the RDDP be modified as follows:**

- [a] **Insert in the Bradford North constituency volume a section entitled “Policy NR3” and list under that heading “Bolton Woods Quarry Extension”, followed by a reasoned justification of the identification of the quarry extension.**
- [b] **Identify on the Proposals Map the field in the south-eastern corner of the objection site, with the Legend “Policy NR3 Bolton Woods Quarry Extension”.**
- [c] **Identify Bolton Woods Quarry, as defined in the objection of Brighouse Estates Ltd, as an existing mineral extraction site, on the Proposals Map, with a reference to Policy NR1 in the Legend to the map.**

POL/S/NR4: Bolton Woods Quarry Buffer Zone

Objector

4122/10789

Brighouse Estates Ltd

Summary of Objection

- Objection is made to the reference to the site’s inclusion in the Poplars Farm urban greenspace.

Inspector’s Reasoning and Conclusions

15.9 I have concluded above (see under Policy OS1.11) that the eastern part of the Poplars Farm urban greenspace should be deleted from the urban greenspace. This would leave part of the buffer zone in the urban greenspace and part outside it. The reference to the urban greenspace under Policy S/NR4 should be amended accordingly.

Recommendation

15.10 **I recommend that the RDDP be modified by the replacement, in the final sentence of the reasoned justification to Policy S/NR4, of “All of the zone” by “Part of the zone”.**

SOM/S/NR16/181: Rose Garden, Victoria Road, Saltaire

Objector

2676/6869 *Hartley Property Trust Ltd*

Summary of Objection

- The land has not been subject to flooding and the washlands designation should be deleted.

Inspector's Reasoning and Conclusions

15.11 The land is located between the River Aire and the Leeds-Liverpool Canal and comprises an unkempt area formerly laid out as rose gardens. The north-western section of the site is shown on the RDDP Proposals Map as being within the washlands of the river. The whole of the site is shown on the 2002 Interim Floodplain Map (IFM) prepared by the Environment Agency in accordance with PPG25.

15.12 In general terms the washlands area equates to the functional floodplain of the river (high-risk zone 3c) of PPG25), where built development should be wholly exceptional, whilst the remainder of the site would come within high-risk zones 3a) and/or 3b). However, the plan recognises that there may be some variation between the washlands and functional floodplain in some locations. The Environment Agency is currently undertaking work to bring greater precision to the extent of the floodplain. National policy advice in PPG25 emphasises the need for a precautionary approach to the allocation and development of land that may be subject to flooding, or which could result in flooding upstream or downstream of the particular site.

15.13 Therefore, at this time I am satisfied that it is appropriate for the north-western section of the site to be designated as washlands. If the current work of the Environment Agency should result in a change in the area of the designated floodplain the IFM will be revised accordingly. Any subsequent alteration to the extent of the washlands and functional floodplain would need to be taken into account in a future review of the UDP and as a material consideration in the determination of any application for planning permission.

15.14 I note that the objector has indicated that the site should be allocated for housing under Policy H1 of the RDDP. The Council does not accept that this constitutes a duly made objection, but has made comment on it. I have considered this matter under SOM/S/GB1/181/1 above, where I conclude that housing development here would be inappropriate. Such development would also be contrary to the advice in PPG25.

Recommendation

15.15 I recommend that no modification be made to the RDDP.

Chapter 16 Pollution, Hazards and Waste

SOM/S/P15/396: Bolton Woods Quarry

Objector

4122/11081

Brighouse Estates Ltd

Summary of Objection

- The quarry should be identified for use as a waste disposal site following the cessation of extraction on part of the site.

Inspector's Reasoning and Conclusions

- 16.1 Some tipping takes place at the quarry now, although the Council refers to it as modest. It is permitted development, but Policy P15 envisages the granting of planning permission for landfill, and the objection does not restrict the filling to less than the whole quarry.
- 16.2 The extraction of minerals is permitted at the quarry until 2042, and the operative restoration and after-use condition on the permissions does not require a scheme to be submitted until after the end of the plan period. The objector wishes to continue to extract minerals beyond the plan period, and refers to, amongst other things, a lower level of shale which has been little exploited so far. It would be premature to identify the site for waste tipping in view of the potentially lengthy life remaining to the quarry. One would not wish to sterilise mineral resources or to pre-judge the situation in the rather distant future.
- 16.3 I deal in Chapter 16 of the Policy Framework volume of this report with the question of need for further landfill sites. There I conclude that there is not the evidence to allow for a decision either way, pending the completion of the relevant waste strategies. In these circumstances, I support the use of a criteria-based policy for the determination of planning applications. It is not known whether the objection site would meet the criteria of the relevant RDDP policies. In particular, it is not clear what the Best Practicable Environmental Option for the particular waste stream would be. As landfilling is the lowest level in the hierarchy of methods of waste treatment, this is another reason why I consider that the objection site should not be allocated as a landfill site. It may be that a method of dealing with the waste could be found which is preferable to landfilling.

Recommendation

- 16.4 **I recommend that no modification be made to the RDDP.**