

YOR.2712.003

15th January 2019

Planning Policy
4th Floor
Britannia House
Hall Ings
Bradford
BD1 1HX

Dear Sirs,

**Addingham Neighbourhood Plan Regulation 16 Public Consultation
November 2018**

I am instructed to make representations to the Addingham Draft Neighbourhood Plan on behalf of my client, [REDACTED]. These representations relate primarily to matters surrounding housing development and promotes the site North of Moor Lane, Addingham, as a proposed housing allocation.

Pegasus Group recognise and support the opportunity provided by neighbourhood planning to create a positive planning framework at a local level that supports sustainable development. Indeed, Pegasus Group are actively involved in the preparation of neighbourhood plans nationally and have significant expertise in this regard. This response is intended to provide constructive feedback on the Neighbourhood Plan as drafted.

The Addingham Neighbourhood Plan has been prepared by Addingham Parish Council, who form an appropriate qualifying body. The qualifying body submitted an application for the designation of the Addingham Neighbourhood Area on 20th January 2015. This was subject to consultation following which, Bradford Metropolitan District Council approved the designation of the neighbourhood area on 23rd June 2015.

In accordance with Regulation 14, Addingham Parish Council produced a draft version of their Neighbourhood Development Plan which was the subject of a formal consultation for 6 weeks from 13 July to 7 August 2018.

Addingham Parish Council has now submitted its proposed Neighbourhood Development Plan to the Council under Regulation 15 of the Neighbourhood

Planning (General) Regulations 2012. In accordance with Regulation 16 (Publicising a plan proposal), the Council would like to invite comments from organisations and individuals on the submitted Neighbourhood Plan and supporting documents. The consultation period runs from 14 November 2018 to 12pm 16 January 2019.

Planning Policy Context

Paragraph 11 of the National Planning Policy Framework (NPPF) states:

"11. Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area ; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Paragraphs 12 and 13 of the NPPF make clear that the 'presumption in favour of sustainable development' applies to neighbourhood planning. As explained by NPPF paragraph 13, critically this means neighbourhoods should *'support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.'*

General Comments

It is a requirement of Neighbourhood Plans to conform with the adopted Development Plan. In this case, the Bradford Local Plan Core Strategy Development Plan Document (DPD) adopted at Full Council on 18th July 2017. This document forms part of the Local Plan for Bradford that will, following its progression, be read in line with the Allocations DPD.

With respect to housing provision, Policy WD1 of the Core Strategy identifies that Wharfedale will accommodate 1,600 dwellings and approximately 5Ha of new employment land in the period up to 2030. In accordance with this policy Addingham will accommodate 200 new residential units by 2030.

The Council's most recent SHLAA is the Second Update dated July 2015. The document identifies that of the 18 sites submitted for Addingham, 3 sites are suitable now and have the capacity of being able to yield 78 units. Each of these sites have existing planning permissions therefore are not contested in terms of their provision. Taking into account that 78 units were accepted to be suitable now, this resulted in a total of 122 units to still be delivered. Although this number may have reduced by a minor amount through recent planning permissions, the vast majority has not and the exact location of this development is to be determined as part of the Allocations DPD.

Policy ANDP1 of the Neighbourhood Plan relates to new housing development within the village. The policy states that within the existing built-up area of Addingham, new development for housing will be supported, subject to meeting certain criteria.

The principle of supporting housing development within the settlement limits is in accordance with national policy. However, Policy ANDP1 is silent on housing development located outside of the settlement limits. It is considered that the Neighbourhood Plan needs to be clearer on how such development would be assessed. This is particularly relevant to Addingham given that the housing requirement for the settlement (as identified in the adopted Core Strategy) is such that it would necessitate housing development to be located outside of the current development limit boundaries.

Whilst it is understood that the Council are currently reviewing the settlement boundaries through the production of their Allocations DPD, to date the development limits have not been altered since the Replacement Unitary Development Plan (RUDP) in 2005. Therefore, by supporting housing development within the development limits only, the Neighbourhood Plan would result in a conflict with the adopted Development Plan which requires the village to accommodate 200 new residential units over the plan period.

It is noted that the Neighbourhood Plan does not propose any housing allocations, and it is felt that the Parish Council are missing the opportunity to direct small scale housing development to most appropriate locations across the village. It is therefore considered that the Neighbourhood Plan should provide a more proactive approach to accommodating future housing development. Paragraph 69 of the NPPF supports this approach by stating that:

69. Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.

On this basis, we would encourage that the Parish Council give consideration to the possibility of allocating housing sites across the village, and request that consideration is given to the site at North of Moor Lane, Addingham.

Moor Lane, Addingham

The site is located at land to the north of Moor Lane, Addingham. The total area of the site is approximately 0.91 hectares, which comprises of agricultural land. A site location plan of the site is provided below:

Figure 1: Site Location Plan



The southern boundary abuts Moor Lane which is an adopted highway that was truncated by construction of the Addingham By Pass in the mid-1980s, located on the western boundary of the parcel. To the east is existing residential development. A stream located on the northern boundary separates the site from the open countryside beyond. On the southern side of Moor Lane there is new residential development which is currently being built for 11 residential units (Planning ref. 14/01233/OUT and 15/05738/REM). Moor Lane itself has been recently upgraded in order to serve this development. To the north, established tree planting will protect the site from long distance views and impacts.

It is believed that this site would be entirely appropriate for housing. The site accommodates development on three sides in the form of existing residential dwellings to the east, the new development on Moor Lane to the south and the A65 by pass to the west. Since the original designation of the Green Belt there has been a material change in character of the site through the construction of the bypass and the dwellings to the south. As such, it is now considered that the site lends itself to infilling and the 'rounding off' of this part of the village. This part of the current Green Belt is clearly outdated and the proposals will provide a clear and defensible boundary to the Green Belt to the north.

The site is of a scale (less than 1 hectare) which the NPPF encourages Neighbourhood Plans to promote. The site benefits from the fact that it would not impact upon protected open or Local Green Spaces in the village, lead to the loss of an identified community recreation facility and would preserve the designated heritage assets across the settlement, including the Addingham Conservation Area. Indeed, many of the other sites put forward as part of the Council's SHLAA are within the village Conservation Area or immediately adjacent to it. They would therefore materially impact on the Conservation Area, where as the site North of Moor Lane would have no impact whatsoever.

A key element of the NPPF published in July 2018 relates to the deliverability of housing sites which is fundamental to Council's meeting their housing need. In this case, the site has key infrastructure already in place and excellent access from the recently improved Moor Lane. The site is also free from any significant constraints, such as flood risk or designated heritage assets. The site also benefits from a willing land owner, who has a renowned reputation and track record for building new and converted homes of the highest quality in the local area. This site is therefore considered to be highly deliverable.

Overall, whilst our client is supportive of the draft Neighbourhood Plan, it is felt that revisions should be made in accordance with the comments above. There is an opportunity which is not being realised for the Neighbourhood Plan to direct the allocation of housing across the village, and we would encourage that the Neighbourhood Plan takes advantage of this.

We would request that consideration is given to the allocation of the site North of Moor Lane which is of a scale that can be delivered and can contribute an appropriate level of housing to the village without any material impacts on the village or its residents.

Thank you for your time and consideration of this matter.

Yours sincerely

