

# Bradford District Draft Local Plan 2020-38

## Preferred Options Consultation

### Response by Addingham Civic Society

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#### EXECUTIVE SUMMARY

Addingham Civic Society (ACS) welcomes many of the overarching policies contained in the **Preferred Options Draft**. However policies are valueless unless they translate through to, and form the basis of individual settlement plans. ACS has demonstrated this is simply not the case for Addingham and has presented evidence to substantiate it.

Bradford's Draft Local Plan does not respect the village's very sensitive environmental setting, its "Local Service Centre" status within the Plan Settlement Hierarchy, nor does it adhere to key elements of Addingham's approved Neighbourhood Plan (adopted 2020). There is no specific evidence offered in support of the latest increase in the housing target from 75 to an unsustainable 175 for the Plan period to 2038.

To address these issues the Housing Requirement for the village needs to be reduced back to 75 dwellings for the duration of the Plan through to 2038. As stipulated in the adopted Neighbourhood Plan, development should be achieved utilising carefully selected small sites with least environmental impact. Site AD/5H should be turned into a nature reserve; the Society proposes a new brownfield site for housing, within the Green Belt but with outline planning consent for a motel. A combination of sites AD1/H, AD2/H, AD6/H and AD8/H together with the "Motel Site" can provide 78 houses and minimise environmental impact, preserve important Green Spaces, whilst minimising loss to Green Belt.

Sites AD3/H, AD4/H and AD7H have been excluded from consideration – they are unacceptable for development owing to the permanent adverse impact they would inflict on the village.

The on-going repercussions of Covid 19 will provide an increase in the number of new housing units in towns and cities within 5 years, reducing the need for Green Belt release.

Future housing development aspirations for Addingham, beyond 2038, must be scaled back to avoid irreversible damage to the village's vitally important built heritage, landscape setting and ecosystems.

## **INTRODUCTION**

Addingham (ACS) currently has 410 members (13% of the total village population) and is growing. It is an umbrella organisation comprising specialist groups covering heritage, environment, planning and building conservation and more recently performing arts. The Addingham Environment Group (AEG) has 259 members of whom 116 are also members of the Society and included in the number above. AEG is itself divided into specialist sub-groups providing a comprehensive oversight of the local environment. Every aspect is systematically studied, recorded and translated into environmental protection and improvement measures. The Society is fortunate to be able to call on the knowledge and expertise of a wide range of professionals and specialists both working and retired. They formed the core of the Neighbourhood Planning Group. The Neighbourhood Plan was formally adopted by Bradford in 2020.

ACS's planning and environment groups have done their best to do justice to and engage with this consultation together with its substantial amount of supporting documentation. However, the foreshortened consultation period of 6 weeks has meant detailed examination has had to be concentrated on the Plan's impact on Addingham and BMDC's portion of the Wharfe Valley, rather than the minutiae of key overarching policies. Along with other village organisations the Society has kept Members informed regarding the consultation through its Monthly Newsletter and Zoom meetings.

Addingham is located in the Wharfe Valley in the northern extremity of West Yorkshire, close to the boundary with North Yorkshire. To the southwest are the South Pennine Moors and to the northeast the North Pennine Moors, on the opposite side of the valley. Environmentally, the section of the Wharfe Valley which lies within the Bradford Metropolitan District Council (BMDC) area is one of the "Jewels in Bradford's Crown", but is extremely fragile and sensitive to urban encroachment. For this reason the majority of it comes within European designated Special Protection Areas (SPA) and Special Areas of Conservation (SAC) protection zones associated with the adjacent moorland. It is different in landscape character to the rest of Bradford District having much more in common with the North Pennines. The equivalent environment on the opposite side of the River Wharfe is heavily protected by AONB and National Park designations.

Given the outstanding nature of BMDC's section of the Wharfe Valley it is subject to increasing pressure from tourists, walkers, swimmers and cyclists. The current Covid lockdowns and partial relaxations have increased these activities. All this is to be welcomed provided the right facilities are in place, including adequate public access transport, parking and well-maintained signed footpaths. However the unrelenting pressure for built development, particularly housing, is a major concern and if not carefully controlled, highly damaging to the fragile natural environment and built heritage.

Addingham is a **linear village** developed along the Ilkley/Skipton road (now the A65), which by-passes the village to the south. Significant housing development has taken place since the construction of the A65 by-pass. However the linear nature of the settlement is still recognisable and this is fundamental to its character and the setting of its many listed buildings.

Originally a farming community, the proximity of water power and transport links prompted the industrialisation of the village with 6 operating cloth/woollen mills at its height. Eventually the Ilkley rail line was extended through Addingham to Skipton. A combination of the decline of the wool industry, removal of the rail line and construction of the A65 by-pass has heralded a transformation of Addingham, from a bustling town to a characterful rural Dales village. Buildings are predominantly constructed of stone and there is a rich legacy of listed and significant buildings/monuments spanning the centuries back to the original farming community. The village has over 129 listed buildings/monuments and therefore setting is a very important consideration. It has a population of 3,119 of which 36.8% are aged 65+ compared with an average of 16.7% for West Yorkshire as a whole. The average house price is £305,862 compared to the West Yorkshire average of £183,194. For new build houses the average "affordable purchase price" (at 85% of the full selling price) is £259,982.

## **KEY COMMENTS AND CONCERNS**

These will be addressed in the context of questions posed in the consultation documents.

Question 116 - Addingham Local Area Strategy and Plan - please provide any comments you may have on the area strategy? If you have an alternative to the approach undertaken, please provide further details and evidence in support.

ACS welcomes many of the overarching policies contained in the Preferred Options Draft – especially the focus on environment, green infrastructure, climate change, good design and housing standards. **However it strongly disagrees with the imposition of 175 houses for the village and the severe adverse long term impact this will have.**

Addingham is subject to many levels of planning regulation from the high-level National Planning Policy Framework (NPPF) through Bradford's Draft Local Plan (LP) to the recently adopted Addingham Neighbourhood Plan (NP). Clear guiding policies are set out in the NPPF of which the following are very relevant in this instance. In the section **Core Planning Principles, Paragraph 17** it sets out 12 land-use principles which should underpin both plan-making and decision-taking. Three of these are pertinent to this response, as follows:-

- Contribute to conserving and enhancing the natural environment, and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in the Framework.
- Encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided it is not of high environmental value.
- Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life to this and future generations.

In addition, **Section 9, Protecting Green Belt Land** states at paragraph 80:

- Green Belt serves 5 purposes:
  - To check the unrestricted sprawl of large built-up areas
  - To prevent neighbouring towns merging into one another
  - To assist in safeguarding the countryside from encroachment
  - To preserve the setting and special character of historic towns
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Paragraph 87

- As with previous Green Belt policy, inappropriate developments are, by definition, harmful to the Green Belt should not be approved except in very special circumstances.

In summary, new development including housing should be directed firstly to brown field sites. If “green land” has to be considered, land of lesser environmental value should be prioritised wherever possible, with minimal impact on heritage assets. Green Belt should only be used in **exceptional circumstances**. These principles run through Bradford’s Draft LP and the recently adopted Neighbourhood Plan (NP) acknowledging the need for more commercial housing but ensuring it is directed to the most appropriate locations.

The Society’s two fundamental and detailed objections to the Draft Local Plan are as follows:-

### **1. Increase in Housing Allocation**

Addingham was allocated **75** new houses in BMDC’s **Partial Review of the Core Strategy** undertaken in 2019. This figure has now been increased to **175** in the **Draft Local Plan**, an increase of **133%**. The graph at Appendix 1 illustrates this adjustment and compares it to the closest Wharfedale settlement of Ilkley (designated as a Principal Town in the Local Plan). Ilkley’s housing allocation has been **reduced by 40%** since the Partial Review. ACS welcomes this reduction because like Addingham, if the sensitive Wharfedale environment is to be fully protected, options for significant sustainable commercial development are very limited.

The key questions are why Addingham's housing allocation has been increased? What is the justification and how does this accord with the planning framework mentioned earlier?

The graph included at Appendix 1 illustrates the trajectory of Addingham's housing allocations so far. The initial Core Strategy housing allocation was reduced from 400 to 200 just before the Public Examination. Following a successful legal challenge at the Examination on the application of "bird protection zones", all the Wharfedale settlement housing allocations were then increased, with the exception of Addingham, which was maintained at 200. The Government then insisted that local authorities apply a standard overall housing need formula, prompting a Partial Review of the Core Strategy in 2019. Application of the formula reduced the overall housing requirement for the whole of Bradford District from approximately 42,000 to 27,000 over the plan period. As a result, the settlement allocations were reduced, to **500** for Ilkley and **75** for Addingham (see graph). The District-wide housing requirement has not changed since the Partial Review, and it forms the basis for the current Draft Local Plan 2020 – 38 Consultation. However, Ilkley's figure has now been reduced further to **300** while Addingham's has been sharply increased to **175**.

There is no clear definitive evidence in the draft Local Plan to substantiate this increase, which contradicts many of the assumptions underlying the Plan's policies for Local Service Centres such as Addingham:-

- **3.3 Preferred Option – SP3: Hierarchy of Settlements - Local Service Centres and Rural Areas.**
- 3.3.11 The District's Local Service Centres and rural areas form the fourth element of the settlement hierarchy and are shown on the Key Diagram. A reduced scale of growth, compared to urban areas, forms the overall approach in the settlements of Addingham. Baildon, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Oakworth, Oxenhope and Wilsden. Local Service Centres are the villages that provide services and facilities that serve the needs of, and are accessible to, people living in the surrounding rural areas. Local Service Centres include a range of settlement types and sizes.

Para 3.3.12 The Local Plan seeks to prevent the unnecessary dispersal of development to smaller settlements and open countryside while allowing for limited types of development in the countryside in line with NPPE. Each of the Local Service Centres has a defined level of housing growth in the Local Plan, which takes into consideration the scale of the settlement and land opportunities, balancing a modest level of growth to help sustain and support local services and facilities while also providing a greater range of local housing including affordable housing.

- **PLANNING FOR HOMES - 3.8 Preferred Option – SP8: Housing Growth**
- 3.8.40 The technical paper accompanying this policy describes in more detail the difference between the preferred option and the baseline distribution. However, the most notable differences compared to the baseline are:-

A lower level of development in the Local Service Centres which reflects the fact that they are in relative terms less sustainable locations and where land supply alternatives which would not have adverse environmental impacts are limited.

**Addingham's 133% increase stands out as the exception to this statement and if this increase is ratified will permanently change the character of the village.**

Paragraph 3.6.3 briefly mentions the subject of Covid 19, particularly with respect to economic growth. Whilst its long-term effect is hard to quantify it is likely that growth rates through to 2038 are likely to be lower than predicted. This will translate to a lower housing demand. However, a much more tangible effect is the change to home working. This will reduce as the nation emerges from lockdown but current estimates are that **30%** of employees will continue to work from home on a permanent basis. It is being driven by the realisation of industry, retail and commerce that some employees can work just as effectively from home in the future.

This reduces the need for office space in town and city centres and offers the potential to save rental costs and realise property assets. Parallel to this, the high street has taken a very significant hit with many stores large and small closing. Owners are actively looking to re-purpose premises and one of the key options is conversion to residential units. This change has been anticipated by Government who went out to consultation at the end of last year with proposals for **Supporting Housing Delivery and Public Service Infrastructure**, seeking the public's view on widening the scope of Permitted Development making it easier to re-purpose shops and offices etc.

These changes are taking place already in large towns and cities and will be largely completed within the next 5 years, well within the Local Plan period to 2038. Although difficult to quantify, the impact will be very significant resulting in 100's of additional new housing units which are not allowed for in the current draft of the LP. This change is too large to be simply treated under "Windfalls" and will have to be factored in properly. This will help Bradford to meet the 35% housing uplift for the city but will also ease the pressure for new homes on green field sites and particularly Green Belt.

## **2. Overall Environmental Impacts of the Increase in Housing Numbers**

The increased housing requirement in the draft Local Plan results in the allocation of a considerable number of sites, including areas of Green Belt and other environmentally sensitive land. Comments on all the proposed housing sites are summarised later in this submission, but proposed development of 3 sites in particular – AD/3H and AD/4H, otherwise known as Sailor Fields, and AD/7H off Silsden Road – would have particularly damaging environmental impacts. This section therefore describes in detail the environmental features of the village and the impacts that development of these sites would have, under the following headings:

- ❖ Impact on Character of Village and the Conservation Area
- ❖ Impact on Landscape and Landscape Setting of the Village
- ❖ Impact on Biodiversity
- ❖ Impact on Green Belt

Whilst Addingham's Neighbourhood Plan did not include housing site allocations, it comprehensively covered all other relevant physical features of the village in considerable detail, forming the basis of this section of the response. The NP was finalised following extensive local consultation, including public exhibitions, and achieved **94% local support** at Referendum. It therefore reflects the wishes of the community. **It was ratified by Bradford Council only last year**, and its policies incorporated into Bradford Council's statutory planning framework.

### **Impact on Character of Village and the Conservation Area**

AD3/H and AD4/H are portions of a much larger area including "Village Green Space" and known collectively as the "Sailor Fields". The significance of these fields was described in the **Addingham Village Design Statement June 2001** – "Addingham is essentially linear and narrow, having developed from the linking of multiple nuclei from various periods. The fields popularly known as "Sailor Fields" and "Ivy Bank" provide the village with a "waist" that emphasises its elongated, linear plan. They include part of the area originally designated as Green Belt and also an area close to the Main Street designated as Village Greenspace. The role of this land in defining the linear form of the village was emphasised by the inspector at the Green Belt Subject Local Plan Inquiry, when he described how the land "falling towards the central part of Addingham helps substantially to establish the character of the appearance of Addingham as a linear settlement .... Largely contained within a valley". The inspector went on to comment that "The housing development to the east and west of this site serves to emphasise.... the importance of this wedge of open land to the character of the village where all parts have easy access to the open countryside" Approximately ten years later in the 1996 UDP Public Inquiry Report another planning inspector confirmed this view, noting that the "Sailor" fields remained the **"last vestige of the village's once strong linear form."**

- Development along the central spine of what is now Main Street gave rise to the village being known as **"Long Addingham."** This theme was echoed in Bradford's **"2002 Heritage Appraisal of Addingham"** by its Conservation Team - "Addingham is a good example of a linear settlement developed along an important line of communication" also "Open pockets of land remain, and these allow important views out of the conservation area" and "Two areas of open ground, south of the Memorial hall and south of the Sailor inn are proposed for inclusion as important to the setting of the village."

Similar views were expressed in the **2007 Conservation Area Appraisal**. It then carries through to the **Neighbourhood Plan – Paragraph 4.22** “The village also has a Conservation Area designated in 1977, with the boundaries revised in 2004 covering the village’s historic core and significant outer areas of the linear settlement which contains buildings from different eras of the village’s history.” In **Paragraph 7.13** “Addingham’s Listed Buildings and Conservation Area are important protections under the Planning Act 1990, that seeks to preserve the distinctive character of the Conservation Area and its setting. In “planning speak” Addingham Conservation Area is a designated heritage asset.” Finally **paragraph 7.23 a.** “Reinforcement of the historical linear settlement form and use of the natural contours of the land”.

**Housing development on sites AD3/H and AD4/H would further erode the linear nature of Addingham, the setting of the Conservation Area and the character of the village, and is considered unacceptable.**

### **Impact on Landscape and Landscape Setting**

The village is on the northern edge of Natural England’s National Character Area (NCA) 36 – South Pennines. However physically its features accord more closely with adjoining Area 21 – Yorkshire Dales. **Addingham NP Policy ANDP6** “Protecting Addingham’s Landscape Character” sets out clearly the village’s attitude to the local environment. **BMDC’s Landscape Character SPG** notes that Wharfedale has a strong visual connection with the adjoining Yorkshire Dales National Park and the Nidderdale Area of Outstanding Natural Beauty. Wharfedale avoided the full impact of the Industrial Revolution and with strong agricultural land use has retained much of its rural and agricultural character. The SPG identifies the following landscape types for Addingham:

- Wharfedale Floodplain Pasture
- Wharfedale Enclosed Pasture
- Rombalds Ridge Moorland Edge

The “Sailor Fields” are an excellent example of “Wharfedale Enclosed Pasture” landscape type, linking with “Rombalds Ridge Moorland Edge” type to the south of the A65 by-pass. They offer splendid uninhibited views both into and out of the village centre as well as from the Nidderdale AONB/Yorkshire Dales National Park moorland to the north.

Site **AD/7H** off Turner Lane/Silsden Road is less prominent in the landscape but is also typical of “Wharfedale Enclosed Pasture”. The land is grazed with its dry-stone walls intact. Its function is acknowledged under **Constraints and Opportunities** for parcel AD7/H in the Draft Local Plan – “Site adjacent Green Infrastructure link along Turner Lane and **key gateway open space into the village adjacent roundabout.**”

**Housing development on sites AD/3 and AD/4 would have a severe and permanent damaging impact on landscape and the village's landscape setting. Housing development on AD/7 would have a damaging impact on landscape, an important green infrastructure link, and the appearance of a village entry point. Development of all three sites is considered unacceptable.**

### **Impact on Biodiversity**

Virtually the entire village is within 2.5 km habitat protection zones for the South and North Pennine Moors SPA's/SAC's, with some areas covered by both. All the open countryside to the south of the village, including AD3/H, AD4/H and AD7/H are within the protection zone for the South Pennine Moors SPA/SAC.

The village is situated adjacent to the very high landscape value regions of the Yorkshire Dales National Park (to the north) and Nidderdale Area of Outstanding National Beauty (to the east). Connectivity between moorland, enclosed pasture and floodplain pasture is essential for wildlife protection. Excessive development will lead to further fragmentation and cause wildlife disturbance. The recent loss of nesting curlews in the field to the north of Springfield Mount is a prime example of the wildlife attrition currently taking place.

The "Sailor Fields" area (including AD3/H and AD4/H) has intrinsic heritage, archaeological and ecological importance with respect especially to its medieval history, the occurrence of ancient species-rich hedgerows, dry stone walls and its barn owl population. It is used as foraging ground for IUCN Red List threatened species such as curlew and lapwing together with 33 other bird species. The Environment Group systematically monitor bird species and numbers and these are reported annually. The 2020 data relevant to the "Sailor Fields" is included as Appendix 4. It should be noted that site AD/003 mentioned in the recording data covers the green space fields behind the Sailor Pub while site AD/004 covers the adjoining Green Belt land to the south up to the by-pass and includes the draft Local Plan allocations for sites AD3/H and AD4/H.

Despite the barrier created by the A65 road, this area links the village to the Street, Lumb Ghyll Wood and Stegholes Local Wildlife Sites and the wider countryside of Addingham Moorside beyond, forming **a connection of immense value for both people and wildlife.**

Site AD7/H Turner Lane/Silsden Road is a Green Field site made up of three parallel linear fields, separated by dry stone walls. There are many mature trees, hedgerows, and a deciduous woodland (priority habitat) on the adjacent land on the Silsden Road Recreation Ground to the east. It occupies important **green space within the green/blue infrastructure corridor** along Marchup, connecting people and wildlife to open countryside on the western side of the A65.

It also forms part of a **green gateway**, contributing to the village landscape character, helping to soften the entry into the built-up area of the village down Silsden Road, analogous to the entry from Ilkley in the east. The **Daniel Palmer Nature Reserve** with its rich wildlife populations including roe deer and badger lies adjacent to the southern boundary of the site. Although the Reserve already has to contend with traffic on the main road, additional human activity close by will create further unwanted disturbance. Furthermore, **Marchup Beck** runs close by the site in the deeply incised wooded valley beyond the Reserve. Water quality in the Beck is poor. Any major disturbance to surface water runoff to the beck, such as from built development nearby, could hinder current efforts to restore the ecology of the beck downstream.

**Housing development on sites AD/3, AD/4 and AD/7 would have damaging impacts on wildlife and biodiversity, and is considered unacceptable.**

**Impact on Green Belt – Draft Local Plan Policy SP5: Green Belt** includes the following statements:

- A. The extent of Green Belt within the District is identified on the Policies Map and has a valuable role in supporting urban regeneration and transformation, keeping settlements separate, **concentrating development, and conserving the countryside.**
- B. **Due to the acute and intense need for housing (market and affordable), as set out in Policy SP8, and shortage of alternative sites, exceptional circumstances exist in order to deliver the housing requirement for the District over the plan period as set out in Policy SP8, which will require Green Belt releases of the sites** identified on the Policies Map, within Section 5 of the Plan....
- E. **All sites identified as being released from the Green Belt will be required to offset the impact of removing land from the Green Belt through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Proposals which increase the beneficial use of the Green Belt, by enhancing green infrastructure, biodiversity, visual amenity and landscapes or improving derelict land and opportunities for access, outdoor sport and recreation, will be supported where this does not conflict with Green Belt or other policy objectives.**

Given the detailed evidence of the environmental importance of areas AD3/H, AD4/H and AD7/H, the Green Belt protection afforded to them is vital. If that protection is removed and they are developed, the **character of the village and its environment will be changed permanently.** A similar debate took place decades ago when Addingham's Green Belt boundaries were first established. It was concluded that urban sprawl across the "sailor

fields" southwards to the by-pass should be prevented to preserve the landscape, character and setting of the village and protect biodiversity. Currently Addingham still retains its linear nature but regionally, habitat has been lost or degraded and many species have declined markedly including curlews and lapwings, which are now on the IUCN Red List of threatened species.

The Society does not consider **exceptional circumstances** exist for removing this Green Belt protection, amounting to approximately 0.023% of BMDC's total Green Belt. Quite the reverse, **exceptional circumstances** exist to strengthen protection of these areas, retaining the character of the village and its surrounding environment for the local community, the wider public and local endangered wildlife.

No amount of enhanced public access or sport and recreation provision can compensate for the loss.

## PROPOSED HOUSING SITES – SUMMARY COMMENTS

**Consultation Question 117 - The Local Plan sets out a preferred site allocation for Addingham. If you wish to make representations on the site proposed, please provide feedback under this question.**

**If you wish to propose an additional or alternative site(s) to the preferred allocation listed, please also provide a plan with a red line and any further details in support.**

### **Proposed Housing Site Allocations**

The sites proposed for housing in the Local Plan are based on a housing requirement figure which the Society considers totally unjustified, and where development of several of the sites would conflict with many of the draft Plan's own policies. As a result, such large-scale site allocations are not required or justified.

However, in response to the consultation question, detailed comments on each site are set out at **Appendix 2**. ACS also proposes one new site, described in detail at **Appendix 3**. In summary, the Society's views on the acceptability of each of the proposed housing sites are as follows.

### **Development Supported/Acceptable**

AD/8	Church Street/Main Street	8 dwellings
AD/2	Parsons Lane	14
Ilkley Road	Proposed New Site	12
AD/1	Turner Lane	20
AD/6	Moor Lane	24

### **Development Unacceptable**

AD/5	Chapel Street	5
AD/7	Turner lane/Silsden Road	23
AD/3	Main Street/Bypass (East)	49
AD/4	Main Street/Bypass (West)	38

In addition, the village has consistently delivered housing on a small number of windfall sites; this has amounted to around 3 or 4 dwellings per year over a long period of time. This can be expected to continue, and whilst recognising that BMDC have made an allowance for windfalls District-wide, it is clear that future windfalls will continue to meet local housing needs in the village and contribute to Addingham's housing allocation.

In summary, the housing sites accepted by the Society can deliver 78 dwellings, which along with windfalls is considered a realistic and sustainable strategy. The following features of this strategy should be noted:

- The new “Motel” site proposed at Ilkley Road would reuse a brownfield, previously developed site, in line with national and Local Plan priorities; it could provide 12 dwellings in a sustainable location without adverse environmental impact.
- Site AD/5 at Chapel Street has major drawbacks as a housing site but has significant wildlife and biodiversity attributes. ACS considers this site should be turned into a Community Nature Reserve.
- Given the relative concentration of proposals in the Moor Lane/Turner Lane area, site AD8/H and the proposed “Motel” site should be developed first. Sites AD/1H, AD/2H and AD/6H should be phased over the latter years of the LP to 2038.
- Proposed developments in the Turner Lane area would benefit from a new footpath/cycle link to Silsden Road, possibly along the boundary between AD7/H and the adjoining recreation ground. This would improve public access to bus services along Silsden Road and down to the centre of the village.

## CONCLUSIONS

- ❖ The proposals for Addingham in the Draft Local Plan involve a **133% increase** in housing allocation from 75 to 175 homes. There is no concrete evidence for this change which is in marked contrast to other Local Service Centres and the neighbouring Principal Town of Ilkley which has seen a **reduction of 40%**.
- ❖ Bradford’s overall housing requirement has not changed since the **2019 Core Strategy Partial Review**, nor has Addingham’s infrastructure. The new target is unsustainable for the village in terms of medium-term secondary school provision, no railway station and surface and foul water disposal issues. Increases of this magnitude should be allocated to Growth Centres, Principal Towns and Bradford in line with Draft LP and NP policies, which have requisite infrastructure and are much more sustainable.
- ❖ The housing increase will require additional land to be removed from Green Belt with **no specific “exceptional circumstances” justifying it**. As detailed in this document, the removal of 3 sites ADH/3, ADH/4 and ADH/7 will **cause**

**permanent damage to village character, environment, heritage, setting, and ecosystems.**

- ❖ The on-going impact of Covid 19 in terms of home working and a marked reduction in retail will result in the re-purposing of shops and offices mainly to housing units, within the next 5 years. BMDC needs to adjust its housing allocation targets and the requirement to release sensitive Green Belt land, starting with Addingham
  
- ❖ These proposals do not accord with Addingham’s Neighbourhood Plan, adopted by BMDC less than a year ago. Far from being in general conformity with the Draft LP as envisaged, the 2 are now at odds!

## **APPENDICES**

### **Appendix 1 Graph of Wharfedale Housing Allocations**

**See separate attachment**

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### **Appendix 2**

#### **Proposed Housing Sites – Detailed Comments**

The Society’s comments on the proposed housing sites are set out in the following table, along with conclusions on their acceptability for housing development, assessed as follows:

- **Development Supported** – sustainable sites, no or relatively minor drawbacks, closest alignment to Local Plan and Neighbourhood Plan policies, and/or specific site advantages
  
- **Development Acceptable** - less sustainable sites, some drawbacks and conflict with LP/NP policies, but balance of planning judgement that development would be acceptable
  
- **Development Unacceptable** - significant drawbacks/major adverse impact on village character and landscape setting, and/or major conflict with LP/NP policies

Site	Dwellings	Comments
<b>AD8/H Church Street/Main Street</b>	<b>8</b>	<p>Brownfield site, currently a Bradford Council owned stone/grit storage area in unsightly condition. Sustainable location near bus routes and bus stops, with good access to village facilities (Co-op, Memorial Hall and Medical Centre just over 450m) Very important gateway to village from east; good quality design required, reflecting local village character. Several very important boundary trees to be retained/protected. Site has potential for small affordable dwellings.</p> <p><b>Development Supported.</b></p>
<b>Proposed New Site AD/008 Motel Site, Ilkley Road</b>	<b>12</b>	<p>Not allocated for housing in Draft Local Plan. Brownfield, previously developed site, former garage and petrol filling station. Site has lain vacant for many years with benefit of valid planning permission for motel development. Some self-seeded trees and other vegetation but the site is not considered environmentally significant. Site fronts onto bus routes with nearby bus stops and has good access to village facilities - Co-op, Memorial Hall and Medical Centre within 450m, centre of village (Crown Pub) 700m. Loss of relatively small area of Green Belt in this location not significant. Prominent location near village entrance, so good design required; high quality boundary treatment required to south adjoining Green Belt.</p> <p><b>Development Supported.</b></p> <p><a href="#">See Appendix 3 for detailed appraisal of this site</a></p>
<b>AD2/H Parsons Lane</b>	<b>14</b>	<p>Greenfield site on the edge of established residential area, adjoining a recently developed housing site. Currently a grazed paddock in poor condition. Relatively distant from central village facilities as with much of the nearby existing Moor Park residential area, but served by current road network into village. As with other proposed sites in this general area, development would benefit from a new pedestrian/cycle link to Silsden Road. Site owned by Addingham Parish Council, providing major opportunities for housing development to meet local needs such as truly affordable market housing or social rented accommodation. The site has relatively low biodiversity value; an ecological survey should be undertaken to identify any biodiversity</p>

		<p>concerns and mitigation measures. The mature boundary trees and drystone walls should be retained.</p> <p><b>Development Supported.</b></p>
<b>AD/1H Turner Lane</b>	20	<p>Greenfield site in the Green Belt close to long-established residential area; short extension to existing road access required. Largely non-prominent site adjacent bypass, with relatively limited environmental impact on village character; loss of green belt considered not significant. As with other proposed sites in this general area, development would benefit from a new pedestrian/cycle link to Silsden Road.</p> <p>Currently grazed grassland but with relatively low biodiversity value. Ecological survey should be undertaken to identify any biodiversity concerns and mitigate impacts. The mature boundary trees and drystone walls should be retained.</p> <p><b>Development Supported</b></p>
<b>AD/6H Moor Lane</b>	24	<p>Greenfield site in the Green Belt on periphery of existing residential area, directly opposite recently developed housing site. Development would result in local environmental impacts and loss of an area of green belt, but would not significantly affect village character. As with other proposed sites in this general area, development would benefit from a new pedestrian/cycle link to Silsden Road.</p> <p>The site has relatively low biodiversity value except along the boundaries. An ecological survey should be undertaken to identify any biodiversity concerns and mitigate impacts. The mature boundary trees and drystone walls should be retained and a wide riparian zone along the beck on the northern boundary will need to be created.</p> <p><b>Development Supported</b></p>
<b>AD/7H Turner Lane/Silsden Road</b>	23	<p>Greenfield site in the Green Belt, on the edge of the established residential area at the western extremity of the village. Access would require a short extension to the existing nearby road network. The site is made up of three parallel linear fields, separated by dry stone walls, with many mature trees, hedgerows, and a deciduous woodland (priority habitat) adjacent (Recreation Ground). The site is typical of "Wharfedale Enclosed Pasture".</p> <p>The site is very prominent and forms part of a green gateway, contributing significantly to village landscape character,</p>

		<p>helping to soften the entry into the built-up area of the village along Silsden Road.</p> <p>The site also occupies important Green Space within the green/blue infrastructure corridor along Marchup Beck, connecting people and wildlife to open countryside on the western side of the A65.</p> <p>Development of the site and the subsequent residential activity would also impact on the nearby Nature Reserve with its rich wildlife populations, and Marchup Beck in the wooded valley beyond the Reserve.</p> <p>Given the site's significant environmental and landscape roles it is considered unacceptable for development.</p> <p><b>Development Unacceptable.</b></p>
<p><b>AD/5H</b> <b>Chapel Street</b></p>	<p><b>5</b></p>	<p>Location of the former Addingham First School, occupying the footprint of the former school buildings. Opportunity for development on brownfield land in a sustainable location close to the village centre. However, even though the proposed number of dwellings (5) is small, the site has very considerable drawbacks as a housing site along with significant environmental, wildlife and biodiversity attributes. Housing development is considered unacceptable on the following grounds:</p> <p><u>Environment/Wildlife/Biodiversity</u></p> <p>Together with the adjacent land (former school playing fields – designated as Local Green Space in the Neighbourhood Plan) the site has very high intrinsic biodiversity value. Following closure of the school, the whole site is rewilding, with a mosaic of habitats including the running water of the beck on two sides, woodland along the edge of Back Beck, boundary hedgerows with hedgerow trees, and tussocky grassland, with a wet flush.</p> <p>The site has been colonised by vegetation, and is now an important wildlife/biodiversity site supporting highly diverse wildlife populations. It also forms part of the Back Beck/Long Riddings 'green/blue infrastructure' corridor linking the green spaces within the village to the open countryside beyond, providing connectivity and a tranquil space for both wildlife and people. The inevitable light and noise pollution caused by construction and subsequent housing and vehicles would create further disturbance leading to loss of wildlife.</p>

		<p><u>Vehicle Access</u> Chapel Street is very narrow and serves existing residents, and would be dangerous and unacceptable as site access. Even a small increase in traffic would adversely affect the tranquillity of this part of the Back Beck Lane green corridor and damage a very well-used safe walking route to the Primary School for village children.</p> <p>The possible alternative new access from School Lane suggested in the Local Plan would severely damage beck, woodland and grassland habitat in the designated local green space adjacent to the site leading to overall loss of biodiversity.</p> <p><a href="#">See further information set out at end of table</a></p> <p><b>Development Unacceptable</b></p>
<p><b>AD/3H Main St/Addingham Bypass (East)</b></p>	<p>49</p>	<p>Large greenfield site in the Green Belt, mainly a large pasture used for sheep grazing. Site adjoins older long-established residential area, to be accessed off existing road network through this area.</p> <p>Along with AD/4H, this site forms part of a larger area known as Sailor Fields. There is a long history of reports, studies and planning decisions demonstrating how critical this area is to the character of Addingham, its Conservation Area and landscape setting. Full details of the importance of the Sailor Fields and the significant damage that development would have are covered in the main body of the Society’s response earlier, but the key factors are summarised here.</p> <p>Addingham Conservation Area – much of the character of the Conservation Area derives from the linear form of the village and the swathes of green open land which sweep down into the centre of the village at various points, giving the village a “waist” and offering magnificent views outwards.</p> <p>Planning Inspectors have noted that the existing housing developments to the east and west of the Sailor Fields serve to emphasise the importance of this wedge of open land to the character of the village, and this has been reinforced in Conservation Area appraisals and other studies over time</p>

		<p>Landscape – the Sailor Fields have been identified as an excellent example of the Wharfedale Enclosed Pasture landscape type, linking with the Rombalds Ridge Moorland Edge type to the south of the A65 by-pass. They offer splendid uninhibited views both into and out of the village centre as well as from the Nidderdale AONB/Yorkshire Dales National Park moorland to the north.</p> <p>Green Belt – the openness of the green belt would be compromised if this site was developed; exceptional circumstances have not been demonstrated in the draft Plan.</p> <p>Development of this site would have a major detrimental impact on these widely recognised and critically important features of the village. It would also be in conflict with many of the environmental policies in the Local Plan itself, and with the Neighbourhood Plan which reflects strong local support for protecting village landscape and character and locating any new development on small infill sites.</p> <p>There are further objections from a wildlife and biodiversity perspective. The site forms part of the larger area of pasture between the village and the bypass which is used by foraging birds including waders associated with the South Pennine Moors SPA to the south. Bird recording data is included at Appendix 4 which demonstrates the importance of this location</p> <p>For all the above reasons, it is considered that development of this site would be extremely damaging.</p> <p><b>Development Unacceptable</b></p>
<p><b>AD/4H Main St/Addingham Bypass (West)</b></p>	<p>38</p>	<p>Large greenfield site in the Green Belt, adjoining long-established residential area of Street House Farm. Development would be accessed off existing road network through this large estate</p> <p>The site is a large pasture used for sheep grazing, and along with site AD/3H forms part of the larger Sailor Fields area.</p> <p>The comments included above for site AD/3H apply equally to this site, which is therefore also considered completely unacceptable for housing development.</p> <p>Regarding wildlife and biodiversity, the well-wooded Coppy Beck runs along the back of the Street House Farm estate and</p>

		<p>forms the western boundary of the field. Good hedgerows and mature trees line the other boundaries. The biodiversity value of the site lies in these boundary features and the use of the site by foraging birds including waders associated with the South Pennine Moors SPA to the south.</p> <p><b>Development Unacceptable</b></p>
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**Site AD/5H Chapel Street – Further Information**

Recording has shown this to be one of the best sites for butterflies in the village both in abundance and diversity; the site also has good bumblebee populations and a wide range of birds. Chiffchaff, kingfisher, tree creepers and woodpeckers are all regularly seen along with more common birds. It is also an important foraging site for bats (pipistrelle, soprano pipistrelle and noctules have been recorded) and brown trout and bullheads occur in the Beck.

The Landscape Character Assessment commissioned as part of the evidence base for the Addingham Neighbourhood Plan, supports the importance of the whole site as part of the Addingham Enclosed Pastures landscape character area, now that the site is rewilding.

Alternative Proposal

The whole site should be designated as Local Green Space for its biodiversity value and managed as a village Wildlife Reserve. To this end, ACS would support a Community Asset Transfer. As a wildlife reserve, the intermittent occurrence of flood water would be of little concern. Indeed, it could be a positive attribute contributing to Natural Flood Management measures that may be implemented in this part of the village in future.

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**Appendix 3**

**Proposed New Housing Site – Motel Site, Ilkley Road /Main Street**

**Location and Description**

The site is located between the village cricket ground and existing housing and telephone exchange building on Ilkley Rd/Main Street at the eastern entry to village. Formerly the site of a garage/petrol station, it has lain vacant for many years although it benefits from a current long standing planning permission for a motel development which has never been

implemented. Level site with a slight slope down into the site from the road which is to the north. Naturally overgrown with some small self-seeded trees mainly to the perimeter. Rubble from the cleared site forms a mound alongside the road frontage, with fencing installed in the past as an environmental improvement measure.

The site is defined by a low stone perimeter wall with the ground at the site slightly higher. Alongside the eastern boundary is the white blank flank wall of the telephone exchange - equivalent to two storeys in height.



### Site Area and Capacity

The site covers an area of approximately 0.37 ha. At the Local Plan minimum density of 35 dwellings per hectare, the site could accommodate 12 dwellings.

### Status/Policy

A number of policy considerations apply to potential development of the site.

### Green Belt

Although a vacant, relatively unattractive previously developed site, it is located within the Green Belt. It forms a clearly defined portion of a much larger area of green belt (parcel AD008) which was assessed during Bradford Council's recent Green Belt Review. The review concluded that development of this parcel of land should be ruled out on environmental, landscape and green belt grounds.

The Society agrees strongly that development of the whole of this parcel of green belt land would be highly damaging to village character and landscape setting. However, development restricted to the footprint of the former garage/motel site would have no such impact and would bring positive environmental benefits.

The National Planning Policy Framework states (para 145) that the construction of new buildings within the green belt is inappropriate. However, there are a number of exceptions, including:

*(g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

*– not have a greater impact on the openness of the Green Belt than the existing development; or*

*– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority*

A small housing development on the site as proposed would not have any greater impact on, or cause substantial harm to, the openness of the green belt compared to the motel development, which could be implemented at any time.

#### Current Planning Permission

The site has valid permission for a motel development. However it is considered that a small, well-designed housing development would offer many more significant benefits in terms of both visual amenity and helping to meet local housing needs in a sustainable location.

#### Prioritising Brownfield Land

The site presents a key opportunity to use brownfield land, complying with Local Plan and NPPF priorities. A small housing scheme on the site would also comply with the Addingham Neighbourhood Plan policy for housing growth to be accommodated on small infill sites.

#### Village Encroachment

The site is clearly part of the village settlement envelope – there is a group of existing dwellings (and the telephone exchange building) on the site's eastern boundary (towards the Ilkley direction), whilst housing site AD/8H at Church Street proposed by BMDC itself in the draft Local Plan lies across the road from the site and slightly further to the east (in the Ilkley direction) than the motel site.

#### **Access**

The site fronts the main access of Ilkley Road/Main Street, with good sight lines. It is on bus routes with a bus stop in front of the site entrance and a level footpath walk to village

facilities (Medical Centre, village hall and shops - 450m and village centre (Crown Pub) at 700m.

## **Design**

This is an important and prominent site on the main road through the village, and at the village entry point from the east (Ilkley direction). A high-quality design would be required, reflecting the scale, materials, features and character of traditional village buildings.

The site could accommodate 12 dwellings, potentially in a courtyard layout presenting an attractive frontage to the main road. The development would have the added benefit of helping to screen and minimise the unattractive visual appearance of the adjoining telephone exchange building.

The development would back onto open green belt land to the south, and therefore high quality boundary treatment would be required, including appropriate planting with natural species. This would provide a strong defensible boundary to the development and avoid the risk of encroachment into the green belt.

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**Appendix 4 follows**

## Appendix 4

### Bird Recording Data

The following table shows recorded numbers of birds at the large area of open green space between the village and the bypass known as Sailor Fields. As explained earlier, this area includes two of the housing sites proposed in the Local Plan (Sites AD/3H and AD/4H).

The data was recorded in 2020 by Addingham Environment Group.

	AD/003	AD/004
Barn owl	14	5
Blackbird	14	14
Blackcap	0	0
Blue tit	8	11
Brambling	0	1
Bullfinch	0	1
Buzzard	0	4
Carrion crow	15	18
Chaffinch	2	4
Common gull	0	1
Curlew	0	11
Dunnock	0	2
Fieldfare	0	1
Goldfinch	1	2
Great tit	3	7
Greenfinch	0	0
House martin	0	2
House sparrow	1	0
Jackdaw	6	4
Jay	2	3
Long-tailed tit	1	0
Magpie	1	15
Mallard	0	1
Mistle thrush	1	2
Pheasant	0	1
Pied wagtail	0	1
Red kite	0	2
Redwing	0	1
Robin	1	9
Rook	0	3
Song thrush	0	5
Sparrowhawk	1	1
Starling	1	3
Stock dove	0	1
Swallow	0	2
Swift	2	2
Tawny owl	0	1
Treecreeper	2	0
Woodpigeon	10	14
Wren	2	1
Number of species	20	35
Number of reports	88	156

End of document