

BMDC Local Development Framework and its implications for Wilsden

As a resident and Architect in Wilsden the recent consultation by BMDC in relation to their Local Development Framework proposals are of considerable interest. I think it is important to provide some perspective and background to recent news regarding the development plans in general. I have therefore prepared these initial notes within a very short timescale to hereby publish. I've endeavored to provide a balanced account although I make my own view available where possible.

Background

The body undertaking the consultation is the local council (BMDC). Every Local Authority in England have a statutory development plan called the Unitary Development Plan (UDP) for the whole district in which every piece of land has a land classification (Greenbelt / Village Green Space / Safeguarded Land / Brownfield etc etc.) This was last updated in 18th Oct 2005 and called the Replacement UDP (RUPD). The plan is subject to renewal or update every 10 years or so and they are currently working on a new development plan as requested of every Local Authority by central government in 2008. This time it will be called the 'Local Development Framework' (LDF) and once adopted it will replace the RUPD.

The local council is also required to identify a significant number of sites for housing in accordance with the central government's Strategic Housing Land Availability Assessment and these sites are to be included in the LDF and therefore sites of a similar nature to those in Wilsden have been identified throughout the BMDC area. Similar concerns to those identified in Wilsden are being voiced in Steeton / Silsden / Oakworth / Thornton / Queensbury / Baildon etc etc. The Telegraph and Argus have a webpage titled "Save our Green Spaces" which documents concerns raised in many different locations. - http://www.thetelegraphandargus.co.uk/news/news_green/news_green_news/1/

It is worth noting the Local Authority is mandated to make this provision of land and identifying the most suitable sites is not an enviable task. Where sites are identified that impinge on individual's amenity, whether that be in terms of their view, open space, local infrastructure etc the people it directly effects will object. Given the Local Authority's requirements I suggest a pragmatic approach has to be applied when raising objection to these proposals and a view taken in relation to the bigger picture.

In assessment of sites the Local Authority should currently grant due consideration to the policies set out in Planning Policy Statement 3 (PPS3 – Housing) and a copy of this document is available for download at:

<http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> .

In particular pages 5 to 7 appear to outline the fundamental considerations for determining policy.

I would note that reform of general planning policy is also proposed at present as documented in an earlier blog of 28.12.2011:

<http://www.avarchitects.co.uk/blog/planning-reform-debate>

Implications for Wilsden

Proposals outlined by BMDC in relation to the LDF clearly have potential to cause significant impact on the village as a whole given the sites which have been identified and the scale of potential development. It appears the Local Authority have identified that Wilsden can potentially accommodate a larger number of new houses (750) than adjacent villages of Cullingworth & Harden which have sites identified to accommodate 250 & 150 homes respectively. It also appears that the sites in Cullingworth and Harden do not expand the village boundaries significantly and do not utilise substantial areas of currently designated Green Belt land.

In weighing up the merits of the proposals for Wilsden I suggest there are a few main issues for consideration.

Infrastructure

I understand, via previous and informal discussion with Parish Council members, albeit without detailed statistical information, the infrastructure of the village is already under considerable pressure. Statistical based evidence would shed more light on capacity of different elements and will present a more robust case for or against future development. In particular the medical centre, the primary school, provision of public open space, the utilities and services, drainage, capacity of roads and public transport all need to be assessed.

I understand the medical centre is at maximum capacity and serving the surrounding villages of Cullingworth, Harden and Denholme. I note these villages also have additional housing proposed potentially exacerbating the problem further.

In regard to the school I had first hand view of the facilities when tasked with selecting the school for our eldest child last year. Wilsden school was originally a single form primary school educating children up to the age of 9 at which stage they transferred to a 'middle school' in a 3 tier school system. Since, the school has had to accommodate additional 2 year groups due to the transition from a 3 to 2 tier education system in the local area, necessitating primary schools to educate children up to the age of 11. Furthermore, the school has been converted to a 2 form entry more recently.

The school has expanded yet remains on its original site. Facilities are more densely packed in and outdoor amenity space has been continually reduced. On the other hand Harden Primary remains single form entry and whilst we live only a stone's throw away from the Wilsden School the fact we selected to send our child to Harden tells its own story.

The volume of vehicular traffic through the village is also a concern. Particularly commuter traffic presents congestion problems along Wilsden Main Street which is relatively narrow and I suggest not designed for such heavy volume. Needless to say, any expansion of the village and surrounding villages will only serve to increase volume.

Infrastructure is one criterion the local authority has to assess in determining policy. I anticipate without significant investment and improvement to the infrastructure of the village, the accommodation of 750 new homes cannot be sustained.

Village Character

The character of Wilsden in my view is critical to the debate both as existing and how it will be perceived in the future. Wilsden currently remains a village although development over its recent history has resulted in considerable expansion although the it remains bound by Green Belt. As the extent of Green Belt is diminished I suggest the perception of a village settlement diminishes too.

Wilsden is in essence a linear settlement established either side of a main road. Development of land identified at Harden Lane and Shay Lane in particular, will extend the village at either end and the settlement takes a step closer to merging with adjacent villages of Harden and Sandy Lane respectively. Progressive deterioration of the village boundary will alter the character of the village and potentially diminish the associated sense of community.

Wilsden has an extensive Conservation Area which offers much to its character. This will remain intact although extensive development to the periphery of the village will diminish its value as it is swallowed up in a larger settlement.

Sustainability, the Green Belt and Marketability

The main potential sites identified in Wilsden involve the reclassification of Green Belt land to enable housing development. To emphasise the perceived importance of Green Belt I quote the wording of PPG2: Green Belts (published in 1995 and amended in 2001):

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness.

Green Belts can shape patterns of urban development at sub-regional and regional scale, and help to ensure that development occurs in locations allocated in development plans.

They help to protect the countryside, be it in agricultural, forestry or other use.

They can assist in moving towards more sustainable patterns of urban development.

Purposes of including land in Green Belts

There are five purposes of including land in Green Belts:

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns from merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Efforts to address the housing deficiency presented throughout the country via development of Brownfield sites and intensification of urban areas have been stated to preserve the Green Belt wherever possible over the last decade or more. This approach, and in particular the preservation of Green Belt is appropriate, in my opinion, although as outlined in the background introduction a balanced assessment of the bigger picture has to be granted.

Clearly there is a housing deficiency identified and development of only Brownfield sites alone will not address this issue. Secondly the marketability of new homes is critical to delivery, developers are more likely to construct new homes in desirable locations which present commercial opportunity. Finally, I also note the ‘financial motivation’ criticism targeted at central government for recent planning reform proposals. In the current economic times making desirable areas of Green Belt land available for Housing development appears to offer a relatively simple solution to assist with economic growth.

Nevertheless, I perceive planning reform and reclassification of Green Belt presents a huge risk to our countryside which is valued by so many people and will also have considerable ecological impact. As outlined above it provides openness to our environments and safeguards the countryside from encroachment. Furthermore, the countryside also represents an invaluable asset in terms of commercial agriculture and leisure.

The Green Belt is not a resource that can be replenished and therefore I consider it imperative to preserve the Green Belt wherever possible. Favouring development sites that infill existing settlements or using previously developed land will ensure preservation of Green Belt. **Where it is considered Green Belt has to be utilised, the site selection should minimise the impact on established settlement boundaries.**

I intend to submit, in due course, a consultation response to BMDC based upon these initial thoughts before the deadline of 20th January 2012.