

The Neighbourhood Planning (General) Regulations 2012
Regulation 16 – Publicising a plan proposal

COMMENT FORM

For Office Use only:	
Date	
Ref	

**PUBLICATION OF THE BURLEY-IN-WHARFEDALE NEIGHBOURHOOD DEVELOPMENT PLAN PROPOSAL
SUBMITTED TO BRADFORD METROPOLITAN DISTRICT COUNCIL FOR EXAMINATION**

MONDAY 12TH JUNE TO MONDAY 24TH JULY 2017

The Burley-in-Wharfedale Neighbourhood Development Plan, prepared by Burley Parish Council, has been submitted to Bradford Council for examination. The Council must now publicise the plan proposal and supporting documents and seek comments.

Please use this comment form to submit your views on the proposal. Details of how to view the proposed plan and supporting documents are available on the Council's website: <https://www.bradford.gov.uk/consultations>.

PART A: PERSONAL DETAILS

Response forms must include a name and address otherwise your comments will not be taken into account.

	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title	Ms	
Full Name	██████ Llewellyn	
Job Title (where relevant)		
Organisation (where relevant)		
Address	████████████████████ Burley In Wharfedale	
Post Code	LS29 ██████	
Email Address	██	
Telephone Number	██	

Please return completed comment forms by **5pm on Monday 24th July 2017** to:

- **E-mail:** planning.policy@bradford.gov.uk
- **Post:** Neighbourhood Plans, Development Plans Team, Bradford Council,
4th Floor Britannia House, Broadway, Bradford, BD1 5RW

Any comments received after this date will not be accepted.

How we will use your personal details

Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act 1998, the personal information provided will only be used for Council purposes associated with the Local Plan and Neighbourhood Planning consultations. If at any point in time you wish for your details to be removed from the Local Plan database, please contact the Development Plans Team by E-mail planning.policy@bradford.gov.uk or phone (01274) 433679.

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PART B – YOUR COMMENTS

Please use a separate Part B sheet for each comment. Additional forms can be downloaded from the web page.

1. To which document does your comment relate? Please place an 'X' in one box only

Submission Neighbourhood Development Plan	X	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

2. To which part of the document does your comment relate?

Whole document		Section	1.8	Policy	
Page Number	7	Appendix			

3. Do you wish to? Please place an 'X' in one box only

Support		Object		Make an observation	X
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4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

Whilst I am in broad support of a lot of what is contained in the Neighbourhood Plan, and appreciate the Parish Council's efforts, the following and the additional attachments are some points I would like to be addressed.

Section 1.8 needs further clarification and addition of some points, within the context of what's required under NPPF guidelines:

- Bradford Council's Local Plan and Core Strategy haven't been delivered or adopted yet. This needs to be made clear in this section of the Neighbourhood Plan.

It is important, to help address some of the community's infrastructure concerns, that we need contractual assurances from BDMC and Developers, as appropriate, regarding infrastructure improvements to educational facilities, travel infrastructure (rail, road and cycle networks), medical facilities, etc. Such infrastructure improvements should be delivered at commencement of development works, or within a reasonably short time-frame. Contracts for early delivery would ensure infrastructure improvements are delivered and not reneged upon.

This is a fundamental part of the NPPF's sustainable development policy.

5. Please place an 'X' in the box if you would like to be notified whether the plan proposal is made (adopted) by the Council or not:	X
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6. Signature:		Date:	14/07/2017
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Consultation Statement		Other (please specify)	

2. To which part of the document does your comment relate?

Whole document		Section	1.11 – 1.12	Policy	
Page Number	8	Appendix			

3. Do you wish to? Please place an 'X' in one box only

Support		Object	X	Make an observation	
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As mentioned on page 8, the Burley In Wharfedale Neighbourhood Plan is in conformity with the 2005 Replacement Unitary Development Plan (RUDP); however, it's in the process of being replaced by the Local Plan.

The fact that Bradford MDC don't yet have an adopted Local Plan that sets out a Core Development Strategy, or that details Land Allocations and detailed proposals for specific areas, which will include housing and employment uses, is an important point.

- The community are being asked to comment on the Neighbourhood Plan, without having sight of a finalised Local Plan and Core Strategy.
- Until these plans are finalised, we should not allow any developments on Green Belt land.
- The absence of BDMC's Local Plan has meant some developers are trying to exploit housing opportunities which exist within the Green Belt.

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Submission Neighbourhood Development Plan	X	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

2. To which part of the document does your comment relate?

Whole document		Section	1.15	Policy	
Page Number	8	Appendix			

3. Do you wish to? Please place an 'X' in one box only

Support		Object	X	Make an observation	
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4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

The Neighbourhood Plan is to cover until 2030. It has been suggested that a significant number of homes could be built on Green Belt land and the Green Belt will be reviewed.

It's also important for BMDC and the Parish Council to take into consideration other reports requested and prepared for BMDC by their appointed local architect. An example of this is the report done for BMDC relating to the potential development of land at Sun Lane and Ilkley Road (Manor Park Bends), Burley in Wharfedale. The report is summarised at the end with:

“Having assessed all of the relevant submitted information, we believe that the proposed development does not comply with either of these CBMDC policies and that it would adversely affect the distinctive and sensitive existing landscape character of the Wharfedale area.”

(Source: copy of BMDC architect's report located at <http://brag.addins4webplus.co.uk/projects/update-on-the-land-adjacent-to-sun-lane/> shared by Burley Residents Action Group.)

As Green Belt and preserving “field patterns, tree cover and “the wider context of moorland, river and woodland” (part of Policy BW2) are important to the community, it is worth acknowledging in the Neighbourhood Plan that other sources of relevant documents exist and will be taken into consideration by the Parish Council.

I understand that Burley Residents Action Group have requested details of all Brown and Green Field sites within the Bradford district. However, they have been told that BMDC can't supply this information, which is rather concerning. I also understand the Housing Minister has halted the Core Strategy document, pending further investigation. It is therefore worth noting in the Neighbourhood Plan that it will be important for the Parish Council and the Burley community to have sight of a list/diagram of both Brown and Green Field development sites that lie within the entire Bradford district. This should be included as an appendix to the Neighbourhood Plan.

Once we have the listing of Brown and Green Field sites across the whole of the district, the Council need to justify any subsequent Green Belt development, and to provide evidence that these homes are

required in that location (as opposed to building on Brown and Green Field sites elsewhere in the district).

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Consultation Statement		Other (please specify)	

2. To which part of the document does your comment relate?

Whole document		Section	1.20	Policy	
Page Number	12	Appendix			

3. Do you wish to? Please place an 'X' in one box only

Support		Object		Make an observation	X
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4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

This section recognises a community concern that there should be:

- “No large-scale developments which would distort the existing balance of existing life”

The slight problem with this is that one person’s view of “large-scale” and another’s may be slightly different. I may say anything over about 40 houses/apartments is “large-scale”, someone else may not. Certainly, many people would class the potential 300/500+ homes on Sun Lane/Ilkley Road (Manor Park Bends) as a large-scale development.

Somewhere within the Neighbourhood Plan it is worth trying to give some guidance on what’s classed as large-scale, preferably in consultation with the community.

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Consultation Statement		Other (please specify)	

2. To which part of the document does your comment relate?

Whole document		Section	3.11	Policy	
Page Number	20	Appendix			

3. Do you wish to? Please place an 'X' in one box only

Support		Object		Make an observation	X
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4. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

As the Core Strategy has not yet been approved, it needs to be made clear in this section that the 700 is still to be confirmed.

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Consultation Statement		Other (please specify)	

2. To which part of the document does your comment relate?

Whole document		Section		Policy	BW2
Page Number	30	Appendix			

3. Do you wish to? Please place an 'X' in one box only

Support		Object	X	Make an observation	
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Policy BW3 is an important part of the plan. It needs an additional point which says that it will not only comply with national/local policies but will also take consideration of community views/preferences.

Policy BW3 relates to land outside of the existing settlement area and within the Green Belt and is of key importance to the community. There are current planning proposals for a significant number of the new (potential) 700 homes to be constructed on Green Belt land, which is not popular within the community.

BMDC need to take account of and reflect local views (as outlined in the draft Neighbourhood Plan and relevant recent/subsequent planning application objections) when publishing the new Land Allocation document on specific sites. The community have expressed views on the SHLAA sites it would like to see developed in preference to others (see Appendix 1 – Analysis of Questionnaires, Section Two – Building Development). The community is reliant on Burley Parish Council to influence the range of sites prior to publication, in line with this. It is also reliant on the Parish Council to reflect local views when reviewing planning applications.

Para 4.24, and Para. 4.25 of the Neighbourhood Plan states as follows:

“4.24 The main issues raised by local people during the consultation were:

- the need for new homes to be spread over several sites, not in one big estate-type development; and
- the lack of affordable homes to buy or rent.
- provision for a growing percentage of elderly residents

4.25 The vision for Burley is to ensure that the village continues to feel focussed around a village centre and avoids sprawl along the main commuter routes to Menston, Otley or Ilkley. This means that new housing should be well integrated into the village, avoiding a single large development that is perceived as a separate place. This will ensure that residents in the new homes feel integrated with the existing community. Dispersing new housing development across a range of sites will help to ensure that these sites are of a size that avoids dominating the local area.”

I'm very much in support of the views expressed in 4.24 (page 37).

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Submission Neighbourhood Development Plan	<input type="checkbox"/>	Basic Conditions Statement	<input type="checkbox"/>
Consultation Statement	<input type="checkbox"/>	Other (please specify)	Strategic Environment Assessment (SEA)

2. To which part of the document does your comment relate?

Whole document	<input type="checkbox"/>	Section	4.3 Table 1 (pg 12); 5.4 Table 2 (pg 17)	Policy	<input type="checkbox"/>
Page Number	12 & 17	Appendix	<input type="checkbox"/>		

3. Do you wish to? Please place an 'X' in one box only

Support	<input type="checkbox"/>	Object	<input checked="" type="checkbox"/>	Make an observation	<input type="checkbox"/>
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The Strategic Environment Assessment (SEA) states that there will be no impact upon Waste Management.

Section 3 in Table 1, in particular, is incorrect in that there is no reference in the Neighbourhood Plan or SEA to implications for Waste Management by further developments in/around the village, including the addition of a potential 700 new homes.

We have already seen instances of increased flooding and drainage problems as development has taken place. It has been notable in the centre of the village (as well as elsewhere). For example, in the last year or two there have been instances of poor drainage during heavy rainfall that have led to high levels of water flowing down Station Road, leading to flooding around the Red Lion. It necessitated them knocking a hole in the wall, which then caused Long Meadows to flood – the first time in the 20 years since that road was built. (I understand that contributing factors to this flooding problem included the removal of trees and drainage areas due to developments at Scalebor Park and Moor Lane, and poor gutter/drain clearing maintenance).

Another cause for concern re waste management would be any developments on/near the Green Belt area on Ilkley Road. This Green Belt area has always been an overflow (crossing/closing Ilkley Road) for the River Wharfe. If there was any development on this Green Belt area, how might any flooding from the River Wharfe be impacted and how would waste management keep the area and Ilkley Road accessible?

(We also get flooding on the A660, within the Parish Boundary, between Burley and Otley, and the A65 Bradford Road, between Burley and Menston. This suggests waste management drainage on all these roads can't handle it.)

Another member of the village has spoken to Yorkshire Water, who advised that the sewers between Burley In Wharfedale and it's Effluent Treatment Plant are at capacity. This therefore invalidates the

existing Waste Management assessment provided. The SEA and Neighbourhood Plan should acknowledge that further investigation and assessment is required.

In addition, BMDC and the Parish Council should make it a contractual requirement of any developments that expansion to waste management capacity is funded in total, or most part, by developers, working with Yorkshire Water.

5. Please place an 'X' in the box if you would like to be notified whether the plan proposal is made (adopted) by the Council or not:

X

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Date:

15/07/2017

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