

Mr [REDACTED] Baldwin

[REDACTED]
Ilkley

[REDACTED]
LS29 [REDACTED]

February 18th 2014

Re: Comment on the Bradford Local Plan- housing allocation for Ilkley

Dear Sir,

The Bradford Local Plan Core Strategy proposes 800 new homes for Ilkley. The reasoning behind this allocation is unsound, and does not take account of the constraints on further development of Ilkley.

Overall estimate of housing need is unconvincing

The total number of proposed houses for Bradford district has been recently revised downwards by 7.5%, and is based on assumptions for economic growth and population growth that remain very uncertain. There is evidence of overcrowding in Bradford, however this will not be solved by building houses in Ilkley where it is very hard to build affordable homes due to the market conditions maintaining high house prices. The Core Strategy mentions the contribution of reducing under-occupation and empty homes, which is desirable but not quantified. It was reported in 2011 that 13,720 houses lie empty across the district, a significant proportion of the total 2030 target. With encouragement to under-occupiers to downsize, and renovation of empty housing, it should be feasible to meet much of the anticipated need for *homes*, without building anything like the suggested number of *new houses* across the district.

Impact on habitats is still unknown

The latest draft reduced the number of houses for Ilkley from 1300 to 800 on the basis of reducing impact on the South Pennine moors (SC8). Given that most of Ilkley lies within zone Bi, it seems unlikely that it is possible to add 800 houses in this zone without creating an adverse impact.

Ilkley is not suitable as a Principal Town

Ilkley is very different from the other designated Principal Towns Keighley and Bingley. Though Ilkley has some industry/commerce, the opportunities for further job creation appear very limited, compared with Keighley. Firstly, there is little space to site new employment without building on the Green Belt or facing constraints of the flood plain or habitat impacts. Also, it is unlikely that further companies will base themselves in Ilkley, even if sited on current Green Belt, especially due to the congestion on the A65. Keighley, Shipley and Bradford remain the most practical locations for employment growth in the district as they have more space for development and better travel links. In fact, Ilkley does not fit well as Local Growth Centre either, due to development constraints.

Ilkley housing proposals conflict with Core Strategy priority to reduce need to travel

As potential for further job creation in Ilkley is limited, new housing would be bought by commuters working in Bradford or Leeds. The A65 is already overcapacity, as is the train service. A further growth in commuting would overwhelm both the road and rail links from the town. On the other hand, much of the actual expected job creation within Ilkley is low paid service sector (Tesco, care homes), and low paid workers are unlikely to afford homes in Ilkley, so commute in from other areas thus adding further to transport pressures.

Also, an increase in population will further exacerbate congestion and parking problems within Ilkley, also with extra pressure from new housing in Addingham for shopping or commuting via Ilkley train station. Ilkley is currently a human-sized town – it is just feasible for most people, including schoolchildren, to walk to the town centre from the edge of the town. Additional estates built on the Green Belt would be beyond this practical walking limit for most people, many Ilkley roads are unfortunately ill suited to cycling, and bus use remains unpopular for the majority. So we can expect even more car use and congestion on local roads and the A65, as a result of expanding the town boundary.

Pressure on schools, health services and other community facilities

Ilkley schools are already over-subscribed. A further 800 houses suggests 1 or even 2 more primary schools and a significant expansion of Ilkley Grammar School. The potential sites identified in the SHLAA are sufficient only for the housing. Where could we build extra schools? The same question applies to GP surgeries, shops and other services required by the additional population. With all available PDLs allocated for housing, extra services infrastructure could only be built by further development on the Green Belt, or on land within the town boundary currently used for amenity, leisure or commercial purposes – clearly in conflict with other priorities of the Core Strategy. It is ironic, that we recently saw the previous Ilkley Middle School site redeveloped for 30 houses.

Build on brownfield sites rather than on the Green Belt

Though the Core Strategy envisages some building on the Green Belt around Ilkley - this is unacceptable. In fact it appears to conflict with the NPPF policy 87-89 and the supposed requirements for 800 homes in Ilkley are not “exceptional”, considering all the points made above. I am opposed to development of the Green Belt particularly due to the loss of agricultural land, which is vital for the future food security of the UK as the global population continues to increase and to reduce agricultural pressures on natural habitats worldwide. Building on the Green Belt around Ilkley also increases the risk for ribbon development and merging of communities along Wharfedale, and reducing the attractiveness of the town, particularly as a tourist destination – with a potential impact on the tourist economy of the area.

The emphasis for housing development in Bradford District should instead be on brownfield sites, close to the major centres of employment in Bradford, Keighley, Shipley etc. Private developers are not keen to use brownfield sites, but the idea of subsidising them to develop housing is not attractive, we should not be funding the private profits of developers with public funds. Instead, Bradford Council and housing associations should facilitate the development of social and affordable housing on these sites, to address the real housing needs of the district’s population.

As for Ilkley, further housing development should be within the current town boundary. As far as possible, we should find ways to build affordable housing within Ilkley, to better accommodate the low paid that work in Ilkley. The SHLAA suggests a maximum of ~150 homes on PDL within Ilkley’s current boundary, though there also is scope for obtaining this amount of additional housing stock through windfall alone, e.g. conversion of larger properties to flats. Even with this moderate level of housing development within Ilkley, careful and imaginative planning would be required to mitigate the resulting pressure on local services and transport links. It would be sensible to allocate the available PDL sites within Ilkley for extra service infrastructure that is required, even just to accommodate the existing pressures and requirements of potential windfall development.

Yours sincerely,

