

From: [REDACTED] avery [REDACTED]
Sent: 24 February 2014 20:50
To: LDF Consultation
Subject: ben rhydding/ilkley development plan

i strongly oppose these plans for the following reasons

Ben Rhydding Green Belt Protection Group

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Responding To The Bradford District Local Plan

Bradford's Core Strategy – the overarching local plan document - will be subject to examination by a government inspector later this year. To be considered during the examination, comments have to be made and lodged with the Council by **5pm 31 March 2014**, irrespective of any previous representations you may have made.

The Council have published a specific form on which they would prefer representations to be made. You can download the form here: [Comment Form](#), complete it on screen and e-mail it to the Council at ldf.consultations@bradford.gov.uk Alternatively you can print it, complete it manually and post it to the address shown on the Council's guidance notes. [These can be found here.](#)

The best chance of getting the plan rewritten for Wharfedale is to challenge whether or not it is considered sound, and these are the criteria on which its soundness will be judged:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities, and
- **Consistent** with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the framework

Any comments you make should therefore set out to challenge the plan on one or more of the criteria above in order to demonstrate why you feel it is unsound. Comments should focus on the overall plan as far as it affects Ilkley and Wharfedale, not on any more localised features such as potential individual sites for building. The Core Strategy does not address individual sites - this will come later – and comments about particular sites will be ignored by the Inspector.

Some issues to consider in challenging the plan's soundness are as follows. The section and

paragraph numbers refer to the several documents which make up the Core Strategy which you can see here: [Core Strategy Publication](#)

Ilkley has been designated a “principal town” alongside Keighley and Bingley

(Section 3, para 6, policy SC4) yet:

- Its population is less than 3% of the Bradford District total
- It is one-third the size of Keighley
- It is not an employment centre, more of a commuter centre (Section 2, para 52)
- It sits on the edge of the District
- Most administrative council services have been removed, there’s no hospital or emergency medical facilities, bus services to Bradford have been withdrawn. Indeed, you will see that the plan documents are available for study at Ilkley Town Hall “By appointment only – Tuesdays”

800 new homes are planned for Ilkley over the life of the plan

(Section 5.3, para 64, policy HO3)

- There has been no attempt to assess local need
- The strategy sets out positive measures for minimising green belt releases, valuing green infrastructures, protecting habitats (Section 3 paras 103 – 116 policy SC8), minimising additional travel arising from development, boosting tourism all of which are at odds with the scale of building proposed
- Housing numbers have been reduced on account of a Habitats Regulations Assessment (HRA), but only by 38% in Ilkley whereas the combined reduction across the rest of Wharfedale is 56%
- The whole of Ilkley comes within the 2.5km habitats protection zone designated under the HRA (Section 3 para 106)
- It is unclear from the strategy therefore how the figure of 800 was calculated
- No account is taken of Ilkley’s fairly unique house building profile and the fact that there’s an ongoing process of re-development of large individual property sites and this has lead to a windfall of around 500 new homes since 2004 (such “windfalls” are excluded from any calculations)

More than 25% of the District’s new homes will be built on green belt and for Ilkley this will be at least 55%

yet the [National Planning Policy Framework](#) says that:

- “the government attaches great importance to green belts” (NPPF para 79)
- four of the specific purposes are “to prevent towns 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” (NPPF para 80)
- “once established, green belt boundaries should only be altered in exceptional circumstances” (NPPF para 83)

The strategy maintains that the building of 1600 new homes in Ilkley , Addingham, Burley in Wharfedale and Menston is sustainable

Yet the National Planning Policy Framework characterises sustainable development as being development that meets the needs of the present without compromising the ability of future

generations to meet their own needs, central to the economic success of the country and the core principle underpinning planning. Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future.

Section 3, para 15.3 of the Core Strategy states that it is vital that there is sufficient infrastructure (e.g. transport, schools, healthcare) to support the plan

However, the Local Infrastructure Plan (LIP) dated October 2013 makes scant provision for infrastructure improvements in Wharfedale. So:

For example, is our road network (the A65 basically) capable of sustaining such a level of development when

- Leeds Council is also planning to build 2300 new homes in Aireborough, also served by the A65?
- Two studies in recent years have concluded the A65 is congested and there are very limited opportunities to increase highway capacity, the route through the centre of Ilkley being a huge hurdle?
- Despite this the LIP does not propose any investment?
- Studies have also suggested that each new home leads to an extra 8 vehicle journeys per day and yet a key aim of integrated land use and transport planning is to reduce the need to travel (Section 5.2 para 13)?
- Measures are being encouraged to increase tourism/visitor numbers to Ilkley?

For example, will the town be able to sustain the parking requirements of increased numbers of residents, commuters and visitors when

- Parking is already inadequate for commuters needing day long parking?
- Land is scarce?

For example, is the rail network capable of sustaining the extra commuters when

- It is already experiencing overcrowding on peak trains?
- The LIP recognises the need for additional rolling stock but admits there is no committed funding for this?
- There seems little scope for increasing capacity in train length (short platforms) or in frequency (congestion at Leeds station and single track working on parts of Leeds and Bradford lines)?

For example, how will our schools sustain the increased demands when

- Bradford District Education Organisation Plan shows that primary schools in the Wharfe valley are presently over-subscribed and will continue to be so until 2017 which is as far as the Education Plan goes?
- The need to increase the capacity of Ilkley Grammar School has long been recognised by the council, and in fact an earlier earmarked site in Ben Rhydding is now a potential site for new homes?
- The LIP recognises that the shortage of school places “could pose significant challenge to delivering growth” (LIP para 5.5.1) yet has no proposals to alleviate the situation?
- The extra demand will surely lead to schooling solutions outside the Wharfedale catchment area with extra car/bus usage and attendant impacts on environment?

For example, will the plans for new homes be sustainable for Ilkley's tourism and leisure interests and aims when

- Several tracts of green belt have been replaced by buildings?
- Extra traffic and parking problems will deter visitors?
- The town and its surrounds will lose its unique nature, its separateness and overall attractiveness?

Overall, do you feel that Bradford's housing allocations for Ilkley and Wharfedale represent the needs and priorities of its community as envisaged in National Planning Policy Framework para 155

- "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those in neighbourhood plans that have been made"?

For example, do you feel the plan's proposals sufficiently recognise that Wharfedale is distinct from the rest of the district given that

- the District's population growth is 50% higher than Ilkley's
- Ilkley's median age is 47 years compared with 34 years for the District
- jobs are elsewhere, typically Leeds but also Bradford
- house prices average £340,000 compared with £140,000 in the rest of District
- there is very little derelict land for brownfield development, most of that taken up by delayed Tesco plans
- Bradford is ranked as the 2nd most deprived area in Yorkshire and Humberside yet Ilkley, Ben Rhydding and Burley in Wharfedale are among the least deprived areas in the country (Section 2 para 33)
- The moor, which separates the valley from the rest of the conurbation, and proximity to the Yorkshire Dales National Park and Nidderdale Area of Outstanding Natural Beauty, create a unique environment that would be compromised by the scale of the proposed development. (Section 5.2 para62 policy HO3)

The above are examples of issues that could potentially be used to challenge the plan's soundness. You may disagree with some. There may, indeed, be others not listed here. The key in making a response is to develop and personalise any issues you feel are particularly appropriate. These will have much more impact than any obvious cutting and pasting.

The council suggest you complete a separate form for each "representation" you wish to make. This may be more manageable if you aim to bundle up your comments and concerns, such as separate representations for green belt policy impacts, for infrastructure impacts, for the justification of the overall housing numbers.

WE RECOGNISE THAT THE COUNCIL'S SOURCE DOCUMENTS ARE VOLUMINOUS AND THE REPRESENTATIONS PROCESS IS FAR FROM STRAIGHTFORWARD BUT WE DO URGE YOU TO PERSEVERE. WE ARE HAPPY TO ASSIST IN ANY WAY WE ARE ABLE SO IF YOU HAVE QUESTIONS PLEASE E-MAIL THE GROUP – contact@benrhydding.org

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