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Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title		Mr
First Name		[REDACTED]
Last Name		Varley
Job Title (where relevant)		Group secretary
Organisation (where relevant)	Ben Rhydding Green Belt Protection Group	
Address Line 1		[REDACTED]
Line 2		[REDACTED]
Line 3		Ilkley
Line 4		West Yorks
Post Code		LS29 [REDACTED]
Telephone Number		[REDACTED]
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: 22 nd March 2014

Personal Details & Data Protection Act 1998

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	A) section 3 B) section 4 C) section 5	Paragraph	A) paras 60, 68-70 B) para 3 C) para 3.64	Policy	A) SC4 B) WD1 C) C) H03
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	□
4 (3). Complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible. If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

REPRESENTATION 1 – ILKLEY'S DESIGNATION AS A PRINCIPAL TOWN

1. We believe that Ilkley's status as a principal town has not been justified and it is this status that is clearly driving the housing projections (section 3.68 of the Core Strategy). Ilkley has just 1.9% of Bradford's total population and Keighley, by comparison, has 10.7%. It is at the edge of the District, has no significant employment history (hence the lack of derelict land), nor are there plans for changing this, its population largely commutes to distant cities and its infrastructure presents significant challenges. Its true status is illustrated by the withdrawal of most Council administrative services from the town as well as a direct bus service to Bradford. There is no functioning hospital and no emergency medical service. All of this contrasts sharply with the situation in Airedale, where the other two principal towns are located. The disparities between the designated principal towns are illustrated by the following extracts from the Core Strategy
 - **Strategic pattern of development** – a) Airedale (Keighley and Bingley are the principal towns): "Airedale will accommodate 8,350 (*new*) dwellings and an increase of 30Ha employment land" (section 4.2A) and b) Wharfedale (Ilkley is the principal town) will accommodate 1,600 (*new*) dwellings and approximately 5Ha employment land" (section 4.3A)
 - **Economic development** - a) Airedale: "Keighley and Bingley to be the principal focus for indigenous economic development including starter units for small and medium sized businesses, business park premises for larger digital, design and knowledge, financial and service sectors at Dalton Lane business Innovation Zone and Royd Ings" (section 4.2.C1) and b) Wharfedale: "Ilkley will have an important role as the principal town in Wharfedale with cultural, retail, tourism and leisure functions" (section 4.3C1)
 - **Transport** – a) Airedale: the proposed transport policies numbers 2-7 each offer very specific policies for improving transport links (section 4.2E) b) Wharfedale: the transport policies for Wharfedale are all rather vague by comparison (section 4.3E)
 - **Outcomes by 2030** a) Keighley – "the town has successfully retained its industrial economic base whilst establishing a reputation as a centre for research and development for manufacturing companies" (section 4.2.2); b) Bingley – "has been reborn as a distinctive market town with high quality new housing, town centre residential units and office space" (section 4.2.3) and c) Ilkley – "the town has gained a reputation in serving the needs of high quality businesses and providing jobs and a range of shops and services to meet the needs of residents and visitors alike" (section 4.3.2)
2. The above shows the huge disparity between the Airedale and Wharfedale principal towns in terms of scale, existing employment bases, forecast economic growth and differing prospects for improving transport connectivity as a means of easing the impacts of increased populations. Furthermore, Airedale is a re-generation priority area, Ilkley is not (Council's settlement study 2008).
3. **This therefore illustrates our view that Ilkley is not a true principal town; indeed, we understand it is the smallest town with such a designation in the Yorkshire and Humberside region.**
4. Closely linked to this, we maintain the plan is unjustified with regard to the volume of new homes (800) projected for the town of Ilkley, the number of course influenced by the principal town status. The high number seems greatly at odds with the town's characteristics

(summarised at the end of this representation) and many of the stated aims of the strategy set out in the DPD, chiefly those measures relating to green belt and green infrastructure, protection of the environment (particularly habitats) and travel and tourism management - a number of these have been highlighted and detailed separately in Representation 4.

5. It is also not clear from the DPD how exactly the figure of 800 has been arrived at; this is especially important in trying to understand why and how a requirement for 800 new homes, predominantly on green belt, could be considered justifiable.
6. Equally, there are justification issues around the welcome downward adjustments to the original housing projections made in the wake of the Habitats Regulations Assessment; whilst the other Wharfedale settlements (Addingham, Burley-in-Wharfedale and Menston) have seen a combined downward adjustment of 56%, Ilkley's adjustment was only 38% when it lies completely within the protection zone and, in parts, abuts the boundaries of the Special Protection Area. Surely the level of downward adjustment should be related to the range of the protection area and applied consistently across all settlements.
7. Similar anomalies are apparent when making comparisons with the settlement of Baildon which is of broadly comparable population size. The DPD states that an allocation based solely on the population size of settlements would suggest 1,194 new homes for Ilkley and 1,351 for Baildon (section 5.3.61-5.3.63). When moderating these baseline projections a number of factors have been taken into account (sections 5.3.30- 5.3.57) such as;
 - Land supply ie the nature of the supply and the split between greenfield and brownfield
 - Growth study ie a general assessment of the environment, social and economic characteristics of each settlement; a broad and strategic review of the role and importance of greenbelt around each settlement
 - Habitats Regulations Assessment findings
 - Maximising previously developed land/minimising green belt releases
8. These moderating factors should strongly impact upon Ilkley's allocation just as for Baildon, yet Baildon's allocation is moderated down by 66% to 450 new homes whereas Ilkley's reduction, as mentioned above, is down by 38% to 800 new homes.
9. **We therefore consider that neither Ilkley's principal town status nor the projected volume of new homes has been justified and, as a result, the Core Strategy is unsound.**

ILKLEY – A SUMMARY OF ITS KEY CHARACTERISTICS

- Limited employment traditions (mainly retail, tourism, sole traders and small enterprises)
- The opportunities for significant new employment are almost non-existent on account of space, topography and transport infrastructure
- Residents, therefore, typically travel to Leeds (17 miles away) and, to a lesser degree, Bradford (a 14-mile journey) – Ilkley, thus, acting as a small commuter town

- Ilkley, within the Bradford District, has the lowest natural population growth, the lowest growth as a result of international migration and the lowest expectation of future growth
- It has some of the highest land values in the country, whereas much of the rest of the District has below average land values
- Ilkley's infrastructure is operating at full capacity - the road network, in particular, is, heavily congested and this will be seriously exacerbated by the planned housing developments along the A65 corridor (including those by Leeds MDC) and there being no means to by-pass the town centre
- Schools and medical facilities are also at full stretch, new developments will create yet more land demand for expanding the provision
- The town has a unique character, and its heritage, festival programmes and surrounding beauty make it a huge leisure and tourist attraction, both for regionally-based visitors and those from much further afield (eg Tour de France 2014)
- As well as the renowned Ilkley Moor, the town has a strong visual connection with both the Yorkshire Dales National Park higher up the Wharfedale valley and the Nidderdale Area of Outstanding Beauty across the river
- Because Ilkley is sandwiched between protected moorland to the south and the Nidderdale AONB (which in any event is outside the Bradford District boundary) to the north, development on the scale proposed would lead to even more elongation of the settlement and result in ribbon development, to the great detriment of the town's approaches on the A65
- All of the town and its surrounds fall within South Pennine Moors special protection and conservation areas
- The River Wharfe cuts through the town and the lower reaches of the valley are prone to flooding
- Its residents greatly value Ilkley's separateness and its distinct sense of 'place', a value prized similarly by the neighbouring village communities of Addingham, Burley-in-Wharfedale and Menston along the Wharfedale valley.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For the reasons stated in the foregoing comments, we believe the town's true status is that of a **Local Service Centre**.

We also believe that the calculations supporting the downward adjustments to the baseline housing allocations should be made clear.

Further, in a situation when it is the Habitats Regulations Assessment which has largely influenced the level of moderation, we see no reason why the adjustments should not be applied consistently across settlements, especially so when the impacts for Ilkley are even more pronounced than neighbouring settlements.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

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7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Ben Rhydding Green Belt Protection Group has been in existence for over two years and through its close liaison with other local groups, meetings with residents and the many visits to and opinions left on its website has developed a good understanding of Ilkley's needs and concerns. We would therefore like the opportunity to share a platform with the Ilkley Civic Society in presenting our views to any hearing.

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

[Redacted Signature]

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	A) section 3 B) section 5.3	Paragraph	A) para 101 B) paras 29-37	Policy	A) SC7 B) HO2 C) NPPF sect. 9, paras 79-80, 83
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	<input type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes		No	

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REPRESENTATION 2 – NON-COMPLIANCE WITH NPPF GREEN BELT POLICY

1. The Core Strategy DPD and the latest SHLAA report state that:
 - The Council estimates green belt releases of land for around 11,000 dwellings will be needed to meet the housing need of the District (section 5.3.30) – **this means that over 25% of the District's total requirement of 42,100 will be from green belt releases**
 - The latest SHLAA report (SHLAA2 May 2013) indicates that for Ilkley there are 22 sites considered to be deliverable or developable and that the potential yield is 1636 homes, 1278 of these are from green belt sites - **thus, against the plan's proposal of 800 new homes in Ilkley a maximum of 358 would be from non-green belt sites, leaving a minimum of 55% to be met from green belt sites.**
2. Over and above this, there is a requirement to provide 5 hectares of employment land which will further exacerbate the pressures on green belt. Indeed, the Sustainability Appraisal report acknowledges these sensitivities by stating that "consideration should be given as to whether a specific green belt release should be identified in the Core Strategy in relation to the proposal for high quality employment land in Ilkley" (Table NTS 3).
3. Given the very specific measures prescribed in the NPPF paragraphs in box 3 above, we find it impossible to deduce that for the District, and certainly for Ilkley, the percentage of green belt releases is either logical or reasonable.
4. Specifically, as far as Ilkley and the policy examples in NPPF para 80 are concerned:
 - Any release on the eastern and/or western boundaries of the town will facilitate, rather than prevent, the merging of Ilkley with the neighbouring settlements of Addingham and Burley in Wharfedale
 - Green belt releases elsewhere will invariably impact upon the area's acknowledged landscape beauty, its distinctiveness and would involve sites even closer to South Pennines Moor SPA boundaries
 - Ilkley is a historic town, eg site of Roman fort and the Manor House museum, yet nowhere in the Core Strategy is it identified as such. Any green belt releases will compromise its setting and special character
 - Due to its lack of any significant employment history, as mentioned in Representation 1, there is little derelict land in Ilkley, and there is insufficient commitment in the plan to utilise all brownfield land in the District before releasing green belt.
5. There are frequent references to development in the green belt "in sustainable locations". We contend that the test of sustainability cannot be applied piecemeal to individual locations. It must recognise the characteristics of the whole settlement, and the needs of its stakeholders. In any event, development in the green belt on the scales suggested cannot, by definition, be sustainable. The green belt settings in and around Ilkley are what makes it so distinctive and attractive both to residents and visitors alike.
6. The existing green belt boundaries clearly define the edges of the settlement and were characterised by the Planning Inspector in his report on the RUDP as being "robust".
7. Although the Core Strategy acknowledges the NPPF position on green belt, it fails to elaborate how the resultant proposals are consistent with that position. Our concerns are compounded by the absence at this stage of the Land Allocations DPD. We fear, given the point made in para 4, bullet 4 above and the strict tests of "viability and deliverability" of brownfield sites being applied by developers nowadays, that this will lead to far greater subsequent pressures on green belt releases than those being deduced, as in

paras 1 and 2 above, from our examination of the Core Strategy DPD and the supporting SHLAA2 document.

8. Para 83 of the NPPF states that existing green belt boundaries may only be redrawn where exceptional circumstances exist, and that development within the green belt may take place only if the exceptions in para 89 apply. We contend that there are no exceptional circumstances or para 89 exceptions applicable. We also note that in a written statement to parliament on 6 March 2014, Planning Minister Nick Boles MP re-affirmed the NPPF position, and went on to state that unmet housing need is unlikely to outweigh harm to the green belt.
9. Bradford Council have stated that they prefer not to release green belt but must do so to meet housing need. The Minister's statement clearly removes that obligation.
10. The proposed green belt release around Ilkley is 30 percentage points higher than that for the rest of the District, despite its greater landscape value, complementing as it does the adjoining Nidderdale AONB.
11. **We therefore maintain that the proposals for green belt releases do not comply with the policy described in the NPPF and the Core Strategy is therefore unsound.**

6. **Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).**

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We believe that if the principles set out in section 9 of the NPPF are to be genuinely upheld, there needs to be a much closer consideration given to the huge imbalance between green belt and brownfield sites within the town. This imbalance should act as the steer as to the maximum amount of housing to be projected for Ilkley if the use of green belt is to remain truly exceptional as clearly envisaged in the NPPF and, indeed, if the Council's own policies on minimising green belt use are to be adhered to.

We propose that the number of homes allocated to Ilkley over the Plan period should be in the order of 400. This is achievable without any green belt land take, based on the SHLAA2 (May 2013) total of 350 units from previously developed land and green field sites plus the windfall which has largely satisfied Ilkley's housing requirements over the past ten years and which we note from the Minister's statement is now permitted to be included.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Ben Rhydding Green Belt Protection Group has been in existence for over two years and through its close liaison with other local groups, meetings with residents and the many visits and opinions left on its website has developed a good understanding of Ilkley's needs and concerns. We would therefore like the opportunity to share a platform with the Ilkley Civic Society in presenting our views to any hearing.

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

[Redacted Signature]

Date:

22nd March 2014

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	A) App 8 B) Sustainability Appraisal report	Paragraph	A) list of SA objectives	Policy	A) SO3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	<input type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes		No	

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible. If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

REPRESENTATION 3 – NON-COMPLIANCE WITH SUSTAINABLE DEVELOPMENT POLICY

1. The Sustainability Appraisal report (para 1.3 of the non-technical summary) which supports the Bradford Core Strategy Publication Draft states that sustainable development is commonly defined as “ensuring there is a better quality of life for everyone, now and in the future”. The Core Strategy DPD states that development on the scale proposed for Ilkley will be sustainable. We disagree.
2. We suggest that the needs of the present are not being fully met, and that development on the proposed scale will worsen the situation unless accompanied by serious investment in several key aspects of the local infrastructure; investment that, of itself, will doubtless require more land. The Core Strategy DPD makes generally vague references to such investment, with no robust commitment to its delivery (policy WD2).
3. Specifically, but not exclusively;
4. **Roads** - the only major road serving Ilkley (the A65) is already heavily congested to the extent that it impacts the quality of life both for residents and those visiting or travelling through the town. This has been recognised in two separate studies, one from Steer Davies Gleave for Bradford MDC, the other from Met Engineering for Wharfedale Aireborough Review Development (WARD). Bradford Council’s plans for a combined total of 1600 new homes in Ilkley and the neighbouring settlements of Addingham, Burley-in-Wharfedale and Menston, plus 2300 new homes in Aireborough proposed by Leeds Council, which all feed in to the A65 artery, would markedly exacerbate the congestion problems. Yet the Core Strategy suggests that “Ilkley benefits from **excellent rail and road connectivity**”(section 4.3, Wharfedale Sub Area Policy 1 C2).
5. Furthermore, the studies confirmed there is very limited scope for highway capacity improvement or bus priorities along the A65 corridor. The major A65 bottle neck is in Ilkley itself and options for highways capacity improvements are severely limited, and construction of a bypass is ruled out by the physical constraints of a very narrow valley and, naturally, the huge investment required. The Strategy accepts that transport is fundamental in enabling settlements to function (section 3.68) and that bus use has been declining in recent years (section 5.2.7) so how therefore how will all of these problems be overcome?
6. Ironically, when so much emphasis is being rightly afforded to the protection of the local South Pennines Moors SPA habitats, the congestion on the A65 regularly leads to a rat-run of traffic along the higher, and broadly parallel, Moors Road route which runs alongside the SPA edge – such use of this narrow, unclassified route will undoubtedly increase and further impact upon protected habitats.
7. **Parking** – is already inadequate to meet present needs. The Council recognises this with a couple of DPD policies, namely a) “a progressive reduction in long stay parking in town centres and other highly accessible locations (other than at railway stations to serve rail users and other locations serving a park and ride function) and transfer some parking spaces to short stay, subject to consideration of possible implications for traffic congestion” (section 5.2.27, Parking Policy B) and b) “Provision of rail and bus based park and ride facilities” (section 5.2.27, Parking policy D).
8. But, while the intention to comply with parking standards is stressed, the provision of adequate numbers of spaces is not made, nor is it apparent where the land might become available. Without it, the proposed modal shift to public transport will surely be compromised with commuters being unable to park close to rail/bus terminals (the prevailing wisdom being that commuters are generally unwilling to walk further than around 400 metres to public transport) and the inevitable consequence being that many will opt to travel by car adding to congestion.
9. **Rail** – the Strategy acknowledges “a significant number of Bradford’s higher earners are commuting from Airedale, Wharfedale and Ilkley to jobs outside the District, mainly in Leeds (section 2. 52).” Overcrowding on the Wharfedale line is already acute at peak times and there is little scope for increasing capacity in train length (short station platforms) or in frequency (congestion at Leeds station

and single track working on parts of the routes to both Leeds and Bradford).

10. **Education** – the Bradford District Education Organisation Plan, which extends to 2017, shows that primary schools in the Wharfe valley are presently over-subscribed and will continue to be so at least until 2017 when the current education plan expires. As far as secondary education is concerned, the need to increase the capacity of Ilkley Grammar School has long been recognised by the Council as has the relocation to an alternative site being the only viable means of achieving the required increase. However, funding is not available and the site previously identified is now included in the Strategic Housing Land Availability Assessment as a potential site for housing. Transport of pupils to alternative facilities outside of Wharfedale may well be a short term, if very unpopular, solution but hardly effective in meeting the needs of the community in the longer term. And, as many such journeys would be made by private car, and otherwise by bus, there would be an adverse environmental impact.
11. **Tourism and leisure** - Ilkley is an important tourist destination and a historic town, a significant portion of which is designated as conservation area. Its annual festival programme is a strong feature of its attractiveness. The town's setting and the landscape's unique and renowned beauty are highly valued, sandwiched as it is between the South Pennines Moors Special Protection Area/Special Area of Conservation to the south and the Nidderdale Area of Outstanding Natural Beauty to the north. The Core Strategy, understandably, seeks to protect and enhance Ilkley's role as a tourist and leisure attraction (see Tourism aims referred to in representation 4). We believe, however, that the loss of green belt on the scale envisaged in Representation 2 will have a deleterious effect on the town's attractiveness to visitors. When coupled with the increased traffic congestion, as highlighted above, visitors will be presented with frustrating delays accessing the town by road as well as then locating a place to park. The impacts on the Core Strategy's tourism and leisure aims are surely therefore unsustainable.
12. **Habitats** – Ilkley is wholly within the 2.5km protection zone described in the Habitats Regulations Assessment report due to its close proximity to the South Pennines Moor SPA. This was recognised by a specific Sustainability Appraisal objective (Objective 5) agreed with the Council, this being "to conserve and enhance the internationally, nationally and locally valued wildlife species and habitats". However, the conclusion reached in the SA report was that "it cannot be concluded with certainty that development would not lead to impacts via a) loss of supporting habitats (*NB green belt releases*) ; b) increased emissions to air from road traffic (*NB road infrastructure issues as above*); and c) recreational impacts (*NB Ilkley Moor is a renowned tourist/visitor attraction*)" – section 8.2.1, page 109.
13. In tandem with the sustainability concerns above, the Sustainability Appraisal report concludes by "suggesting a number of ways to mitigate the adverse effects of the strategy and maximise the beneficial effects" of the Core Strategy. A number of these relate to the policies for Wharfedale, such as "the appropriateness of development given the landscape character of the sub-area"; "a number of transport projects whose development could have environmental impacts"; impacts on South Pennines SPA; and "to recognise that there is no high frequency bus service to Ilkley" (Table NTS 3).
14. **Our view, and one which seems to be supported by the Sustainability Appraisal findings, is that the Core Strategy does not demonstrate that development on the scale proposed is sustainable and therefore the plan is unsound.**

6. **Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).**

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We would suggest there needs to be a clear commitment to heeding the mitigation measures set out in the Sustainability Appraisal Report and ensuring the necessary infrastructure is in place prior to significant housing or employment development taking place.

Furthermore, the importance of "ensuring that infrastructure is provided to support new development, and noting how infrastructure should be considered when assessing the suitability of sites" was re-stated in the written statement to parliament by the Planning Minister 6 March 2014 and this underpins our concerns above.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

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<input type="checkbox"/>
<input checked="" type="checkbox"/>

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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Date: 22nd March 2014

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	<input type="text"/>	Paragraph	<input type="text"/>	Policy	SC1-9, WD1-2, EC1-5, TR1-8, HO1-12, EN1-8
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4 (2). Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible. If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

REPRESENTATION 4 – A HELICOPTER VIEWPOINT

1. This representation builds on the themes of the three preceding, inter-connected representations relating to Ilkley's principal town categorisation and the Strategy's compliance with NPPF green belt and sustainability policies. It focuses on a helicopter view of the Strategy as a whole and a "sense check" on the overall impact that the full suite of Core Strategy policies (44 of these listed in box 3 above) will have on Ilkley.
2. The vast majority of the policies, grouped within separate themes, are clearly laudable and can be readily supported, particularly when viewed in isolation or within their respective themed groupings. Doubtless, there has been a mapping exercise to gauge the collective effects of the policies in terms of the District as a whole. However, our overall analysis of the full suite of policies in relation to the characteristics of the Ilkley settlement alone lead us to question the veracity of an allocation of 800 new homes.
3. In other words, we believe that if all of the aims and policies meticulously described in the Core Strategy are to be adhered to, it is inconceivable that Ilkley's allocation of 800 new homes would have been delivered. Simply put, it is not achievable, something has to give. This leads us to question how "joined-up" the process has been. **As such, we maintain that the plan is ineffective and therefore unsound.**
4. To illustrate how we have arrived at this conclusion, we have listed below a wide mix of the very positive aims and policies described in the Strategy which are directly related to the characteristics of the town.
5. **GREEN BELT EXTRACTS – the stated aims versus the expected outcome for Ilkley**
 - Based upon the current evidence of need and land supply a selective review of the green belt is required to meet unmet needs which cannot be accommodated in non-green belt areas (section 3.102)
 - while recognising the need for development in some green field and green belt locations, (the strategy) still has at its heart the overarching principles of making best and most efficient use of urban and previously developed land and protecting the District's best and most valued green infrastructure, spaces and habitats (section 5.3.2)
 - **Minimising** the use of green belt within the plan area (section 5.3.94, policy H07E)
 - *Our view – the adjectives used to describe the scale of green belt releases ("some", "selective" and "minimising" belie the impact for communities, particularly Ilkley. Unmet needs are no longer acceptable grounds for green belt land take as in the Planning Minister's written statement to parliament 6 March 2014.*
6. **GREEN INFRASTRUCTURE (GI) EXTRACTS – stated commitments related to Ilkley's GI**
 - Create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation (Strategic Core Policy 4, Principal towns C5)
 - It is important that valuable habitats and open spaces are retained within settlements..... (section 3.84)
 - The NPPF supports an approach which recognises the multiple benefits that open land can provide, particularly in relation to habitats for wildlife and opportunities for recreation.....Natural England supports the view that Green Infrastructure (GI) should take account of the landscape context, hinterland and setting..... (section 3.88)

- Bradford's approach to GI needs to reflect the value that GI can add to the quality of the District for residents, visitors and businesses (section 3.89)
- The river corridors of the Aire and Wharfe and the South Pennine Moors are identified as strategic green infrastructure assets due to the opportunities offered to enhance the living landscape as a resource for people and wildlife and to address future needs for flood alleviation, water management, carbon capture and recreation (section 3.93, Strategic Core Policy 6B)
- At District level, GI is considered to be land which already contributes towards the following..... important attributes of natural green space, connectivity to other green spaces and a local need for open space.....valued landscapes and local distinctiveness and amenity.....improving opportunities for walking, cycling and horse riding, establishing strategic green links and enhancing rights of way network in urban and rural parts of the District. Green spaces and corridors which can be assessed as making a significant contribution towards the above criteria will be protected (section 3.93, Strategic Core Policy 6C)
- *Our view – it is impossible to reconcile the totality of these very positive aims and policies with the scale of the likely incursions into Ilkley's green belt.*

7. ENVIRONMENTAL PROTECTION (HABITATS) EXTRACTS – the measures prescribed to protect Ilkley's habitats

- Facilitating the management and expansion, where appropriate, of vulnerable habitat types, primarily blanket bog and woodland and supporting action plans for habitats and species at risk (section 3.32, Strategic Core Policy 2-A3)
-rural villages and Pennine moorland are significant assets. The protection and enhancement of these areas have played a part in Bradford's transformation.....Sensitive rural landscapes such as the South Pennine Moors have been protected and enhanced. (section 3.9, Spatial Vision)
- Protect and enhance the District's environmental resources including areas of international and national importance, such as the South Pennine Moors, the character and qualities of the District's heritage, landscape and countryside and maximise the contribution they can make to the delivery of wider economic and social objectives (section 3.18, Strategic Core Policy 1 - B7)
- The NPPF recognises the importance of the Habitat Regulations by stating in para 119 that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined (**section 3.104**)
- It is recommended adjusting the rate, scale and spatial distribution of development in order to achieve a position where adverse impacts on the South Pennine Moors SAC and SPA were capable of being avoided, managed and mitigated (section 3.107)
- Development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the South Pennine Moors Special Protection Area and Special Area of Conservation. To ensure these sites are not harmed a number of zones have been identified - **Zone A** no development involving a net increase in dwellings would be permitted within a suitable buffer area around the upland heath/South Pennine Moors (normally 400 metres) unless, as an exception, the form of residential development would not have an adverse effect upon the site's (sic) integrity and – **Zone B1** (400m-2.5km) within this zone the Council will take a precautionary approach to the review and identification of potential Greenfield sites for development based on an assessment of carrying capacity using available evidence from bird and habitat surveys and appropriate additional monitoring (section 3.112, Strategic Core Policy 8).
- In relation to zone B1, the review of literature relating to the behaviour of SPA typical bird species,

presented in the HRA report, suggests that many species travel as far as 2.5km from the SPA boundary to forage.....Within this zone, the report recommends that new development must avoid direct (eg land take) and indirect (eg increased disturbance) impacts on supporting habitats. This has led to a re-assessment of the distribution of development within this zone to avoid potential adverse impacts, particularly direct land-take..... (section 3.115)

- In circumstances where a need for local green belt releases has been identified and where a proportion of land adjoining the settlement lies within the 2.5km zone, The HRA report recommends that areas of land will need to be identified that feature neither high numbers of birds nor good quality habitats (section 3.116)
- Any development that would be likely to have a significant effect on a European sitewill be subject to an assessment under the HR at project application stage. If it cannot be ascertained that there will be no adverse effects on site integrity then the project will have to be refused (**Policy EN2 A**)
- *Our view – the planned housing requirement for Ilkley has been moderated down to 800 and employment land down to 5Ha, largely as a result of the Habitats Regulations Assessment and the town's proximity to protected areas. However, it is difficult to understand, given the policies above, the still high building projection when the whole of Ilkley is within the 2.5km protection zone and, in parts, actually abuts the SPA boundaries.*

8. ENVIRONMENTAL PROTECTION (LANDSCAPE, HERITAGE, FLOODING) EXTRACTS – the stated measures to protect Ilkley's broader environment

- Local green space which is a valued for amenity, recreation and wildlife or contributes towards character, distinctiveness and visual quality will be protected from development, other than in very special circumstances which are supported by the local community (section 5.4.17, Policy EN1 D)
- Biodiversity, landscape and heritage assets define the character and setting of the District's principal towns. Identifying potential for growth will be informed by the existing scale of the investment, the contribution made by environmental assets and the importance of these assets and flood risk issues (section 3.60, Strategic Core Policy 4, Principal towns, C)
- Working with partner organisations and local communities to appraise, reduce and manage all sources of flooding (section 3.32, Strategic Core Policy 2 - A2)
- The following criteria will also be used to assess whether change can be considered acceptable 1) the potential for adverse landscape and/or visual effects; 2) the importance of cultural associations, historic elements in the landscape and the setting of settlements (section 5.4.98, Policy EN4 B)
- Safeguard potential to increase flood storage provision and improve defences within the Rivers Aire and Wharfe corridors (section 5.4.148, Policy EN7 -A4)
- Seek to minimise run-off from new development: for green field sites run-off should be no greater than the existing green field overall rates (section 5.4.148, Policy EN7 A8)
- *Our view – again, these very positive policies seem to be out of kilter with the proposed allocations for Ilkley.*

9. TOURISM AND LEISURE EXTRACTS – the stated aims to protect and enhance tourism

- The countryside of the District is one of its greatest assets..... (section 2.60)
- The District also benefits from a thriving tourism economy which the Strategy will help support..... (section 5.1.2)

- Addressing the opportunities and pressures that an increasing population has on the District's land resource, particularly in key locations for tourism and recreation (section 3.32, Strategic Core Policy 2 – A4)
-tourism industry is underachieving in terms of volume of both day and staying visitors. The key challenge is to lift the appeal and quality of some attractions and encourage people to make more visits locally. The District's attraction to the wider international visitors however is very promising (section 2.67)
-along with the spa town of Ilkley and Haworth have been strengthened as tourist destinations, whilst supporting the needs of their resident communities and protecting and enhancing what makes these places so special (section 3.10, Spatial Vision)
- Continued unbalanced development will threaten the future quality of life and competitiveness of the District – with overheating of already successful areas (through congestion and reduced environmental quality) (section 3.26)
- Areas of tourist, cultural and heritage significance should not be adversely affected by the impact of transport, in particular additional trips arising from development (section 5.2.39, Transport and tourism policy A)
- *Our view – similarly, these are good policies but it seems there has been minimal regard to the effect that the significant green belt losses and increased traffic congestion will have on the town's continuing attractiveness to visitors.*

10. TRAVEL AND PARKING EXTRACTS – stated aims to manage traffic increases to bring about a modal shift in travel arrangements

- a significant number of Bradford's high earners, for example commuting from Airedale, Wharfedale and Ilkley to jobs outside the District, mainly in Leeds (section 2.52)
-the sensitive location of development in accessible sustainable locations, thereby reducing the need to travel by car, reducing the District's ecological footprint.....(section 3.12)
- Transport is fundamental in enabling settlements to function (section 3.68)
- Support the role of Ilkley town centre as a location for a mix of retail, leisure and office development, on an appropriate scale, benefitting from **excellent rail and road connectivity** (section 4.3, Wharfedale Sub Area Policy 1 C2)
- Bus use has been declining in recent years (section 5.2.7)
- increases in congestion from future road traffic growth if increases in car use and road freight are not managed through appropriate policies and interventions (section 5.2.9)
- Providing development in optimum locations which aim to reduce the number and length of car and freight journeys (section 5.2.10)
- A progressive reduction in long stay parking in town centres and other highly accessible locations (other than at railway stations to serve rail users and at other locations serving a park and ride function) and transfer some parking spaces to short stay, subject to consideration of possible implications for traffic congestion (section 5.2.27, Parking policy B)
- Provision of rail and bus based park and ride facilities.... (section 5.2.27, Parking policy D)
- *Our view – several factors militate against the success of these aims and policies eg the majority of the town's earners commute to Leeds/Bradford; they need long stay car parking, but this is not available and likely to be squeezed, there are no obvious facilities to provide for park and ride; there*

is a misconception that Ilkley's road network is "excellent"; there is no direct bus service to Bradford, let alone a frequent one; and the measures being taken to increase visitor flows into the town plus, of course, the effects that Bradford and Leeds' housing plans along the A65 corridor will have on the number of residents using the limited routes.

6. **Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).**

You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As stated earlier, our view is that there are many positive policy commitments in the Core Strategy across a number of different themes. Delivering developments within such a framework would be of tangible benefit to communities. Clearly there needs to be development in Ilkley as elsewhere.

Our sole concern is that for Ilkley the Core Strategy policies could only be complied with if the housing allocation is drastically reduced. We believe that a more appropriate and achievable target is in the order of 400 which is attainable without any green belt land take.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Ben Rhydding Green Belt Protection Group has been in existence for over two years and through its close liaison with other local groups, meetings with residents and the many visits and opinions left on its website has developed a good understanding of Ilkley's needs and concerns. We would therefore like the opportunity to share a platform with the Ilkley Civic Society in presenting our views to any hearing.

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature: 	Date: 22 nd March 2014
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Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

