

## Core Strategy Development Plan Document

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

### Publication Draft - Representation Form

Monday 17<sup>th</sup> February until Monday 31<sup>st</sup> March 2014

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This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:  
[www.bradford.gov.uk/ldf](http://www.bradford.gov.uk/ldf).

For further information you can contact the Local Plan Group by:

- **Emailing us at:** [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- **Phoning us on:** (01274) 433679

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Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- **Part A** – Personal Details
- **Part B** – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- **Part C** – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

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Please return this completed representation form to the Local Plan Group by either:

- **E-mail to:** [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,  
2<sup>nd</sup> Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

**For your representation to be 'duly made' the Council must  
receive it no later than 5pm on Monday 31<sup>st</sup> March 2014**

For Office Use only:			
Date			
Ref			

## 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 Ms
First Name		
Last Name		May Kidman
Job Title (where relevant)		President Chair
Organisation (where relevant)	Ilkley Civic Society	
Address Line 1		
Line 2		
Line 3		Ilkley
Line 4		
Post Code		LS29 LS29
Telephone Number		
Email Address		
Signature:		Date: 17 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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Date			
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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	4.3	Paragraph		Policy	SC9,SC4,HO7,SC5,TR1,HO3 SC3,SC6,SC7,TR2,HO3,HO1
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	X
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.**

The Local Plan in Section 4.3 designates Wharfedale as a sub-area but in the application of its policies, which in many cases have much to commend them, fails to recognise the characteristics of the valley that distinguish it from the rest of the District. In particular in applying Policies SC9, SC4, HO7, SC5, TR1, SC3, SC6, SC7 to Wharfedale the Core Strategy fails to acknowledge the nature of the locality and the communities within it leading to results that often contradict the intention of the policies themselves. Indeed if the policies were correctly applied to Wharfedale proposals for the valley would be very different.

Consequently, the Local Plan as it applies to Wharfedale is unsound for the following reasons

- The top-down approach of the Core Strategy contradicts Policy SC9 and the principles of National Planning Policy Framework.
- The Settlement Hierarchy Policy SC4 in the designation of Ilkley as a Principal Town cannot be justified by the evidence available.
- The justification of the housing allocations in Policy HO7 that rely on the Settlement Hierarchy is based on inadequate evidence.
- The scale of the proposed development in Wharfedale have cross-border implications that are not congruent with Policy SC3.
- Inadequate consideration is given to the infrastructure implications, particularly in relation to transport, Policy TR1 and TR2, and education.
- The proposed deletions from the Green Belt do not take into account local circumstances and contradict Policies SC6 and SC7 and the intentions of the NPPF.
- Contrary to the intentions of the Plan the proposals for Wharfedale do not promote sustainable development

## 1. Top-down approach

The proposals for Wharfedale directly contradict "Strategic Core Policy SC9: Making Great Places

A. Planning decisions as well as plans, development proposals and investment decisions should contribute to creating high quality places, and attractive, cohesive, sustainable settlements through:

1. Understanding the place and wider context, and taking opportunities to improve areas and make them as good as they can be.
2. Being place specific by responding to the District's distinctive features and character, and being appropriate to the local context."

Wharfedale, "avoided the full impact of the Industrial Revolution, and still retains much of its rural and agricultural character. The green infrastructure in Wharfedale is distinctive as it has more extensive areas of woodland and tree cover than many other parts of the district. The area also has a strong visual connection with the adjoining Yorkshire Dales National Park and despite substantial residential expansion, all the four main settlements have retained their distinct local identity and separation from each other. (Local Infrastructure Plan, Working Draft 9.2.6 Green Infrastructure, Open Space and Public Space)

The proposals, as applied to Wharfedale, do not show an understanding of the place or its wider context, as described by the Council in the above, will not improve the area, do not respond to the distinctive features and character of the valley, and are not appropriate to the local context, all in direct contradiction of Policy SC9.

Policy WD1 is itself contradictory, between sections A and B, which outline the proposed development of the valley, and section D, which is concerned to protect the environment. The scale of development proposed, 1,600 houses, 5 hectares of employment land and new community facilities including schools, cannot be accommodated without compromising the environment of the valley.

The Core Strategy also contradicts Paragraph 1 of the introduction to the National Planning Policy Framework which states that the guidance, "provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities." The top-down approach adopted by the Core Strategy fails to recognise the character of Wharfedale and will not allow the communities in the valley to produce plans that reflect their needs and priorities.

**The proposals for Wharfedale do not support Policy SC9 and conflict with the spirit of the National Policy Planning Framework**

## 2. Settlement Hierarchy

Policy SC4 classifies Keighley, Ilkley and Bingley as Principal Towns to be the focus of local development and services. In classifying Ilkley as a Principal Town it follows the Regional Spatial Strategy that has since been revoked. It is claimed in Para 3.58 that "the Core Strategy has taken the opportunity to use the information contained within Bradford's own settlement study..... to make some adjustments to the core RSS approach," but reference to the Council's Settlement Study (January 2008) and the Update reveals the marked differences between Keighley and Ilkley. The Council's own evidence shows that classifying them within the same category cannot be justified.

According to the Settlement Study, Keighley had a population of 44,300, over three times that of Ilkley with 13,400. The 2001 Census for the three Keighley Wards, an area slightly larger than that considered in the Settlement Study, gave a combined population of 46,918 which had risen by 2011 to 51,551 while the Ilkley Ward, rose from 13,730 to 14,809. The two settlements are of a completely different scale.

The Settlement Study also noted that Keighley has a strong industrial focus (Settlement Study Update 4.3.8) and a large employment base with over 110 businesses employing over 10 people. Ilkley had only 30 such

businesses. The largest companies in Keighley employ between 200 and 300 people each (Settlement Study Update para 4.3.16) but in Ilkley only one employs as many as 90. Whereas 57% of the population of Ilkley travelled over 5km to work, predominantly in Leeds, over 62% in Keighley worked within 5km of the town centre.

The towns are also located in different surroundings. The Core Strategy acknowledges that Wharfedale and Airedale are separate subareas. Airedale provides a key location for employment, reflected in the proposal to include Bingley as a Principal Town. The rationale for including Bingley as a Principal town, which has a strong employment base, (Settlement Study Update 4.1.4) "so that this town's role in providing homes, jobs, services and cultural activities to the area and its importance within the Airedale Strategy's regeneration proposals." (Core Strategy para 3.59) emphasises the differences between the two settlements. Ilkley is not a major employment centre nor in an area expected to play a key role in attracting economic investment or in a regeneration priority area.

It should also be noted that Bingley has 6 primary schools and 3 secondary schools while Ilkley has only 4 primary and one secondary school (Settlement Study Update Tables 62 and 41)

The Settlement Study and the Core Strategy itself clearly show that the towns are very different economically and socially, Keighley is a relatively large industrial town while Ilkley is a small commuting and tourist town. "Ilkley is a hotspot for a range of tourism activities and if this were to be managed in a sensitive but proactive manner then there may be opportunities for further growth in this sector." (Settlement Study Update 4.2.30)

Recent Council Policies that have removed most Council services from Ilkley, focussing them in Keighley or Bradford, have also undermined the pretence that Ilkley can be considered a Principal Town. The potential closure of the Manor House, one of the main tourist attractions in the town also undermines the, "sensitive but proactive manner, "needed to enhance its tourist role.

**On the evidence provided by the Council itself the classification of Ilkley as a Principal Town and its inclusion as such in Policy SC4 cannot be justified.**

### 3. Housing allocations

An analysis of Policy HO7: Housing Site Allocation Principles reveals the contradiction between these principles and their application in Wharfedale

"In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, sites will be identified, assessed, compared and allocated for housing development in the Allocations DPD, the Shipley & Canal Road Corridor AAP and the Bradford City Centre AAP based on a range of principles including:

- A. The need to allocate sufficient deliverable and developable sites to meet the targets set out in Core Strategy Policies HO1 and HO3;
- B. Prioritising the allocation of sites which would assist in the regeneration of the Plan area; **There are no such sites in Wharfedale**
- C. Maximising the use of previously developed land within the Plan area and prioritising their development via phasing policies - subject to the maintenance of a range of sites which meet local need and provision of a 5 year supply of deliverable sites; **The SHLAA shows that the majority of sites in Wharfedale are Greenfield with little previously developed land**
- D. Prioritising the allocation of sites which would remedy identified deficiencies in local infrastructure and services including open space, community and education facilities; **Further housing development in Wharfedale is unlikely to remedy deficiencies and more likely to place greater pressure on already stretched infrastructure**
- E. Minimising the use of green belt land within the Plan area; **The majority of sites identified in the SHLAA in Wharfedale are in the Green Belt in direct contradiction to this principle**

F. Maximising positive environmental benefits of development by prioritising the allocation of sustainably located sites which:

1. Would result in significant environmental improvements to an area for example by reclaiming derelict land; **Development in Wharfedale would have the opposite effect and damage the environment**
2. Would enhance biodiversity or contribute to the aim of achieving no net loss of biodiversity; **Development in the Green Belt would lead to the loss of biodiversity**
3. Would provide opportunities to draw energy supply from decentralised and renewable / low carbon sources;
4. Would provide opportunities to create or enhance green infrastructure particularly those that link urban green spaces with the wider countryside. **Development would compromise the existing green infrastructure**

G. Minimising adverse environmental impacts of housing growth, in particular with regard to climate change, biodiversity and flood risk, by wherever possible:

1. Selecting sites accessible to a range of services and community facilities thereby reducing the need to travel; **Development in Wharfedale would most probably lead to an increase in travel demand notably in commuting to Leeds**
2. Selecting sites accessible to quality public transport services and in accordance with the public transport accessibility approach as set out in Policy SC5, Policy TR1 and Appendix 3; **Public transport services in Wharfedale, particularly the rail link to Leeds is already congested at peak times and further development would worsen the problem**
3. Avoiding development of sites which would result in the fragmentation or isolation of natural habitats; **The Habitat Assessment shows that Wharfedale links two important areas of natural habitat, development would fragment them**
4. Ensuring that sites relate well to the form and character of the settlement and do not detract from its landscape setting; **Development in Wharfedale would not relate to the form an character of the settlements and would detract from the landscape setting**
5. Minimising the loss of trees and woodland;
6. Avoiding sites or locations which would pose unacceptable risk to health and safety;
7. Applying a flood risk sequential approach to direct development to areas of lowest flood risk. **Much of one of the large sites identified in the SHLAA is within the flood plain**

**Applying these principles to Wharfedale underlines the housing allocation in Tables HO5 and HO7.**

In the case of Ilkley the settlement hierarchy provides an important starting point for the allocation of new development. Principal Towns, as the Core Strategy states (para 3.68), "will be a main focus for the provision of new housing and will provide an important focal point for services, facilities and employment." Given that on the evidence contained in the Settlement Study Ilkley cannot be considered to be a Principal Town the rationale for focussing new housing in the town no longer holds.

The initial allocation Baseline Distribution of Housing Requirement Based Solely on Population Table HO3 suggests that Ilkley's allocation of 1,194 should be slightly lower than Baildon's of 1,351. Yet in Tables HO5 and 7 after an assessment that it is claimed included, "A general assessment of the environmental, social and economic characteristics of each settlement;" and, "A broad and strategic review of the role and importance of the green belt around each settlement," Ilkley, as a Principal Town is allocated 800 new dwellings and Baildon only 450. Para 5.3.62 notes that the reduction in the Ilkley allocation," reflects the redistribution of development away from the areas most sensitive due to their proximity to the designated North Pennine Moors SPA / SAC," but fails to show how this level of development can be justified in the light of this constraint. Any assessment that truly "considered the characteristics" of Ilkley and the "importance of the green belt" in the Wharfe Valley could not conclude that this scale of development, mainly in the green belt, is justified.

Describing Ilkley in 2030 para 4.3.2 states that, "the town has seen housing growth to meet the needs of local

residents," but there is no indication of the level of this need. The figure of 800 dwellings as a top down allocation unrelated to local need contradicts this statement. The Bradford 2010 Strategic Housing Market Assessment Table 3.2 shows that Wharfedale has the highest percentage in the District of households moving in to the area from Leeds (15.9%) and elsewhere in England (7%) suggesting that local need is significantly lower.

The same table shows that Wharfedale does not provide for households moving out of Bradford. Only 2.5% of households moving into Wharfedale came from the four City subareas, in sharp contrast to the 22.6% in Bingley and Shipley and 16.4% in Keighley and the Worth Valley. Development in Wharfedale is unlikely to contribute to the authority's housing need, but rather to increase it by attracting migrants from outside the District.

Wharfedale and Ilkley, in particular, form a distinct housing sub-market as Figure HO1 Bradford SHMA Sub Areas, derived from the Bradford 2010 Strategic Housing Market Assessment, recognises. The mean house price in Ilkley in 2012 was £340,000, more twice the £140,000 mean for the district as a whole and the mean private rent £775 per month compared to £500. Council Tax Band data confirms the distinct nature of the housing stock 64% being in Bands D-H whereas in the District as a whole 64% falls in Bands A and B. (Ilkley Ward Profile, Bradford Observatory) These differences help to explain why Wharfedale does not, as noted above, attract households from the four City subareas, and is therefore unlikely to contribute to the housing targets for the District.

The 2001 Census records 6,046 dwelling in Ilkley, of which 5,736 were occupied. The Bradford Observatory notes that in the second quarter of 2013 there were 6,790 dwellings, 6,427 of which were occupied. This suggests that over 700 new dwellings had been built in Ilkley in a period of 12 years. This relates quite closely to an analysis of planning applications for new dwellings that have been approved during period 2004-2013.

## WINDFALL SITES 2004-2013

Year	Applications approved
2004	153
2005	146
2006	134
2007	37
2008	38
2009	60
2010	26
2011	65
2012	83
2013	60

## Ilkley Civic Society research

These figures, which are derived from the register of planning applications, do not represent what has actually been built, as they include resubmissions and new plans for the same site, but they do give an indication of the level of building in Ilkley in recent years. Many of these applications will have involved the intensification of sites within the town, the Green Belt having restricted any development on the edge of the settlement. The SHLAA Draft Report (October 2011) para 13.3 confirms that, "the contribution of windfalls to the delivery of housing is expected to continue," and the very nature of significant parts of Ilkley with large houses in large gardens suggests that this process it is likely to remain important in the town. That new dwellings continued to be built in Ilkley even during the economic downturn is confirmed by the Final GVA Bradford District Housing Requirements Study Report figure 4.2 which notes an increase in the housing stock in the Ilkley Ward of 88 between April 2008 and April 2012.

It has been shown in Section 2 above that the classification of Ilkley as a Principal Town is unjustified, and it will be argued below that the importance of the Green Belt in the Wharfe Valley is such that it should be amended only in exceptional circumstances in accordance with the National Planning Policy Framework and hence that

**the proposal for 800 new dwellings in Ilkley and 1,600 in Wharfedale is unjustified**

#### **4. Cross-border issues**

The National Planning Framework, paragraph 178, notes that, "Public bodies have a duty to cooperate on planning issues that cross administrative boundaries," and in particular, "travel-to-work areas." (para 180). The Ilkley-Leeds Corridor is clearly a case in point. It is well known that Ilkley and Wharfedale as a whole are major commuting areas to the main cities of West Yorkshire and Leeds in particular.

"People living in wards along Wharfedale (Craven, Ilkley, Rombalds....), are most likely to commute outside the district to work. Nearly a third of the commuting trips out of Bradford are made by people living in these wards. Over 40% of employed people living in Rombalds commute outside Bradford.

Leeds is a significant destination for out-commuters from all wards, however the wards along Wharfedale, .....have the highest proportion of residents commuting to Leeds. Over 70% of the trips from Rombalds and Ilkley to outside the District are to Leeds." (Core Strategy Evidence Base- Base Analysis Report 4.4.3 Bradford Employment Land Review and Forecast)

The Leeds Core Strategy Publication Draft 2012 proposals that have been accepted by the Inspector at the Examination in Public include

- 2,300 new dwellings in Aireborough ( Guiseley, Yeadon and Rawdon) that will feed on to the A65 and the Wharfedale rail line at Guiseley station
- 2,000 new dwellings in the Outer North West area, mainly Otley, that will feed on to the A660, and
- 6,000 new dwellings in North Leeds that straddles both the A65 and A660 corridors

The addition of 1,600 houses to Wharfedale taken together with these developments in Leeds will place significant greater pressure on these corridors, particularly the A65 that is already recognised as at or above capacity. In doing so it gives insufficient consideration to the impact of development in the valley on the neighbouring authority.

**The Local Plan in allocating 1,600 dwellings to Wharfedale gives insufficient consideration to the cross-border implications of the proposal, as required by the National Planning Policy Framework and Policy SC3**

#### **5. Infrastructure**

Assuming an occupation rate of 2.3 per household, derived from the Bradford Observatory data for the Ilkley Ward, the additional population in the town would be 1,840 and for the 1,600 houses in Wharfedale approximately 3,680. The implications for infrastructure are considerable.

#### **Transport**

Both the Transport study undertaken for Bradford by Steer Davies Gleave and a study for WARD by Met Engineering conclude that the A65, one of the main routes into Leeds, is already congested and that further development in the corridor will only worsen the situation. In examining the implications of the preferred strategy Steer Davies Gleave concluded that:

"If nothing is done This route, already congested at peak times, will experience severe delays at junctions in Ilkley, Menston and Guiseley, impacting on journey times on the corridor.

#### **Recommendations**

7.99 We recommend cross-border working with Leeds to investigate solutions on this corridor; specifically at junctions in the Menston and Guiseley area. *Apart from limited improvements, constraints of space to the highways junctions on this corridor make it unlikely that significant extra highways capacity can be provided on this already congested corridor.*

7.100 Similarly, it will be difficult to reduce bus journey time or journey time variability, because of the



limited opportunities for providing bus priority.”

(Bradford District-Wide Transport Study in Support of the Core Strategy, Final Report, October 2010)

The more recent study for WARD confirms that:

“The A65 is simply unfit for the volume of traffic now using it on weekdays and at weekends, and any further increase in traffic will see further reductions in traffic flow speeds, higher levels of congestion and more rat-running through residential areas.” (Met Engineering quoted in Ilkley Gazette 16 August 2012)

Yet between them Bradford and Leeds are proposing to add 3,900 new dwellings to this already congested corridor.

In consequence the Transport Study recommended a focus on making best use of the existing rail services on the Wharfedale line, and specifically, encouraging modal shift to rail from car, but it has already been recognised that the rail network in Wharfedale is running at capacity. Residents in both Ilkley and Menston underlined this. (Bradford Evidence Base – Settlement Study Update October 2011) The rail connection to Bradford and Leeds may be excellent, as the Core Strategy claims, but in the case of Leeds, the main commuter destination from Wharfedale, it is already at capacity. Further housing development which leads to increasing numbers of commuters cannot be accommodated. The excellent bus link to Bradford from Ilkley claimed in the Core Strategy does not exist, the direct service was withdrawn in 2010.

Much commuting traffic from Wharfedale to Leeds uses the A660. Further pressure on the route from development in Wharfedale including the 2,000 houses proposed for the Otley area in the Leeds LDF further emphasises the need for greater cross-border cooperation and questions the practicality of the building of 1,600 houses in Wharfedale.

Wharfedale, and Ilkley in particular, has a high level of car ownership. Increasing the population of the valley by building 1,600 new houses directly contradicts the aims of Policy TR1 “The Council through planning and development decisions and transport policies will aim to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit traffic growth, reduce congestion and improve journey time reliability.” The result of these planning and development decisions is likely to be the complete opposite of the Council’s intentions, an increased demand for travel, particularly commuting to Leeds, increased traffic growth, greater congestion and longer journey times.

The Parking Policy TR2B aims to reduce long stay parking in town centres other than in the vicinity of railway stations in order to encourage the use of rail as a sustainable transport mode. Unfortunately, applying this policy to Wharfedale, though desirable in itself, could have the unintended effect of reducing the use of the railway by commuters. Parking at the stations in Ilkley, Ben Rhydding, Burley-in-Wharfedale, Menston and Guiseley (in Leeds) is limited, with little opportunity of expansion, and observation of the streets in the vicinity of these stations, particularly Ilkley, reveals an increasing area used by commuters to park all day. Provision of park and ride facilities in line with Policy TR2D may be desirable but, given land values in the valley, is unlikely to be financially viable and is only possible in one location.

**The scale of development proposed for Wharfedale is in direct contradiction of Policies TR1 and TR2**

## Education

It is clear from the Bradford District Education Organisation Plan (page 33) that the Primary Schools in the Wharfe Valley are already oversubscribed and are likely to remain so.

### Primary School Planning Areas

	Capacity	2013	2014	2015	2016	2017
Wharfe Valley	2346	2373	2449	2446	2406	2388

Secondary provision is also under pressure "Ilkley Grammar School is reportedly at or nearing its capacity "(Settlement Study Update 4.2.29) and the school confirms it is oversubscribed receiving 350 applications for 245 places in Year 7 (IGS Website accessed 12.3.14)

It is also evident that past forecasts have tended to underestimate the need for places in the valley. (Bradford District Education Organisation Plan (page34)

	Forecast 2012-13	Actual 2012-13	Difference	
Wharfe Valley	2261	2307	46	2.0%

The Bradford District Education Organisation Plan notes that the authority has a duty to ensure sufficient places are available for pupils in the District and among the options to meet this requirement it lists

- "increasing numbers on existing school sites wherever possible and providing additional accommodation as necessary
- increasing the size of existing schools by providing additional accommodation on new sites
- promoting new schools i.e. Free Schools, Academies, Studio Schools"

Given that there appears to be some spare capacity in the Three Valleys area, of which Ilkley is considered part, that there is little room for expansion of Ilkley Grammar School on its present site, and that finance is unlikely to be available for it to be rebuilt on another site, the potential exists for any further children of secondary age being forced to travel out of the Wharfe Valley. Anecdotal evidence suggests that this may already be the case. A plan that increases this possibility does not reflect the needs and priorities of the community as the National Planning Policy Framework requires.

Traditionally children from both Addingham and Burley have attended Ilkley Grammar School while many children in Menston have been accommodated in schools in Leeds. The extra development proposed by Leeds in Guiseley means that this arrangement may not continue while that proposed by Bradford in Menston, Burley and Addingham, in addition to that in Ilkley is likely to lead to a severe shortage of school places, particularly at secondary level, in the valley. A plan that does not provide a sufficiently clear indication of how these issues might be resolved is clearly unsound in relation to the evidence available.

## 6. Green Belt

Strategic Core Policy 7 (SC7): Green Belt A. in accord with the NPPF states, "The Green Belt in the District has a valuable role,..... keeping settlements separate, and the concentration of development, as well as conserving countryside." In direct contradiction of this policy the Strategy then proposes significant deletions from the Green Belt in Wharfedale, that have the potential to join up Menston and Burley and significantly reduce the gap between Burley and Ilkley.

This conflicts with the NPPF which states, "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence." (NPF para 79 ) Among the purposes of the Green Belt are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment; (NPF para 80)

The Green Belt in the Wharfe Valley has been crucial in preventing the spread of the conurbation into land on the edge of the Yorkshire Dales National Park and Nidderdale AONB and maintaining the distinct character of the settlements in the valley. The importance of the Green Belt in Wharfedale has been recognised by the inspectors at the public inquiries into the 1985 Local Plan and the UDP.

“The eastern approach to Ilkley is along the valley bottom following the meandering river. After Burley the area is rural in character. When travelling towards the town the steep slopes rising to the Moors on the southern side and the gentler slopes rising to the Nidderdale AONB in the north gradually come into view. Although there are more urban features along this section of the road along the A65 to the west of Ilkley the sporadic nature of development does not seriously impair the rural character of the area.”

“the deletion of such a substantial area (the area to the east of Ilkley identified in the SHLAA) would significantly erode the land between Ilkley and Burley and.....development would have a marked adverse effect on the appearance of the area.” (Bradford UDP – Inspector’s Report Volume 5 K5.56 and 57)

The proposed deletion from the Green Belt of land to the east of Ilkley together with that between Burley and Menston and between Menston and Guiseley in Leeds, would threaten to create a continuous urban sprawl from the conurbation to Ilkley and in doing so contradict the spirit of National Planning Policy Framework and Policy SC7.

Although the Core Strategy does not allocate land to specific uses it is worth noting in respect of the proposal for 5 hectares of employment land in Ilkley that the Inspector at the UDP concluded that commercial development, “would be very much out of keeping with the present appearance,” of “the Jewel in Bradford’s Crown.”

Para 5.3.62 notes in relation to the housing allocation that, “the Bingley target has been set below both the baseline number and below the total capacity within the SHLAA. This is because the majority of the SHLAA capacity for Bingley is within the green belt and although Bingley is a sustainable location for growth there is also a need to ensure that the strategic functioning of the green belt in the area is not compromised.” Taking into account the views of Inspectors’ in earlier Planning Inquires it is difficult to understand why such conclusions are not also applied to Ilkley where the majority of the SHLAA capacity is also within the green belt and it is equally important to ensure that the strategic functioning of the green belt in the valley is not compromised.

The Green Belt in Wharfedale is an important part of the Green Infrastructure of the District as defined by Strategic Core Policy 6 (SC6): Green Infrastructure C which states

“Green Infrastructure is considered to be land which already contributes towards, or has the potential to contribute towards the following:

1. Retention, creation and enhancement of important habitats and ecological networks
2. Resilience to climate change and sustainable design
3. Important attributes of natural greenspace, connectivity to other greenspaces and a local need for open space
4. Valued landscapes and local distinctiveness and amenity,.....

Deletions from the Green Belt and the allocation of 1600 dwellings in the valley, at this stage of the Local Plan process will inevitably compromise the ability of the valley to support these aims.

The proposed six Green Belt deletions in Wharfedale also contradict policy that seeks to “Protect and enhance the biodiversity and landscape character of Wharfedale.

**The proposals for deletion from the Green Belt in Wharfedale are unsound as they contradict the principles of National Planning Policy Framework and Policies SC6c SC7, and fail to recognise the unique nature of the valley**

## 7. Sustainability

The National Planning Framework states that, "Planning policies and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised," (para 34) and "To support the move to a low-carbon future, local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions." (para 95)

**The building of 1,600 houses in Wharfedale, conflicts with the National Planning Policy Framework, as it is bound to result in a significant increase in traffic and fail to reduce greenhouse gas emissions.**

**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.**

The proposals for Wharfedale need to be reconsidered. The policies SC9, SC4, HO7, SC5, TR1, SC3, SC6, SC7, TR2, HO3 and HO1 need to be applied appropriately to the subarea in recognition of its distinct characteristics.

- Policy SC4 should be amended and Ilkley designated a Local Service Centre and not a Principal Town
- The principles in Policy HO7 should be applied to the allocation of housing numbers in Wharfedale
- In accordance with Policy SC7 the importance of the Green Belt in Wharfedale should be recognised
- The infrastructure implications of proposed developments, particularly on Transport and education, need to be reconsidered
- The wider impact of the proposed housing allocations, particularly on traffic in the neighbouring authority need to be reconsidered

**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 Core Strategy fails to recognise the distinct nature of Wharfedale and does not apply its own policies to the subarea

*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:**

17.3.14

## Core Strategy Development Plan Document (DPD) : Publication Draft

### PART C: EQUALITY AND DIVERSITY MONITORING FORM

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

**Please place an 'X' in the appropriate boxes.**