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ILKLEY

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*Note: For my information the Core Strategy Publication, the Local Development Framework and the Local Plan are all meant to be the same document(s) and processes.*

Introduction and general preamble to respond to the Core Strategy Publication Draft: I have submitted (I hope!) the correct format - separately but felt compelled to write this somewhat ambling commentary too.

This is written without malice, and recognising that the UK has ratified The International Covenant on Civil and Political Rights (ICCPR) - a multilateral treaty adopted by the United Nations General Assembly on 16 December 1966, and in force

from 23 March 1976 - which has an article (19), which mandates freedom of expression.

I write of 'Ilkley', but I mean the 'wider Ilkley' - Ilkley and what has become known as Ben Rhydding, as well as Middleton (the North side of the Wharfe).

Firstly, it seems to me, to be somewhat tricky, perhaps even a little bit disingenuous, to use full time Council employees, who presumably can specialise in plans/planning and the appropriate "jargon," to write up something that the "average person" does not hope to compete against.

The Council states on its Plan

'Please respond in writing by using the Representation Form available online. The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities, such as E-mail, to make their responses in this way.'

I found this very, very difficult to do ... and I have a Tertiary degree!

An example of Jargon too: **The English Oxford Dictionary defines 'spatial' as "relating to space: the spatial distribution of population"**. I think that the "average" person thinks 'spatial' is to do with space - having spatial awareness in cricket; for example - see <http://www.thomas-s.co.uk/sport-cricket-battersea>

It also seems to me that the amount of careful reading, as well as the format for submissions too, is somewhat cleverly designed to try to put off the "average person" (in my opinion), as well as satisfy those in charge with the "professionalism" exhibited.

Another example is the document, issued by The City of Bradford Metropolitan District Council as Guidance Notes, (adapted from the Planning Inspectorate's 'Examining Local Plans Procedural Practice', December 2013). This document runs to 6 complex pages (!) - see Appendix Three.

This seems hardly democratic, *in my opinion* - that is to expect hard working people - many of who work long hours and are not used to this type of semi-legalese format/jargon - see Appendix Four. All of this is something that has to be dealt with in a "part-time, after-work" manner - and to be dealt with intelligently - again, all in my opinion.

This complexity makes one want to give up before one starts ... and the cynic in me suggests, (probably and hopefully wrongly), that this is the intention - all again, I am afraid, in my opinion!

The format of Representation is not useful either - in my view ... One has to try to bend one's mind to respond to someone else's format, rather than one's own. This is difficult to do well - as well as attempting to follow the guidelines.

**Please note: City of Bradford Metropolitan District is often abbreviated in the following as CBMDC in what follows.**

For details of the Plan in draft please go to [http://www.bradford.gov.uk/bmdc/the\\_environment/planning\\_service/local\\_development\\_framework/Core+Strategy+DPD+Publication+Draft.htm](http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/Core+Strategy+DPD+Publication+Draft.htm)

**Growth Assessment:** It also occurs or seems to me, if true, to be a bit strange that apparently *Broadway Malyan*, (a Global Architecture, Urbanism and Design Practice - with 16 worldwide studios!), was appointed to produce a Growth Assessment, (if so, at what cost to Council Tax payers I wonder?), as background for the Core Strategy Publication Draft.

See

<http://www.bradford.gov.uk/asp/bga/pdfs/Bradford%20Growth%20Assessment%20Principal%20Towns.pdf>

**Failure to understand:** It also seems to me that the CBMD has failed to understand the following about Ilkley ...

- It seems the only available land in the Ilkley ward is Green Belt land - with some few exceptions. Those that I know of seem small - such as the land bank Tesco Stores has invested in. I mean by this particularly the old, former Spooner's site.
- It seems to me, (anecdotally admittedly, now that my children are long gone from Primary & Secondary Education), that most schools are already at capacity. There are no tertiary educational facilities in Ilkley anyway - (also see comments later, under Transport).
- Dentistry and Healthcare facilities seem to be under strong pressure from demand already - it occurs to me - again, anecdotally.
- The major road (the A65) is often severely suffering from road congestion and there seems to be no plans to ameliorate this - rather the opposite - especially if I look at the planned, required discouragement of cars.
- Car parking, (for me and those folks that I know of personally anyway), is already very difficult, expensive and is - critically - for me woefully inadequate.
- It seems that there is poor public transport, relative to other areas I have experienced, and (again anecdotally) it does not seem to be able to cope at 'Peak Times'.
- Local employment opportunities seem to have always been limited, so if the Plan as structured gets the go-ahead then commuting to Leeds, Bradford and similar areas will have to increase it seems to me, and regardless of public transport - it looks like most will have to be by car -

though probably more (carbon heavy) flights will be necessary from LBA International!

- The impact on the character of Ilkley and its surroundings for visitors and tourists as well as local residents seems to me will be considerable. I would not choose Ilkley now should I move up North as I did 25+ years ago - (I moved up from Northern Kent!). I would now look towards relocating to Harrogate (a real Town!) or perhaps York, or even Ripon - a City!

**The Work Foundation:** For what it is worth, a comment or two seemingly outside the scope of the Plan but worth studying. For background see <http://www.theworkfoundation.com/Assets/Docs/Leeds%20City%20Region.pdf>

Here is one extract ...

However, there are pronounced differences within Bradford itself in terms of commuting. Places like Ilkley, Shipley or Bingley closely link into the Leeds economy and are arguably part of it, while minority ethnic communities in inner-city Bradford tend to commute only very short distances and are less well linked with Leeds. In key aspects, therefore, Bradford is interdependent with Leeds, but the potential for wider mutual economic benefit is not currently realised. Many of Bradford's skilled residents leave the city each morning to work in Leeds and, instead of Bradford firms benefiting from Leeds as a market for their products; Leeds firms tend to use Bradford as a market. One example is Leeds' retail sector, which benefits substantially from Bradford's young population.

The Work Foundation<sup>8</sup> - The above extract is from the report **City Relationships: Economic Linkages in Northern city regions - Leeds City Region November 2009**

<sup>8</sup> The Work Foundation is part of Lancaster University - an alliance that enables both organisations to further enhance their impact. Through its rigorous research programmes targeting organisations, cities, regions and economies, The Work Foundation is a leading provider of research-based analysis, knowledge exchange and policy advice in the UK and beyond.

**Sustainability:** Altogether the draft Plan does not strike me as a sustainable solution in its entirety.

I also notice that I am not alone in these concerns, as **The Ben Rhydding Green Belt Protection Group 2013** has urged residents to take action. They instance concerns over

- "Valuable Green belt being lost for ever
- Eventually Ilkley and Ben Rhydding merging with Addingham and Burley-In-Wharfedale.
- The Core Strategy mentions Bradford City Centre is a key driver accounting for 17% of all employment. Canal Road, Leeds Road and the M606 corridors are other major employment locations within the City of Bradford. Airedale provides the other key location

for employment and is a well served transport corridor connecting the settlements of Keighley, Bingley and Shipley. It does NOT mention Ilkley or the Wharfe Valley.

- The already congested A65 road become (sic) more regularly gridlocked.
- Getting a seat on a peak hour train will become - like it is in major conurbations - a luxury.
- Children of residents will have to go elsewhere for their educational needs.
- Parking is already a nightmare and will become worse
- Trying to access healthcare will become harder and harder".

They, too, recognise that the City of Bradford's District Council's source documents are "voluminous" and the representations process is far from straightforward **but they do urge people to persevere.**

**Other Factors:** As of February 12, 2014 it seems that the *Government Planning Inspectorate has approved the Leeds Council's Local Plan Core Strategy.* Leeds will now get 70,000 new homes over the next 15 years, 2,300 of them in Guiseley, Yeadon and Rawdon - not too far East, along the A65 - less than 10 miles(!) from Ilkley and so will greatly increase all of the associated problems of this A65 corridor. For reference please read later comments I make about the rail system and schools etc. - as well as the road itself.

Almost needlessly to say the new development seems to be destined to be on what is currently Green Belt.

**Plan Requirements:** As I understand it the Plan has to achieve the following: -

1. **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.
2. **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
3. **Effective** - the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities, and
4. **Consistent** with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Sadly I cannot make a comment about the latter point (4), as I have not put in the necessary work to try to understand the national policy - though see Appendix One.



My comments are to the draft Plan's inability to meet the criteria one to three.

Specifically the Plan seems not to mention neighbouring Core Strategies or Plans. See the comment about Leeds in Other Factors above. In my opinion, it does not seek widespread "Justification" - see comments about the availability locally of the draft plan - and no consultation, apart from a few public meetings that were impossible for some workers to get to easily.

As an example the Council held a number of drop-in events across the Bradford District for local residents and other interested parties to find out more about the proposed strategy and to have their say on the 'Further Engagement Draft Document' and there was one (!) - on Tuesday 29<sup>th</sup> November 2011 at the King's Hall in Ilkley between 12 noon and 7 pm! *In my opinion*, very few people would not find that time and date at all easy.

There were some Technical Consultation Events - but these were by "Invitation only".

The consultation was meant to be (and was claimed to be) addressed to members of the general public, community and voluntary organisations, statutory bodies, businesses, landowners, investors, developers, professional bodies and anyone\*\*\* with an interest in the Local Development Framework for the Bradford District. Was anything done, for example, for Organisations founded after this initial consultation? All I can write is that in my opinion not enough was done.

\*\*\*I believe I (and friends locally) all meet the criteria above and do not feel properly consulted.

**Social Role:** According to the Draft Plan's **Social Role Summary** it seems that Ilkley is a principal **town** within the Districts settlement hierarchy and quote - (my **Bold Italic highlighting**) "has a vital and viable **town\*** centre with **^potential for further expansion and redevelopment**. New housing development would help to support the existing **town** centre and create new footfall to facilitate the **town** centres (sic) expansion and redevelopment. There is identified housing need and demand within Ilkley. **There are also gaps** in primary and secondary school places and open space and recreation facilities. New housing **may provide** new and enhanced education and open space facilities. New housing would also help to support and **possibly improve** existing bus services through creating a high frequency service".

**^**In my opinion this bit seems written without experiencing Ilkley centre!

**Definition of a Town:** This aspect could be an interesting debate. Personally I think it is misleading to call Ilkley a **town\***. In England a town was traditionally was a place that had a charter to hold a market (Otley & Skipton are towns).

So called 'Market towns' were the economic hub of a surrounding area but it strikes me that it seems a lot (if not most) workers of Ilkley have employment elsewhere - especially in the so-called Economic Centres, leaving Ilkley as an "attractive commuter place to live". It does not seem to me to be an employment centre, more of a commuter centre (see Section 2, Paragraph 52)

*\*From Wiki (see <http://en.wikipedia.org/wiki/Town>) - a town is a settlement that is larger than a village but smaller than a city.*

Ilkley's population - as I understand it - seems to be less than 3% of the Bradford District's total population, (for example I believe it is one-third the population size of Keighley), though the tax revenue (in 2012-13) is much nearer 5.3%!

I believe Ilkley<sup>§</sup> is a "Successor Parish" as defined by the Local Government Act 1972 - and has an estimated population of 13,978 in 2002; (according to the Office for National Statistics in April 2001). Note also it seems that Ilkley has a mere Parish Council - not a Town Council!

<sup>§</sup> - **Successor parishes** are civil parishes with a parish council created by the Local Government Act 1972 in England. They replaced, with the same boundaries, a selected group of urban districts and municipal boroughs that were abolished in 1974. Since 1 April 1974 any parish council in England has the right to resolve to call itself a town council and many communities have taken up this right, including areas that preserved continuity with charter trustees. However, no successor parishes have exercised this right (e.g. Ilkley)

Most administrative type Council services have been removed - though the CBMDC claims that Ilkley has Town Hall\*\*!

This so called "Town Hall" seems to be open only on Tuesday 9.30am to 1.00pm by appointment only - see below.

\*\* Indeed, we are informed by CBMDC that the draft plan documents are available for study at Ilkley Town Hall "By appointment only - Tuesdays".

It is probably worth noting that CBMDC may have already recognised the Parish status of Ilkley - see [http://www.wharfedaleobserver.co.uk/news/10137933.Ilkley\\_action\\_group\\_s\\_vision\\_for\\_town\\_set\\_to\\_be\\_revealed/](http://www.wharfedaleobserver.co.uk/news/10137933.Ilkley_action_group_s_vision_for_town_set_to_be_revealed/)

Extract - *Bradford Council has already approved Ilkley Parish Council's Neighbourhood Area status application.*

**Emergency Medical Capability:** There are no Emergency Medical facilities in Ilkley. In April 2012 there were only three trained volunteers in Ilkley as Community First Responders - people who live locally and can often reach patients requiring emergency medical care within a few minutes - usually faster than an ambulance would be able to get there.

**Transport to major conurbations:** The Bus services to Bradford seem to have been withdrawn; there is just a train service. I am retired now (happily!) but used to work in Little Germany, Bradford - 5 minutes work from Forster Square Station. I went into my office at about 6:15 to get in by 6:50 - invariably by car I'm afraid - ***not environmentally friendly nor energy efficient.*** I left for home at about 17:30 to 18:30. By car it took me about an hour - the traffic is awful (about 20 minutes shorter than the train) - but in my opinion it was impossible *directly or intelligently* either way by bus!

If I always used Public Transport see what the web site "Transport Direct Info" (see <http://www.transportdirect.info/Web2/JourneyPlanning/JourneyDetails.aspx?cacheparam=3>) suggests. Not very practical for a regular commute of 20 miles or less! (The walk from my house to the rail station is 15/20 minutes). Conversely the X84 Bus Service to Leeds operates well in conjunction with the train services there.

I enquired (the day before yesterday) about a journey from my house to Leeds First Direct Arena - which is 1km walk away from Leeds Rail Station. It takes - by car - about 45 minutes - but by train about an hour and five/ten minutes. By bus it takes one and half hours - but at least it can be done direct by bus - unlike Bradford!

It is also worth noting that, in my view, Leeds is currently a more desirable place to work, with better salaries and more opportunities!). As a source of this please again read The Work Foundation's study - see <http://www.theworkfoundation.com/Assets/Docs/Leeds%20City%20Region.pdf>

**Tertiary Students needing to go to Bradford:** For information - I think it would cost a student living in Ilkley and needing to travel to get to Bradford for lectures in a morning and leaving at 08:30, or thereabouts, it would seemingly cost £980 a year! (A 16-25 Rail Card does not help - for apparently all journeys made between 4.30am and 10am Monday to Friday a minimum fare of £12 is payable. If one travels regularly before 10:00, then a weekly or monthly season ticket may be more appropriate, though one won't be able to get a Railcard discount).

**Local Needs:** (Section 5.3, paragraph 64, policy H03)

In my opinion there ...

- Has been no attempt to assess local needs.
- There seems to be a fundamental flaw in the strategy - it does not set out positive measures for minimising Green Belt changes. For example; more than 25% of the District's new homes will be built on Green Belt - and for Ilkley this will be at least 55%).



- Any possible disturbance - none noted in the Plan - does not seem to '**add any value to green issues**' - such as the protection of wildlife habitat, (Ilkley comes within the 2.5km Habitats Protection Zone - designated under the HRA - see Section 3 Paragraph 106).
- **There is not sufficient minimisation** of additional travel arising from development **nor of boosting tourism**.

(again the above contains my bold italic highlights)

All of these issues are not mitigated given the scale of new buildings being proposed as well as the inevitable - necessary - though as yet unidentified - infrastructure needed. (Please see Section 3 Paragraphs 103 - 116 Policy SC8)

- Housing numbers have been apparently being reduced on account of a '*Habitats Regulations Assessment*' - but only by just over 35% in Ilkley compared to the rest of the Wharfe Valley, that bit in the CBMDC area, where the reduction is just over 55% - but no explanation is given as yet - so it remains unclear from the strategy therefore how the figure of 800 houses was calculated. (Not very democratic?!).

Then there is the very big and pertinent issue, (probably political too, unfortunately); that for job hunters/changers with excellent jobs in Leeds, Bradford etc. (and who have quite a bit of disposable income), then Ilkley is quite attractive currently - great houses, pleasant area to bring up children, decent schools, and the Moorland etc.). I repeat an earlier comment - personally "*I would now look to Harrogate (a real Town!) or Ripon (a City!)*". It seems to me that it would be better to go to Harrogate now and let Ilkley, (and therefore Bradford), miss out on this type of relocation/move.

I can speak to this personally - though I moved here a long time back. All this explains the general prices etc., in Ilkley as well as the strong housing demand; (somewhat exhibited by the ongoing process of re-development of large individual property sites!).

By the way - again *in my opinion* - this seems to have led to a windfall of around 500 new homes - at least so since 2004 - though apparently such figures are sadly, and somewhat unfortunately, excluded from any density calculations.

**Green Belt:** 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 (see Appendix Two)* says that:

- "The Government attaches great importance to Green Belts" (NPPF Paragraph 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 Paragraph 80)
- "Once established, Green Belt boundaries should only be altered in exceptional circumstances" (NPPF Paragraph 83) - my underlining.

**Sustainability:** The strategy maintains that the building of over 1,500 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.

So, 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. Clearly this is not the case with the Plan as currently drafted.

For example Section 3, Paragraph 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 seems to make scant provision for infrastructure improvements in Wharfedale.

So - for example, is the road network, the A65 basically, capable of sustaining such a level of development? Especially when it seems

- The Leeds Council is also planning to build 2,300 new homes in Aireborough, also served by the A65 and, (thanks to Guiseley Rail Station), the rail link to Leeds/Bradford.
- Two recent studies have decided that the A65 is heavily congested with very limited opportunities to increase capacity and the route - which has to use Ilkley Centre.
- Some studies have predicted that **each new home** means to an **extra eight vehicle journeys per day** and yet a key aim of the Integrated Land Use and

the current Transport Planning plans to reduce the need to travel (See Section 5.2 Paragraph 13)!

Yet Transport seems to be such a big local topic?

In spite of all this the **Local Investment Plan** does not propose any investment to take care of this issue.

- Then there are the attempts to increase tourism to Ilkley!

In the light of all this how will the place be able to sustain the parking requirements of increased numbers of residents, commuters and visitors? Especially when

- o Parking is already inadequate - even for shoppers let alone for commuters who need day-long parking?
- o There are no plans to de-congest the A65.
- o It seems that usable land is scarce - hence the need to utilise Green Belt?

Is the rail link capable of sustaining the planned extra commuters that might occur if the Plan is put into action when

- o It seems that there is already overcrowding on peak time trains.
- o The Local Investment Plan requires more rolling stock but reluctantly points out that there is as yet committed NO funding for this?
- o Additional trains (frequency) would help but because of the current congestion at Leeds station this seems unlikely?

**How will Education fare?** Bradford District Education's *Organisation Plan* mentions that primary schools in the Wharfe Valley area are presently over-subscribed and will continue to be so until at least 2017 - as far into the future as the 'far-sighted' Education Plan goes?

Additionally one should consider -

- o The need to increase the capacity of Ilkley Grammar School - which has long been recognised by the Council, but an earlier earmarked site (in Ben Rhydding) - ironically now one of the potential sites for new homes!
- o The Local Investment Plan mentions that the shortage of school places "could pose significant challenge to delivering growth" (See Local

Investment Plan Paragraph 5.5.1) though there are no proposals to alleviate the situation.

- o If students and school kids have to be "bussed" elsewhere - outside the Wharfedale catchment area - then heaven help (in my opinion!) the people who try to use the A65. - Hardly environmentally friendly nor a Green solution!
- o On top of all of this is the Local Investment Plan sustainable for Ilkley's tourism and leisure interests and aims when
  - Several tracts of Green Belt seem to have been replaced by buildings already?
  - The extra traffic and parking problems will in my opinion deter visitors. Trust me on this - I have friends outwith the County who already dislike this aspect of Ilkley.
  - The settlement and its surroundings will lose its peculiar nature as well as overall attractiveness it strikes me.

Bradford's housing allocations for Ilkley and Wharfedale does not seem to represent the needs and priorities of the Ilkley Community as envisaged in National Planning Policy Framework Paragraph 155.

- o "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential" - or so the *National Planning Policy Framework* suggests.
- o It continues ... "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"
- o I think the Draft Plan fails in this regard too. Tragically, (in my view), the current Community Strategy (*see below*) results in a "vision" - which is just that ... a vision!
- o Quote from CBMDC - The current Community Strategy is for the period 2011-2014. To achieve the vision that: "By 2020, Bradford district will be a prosperous, creative, diverse, inclusive place where people are proud of their shared values and identity, and work together to secure this vision for future generations"

A Vision, (my background in Strategic Management for a Global Company has some influence over me I confess), in my opinion, has to have the following

- "What do we do?"
- "For whom do we do it?"
- "How do we excel?"

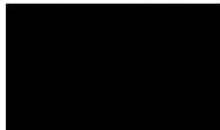
It will be noticed that Bradford's Vision has none of these factors contained within it!

**Final Remarks:** Finally the following should be considered too ... all in my opinion ...

- There appears to be very little derelict land for so-called 'Brownfield' development in the Ilkley area. Contrast this as it appears to me to be a lot more in the Bradford's Aire Valley area.
- The CBMD's population growth seems to be at least 50% higher than Ilkley's growth rate - even allowing for "Incomers"
- Apparently it seems, the median age is 47 years of age for people living in Ilkley - contrasted with 34 years of age for those in the District generally. (There must be a lot of elderly people in Ilkley - and they will need medical facilities!).
- It seems that there are fewer jobs in the area that is Ilkley. Many jobs are elsewhere, typically Leeds and Bradford.
- House prices average £340,000 cf. £140,000 in the rest of the District.
- Apparently Bradford is ranked as the 2nd most deprived area in Yorkshire and Humberside yet Ilkley and Ben Rhydding are among the least deprived areas in the country (See Section 2 Paragraph 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 may be compromised by the scale of the proposed development. (See Section 5.2 Paragraph 62 policy HO3)


The above seem to be some examples of issues that challenge the plan's soundness.

Yours sincerely,



McKenzie

M.B.A., Dip. I.I.M.

PS As some sort of disclosure - I am almost 62 years of age and have no interest in either the Ilkley itself; (I am mostly found on the Moor), and have no financial interest whatsoever in Bradford, Leeds or anywhere in the local area other than I have a pension is paid by  which has a site in Bradford.



## **Appendices**

### **Appendix One:**

7<sup>th</sup> March 2104 - A written ministerial statement by Nick Boles on local planning.

The coalition government is committed to reforming the planning system to make it simpler, clearer and easier for people to use, allowing local communities to shape where development should and should not go. Planning should not be the exclusive preserve of lawyers, developers or town hall officials.

We are also committed to ensuring that countryside and environmental protections continue to be safeguarded, and devolving power down not just to local councils, but also down to neighbourhoods and local residents.

We have already taken a series of steps to cut unnecessary red tape, such as the streamlined National Planning Policy Framework reducing 1,000 pages of planning guidance to less than 50, revoking the last administration's bureaucratic regional strategies and extending permitted development rights to make it easier to get empty and under-used buildings back into public use. I would like to update the House on progress on this ongoing work.

### **An accessible planning system**

In October 2012, we invited Lord Taylor of Goss Moor to lead a review into the reams of planning practice guidance that we have inherited from the last administration.

My department subsequently held a consultation on the group's proposals, and in August 2013, we launched our proposed streamlined planning practice guidance in draft, consolidating 7,000 pages of complex and often repetitive documents. Today, we are launching the final version of that practice guidance through an accessible website.

We have carefully considered representations made on the draft practice guidance and feedback from hon.

members and noble peers in recent Parliamentary debates.

I would particularly note that we are:

- issuing robust guidance on flood risk, making it crystal clear that councils need to consider the strict tests set out in national policy, and where these are not met, new development on flood risk sites should not be allowed
- re-affirming green Belt protection, noting that unmet housing need is unlikely to outweigh harm to the green Belt and other harm to constitute very special circumstances justifying inappropriate development
- making clear that local plans can pass the test of soundness where authorities have not been able to identify land for growth in years 11 to 15 of their local plan, which often can be the most challenging part for a local authority
- making clear that windfalls can be counted over the whole local plan period
- explaining how student housing, housing for older people and the re-use of empty homes can be included when assessing housing need
- ensuring that infrastructure is provided to support new development, and noting how infrastructure constraints should be considered when assessing suitability of sites
- stressing the importance of bringing brownfield land into use and made clear that authorities do not have to allocate sites on the basis of providing the maximum possible return for landowners and developers
- noting that councils should also be able to consider the delivery record (or lack of) of developers or landowners, including a history of unimplemented permissions; this will also serve to encourage developers to deliver on their planning permissions
- incorporating the guidance on renewable energy (including heritage and amenity) published during last summer and making it clearer in relation to solar farms, that visual impact is a particular factor for consideration
- allowing past over-supply of housing to be taken into account when assessing housing needs
- on the 5 year supply of sites, confirming that assessments are not automatically outdated by new household projections

- clarifying when councils can consider refusing permission on the grounds of prematurity in relation to draft plans
- encouraging joint working between local authorities, but clarifying that the duty to co-operate is not a duty to accept; we have considered and rejected the proposals of HM opposition to allow councils to undermine green Belt protection and dump development on their neighbours' doorstep

We will today also cancel the previous planning practice guidance documents being replaced by the new guidance; a list has been placed in the Library. The planning practice guidance will be updated as needed and users can sign up for email alerts on any changes, or view these revisions directly on the site. The online resource is at:  
[planningguidance.planningportal.gov.uk](http://planningguidance.planningportal.gov.uk)

### **Encouraging re-use of empty and under-used buildings**

In August 2013, my department published a consultation paper on a further set of greater flexibilities for change of use. Further reforms will save time and money for applicants and councils, encourage the re-use of empty and under-used buildings and further support brownfield regeneration while ensuring regard to potential flood risk.

### **New homes: retail to residential change of use**

Outside key shopping areas, such as town centres, we want under-used shops to be brought back into productive use to help breathe new life into areas that are declining due to changing shopping habits. This will not only provide more homes, but increase the resident population near town centres, thereby increasing footfall and supporting the main high street. Reforms will allow change of use from shops (A1) and financial and professional services (A2) to houses (C3). This change of use will not apply to land protected by Article 1(5) of the General Permitted Development Order (National Parks, the Broads, areas of outstanding natural beauty, conservations areas, World Heritage Sites).

We recognise the importance of retaining adequate provision of services that are essential to the local community such as post offices. Consideration will be given to the impact on local services when considering

the potential loss of a particular shop. The onus will be on the local planning authority to establish that the proposal would have a detrimental impact on the sustainability of a key shopping area or on local services should they wish to refuse the conversion. When considering the effect on local services they will have to take into account whether there is reasonable prospect of the premises being occupied by another retailer. Local planning authorities will need to have robust evidence base to justify any decision not to permit change of use using these prior approval tests.

In addition, to increase access to retail banking and to encourage new entrants, shops (A1) will be able to change to banks, building societies, credit unions and friendly societies, within the A2 use class. This does not cover betting shops or payday loan shops.

#### **New homes: agricultural to residential change of use**

These reforms will make better use of redundant or under-used agricultural buildings, increasing rural housing without building on the countryside. Up to 450 square metres of agricultural buildings on a farm will be able to change to provide a maximum of 3 houses.

We recognise the importance to the public of safeguarding environmentally protected areas, so this change of use will not apply in Article 1(5) land, for example national parks or areas of outstanding natural beauty. However, we expect national parks and other local planning authorities to take a positive and proactive approach to sustainable development, balancing the protection of the landscape with the social and economic wellbeing of the area. National parks and other protected areas are living communities whose young people and families need access to housing if their communities are to grow and prosper. I would note that a prior approval process will allow for flooding issues to be addressed.

#### **Change of use: extending access to education**

We also propose to extend the existing permitted development rights for change of use to state-funded schools to additionally cover registered nurseries. Agricultural buildings up to 500 square metres will also be able to change to state-funded schools and registered nurseries.

I believe that these are a practical and reasonable set of changes that will help facilitate locally-led development, promote Brownfield regeneration and promote badly-needed new housing at no cost to the taxpayer. The reforms complement both the coalition government's decentralisation agenda and our long-term economic plan.

## **Appendix Two**

### ***The National Planning Policy Framework***

Please follow this link

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

## **Appendix Three**

Please follow this link

<http://www.bradford.gov.uk/NR/rdonlyres/6803BA70-271A-47BC-B3A1-DD20CD4A6C01/0/CSPDGuidanceNotedoc.pdf>

## **Appendix Four**

**Jargon:** The planning system brings with it a range of terms and abbreviations which when used in documents can be considered to be 'jargon'. The list below identifies some of the common terms used in planning policy.

### **Allocations DPD**

A Development Plan Document that identifies sites and related policies for specific types of land use e.g. housing or employment.

### **Annual Monitoring Report (AMR)**

An annual assessment of the progress and effectiveness of policies and proposals in the Local Plan.

### **Area Action Plan (AAP)**

A type of Development Plan Document which focuses upon a specific location or an area subject to conservation or significant change (for example major regeneration). These plans provide a planning framework for an area of the district where significant change or conservation is needed.



## **Community Infrastructure Levy (CIL)**

A levy which allows local authorities to raise funds from owners or developers of land who are undertaking new building projects in the local area.

## **Core Strategy DPD**

A Development Plan Document that will provide the strategic planning framework for the district. It sets out the long-term spatial vision along with strategic objectives and policies to deliver that vision. The strategy also contains a monitoring and delivery framework. All other DPDs must conform to the Core Strategy.

## **Development Plan**

This includes adopted Local Plans and Neighbourhood Plans for the local area.

## **Development Plan Document (DPD)**

These documents form the development plan for the District. They include the: Core Strategy, Allocations, Area Action Plans and Proposals Map. These documents are the subject of an independent examination.

## **Evidence Base**

This refers to the information and data gathered by the local authority to justify the policy approach as set out in Local Development Documents, including physical, economic, and social characteristics of an area.

## **Front Loading**

Local authorities must 'front load' community involvement in the production of Local Development Documents to gain valuable feedback and comments at the earliest opportunity.

## **Inspector's Report**

A report issued by an independent planning inspector regarding the planning issues debated at the independent examination of a development plan or a planning inquiry. Reports into Development Plan Documents (DPDs) will be binding upon local authorities.

## **Issues and Options Stage**

This is a early or "pre-submission" consultation stages on a Development Plan Document. The aim is to consult the public on a plan and gain consensus over proposals before the document is submitted to the government for independent examination.

## **Key Diagram**

This is a simple strategic diagram of the spatial strategy set out in the Core Strategy Development Plan Document which shows broad locations of where housing and employment uses should be focused.

## **Local Development Documents (LDDs)**

These refer to a collection of documents including Development Plan Documents and Supplementary Planning Documents. These documents collectively deliver the spatial planning strategy for the local planning authority's area.

## **Local Development Framework (LDF)**

See Local Plan. As of March 2012, the term 'Local Development Framework' is being phased out by the Local Plan. In reality the LDF and the Local Plan refer to the same documents and processes,

## **Local Development Scheme (LDS)**

This sets out the local authority's programmed time-scale for the preparation of Local Development Documents. This timetable is reviewed and is linked to the AMR.

## **Local Plan**

This is the plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. The Core Strategy and other development plan documents will form part of the Local Plan.

It is the collection of documents that together will provide the framework for delivering the spatial planning strategy for the district. It includes:

- Development Plan Documents (DPDs) (including Area Action Plans (AAPs))
- Supplementary Planning Documents (SPDs)
- Annual Monitoring Report (AMR)
- Local Development Scheme (LDS),
- Statement of Community Involvement (SCI)

It will eventually replace the RUDF for Bradford once adopted.

## **Neighbourhood Plan**

A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

## **Planning Policy Guidance (PPG)**

This guidance was issued by central government setting out its national land use policies for England on different areas of planning. This has now been replaced by the National Planning Policy Framework (NPPF), (2012).

## **Planning Policy Statement (PPS)**

This guidance was issued by central government to replace the Planning Policy Guidance (PPGs). This has now been replaced by the National Planning Policy Framework (NPPF), (2012).

## **Proposals Map**

An Ordnance Survey (OS) map base showing site specific allocations and designations.

## **Regional Spatial Strategy (RSS)**

A strategy for a regional area such as the Yorkshire and Humber. It sets out how the region should look in 15 to 20 years time and possibly longer. The strategy identifies the scale and distribution of new housing in the region, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. This plan was adopted in May 2008.

## **Replacement Unitary Development Plan (RUDP)**

This is the current development plan for the Bradford District which was adopted in October 2005, and subsequently saved in October 2008. All planning decisions must accord with the policies in this plan.

## **Saved Plan / Policies**

This relates to policies within the Replacement Unitary Development Plans which have been 'saved' until the Core Strategy and other Development Plan Documents become adopted. Certain policies which have become out-of-date or superseded by national planning policy have been deleted.

## **Soundness**

A Development Plan Document must be considered to be 'sound' by an independent inspector at Examination for it to be adopted. To be found 'sound' a Development Plan Document should be:

- Justified - founded on a robust evidence base and the most appropriate strategy when considered against the reasonable alternative
- Effective - the document must be deliverable, flexible, able to be monitored; and be

- Consistent with national planning policy.

### **Spatial Vision**

This is a brief description of how the area will change by the end of a plan period.

### **Statement of Community Involvement (SCI)**

This sets out the processes to be used by the local authority when involving the community in the preparation, alteration and continuing review of all local development documents and development control decisions.

### **Statement of Consultation**

A report or a statement issued by local planning authorities explaining how they have complied with their Statement of Community Involvement during consultation on Local Development Documents.

### **Supplementary Planning Document (SPD)**

A Supplementary Planning Document is a Local Development Document that may cover a range of issues, thematic or site specific, and provides further detail of how policies and proposals in a 'parent' Development Plan Document will be implemented. While not part of statutory development plan, these documents provide supplementary guidance to policies and proposals contained in Development Plan Documents.

### **Sustainability Appraisal (SA)**

An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development as a plan is being prepared.

### **Replacement Unitary Development Plan (RUDP)**

This is the current development plan for the Bradford District which was adopted in October 2005 and saved in October 2008. All planning decisions must accord with the policies in this plan.