

Local Plan for the Bradford District
Core Strategy Development Plan Document (CS – the Plan))

Publication Draft

Ilkley Design Statement Group (IDSG)

IDGS agrees with the Spatial Vision and Objectives of the CS outlined at items 1-5 below which it feels should be paramount and sacrosanct for the “spa town” of Ilkley (described thus in para 3.10 p.25 of the CS). They must form the back-drop, override and prevail above all policies in the CS and be at the heart of all planning decisions in respect of Ilkley:-

Item Para Page

1. 3.1 p24) The vision emphasises local distinctiveness. It is re-enforced again in the CS
. 3.70 p47) stating that it is important that a town’s character and distinctiveness is protected and enhanced - Ilkley in IDSG’s view is unique and must not be spoilt. Open spaces within settlements, their edges, landscape settings and historic buildings, areas and street patterns all have a strong influence on a town’s character and distinctiveness. This vision is further highlighted at SC9.2 p. 63; Policy EN3 C3 p. 224; and Policy DS3 p. 288. **ALL CS POLICIES MUST RECOGNISE AND HAVE REGARD TO THIS AND ENSURE THE VISION PREVAILS for Ilkley.**
2. 3.8 p25 Emphasis throughout the CS has been (and should continue to be) placed upon regenerating existing urban areas, the re-cycling of brownfield land and the expansion of the district’s urban area. This vision has been further reinforced, since the draft CS was prepared, in the Government’s “Planning Practice Guidance” issued in March 2014 (PPG) whereby developers of brownfield sites will no longer be called upon to pay Community Infrastructure Levy. This will provide a financial incentive to encourage building homes in town and cities instead of in the countryside and help to render sustainable those developments which otherwise could be regarded as unviable or undeliverable. Para 5.3.71 p174 **MUST NOT BE ALLOWED TO CONTRADICT THIS.**
3. 3.12 p26 The River Wharfe has been and should continue to be recognised and protected from development and benefit from improved flood defences **NOTWITHSTANDING ANY POLICIES IN THE CS WHICH MIGHT OTHERWISE CONFLICT.**
4. 3.15.2 p27 prioritising the use of deliverable and developable previously developed land – brownfield land – especially to meet housing needs. This priority should be expanded to include and encourage the development and use of sustainable sites and land having the benefit of an existing planning permission but either not yet implemented or commenced and left unfinished. It is recognised some permissions will have a limited life so it is suggested that they be extended in appropriate circumstances by a final three years from the date the CS comes into effect. As to those developments where work has commenced but not proceeded to completion, a further policy

should be included to pursue developers to bring such sites into use (item 12 below deals with this).

5. 3.15.3 p27 critical infrastructure is to be delivered to support growth, and the **TIMING** of the development and infrastructure delivery is to be **ALIGNED**. However the Spatial Vision (para 3.11 p.26) places paramount weight and emphasis on the construction of a Shipley Eastern Bypass/Link Road/Relief Road (the CS is inconsistent in its description of the proposed road) and new railway stations at Apperley Bridge and Low Moor as being essential to support sustainable housing and economic growth. Whilst the plans for construction of the two railway stations are proceeding, the Shipley Eastern Bypass is not yet a line on a map. Thus this Bypass is unlikely to be constructed and in use before 2028 (if ever) bearing in mind it will impinge upon and affect the World Heritage Site of Saltaire village (protected by Policy EN3 A and B p224). The nearby Bingley Bypass took over 40 years from planning stage to completion and opening after a multiplicity of planning and compulsory purchase order public inquiries. Viability and sustainability is at the heart of The National Planning Policy Framework (NPPF) – para 14, so the absence of plans for and completion of the Shipley Eastern Bypass **PUTS INTO QUESTION THE SOUNDNESS VIABILITY AND DELIVERABILITY OF THE PLAN - Policy BD1.2 p 72 & BD.2 – C p79.**

In addition to items 1-5 above, IDSG comments on other individual policies as follows:-

Item Policy Page

6. SC 1.5 p31 Support, protection and enhancement of Ilkley must be approved and endorsed by IDSG but the town's status as a "Principal Town" in the hierarchy of settlements is questioned (population 14,809:households 6,384 – 2011 census) when compared with Keighley – a designated Principal Town also (population 53,331:households 17,116) and Shipley – not so designated (population 28,694:households 6,966). Ilkley does not have the benefit of any major employer yet at the same time (CS 2.40 p 18) unemployment is lowest in Wharfedale. In Ilkley it is 1.8% - 2001 census – compared with 5.8% in Bradford and 3.3% nationally. Ilkley also suffers diminution of public services from the closure of the Town Hall facilities and potential loss of its library and cultural activities (e.g. The Manor House). Keighley (a former borough town) is connected to Bradford by a daily 10 minute bus service contrasted with no bus service at all from Bradford to Ilkley since 2010. Train services from Bradford to Keighley and Bradford to Ilkley each run two an hour (except Sundays when the Bradford/Ilkley service is one train every two hours). Ilkley (a former urban district council) forms part of the Wharfedale A65 corridor and enjoys an hourly bus service to Leeds (and trains two an hour to Leeds) and hourly daytime bus service to Skipton. There are two buses an hour on the Ilkley/Keighley service. This is hardly a public transport system commensurate to a "Principal Town" in contrast with Keighley and underlines the fact that Ilkley is less aligned to and has limited affinity to Bradford than it has to Leeds and to a lesser degree Skipton. The designation of Ilkley – **POLICY SC4 P41/42 - SHOULD BE AMENDED FROM "PRINCIPAL TOWN" TO "LOCAL SERVICE CENTRE"**. Reference is made below to Ilkley's aging population and dearth of employment land thus precluding Ilkley as a local growth centre.

7. SC 1.11 p31 This policy must be paramount to and the **FIRST PLANNING CORNER-STONE** for Ilkley to ensure that developments are of high quality and well designed and that they contribute to inclusive built and natural environments which protect and enhance local settings and heritage and reinforce or create a sense of local character and distinctiveness. Para 14 of the NPPF states that at its heart "is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking". Para 64 of the NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions". **ALL POLICIES IN THE CS MUST RECOGNISE AND HAVE REGARD TO THIS especially** policy on the density of housing schemes at HO5 B p.175.

8. SC 2.4 p34 Ilkley is a key location for tourism, culture and recreation for all age ranges, with its many strong and ever increasing annual art, music film and literature festivals and Lido and famous Ilkley Moor and the White Wells spa. Ilkley is also a district centre for many and varied sports including cycling, tennis, rugby, football, cricket and many others ranging between golf and skateboarding, attracting many visitors especially and primarily on a regular daily basis. There is a tendency for walkers to use Ilkley as a base and meeting point resulting in excessive all day car parking particularly in New Bridge Street and Bridge Lane in addition to the regular cars parked there all day by commuters using the trains into Leeds and Bradford. Hotel accommodation in Ilkley is limited so not so much an attraction to many staying visitors. The SC (2.67 p.22) recognises the range and depth of major tourist attractions in the district, but adds that the tourism industry is under achieving in terms of volume and value of both day and staying visitors. This IDSG suggests is not the case in Haworth, Saltaire and Ilkley. Ilkley is at the heart of tourism as a key and expanding location for leisure and recreation so the **SECOND PLANNING CORNER-STONE** for Ilkley must be to address the pressures that an increasing population and expanding tourist industry (particularly day visitors) has on the town's land resource, car parking, roads capacity and other infrastructure. Ilkley is sandwiched between the River Wharfe corridor/floodplain and the Nidderdale Area of Outstanding Natural Beauty to the north and the South Pennine/IlkleyMoor and Rombalds Ridge Special Protection Area to the south. As such the potential for new development is virtually limited to the eastern and western boundaries and extremities of the town which themselves are within the Green Belt. The presumption in favour of sustainable development does not apply where specific policies indicate that development should be restricted. NPPF (footnote 9) gives examples of these policies as follows - "..... those policies relating to sites protected under the Birds and Habitats Directives and/or designated Sites of Special Scientific Interest; land designated as Green belt, Local Green Space, and Area of Outstanding Natural Beauty, Heritage Coast or with a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion". Strategic Core Policy (SC A p 57) emphasises the role of the Green Belt in halting the spread of settlements into one another (i.e. Addingham to the east of Ilkley and Burley to the west) so it must be recognised that new development (whether or not it is sustainable development) around all the edges of Ilkley will be difficult if not impossible if it is to comply with recognised policies. Paras 5.4.134 and 5.4.139 (p 241) and Policy EN7.4 (p 243) address the issue of flood risk within the River Wharfe corridor.

9. SC3.5 p38 This policy realises the potential of the Leeds City Region to ensure that the benefits

are spread across it. Item 6 above highlights that Ilkley is part of the A65 corridor running eastward into Leeds and as such has significant congruence with the A65. Leeds Council's emerging Core Strategy is set to provide 70,000 homes including a proportion within the A65 corridor in particular at Kirkstall, North Leeds where a new station is also proposed. 6,000 new homes are proposed for North Leeds (straddling the A65 and A660 corridors), 2,000 are proposed in the Leeds Outer North West area mainly at Otley between Ilkley and Leeds, and 2,300 in Aireborough (Guiselley, Yeadon and Rawdon) that will feed into the A65 and into the Wharfedale railway line at Guiseley. The A660 Leeds/Otley road adds more pressure at Burley where it also feeds onto the A65 corridor. Some of these homes targeted in the Leeds emerging plan could offset those proposed for the remainder of Wharfedale having regard to the number of people working in Leeds and travelling on a daily basis from within the A65 corridor including Ilkley. Some people working in Leeds may elect to live nearer Leeds (e.g. Kirkstall) than further out in Wharfedale (e.g. Ilkley). It is questioned if these issues have been actively addressed between Bradford and Leeds and if so with what conclusions. If it has not been addressed or actively discussed **THE DUTY TO CO-OPERATE** on strategic planning under the Localism Act 2011 and NPPF (para 44) has not been fulfilled. **AS SUCH THE PLAN IS FLAWED.** The emerging Leeds Core Strategy has already been questioned and doubted by an Inspector on a possible breach of duty by Leeds Council to actively and in a meaningful way consult and co-operate with neighbouring authorities in the Leeds City Region. Para 3.49 p39 of the CS merely indicates Bradford will work with relevant bodies to address strategic cross boundary issues not that it has done already.

10. SC4 Targets p43 This target indicates that more than 60% of housing development will be focussed on the city of Bradford, Shipley and Lower Baildon (offering the greatest scope to re-use land and buildings, make the most of existing infrastructure, and reduce the need to travel (3.62 p 44). However para 3.62 also states approximately 68% of housing development is planned for these areas under the proposals of Policy HO3 p171. 68% should be a consistent figure **TO AVOID CONFLICT AND TO ACHIEVE CONSISTENCY WITHIN THE PLAN DOCUMENTS OTHERWISE THE SOUNDNESS OF THE PLAN IS QUESTIONABLE.**

11. SC5 p49 Greater emphasis should be placed on windfall sites (para 3.80 p49) in relation to Ilkley. According to the Ilkley Civic Society investigations, between 40 and 50 houses a year have been approved for windfall sites in Ilkley. Thus if all anticipated windfall sites were taken into account (and Ilkley does have potential so this figure should continue) in the housing trajectory (Table 2 p359) for the life of the CS, this would equate to the total number of new homes proposed (50 x 16 years = 800) for Ilkley negating any further requirement from other sites. The CS does indicate that windfall allowance should be taken into account for larger sites as in the precedent set by the recent case of the emerging Leeds Core Strategy where the Inspector held support for an allowance of 500 dwellings per year. **THIS PRINCIPLE SHOULD BE FOLLOWED AND AMENDED IN THE CS FOR BRADFORD AND IN PARTICULAR FOR ILKLEY TO INCLUDE ALL WINDFALL SITES OF WHATEVER SIZE (POLICY SC5 p49).**

12. SC7 p57 Protection of the Green Belt (in place and fixed since 1948) is the **THIRD PLANNING CORNER-STONE** for Ilkley and therefore full support is given to the policy laid down in para A p57. The Green Belt provides a valuable role in supporting urban renaissance and

transformation, keeping settlements separate and the concentration of development, as well as conserving the countryside. Green Belt must trump housing numbers. Policies SC5 A3 p49, B p.57, WD2.E p.94, 5.3.2 p.152, and 5.32.9 p160 are therefore unacceptable and contrary to NPPF (footnote 9 –see item 8 above), the PPG referred to at item 2 above, and para 83 p205 if exceptional circumstances cannot apply. **THIS RENDERS THE PLAN UNSOUND.** Additionally it is stated (SC7 B p57) the general extent of the Green Belt has been revised following a selective review. **THE PLAN IS ALSO UNSOUND** because in the case of the emerging Leeds Core Strategy, the Inspector’s interim response has indicated anything other than a comprehensive review of the Green Belt to accommodate housing need is unsound, thus rejecting as unsound a selective or localised review of the Green belt as proposed in the Bradford Plan (3.102 p 57/8). Policy SC5 A p.49 sets out the priorities of allocating sites for development commencing with brownfield sites, then greenfield opportunities, Green Belt releases, and finally larger urban extensions. To reduce pressures on greenfield sites and the Green Belt, **AN ADDITIONAL POLICY SHOULD BE ADDED TO POLICY HO2 p162 whereby** the Council would pursue developers to progress and complete development (a) where planning permission has been granted but development has not commenced within the life of the planning permission and (b) where development has commenced but not proceeded to completion.

13.1 WD1 A p90 Appendix 6 (p.355) sets out the housing implementation and delivery strategy of the CS and the housing trajectory for 800 houses for Ilkley. Specific evidence has not been included in the CS as to how these targets have been formulated and calculated. Under the Localism Act 2011 and NPPF (para 50) Government policy is to encourage a “bottom up” approach to planning and to provide a powerful set of tools for local people to ensure that they get the right type of development for their community. However the imposition of the figure of 800 is quite the reverse – i.e. “top down” approach - contrary to Government policy of local communities planning for themselves and not being planned for. No compelling evidence is included as to the likely population increase of Ilkley over the life of the plan and for these reasons **THE SOUNDNESS OF THE CS ON PROJECTED HOUSING TARGETS IS QUESTIONED.** Employment in the district (if the need to travel is to be reduced (3.62p44) is likely to be centred around the city of Bradford, Shipley and Lower Baildon and Keighley where (item 10 above) some 68% of housing development will be focussed. Para 88 of NPPF further emphasises the policy to minimise the need to travel and retain jobs and housing as close to each other as possible. The opportunity for employment in Ilkley is limited so the need and demand for affordable housing in Ilkley is correspondingly limited.

13.2 HO11 p196 As referred to at item 13.1 employment (and land for employment) in Ilkley is limited since the Railway Road (new Tesco site) was re-designated from employment to retail. Consequently there is a minimal need and demand (as opposed to desire) for affordable housing in Ilkley; The existing employment/light industrial site at Riverside, Leeds Road has several vacant units – of the 7 units on the estate there are currently 2 vacant and to let .This has constantly been the case; 4 further new units built at Riverside have remained empty since they were completed. Policy WD1A p90 and Policy EC3 A3 suggest Wharfedale requires 5 Ha of new employment land yet currently Ilkley has greater supply than demand. Ilkley has an aging population (5.3.1-6 p184) – the current Ward Profile prepared by the Council indicates 32.6% of the population of Ilkley is over 60 compared with 18.6% for the Bradford district as a whole. Supply of building land is scarce – there

are limited brownfield sites in Ilkley - thus land prices are high. This deters developers contributing to affordable homes leading to arguments that potential development sites are not viable. The supply and provision of affordable homes should be dependent on demand for such homes which will vary throughout the district. Para 5.3.3 p 152 and Policy HO1.7 p 153 should be **AMENDED TO REFLECT THIS**. Item 22 below addresses the issue of affordable housing further.

14. WD1 B p90 As indicated at item 11 above all windfall sites should be allowed for and offset against the housing target figures **AND POLICY WD1 B SHOULD BE AMENDED TO REFLECT THIS**. POLICY WD 1 B p90 states "Provision will be made for associated community facilities, in particular for new schools as required.....". Schools at all levels in Wharfedale and Aireborough are working to full capacity and this is exacerbated by the raising of the school leaving age. Additional provision is needed now to meet current school demands on top of any proposed population increase in the future whether or not additional development takes place. Without further evidence as to the type and location of schools proposed **THE PLAN IS UNSOUND**. Para 4.3.2 p93 recognises a new Secondary School will be provided during the lifetime of the plan. A site near Ilkley in Wheatley Lane, Ben Rhydding was proposed some three years ago for a new secondary school under the Building Schools for the Future Scheme but Government funding for this was withdrawn. No further land or site has been earmarked for such school yet a new Secondary School in Wharfedale is essential in the early years of the plan. Para.5.3.47 it too vague and imprecise. Other aspects of community facilities which do not appear to have been addressed are hospitals and medical services. Airedale hospital at Steeton and Wharfedale hospital at Otley are both some 30 minutes distance away by car and neither have a direct link by public transport – essential for hospital visiting and patients suffering disabilities. Any population increase will place further strain on all community facilities.

15. WD1 C2 p90 Under Economic Development this policy suggests Ilkley "benefits from excellent road connectivity". The A65 (main road from West Yorkshire to the Yorkshire Dales, the Lake District and M6 motorway carrying extensive tourist traffic and heavy good vehicles) is the only major road passing through the town and as recognised by Leeds City Council in stating the A65 "is at or above capacity". In 2005 it was also acknowledged by Leeds City Council in its A65 Study at that time" that few opportunities exist to improve highway capacity on the A65". That was before the extra traffic from the 1,500 new houses which have been built in the last 10 years started to take effect. The Report concluded that "the A65 is simply unfit for the volume of traffic now or using it on weekdays and at weekends, and any further increase in traffic will see further reductions in traffic flow speeds, higher level of congestion and more rat-running through residential areas". This is a critical situation (without the additional houses referred to at item 9 above) so the assumption of "excellent road connectivity" to Ilkley **RENDERS THE PLAN UNSOUND**. Ilkley is in need of a Bypass now but financial constraints and lack of a political will preclude this for many years and beyond the life of the plan. Policy WD2 E and paragraph 5.2.3.1 p.128 of the CS refer to new road infrastructure and links along the Wharfedale corridor and improving connectivity to support economic activity and growth in West Yorkshire and the Leeds City Region (the third West Yorkshire Local Transport Plan 2011-2026 key objective) without any further details of such new roads or how that objective is to be achieved. Added to this of course is the adverse effect any additional traffic in the Wharfe valley will have by virtue of air pollution in respect of which Policy EN8.A p.249 will apply.

16. WD1 D1 p91 Environmental protection in Ilkley should be strengthened. The first word "Recognise" should be **AMENDED AND REPLACED** by "Protect and enhance....." (similar to policies D2 and D3 on page 91). Similar wording should be included in Policy D4 on page 91.

17. 5.1.33 p117 States the Tesco Supermarket in Ilkley will ensure that all the retail floor space capacity in the town will be met. This statement assumes the Tesco development proceeds, but consideration should be given in the CS as to the future use of the site if the supermarket development aborts. Tesco are known to be reviewing all their sites nationally in view of the changes in retail trends and 'on-line' shopping habits. It would also appear their proposals for the Railway Road site may have stalled in view of potential insurmountable drainage problems inherent to the site. The Railway Road land is a strategic site comprising 2.23 ha close to Ilkley town centre which was originally designated as employment land (formerly Spooners factory). In view of the acute shortage of housing, Employment Land and car parking within Ilkley, this site could meet demands for both housing and employment (5 ha requirement in Wharfedale according to the CS (Policy WD1A p90 and Policy EC3 A3 p 113)) and provide some car parking spaces and/ or park and ride facilities if the CS were to introduce a policy to re-designate the site before 2016 when the current planning permission expires.

18. TR2 D p134 Rail and bus based park & ride facilities would be appropriate to Ilkley provided that additional land were available near to the railway/bus station to accommodate this facility. Policy TR3 C (3) endorses this and it is one of the reasons why it is suggested car parking might be made available on the former Spooners site as referred to at item 17 above. If Tesco were to relocate its supermarket from its existing premises in Springs Lane to Railway Road as planned, this would present an opportunity to develop some form of car parking or park and ride facilities at the vacated Springs Lane site. Policy TR3 C(2) is supported – improvements to rail capacity and operations – as the peak time trains between Ilkley and Leeds are currently regularly running full to capacity without further development.

19. TR4 A/B p.140 At item 8 above support for tourism has already been addressed as the second planning corner stone for Ilkley. It is agreed Ilkley should not be adversely affected by the impact of transport whilst at the same time attempting to encourage both day and staying visitors.

20. HO1.9 p153 The principles for achieving sustainable housing growth should have a more vigorous policy of bringing into use empty properties in the district so as to significantly further reduce and off-set the number of new houses required. Table HO1 p.157 contains an allowance of 3,000 for reduction in vacant homes a mere 170 a year 2013 to 130. Paras 5.3.156-160 p194 address this horrendous issue -the total number of empty homes in the district at October 2012 was 9,731(4.6% of the district stock) of which 5,413 were empty for longer than 6 months. However policy HO1.9 is weak and ineffective having regard to this concern. Policy HO1.9 p153 should be amended to open – "Pro-actively and vigorously pursue a policy to reduce....." **WITHOUT THIS, THE SOUNDNESS OF THE PLAN IS QUESTIONABLE.**

21 HO1B p155 The CS indicates a requirement of 42,100 new homes for the district over the period 2013 to 2030. Until the CS and Development Plan is adopted the Government is requiring under the NPPF (para 49) for Councils to evidence a deliverable housing supply of 5 years otherwise

a potential developer on appeal may be successful in gaining permission for a scheme even if this may encroach Green Belt. "Net completions over the period 2004-2013 allowance" has been made (Table HO1 p157) leaving a shortfall to 2013 of 7,687 homes. This shortfall should be spread over the life of the plan (2014-2030) and not merely the first five years of the plan.

22. HO11.B p196 Reference has already been made to policies on affordable housing (item 13.2 above) setting out the various reasons why Ilkley is unique in this respect. The draft CS suggests a proportion of up to 30% of affordable housing on residential developments in Wharfedale without any evidence of demand or need (as opposed to desire) as to how this figure is arrived at. The Strategic Housing Market Assessment suggests a district wide target of 20%-25% (para 5.3.166 p 196) and Policy HO 11 B a target of up to 20% in towns, suburbs and villages. Yet Inner Bradford and Keighley where there is greater demand for larger family homes (Para 5.3.148-151 p.192 indicates overcrowding is most severe in Inner Bradford) have a target of 15% for affordable housing. 100 ha employment expansion is projected in Bradford (Policy EC3 A p.113) and thus creating a demand for affordable housing. Otherwise this would conflict with para 88 of the NPPF emphasising the policy to minimise the need to travel already highlighted at item 13.1 above. The demography of Ilkley according to the emerging 2014/2015 Ward Assessment records a total benefit claimant rate of 5.2% for Ilkley (district average 18.3%) and 1.9% of overcrowded households (district average 8%). These statistics would seem to show a greater need for affordable housing in Inner Bradford, Shipley and Keighley where employment (item 10 above) is to be focussed.

23 EN5 C p236 The policy on trees and woodland is supported and indeed should be rendered more robust in policy C by replacing "should" by "shall". **THE CS SHOULD BE SO AMENDED.**

24 DS1 p.283 IDSG welcomes the policy for the Council to work with communities and key ... ID7 p.307 stakeholders to develop shared vision for the future of their areas. It supports the sentiment expressed at para 5.1.2 p104 and the government's "Plan for Growth" with its local dimension where the shift in power to local communities and businesses will enable places to tailor their economic development approach to local circumstances. IDGS aim is to achieve the right things in the right places to maintain Ilkley distinct, unique and unspoilt. To this end the IDSG prepared its Design Statement in 2002 when the then Chairman of Keighley Area Planning Panel said "it will be of great value to the planning process". As such Bradford Local Planning Authority accepted the Ilkley Design Statement as a material consideration in the determination of planning applications. Copies are attached and it is requested **THE ILKLEY DESIGN STATEMENT BE ADDED TO PARA 5.7.6 P.282 OF THE CS.** IDSG regards the Ilkley Design Statement as the **FOURTH PLANNING CORNER- STONE** for Ilkley and its importance is still and currently recognised as it is included in the emerging Ilkley Neighbourhood Plan.

████████ Emmott, ██████████ Ilkley Design Statement Group, ██████████ Ilkley LS 29 ██████████

27th March 2014

ILKLEY DESIGN STATEMENT GROUP

PART B – REPRESENTATIONS – REPLIES TO QUESTIONS 3 4 5 AND 6

There are no responses under “legally compliant”: ** = NOT comply with duty to co-operate

Section	Para	Policy/page	Sound	Representations	brief representations or
				Attached item no:-	comments
3	5	SC1 p31	no	6	NOT AGREE that Ilkley is a “Principal Town”
3	11	SC1 p31	yes	1 and 7	IDSG SUPPORT good design but see comments
3	4	SC2 p34	yes	8	IDGS SUPPORT tourism opportunities
3	5	SC3 p38	** (above)	9	UNMET duty to co-operate on A65 corridor
3	target	SC4 p43	no	10	60%/68% should be consistent
3	1	SC5 p49	yes	2 and 4	SUPPORT “Brownfield” first - see comments
3	3	SC5 p49	no	12	IDGS NOT AGREE to any Green Belt releases
3	B	SC6 p53	yes	3	SUPPORT River Wharfe corridor protection
3	B	SC7 p57	no	12	Selective review of Green Belt is UNSOUND
3	1 & 2	SC9 p63	yes	1	SUPPORT “Making Great Places” as commented
4	2	BD1 p72	no	5	QUESTION if Shipley Link Road will be aligned
4	C	BD2 p79	no	5	QUESTION if Shipley Link Road will be aligned
4	A & B	WD1 p90	no	11, 12 13.1 & 14	NOT AGREE to Ilkley housing target of 800, nor to Green Belt changes, nor to limited windfall allowance.
4	C2	WD1 p.90	no	15	NOT AGREE THAT A65 “excellent road connectivity”
4	D1 & 4	WD1 p91	no	16	SEE AMENDMENTS to strengthen policies
4	E	WD2 p94	no & ** (above)	9 & 12	UNMET duty to co-operate on A65 corridor and NOT AGREE to any Green belt release

5	A3	EC3 p113	no	13.2	NOT AGREE - there is lack of demand for Employment Land in Ilkley
5	D	TR2 p134	yes	17 & 18	IDSG SUPPORT park and ride policy
5	C2 & 3	TR3 p137	yes	18	SUPPORT rail improvements also
5	A & B	TR4 p140	yes	8 & 19	IDSG SUPPORT tourism but see comments
5	9	HO1 p153	no	20	AMEND & STRENGTHEN Empty Homes Policy
5	B	HO1 p155	no	13.1 & 21	CLARIFY Housing short-fall 2004-2013
5	A	HO2 p162	no	4 and 12	TWO ADDITIONAL policies suggested
5	B3	HO2 p163	no	12	IDSG NOT AGREE to any Green belt releases
5	B	HO5 p.175	no	1 & 7 & 24	IDSG NOT AGREE to housing density for Ilkley
5	B/C	HO11 p196/7	no	13.1, 13.2 & 22	NOT AGREE to affordable housing calculations
5	3	EN3 p224	yes	1 & 7 & 24	SUPPORT preservation of Victorian townscape
5	C	EN5 p236	no	23	AMEND & STRENGTHEN woodland policy
5	4	EN7 p243	yes	3	SUPPORT River Wharfe improved flood defences
5	C	DS1 p283	no	24	REQUEST reference to Ilkley Design Statement be added to para 5.7.6
5	A-I	DS3 p288	yes	1 & 7 & 24	IDSG SUPPORT "strong sense of place" policies
6	A	ID7 p307	yes	24	IDSG SUPPORT Community involvement policy