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Core Strategy Development Plan Document

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

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

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

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Mrs	
First Name		
Last Name	Holland	
Job Title (where relevant)		
Organisation (where relevant)	Addingham Parish Council	
Address Line 1		
Line 2		
Line 3	Addingham	
Line 4		
Post Code	LS29	
Telephone Number		
Email Address		
Signature:		Date:

Personal Details & Data Protection Act 1998

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

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

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

Section	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<input type="text"/>
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4. Do you consider the Plan is:

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

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.

If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See pages 5 to 9 below - added to this submission pro-forma document.

Introduction

The Comments below are, where possible, cross-referenced to the Core Strategy Consultation Document.

They deal with issues which impact on the residents of Addingham.

The Parish Council has real concerns on the basis on which this document has been prepared. There is a lack of evidence provided by Bradford MDC to substantiate their figures and housing allocation.

Reference is made to local need, creating new schools, building better transport networks and links. However there are no indications as to how this is to be achieved, in terms of who will provide it, who will pay for it. Local need is not verified in any of the sections of the document. How has Bradford arrived at the "local need" figure of 200 houses for Addingham. What work has Bradford done to establish and prove this figure? Where is the evidence from Bradford that they have calculated this figure on a sound basis, using sound accepted analysis models?

The response is made after having taken into account comments from local groups and after holding a public meeting on 24th February 2014 where the views and opinions of local residents were recorded.

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.

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?

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

Addingham Parish Council accepts that certain additional housing will result following the adoption of the final Core Strategy document; they want to ensure that the points of concern raised above are addressed and answered sufficiently.

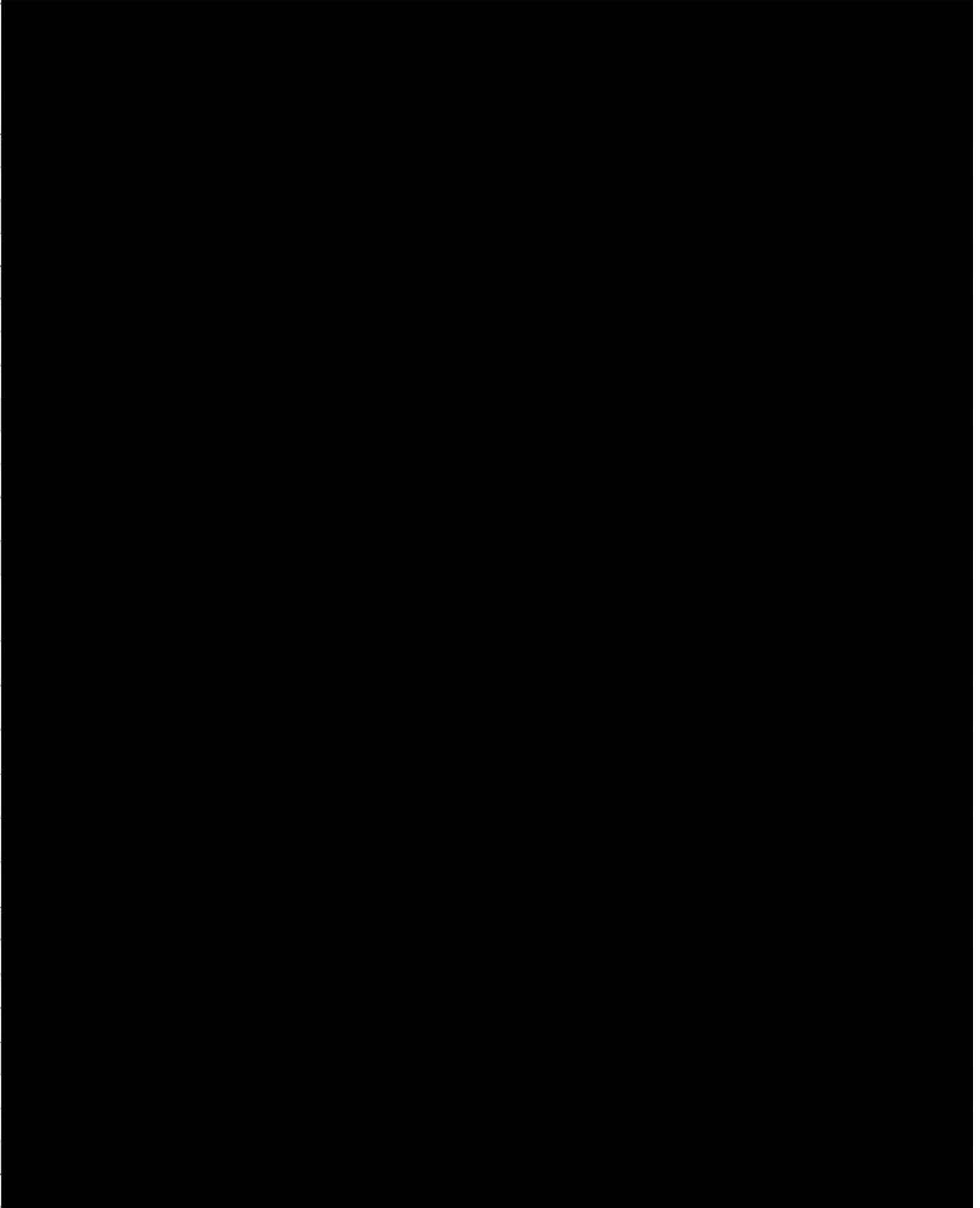
They want to ensure that the provision of any additional housing is not to the detriment of the village and its infrastructure.

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

9. Signature:		Date:	26 th March 2014.
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Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM



Background and Context

The Core Strategy Document in its Background and Context section makes reference to the "Evidence Base", Section 2.10 – 2.13 page 13

Addingham Parish Council request information to establish where the evidence has come from that substantiates the need for 200 new houses in Addingham.

What exercise has been carried out/work done to establish what "Local Need" is? Where is the proof that 200 houses is a correct figure?

Spatial Vision, Objectives and core policies

Section 3, para 3.17 page 29 Policy P1

Presumption in favour of sustainable Development-

What evidence will developers have to provide to ensure that proposed new housing will improve the economic, social and environmental conditions in the area? How will BMDC measure that developers achieve this objective. The core objective of achieving sustainable housing cannot ever be met if no detailed plans for Infrastructure improvements are provided.

Section 3 para 3.18 Page 30 Policy SC 1 –

Overall Approach and Key Spatial Priorities

Point 3 - Where is the evidence to support this point? How much work has BMDC done working with Leeds Council to determine how Bradford District will play a part in the re-generation of the Leeds City Region and similarly North Yorkshire County Council.

Sustainable Housing is that which is built close to employment, minimises negative impact on existing infrastructure. A significant number of Addingham's working population commute to Leeds and Bradford for employment. Allowing more housing in Addingham will not meet the criteria for providing sustainable housing as it will lead to more commuters, travelling substantial distances to work, exerting greater pressure on a public transport system that does not allow effective movement of passengers now and cannot cope with the existing demands from the housing stock.

Section 3 para 3.48 Page 38 Policy SC3 –

Working Together -

Points 7 and 8 sustainable transport and transport links- Addingham's links to Leeds and Bradford are through Ilkley. There are limited /nil opportunities to improve the route as it is a single route, passing through Ilkley and an area which already suffers from congestion. How will BMDC ensure that improvements will be made to public transport links? There is limited spare capacity on the Wharfe train line to Leeds and Bradford and there would be a need for a significant capital investment to allow any additional capacity. Who pays for this level of investment?

Section 3 para 3.60 page 41 Policy SC4

Hierarchy of Settlements –

This document has not been released. How can comments be made on the Core Strategy when full timely information has not been provided in the Consultation Process. When will development take place, the timetable of development is an important factor in determining a response. No area can be considered in isolation, there are multiple co- dependencies between areas and when one area will be developed will have an effect on other neighbouring areas.

There should be an Infrastructure Document associated with the Core Strategy. There is no information in the Core Strategy which demonstrates how improvements to public transport are going to be implemented. Who is going to pay for the Infrastructure improvements/requirement? No development should happen until the required infrastructure improvements have been planned/implemented and budgeted with a firm capital plan to facilitate its introduction.

Point 5 – improve public transport links. There is a natural "bottleneck" in the Wharfe Valley for traffic travelling from Addingham to Ilkley and onwards to Bradford /Leeds and other areas. Cycling opportunities are limited due to restrictions on the width of the carriageway of the A65 entering Ilkley from Addingham and the actual distance from Leeds and Bradford. Is it a realistic assumption to make that cycling would be increased in a rural area such as the Wharfe Valley? Where would cycle lanes be built? How can BMDC claim to be improving transport and easing congestion- when no solution and practical evidence of how roads in the Wharfe Valley can accommodate cycle lanes is provided?

Section 3 para3.60 page 43 policy SC4 (cont.)

Core Strategy again makes reference to the scale of housing being determined by meeting the local need. Addingham is classed as a Local Service Centre- and the Core Strategy aims to retain and improve local services and facilities. However during the past twelve months Addingham has seen the closure of a number of shops and planning applications submitted for change of use from retail to residential. Recent actual events seem to contradict with what the Core Strategy says will happen. Addingham is seeing a decline in the local shops; the shopping habits of the population have changed how will increasing houses reverse this behaviour? Residents work out of the area, they shop out of the area increasing the number of houses is more likely to lead to more people shopping out of the area, working out of the area and ultimately increasing traffic volume and congestion. What evidence does BMDC have that by increasing the housing stock, making more land available for employment use that this will reverse the trend and bring a change in consumer habits and the way increasingly families and residents choose to live? Where is the evidence documented?

Point 5 - makes reference to meet the local needs for both market and affordable housing. However where is the evidence that 200 houses will meet the local need? What is the local need? Who is demanding the new houses? If they are to be affordable housing where is the evidence to support what type of housing needs to be built? What types of families need to be accommodated in the new houses? Where is the work that BMDC has undertaken to prove they have established this level of local need?

What is affordable housing in Addingham, an area where land values are high? Where is the analysis of what families can afford to buy in Addingham?

The term "improving the area" is quoted as an overall theme. What does this actually mean; how is it measured, how has it been assessed, where is the evidence to support what the area needs in terms of housing, facilities, transport improvements. Where is the detail?

Section 3 para 3.80 page 49 Policy SC5

Section A, point 1- first priority is shown as re-use of previously developed land. This will be argued as not deliverable by developers and they will press for development in Greenfield/Greenbelt which they will confirm as deliverable immediately. A presumption in favour of development will lead to real exposure to inappropriate development in rural areas.

The priority listing is wrong; the second priority is listed as Greenfield then releasing the Green belt. Addingham Parish Council argues that in fact the second priority should be point 4 -for development of larger urban extensions in sustainable locations. i.e. where there are already transport links, where better communication networks already exist, road and rail links exist, where roads can accommodate new cycle paths.

Section B improving strategic road network will be virtually impossible in the Wharfe Valley due to the existing "bottleneck" experienced by traffic travelling through Ilkley onwards to Leeds and Bradford. This bottleneck effect will only be exacerbated by more housing in Addingham. BMDC policy will directly have a negative impact on transport links, sustainability and quality of life for Addingham residents.

Point 3 maximise accessibility by walking and cycling is not relevant to those living in the rural area of Addingham. This policy is aimed at areas where there is a real possibility of increased cycle use, as a means of transport to work, can be achieved. i.e. within a certain radius of the major urban centres.

Is it a realistic claim that the transport system can be improved so dramatically that it offers a real alternative choice to car use for those people living in rural areas? How will the A65 be able to accommodate more traffic with a natural existing bottleneck in Ilkley, when 200 new homes in Addingham and 800 houses in Ilkley are considered together? Train capacity through provision of a higher volume train service cannot be considered in isolation. There is the whole inter-area train network to consider. Trains with extra carriages cannot be accommodated at the existing train stations. There is no capacity to increase the number of train journeys each hour on the Wharfe Line. Where will the extra cars park? There is limited car-parking provided at Ilkley Station and residential roads are already congested with commuters parking. Has BMDC ascertained how improvements will be made between commuters using both the bus and rail network to commute to work? The bus service in the Wharfe Valley does not allow easy convenient access to Ilkley to allow onward travel to other destinations by train. The services are not regular and are expensive.

Section 3 para 3.93 Page 53 Policy SC 6

Green Infrastructure - How can BMDC justify building on land that is deemed important for enhancing the landscape, addressing the needs for flood alleviation, water management carbon capture and recreation? Building on the green space around Addingham contradicts directly with this policy. The requirements of providing important habitats, natural greenspace, connectivity to other green spaces and a local need for open spaces already exists in Addingham. If BMDC allows the building of more houses this will diminish what is already there and will lead to non-achievement of one of the Core Policies. The quality of the green space in the district is not uniform, green space in the Wharfe Valley is some of the highest quality in the district.

Addingham is in close proximity to the Yorkshire Dales, a National Park, and close to Bolton Abbey, It sits in a position bordered by Rombalds Moor and Beamsley Moor. Has BMDC consulted with North Yorkshire as to the protection it wants to give to areas within a specified boundary of Beamsley? Has BMDC complied with their duty to co-operate?

Section 3 para 3.95 Page 55 Fig SS3

Point 7 – how can this objective be achieved when the Habitat Survey is taken into consideration. The two principles cannot work in harmony, one contradicts the other.

Section 3 para 3.112 Page 60

Zone Bii - Addingham is covered by the measured limits of a Zone Bii area. It is bordered by Rombalds Moor, Ilkley Moor and Beamsley. How can any development take place in Addingham which would meet the criteria of "avoiding loss or degradation of areas outside European Sites that are important to the integrity of the sites"? The impact of 200 housing is in direct contravention to this objective. How has the impact of 200 homes been assessed? Where is the evidence to prove that 200 houses will not harm the natural habitat?

How can the Core Strategy meet both requirements of building new houses and complying with the Habitat Survey?

Has BMDC considered the current availability of housing for sale in the area? It is a reasonable assumption that given the availability of housing for sale, and the fact that houses remain on the market for a substantial period of time; there is no need for additional housing. The Village need does not equate to current supply and it would indicate an excess of supply over demand rather than a shortage and hence no local need. Factual evidence would not appear to back up BMDC's assessment of a need for housing.

What type of housing is being suggested? Where does the Core Strategy consider the size of houses that need to be built? Building large houses won't necessarily meet the "local need" i.e. those already living in the area. It may satisfy demand for people moving into the area however where does BMDC determine these new residents will work? If it is in the larger towns and cities the earlier arguments about inadequate transport links will apply.

Section 3 para 3.124 Page 63 Policy SC9

"Making Great Places" what has BMDC used to measure "improve areas". How is BMDC going to create a well-connected network of routes and spaces when the natural limiting geographic factors of the Wharfe Valley are taken into consideration?

Section 4.3 Sub- Area policies Wharfedale pages 90 to 94 Policy WD1

"Addingham will see creation of 200 new homes to meet local needs and associated community facilities."

What are the associated Community facilities? Who is going to provide them and pay for them?

Section C Economic Development point 3 - how is BMDC going to ensure they create excellent road and/or rail links? There is no supporting evidence to show how BMDC will tackle the problems which exist now, these problems will be exacerbated by more housing and will be difficult to overcome given the specific geographic features that exist.

Section D Environment - has BMDC consulted with North Yorkshire County Council, what is the impact of their Core Strategy document on areas of land within a specified distance of Beamsley Beacon and surrounding moorland? What will the impact of 200 homes in Addingham be on NYCC's bio-diversity habitat considerations? Addingham is within two habitat areas, one of which is in North Yorkshire; given that the two areas overlap how does Bradford reconcile ANY building in this important foraging area; as any offset requires one foraging area to be replaced by another foraging area thus making offset impossible.

Has BMDC complied with its duty to co-operate?

Section E Transport- How is BMDC going to ensure that improvements are achievable? Who is going to pay for the required improvements? How can BMDC justify improvements in bus services when in reality the level of bus services is declining?

Section 4 para 4.3.4 Page 94 Reference is made again to "local need" with no reference made to how BMDC have calculated what this local need is.

Sub-Area Policy WD2 Investment priorities

Points C & D improving access and quality of public transport are listed but with no explanation how this is going to be achieved.

Section 5.2 para 5.2.19 page 128 Policy TR1

Transport PR1 Travel Reduction and Modal Shift

The Wharfe Valley has limiting geographical features which will make the aims of the policy to reduce traffic use and ease congestion and increase use of public transport non-achievable. Rural areas are more likely to have more car users as the public transport system proves to be un-useable in terms of reliability, frequency and cost. It is naïve to suggest that behaviour can be affected so largely that rural residents will rely less on their own vehicles. Current transport links in this area are not adequate. The existing road network is subject to limitations already mentioned; public transport is not a realistic choice for many who live in this area. The majority of the working population in the Wharfe Valley will commute to work, predominately Leeds and Bradford. The public transport system does not currently offer an adequate choice for those residents who commute. The trains are already full at peak times; bus services are slow and costly. Adding more houses will not lead to any improvements but will only make the congestion and traffic situation worse. How does BMDC realistically expect to influence residents of the Wharfe Valley to increase their use of public transport when there is currently a reduction in bus services being implemented?

Section D how do BMDC realistically expect to be able to manage traffic demand in an area such as the Wharfe Valley and Addingham? Residents rely on cars as they are the only reliable method of transport they have. City centre and large urban areas do have a choice of transport modes - rural areas do not have the same choice.

Section 5.3 para 5.3.170 page 196 Policy HO11

Affordable Housing - where does the ratio of 30% affordable housing come from? Where is the **evidence** to support this figure? Addingham's demographic is an ageing population. So who needs the affordable housing?

Education

Numerous references are made in the Core Strategy Document to provision of schools and building of new schools where required. However there is no evidence to show how BMDC are going to actually provide these new schools? Where are they going to be built? Who is going to pay for them?

In Addingham the main choice of Secondary School is Ilkley Grammar School. It has been well documented in the past what problems this area has faced due to an over capacity issue at IGS. The school is not big enough to accommodate the current secondary school population and has had to make decisions to take in pupils over and above the Published Admission Number. Building an additional 1600 houses in the Wharfe Valley will have an adverse impact on the provision of education. Plans to expand Keighley will lead to the Secondary schools in this area being full. Where are the children of Addingham to be educated? Where is the policy which relates to providing an adequate, satisfactory and safe education environment?

Increases in housing in all neighbouring areas will lead to a large increase in demand for secondary school places. BMDC cannot plan for new housing without planning for new schools.

Leeds CC has no spare capacity to take in children from the Bradford District. Has BMDC consulted with Leeds CC about school provision? In the Wharfe Valley there are three Local Authorities involved in the provision of education. Building more houses in one area, or as more likely all areas, will have an enormous impact on the demand for school places. The Core Strategy cannot be prepared on a sound legal basis if there is no planning for the associated Infrastructure, education, transport that will need to accompany it. To mention it in the document with no detail as to how it will be provided, when it will be provided and who will pay for it is not acceptable and casts doubt on the integrity of the whole document and questions whether BMDC have complied with their legal duty to provide a Sound document.

Conclusion

Addingham Parish Council sees no evidence to substantiate Bradford's figures for development in both Addingham and the Wharfe Valley. They however are not against development provided it is evidenced and assessed on the basis of actual measured local need and the required changes to infrastructure are guaranteed. The impact of their proposals has not been properly assessed. They have not considered the physical location and limitations the area imposes on Infrastructure changes. They have not provided any evidence how the figures for housing are derived, they have ignored the most important local concern of education and make scant reference to providing new schools but without any detailed analysis of how this is going to be achieved. They make assumptions which cannot be applied equally to urban and rural areas.