

Dear Sir



ILKLEY

LS29

18. iii. 14

Bradford MDC Core Strategy DPD 2014

I wish the contents of this letter to be treated, both by the Bradford MDC and any inspector subsequently appointed, as objection to the justification for, and therefore the soundness of the Core Strategy proposed by the MDC in their present DPD as it affects Ilkley.

To that end, I am grateful to the Ilkley Parish Council for their good offices in collating local objections and lodging them with the MDC.

Two preliminary matters:

1 It will be apparent from my address above that my property is the closest to the site identified on the plan of Ilkley as IL/012. I therefore have an immediate personal interest separate from the generality of my objections below. It is, of course, necessary that I disclose it.

2 I have had the considerable advantage of reading a copy of the letter of objections, dated 17th February 2014, from Sir Rodney Brooke, addressed to the Parish Council.

Repetition is a tedious, time-consuming and unnecessary exercise. I therefore record that I adopt the contents of that letter in their entirety as an essential basis for my objections. What therefore follows is mainly by way of additional comments, designed to illuminate and reinforce those expressed by Sir Rodney.

My professional experience both at the Bar and as a (now-retired) Justice of the High Court did embrace Judicial review, including issues of planning approval. However, I defer readily and totally to Sir Rodney's lifetime experience in all aspects of local government. He is a former Chief Executive of West Yorkshire County Council, Westminster City Council, and (finally) the Association of Metropolitan Authorities. In those capacities, he has an informed and un-rivalled perspective of many of the criteria properly to be addressed in proposals of this nature. For that reason, I suggest that his reasoned objections should be afforded special weight, and why I believe that they encapsulate many of the matters that I would otherwise have wished

myself to rehearse. [Where necessary, I refer to Sir Rodney or his letter as "RB"]

As to site IL/012

Three points:

(a) Unlike any of the other proposed sites, it is not located in contours or folds which would serve to to any degree to minimize the visual impact of development. From the North side of the Wharfe valley, the site is the predominant part of very significant and attractive visual aspect of the Western end of Ilkley.

(b) It cannot be treated as "Infill". Development would obviously represent an extension of the town Westwards towards Addingham.

I suggest that this is prima facie undesirable; there should be a presumption against it.

(c) The impact of the development on traffic on the A65 trunk road.

Whatever form of access/egress to/from the site is envisaged, the A65 is already at bursting point through and on both sides of Ilkley. This very significant point demands elaboration:

(1) The clear and compelling necessity to address this problem in an effective comprehensive manner has been apparent to the planners for many years. A proposed by-pass was recognize as the only solution that would meet the exigencies of traffic on the A65-and that was at least 7 years go, since which time the there has been an incremental increase in the number of vehicles. The recent history of the by-pass proposals reveals that a Northern route was in active contemplation-startng in the West, between Ben Rhydding and Ilkley, crossing the River Wharfe and then passing in a broad arc Northwards and Westwards, via Middleton, over part of the golf course, and re-crossing the river, re-joining the A65 at the Addingham by-pass.

Most regrettably, a widespread imposition of public spending constraints doomed the project. There is no sensible prospect of its revival.

(2) The very serious impact of its abandonment was-and has become increasingly-obvious. There was growing concern about the degree of vehicular congestion (and the attendant pollution) on the A65 as it passed through the middle of the town, or stood in long queues with engines idling.

An attempt has been made to address this problem, by way of installing traffic lights at the junctions of the A65 with Ben Rhydding Road (to the East) and with Victoria Avenue (to the West). This was designed to reduce the amount of traffic held up at any one point in time in the town centre [by the Brook Street traffic lights, or simply by congestion].

This change has been unsuccessful. Throughout most of the day, long queues of vehicles (including multi-axled wagons) still congest the centre of the town.

In remarking on this issue, I refer to RB para 3.

RB para 9

It is completely beyond rational argument that parking in the town centre is in crisis.

The existing "Pay & Display" central car park is effectively the only useable off-road facility in the town. It cannot begin to meet the demands presently placed upon it-let alone the pressures to be generated by (let us conservatively assume) another 1200 vehicles stemming from new housing.

In the past 2-3 years parking wardens have been employed. Their zealous efficiency in patrolling the Town centre streets where parking time limits are in force has driven increasing numbers to those streets further afield bereft of such restrictions. RB speaks of Middleton Avenue. Grove Road is another. The Northern end of it suffers parking on both sides of the road for a length of some 100 or more yards, starting from the point where restricted parking ends. Many are parked there while their drivers walk the 400 yards to the railway station, and leave Ilkley for the working day. I was told that yellow lines were contemplated, effective the end of last year; I still await. Meantime, the passage of fire engines or other emergency vehicles is a lottery, and other drivers must treat the road as "one way or another" having precedence.

This is a microcosm of many other streets; I just happen to use Grove Road on a daily basis.

RB para 10

It is common knowledge, born of experience not only in this country, but e.g. in the USA that prevailing and forecast economic conditions have created a

sea-change in housing markets. It is clear that there has been an "agonizing re-appraisal" by lending institutions of those who are inclined [or tempted] to over reach themselves in buying homes that they cannot afford. That is why affordable housing is a keystone of national policy towards future housing needs.

Having regard to land prices in Ilkley, I do not envisage prices of any newly constructed houses being affordable homes. They would be a much more likely prospect in the areas as described by RB in the above paragraph.

It follows that:

(1) There should indeed be a fresh appraisal of Brownfield sites.

(2) If they were developed as suggested, the those who would live and work there would still enjoy Ilkley as the amenity described in RB paras 1 & 2.

[Just to anticipate a spurious argument that might enjoy a superficial charm, the traffic and parking problems that I have outlined are not on any proper analysis to be attributed to tourism. They are endemic by reason of business and heavy goods traffic thronging the trunk road, and from the existing residential population].

In summary, I respectfully suggest that the present proposals may satisfy at least some of the technical criteria enjoined on those responsible for preparing and submitting the present DPD. I do not for one moment question their efforts, or their anxiety to address legitimate public needs and expectations. Theirs is not an easy task. One of its principle dangers lies in the fact that, in seeking to give account to every relevant criterion expressed in the procedures, the authority ultimately fails to see the wood for the trees

I contend that that is precisely what has occurred here.

I contend that, for the reasons I have set out, viewed fairly and objectively the MDC proposals are unjustified, and therefore unsound. They should not be adopted.

[Redacted]

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[Hon. Sir H. [Redacted] Ognall DL]

[Redacted]
The Ilkley Parish Council
Town Hall
ILKLEY