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[REDACTED] **Ilkley, LS29** [REDACTED]
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30th March 2014

Local Plan Group, Jacobs Well, Nelson St., Bradford BD1

Response to Core Strategy consultation

We do not consider that the Plan complies with the Duty to co-operate with the public. The documentation is so extensive and complex, which combined with the way the Council is requiring a separate form for every Section, Paragraph and Policy commented on is in our view deliberately designed to ensure a minimum response and put off ordinary members of the public who do not have specialist knowledge and time to do this. That is certainly what we have found when talking to people in Ben Rhydding.

At the outset while opposing a number of the policies in the plan we do support the need for a Development Plan to be in place as soon as possible.

1. In general we oppose those aspects of the plan which conflict with National Planning Policy on preserving the Green Belt and the best and most versatile farmland it encloses; that there is no corresponding infrastructure planned to deal with the consequences of extensive new housing developments – i.e. there is no new school planned to deal with the increased numbers at an already overcrowded and oversubscribed Grammar school, that both Bradford and Leeds Council's have recognised that the A65, the only road in and out of Ilkley, is already congested and at over capacity; there is no, or little, scope for longer trains or platforms and peak time trains are already congested, parking is already at a premium, the town's medical centre cannot take another 3,000 patients etc. More detailed objections are developed below.

2. In the first instance we oppose the designation of Ilkley as a Principal Town as unjustified. Apart from the fact that it is only a fraction of the size of other places in the District, such as Keighley, or even Shipley, which are deserving of the designation as Principal Towns the fact that the whole town is within 2.5 Kilometres of the Habitats Protection Zone means that the scale of development proposed together with the strain on related infrastructure, both existing and required, can be considered as overdevelopment. Therefore it conflicts with:

3. Par 14 of the NPPF - Adverse impacts significantly and demonstrably outweigh benefits and specific policies indicate development should be restricted.

4. Par 28- The plan does not support development and diversification of agricultural and other land based rural businesses or rural tourism and leisure developments.

5. Par 37- There is no balance of land uses – only 5Ha employment land allocated.

6. Par 47 – There is no mechanism to enforce affordable housing requirement. A report last year identified Bradford as one of the places in which developers had run rings round local planners in avoiding agreed affordable homes in various schemes. 7. And there is certainly a need for this in Ilkley as in other parts of the district. A report

a few years ago by the Rural Housing Enablers on Housing Need in Ilkley concluded that .. *between 9.1% and 12.9% of the population identified a housing need.*

7. Par 48 – There has been no allowance for windfall sites (i.e. 972 units have been granted planning permission in Ilkley in the past 10 years which provides compelling evidence that windfall of this scale could well continue and be sufficient in itself to accommodate all of the growth that Ilkley can take).

8. Pars 52/4 – No co-operation with neighbouring communities to develop New Towns or Garden Cities – which would have been an alternative to proposing Green Belt deletions.

9. Par 77 – There is no sufficient choice of school places planned or plans to expand, create or alter secondary schools. Schools in Ilkley are already oversubscribed, especially the Grammar School and every year parents wait with trepidation to see if their children will have a place. Special arrangements after appeals have often had to be made. There is simply no way another 1,500 children can be accommodated.

10. Pars 80, 81 & 82 – Green belts should only be altered in exceptional circumstances. There is no compelling or exceptional circumstances for doing this.

11. Par 111 – There has been minimal consideration of using Brownfield land.

12. Par 112 – The NPPF states that the best and most versatile land should be safeguarded (and that in Coutances way is also in the Green Belt) so land in Coutances Way should not be earmarked for housing development.

13. Par 120 – There has been minimum regard paid to pollution effects of waiting traffic on Coutances Way. Plus the land north of the Railway line is nationally known for ringslip problems. The A65 cannot take another 800 cars morning and evening without causing considerable congestion problems.

14. Par 128 – This paragraph requires consideration of heritage assets and their setting – the only appropriate setting for the Georgian farmhouse off Coutances Way (Lawson's Farm) is on a farm - not a housing estate.

15. Par 158 – It is considered that full account not taken of market signals. Firstly a number of large developments in Ilkley have been halted for some time (Clifton/Bolling Rd) so this may be a signal of overdevelopment already in the area. Secondly Bradford's initial documentation is replete with evidence that Bradford is a particularly deprived district, 42% of residents live in areas that fall into the 20% most deprived nationally, and 5% living in areas that are among the 1% most deprived. Overall, two-fifths of people live in some of the most deprived areas in the country, 34% on very low incomes, 19% claiming key benefits, unemployment is higher than average and weekly wages are almost £80 less than the national average, there are a high proportion of people without qualifications (21.8%: 13.8% nationally).

Household income in places like Little Horton averages £22,000. There is simply no way that the overwhelming majority of people in Bradford will be able to afford the type of housing that will be built in Ilkley. Bradford cannot therefore claim that building executive type homes in Ilkley is a correct response to deal with the population increase in the areas where it is occurring. The average price for new houses in Ilkley is around £340,000 while in Bradford it is £140,000.

There is also a considerable question mark over the study for the "objective" Housing Requirement Study and therefore the "objective" nature and status of that report (Feb. 2013, Ref Par 5.3.6) and the Housing Requirement Addendum Final Report. This cannot be taken as an objective report given that the company which undertook it marketed a vital 17.6 Hectare site of Ben Rhydding Green Belt a month before being commissioned to do this study.

16. Taking of Green Belt land. Planning Policy dictates that Green Belt land should be protected and preserved. The Green belt land identified in Ben Rhydding for example helps separate communities, provides high grade agricultural land, and also provides a wildlife refuge and pathway - linking the River Wharfe, and the extensive open areas of North Yorkshire to the North of the River and the wild open lands of Rombalds Moor to the South.

17. Flood risk and urban drainage management. Linking with the Greenbelt land issue above, Green space is essential in sustainable drainage practice. It has previously identified in Planning Enquiries relating to the previous plans to redevelop Ilkley Grammar school on the land bordering Wheatley lane and Leeds Road in Ben Rhydding that the lower lying area of this land is identified in the Environment Agency Flood Risk Maps (<http://maps.environment-agency.gov.uk/>)- as flood plain (1:100 Year Return Period). All recent evidence relating to recent flood events, Floods and Water Bill, Cave Report, The Pitt Report and all expert guidance (www.ice.org.uk, www.ciwem.org.uk) identify development of any flood plain lands into urban infrastructure should NOT take place (PPG25). This applies equally to land in the 1:100 Year and 1:1000 Year return periods. Furthermore, notwithstanding the likely flood risk of any development on this land - where even non permanent structures and open structure such as fences, nets etc. are subject to a full Flood Risk Management Plan - taking of Greenspace in upstream catchments such as Ben Rhydding/Ilkley are largely to blame for increased flood levels in downstream areas increasing risk to property and life. Predications for Climate Change in the UK show an increased probability of extreme rainfall events leading to an increased likelihood of flooding and associated risk to properties and life in the River Wharfe area and the lower reaches of the Ouse into which the Wharfe drains are already areas of extreme flood risk — flood plains are now a valuable resource in their own right - and any development into the upstream reaches of these catchments must be very limited and the flood plain (as designated in the EA Flood risk Maps) protected at all costs..

We refer you to paragraphs 99 to 106 of the NPPF. These back up the views expressed above entirely. There is no way that the land identified on Coutance Way can meet either the exception or the sequential test in regard to flood risk at the site or increasing the risk to downstream areas. The fact that this land is included in the plan for prospective development undermines the validity of the whole plan such is the level of this oversight.

18. Specifically in Ben Rhydding ANY increase in urban runoff increases flood risk to the local properties. Despite recent investment in the sewer network to protect against flooding of properties against the 1:10 internal and 1:30 area criteria, Ben Rhydding still retains a high residual of flood risk because despite investment from YW the Critical Other Water course - managed by MBBC that flows down Wheatley Lane into the River Wharfe is reported by Local Drainage management to be in very poor structural condition and also hydraulically overloaded in wet weather events due to local hydrological and geological conditions. This culvert is not capable of handling increased peak flows generated by excessive green field conversion to paved and hard surface areas.

Suggested Modifications to the Plan

1. Include in the Principal Policies and Statements that in accordance with the NPPF that settled Green Belt boundaries, which also includes the best and most versatile farmland, will be protected from development especially that referred to above as being at flood risk.
2. Section 3, Paragraph 60; Remove Ilkley from the list of Principal Towns
Add Ilkley to the list of Local Service Centres and Rural Areas
Outcomes ; - Remove Ilkley from second Row and add to fourth row Outcomes.

3. In accordance with Paras 52-4 of the NPPF begin consultations with Neighbouring Authorities to explore the possibility of developing GardenCities/New Towns to ensure there is minimum need to delete exceptional areas of Green Belt