

# ILKLEY NEIGHBOURHOOD DEVELOPMENT PLAN (2020 TO 2030) COMMENTS FORM (JULY 2021)

The Ilkley Neighbourhood Development Plan has been submitted to City of Bradford Metropolitan District Council (CBMDC). The Council is now required to consult on the plan for a period of at least 6 weeks. The Plan and supporting documents are available to view electronically at: [www.bradford.gov.uk/consultations](http://www.bradford.gov.uk/consultations) as well on the Council's Opus Consult portal: <https://bradford.oc2.uk/>. Hard copies are available to inspect during normal opening hours at:

- CBMDC Customer Service Centre, Britannia House, Hall Ings, Bradford, BD1 1HX
- City Library, Centenary Square, Bradford, BD1 1SD
- Ilkley Town Council Office, Ilkley Town Hall, Station Road, Ilkley, LS29 8HB
- Ilkley Library, Station Road, Ilkley, LS29 8HA
- Ilkley Visitor Information Centre, Town Hall, Station Road, LS29 9HB
- Clarke Foley Community Centre, Cunliffe Road, Ilkley, LS29 9DZ

This consultation seeks your views on whether the Ilkley Neighbourhood Development Plan meets the Basic Conditions<sup>1</sup> which are that the plan:

- Must be appropriate having regard to National Planning Policy
- Must contribute to the achievement of sustainable development
- Must be in general conformity with the strategic policies in the development plan for the local area
- Must be compatible with human rights requirements
- Must be compatible with EU obligations.

All comments received will be sent to an independent examiner who will examine the plan. If the examiner determines that the plan meets the basic conditions, then a referendum shall be held on whether to 'make' the Neighbourhood Plan.

The consultation period starts on **Friday 16<sup>th</sup> July** and closes at 5pm on **Wednesday 15<sup>th</sup> September 2021**.

### **How to submit your comments?**

Comments can be submitted via the following:

- **Online:** <https://bradford.oc2.uk/> (*Registration required*)
- **Email:** [planning.policy@bradford.gov.uk](mailto:planning.policy@bradford.gov.uk)
- **Post:** Local Plan Team, City of Bradford Metropolitan District Council, 4<sup>th</sup> Floor, Britannia House, Broadway, Bradford, BD1 1HX (*Please ensure that there is sufficient time to guarantee delivery to our offices by the closing date for comments*)

### **Completing the Comment Form**

There are two parts to this form; *Part A: Personal/Agent Details* and *Part B: For Comment*.

### **Contact Details:**

If you have any further questions please contact the Local Plan Team using the details below:

- **Telephone:** 01247 433679
- **Email:** [planning.policy@bradford.gov.uk](mailto:planning.policy@bradford.gov.uk)

<sup>1</sup> <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

**NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**  
**REGULATION 16: PUBLICISING A PLAN PROPOSAL**  
**ILKLEY NEIGHBOURHOOD DEVELOPMENT PLAN (2020 TO 2030)**  
**COMMENT FORM**

For Office Use only:	
Date Rec.	15/09/2021
Date Ack.	
Respondent ID	7040
Representation Ref:	29872-76

- **Address:** Local Plan Team, City of Bradford Metropolitan District Council, 4th Floor, Britannia House, Hall Ings, Bradford, BD1 1HX

**PART A: PERSONAL DETAILS**

Please provide your personal contact details. If an agent is appointed to represent you, then they would need to provide their full contact details in addition to your Title, Full Name and Organisation (where relevant). This information is required to enable the independent examiner and/or the Council to contact you for further information if required during the examination of the Neighbourhood Plan.

You and/or your appointed agent (if relevant) can request to be notified once City of Bradford Metropolitan District Council has decided to “make” the Ilkley Neighbourhood Development Plan, following the Independent Examination and local referendum. This decision is the final statutory stage in adopting the Neighbourhood Development Plan. Please indicate below whether or not you wish to be notified.

1. PERSONAL/AGENT DETAILS		
	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title		
Full Name		Johnson
Job Title (where relevant)		
Organisation (where relevant)	Redrow	Johnson Mowat
Address		
Post Code		
Email Address		
Telephone Number		

**2. FUTURE NOTIFICATION**

Please tell us if you would like to be notified when City of Bradford Metropolitan District Council decide to make the Plan under Regulation 19 (to bring it into legal force after examination and local referendum).

Yes

No

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<b>Representation Ref:</b>	29872-46

**Data Protection Statement** - Any information we receive will be processed in accordance with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. A Local Plan Privacy Statement sets out CBMDC Local Plan Team processes your personal data. This notice should also be read in conjunction with the Council's Corporate Privacy notice and other specific service notices, which are available at <https://www.bradford.gov.uk/privacy-notice/>

**PART B – YOUR COMMENTS**

If responding using this form, please use a separate Part B sheet for each different part of the Plan or supporting document that you are commenting on, and clearly state to which part of the document it relates.

<b>3. To which document does your comment relate?</b> <i>Please place an 'X' in one box only</i>			
Neighbourhood Development Plan	<b>X</b>	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

<b>4. To which part of the document does your comment relate?</b>					
Whole document	<b>X</b>	Section		Policy	
Page Number					

<b>5. Do you wish to?</b> <i>Please place an 'X' in one box only</i>					
Support		Object		Make an observation	<b>X</b>

<p><b>6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.</b></p> <p>Please see the attached letter.</p>
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Respondent ID	
Representation Ref:	

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6. Signature:		Date:	15/09/2021
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**JohnsonMowat**  
Planning & Development Consultants

Local Plan Team  
Britannia House (4<sup>th</sup> Floor)  
Hall Ings  
Bradford  
BD1 1HX

E-mail [REDACTED]

Telephone [REDACTED]  
Email [REDACTED]

Our ref.  
Your ref.

15<sup>th</sup> September 2021

Dear Sir or Madam,

**ILKLEY NEIGHBOURHOOD DEVELOPMENT PLAN 2020-2030  
SUBMISSION DRAFT AUGUST - SEPTEMBER 2021**

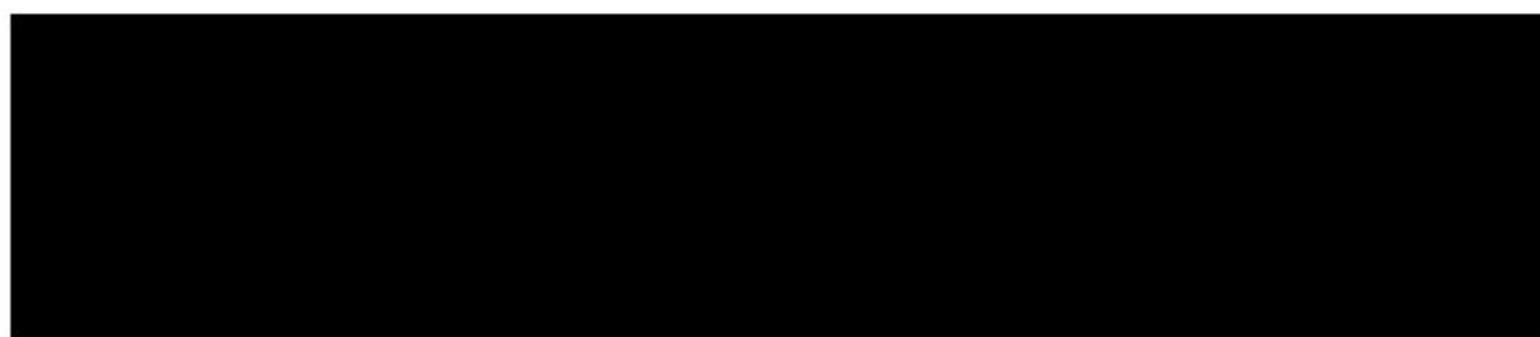
We write on behalf of Redrow in relation to their land interests on land off Wheatley Lane, Ilkley (SHLAA Site Ref IL/013). Johnson Mowat have made a number of representations and submissions to the Council via the Local Plan process in relation to the suitability of this site, including the submission of a Promotional Brochure in July 2016 in response to the Site Allocations DPD Issues and Options consultation, and more recently the completion of a Site Deliverability Request Form in July 2020. The site is not identified in the March 2021 Draft Bradford District Draft Local Plan and submissions were made regarding the suitability of the site and the strong case for the inclusion of the site in the Bradford Local Plan.

We welcome the opportunity to respond to the Submission Draft of the Ilkley Neighbourhood Plan and trust that our below comments will be taken into consideration. We request that we continue to be kept informed of the future stages of the Neighbourhood Plan, including the Examination stages, and request that Johnson Mowat continue to be notified.

We set out below our comments to individual policies contained in the Submission Draft.

**Vision and Objectives**

Redrow welcome the Ilkley 2030 Vision which seeks a vibrant, viable, sustainable and successful town by 2030. Objective 1 'Sustainable Residential Development' is supported as a crucial objective in achieving





the Vision to help secure sustainable development. It is considered that land off Wheatley Lane, to the rear of existing development on Wheatley Lane will provide the opportunity of assisting in meeting the Vision and Objective 1. The site is located in a sustainable location, on the edge of Ben Rhydding. It is close to existing services and facilities, with excellent public transport links (bus services and Ben Rhydding Train Station). The development of this site provides an opportunity for creating a scheme to form an important gateway development when entering into Ilkley from the east, and its allocation via the Local Plan will contribute to a robust housing supply in Ilkley, reducing pressure on other sites from speculative development.

### **Policy INDP1 – New housing Development within Ilkley**

It is welcomed that the Ilkley Neighbourhood Plan acknowledges that it is for the Bradford Local Plan to establish the revision of Green Belt boundaries and not a matter for the neighbourhood plan process. In this regard the Neighbourhood Plan Policies Map does not identify Green Belt, or individual housing sites therefore allowing for the Local Plan process to establish Green Belt revisions and allocated housing sites. This is a sensible approach as it allows for the Neighbourhood Plan to align with the future Local Plan.

The minimum density requirements of 30 dwellings per hectare on (most) housing schemes, and appropriate mix of housing types, sizes and tenures on housing sites above 10 dwellings as set out in Policy INDP1 is deemed appropriate and the policy wording allows for flexibility. Redrow are confident that an appropriately designed scheme at Wheatley Lane (IL/013) can be delivered to meet Policy INDP1 requirements.

The background text to this policy (paragraphs 5.3 and 5.4) requires updating to reflect the change in Council's policy preparation. The Council are no longer preparing a Core Strategy Partial Review and Allocations DPD and are instead preparing a composite Local Plan.

### **Policy INDP3 – Protecting and Enhancing Recreation Facilities**

It is recognised that INDP3/12 'Ilkley Riding Centre, Leeds Road' is identified on the Ilkley Neighbourhood Development Plan Policies Map as a protected recreation facility. This lies to the immediate east of Site IL/013. Redrow can confirm that the development of Site IL/013 will not have an impact on the protection of this identified recreation facility.



**Policy INDP5 – Encouraging High Quality and Zero Carbon Design**

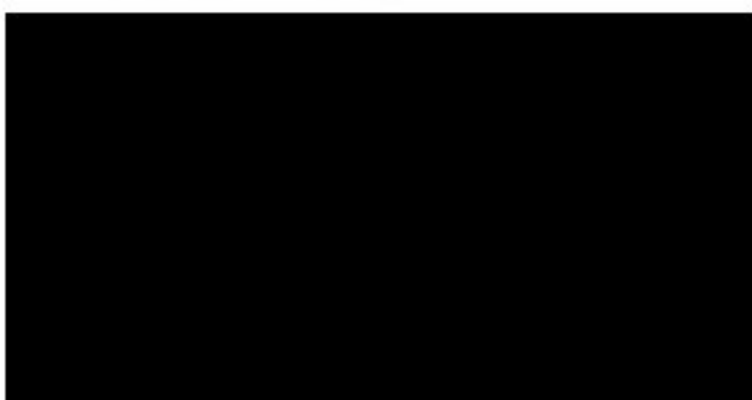
Redrow support the principles of high quality design and transition to zero carbon design, where this aligns with National policy requirements. The language in Criterion H) is however onerous and inflexible “New development must incorporate sustainable drainage systems.” It is considered this should be amended to read “New developments should incorporate sustainable drainage systems wherever possible”. This allows for certain circumstances where SuDS are not possible and aligns with the language (‘encouraging’, ‘aiming’, and ‘should’) elsewhere in the policy, as well as alignment with NPPF paragraph 169.

**Policy INDP13 – Protecting and Enhancing Biodiversity**

This draft policy refers to all developments being expected to result in measurable biodiversity net gain. Redrow are committed to the delivery of measurable biodiversity net gain through their housing developments and are confident that the development of Wheatley Lane can deliver ecological enhancements as part of landscaping and building design in accordance with this proposed Policy.

We trust the above comments are welcomed and look forward to further dialogue with the Council and Neighbourhood Forum during the Examination stage of the Neighbourhood Plan preparation. Should the Neighbourhood Development Plan Working Group require any additional information regarding proposed Site IL/013 please do not hesitate to contact Johnson Mowat.

Yours sincerely



**Mark Johnson**  
Managing Director