

Ilkley Neighbourhood Development Plan 2020 - 2030

Consultation Statement

January 2021



Ilkley Town Council

A landscape photograph showing a grassy hillside with large, dark rock formations under a blue sky with white clouds. The foreground is filled with purple heather.

Ilkley Neighbourhood Development Plan 2020 – 2030

A beautiful, vibrant and
sustainable town

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1.0 Introduction and Background

- 1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ which defines a “consultation statement” as a *document which –*
- a) *contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
 - b) *explains how they were consulted;*
 - c) *summarises the main issues and concerns raised by the persons consulted; and*
 - d) *describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*
- 1.2 Planning Practice Guidance provides further advice:
- "A qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan (or Order) and ensure that the wide community:
- Is kept fully informed of what is being proposed
 - Is able to make their views known throughout the process
 - Has opportunities to be actively involved in shaping the emerging Neighbourhood Plan (or Order)
 - Is made aware of how their views have informed the draft Neighbourhood Plan (or Order). Reference ID: 41-047-20140306.
- 1.3 The Ilkley Neighbourhood Development Plan (INDP) has been prepared in response to the Localism Act 2011, which gives town and parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this Framework.
- 1.4 In 2012, as a qualifying body, Ilkley Town Council decided to prepare a Neighbourhood Development Plan (NDP). The Town Council applied to City of Bradford Metropolitan District Council (CBMDC) for the whole

¹ <https://www.legislation.gov.uk/ukxi/2012/637/contents/made>

town area to be designated a neighbourhood planning area (see Figure 1, page 6 of the NDP). This application was approved by the CBMDC's Executive Committee on 5th November 2013.

- 1.5 The INDP has been prepared by a working group of town councillors and experienced volunteers including members of the Ilkley Design Statement Group, Ilkley Civic Society, Ben Rhydding Action Group and Climate Action Ilkley. They have been assisted by a professional consultant from Kirkwells. The INDP preparation has included consulting with the local community through household surveys, public drop-in sessions, public meetings and statutory consultations, analysing evidence, carrying out technical studies and responding to CBMDC's Core Strategy consultations.

2.0 Early Informal Consultation and Engagement 2014 to 2015

Public Meeting, November 2014

- 2.1 A public meeting to publicise the start of the neighbourhood plan process and to engage local people was held in November 2014 (**Appendix 1**). An initial survey was conducted via Survey Monkey and using paper response forms. The hard copies of response forms are stored in the Town Hall and an example of the questionnaire provided (**Appendix 2**).
- 2.2 Over 180 people attended this event and took part in six discussion groups (Life in Ilkley, Housing, Employment, Transport and Parking, Facilities and Infrastructure and Environment).
- 2.3 The top Issues in each discussion group were:

Life in Ilkley

1. Ilkley must retain its heritage, charm, green spaces and feeling of safety
2. Easy access to the Moor and countryside
3. Community spirit (joint)
4. Too much/poor traffic flow (joint)

Housing

1. Starter/smaller homes/housing association homes needed
2. Smaller developments
3. No more housing please

Employment

1. More 'local' jobs needed/service not industrial
2. More "first" job opportunities needed in Ilkley
3. Support for start-ups and SMEs

Transport and Parking

1. More traffic calming, especially around local schools
2. Big parking problems across the town centre
3. Additional car parking needed/park and ride needed

Facilities and Infrastructure

1. Sporting facilities
2. Secondary school places
3. Primary school places

Environment

1. Preservation of green spaces and open space
2. Maintenance of natural environment
3. Paths and facilities to enable use of local environment without causing harm

- 2.4 This early public consultation indicated that the issues of greatest concern for the future development of the town were to:
- conserve the setting of Ilkley within Wharfedale and protect the history and heritage of the town;
 - maintain suitable access to the countryside and protect green space in, and around, the settlement;
 - reduce congestion and improve car parking;
 - address concerns over future education provision in terms of the number of local school places;
 - make sure infrastructure provision keeps pace with new development so that such development is sustainable; and
 - influence the future mix of housing (the size, type and tenure of homes) so that it meets identified local needs.

'Let's Talk About Ilkley' Questionnaire Survey, December 2014 - March 2015

- 2.5 Following the event in November 2014, the 'Let's Talk About Ilkley' Questionnaire Survey was undertaken from December 2014 to March 2015. A copy of the Questionnaire is provided in **Appendix 2**. This was delivered to every household and copies were left in the Town Hall, the Visitor Information Centre, the Clark Foley Centre and shops, cafes, churches and other publicly accessible places around Ilkley and Ben

Rhydding. A copy of the Key Findings Report is also included in **Appendix 2.**

2.6 The Questionnaire was completed by 1,015 respondents and proved an invaluable source of information for the development of the INDP.

2.7 The key findings were:

- The town retains a strong sense of community. This key social asset, alongside the prodigious environmental assets of the area, needs to be protected and enhanced.
- The key threat to these social and environmental assets is seen to be the level of growth, particularly housing growth proposed for the neighbourhood area.
- Most respondents to the Questionnaire Survey felt that there was already enough housing (49%) or only a need for a little more (41%). Only a very small percentage (5%) felt there was a need for “a lot more housing” as proposed in the Core Strategy.
- A strong view that the type of housing needed was affordable and starter rather than larger, detached homes was expressed and that development should be smaller in size rather than large estates.
- Over 50% of respondents considered housing and shopping in the area to be good; with 40% of respondents considering leisure and schools to be good; but, on the other hand, only just over 10% considered job opportunities to be good.
- Accessing and using the surrounding local countryside, including the Moor, is something that over 70% of respondents do frequently.

3.0 Preferred Option Draft Plan: October to November 2017

27th October to 13th November 2017

3.1 A Preferred Option Draft of the new Ilkley Neighbourhood Development Plan (INDP) was published for informal consultation in October 2017.

3.2 A copy of the document is provided on the NDP pages of the Town Council's website - see <https://towncouncil.ilkley.org/neighbourhood-plan-consultation-1-2019/archived-neighbourhood-plan/> .

3.3 Copies of the plan were available online at <http://parishcouncil.ilkley.org/> and hard copies could be viewed at the following locations:

- Clarke Foley Centre
- Ilkley Town Hall
- Ilkley Library
- Christ Church
- Visitor Information Centre
- Tivoli Café Bar, Ben Rhydding
- Ben Rhydding Methodist Church
- St Johns Church Ben Rhydding

3.4 A response form was provided. This was only a guide and written responses in other formats and on other matters were welcomed. Comments on the Preferred Option Draft INDP were invited in writing by 13th November 2017 and were returned to: Ilkley Town Hall, Station Road, Ilkley, LS29 8HB or by email to: clerk@parishcouncil.ilkley.org.

3.5 Copies of publicity, screenshots of the Town Council's website (archived) and a copy of the Response Form and are provided in **Appendix 3**.

3.6 Based on this consultation the working group clarified the key issues to be addressed in the INDP.

- Provision of new sustainable housing
- Protection of key community facilities
- Protection and enhancement of key environmental assets such as heritage and landscape; especially minimising the loss of local Green Belt
- Sustainability and climate change; ensuring development is sustainable and supports the transition to a zero carbon future in a changing climate
- Car parking, traffic, vehicle use and public transport
- Maintaining Ilkley's role as a destination for shopping and tourism
- Supporting economic growth
- Ensuring Ilkley is a place that is accessible and inclusive

4.0 Preparation of Draft INDP

4.1 By May 2019, the Neighbourhood Plan Working Group had suffered the loss of the two previous leaders of the Working Group. The first was the unexpected death of the Councillor leading the Working Group and the second loss was due to the retirement of the Councillor leading the group at that time. The local elections of May 2019 saw the political complexion of the now Town Council change, with many new councillors taking the

place of former councillors who had either retired or lost their seats in the election.

- 4.2 The newly elected Town Council under the guidance of the new Mayor, was determined to progress the work of the Neighbourhood Plan. Under the leadership of a new Councillor the 2017 plan was revised and revitalised. Enthusiasm and energy to complete the project was refreshed.
- 4.3 Despite changes in leadership the members of the Neighbourhood Plan Working Group have remained largely the same. Two volunteers from Climate Action Ilkley joined the Group in 2018.

5.0 Regulation 14 Consultation: November to December 2019; February to March 2020

7th November to 19th December 2019 and 18th February 2020 to 30th March 2020

- 5.1 The public consultation on the Ilkley Draft Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

- 5.2 The Draft Plan was published for formal Regulation 14 public consultation for 6 weeks from 7th November 2019 to 19th December 2019 and for another 6 weeks from Tuesday 18th February 2020 to Monday 30th March 2020.
- 5.3 The Regulation 14 public consultation took place in two phases due to a misunderstanding about which statutory consultees and local bodies should be approached. This error was realised part way through the November/December consultation.
- 5.4 When the Draft INDP was first published for formal public consultation from 7th November 2019 to 19th December 2019 residents and some local bodies and statutory consultees were consulted.
- 5.5 Professional advice from the Planning Authority was sought and the Town Council was assured that a two stage consultation process was acceptable, to allow all consultees at least the minimum 6 week consultation period to respond.
- 5.6 For the second phase of the consultation (Tuesday 18th February 2020 to Monday 30th March 2020), consultees were contacted by email. The second phase targeted those statutory and local bodies who had not been contacted and invited to respond in the November to December 2019 formal consultation. The second phase was publicised on the Town Council's website and residents, local bodies and statutory consultees were encouraged to respond.
- 5.7 In August and September 2019, prior to the Regulation 14 consultation, CBMDC were asked to provide feedback on the draft INDP. A copy of these comments and recommended amendments to improve the plan can be seen in **Appendix 4**. Due to this engagement CBMDC did not comment during the Regulation 14 consultation.
- 5.8 In August 2019 a copy of the draft INDP was sent to the Centre for Sustainable Energy (CSE) www.cse.org.uk for assessment using their 'How Green is my Plan? (Rural)' criteria and feedback was provided with reference to CSE's document 'Neighbourhood Planning in a Climate Emergency' (2020). This assisted the INDP Working Group in responding appropriately to the concerns of some members of the group and wider community about the adequacy of the INDP to mitigate the climate crisis.

- 5.9 The content of the Draft INDP was not changed between the first and second phases of the formal Regulation 14 public consultation.

Regulation 14 Public Consultation Phase 1, 2019

- 5.10 Three public drop-in sessions and a public meeting were held and were publicised in the local press, on the town council's website and through community groups (**Appendix 5**). The Public meeting was on Friday 29th November, from 7 to 8pm at the Clarke Foley Centre where a presentation was given by way of introduction and explanation. The content of the INDP was displayed around the room under each objective to enable people to read and comment on the response sheets. Large copies of the Policies Map and supporting documents were available for reference. Town Hall drop-in sessions ran from 10:00am to 12 noon on:
- Thursday 14th November
 - Monday 18th November
 - Wednesday 4th December

A copy of the Powerpoint presentation is provided in **Appendix 5**.

- 5.11 Hard copies of the Draft INDP could be viewed at the Town Hall, the Library, Clarke Foley Centre, Christchurch, Ben Rhydding Methodist Church and St John's Church Ben Rhydding.
- 5.12 Screenshots from the Town Council's NDP webpages are provided in **Appendix 5**.
- 5.13 The Draft Plan and accompanying documents were placed on the Town Council website: <https://towncouncil.ilkley.org/neighbourhood-plan-consultation-2/> .
- 5.14 Hard copies of the documents were available on request and stakeholders were invited to make an appointment if they wanted to ask questions of the INDP team outside of the drop-in times by contacting the Deputy Clerk on deputyclerk@towncouncil@ilkley.org .

Cllr Ros Brown gave a presentation about the INDP to Ilkley Business Forum members at their request.

Regulation 14 Public Consultation Phase 2, 2020

- 5.15 The second phase of the consultation was communicated using the Town Council's website - see **Appendix 6**.

- 5.16 A copy of the Response Form is provided in **Appendix 6**.
- 5.17 The list of consultation bodies and other organisations contacted (including those provided by the Senior Planning Officer, Local Plan Team CBMDC) together with a copy of the email letter is provided in **Appendix 6**.
- 5.18 Taken together both phases resulted in 119 responses from members of the public, local community groups and statutory bodies. These responses were generally supportive with a number of helpful suggestions being made.
- 5.19 **Summary of *Consultation Bodies* responses and how the INDP was amended**

The main consultation comments related to the following:

- Comments noted but not resulting in amendments include comments of general support for/objections to policies, observations on and questions about policies and suggestions for future planning and non-planning matters and non-INDP related matters or those lying outside the remit of the INDP
- More robust justifications made in INDP to support walking and cycling, de-centralised renewable energy, creative/heritage participation, and reduce car use. More robust justification for inclusion of Wheatley Lane Recreation Ground in Local Green Space Assessment
- Changes to policy wording to improve conformity with national and local policies, national, district and town Climate Emergency Declarations, projects and community actions (e.g. creative/heritage hub; solar panel installation project; community fete; sports activities)
- Comments requesting stronger language to ensure the INDP is supportive of the town council's Climate Emergency Declaration have been noted but more prescriptive language is not acceptable at examination however stronger justifications have been made where possible

Summary of *residents'* responses and how the INDP was amended

The main consultation comments related to the following:

- Minor amendments to policies and supporting text and Local Green Space Assessment to correct factual information and provide clarity
- Comments noted but not resulting in amendments include general support for and objections to policies, questions about policies and suggestions for future planning and non-planning or non-INDP related matters

- More robust justifications made to support walking and cycling, decentralised renewable energy, sustainable multi-modal transport, zero carbon housing standards, provision of affordable/starter homes/self and custom builds and social and co-housing, high quality and sustainable housing design, flood prevention, biodiversity, protection of playgrounds and heritage and recreation features, zero carbon standards in line with national and local Climate Emergency Declarations, town wide 20mph zones and road safety, community food growing and allotment provision and reduce car use.
 - Comments requesting stronger language to secure gains in many of the above areas (especially climate change mitigation, zero carbon standards/building regulations and affordable housing) noted but not able to amend as more prescriptive language is not acceptable at examination
 - Changes to policy wording to improve conformity with national and local policies, national, district and town Climate Emergency Declarations, projects (e.g. Wharfedale Greenway) and community actions (e.g. community fete and orchards)
 - Amendments to the Policies Map to improve accuracy, clarity and extend a Green Corridor
 - Addition of two sites to Local Green Spaces policy
- 5.20 Two responses were received from developers/landowners these comments included a mix of supporting comments and observations and suggestions for amendments to policies for housing, Green Belt and Local Green Spaces. These comments were noted but the INDP is considered to reflect accurately national and strategic planning policy. As a result no substantial changes were made to the INDP based on these responses.
- 5.21 The complete response tables setting out the detailed comments, how these were considered and how the Submission Plan has been amended are provided in **Appendix 7**.
- 5.22 The submission INDP was further strengthened to address the significant number of comments requesting more ambitious standards in relation to addressing the climate and biodiversity crises. (However, this is still an area where the Town Council and many respondents would like to go further than the current national and district legislation allows.)

Appendix 1: Public Meeting, November 2014

Article in the Ilkley Gazette

4th December 2014

Ilkley Neighbourhood Plan meeting draws a crowd

By Amanda Greaves



Residents pack into the Clarke Foley Centre for the meeting called by Ilkley Parish Council about the Neighbourhood Plan

DOZENS of Ilkley residents responded to a call by Ilkley Parish Council to get involved in a plan which could protect the town against over-development and lead to much-needed facilities.

People packed into a meeting at the Clarke Foley Centre last Thursday night as part of a public engagement exercise for the formulation of an Ilkley Neighbourhood Plan.

The Neighbourhood Plan will contain a vision for improving Ilkley. It will suggest the provision of new facilities, as well as the allocation of key sites for special kinds of development.

It is hoped the plan will eventually work alongside the Bradford District Local Plan, providing a rule book for planners to make decisions on applications for building houses or businesses premises.

The parish council is also encouraging residents to speak out about the types of development they would find more acceptable.

Councillor Paul Kitching stressed the Neighbourhood Plan itself will not challenge the numbers of houses being proposed in Bradford Council targets – but will give people the chance to choose the types of housing they want built, density of developments, and could direct spending on the infrastructure of facilities needed to meet the needs of a growing population.

He told the meeting: “What we’re talking about is is Ilkley going to be a good place to live in 20 years’ time?”

“We’re at the beginning of quite a long road, that’s going to take about 15 months.”

Members of Ilkley Parish Council have drawn together a panel of experts in recent years to look at issues around the town, ranging from planning and housing to leisure facilities, transport, employment and education provision.

Some of these experts also attended last Thursday’s meeting, and smaller groups of residents were encouraged to discuss and raise points they want to see taken into consideration for the plan.

Threats to the green belt and an influx in the building of new homes were chief worries among those who attended the meeting, with some saying they do not want to see large estates of large houses built, and questioning if new homes could genuinely be made affordable.

The strain on the general infrastructure of Ilkley as a result of new housing developments, and need for more schools places as a direct result, was also a topic of concern.

Tony Emmott, of Ilkley Design Statement Group, urged residents to get involved in the Neighbourhood Plan now.

He said: “Now is the time to put your comments forward, not when the planning applications are put in in future, and certainly not when the bulldozers appear in the fields behind your house.”

Questionnaires have been distributed to homes across town, and can also be completed online at the website weneedtotalkaboutilkley.com. Feedback from the study is expected to be presented in February.

Appendix 2: Let's Talk About Ilkley Questionnaire Survey, December 2014 to March 2015

Copy of Questionnaire

What is the Neighbourhood Plan and why should I get involved?

.....

Ilkley Parish Council is seeking to create a Neighbourhood Plan which helps explore how to provide much-needed local housing, support high street shops, develop local job opportunities and provide local amenities that meet the needs of our local community

The Neighbourhood Plan provides you with the opportunity to identify key issues for Ilkley and shape how future planned growth will look and where it might go, but it is not a tool to stop development.

The Neighbourhood Plan will bring the community together to share ideas and build consensus about needs and priorities for Ilkley. The Plan is important for everyone!
Ilkley residents must vote at a referendum to adopt it and if people vote in favour it will then become a legal document whereby any decisions on future planning applications will be required to be made in accordance with the Neighbourhood Plan.

This is your opportunity to make your views known. Please fill in this form as fully as possible.

.....

Completed, returned forms will be entered into a prize draw for a Booths luxury food hamper worth £100.00

.....

Please ensure you fill in your details below.
Questionnaire overleaf

Name: _____

Address: _____ Tel: _____

_____ Gender: Male Female

Were you born in Ilkley? Yes No

How long have you lived in Ilkley? _____

How many people are in your household? _____

Which best describes your living arrangements?
I rent my property I own my property

How old are you? 11-19 20-29 30-49 50-64 65+

Are you (tick all that apply)

Employed part time (less than 30hrs per week) Employed full time (more than 30hrs per week)

Unemployed Self-employed If self-employed do you work from home Yes No

Student Family Carer Unwaged housewife/husband Retired

Do you consider yourself to be disabled? Yes No Prefer not to say

Do you consider yourself to be long term sick? Yes No Prefer not to say

Is anyone in your household's day to day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?
Include problems related to old age.

Yes, limited a lot Yes, limited a little No

The information you provide will be treated in the strictest confidence in accordance with the Data Protection Act 1998.

What is the Neighbourhood Plan and why should I get involved?

.....

Returning Your Form - Prize Draw

Please return this form by posting in one of the sealed black boxes you will find around town. These are located in:
The Town Hall, the Library, the Supermarkets and The Clarke Foley Centre.

It would help the exercise if you would be prepared to fill in all the information inside. The council is committed to keeping your information private and secure.

This form is also available online at:
www.parciscouncil.org

Completed, returned forms will be entered into a prize draw for a luxury Booths Food Hamper. Please ensure you fill in your name and address overleaf.

Closing Date - 31st December 2014



Ilkley Parish Council, Town Hall, Station Road, Ilkley, West Yorkshire LS29 8HB
Tel: 01943 436212 • Email: ilkley@pariscouncil.gov.uk • www.parciscouncil.org

Ilkley Neighbourhood Plan Questionnaire

Life in Ilkley

1. What do you like about Ilkley?

2. What do you dislike about Ilkley?

3. What changes or improvements would you like to see in the town?

4. What issues or needs do you think the Neighbourhood Plan should address?

5. Which of the following applies to you? *Tick all that are relevant.*
 Live in Ilkley Work in Ilkley Shop in Ilkley Active in a local community group

6. How strong is the sense of community in Ilkley?
 Very Quite Average Not Strong Weak

Housing

7. Is there sufficient housing in the town?
 A lot more needed A little more needed Enough Too much

8. Is there a lack of a particular type of housing in the town?

	Yes	No	Not Sure
Detached Houses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Private Rented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Council/Housing Association	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Elderly Housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Starter Homes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Affordable Housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. If additional housing were to be built which would you prefer?
 One large estate A number of smaller developments
 Individual released plots Garden infill development

10. How much do you agree or disagree with each of the following statements?

I would welcome some development in Ilkley if it meant facilities were improved.
 Completely agree Somewhat agree Neutral Somewhat disagree Completely disagree

I would welcome development if it meant that there was an increase in affordable housing.
 Completely agree Somewhat agree Neutral Somewhat disagree Completely disagree

I would not welcome any further development in the town under any circumstances.
 Completely agree Somewhat agree Neutral Somewhat disagree Completely disagree

I would prefer to see a series of smaller developments around the town rather than a single large one.
 Completely agree Somewhat agree Neutral Somewhat disagree Completely disagree

Facilities

11. For each of the following which do you think best describes current provision?

	Excellent	Good	Average	Poor	Inadequate
Housing	<input type="checkbox"/>				
Shopping	<input type="checkbox"/>				
Leisure	<input type="checkbox"/>				
Job Opportunities	<input type="checkbox"/>				
Schools	<input type="checkbox"/>				
Childcare	<input type="checkbox"/>				

12. Which local facilities do you use?

	Frequently	Occasionally	Never
Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hospital	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Doctors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dentists	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Library	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Lido	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks/Play Areas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Local Shops	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leisure Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

13. If you go outside of Ilkley for some facilities, what facilities do you use?
 Facility Location

14. What facilities are missing / inadequate in Ilkley?

Environment

15. How would you rate the general environment in Ilkley?
 Good Average Bad

16. What in particular do you like?

17. What in particular don't you like?

18. How often do you use Ilkley Moor or surrounding countryside for recreation?
 Often Occasionally Infrequently Never

19. Are there any sites/locations in Ilkley that give you cause for concern?
 Please tell us where and why.

20. How do you feel about crime and anti-social behaviour in the town?
 I feel safe from crime/anti-social behaviour I feel unsafe

Transport

21. How do you get about Ilkley?
 Car Bus On Foot Motor Cycle Bicycle Taxi

22. Are there any transport/travel issues that cause you concern?
 For example condition of roads, pavements, parking, highway safety, cycling provision.

Employment

23. What do you think of the job opportunities in Ilkley?
 Excellent Good Average Poor Very Poor

24. If poor or very poor, why do you think this is?

25. If you could change one thing about Ilkley what would it be?

26. What do you think are the 3 main things the neighbourhood plan should look at?

Copy of Key Findings Report

We Need To Talk About Ilkley

Key results from the Neighbourhood Plan Survey on a page (May 2015)

Who took part?

- 1015 people responded 95% lived in Ilkley 19% worked here

What did they like most about Ilkley?

- The countryside, setting and views. They liked the moor, the river and the dales particularly.
- The sense of community, the friendliness and the size
- The facilities, particularly the independent shops and the good schools
- The cleanliness and safety

What did they like least?

- The parking problems: not enough parking space, inconsiderate parking & the lack of parking for commuters and visitors
- Traffic congestion
- The high number of charity shops
- That roads were not safe enough for people, particularly children, to cycle on
- Poor school facilities and a lack of school places, particularly at the grammar school

Housing

A lot of people were worried about housing and housing development. Just over half who mentioned it thought there was enough housing in Ilkley but some thought there was not enough. 41% thought a little more housing was needed and 5% a lot more.

People who thought more housing was needed thought that houses in Ilkley were too expensive. Even people who thought there was enough housing said they'd prefer any housing built here to be affordable and/or starter homes, not detached houses.

People wanted more infrastructure if houses are to be built and many were worried about the impact on school places. They also said that if houses are built they would rather see a number of small developments rather than a big estate.

Things they'd like improved

- More parking facilities and parking controls on the streets
- Better traffic control to manage flow or limit traffic, particularly on the Grove
- School buildings/ a new school /expanded schools
- A cinema
- Better indoor sports & leisure facilities, particularly an indoor swimming pool, leisure centre and gym
- Better facilities and safer routes for cycling

We need to talk about Ilkley

Preliminary report on the findings of the survey conducted by Ilkley Parish Council in connection with the development of the Ilkley Neighbourhood Plan
May 28th 2015

The survey was conducted to inform the development of the Neighbourhood Plan for the town. A total of 1015 people took part of whom 95% lived in Ilkley and 19% worked here. In addition to a variety of 'closed' fixed alternative or rating scale items it included a large number of open ended questions which enabled participants to express a wide range of views. In this summary we have focussed on the most common responses to these and added information from the closed questions to flesh out details. A more detailed report which gives a full account of responses to closed questions and includes information about the way the survey was conducted, the profile of respondents and a copy of the survey itself will be published soon.

Questions and principal responses

Question 1: What do you like about Ilkley?

Taken collectively the things that respondents appeared to value most about the town related to the natural environment; the surrounding countryside, its proximity to the moor and its setting and views. A total of 422 people mentioned one or more of the following: the countryside (185) the dales (67) and the rural nature of the area (26). A further 144 mentioned the setting, surroundings, views and/or scenery which indicates that, in addition to general access to the countryside, local people and visitors value the visual connection that exists between the town and the landscape; 111 said the town or its setting were 'beautiful' and more ambiguously a further 60 said they liked its location. Proximity to Ilkley Moor was mentioned by 193 people and when asked to rate how often they used the Moor or surrounding countryside for recreation 72% said 'Often' and only 1% 'Never'.

People also highlighted the sense of community and/or the friendliness of the people (223 respondents) while the third most common cluster of answers showed the value placed on the current small size of the town. 172 people said they liked the fact that it is small, a further 60 said they liked its size and 30 mentioned its compactness or 'village' feel.

Responses to Question 6: 'How strong is the sense of community in Ilkley?' provide further evidence that many people feel that Ilkley is special in this regard, 27% rated it as 'Very strong' and a total of 67% as above average. Only 5% gave ratings indicating that they believed it to be below average. 41% of respondents recorded that they were active in a local community group.

Other features that were valued included: facilities (129), safety (64), schools (55), independent shops (54), connectivity and/or proximity to Leeds and Bradford and the town centre. Responses to rating scales in the survey were consistent with this: 69% rated shopping in the town 'good' or 'excellent' while 53% gave leisure and 52% gave schools higher than average ratings. When asked which local facilities they actually used 79% of respondents said they shopped in Ilkley, (but paradoxically 91.5% said they used local shops frequently!); 15% said they used the lido frequently (46% occasionally) and 38% said they used leisure facilities frequently (48% occasionally). However, some other facilities that were not mentioned much in open responses did appear to be heavily used by local people. These include: the Library with 28% saying they use it frequently and 51% occasionally and parks/play areas (46% frequently and 45% occasionally). People were also asked to rate local job opportunities and childcare, 71% rated job opportunities average or above average and 90% rated childcare average or better than average.

Question 15: How would you rate the general environment in Ilkley and**Question 16: What in particular do you like?**

On a three point scale 91% of respondents rated the environment in Ilkley 'Good' (the highest option) and less than 1% rated it 'Poor'.

A high proportion of respondents (160) skipped question 16 presumably because they felt their earlier answers had covered it. However, the overwhelming majority of responses focussed on the pleasantness of the green spaces and planting/trees within the town, the pleasure of walking through the town or of walking in the immediate vicinity such as along the river and on the moor. Others mentioned the cleanliness and/or neatness.

Question 2: What do you dislike about Ilkley?

When it came to what was disliked an overwhelming number of responses focussed on parking or congestion or the amount of traffic generally, 419 respondents mentioned problems with parking that ranged from the general shortfall to specific issues such as parking on pavements. A total of 89 people mentioned problems with the levels of traffic, flow management and or congestion of whom 48 had not mentioned parking. 37 people specifically mentioned congestion on the A65. This gives a total of 467 people expressing concerns about traffic.

The second area of concern was the large number of charity shops (106 respondents) with some respondents focussing on the associated loss of commercial retail outlets. Worries regarding the loss of general retail outlets through conversion to cafes/coffee bars and restaurants were also evident in 12 responses. A total of 44 respondents mentioned the need for cleaner streets (less litter, dog mess and rubbish).

Housing was also mentioned relatively frequently (67 times). However, opinion appears to be roughly divided between those who think it is too expensive and/or there is a need for more affordable housing (37) and those who are concerned about overdevelopment generally (16), development without infrastructure or on green fields (9) or the prospect of more affordable housing in the town (5). In total 30 people expressed concerns regarding more building.

This division of opinion was also apparent in responses to direct questions about housing. When asked directly whether there is sufficient housing in the town (Question 7) 49% said yes, 41% said that a little more was needed, 6% said there was too much and 5% said a lot more was needed. When asked whether there is a lack of particular types of housing 60% of respondents ticked 'Starter homes', 64% 'Affordable housing' and 29% 'Council/housing association'. By contrast only 8% thought there were too few detached houses, only 11% too few private rented homes and only 16% too few specialist properties for the elderly. When the question 'if additional housing were to be built which would you prefer?' was posed the majority preference was for 'a number of smaller developments' (64%) as opposed to 'one large estate' (3%), 'individual released plots (26%) or 'garden infill' (7%). The skewing in favour of smaller developments was even more evident when people were asked to rate how much they agreed with the statement 'I would prefer to see a series of smaller developments around the town rather than a single large one'; 47% agreed 'Completely' and 34% 'Somewhat' agreed, only 11% disagreed.

Responses to rating options (Question 10) in relation to housing development were also broadly consistent with responses to open questions when it came to affordable housing and infrastructure requirements (see chart overleaf).

Question 10 – How much do you agree or disagree with the following statements?					
	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Completely agree
I would welcome some development in Ilkley if it meant facilities were improved	12.45%	12.13%	12.02%	38.83%	24.57%
I would welcome development if it meant that there was an increase in affordable housing	16.40%	9.65%	20.04%	30.55%	23.37%
I would not welcome any further development in the town under any circumstances	28.97%	24.25%	19.21%	15.02%	12.55%

Concerns other than those above included a lack of facilities (53) or underinvestment in facilities (the need for more investment in the Lido came up 20 times and the lack of toilets 13 times). 25 people said they would like a cinema. These themes came up even more strongly in responses to subsequent questions where people were asked about specific changes they would like to see (see below).

Question 17: What in particular don't you like?

This was another question that was skipped by a substantial number of people (only 746 responded). It provided an opportunity to give some detail about areas of concern but the answers were so varied and specific as to defy simplistic analysis. Two issues that were raised more than others (apart from traffic and parking), however, were litter and dog fouling on the Moor and in the streets (82 references to rubbish or litter and 32 to dog fouling/poo/mess) and 'the A65' (30 references but most didn't give any details).

Question 3: What changes or improvements would you like to see in the town?

This elicited a wide variety of responses, however, issues with parking (419 responses) and traffic flow/congestion and safety (89 general responses, 33 calls to pedestrianize the Grove and 19 calls for a by-pass) were raised more than others. Cycling promotion and improving opportunities for cycling and the safety of cyclists were mentioned by 81 people with many comments drawing attention to cycling as a transport option.

Suggestions relating to improved/additional leisure and sports facilities (excluding cycling) were made by 236 respondents with references to a cinema, a new/improved swimming pool and gym/sports facilities being the most common at 74, 63 and 50 respectively. These facilities were also highlighted even more in response to Question 14 'What facilities are missing/inadequate in Ilkley?' 280 people suggested a cinema, 180 a gym/leisure centre or indoor sports facility and 180 a better or heated lido/indoor pool. Although there was some overlap between calls for a gym and calls for better swimming facilities many respondents suggested one without mentioning the other therefore demand for a leisure centre that includes a heated indoor swimming pool may be very high.

People were also concerned about the shortage of school places in Ilkley and the run-down facilities, particularly at the grammar school with 87 responses, a number of which raised concern regarding the potential impact of further housing development in the town.

A total of 67 responses to Question 3 related to housing but, as with Question 2 above, these were split between those in favour and those against development. Only 2 people simply called for more housing while 36 wanted more affordable housing or wanted new-build limited to affordable. A further 18 said there should be more control over the amount and where it was built, including asking for infrastructure improvement as a condition and 11 were opposed to any new development.

Question 4: What issues or needs do you think the Neighbourhood Plan should address?

Question 26: What do you think are the three main things it should look at?

In answering both questions the principal issues people said they thought the Neighbourhood Plan should address were: parking and traffic generally (314 re parking and 113 re traffic in Q4) housing/housebuilding (248 responses including statements for and against in Q4) and the provision of school places (175 in Q4).

Question 20: How do you feel about crime and anti-social behaviour in the town?

This was a fixed alternative question. 95% of respondents ticked 'I feel safe from crime/anti-social behaviour' and only 5% ticked 'I feel unsafe'. This is consistent with responses to open-ended questions.

Question 22: Are there any transport/travel issues that cause you concern?

For example: condition of roads, pavements, parking, highway safety, cycling provision?

As one would expect from responses to other questions issues relating to parking and cars were raised by a large number of respondents but this question also prompted a large number of responses highlighting the lack of safe cycling routes/cycling lanes and the poor condition of roads.

Question 23: What do you think of the job opportunities in Ilkley?

Question 24: If poor or very poor why do you think this is?

76% of respondents rated job opportunities average (58%) or above average (19%). The majority of the 24% who rated them 'poor' or 'very poor' drew attention to the fact that many of the jobs available in the town itself are in low skill and low pay sectors such as home care and retail and/or that people need to commute to get higher skill jobs which deliver the salaries required to pay for housing in Ilkley.

Question 24: If you could change one thing about Ilkley what would it be?

Responses to this were very much in line with those to earlier questions.

Summary

The people participating in this survey were very positive about Ilkley. They value its environment; the landscape and setting and the green spaces, parks, trees and flowerbeds within the town. They also appreciate the quality of the schools, the safety of the streets and the strength of the community.

However, a significant number want improved parking and better traffic control/flow and better maintenance of roads. There are concerns regarding school buildings and capacity, particularly at the Grammar School. In addition many people would like new facilities such as a leisure centre, indoor/heated swimming pool or cinema and many would like to have better provision and safer roads/routes for cyclists. People are concerned about housing and new development but opinion is divided on the matter. Those in favour of development would generally like it to be affordable and on small sites and there are particular concerns about the impact of new housing on the demand for school places.

Appendix 3: Preferred Option Draft Plan October 2017, Copies of publicity

Copy of Flyer

Help Shape the Future of Ilkley

Ilkley Neighbourhood Development Plan

Preferred Option Consultation 2017

Ilkley Parish Council (IPC) needs your help to finish the preparation of Ilkley's new Neighbourhood Development Plan (INDP for short). This leaflet explains what is happening and how you can get involved.

The INDP is a new type of plan which allows local people to help shape the future development of Ilkley. Our draft NDP has been produced by Ilkley Parish Council. The INDP has been prepared by a team of parish councillors and committed local residents lead by Cllr Brian Mann. We have also employed a specialist consultant. Within the next 12 months the plan will be put to a referendum of all Ilkley voters for a final decision.

The NDP aims to establish a set of Ilkley Neighbourhood Development Policies (INDPs) which will manage, promote and control the use of our land.

We want as many people as possible to get involved in preparing the INDP. This leaflet and the meetings we are arranging are part of that process.

This leaflet contains only a taster of what is in the full INDP. The full Plan gives greater detail on the policies and the sites we are seeking to protect or put forward for development. It also has a Policies Map showing allocated and protected sites.

The full Plan and the associated map are available at parishcouncil.ilkley.org/. The INDP is a long and interesting document and we urge you to read it fully. You will see when you read the Plan that we explain each Policy in detail and that we ask a number of questions about the policies which we would encourage you to consider and answer. **So get involved!**



Green Belt Review

CBMDC will soon begin a review of the Green Belt. Tell us what you think about this. Help the Parish Council form the town's response to this huge change affecting Ilkley's future.

ILKLEY NEIGHBOURHOOD PLAN KEY FACTS

What is a Neighbourhood Development Plan? A new type of development plan that allows local people to come together to help shape the future of the area.

Who prepares the plan? Everyone can get involved, but the body responsible for making sure everything comes together is Ilkley Parish Council.

Who makes the final decision on what goes in the plan? We all do. The plan must be put to a local referendum of all people eligible to vote in Ilkley.

How long will it take to prepare the plan? From where we are now until the referendum, we hope 12 months.



Ilkley Parish Council

There are five main strands to the draft plan covered by the following subjects. Here they are showing the policy headings in the draft Plan.

Get a copy of the full INDP at parishcouncil.ilkley.org/ to find out more.

1. General policies applicable to all development.

INDP1	New Housing Development in Ilkley	INDP6	Encouraging High Quality and Sustainable Design
INDP15	Transport	INDP23	Meeting the Needs of All

HAVE WE IDENTIFIED THE CORRECT GENERAL POLICIES FOR ILKLEY?

2. Policies allocating land allocated for development

INDP2	Housing Site Allocations	INDP22	Economy and Employment
-------	--------------------------	--------	------------------------

TAKE A LOOK AT THE FULL INDP AND TELL US IF YOU THINK WE HAVE ALLOCATED THE CORRECT SITES? ARE THERE SITES WE HAVE MISSED THAT YOU THINK COULD BE ALLOCATED?

3. Policies Protecting the Assets of the Town

INDP3	Community Facilities	INDP4	Recreation Facilities
INDP5	Allotments and Community Gardens	INDP11	Local Green Spaces
INDP12	Green Corridors	INDP13	Landscape Character
INDP14	Biodiversity	INDP17	Leisure and Tourism
INDP19	Public Realm and Art		

WE WANT TO KNOW YOUR VIEWS ARE WE PROTECTING THE KEY FEATURES THAT MAKE ILKLEY A GREAT PLACE TO LIVE AND WORK?

4. Policies for the Conservation Areas

INDP7	General Principles	INDP8	Ben Rhydding Conservation Area
INDP9	Ilkley Conservation Area	INDP10	Middleton Conservation Area

SHOULD THE INDP HAVE POLICIES TO PROTECT THE CONSERVATION AREAS? IF YOU AGREE TAKE A LOOK AT THE FULL PLAN AND LET US KNOW WHAT YOU THINK OF OUR DRAFT POLICIES?

5. Policies for some of the Town's Key Issues

INDP16	Walking and Cycling	INDP18	Ilkley Town Centre
INDP20	Shopfronts	INDP21	Traffic and Car Parking

GET INVOLVED TELL US WHAT YOU THINK ABOUT THE DRAFT POLICIES FOR THESE KEY ISSUES?

REMEMBER THIS IS JUST A TASTER OF WHAT IS IN THE INDP. GET HOLD OF A COPY OF THE INDP AND A COMMENT FORM AND TELL US WHAT YOU THINK BY VISITING parishcouncil.ilkley.org/

Website announcement

Ilkley Neighbourhood Development Plan Preferred Option Consultation 2017

**PLEASE COME ALONG TO OUR OPEN EVENT AT ILKLEY TOWN HALL
ON FRIDAY 27TH OCTOBER 5PM – 9PM OR ON SATURDAY 28TH
OCTOBER 10AM – 4PM**

Ilkley Parish Council (IPC) needs your help to finish the preparation of Ilkley's new Neighbourhood Development Plan (INDP for short). This leaflet explains what is happening and how you can get involved.

The INDP is a new type of plan which allows local people to help shape the future development of Ilkley. Our draft NDP has been produced by Ilkley Parish Council. The INDP has been prepared by a team of parish councillors and committed local residents led by Cllr Brian Mann. We have also employed a specialist consultant. Within the next 12 months the plan will be put to a referendum of all Ilkley voters for a final decision.

The NDP aims to establish a set of Ilkley Neighbourhood Development Policies (INDPs) which will manage, promote and control the use of our land.

We want as many people as possible to get involved in preparing the INDP. This leaflet and the meetings we are arranging are part of that process. This leaflet contains only a taster of what is in the full INDP. The full Plan gives greater detail on the policies and the sites we are seeking to protect or put forward for development. It also has a Policies Map showing allocated and protected sites.

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There are five main strands to the draft plan covered by the following subjects. Here they are showing the policy headings in the draft Plan.

Get a copy of the full INDP [HERE](#) to find out more.

1. General Policies applicable to all development

INDP1	New Housing Development in Ilkley	INDP6	Encouraging High Quality and Sustainable Development
INDP15	Transport	INDP23	Meeting the Needs of All

Have we identified the correct general policies for Ilkley?

2. Policies allocating land allocated for development

INDP2	Housing Site Allocations	INDP22	Economy and Employment
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Take a look at the full INDP and tell us if you think we have allocated the correct sites? Are there sites we have missed that you think could be allocated?

3. Policies Protecting the Assets of the Town

INDP3	Community Facilities	INDP4	Recreation Facilities
INDP5	Allotments and Community Gardens	INDP11	Local Green Spaces
INDP12	Green Corridors	INDP13	Landscape Character
INDP14	Biodiversity	INDP17	Leisure and Tourism
INDP19	Public Realm and Art		

Are we protecting the key features that make Ilkley a great place to live and work?

4. Policies for the Conservation Areas

INDP7	General Principles	INDP8	Ben Rhydding Conservation Area
INDP9	Ilkley Conservation Area	INDP10	Middleton Conservation Area

Should the INDP have policies to protect the conservation areas? If you agree take a look at the full plan and let us know what you think of our draft policies.

5. Policies for some of the Town's Key Issues

INDP16	Walking and Cycling	INDP18	Ilkley Town Centre
INDP20	Shopfronts	INDP21	Traffic and Car Parking

Tell us what you think about the draft policies for these key issues.

This is just a taster of what is in the INDP. The full plan is available here.

THE POLICIES MAP IS AVAILABLE TO VIEW HERE.

THE POLICIES MAP KEY IS AVAILABLE TO VIEW HERE.

THE PLANNING POLICY IS AVAILABLE TO VIEW HERE.

Copy of Flyer

The flyer features a green header with the text 'ILKLEY NEIGHBOURHOOD PLAN CONSULTATION' in white. Below this is a large white area with the main title '‘Calling all Ilkley Residents’' in a large, bold, black serif font. Underneath the title, the text 'Let’s talk about Ilkley' and 'Tell us what you think' is written in a smaller, bold, black serif font. This is followed by 'OPEN EVENT' in a bold, black, all-caps sans-serif font. The dates and times are listed: 'Friday October 27th 5pm – 9pm' and 'Saturday 28th October 10am – 4pm'. The location is given as 'at Ilkley Town Hall, Station Road, Ilkley, LS29 8HB'. At the bottom left, there is a green silhouette of a landscape with the text 'we need to talk about' above the word 'ilkley' in a lowercase serif font. Below this are icons for Facebook and Twitter, followed by the website address 'www.parishcouncil.ilkley.org' in a lowercase serif font.

**ILKLEY NEIGHBOURHOOD PLAN
CONSULTATION**

**‘Calling all Ilkley
Residents’**

**Let’s talk about Ilkley
Tell us what you think**

OPEN EVENT

**Friday October 27th 5pm – 9pm
Saturday 28th October 10am – 4pm**

**at
Ilkley Town Hall, Station Road,
Ilkley, LS29 8HB**

we need to talk about
ilkley

  www.parishcouncil.ilkley.org

Copy of letter sent to local schools

NB Copies also sent to the following schools:

All Saints C of E
Ben Rhydding Primary School
Ilkley Grammar School
Moorfield School
Moorview School
Sacred Heart Catholic Primary

Mr A Soutar
Ashlands Primary School
Leeds Road
Ilkley,
LS29 8JY

Dear Mr Soutar

Re Ilkley Neighbourhood Development Plan
Land required for educational purposes

As you will be aware, Ilkley Parish Council is in the process of preparing a Neighbourhood Development Plan (the Plan) for the town. The purpose is to make sure that the limited land available for development in Ilkley is used in the best way for the benefit of the town.

One of the factors to be considered is the availability of land for the expansion of schooling requirements associated with the increase in the population of the town between now and 2030.

The consultant assisting us has asked that we write to all the schools within the boundaries of the town namely all the primary schools, Ilkley Grammar School and Moorfield School, to ask the following questions:

- 1 Do you expect to have to increase the size of the school premises between now and 2030?
- 2 Do you already have land available for that purpose and if so approximately how much (in square metres or hectares)? If so, please could you indicate this on a Google earth picture or map.
- 3 Is the land available sufficient for your expected purposes?
- 4 Is there any land adjacent to your school and which you do not own but which you consider would be useful for you to acquire for the purposes of expansion of your facilities? If so, please could you indicate this on a Google earth picture or map.

- 5 Are you likely to have to look elsewhere for land to be used for the purposes of expansion of the school?
- 6 Do you already have any projections for the number of pupils in your school between now and 2030? Please could you provide these to us?

We are hoping to include this information as part of one of the policies in the Plan and would be obliged if you could reply by July 3rd so that we can provide the information to our consultant in time for a meeting shortly thereafter.

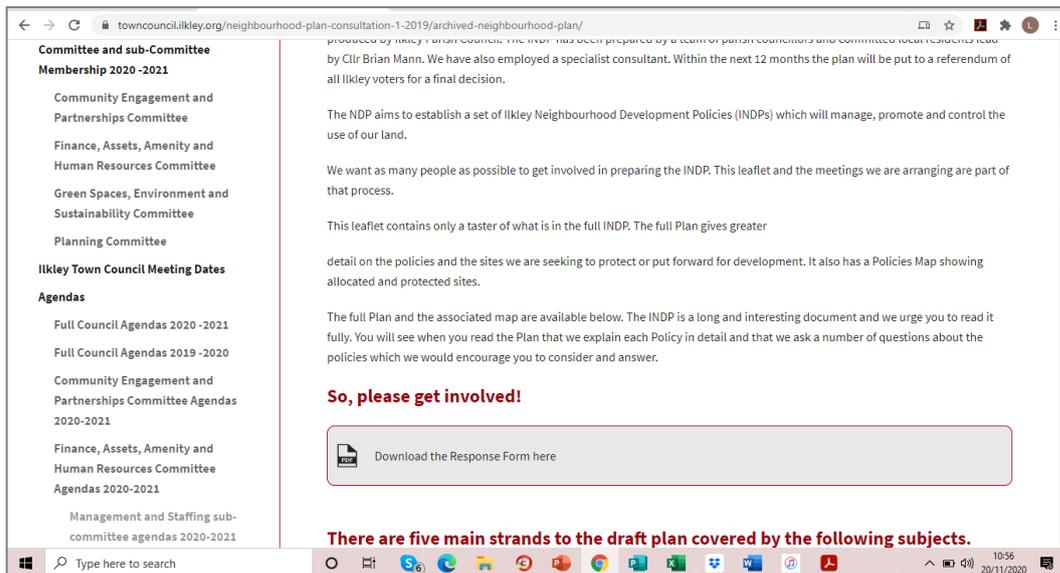
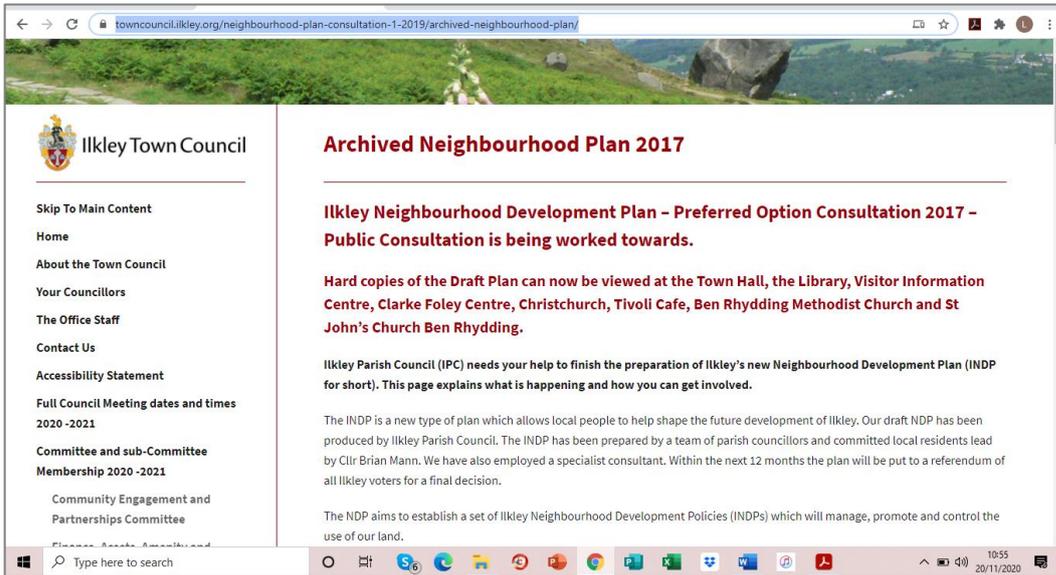
The Plan will also be subject to public consultation in the near future.

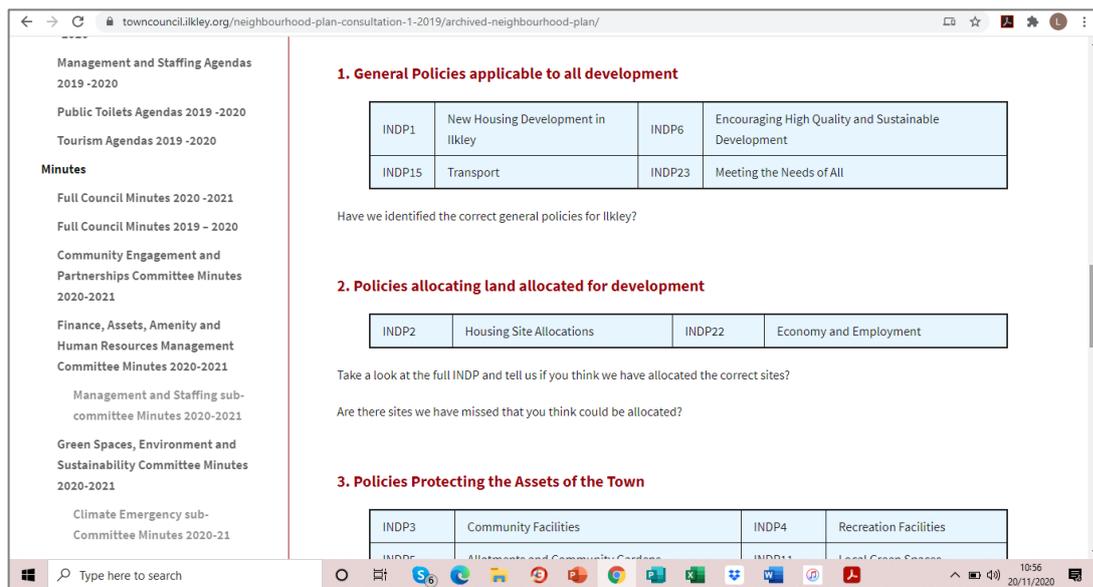
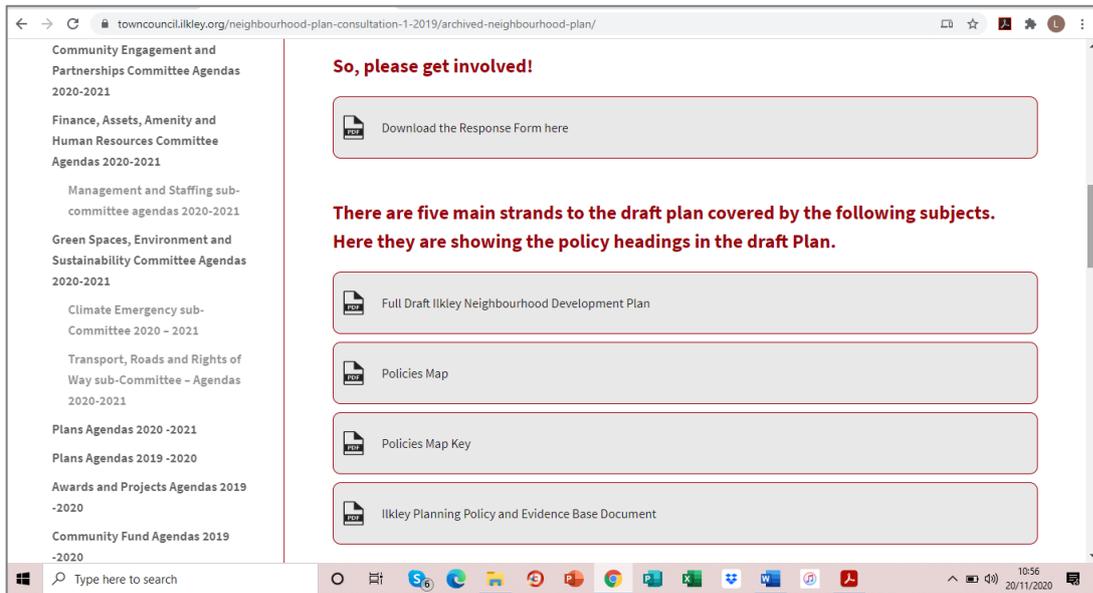
I look forward to hearing from you soon and thank you in anticipation for your assistance.

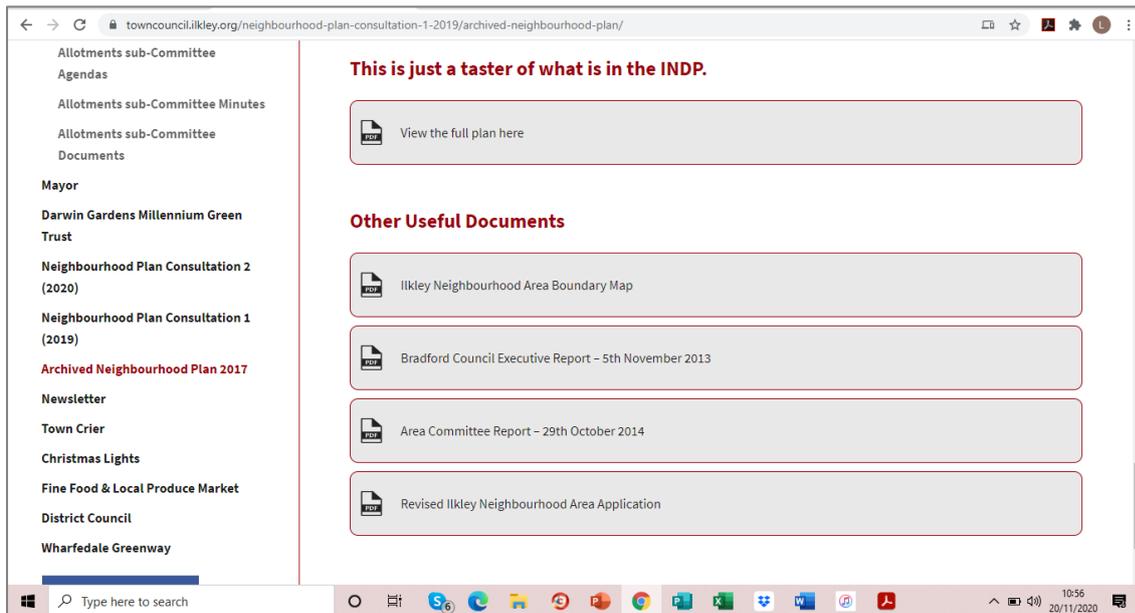
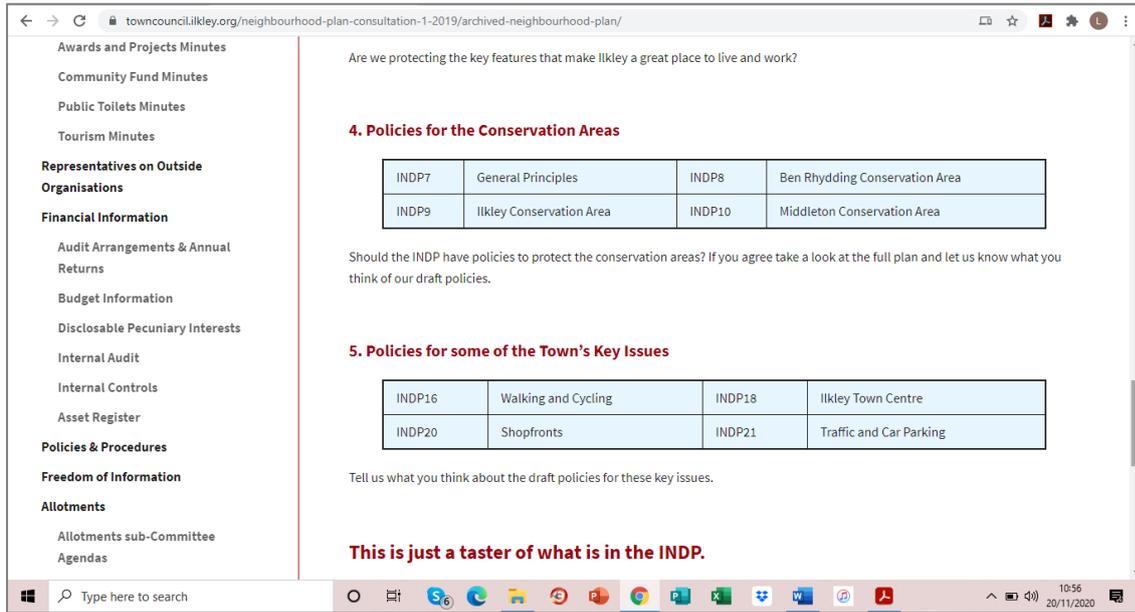
Yours sincerely

Steve Butler
Chairman
Ilkley Parish Council

ITC website screenshots of Archived Neighbourhood Plan 2017







Copy of Response Form

ILKLEY NEIGHBOURHOOD DEVELOPMENT PLAN (INDP) - RESPONSE FORM

To make a response on the Preferred Option Draft of the plan, please complete this form. There are 23 policies in the plan. The form below lists each of these and shows where they can be located in the plan. You are then asked whether you agree or disagree with each of the policies and, if the latter, to provide a brief reason. There is room to elaborate on any of your answers, as necessary, in the box at the end of the form. **There is no need to answer each and every policy, but please aim to answer as many as possible.**

Policy number	Policy summary	Do you agree? (yes or no)	If no, please give a brief reason
INDP1	New housing development within Ilkley (para 7.6)		
INDP2	Housing site allocations (para 7.8)		
INDP3	Community facilities (para 7.14)		
INDP4	Recreation facilities (para 7.15)		
INDP5	Allotments and community gardens (para 7.16)		
INDP6	Encouraging high quality and sustainable design (para 7.22)		
INDP7	Conservation areas - general principles (para 7.24)		
INDP8	Ben Rhydding conservation area (para 7.29)		
INDP9	Ilkley conservation area (para 7.33)		
INDP10	Middleton conservation area (para 7.38)		
INDP11	Local green spaces (para 7.44)		
INDP12	Green corridors (para 7.46)		
INDP13	Protecting Ilkley's landscape character (para 7.50)		
INDP14	Protecting and enhancing biodiversity (para 7.56)		
INDP15	Traffic and transport (para 7.61)		
INDP16	Walking and cycling (para 7.62)		

Policy number	Policy summary	Do you agree? (yes or no)	If no, please give a brief reason
INDP17	Leisure and tourism (para 7.66)		
INDP18	Ilkley town centre (para 7.72)		
INDP19	Public realm and art (para 7.75)		
INDP20	Shopfronts (para 7.76)		
INDP21	Ilkley town centre traffic and car parking (para 7.77)		
INDP22	Economy and employment (para 7.79)		
INDP23	Meeting the needs of all (para 7.82)		

Please use this box to expand any of your reasons above or to add any other comment

Name: _____

Address: _____

Email: _____

Please return this form no later than 13 November 2017 to – Ilkley Parish Council, Ilkley Town Hall, Station Road, Ilkley LS29 8HB or by email to clerk@parishcouncil.ilkley.org

Appendix 4: CBMDC Comments

August 2019 CBMDC Comments

Page	Paragraph	Policy Area Contact	CBMDC Comments
General comments (Kirkwells Consultant's recommendations in red)			
-	-	Planning Policy	<p>There needs to be a clear link between policy and evidence base used to support the plan. This is useful to readers, including the examiner, as it tells the story of how the plan has emerged. Also, it can help explain where/why policies go beyond national/local policy standards. Comment noted. The INDP already seeks to do this – each policy is accompanied by a Background/Justification section.</p> <p>It is noted that the plan refers to a Planning Policy Assessment & Evidence Base Review document. It is assumed that this will be updated to reflect changes in the national and local contexts as well as any other evidence that has emerged, and published alongside the Regulation 14 Draft Plan, and further updated as the Plan progresses. The Planning Policy Assessment & Evidence Base Review is NOT a legal requirement, but it will be updated.</p>
-	-	Planning Policy	<p>Will the NDP seek to identify any Community Infrastructure Levy priorities? This has been considered previously by the group. The Group can identify such priorities if they wish.</p>
-	-	Conservation	<p>Otherwise, I think the draft policies are reasonably consistent with the national advice of the NPPF and adopted local policy. Comment noted. No change.</p>
Chapter 2			
9	Paragraphs 2.2 & 2.3	Planning Policy	<p>Paragraph 2.2 is not necessary as the first bullet point in paragraph makes the same point. Delete.</p>
Chapter 3			
11	Paragraph 3.1	Planning Policy	<p>It is noted that the plan refers to appraising sites as part of the work undertaken since the designation of the neighbourhood area. It may helpful to clarify this within the plan as it no longer includes housing sites. Add clarification.</p>
Chapter 4			

13	Paragraphs 4.1 to 4.6	Planning Policy	<p>The Waste Management DPD was adopted in October 2017 and also forms part of the statutory development plan for Bradford District. As such it should be referenced within this section. Add reference.</p> <p>Paragraph 4.6 should reflect the latest situation with the Core Strategy Partial Review, at the time the draft NDP is published. Also, it should be noted that Council are also in the process of preparing an Allocations DPD. It may be helpful to include a link to the Local Development Scheme. The following wording is suggested: <i>“CBMDC are currently undertaking a partial review of strategic planning policies in the Core Strategy. This review looks a number of subjects including the plan period, housing and employment land requirements and distribution, the environment and transport. The review has reached the preferred options stage (as of July 2019). In line with national planning practice guidance, the INDP has taken account of this review, where considered necessary. An Allocations Development Plan Document is also being prepared. The timetable for the both documents is set out in the Local Development Scheme (July 2018)”</i> Amend as suggested.</p>
Chapter 5			
18	Paragraph 5.3	Planning Policy	See comment regarding evidence base and supporting documents. See general comments above.
Policies			
29 & 30	Policy INDP1	Planning Policy	<p>Policy INDP1 has the potential to be acceptable in that it is referring to what will be supported. It does not indicate in negative terminology that developments should be refused which could have led to problems down the line. Noted. No change.</p> <p>However it is referring to a number of environmental policy tests which are covered in the NPPF and Core Strategy already. Therefore, the issue will be to ensure that there is consistency with the NPPF and CS. It is queried whether the first part of the policy add anything more locally specific to what is already covered by existing policies.</p> <p>Suggested amendments – first part of the policy:</p> <ul style="list-style-type: none"> • criteria a) should refer to land and buildings Amend as suggested. • criteria e) – does this need to make reference to our emerging new Housing Design Guide Not at this stage this is only “emerging” – add to Background/Justification <p>Additional criteria could be added. The policy has identified the need to ensure that housing type and mix meets local need and the importance of affordable housing – could a positive criterion to support housing schemes which accord with the other criteria in this policy and meet such needs be added? Add new criterion as suggested.</p>

			<p>Second part: This part of the policy is fine, however it is not certain whether it adds to the adopted Core Strategy policy. There may an opportunity for the Plan to identify the areas where they higher densities would be appropriate and set a higher locally specific standard and by doing so help the goal of preserving greenfield and Green Belt land. Also, it may be appropriate to identify areas where local character is a particular key issue for sensitive design and thus possibly lower densities. Comment noted. No change.</p> <p>Green Belt section – it is not necessarily clear what this element of the policy is seeking to achieve and subsequent results. For example, is it aiming for lower density development should sites in the Green Belt be required? Greater clarity should be provided. Amend to provide greater clarity.</p> <p>Housing mix section - fine in principle. Comment noted.</p>
29	Policy INDP1	Planning Policy	Typographical error in criterion e – current reads “ <i>Core Stratgey</i> ”, should read “ <i>Core Strategy</i> ” Amend.
29 to 31	Housing Section	Planning Policy	In terms of the housing section it would be useful if there was some recognition of the value and positive role of well-planned and designed housing include the provision of affordable housing, supporting local services and community facilities, facilitating balanced and mixed communities. Add such a section to Background/Justification.
31	Para 7.4 (final sentence)	Planning Policy	The Core Strategy has already established that there are exceptional circumstances to change the Green Belt around Ilkley – so the sentence as drafted is not phrased correctly. What has not been proven, at this point in time, is the exceptional circumstances for any specific site or specific boundary change. This will be for the Allocations DPD to consider. Amend as suggested. Town Council may, separately, wish to consider if they agree with the first sentence of CBMDC’s comments in any submission they make to the Partial Review.
38 & 39	Policy INDP4	Planning Policy	In relation the provision of allotment sites, has an assessment of current capacity and future needs be undertaken at the town level? Has such an assessment been carried out? If so, we can add to Background/Justification. Are these proposed locations available or deliverable within the plan period? Can Group answer this point? Also, will the proposed locations for additional provision be shown on the Policies Map? Yes.
45	INDP7	Conservation	2nd paragraph, there is no such thing as red slate. It is suggested that this is re-worded to ‘ <i>stone or blue slate and red clay tiles for roofing materials</i> ’. Amend as suggested.
50 & 51	INDP9	Conservation	Key characteristics of the Middleton conservation area are the low density of built form, the spatial relationship of buildings to large plot sizes, and the mature landscaping and tree cover.

			<p>These aspects receive very little mention and should be emphasised in the policy as primary considerations when evaluating any new development proposals. Amend policy to take account of this point.</p> <p>The reference to boundary walls in Middleton is felt to be rather inaccurate. Many of the domestic boundaries are vegetation or fencing. Deviation from this informal approach and introduction of masonry or more formal boundaries proves very intrusive and harmful to the conservation area streetscape and should be resisted. Amend policy to take account of this point.</p>
55	7.42	Planning Policy	<p>The Local Green Space Assessment should be published alongside the Regulation 14 Draft Plan. It would be useful if this could be shared with CBMDC. The Group's assessment should be sent to CBMDC,</p>
64	7.53 (Second Sentence)	Planning Policy	<p>Should this read "A "zone of..." rather than " A 2zone..." Yes.</p>
70 & 71	Policies INDP15 & INDP16	Countryside & Rights of Way	<p>Policies INDP 15 – Walking and Cycling and INDP 16 - Leisure and Tourism look broadly ok. Noted. No change.</p> <p>The only comment is that bridleways and the needs of horse riders as both vulnerable road users and a leisure activity undertaken in the area are conspicuous by their absence. This is perhaps understandable as much of the focus is on traffic and transport where modal shift towards walking and cycling is to be encouraged and the fact there are few recorded bridleways within the area covered by the neighbourhood plan.</p> <p>Nonetheless it may be advisable for the Town Council to consider a tweak to policy INDP 15 in both section a) and b) from <i>...footpath and cycle path network.....</i> to <i>'footpath, bridleway and cycle path network'</i> Amend as suggested.</p>
73	Policy INDP17	Planning Policy	<p>In terms of requiring an impact assessment, adopted Core Strategy DPD policy EC5(F) states that it is also required for office and leisure development. Policy INDP17 should reflect this. It may also be helpful to refer to the sequential test as well. Alternatively links should be drawn with policy EC5 Amend as suggested.</p> <p>The inclusion of support for temporary uses that bring back vacant into use is noted. It may better that this is included as a "community action" or a "Town Council supporting action". It may also be useful to include some reference in the supporting text. Comment noted. No change.</p>
74	Paragraph 7.69	Planning Policy	<p>It is suggested that the first sentence is amended for clarity regarding the town centre and the settlement hierarchy, as</p>

			follows: “As Ilkley is identified as a Principal Town in the settlement hierarchy of CBMDC’s Local Plan Core Strategy, the town centre has an important role to play as a focus for the community and wider area.” Amend as suggested.
75	Paragraph 7.70	Planning Policy	The proposed retail expansion area at Lower Wellington Road (south of Booth’s supermarket) was established in the adopted Core Strategy (2017). It was established through the policies of the Replacement Unitary Development Plan. This should be acknowledged. Amend as suggested.
75	Paragraph 7.72	Planning Policy	This paragraph states “The INDP supports Policy CT3 of the Core Strategy....”. This policy was superseded by Policy EC5(J). Amend as suggested.
77	Paragraph 7.75	Planning Policy	It is noted that there is a requirement for those undertaking or proposing public realm development or works to consult the local business community, Town Council and Civic Society. This could potentially be viewed as being onerous. Therefore, it is suggested engagement should be encouraged rather than required. Amend as suggested.
79 & 80	Supporting TC Action	Planning Policy	It is suggested that the supporting action for the Town Council and its supporting text is moved to end of policies section for clarity. Amend as suggested.
81	Paragraph 7.79	Planning Policy	Policy INDP21 replace with Policy INDP20 Amend as suggested.
82	Policy INDP21 & Paragraph 7.83	Planning Policy	Policy INDP22 replace with Policy INDP21 Amend as suggested.
87	Glossary	Planning Policy	<p>It is suggested that, where possible, the explanations in the glossary of terms are updated to reflect those set out in Annex 2 of the NPPF (2019). Some of these include the definitions of:</p> <ul style="list-style-type: none"> • Affordable Housing • Ancient Woodland • Development Plan • Older People • Primary Shopping Area • Special Areas of Conservation (SAC) • Special Protection Areas (SPA) • Windfall sites. <p>Use latest NPPF definitions in Glossary.</p>

September 2019 CBMDC comments

Page	Paragraph	Policy Area Contact	CBMDC Comments
General comments (Kirkwells Consultant's recommendations in red)			
-	-	Biodiversity	Overall, the plan is very promising and sets out Biodiversity and Ecology as a central theme for the plan in Objective 4. It then references biodiversity enhancements and other considerations throughout. These comments are intended to strengthen this using positive suggestions to reinforce this and ensure the policies are consistent with local plan policies and NPPF policies. Comment noted, no change.
-	-	Biodiversity	<p>The use of ecology records as evidence is important to this plan – to back up and reinforce the policies in many cases and to ensure there is no conflict with any of the policies put forward and potential biodiversity issues. West Yorkshire Ecology Service (WYES) provide records free of charge for the purpose of Neighbourhood Plans and I would highly recommend these are obtained as part of the evidence required. Town Council to request copy of WYES records.</p> <p>The location of the plan area is strategically very important for biodiversity as it includes a part of the South Pennines Moor SSSI, SAC and SPA and all of the plan area lies within 2.5km of this site and/or the North Pennines Moor SSSI, SAC and SPA to the North. Bradford MDC core policy development Plan SC8 policy is highly important here. This is picked up in the within most policies within the Plan but it could be more robustly set out in the context.</p> <p>Outside of the South Pennines Moor one of the most important biodiversity features is likely to be the high concentration of birds of open farmland. Ground nesting birds are becoming alarmingly rare these days and policies which involve developing farmland and green space will impact on these species (eg lapwing, golden plover, oyster catcher, curlew, skylark, meadow pipit) some of this land may be functionally linked to the SPA and development will need to be considered as part of our SC8 policy, but these bird assemblages are also very important in their own right and some of them protected under different legislation and policy. Amend to make references to South Pennine Moors more robust.</p>

		<p>Parts of the Bradford Habitat Network runs through the area. This network is designed to ensure resilience of biodiversity from Climate Change and local extinctions. Some of the Green Infrastructure sites identified are part of this network and it would be beneficial to refer to this NPPF/Local Plan policy in the text and include a map to back this up. Add in reference. There are a large number of Local Wildlife sites in the area. 3 sites are referred to in the plan as SEGI's (but have been, or are in the process of being upgraded to Local Wildlife Sites):</p> <ul style="list-style-type: none"> • Ben Rhydding Gravel Pits Local Wildlife Site (accepted on 14/12 2017) • Middleton Woods Local Wildlife site (accepted on 23/2/2017) • River Wharfe – currently still being assessed but likely to be designated as a Local Wildlife Site in full or in part. <p>Other Local Wildlife sites:</p> <ul style="list-style-type: none"> • Owler Park and Spring Wood LWS • Terrace Ghyll LWS • Crabtree Ghyll LWS • Briery Wood and Hebes Wood LWS • Panama Wood LWS. <p>Some of these sites (and other areas within the plan are also Ancient Woodlands) Amend as suggested.</p> <p>Detailed information can be obtained on the sites and the reasons for designation which is vital information for any development within the plan area and will help ensure any green space management of the sites, through the plan activities or otherwise takes full account of their status. The CBMDC core policy EN2 is currently being updated to fully incorporate the current upgrades and recent changes to national policy and as the Neighbourhood plan is the highest tier of development control it would clearly be beneficial for the sites to be fully incorporated within the plan. Add sites to INDOP and Policies Map.</p> <p>Protected and notable Species records can also be obtained from WYE. These also will provide some background for any development within the area or management of green spaces. They can be constraints or can guide developments with respect to enhancements. For instance, Ilkley has the only confirmed recent record of Great Crested Newt for Bradford District (located to the east of the River Wharfe) and management for this species in this area is therefore very important. Comment noted, but this is more a matter for</p>
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			<p>planning applications – the INDP does not put forward development sites.</p> <p>CBMDC EN2 policy is also being upgraded to take account of the National Policy of net gain for biodiversity. This is likely to be made mandatory in the near future. Net gain is a policy which ensures developments must deliver an overall increase in Biodiversity (for major developments this is likely to be in the order of 10% additional biodiversity – calculated by use of a metric). It looks as though minor developments will not immediately have to use the metric – but will be expected to enhance through other measures. This policy introduces other features such as the mitigation hierarchy (which prevents high value habitats from being developed) and offsets, which allows for any loss of biodiversity to be compensated for elsewhere if it can not compensate within the site. This policy will make biodiversity issues central to all developments (currently they are still sometimes treated as an add-on) and this policy needs to be set out within the neighbourhood plan too as it will impact on any development which occurs in the plan area. Amend to add references to net gain in biodiversity.</p> <p>Bradford MDC has commissioned a guide which is currently undergoing consultation prior to being accepted as a supplementary document within the local plan. It can be found at https://bradford.moderngov.co.uk/mgConsultationDisplay.aspx?ID=200</p> <p>As increasing urbanisation is occurring and often displacing wildlife, it is hugely important that space and features are made integral to any development to prevent even our once common species (e.g. hedgehogs) from becoming extinct. This guide sets out ways that wildlife and green features can be integrated into developments at a variety of levels, (neighbourhoods, streets and individual housing). Some of the potential features are mentioned already within the plan, but we suggest this is made more robust using ideas from the guide (or a referral to the guide) Amend to include references to this guide where appropriate.</p>
-	SEA/HRA	Biodiversity	Please can we see the SEA and HRA. Copies to be re-sent.
Chapter 6			

25	Paragraph 6.2	Planning Policy	There's a missing 'the' between 'of' and 'present'. Amend.
26	Paragraph 6.3	Planning Policy	Missing full stop at the end of the first sentence. Amend.
Policies			
37	INDP3	Planning Policy	No comments
38	INDP4	Planning Policy	Although allotments are an acceptable use in the Green Belt – any buildings constructed in association with such a use would need to preserve the openness of the Green Belt and should not conflict with the purposes of including land within the Green Belt. It may not be necessary to include this in the policy but a footnote could be helpful to clarify the position or reference back to the NPPF. Add a footnote.
39	Paragraph 7.13	Planning Policy	Replace full stop with a comma after recreation and change "Health" to "health". Amend.
53 to 55	INDP10/Paragraph 7.42	Planning Policy	Would be useful to have map to show the locations of the proposed Local Green Spaces. In addition, it is noted that the draft document refers to a full Local Green Space assessment being available as an accompanying document. It would be helpful if this could be provided to CBMDC. CBMDC have seen the Policies Map with the Local Green Spaces. This will be re-provided when updated. Town Council to send CBMDC copy of LGS assessment.
55	INDP11	Planning Policy	May be useful to know how the Green Corridors have been defined/identified – what sources of information have been used? Various online sources have been used, and Group held a mapping session.
96	INDP13	Planning Policy	May want to consider including reference to Biodiversity Net Gain Amend as suggested.
63	INDP13	Biodiversity	Protecting and Enhancing Biodiversity Please qualify 'native species' using the term – 'native species of local provenance' as imported trees and plants can be harmful to our local native habitats. Amend as suggested.
64	7.53	Biodiversity	It may be a good idea here to list the bird species which are qualifying species (or in the case of the South Pennines-assemblages) of the SPA. Also please can the functionally linked habitats (normally sites where SPA qualifying species congregate or forage) be defined? They have the same protection as the European site itself. List qualifying species. I would suggest it is beyond scope of NDP to define functionally

			linked habitat – specialised area, that will change over time. Comment noted, but no change. Such matters as the comment notes are given the same protection as the SPA and would have to be assessed at planning application stage.
64	7.53	Planning Policy	Typo - replace '2' with " Amend as suggested.
64 to 66	7.54	Planning Policy	References to SEGIs should be replaced with Local Wildlife Sites (LWS) – as West Yorkshire Ecology have now completed a review of all SEGIs and brought in a new naming system. Need to check the status of these sites with WYES. Amend as suggested.

Appendix 5: Regulation 14 Public Consultation 1: November to December 2019

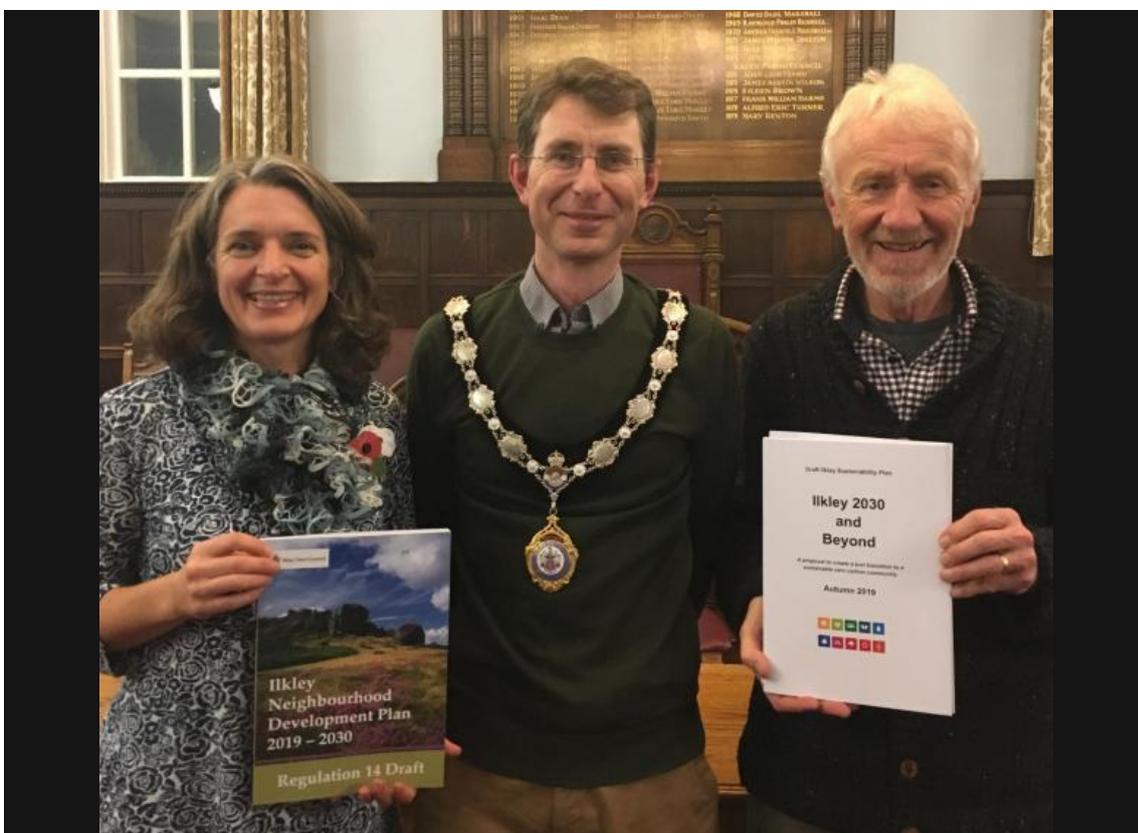
Thursday 7th November to Thursday 19th December 2019

Article in the Ilkley Gazette

6th November 2019

Have your say on future of Ilkley

By [Annette McIntyre](#) Reporter



Cllr Ros Brown, Cllr Mark Stidworthy and Steve Peel, from Climate Action Ilkley

PEOPLE in Ilkley are being urged to have their say on the town's future development with the launch of a public consultation this week.

The town council is running its consultation on the Ilkley Neighbourhood Development Plan from Thursday, November 7 until Thursday, December 19. It will also hold a public meeting and drop in sessions.

Ilkley's Deputy Mayor and the plan's project leader, Cllr Ros Brown said: "The INDP is a relatively new type of plan which is concerned with land use planning and development. It allows local people to help shape the future development of Ilkley and Ben Rhydding. It is vital the Neighbourhood Development Plan reflects the issues of greatest concern to residents for the development of our town."

Following consultation the plan will be revised and then submitted to Bradford Council and an independent examiner before going to public referendum. It is hoped the process will be completed in the Spring. If successful at referendum the INDP will sit alongside Bradford Council's statutory local plan. This means decisions on planning applications for Ilkley will be made using both the local plan and the neighbourhood development plan.

Cllr Brown said: "The Town Council are very grateful to former councillor Brian Mann and the committee of town councillors and experienced volunteers who initiated the plan and steered it to this point."

Ilkley's Mayor, Cllr Mark Stidworthy, also invited people to take part in the consultation on the Ilkley Sustainability Plan which runs for the same period and can be accessed in the same places as the neighbourhood plan.

"As there are strict limits on the scope of neighbourhood plans the Ilkley Neighbourhood Development Plan working group of Ilkley Town Council saw the need for a wider vision for the town based on tackling the challenges of climate change and environmental degradation," he said.

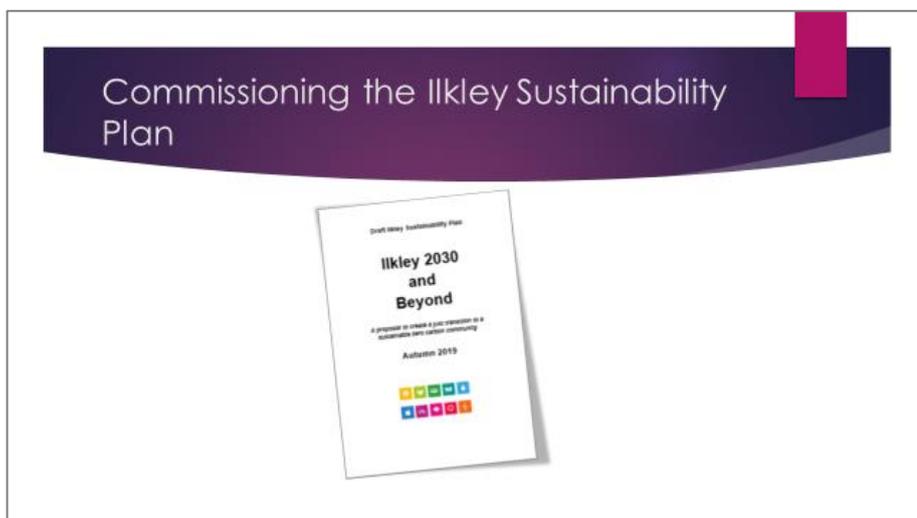
Whilst the ISP has areas of overlapping interest and influence it will not be taken into account in Bradford Council's assessments of planning applications in Ilkley.

The plans and response forms can be accessed at <https://towncouncil.ilkley.org/neighbourhood-plan/>. Hard copies can be viewed at the town hall, the library, Clarke Foley Centre, Christchurch, Ben Rhydding Methodist Church and St John's Church Ben Rhydding.

The public meeting takes place at The Clarke Foley Centre from 7pm to 8pm on Friday, November 29. Drop-in sessions will take place at the Town Hall between 10am and 12 noon on Thursday November 14, Monday November 18 and Wednesday December 4. Enquiries can be made to the town council's clerk on 01943 436212 or at clerk@towncouncil.ilkley.org.

Copy of PowerPoint presentation, 29th November 2019

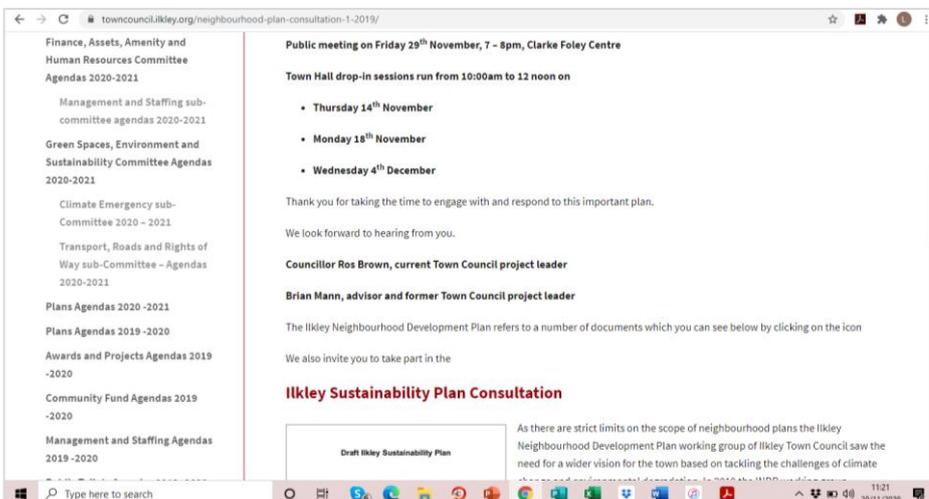
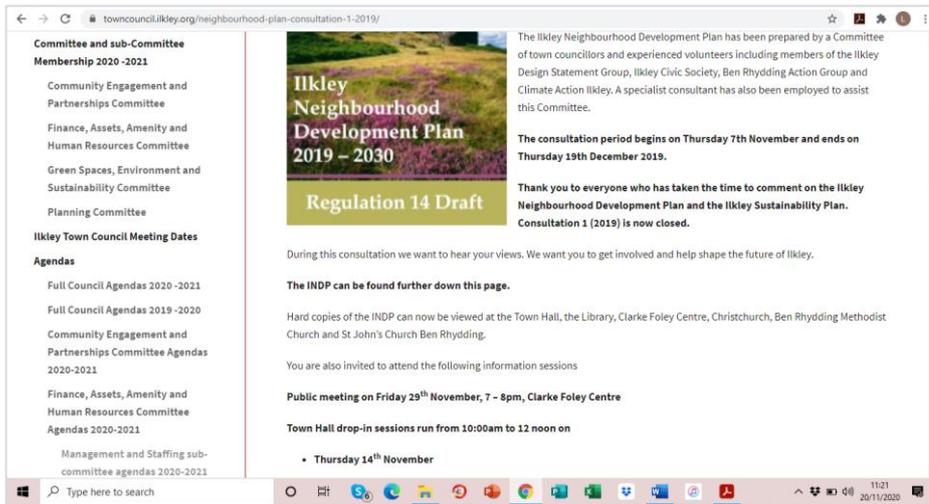
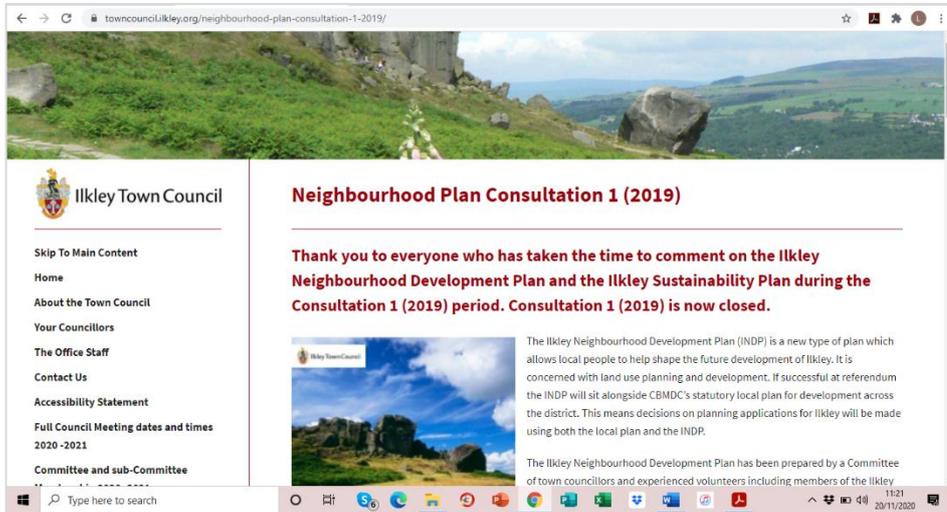


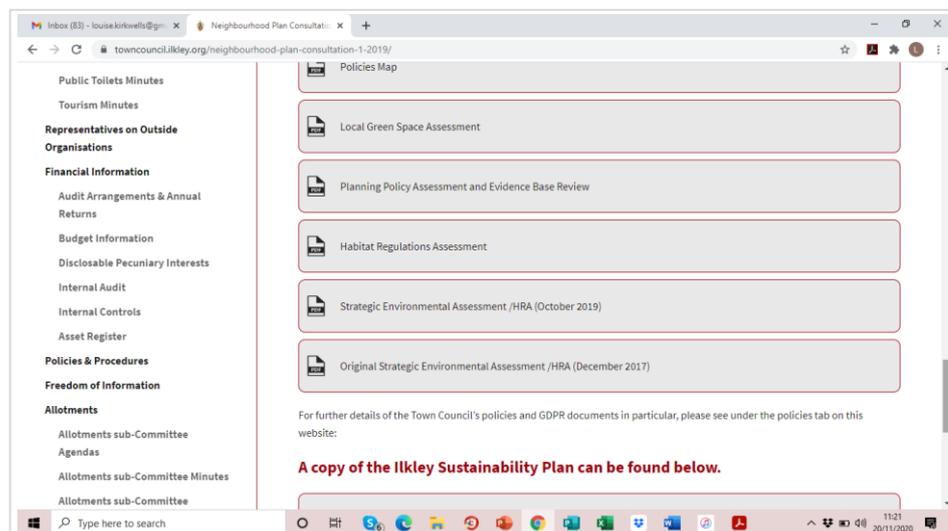
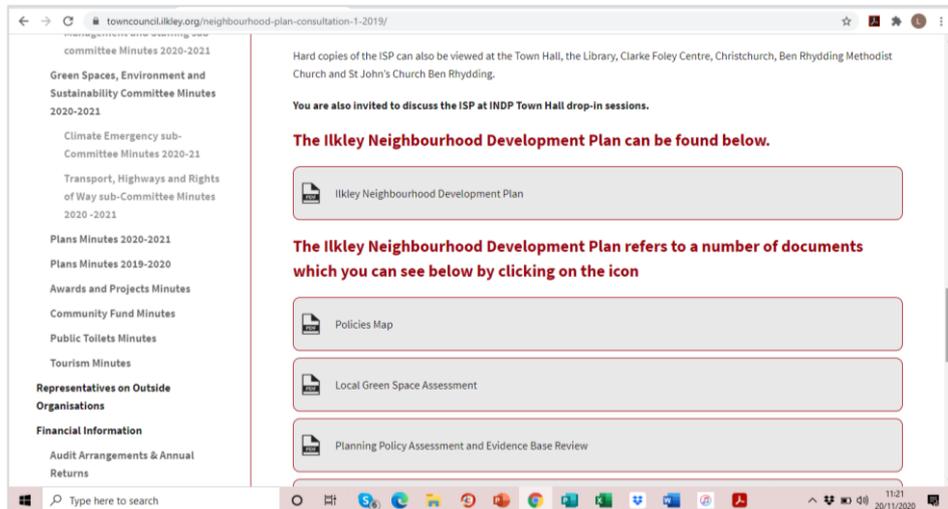
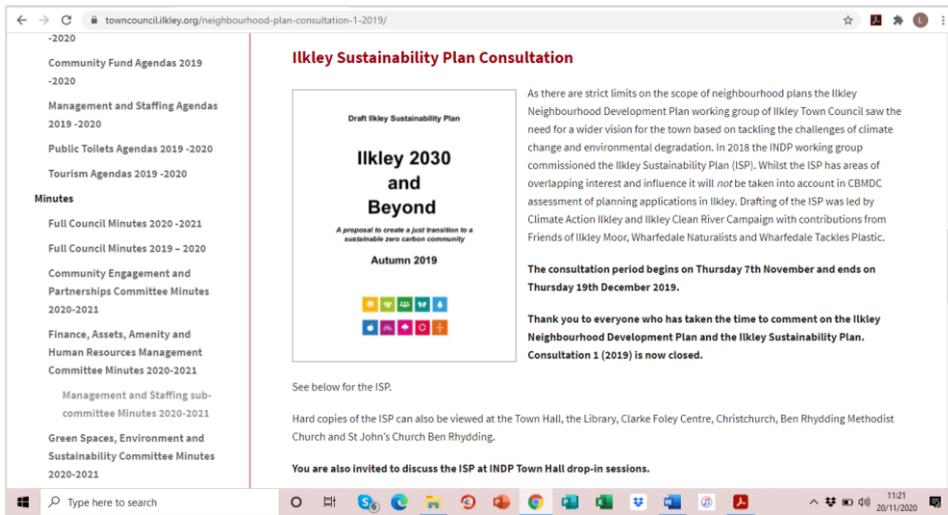


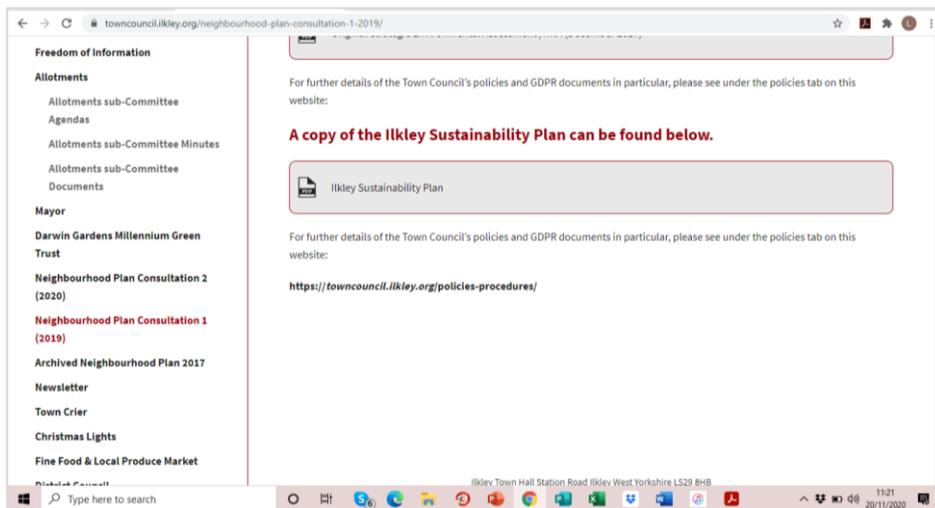
- ## Consultation ends 19th December
- ▶ **Final INDP Consultation drop-in session**
 - ▶ Town Hall, Wednesday 5th December, 10am – 12

 - ▶ **Ilkley Sustainability Plan Engagement Event**
 - ▶ Clarke Foley Centre, Thursday 6th February, 7.30pm

Copies of Screenshots of Town Council website







Copy of Response Form

Office Use Only Consultee No. Representation No.

Ilkley Neighbourhood Plan

Regulation 14 Consultation

7th November 2019 to 19th December 2019

ALL RESPONSES **MUST BE RECEIVED** by 19th December 2019

Representation Form

PLEASE COMPLETE AND RETURN **ONE** FORM FOR EVERY COMMENT MADE

Name	
Organisation	
Address	
Email	
Tel. No.	

Please state to which part of the Draft Neighbourhood Plan your representation refers. (Please indicate with X)

Page Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please indicate with X)

Support	
Object	
Making a Comment	

Please Turn Over

Please use the box below for any comments (attach additional sheets if necessary).

I also consent to my personal details being shared with City of Bradford MDC (CBMDC) for the purposes of CBMDC carrying out their duties at Regulation 16 Consultation (please tick box)

Thank you for your time and interest. Please return this form to: INDP Regulation 14 Consultation, Ilkley Town Hall, Station Road, Ilkley, LS29 8HB

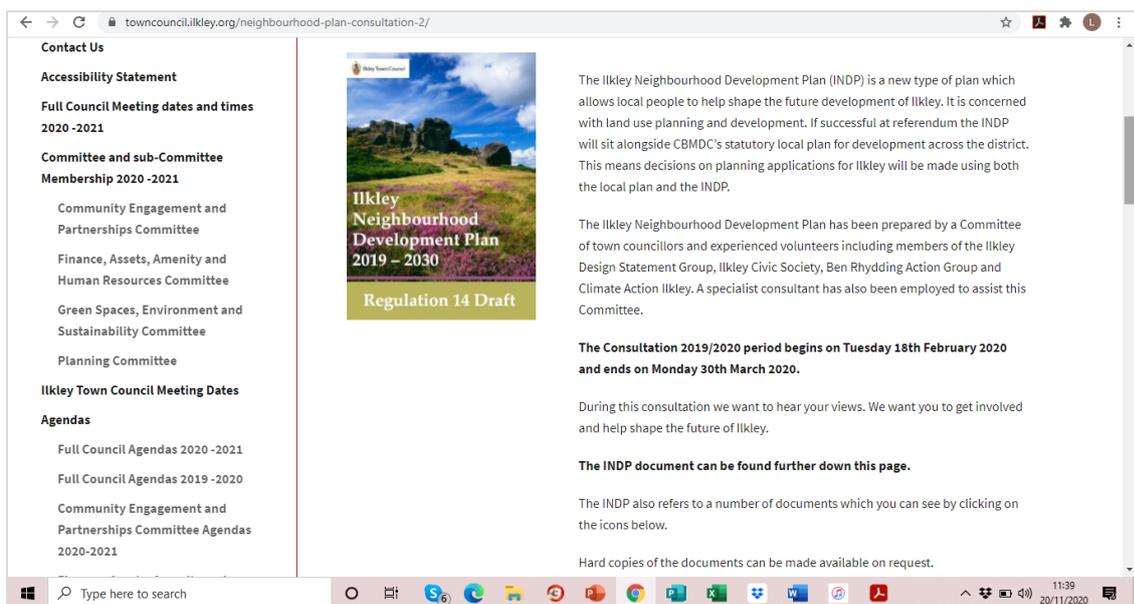
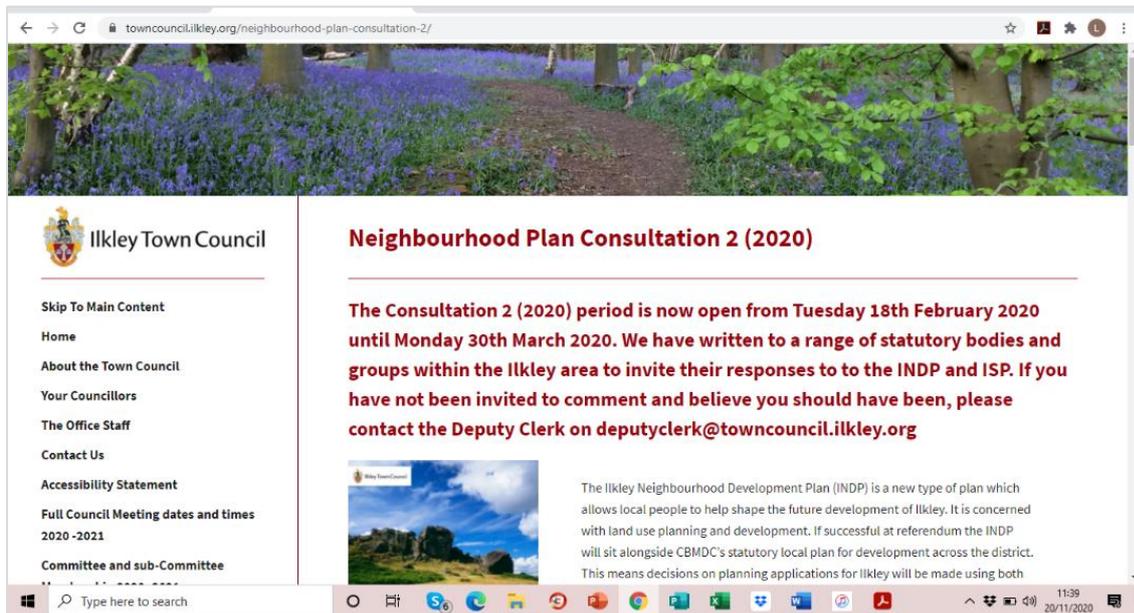
Or by email to: clerk@towncouncil.ilkley.org

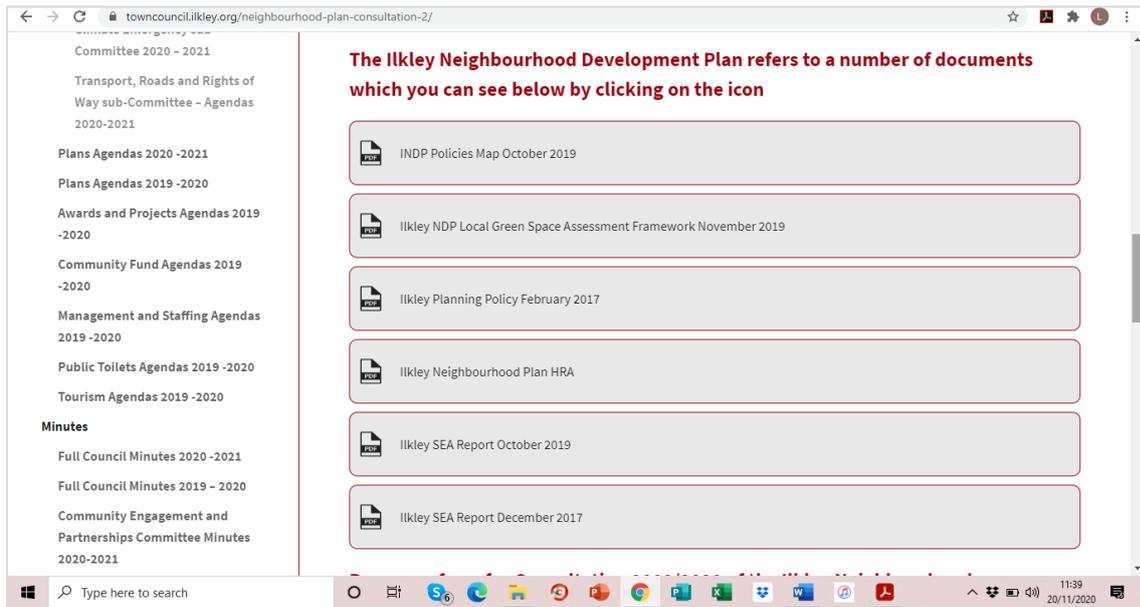
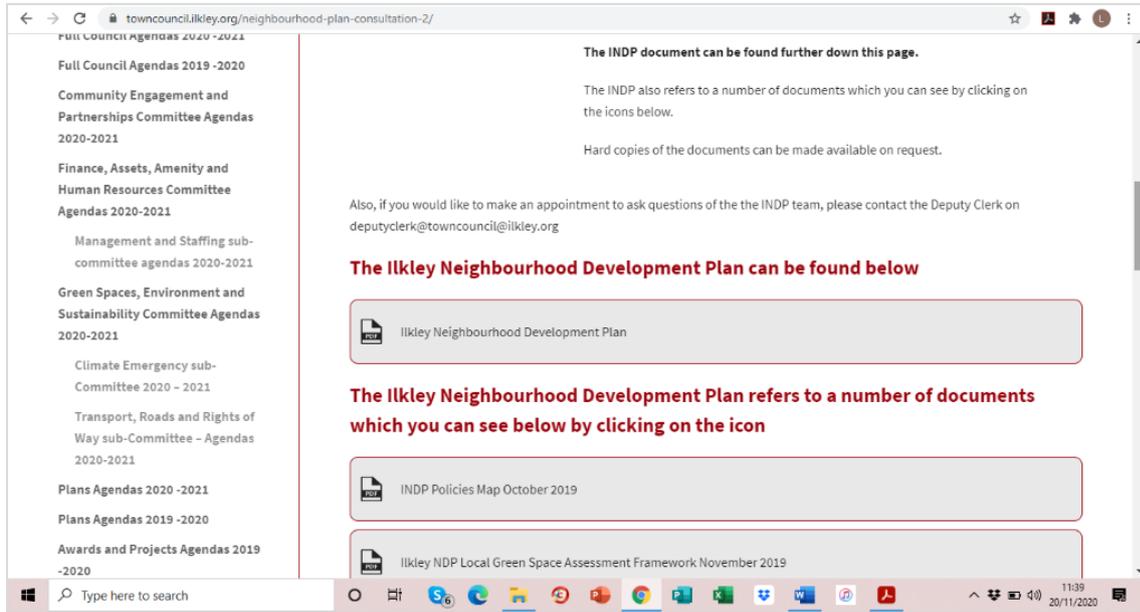
Appendix 6: Regulation 14 Public Consultation 2: February to March 2020

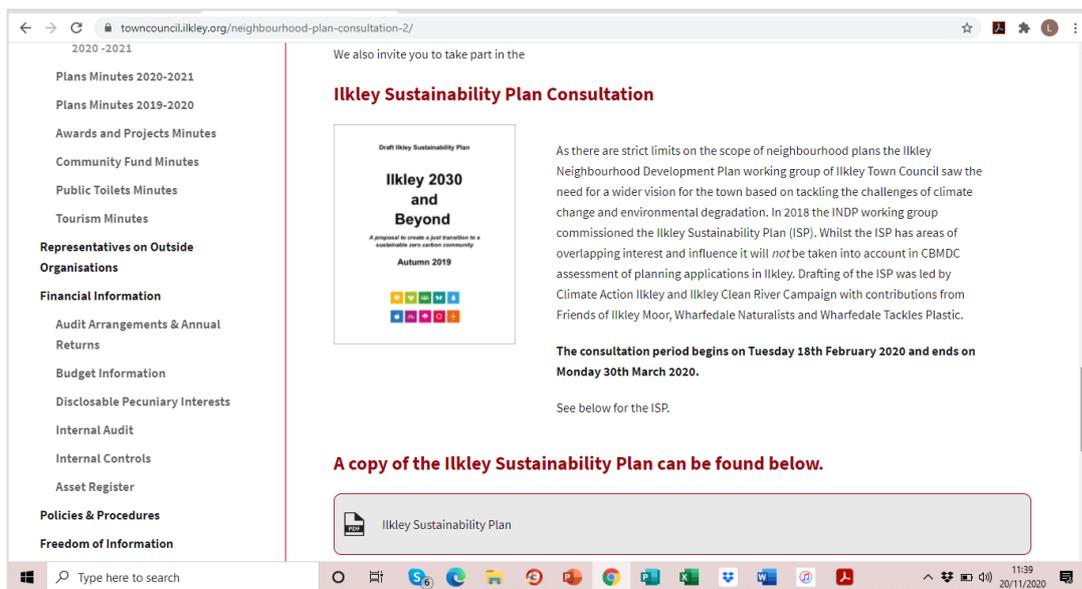
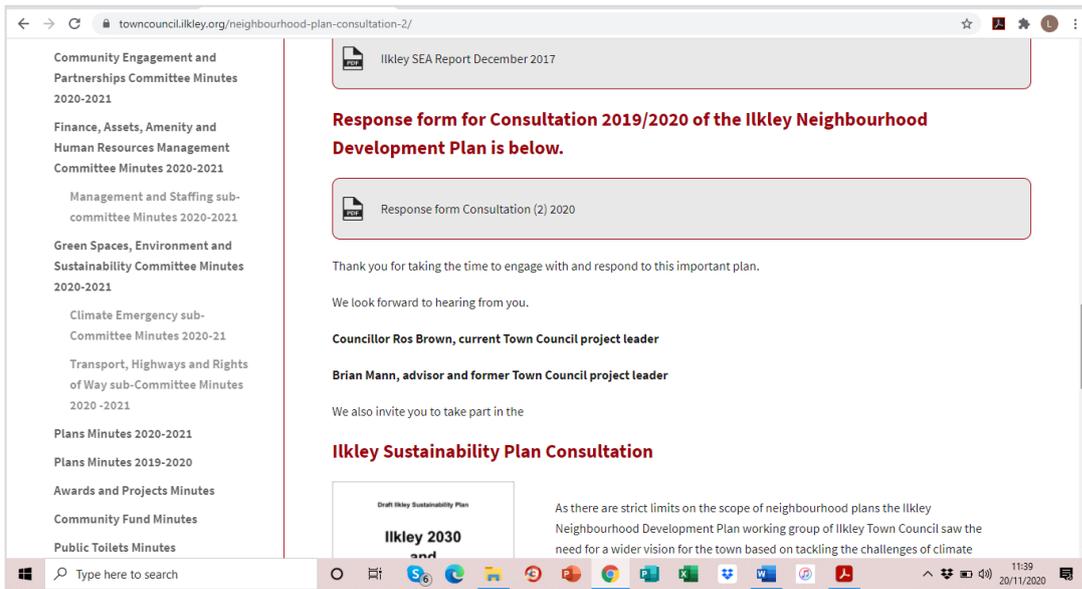
Tuesday 18th February 2020 until Monday 30th March 2020

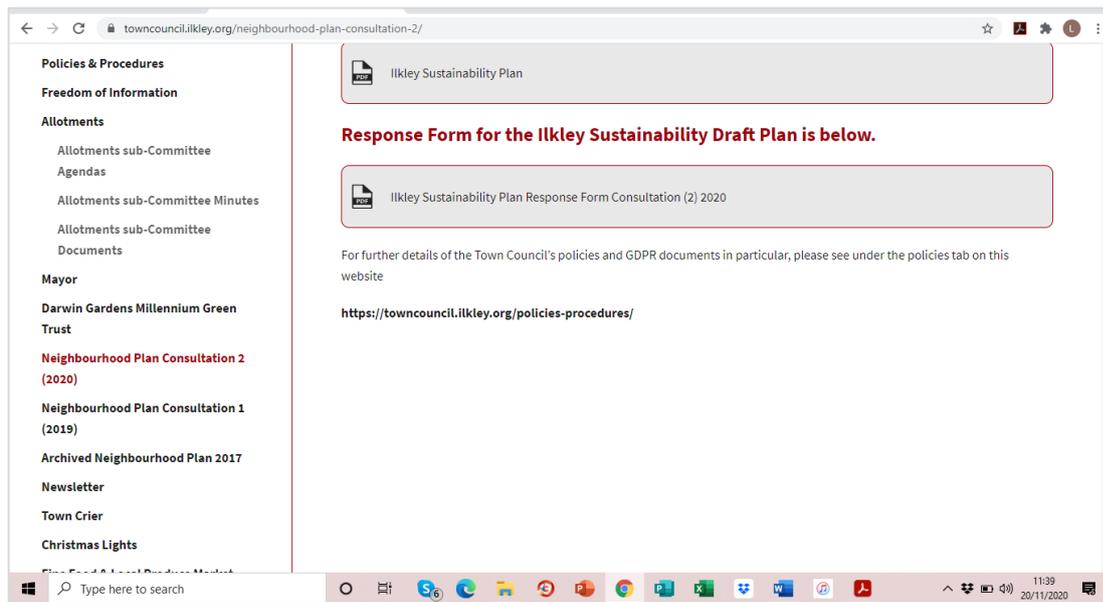
Screenshots of Town Council Website

<https://towncouncil.ilkley.org/neighbourhood-plan-consultation-2/>









Copy of Response Form

Office Use Only Consultee No. Representation No.

Ilkley Neighbourhood Plan
Regulation 14 Consultation 2

18th February to 30th March 2020

Representation Form

PLEASE COMPLETE AND RETURN ONE FORM FOR EVERY COMMENT MADE

Name	
Organisation	
Address	
Email	
Tel. No.	

Please state to which part of the Draft Neighbourhood Plan your representation refers. (Please indicate with X)

Page Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please indicate with X)

Support	
Object	
Making a Comment	

Please Turn Over

Please use the box below for any comments (attach additional sheets if necessary).

I also consent to my personal details being shared with City of Bradford MDC (CBMDC) for the purposes of CBMDC carrying out their duties at Regulation 16 Consultation (please tick box)

Thank you for your time and interest. Please return this form to: INDP Regulation 14 Consultation, Ilkley Town Hall, Station Road, Ilkley, LS29 8HB

Or by email to: clerk@towncouncil.ilkley.org

Copy of Letter to Consultees

Ilkley Town Council

Dear Sir or Madam,

I am writing to invite you to take part in the **Ilkley Neighbourhood Development Plan Regulation 14 Draft Public Consultation 2**. The consultation period will run for six weeks between 18/2/20 and 30/3/20. I attach a copy of the Neighbourhood Plan and Policies Map for your consideration.

The Ilkley Neighbourhood Development Plan refers to a number of documents which you can see on the town council website using the link below

<https://towncouncil.ilkley.org/neighbourhood-plan-consultation-2/>

Ilkley Town Council are also inviting you to take part in the Ilkley Sustainability Plan consultation which can be accessed using the link above.

Hard copies of the documents can be made available for viewing on request. If you would like to make an appointment to ask questions of the Neighbourhood Development Plan team please contact the Deputy Clerk on deputyclerk@towncouncil.ilkley.org

Should you wish to make comments on the plans this should be done using the representation forms available online (at the website above) or by requesting a copy from the town clerk clerk@towncouncil.ilkley.org

Kind regards,

pp. Helen Gibbs.

Louise Close
Clerk to Ilkley Town Council

T: 01943 436212
E: clerk@towncouncil.ilkley.org



Ilkley Town Council, Ilkley Town Hall, Station Road, Ilkley, LS29 6HB
clerk@towncouncil.ilkley.org www.towncouncil.ilkley.org

Copy of email to Consultees

From: Deputy Clerk <deputyclerk@towncouncil.ilkley.org>
Sent: 18 February 2020 09:53
To: Iain Cunningham <Iain.Cunningham@bradford.gov.uk>
Cc: Ros Brown <councillorbrown@towncouncil.ilkley.org>
Subject: Ilkley Neighbourhood Development Plan Consultation

Dear Iain,

Further to our telephone conversation last Friday, please find below the link to the INDP Reg 14 consultation 2019/2020 documents located on the Ilkley Town Council website, as requested.

I would be most grateful if you could circulate this email around those departments at BMDC which will use this document in their decision making.

Please do not hesitate to contact me should you require further information.

The INDP Committee looks forward to receiving your comments,
Best wishes,
Helen

<https://towncouncil.ilkley.org/neighbourhood-plan-consultation-2/>

Helen Gibbs

Deputy Clerk
IlkleyTown Council

Ilkley Town Hall
Station Road
Ilkley
LS29 8HB

T: 01943 438212

E: deputyclerk@towncouncil.ilkley.org

W: www.towncouncil.ilkley.org

*Please note my normal working pattern is Monday, Tuesday and Thursday
Office opening hours are Monday – Thursday 10:00am – 1:00pm*

The information in this email and any attachments is confidential. It is intended solely for the attention of the named addressee(s). If you are not the intended recipient you are not authorised to, and must not copy, distribute, use or retain this message or any part of it.

Appendix 7: List of consultation bodies and organisations contacted

CBMDC

Local Plan Team, Development Management, Highways, Public Health, Heritage, Landscape, Public Rights of Way, Biodiversity

Cllr Mike Gibbons

Cllr Kyle Green

Cllr Anne Hawkesworth

Robbie Moore MP

North Yorkshire County Council

Harrogate Borough Council

Mid Wharfedale Parish Council

Addingham Parish Council

Burley Parish Council

Keighley Town Council

Menston Parish Council

Natural England (SEA Consultee)

Environment Agency (SEA Consultee)

Historic England (SEA Consultee)

West Yorkshire Archaeology Service

Canal and River Trust

Coal Authority

Network Rail

Sustrans

Highways England

National Grid

Yorkshire Water

Northern Gas Networks

Northern Powergrid

West Yorkshire Police

West Yorkshire Fire and Rescue Service

Sport England

Ilkley Grammar School

All Saints C of E Primary School

Ashlands Primary School

Ben Rhydding Primary School

Sacred Heart Catholic Primary School

Moorfield School

All Saints Pre-School, Ilkley
Ben Rhydding Pre-School Playgroup
Ilkley Pre-School Playgroup

Ilkley BID
Ilkley Business Forum

Age UK-Bradford and District
Arienteers
AWARE Airedale and Wharfedale Autism Resource
Ben Rhydding Community Fete
Ben Rhydding Golf Club
Ben Rhydding Hockey Club
Ben Rhydding Snooker Club
Ben Rhydding Tennis Club
Churches Together Ilkley
Clarke Foley Centre
Climate Action Ilkley
Community Action Bradford and District (Ilkley network)
Friends of Ilkley Lido
Friends of Ilkley Moor
Friends of Ilkley Riverside Parks
Friends of the Manor House
Ilkley and District Good Neighbours
Ilkley and District Riding Association
Ilkley Civic Society
Ilkley Clean River Group
Ilkley Community Network
Ilkley Community Transport
Ilkley Cricket Club
Ilkley Cycling Club
Ilkley Food Bank
Ilkley Golf Club
Ilkley Harriers
Ilkley Lawn Tennis and Squash Club
Ilkley Literature Festival
Ilkley Operatic society
Ilkley Round Table
Ilkley Rugby Club
Ilkley Swimming Club
Ilkley Town Football Club
Lower Wharfedale Ramblers
LS29
Outside the Box
Rotary Club

U3A

Upstagers Theatre Group

Wharfedale Festival of Performing Arts

Wharfedale Scout and Guide representatives

Appendix 8: Regulation 14 Public Consultation (1 and 2) Responses and Amendments

Reference	Respondent	Comment	Amendment
1	Resident	<p>I think that P75 is possibly the only page on which the Grove is mentioned, and there is very little discussion of it. This is strange, since I think it is by far the most important feature of public life in the centre of Ilkley.</p> <p>We know that there are many conflicting views of what should happen on the Grove. These range from making it one way to ease congestion (this may also result in faster vehicle speeds) to completely pedestrianising it (which may not be possible due to its status as a relief for the A65).</p> <p>The INDP is probably right not to get involved specifically in these arguments but it may be worth stressing the importance of the Grove and the way it is managed to public life in the town.</p>	Additional commentary to Background/Justification of Policy 17.
2	Resident	<p>Policy 18 - The public realm is important in forming the setting for life in Ilkley, The wording on this page is unexceptionable and I support its general intent.</p> <p>I note that BMDC has a proposal to carry out a public realm study of Ilkley, though at present there does not appear to be a budget for it. Whilst it may not be appropriate to refer to this in the INDP, the town council and others should keep pressure on</p>	Comment on public realm study noted. No change to INDP.

Reference	Respondent	Comment	Amendment
		for this study to take place, and make sure that we are fully involved.	
3	Resident	The public consultation identified congestion and parking as important issues for Ilkley inhabitants (p18) and recent events confirm this. Car parking is then mentioned in the plan on pp 69, 70 and 83. The key section is on p83. It is sensible not to be prescriptive on this emotive issue, or it might jeopardise the progress of the plan through its next stages. Therefore I think the proposed measures are appropriate, and the wording suitable.	Supporting comments noted. No change.
4	Resident	<p>Policy 14 – I would like more detailed plans as to how we can have safer cycling around Ilkley. Safe to such an extent that families could cycle to school and to other activities they participate in around Ilkley. This would make a big difference to local car use.</p> <p>We need more solar panels around both private and public buildings or on the ground with increased biodiversity beneath. We need a few windmills there is plenty of wind.</p>	Objective 6, Policies 14 and 15 strengthened.
5	Resident	Policy 16 (<i>sic</i>)– proposals for dedicated cycleways could be supported even if they do compromise other means of travel? Safety of children on cycles getting to school on a cycleway is more important than slightly compromising car users for convenience/speed. Perhaps it is more about not compromising the safety of other means of travel?	Objective 6 and Policy 15 strengthened.

Reference	Respondent	Comment	Amendment
6	Resident	<p>Policy 14 – seems to be very limited comment on the need to upgrade and improve local transport as this will be a good way to both reduce car use and congestion in Ilkley but also keeping the high levels of tourism which mainly add to Ilkley’s economy with the increase parking prices and reduction of free parking areas. Also could be via improvement and reliability of bus services and/or the reliability of train services.</p> <p>Also the policy the policy talk about the implementation of a park and ride service which I believe will be very hard to provide without green belt sites being built on and also people needing to drive to the area in the first place which could be prevented by {lack of] public transport improvements.</p>	Policy 14 deals with the matters raised. No change.
7	Resident	The Sustainability Plan should include something about energy, how to generate energy – solar, wind, heat pumps 9on commercial at least), but also encouraging domestic insulation etc.	Comment more relevant to Sustainability Plan. INDP deals with such matters in Policy 5. No change.
8	Ilkley Civic Society	<p>We need to include something to reflect higher support for LOCAL LISTING. I’m in discussion with BMDC conservation officers about this.</p> <p>We could “locally list” buildings not listed 1, 2* or 2 in Ilkley – ICS has a list of suggestions. BMDC has shown little appetite but</p>	Local listing is a matter for the local planning authority. CBMDC do not currently have a local list. Local listing should be pursued with CBMDC.

Reference	Respondent	Comment	Amendment
		Historic England now seem very keen for local initiatives to proceed.	
9	Resident	<p>Policies 10, 11 and map. One of the green corridors runs down Parish Ghyll and Spicey Gill. Wondering why it does not extend right down to the A65. This bottom end of the natural green corridor appears to be a bit neglected currently.</p> <p>Should this extended green corridor not be protected in some way. I am a bit surprised these small woodland areas in the town are not more protected in the overall plan.</p>	Green corridor extended.
10	Climate Action Ilkley	Proposal 10/4 – Spence Gardens is an underused area. It would be ideal to leave unmown to create a wildflower meadow with a single footpath running through it. Volunteers are available to help plant wildflowers.	This is a management issue, not a planning issue. No change to INDP.
11	Resident	<p>Policy INDP10 should include the strip of land on Beanlands Parade at the junction of Leamington Terrace as a local green space.</p> <p>This meets all the qualifying criteria stated on page 54 of the plan i.e.. in close proximity to the community it serves, holds particular local significance due to its recreational value and is local in character and not an extensive tract of land.</p>	Beanlands Parade Open Space added to INDP10 Local Green Spaces.

Reference	Respondent	Comment	Amendment
		<p>In addition it borders the cemetery plus a number of mature trees and is also adjacent to a chapel of rest.</p> <p>Policy INDP1 recognises the scout hall on Beanlands Parade, yet this is pointless if the adjoining land is not available for sporting or other activities etc. as currently used.</p> <p>Also policy INDP2/29 includes the air training corps hall on nearby Ashlands Road, but denotes this as being on said strip of land which is clearly mis-placed (notwithstanding the ATC do sometimes make use of this land themselves).</p>	
12	Number not used		
13	Resident	Policy 1 - I suggest changing "This mix should include dwellings suitable for starter homes" to "This mix must include dwellings suitable for starter homes". This will avoid developers simply ignoring this' suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination.
14	Resident	Policy 1 - Insert a requirement that new housing must be zero carbon, e.g. built according to Passivhaus standards. This will better enable housing to contribute to sustainable development which, as the government's National Planning Framework states, "... can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."	<p>The word "must" is prescriptive and will not be acceptable at examination. No change.</p> <p>Explanation added to para 2.6 and INDP5 strengthened.</p>

Reference	Respondent	Comment	Amendment
15	Resident	Policy 1 - Insert a requirement that new housing must be resilient to extreme events such as flooding and must help to mitigate such problems, e.g. through absorbent areas surrounding the housing and green roofs, etc.	These matters are addressed in Local Plan Core Strategy Policy EN7. INDP5 strengthened.
16	Resident	Policy 2 - Remove "include off-street car parking". We should not be planning the future as if reliance on the public car will be as great as it has been in the past and present. Why not bicycle parking for example? Or why not some wild land to promote biodiversity?	The policy includes the phrase "adequate car parking". This section of the policy is to manage the future development of replacement community facilities, such facilities may, but may not necessarily, require some car parking. Cycle parking added to INDP2.
17	Resident	Policy 5 - Insert a requirement that new developments must be resilient to extreme events such as flooding and must help to mitigate such problems, e.g. through external areas and roofs that soak up excess rainwater. Climate change is with us and we need to mitigate for increased rainfall.	These matters are addressed in Local Plan Core Strategy Policy EN7. INDP 5 strengthened.
18	Resident	Policy 13 - Change 'should' to 'must' in "Proposals for new development that impact on habitats and wildlife ... should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination. INDP 13 strengthened

Reference	Respondent	Comment	Amendment
19	Resident	Policy 13 - Change 'should' to 'must' in "New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination INDP 13 strengthened
20	Resident	Policy 13 - Insert 'and provide new opportunities to extend biodiversity' at end of "New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation." This will enable developers to make a positive contribution to the land rather than simply neutral.	Amended as suggested.
21	Resident	Policy 13 - Change 'should' to 'must' in "Development should not fragment the woodland canopy." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13
22	Resident	Policy 13 - Change 'should' to 'must' in "Walls and hedges should be conserved, strengthened and restored." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13

Reference	Respondent	Comment	Amendment
23	Resident	Policy 13 - Change "Additional native woodland planting of local provenance around the edges of new developments is encouraged." to "Additional native woodland planting of local provenance around the edges and within new developments must form a significant and integral component to such developments." This will strengthen this for developers from a hope to a requirement.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13
24	Resident	Policy 13 - Change 'should' to 'must' in "Hedgerow gaps should be filled with a range of native species of local provenance and hedgerow trees replanted." This will strengthen this for developers from a hope to a requirement.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13
25	Resident	Policy 5 - Insert a requirement that new developments must be resilient to extreme events such as flooding and must help to mitigate such problems, e.g. through external areas and roofs that soak up excess rainwater. Climate change is with us and we need to mitigate for increased rainfall.	No change. These matters are addressed in Local Plan Core Strategy Policy EN7. INDP5 strengthened
26	Resident	Policy 13 - Change 'should' to 'must' in "Proposals for new development that impact on habitats and wildlife ... should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination. INDP 13 strengthened

Reference	Respondent	Comment	Amendment
27	Resident	Policy 13 - Change 'should' to 'must' in "New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination. INDP13 strengthened
28	Resident	Policy 13 - Insert 'and provide new opportunities to extend biodiversity' at end of "New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation." This will enable developers to make a positive contribution to the land rather than simply neutral.	Amended as suggested.
29	Resident	Policy 13 - Change 'should' to 'must' in "Development should not fragment the woodland canopy." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13
30	Resident	Policy 13 - Change 'should' to 'must' in "Walls and hedges should be conserved, strengthened and restored." This will avoid developers simply ignoring this 'suggestion'.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13

Reference	Respondent	Comment	Amendment
31	Resident	Policy 13 - Change "Additional native woodland planting of local provenance around the edges of new developments is encouraged." to "Additional native woodland planting of local provenance around the edges and within new developments must form a significant and integral component to such developments." This will strengthen this for developers from a hope to a requirement.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13
32	Resident	Policy 13 - Change 'should' to 'must' in "Hedgerow gaps should be filled with a range of native species of local provenance and hedgerow trees replanted. II This will strengthen this for developers from a hope to a requirement.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13
33	Resident	Policy 13 - Change 'should' to 'must' in "The river and bankside environments are important wildlife habitats. Landscaping schemes should conserve and enhance wetland habitats, such as wet meadows and marshy grasslands." This will strengthen this for developers from a hope to a requirement.	No change. The word "must" is prescriptive and will not be acceptable at examination. Included in NPPF net biodiversity gain requirements in INDP13
34	Resident	Policy 14 - Change 'should' to 'must' in "proposals should seek to incorporate sustainable multi-modal transport solutions." This will strengthen this for developers from a hope to a requirement.	No change. The word "must" is prescriptive and will not be acceptable at examination.

Reference	Respondent	Comment	Amendment
35	Resident	Policy 15 - Remove 'Where appropriate' and change 'should' to 'must' in "Where appropriate all new development should include facilities for walking and cycling that are of good design and accessible to all." This will strengthen this for developers from a hope to a requirement and more accurately reflect future needs regarding sustainability, as referenced in the National Planning Framework.	No change. The word "must" is prescriptive and will not be acceptable at examination. INDP15 justification and policy strengthened
36	Resident	Policy 15 - Remove "for example around the town's schools". The current wording seems to imply that this may be required only around schools especially as schools have already been mentioned, but children, and indeed adults, need safer walking and cycling everywhere.	Amended as suggested.
37	Resident	Policy 16 - Remove 'without compromising other means of travel' in "Support will be given to proposals for dedicated cycleways where these can be provided without compromising other means of travel". The current wording implies a priority for private cars - if cycling may inconvenience motorists, then there will be no dedicated cycleway! Yet this will not always be possible and we should prioritise walking and cycling, not driving. York Council many years ago reversed priorities so that pedestrians were first, then cyclists, then public transport, then taxis, and finally the private car. Ilkley needs to adopt a similar priority hierarchy.	Final sentence of Policy 16 deleted.

Reference	Respondent	Comment	Amendment
		My comment is in line with sustainable development in the Government's National Planning Framework.	
38	Resident	<p>I believe the central car park should be made a town square like a lot of European towns have (piazza/plaza) with places to sit and enjoy meeting and talking with fountains and small trees etc. A central point with information and history (Roman/Victorian) boards. The car park should be built on top of Tesco or on the site of the refuse tip and abattoir (what town has these so centrally! Disgusting. <u>Ideally</u> there would be an underground car park like so many European towns have at their entrance,</p> <p>The new meter system is a start in the right direction to free up the town from commuters' cars left all day so shoppers can get in. one hour free instead of half an hour would be helpful.</p>	An aspirational suggestion but currently the desirability and deliverability of such a proposal is beyond the scope of the INDP. No change.
39	Resident	Policy 1 – Why does the neighbourhood plan encourage “council housing” in developments of less than 10 units. Surely Bradford should be/are trying to keep Ilkley a desirable residential area.	The policy makes no reference to specific tenures. A mix of housing is in line with national and strategic policy. No change.
40	Resident	A very comprehensive plan.	Support comment noted.
41	Resident	<p>Policy 2 - Policy INDP2 Protecting and enhancing Community Facilities</p> <p>The list of existing facilities lists most, if not all, of the town's pubs.</p>	Pubs are included because national policy seeks to protect such uses. Cafes do not benefit

Reference	Respondent	Comment	Amendment
		Some or all of the cafes should be included, I rarely use any of the pubs but regularly use the cafes.	from such a protection. No change.
42	Resident	<p>Policy 3 - Policy INDP3 Protecting and Enhancing Recreation Facilities</p> <p>I might have missed this somewhere else in the plan document, apologies if so" ...</p> <p>Please could the Plan include' the Protection and Enhancement of childrens' playgrounds - obvious examples are the one in the Riverside Gardens and the one in Ben Rhydding on Backstone Road, but there may be others, These playgrounds a vital resource for families with young children. Their value far exceeds the cost of building and maintaining them,</p> <p>I don't know how well used the skate park is, If it is well used it should also be protected.</p> <p>Someone (Bradford Council?) has spent money in Ilkley on signs for a 'fit in the park" scheme. Is this well used? If not, there needs to be some mechanism (e.g. local consultation) to ensure that the scarce funding for these types of facilities is well spent.</p>	Many of the children's' play areas are protected as Local Green Space or as part of protected recreation areas. Strengthened as suggested.
43	Resident	Policy 4 - I am not in favour of the allocation for allotments of more publicly owned land which is currently (or' could be)	Comment noted. No change.

Reference	Respondent	Comment	Amendment
		<p>accessible by the general public and certainly not any land which is in the Green Belt.</p> <p>Although there are lot~ of good points about allotments, their main benefit is to a very small number of people (the allotment holders), Land left as green space, Or e.g. allocated as a sports field, remains accessible and benefits more people.</p>	
44	Resident	<p>Policy 10 and Policy 11 - If it is not already, please add Ilkley Cemetery, and the wooded area between it and the riverbank/suspension bridge, to the list of green spaces or green corridors.</p> <p>As well as being a cemetery, it is well used by residents as a tranquil park in a way that works well with its original function as a cemetery.</p> <p>It is full of wildlife. This year the trees at the back were host to Haw Finch which I understand is quite a rare species.</p>	Cemetery added to the designated Local Green Spaces.
45	Resident	<p>Policy 18 - 1. Please include the large stone kerbstones and stone gutters which line many of the streets in Ilkley's conservations areas. These have been eroded over the years and continue to be lost. I suspect some streets have lost their stone gutters altogether to tarmac now running right up to the kerbs, and the stone kerbs have been replaced by out-of-keeping ugly</p>	<p>Point 1 – Policy amended to include “stone setts, paving stones and stone kerb edgings”.</p> <p>RB change made after 06/02/20 mtg</p>

Reference	Respondent	Comment	Amendment
		<p>modern cheap looking oklug concrete kerbstones (e.g. the area at the end of Grove Road/KingsRoad at the [unction with The Grove, and much of Parish GhyIJ Road). Other areas continue to be 'nibbled away" by contractors installing utilities and doing other small jobs e.g. at the top of Cunliffe Road outside Verity Opticians near junction with the Grove. Stretches in all. the conservation areas are affected.</p> <p>2. To better protect such features consideration could be given to obtaining Grade 2 listed status from Historic England for some aspects of this e.g, street surfaces of stone setts and cobbles, Back Grove and the area around the Manor House might be candidates,</p> <p>3. Please could the style of benches be more carefully considered for the conservation areas. As an example. an elegant Edwardian bench with ornate' cast iron ends, that used to sit at the end Rupert Road near the junction with Langbar Road. was replaced by a chunky modern, municipal-issue' bench that looks like it was made for a 1980s Shopping centre. It's good to have the bench, but not this design. By contrast, Lister Park has recently been refurbished with a large number of beautiful period style benches with cast iron ends decorated with a painted crest.</p>	<p>Point 2 – listing is not a matter for the INDP. No change. Point 3 – this is adequately addressed in the policy. No change.</p> <p>N.B. It should be noted that some changes in the public realm can be made without the need for, or because they already have approval as permitted development.</p>

Reference	Respondent	Comment	Amendment
46	Resident	<p>Policy 20 - I support the protection or employment areas.</p> <p>Parking: the recently introduced parking scheme seems to be having a mixed effect but to the detriment of shops and business, and should therefore be reviewed and substantially improved, or abandoned without delay,</p> <p>The underlying issue of parking capacity particularly for rail commuters. has not been addressed. New ideas are needed. An example recently suggested on social media was the idea that there is council owned land in the town centre which could be repurposed. The example given was the recycling centre and adjacent yard on Golden Butts Road, These facilities are good to have (though the yard seems largely empty except for a pile of grit and salt). but neither facility needs be in the town centre, This double plot is well located as the site for a commuter car park Perhaps this site is not suitable, but I have yet to see it considered, or other ideas put forward for increasing parking capacity in the town</p>	<p>Support for protection of employment noted.</p> <p>Implementation/management of this scheme is not an INDP matter. No change.</p> <p>Implementation of Park and Rail (Figure 4) lies with West Yorkshire Combined Authority. No change</p>
47	Resident	<p>Page 11 – The figure of 1,000 new homes is not consistent with the number shown in the Core Strategy Partial review which indicates 500. However the Bradford Core Strategy covers 2020 to 2037 rather than “up to 2030”.</p>	<p>The INDP must be in general conformity with the adopted Core Strategy, hence the reference to 1,000 figure. The</p>

Reference	Respondent	Comment	Amendment
		The hyperlink in the PDF version of the INDP is invalid.	Partial review is only at an early stage in its preparation and is not adopted policy. Paragraph 5.3 amended to explain this. Hyperlink removed
48	Resident	Page 19 - Paragraph 5.7 states that "growth, particularly housing growth" is a threat to community and environmental assets. What is the justification for this? I challenge the statement on the basis that: - adding new housing can improve community cohesion when done appropriately, i.e. co-housing; - the primary environmental assets are the moor, river, parks, green corridors, which should be protected, whereas logical greenfield development would take place on what is currently agricultural pasture land.	Paragraph 5.7 is describing what respondents said in response to the consultation. It is an accurate reflection of these views. No change.
49	Resident	Page 23 - Bullet 3: The use of "low carbon" in the following statement is too weak and lacks appropriate ambition for a town council who have declared a climate emergency: "Sustainability and climate change; ensuring development is sustainable and supports the transition to a low carbon future in a changing climate"	Replaced "low" with "zero".

Reference	Respondent	Comment	Amendment
50	Resident	<p>Page 11 - Objective 1, 3 - "low" carbon should be "zero" if we're in a climate emergency.</p> <p>Objective 6 - The whole of Ilkley should be made into a 20 mph zone as soon as possible. Using starting point of the zone of:</p> <ul style="list-style-type: none"> - junction of the A65 and Denton Bridge; - junction of the A65 and Victoria Avenue; - cattlegrid on Hangingstone Road; - appropriate locations in Middleton. <p>This would create a ~2 mile long 20 mph zone along the A65. The time taken to travel 2 miles at 30 mph is 4 minutes. The time taken to travel 2 miles at 20 mph is 6 minutes. Assuming the theoretical uninterrupted journey along the A65, the proposed 20 mph zone would at 2 minutes. Obviously real journeys are interrupted and therefore the increased journey time due to the 20 mph zone will be significantly less than 2 minutes. Please make the safety of our roads a priority.</p>	<p>Objective 1 amended to "and move to zero carbon design".</p> <p>Objective 6 amended to support wider introduction of 20mph zones.</p>
51	Resident	<p>Policy 1 - There is no reference to the following:</p> <ul style="list-style-type: none"> - demand for smaller developments; - build standards for all new builds: why not mandate that all new buildings and 	<p>The INDP cannot limit housing to smaller developments.</p> <p>Passivhaus cannot be mandatory.</p>

Reference	Respondent	Comment	Amendment
		<p>extensions to existing building should be build to Passivhaus standard? This approach has been taken elsewhere: https://passivehouse-international.org/index.php?page_id=50 1 - provision for self/custom builds - support/preference for co-housing: isn't enhancing the community a goal?</p>	<p>References to self/custom build and co-housing added.</p>
52	Resident	<p>Policy 1 - The Merton Rule (https://en.wikipedia.org/wiki/the_Merton_Rule) states: "... that required new commercial buildings over 1 ,000 square meters to generate at least 1 0% of their energy needs using on site renewable energy equipment."</p> <p>Why has "commercial" been dropped from the context in the INDP?</p> <p>Rather than, "Good thermal performance of buildings, including use of thermally efficient building materials, is encouraged ... " We should be aiming to mandate that all new building (including extensions) should be built to Passivhaus standards.</p> <p>Any retro-fit activity must be carried out using appropriate building materials for the property's construction, with particular emphasis on retaining the breath ability of the original construction.</p>	<p>Commercial has not been "dropped" Policy refers to BREEAM.</p> <p>The INDP cannot mandate Passivhaus be used.</p> <p>No change.</p> <p>INDP5 strengthened</p>

Reference	Respondent	Comment	Amendment
		<p>Paragraph 7.22 (page 42) states, " ... INDP5 seeks to encourage applicants for new housing development to work with prevailing standards, and, if possible, move beyond these to secure low/zero carbon development." - This statement is too weak. Applicants must work to prevailing standards anyway. Again, we should be mandating Passivhaus standards. The most important part of Passivhaus is the requirement to test buildings to ensure they meet their designed performance. A major problem for the construction industry is the "performance energy gap" as evidenced by https:// www.designingbuildings.co.uk/wiki/Performance_gap_between_building_design_and_operation</p>	
53	Resident	<p>Policy 7 - With reference to, "Contemporary and sustainable designs will be acceptable where they are of exceptional quality and where they clearly demonstrate that they are appropriate to their context." What does "exceptional quality" mean in this context? Is the goal to ensure that building are of exceptional energy efficiency and build quality, thus minimising the environmental impact, or does "exceptional quality" refer to the perception of the design?</p> <p>In order to construct highly energy efficient building at a competitive price there must be an acceptance of the fact that simple rectangular "box" shaped buildings are, by virtue of the laws of physics, more efficient. We should not be scared of contemporary designs. I imagine that at the time of the construction the Art Deco houses in Middleton there was</p>	<p>INDP7 amended to read "Contemporary and sustainable designs will be acceptable where they are of exceptional design and/or sustainable construction and where it can be clearly demonstrated that they are appropriate to their context."</p>

Reference	Respondent	Comment	Amendment
		<p>considerable eyebrow raising. Now they are seen as highly attractive by many.</p> <p>Paragraph 7.29 (page 46) makes reference to, "Mixture of building types and architectural styles." If we are to leave a mixture for the future we should not be limited by the designs of the past.</p>	
54	Resident	<p>Policy 8 - Dormer windows should follow a consistent design approach." Consistent with what? There is little or no consistency amongst the existing dormer conversions.</p>	<p>Policy says they should be "designed to retain the essential character of the Victorian and Edwardian style of architecture.". No change.</p>
55	Resident	<p>Policy 9 - The policy states, " ... preservation of the low density of built form ... " What is the justification for this? This is in direct conflict with INDP1 (h)</p> <p>The policy states, " ... uniformity of colour and texture of the built form ... " I challenge the claim of uniformity. Paragraph 7.38 goes states, "A range of building styles and ages," and, "A mixture of natural and man-made building materials which reflect the age and architectural styles of different buildings within the Conservation Area."</p> <p>There appears to be bias favouring the preservation Middleton above all other areas.</p>	<p>This policy relates to Middleton Conservation Area. The INDP includes policies for the other Conservation Areas. No change.</p>

Reference	Respondent	Comment	Amendment
56	Resident	<p>Policy 16 - "Support will be given to proposals for dedicated cycleways where these can be provided without compromising other means of travel." - Compromising other means of travel, e.g. motor vehicle, should not rule out cycleways if there is evidence that the cycleway will be well used.</p> <p>" ... key issues that adversely affect the visitor experience need to be addressed, for example infrastructure deficiencies such as car and cycle parking," (paragraph 7.65) - Is car parking really deficient if the following is applied, "All new facilities should have good access by walking, cycling and public transport"?</p>	Final sentence of Policy 16 deleted.
57	Resident	<p>Policy 13 – I am impressed with the thought and work that has gone into the document that I see as very useful. The key issues are all pertinent to concerns of the town. I think, however, the need for council and housing association housing should have greater emphasis in order to create a more balanced community. The importance placed on sustainability, ecology and the environment is very useful.</p> <p>I have grave doubts about the following:</p> <p>Policy INDP13 “development may include areas of open space extending down to the river”. In the current era of climate change I can see no reason to further develop anywhere near the river.</p>	Open space would be an acceptable use on the floodplain. No change.

Reference	Respondent	Comment	Amendment
58	Resident	<p>Proposal 10/8 - Wheatley Lane Recreation Ground</p> <p>With ref to document: Local Green Space Assessment. Existing use / culturally special/wherever it best fits:</p> <p>Please add that: - the field is set up for football during the season; i.e. it is a playing field - the field is the venue for the annual Ben Rhydding Community Fete. (Established 2006)</p>	Local Green Space Assessment amended.
59	Resident	<p>INDP1 - There is no support for co-housing, community land trusts or self build. Ilkley must support different forms of house tenure and these would all enable affordable housing provision to be built within Ilkley. This is entirely consistent with the public consultation results</p>	INDP1 amended to take account of these types of housing.
60	Resident	<p>INDP4 - This policy should include a commitment to supporting a Community Orchard, establishing more sites for community food growing and a clear commitment to creating more allotments.</p> <p>The wording must be more robust. Change <i>The INDP will seek to protect existing allotment sites for local food growing, recreation and the health and social benefits they provide.</i></p> <p>To</p>	<p>INDP4 amended to include other forms of community food growing.</p> <p>The word “must” is prescriptive and will not be acceptable at examination. No change.</p>

Reference	Respondent	Comment	Amendment
		<p><i>The INDP must protect existing allotment sites for local food growing, recreation and the health and social benefits they provide.</i></p> <p>And</p> <p><i>Policy INDP4 also seeks to encourage the provision of new allotments. Potential sites will be considered in Ilkley and Ben Rhydding. Allotments in these locations will help improve the geographic spread of allotments in Ilkley and improve local people's access to such facilities.</i></p> <p>To</p> <p><i>Policy INDP4 must increase the provision of new allotments to at least the minimum level of 225 and must increase this provision in line with population growth. Potential sites will be considered in Ilkley and Ben Rhydding. Allotments in these locations will help to improve the geographic spread of allotments in Ilkley and improve local people's access to such facilities.</i></p>	<p>Comments on geography noted. No change.</p>
61	Resident	<p>INDP5 - The language in this policy must be more robust. Change to</p> <p><i>7.22 Moving towards a zero carbon economy and adapting to challenges of climate change are central issues for the INDP. Policy INDP5 requires applicants for new housing development</i></p>	<p>This cannot be required. No change. BREEAM is for commercial buildings NOT housing.</p>

Reference	Respondent	Comment	Amendment
		to meet BREEAM excellent standards, and secure zero carbon development.	
62	Resident	<p>INDP5 - Applicants will be required to demonstrate, within the framework set by BREEAM and/or Passivhaus quote appropriate standard, how the design (e.g. siting and orientation to optimise passive solar gain), energy efficiency measures and renewable and low carbon energy generation incorporated into such housing development supports the transition to a low carbon future. New developments must generate a minimum of 10% of their energy use on-site from renewable and low carbon sources (The "Merton Rule"? Good thermal performance of buildings, including use of thermally efficient building materials, must be used to reduce fuel poverty, and ensure that local residents are able to live in warm, healthy homes which they can afford to heat. The INDP supports the retrofitting of historic buildings to improve their energy efficiency, whilst ensuring their heritage significance is protected. New housing must be capable of being adapted to meet the changing needs of occupants over time.</p> <p>New residential and commercial development must aim to meet as a minimum the relevant design category of Buildings Research Establishment BREEAM building standard 'excellent'.</p>	<p>The suggested changes are prescriptive and would not be acceptable at examination. No change.</p> <p>INDP5 strengthened.</p>

Reference	Respondent	Comment	Amendment
		<p><i>Development must include landscaping and planting of native species of local provenance, including species that encourage pollinators.</i></p>	
63	Resident	<p>INDP7 - The language in this policy must be more robust. New development in Ben Rhydding Conservation Area should be designed sensitively to ensure the special characteristics of the area are preserved and enhanced. However the absolute priority is to ensure that all new development must be zero carbon.</p> <p>Traditional materials are encouraged such as stone, render, timber and brick for elevations, stone or blue slate and red clay tiles for roofing materials, timber for windows, doors and shop fronts, and cast iron for railings and gates. Stone walls or hedgerows should be used for boundary treatments. Development should connect with existing pathways and alleyways to encourage walking and cycling and support permeable, accessible movement within the area. Long distance views out of the conservation area to the fields to the north and Ilkley Moor to the south should be protected. In residential areas where houses are set within larger gardens any backland or infill development should be sited and designed to protect existing mature garden trees, and should not lead to a significant increase in density which would be unacceptable or inappropriate in relation to the local context.</p>	<p>This policy deals with the Conservation Area. This has statutory protection. The suggested wording “absolute priority” is conflicts with this statutory protection. No change.</p> <p>The sentence “Contemporary and sustainable designs will be acceptable where they are of exceptional quality and where they clearly demonstrate that they are appropriate to their context.” Is considered to enable contemporary and sustainable design to be possible when appropriate to its context. No change.</p>

Reference	Respondent	Comment	Amendment
		Contemporary and sustainable designs will be acceptable where they are of exceptional quality and where they clearly demonstrate that they are appropriate to their context. [DELETE THIS SENTENCE]	
64	Resident	<p>INDP8 - New development in Ilkley Conservation Area should be designed sensitively to ensure the area's special characteristics are preserved and enhanced.</p> <p>However the absolute priority is to ensure that all new development must be zero carbon.</p>	This policy deals with the Conservation Area. This has statutory protection. The suggested wording “absolute priority” is conflicts with this statutory protection. No change.
65	Resident	<p>INDP9 - New development in Middleton Conservation Area should be designed sensitively to ensure the area's special characteristics are preserved and enhanced. Special attention should be paid to the preservation of the low density of built form, the inter-related relationship of buildings to large plot sizes, and the preponderance of mature landscaping and tree cover.</p> <p>However the absolute priority is to ensure that all new development and refurbishment must be zero carbon.</p>	This policy deals with the Conservation Area. This has statutory protection. The suggested wording “absolute priority” is conflicts with this statutory protection. No change.
66	Resident	<p>INDP14 - To support the development of sustainable multi-modal transport and reduce vehicle emissions development must promote active and healthy lifestyles and must help make walking, cycling and the use of public transport a first choice for all and must reduce the need to travel by private car. In particular, proposals must incorporate sustainable multi-modal</p>	The suggested changes including “must”, and to have all car parking with charging are prescriptive and would not be acceptable at examination. No change.

Reference	Respondent	Comment	Amendment
		<p>transport solutions and infrastructure which focus on emissions reduction (e.g. car parking spaces with charging facilities in accessible, convenient and safe places for plug-in and other ultra-low emission vehicles).</p> <p>Add</p> <p>The INDP promotes the use of mobility sharing schemes such as car clubs and electric bike clubs.</p>	<p>INDP14 amended to include “The INDP promotes the use of mobility sharing schemes such as car clubs and electric bike clubs.”</p>
67	Resident	<p>INDP15 - All new development must be within reasonable walking and cycling distance of community facilities and services. All new development must include facilities for walking and cycling that are of good design and accessible to all. The INDP will support sustainable travel plans, including school travel plans, and the widespread introduction of 20 mph zones and traffic calming measures to facilitate safer walking and cycling, for example around the town's schools. Proposals will be assessed against the following: a) Ease and directness of new connections to the existing footpath, bridleway and cycle path network within the development site; c) Use of sustainable materials and design that ensures access for all users; d) Where necessary, signage that is of good design, appropriate to the local context and avoids clutter; e) Designed in such a way to be safe, appropriately lit and minimise opportunities for crime; and</p>	<p>The suggested changes including “must” are prescriptive and would not be acceptable at examination. No change.</p> <p>Amended to support “the wider introduction of 20 mph zones and traffic calming measures to facilitate safer walking and cycling around the town’.</p>

Reference	Respondent	Comment	Amendment
		<p>f) Include native tree and shrub planting that is easily maintained and suitable to the route and its local context. When new routes have to be provided, these should be of good design and provide direct access to local facilities and employment opportunities.</p> <p>ADD</p> <p>Ilkley will adopt the road user hierarchy when considering the town's transport needs</p> <ol style="list-style-type: none"> 1.Disabled transport users 2.Pedestrians 3.Cyclists 4.Public Transport 5.Emergency vehicles 6.Private Car 7.Commercial vehicles 	<p>Transport hierarchy noted. No change.</p>
68	Resident	<p>INDP15 - Development of existing and new tourism and leisure facilities will be supported where such development is consistent with Ilkley's zero carbon plans and will not have a significant adverse impact on existing facilities; designated wildlife sites, European designated sites (Ilkley Moor) and, in addition, in the Green Belt, where it meets national Green Belt planning policy.</p>	<p>The suggested changes are prescriptive and would not be acceptable at examination. No change</p>

Reference	Respondent	Comment	Amendment
		All new facilities must have good access by walking, cycling and public transport. Support will be given to proposals for dedicated cycleways. where these can be provided without compromising the needs of other transport users consistent with the hierarchy.	
69	Resident	<p>INDP5 - My comment relates to the section on Sustainable Design on p40, under INDP5. The Policy states that "applicants will be required to demonstrate, within the framework set by Building Regulations, how .. , energy efficiency measures ... support(s) the transition to a low carbon future". Also "good thermal performance of buildings is encouraged ... to help reduce fuel poverty ... " I note also that regulations mean that these aspirations do not refer to developments on greenfield sites which are likely to form the bulk of the 500 new houses. The Bradford Core Strategy, which will determine the standards used for such sites, states, in Policy H09, "Subject to feasibility and / or viability, the minimum acceptable standards with reference to the Code For Sustainable Homes or any national equivalent will be: Code Level 4 from the date of adoption, and Zero Carbon Housing from 1 st April 2016" Note the use of the phrase "subject to feasibility and / or viability". Note also that the Code for Sustainable Homes has been superseded by the Home Quality Mark and it would be good to know of Bradford's plans in relation to this most recent set of BRE standards. It is encouraging that BMDC's recent publication (July 2019) <i>Homes and Neighbourhoods: A Guide to Designing in Bradford</i>, states</p>	INDP5 strengthened.

Reference	Respondent	Comment	Amendment
		<p>(Principle 3.9) "Development proposals must demonstrate how homes are designed to be energy efficient", although there is no quantification of this statement.</p> <p>I appreciate that it is difficult to go beyond what has been stated in the INDP, because of the restrictions that are placed by building regulations. However, both BMDC and ITC have declared Climate Emergencies. It seems ill-advised, to say the least, to allow the 500 new homes in Ilkley to be built with anything but the highest recommended level of thermal insulation. It is inevitable that there will be calls to improve thermal insulation on buildings in the future, but retrofitting is expensive and difficult. On new builds, this could be avoided by <u>requiring</u> developers to conform to a level of insulation compatible with a transition to zero carbon, hopefully on the timeframe of the current INDP. Of course it would also be ideal if the installation of renewable energy generation (e.g. PV) were required on construction, although that is more easily retrofitted than is insulation.</p> <p>Is it possible to engage in a discussion with BMDC to require developers to conform to such standards, given the likely high purchase price of, and developer profit on, many of the new homes in Ilkley?</p>	
70	Resident	Overall- the moves to move to net-zero and meet the UK's legally binding CO2 targets are welcomed, but not worded	INDP5 strengthened

Reference	Respondent	Comment	Amendment
		<p>sufficiently strongly to have sufficient impact. It should state that we aim to exceed these targets (net-zero by 2050 is needed globally to reach the Paris 1.5 degree target, and Ilkley is a wealthy town in a wealthy country so should reduce faster).</p> <p>Page 25 objective 5. All new home should have electric charging points. We should aim to have all homes without garages/driveways to have access to on-street charging by 2025 (to allow people to purchase electric vehicles ahead of UK banning of new fossil fuel cars (currently planned as 2040, but should be brought forward, e.g. to 2030 as suggested by CEO of Shell)</p> <p>Page 26 "6.4 Some issues cut across all these objectives e.g. moving to a low carbon future in a changing climate. Where this is the case, these cross-cutting issues are picked up by more than one planning policy in the INDP replace "moving to" with" e.g. a rapid transition to a zero-carbon future by 2050 at the latest"</p> <p>Page 29 "7.2 The single biggest issue for the future development of Ilkley," is not housing growth but "climate change, which in the next 30 years is expected to massively increase flooding, heatwaves and lead to mass migration, with greater impacts beyond that if urgent action is not taken to rapidly reduce emissions". This should recognized explicitly here ahead of the statement on housing, which is the biggest local</p>	<p>Comment noted. No change.</p> <p>Comment noted. No change.</p> <p>Charging points included</p> <p>Comment noted. No change.</p> <p>INDP5 and paras 2.10 and 2.11 strengthened.</p>

Reference	Respondent	Comment	Amendment
		<p>issue. The INDP should clearly state that "greenhouse emissions reductions should be a core principle of all decision making for Ilkley"</p> <p>Page 28, policy 1: new housing (in fact all building) should be passi haus standard. Should also require minimal hard standing and maximum grass and vegetation to absorb rain & capture carbon</p>	<p>This cannot be required. No change.</p> <p>INDP5 strengthened</p>
71	Resident	Page 39, objective 3 "community and privately-led" renewable energy (community only is insufficient)	Amended as suggested.
72	Resident	Page 42, policy 6 "Development proposals should protect, conserve, and where possible, enhance heritage assets and their settings in a manner appropriate to their significance" should note 1/; solar panels on non-listed buildings on east through south to west facing roofs in conservation areas should be supported, as long as they do not extend above roof height and are a colour chosen to match roof as close as is possible" as rapidly spinup of such renewable energy is necessary to conserve the settings of Ilkley as the impacts of climate change on that setting become more and more apparent. Similarly page 45, policy 7 & for all conservation areas	Conservation Areas have statutory protection. Where permission is required the policies in the INDP provide an adequate framework to assess proposals, including solar panels. No change.
73	Resident	Page 63, policy 13. Regeneration of natural native woodland on moor should be encouraged and not restricted	The policy is not incompatible with this comment. No change.

Reference	Respondent	Comment	Amendment
74	Resident	Page 71, policy 15. All new developments should include safe walking and cycling infrastructure. Delete "for example around schools", as this is needed everywhere. Walking and cycling must be the priority.	Amended as suggested
75	Resident	Page 72, policy 16 Remove "without compromising other means of travel". Why should cars be the priority? Vulnerable pedestrians should be the priority, then pedestrians, then bikes, then public transport, then cars. We must prioritise cycling and walking for reduced CO2, air quality, improved physical and mental health.	Final sentence of Policy 16 deleted.
76	Not used		
77	Resident	Policy 15 - Remove 'Where appropriate' and change 'should' to 'must' in "Where appropriate all new development should include facilities for walking and cycling that are of good design and accessible to all." There is no circumstance I cannot think of a circumstance where it would not be appropriate to have good facilities for walking and cycling, therefore this must be unambiguously stated.	There are circumstances when this would not apply. Change of use of an existing building, a house extension, conversion of a café to a shop. No change.
78	Resident	Policy 16 - Remove 'without compromising other means of travel' in "Support will be given to proposals for dedicated cycleways where these can be provided without compromising other means of travel". The current wording at best ambiguous and at worst could be interpreted as private cars having priority over all other means of travel. York Council, Cambridge Council	Final sentence of Policy 16 deleted.

Reference	Respondent	Comment	Amendment
		among others in England reversed these priorities so that pedestrians were first, then cyclists, then public transport, then taxis, and finally the private car. Ilkley must adopt a similar hierarchy of priorities.	
79	Resident	Policy 13 - I recommend changing 'should' to 'must' in "Proposals for new development that impact on habitats and wildlife ... should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity." This will avoid ambiguity and allow developers simply ignore policy.	The suggested changes are prescriptive and would not be acceptable at examination. No change INDP13 strengthened
80	Resident	Policy 1 - Need to insert a requirement that "new houses <u>must</u> be zero carbon (built according to Passivhaus standards)". This will ensure housing contributes to and is consistent with sustainability policies.	The suggested changes are prescriptive and would not be acceptable at examination. No change INDP5 strengthened
81	Resident	Policy 13 - Change" Additional native woodland planting of local provenance around the edges of new developments is encouraged." to "Additional native woodland planting of local provenance around the edges and within new developments must form a significant and central component to such developments." This change is necessary to ensure that the policy is actually followed, otherwise it will have no impact on developer plans.	The suggested changes are prescriptive and would not be acceptable at examination. No change. INDP13 strengthened

Reference	Respondent	Comment	Amendment
82	Resident	Page 33 - Remove "include off-street car parking". We should not be propagating and encouraging the reliance on cars. We should replace this with "include cycle parking" or "include community green spaces" or "include community wild land to promote healthy living and biodiversity". These alternatives have in other developments in the UK been shown to increase the value, desirability and sustainability of new developments, leading to architectural and development awards,	The suggested change is neither practical not feasible, No change.
83	Resident	Policy 14 - Change 'should' to 'must' in "proposals should seek to incorporate sustainable multi-modal transport solutions." In order for the policy to have any effect, the word must be definitive; leaving no room for ambiguity.	The suggested changes are prescriptive and would not be acceptable at examination. No change.
84	Resident	Policy 13 - When stipulating policies there is no point is putting 'should' as it is ambiguous. In particular, change 'should' to 'must' in "New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation." Without this change developers can simply ignore the policy.	The suggested changes are prescriptive and would not be acceptable at examination. No change. INDP13 strengthened
85	Resident	Policy 15 and 16 I generally support the Neighbourhood Plan.	The use of "will" is prescriptive. No change.

Reference	Respondent	Comment	Amendment
		<p>Specifically on traffic and transport and leisure and tourism, the approach taken is good. I am pleased that you are not recommending, having declared a climate emergency, to build new car parks - we must tackle car parking and traffic issues by increasing the use of alternative, low carbon means, particularly walking and cycling for short journeys in the town.</p> <p>My one criticism of Policies INDP15 & 16 is that they should be tightened up. When you say "new development should" or "where appropriate", you are making it much easier for people to disregard the neighbourhood plan.</p> <p>I would suggest for INDP 15 (my suggested changes in red)</p> <p>"All new development ~ will be within reasonable walking and cycling distance of community facilities and services. <u>where appropriate</u> all new development will include facilities for walking and cycling are of good design and are accessible to all. The INDP will support sustainable travel plans, including school travel plans, and the introduction of 20 mph zones and traffic calming measures where needed to facilitate safer walking and cycling, for example around the town's schools. Proposals will be assessed against the following:</p> <p><i>And at the end you state:</i></p>	<p>Amended to read "are of good design based on current best practice".</p>

Reference	Respondent	Comment	Amendment
		<p>When new routes have to be provided, these should be of good design (delete) replace with will follow best practice design standards and provide direct access to local facilities and employment opportunities.</p> <p>INDP16:</p> <p>I object to the subclause at the end of the policy "where these can be provided without compromising other means of travel". It is going to be very difficult to provide enhanced cycling facilities without compromising other means of travel. If we are going to address the climate emergency and reduce car dependence and increase cycling and walking, it is essential to have safe cycling and walking routes. These will necessarily require reallocation of roadspace, or speed reduction, or new controlled crossing of highways which are going to compromise other means of travel. Indeed, it is only when we significantly improve cycling and walking facilities and car driving for short journeys becomes less convenient that we affect big change. I strongly suggest this sub-clause should be deleted, because it effectively negates your policy.</p> <p>All new facilities should have good access by walking, cycling and public transport. Support will be given to proposals for dedicated cycleways where these can be provided without compromising other means of travel (delete).</p>	<p>Final sentence of Policy 16 deleted.</p>

Reference	Respondent	Comment	Amendment
86	Resident	Policy 1 - Page 28, policy 1: All new building should be Passivhaus standard, have solar panels (if roof area facing south / southeast / southwest is large enough to support it) and electric charging point for vehicles. Further maximum area grass and vegetation possible (to absorb rain and capture carbon), even drives should not be completely paved.	The suggested change is prescriptive. No change. INDP5 strengthened
87	Resident	Page 29, paragraph 7.2 - Page 29, 7.2: The single biggest issue for the future development of Ilkley like for every other place is climate change and not housing growth. Reductions of greenhouse gas emissions should be the main focus for all decision making for Ilkley and it should play a central role in the INDP.	INDP5 and paras 2.10 and 2.11 strengthened.
88	Resident	Policy 6 - Page 42, policy 6: Maximum possible number of solar panels on roofs of buildings also in conservation areas should be supported as long as they do not extend above roof height. This is required to achieve the UK's legally binding C02 targets.	Conservation Areas have statutory protection. Where permission is required the policies in the INDP provide an adequate framework to assess proposals, including solar panels. No change.
89	Resident	Policy 15 - Page 71, policy 15: Safe walking and cycling is required everywhere, not just around schools. These should be cycle paths off the road, an extra line on the road meaning the cyclist would have to share the space with cars, busses etc. This	INDP15 Amended as suggested.

Reference	Respondent	Comment	Amendment
		is essential so that also children can cycle to school which currently is not possible,	
90	Resident	Policy 16 - Page 73, policy 16: "Support will be given to proposals for dedicated cycleways where these can be provided without compromising other means of travel." It is essential that cycleways and foot paths take priority over roads for cars. If walking and cycling (and public transport) are not made more attractive, it will not be possible to reduce the number of cars, improve air quality and improve health and wellbeing of Ilkley residents.	Final sentence of Policy 16 deleted.
91	Resident	Policy 17 - Page 75, policy 17: Businesses should also be encouraged (made) to shut their doors during opening times so that warm air during winter stays inside the building / cold air during the summer is not lost to the outside.	Not a planning matter. No change.
92	Ilkley Civic Society	General comments Ilkley Civic Society supports the principle of a neighbourhood plan for the town and the considerable input made by the voluntary sector within the town, including some of its own members. We have taken the opportunity to ask other Civic Society members who have not been involved to look at the document with a fresh perspective to suggest improvements/ additions that may add to the document. It is unfortunate that the	General comments noted. No change.

Reference	Respondent	Comment	Amendment
		document cannot reach its full potential due to lack of information from CBMC regarding Site allocations Green Belt review Chapters 1-6 A comprehensive review of the background - no comment	
93	Ilkley Civic Society	Objective 1 Objective 1- Sustainable residential development Does the policy have to stick to a minimum of 30/ha for housing density where trees or green corridors would be preferable with a lower density? Para 7.4 to be updated to include the new 'National design Guide' pub Oct 2019 MHC&LG Para 7.5 any update on progress of Greenbelt boundary revisions by Bradford?	30 dph is only a benchmark. Different densities would be acceptable on different sites. No change. Reference to National Design Guide added.
94	Ilkley Civic Society	Objective 2	INDP2 amended as suggested.

Reference	Respondent	Comment	Amendment
		<p>INDP 2/1 to be complete does this now needs to include the 'link' building between the Church and Church House INDP 2/40 The Wheatley HOTEL INDP 2/41 Bar T'at to be correct INDP to add the word LAWN and in brackets at the end (Including GYM)</p> <p>Does the Riding School still function (indoor and outdoor) at Ben Rhydding ?</p>	<p>Ilkley Riding Centre added to INDP3</p>
95	Ilkley Civic Society	<p>Objective 3</p> <p>INDP5 refers in e) to 'innovative design' but this should include the word 'contemporary' as the two terms are different. In b) & c) 'roof tile" in mentioned but roof colour also needs adding. A particular issue on large buildings when viewed from the moor.</p> <p>Need to add a para as a variation on CBMDC Householder SPD as due to topography & layout of streets in Ilklev, rear elevations are often more visible to the public and therefore rear extensions and rear dormers need to be of a standard deemed appropriate to that for a front elevation. The SPD does allow for individual assessment but it needs to be reinforced in the np,</p> <p>Also needs to reinforce protection of 'Key Views' identified in all 3 CAA's</p>	<p>INDP5e) "contemporary" added</p> <p>Amended b and c to Roof "tile material and colour".</p> <p>Amended as suggested INDP5b)</p>

Reference	Respondent	Comment	Amendment
		<p>Sustainable Design - No reference is made to CBMDC 'Sustainable Design Guide' SPD. Under retrofitting national guidance is now available produced by 'Sustainable Traditional Buildings Alliance' but much of this advice is now incorporated in a BSI document PAS203S 'Retrofitting dwellings for improved energy efficiency' pub June 2019. No reason why the np should not be ahead of Bradford in adopting these documents. Emphasis that retrofitting a traditional property requires different solutions to that of a modern cavity walled property is required.</p> <p>Para 7.19 Designs - appears to steer design towards pastiche, not always appropriate in a historic environment, contemporary design can also 'take cues from local character'</p> <p>INDP 6 New development in Conservation Areas-</p> <p>Para 7.25 or 7.28 -the document should refer to the fact that all CBMC Conservation Area Appraisals should be updated every 5 years.</p> <p>INDP7 Ben Rhydding CA misses reference to shopfronts which are referred to in INDP8 Ilkley CA</p> <p>Para 7.29 needs to refer to CBMDC 'Shopfront SPD'</p> <p>Para 7.34 CA Appraisal not Assessment.</p>	<p>Protection of Key Views added to INDP6.</p> <p>Reference to Sustainable Design Guide and BSI guidance added in.</p> <p>Amended as suggested.</p> <p>Amended as suggested.</p> <p>Amended to add in shopfronts.</p>

Reference	Respondent	Comment	Amendment
		<p>INDP 8 refers to CA Assessment where it should be Appraisal as this is where the guidance is</p> <p>All three conservation areas contain neutral and negative areas as well as positive, the plan should include a requirement that any development should contribute towards improving the negative and neutral areas</p> <p>INDP10 Local Green Spaces-</p> <p>10/1 Memorial Gardens, Riverside to add children's play area</p> <p>10/2 East Holmes field and add Skateboard Park</p> <p>INDP 11 Green Corridors- the rail corridor should be included somewhere, whilst it will be a little less green when Network Rail have done maintenance it will still be a valuable corridor for wildlife.</p>	<p>Reference to shopfront SPD added.</p> <p>Added in correct reference.</p> <p>Added in correct reference.</p> <p>Comment noted. No change.</p> <p>Children's play area added to 10/1</p> <p>Skateboard Park added to 10/2</p> <p>Rail corridor included in Green Corridors and in Policies Map.</p> <p>INDP11 strengthened to support Local Wildlife Habitat Network</p>
96	Ilkley Civic Society	Objective 4	

Reference	Respondent	Comment	Amendment
		<p>'Net gain' is now to be written into Govt policy (since np document produced) via the Environment Bill 2019/20 confirmed in the Queens speech of October 2019 (and maybe this week's Queens Speech)</p> <p>P63 refers to Sustainable urban Drainage but deserves a separate section and reference to flooding issues particular to Ilkley</p> <p>Street trees need to be considered in this section or elsewhere to encourage their retention, replacement or in new developments. Street trees are recognised to have two major benefits in terms of reducing traffic speed and absorbing pollution.</p>	<p>Comment noted. Policy 13 includes this principle.</p> <p>Comment noted, these matters are dealt within in the Core Strategy.</p> <p>INDP5 strengthened.</p> <p>INDP5j) New paragraph on street trees added</p>
97	Ilkley Civic Society	<p>Objective 5</p> <p>Both in the introduction and Para 7.62 Car sharing schemes should be added as a positive contribution to reducing traffic.</p> <p>This objective should be the place to put on record the need for a major redesign of the central car park to provide an improved environment for all its users.</p>	<p>Amended as suggested.</p> <p>This has already happened – Summer 2020</p> <p>Amended as suggested.</p>

Reference	Respondent	Comment	Amendment
		<p>As a general rule can we suggest that all references to 'public transport' are prefixed 'integrated'</p> <p>Could we also suggest additional weight is given to the production of sustainable travel plans not just for schools but for all larger business, leisure and residential developments.</p>	<p>Amend as suggested.</p> <p>RB change after 06/02/20 mtg</p>
98	Ilkley Civic Society	<p>Objective 8</p> <p>INDP17 Ilkley Town Centre -Propose that the use of upper floors should only be if deemed proven to be underused. Many upper floors are well used as office space currently</p> <p>Para 7.70 should be LOWER Wellington Rd ?</p> <p>Para 7.72 Re earlier comment, should only be if proven as underused, loss of employment space would conflict with already acknowledged lack of employment space in Local Plan.</p> <p>P79 Primary Shopping Area appears to exclude parts of Leeds Rd and Church St ? and does not reflect the area shown in the Ilkley CA.</p> <p>INDP18 Public Realm</p>	<p>Policy does not seek to distinguish between used or unused space just that their use for a range of uses will be supported. No change.</p> <p>Amended as suggested.</p> <p>This comment conflicts with Core Strategy policy. No change.</p>

Reference	Respondent	Comment	Amendment
		<p>An objective should be to achieve a 'Design Guide' specifically written for Ilkley.</p> <p>Para 7.74 should include as the introduction does, reference to Street Lighting / particularly in view of CBMC major project to update all street lights in the district.</p> <p>INDP 19 Shopfronts</p> <p>c) External illumination is frequently not required in the well lit town centre streets.</p> <p>f) Security Grilles - to add to internal that they should be transparent so that displays can be seen.</p> <p>INDP 20 Economy and Employment</p> <p>Add protection of upper floors above retail for office use, as noted earlier.</p>	<p>Comment supported but no change needed to INDP.</p> <p>Reference added</p> <p>Comment noted. No change.</p> <p>Policy states this. No change.</p> <p>Comment noted, conflicts with Core Strategy. No change.</p>
99	Ilkley Civic Society	<p>Objective 9</p> <p>Typo- 7.83 iLkley L is missing</p> <p>P91 Typo 'Ecological networks 'should be in bold with a line space above the definition</p>	<p>Amended.</p> <p>Amended..</p>

Reference	Respondent	Comment	Amendment
100	Ilkley Civic Society	<p>Glossary</p> <p>Green Belt and Green field needed as often confused Missing definitions of all the statutory heritage protections e.g. LB's CA's SAM's etc</p>	Glossary amended as suggested.
101	Energy Group, Climate Action Ilkley	<p>Objective 3 states that "the INDP will support the development of community-led, decentralised, renewable and low carbon sources of energy". The Bradford Core Strategy {5.4.130} states that "the Council is committed to facilitating community led renewable energy generation projects." Finally, the NPPF states (para 151) "Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning."</p> <p>The Energy Group of Climate Action Ilkley is seeking to progress three renewable energy projects:</p> <p>1.A Community Energy Scheme is planned, based on investment by residents in the installation of PV panels on schools and other local amenities. Discussions with Solar for Schools and with Community Energy England have commenced and discussions with BMDC, who own several of the buildings targeted, are planned. A similar scheme is in operation in Otley.</p>	INDP5 and Renewable Energy strengthened

Reference	Respondent	Comment	Amendment
		<p>We propose, in the near future, to set up a legal company / charity structure to take this forward.</p> <p>2. We are in the process of developing a scheme to facilitate PV installations by residents, through discussions of an Ilkley-wide scheme with potential installers. While most installations do not require planning permission, some residents in the conservation zone have experienced difficulties and we plan to work with BMDC to alleviate these problems.</p> <p>3. We are investigating the establishment of a Community Energy Tariff, with a fully green electricity company, that would encourage residents to move to the use of renewable electricity. Part of the discussions will relate to a smart export guarantee that will be highly desirable for locally generated renewable energy once the feed-in-tariff ends.</p> <p>We recognise that not all of these developments relate strictly to local planning and that our own plans are still far from firm. Attempts to include developments of this sort in the INDP were rejected because there were no plans available at all. We hope that these preliminary developments have sufficient detail to allow inclusion in some form in the revised INDP. We will endeavour to take them forward as quickly as we can so that firmer details can be provided during revision and consultation with BMDC.</p>	

Reference	Respondent	Comment	Amendment
102	Climate Action Ilkley	<p>At the Climate Action Ilkley committee meeting held on Tuesday 17th December. We considered the INDP. We recognise that the INDP has been significantly changed from the earlier drafts and we are grateful for all the work that has been put into it. However, we have significant concerns about the current plan.</p> <p>Climate Action Ilkley believes that the INDP is not adequately robust in the wording of many of the policy statements. We believe that the language of the policy statements could be rephrased to ensure that they were stronger. We were impressed by Dr Hugh Ellis Policy Director TCPA when he emphasized the need to make Neighbourhood Plans as ambitious as possible - we need to change 'should' to 'must'.</p> <p>There are also places in the document where good intentions are weak or undermined by caveats such as the proposal on page 72 for dedicated cycleways "without compromising other means of travel".</p> <p>Ilkley Town Council has just passed a Climate Emergency declaration and it is therefore essential that the Neighbourhood Plan should be consistent and supportive of this declaration. The INDP in its current form does not support the Climate Emergency declaration and therefore needs to be amended to be consistent and to signal an early indication of the Town Council's intention to act in accord with the Climate Emergency declaration.</p>	<p>The word "must" is prescriptive and will not be acceptable at examination. No change.</p> <p>Final sentence of Policy 16 deleted.</p> <p>Paragraphs 2.10 and 2.11 strengthened with reference to Climate Emergency Declaration.</p>

Reference	Respondent	Comment	Amendment
		<p>We suggest that the Town Council commission Dan Stone from the CSE and/or Hugh Ellis from the TCPA to refine the policy wording in the INDP and to undertake an assessment of the rewritten version of the INDP using the CSE assessment tool. The results of the assessment should be made publicly available.</p> <p>In its current form Climate Action Ilkley would find it difficult to recommend the INDP to its members for support. We hope that we can find a way to work together to address these issues and to produce a final version of the INDP which is consistent with the ambition to become a zero carbon town.</p>	<p>INDP submitted to CSE for assessment and feedback used to strengthen INDP especially INDP5</p>
103	Theatres Trust	<p>The Trust welcomes Objective 7 as it sets out the Plan's support for Ilkley's valued cultural and leisure assets which would include its theatres -Ilkley Playhouse and King's Hall & Winter Garden - and its cinema (Ilkley Cinema). These facilities help contribute towards the social and cultural well-being of local people, as well as bringing people into the town which supports other local businesses and the vitality of the town centre.</p> <p>In turn, we therefore welcome Policy INDP2 which has a strong presumption in favour of retaining such facilities and in particular that the theatres and cinemas cited above have been listed as facilities to be protected.</p>	<p>Supporting comments noted.</p>

Reference	Respondent	Comment	Amendment
104	Natural England	<p>Natural England has no specific comment to make on the plan. The following information may be useful to refer to as the plan progresses.</p> <p>Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This contains useful information to refer to when implementing the plan and policies. This is available at: https://neighbourhoodplanning.org/wp-content/uploads/Environment-toolkit-080219-1521.pdf</p> <p>We have reviewed the Strategic Environmental Assessment and Habitats Regulations Assessment screening report and are in agreement with the conclusions. It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p>	Comments noted. No change.
105	Clive Brook Planning on behalf of	We support the 2030 Vision for Ilkley and the nine objectives of the INDP with limited qualifications. Objective 3- Cultural Landscape includes the built form of Ilkley and its surrounding	Support for Vision and Objectives noted. Comments on Green Belt noted, no change.

Reference	Respondent	Comment	Amendment
	Gladman Developments	<p>and permeating landscape, which together contribute so much to the character of the town. However the reference made to the existing adopted Green Belt should be qualified to emphasise that this is in no respect an environmental policy and that the role that the Green Belt performs is separate from the environmental qualities of the countryside. The Green Belt is essentially a development control policy mechanism with separate functional objectives, though these do have a geographical relationship and some overlap with the environmental designations and land qualities of the countryside. This distinction is very important in the Ilkley Context given the wide geographical coverage of primary environmental constraints in its surrounding countryside.</p> <p>2.2 POLICY INDP 1 - NEW HOUSING DEVELOPMENT IN ILKLEY:- The first part of this policy supports new development for housing within the built up area of the town but subject to several criteria including:- avoiding the loss of protected open or local green spaces and community facilities, not having a significantly adverse impact on heritage assets, avoiding adverse effects on the integrity of the South Pennine Moors SPA and various design and delivery criteria. We would however suggest that there needs to be a greater recognition of the limited capacity for new housing and employment development within the confines of the urban area, given the restrictions contained in this policy, the lack of suitable brownfield sites and the rate at which brownfield and garden land has been used for</p>	Comment noted. No change.

Reference	Respondent	Comment	Amendment
		<p>residential development within the town over the last 25 years. No sites in Ilkley are currently registered on Bradford's Brownfield Register.</p> <p>2.3 The current policy content on housing development in the Green Belt is as follows:- "should Green Belt sites be released these should be developed in such a way as to optimise the density of development in line with policy in chapter 11 of the NPPF." While supporting the generality of this approach it is necessary to recognise and give weight to a range of key criteria when master-planning such sites. These include the great importance of delivering net environmental gains for biodiversity, green infrastructure/public open space, pedestrian and cycle connectivity and landscaping. These and other macro design factors are emphasised in the recently adopted Bradford Housing Design Guide.</p> <p>2.4 POLICY INDP2- PROTECTING AND ENHANCING COMMUNITY FACILITIES:- This policy sets out a presumption in favour of protecting community facilities and goes on to list 52 current community facilities to which this policy will apply. We agree with this presumption.</p> <p>2.5 POLICIES INDP 3 & 4 - PROTECTING AND ENHANCING RECREATION FACILITIES & ALLOTMENTS AND COMMUNITY GARDENS:- In each case the relevant</p>	<p>Comment noted, any future development (Green Belt or not) would have to take account of and would be determined, unless material considerations indicated otherwise, against adopted planning policy at the strategic and neighbourhood plan level. No change.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p>

Reference	Respondent	Comment	Amendment
		<p>facilities are listed in the policies and we agree with the content and approach.</p> <p>2.6 POLICIES INDP 5 ENCOURAGING HIGH QUALITY AND LOW CARBON DESIGN; INDP6 - GENERAL PRINCIPLES FOR NEW DEVELOPMENT IN CONSERVATION AREAS IN ILKLEY; INDP7,8 &9 NEW DEVELOPMENT IN THE CONSERVATION AREAS OF ILKLEY, BEN RHYDDING AND MIDDLETON:-</p> <p>These policies set specific policy approaches for the acceptance and design of new development within these conservation areas, which collectively cover a large part of the urban area. We agree with the content of these policies.</p> <p>2.7 POLICY INDP 10 - LOCAL GREEN SPACES:-</p> <p>This policy seeks to protect a schedule of 17 designated Local Green Spaces. It is not clear why reference is made in this policy to "the requirement for consistency with national policy for Green Belts as many of the listed spaces are not in the Green Belt. We agree that these local green spaces should be protected and that they are important to the retention of the towns character and the health and wellbeing of its population. The designation of Local Green Spaces should be <i>achieved</i> in line with the guidance set out in Paragraphs 99-100 of the 2019 National Planning Policy Framework.</p>	<p>NPPF states that "Policies for managing development within a Local Green Space should be consistent with those for Green Belts." (paragraph 101). No change.</p> <p>Support noted.</p>

Reference	Respondent	Comment	Amendment
		<p>2.8 POLICY INDP 11- GREEN CORRIDORS:-</p> <p>Those Green Corridors shown on the policies map are "to be protected as important local landscape features." "Proposals will be encouraged which enhance and extend the existing network of Green Corridors to open spaces within the urban area." The policy contains further specific policy guidance with regard to the creation and design of new links which are to <i>avoid</i> features which are incompatible with the local countryside. Such links should not lead to an increase in recreational impacts on the South Pennine Moors SPA/SAC. The policy encourages new development "to incorporate new Green Corridors with landscaping and open space schemes and to establish links to the identified network of Green Corridors where possible."</p> <p>We support this policy and its objectives and we have identified the major contribution which the Hadfield Farm development can make to the realisation of this and other related policies in the INDP, the Bradford Local Plan and national planning policy in the NPPF (February 2019) .</p> <p>2.9 POLICY INDP12- PROTECTING ILKLEY'S LANDSCAPE CHARACTER:-</p> <p>Development proposals within the area of the INP are to give careful consideration to any potential impacts on the sensitive landscape character of the area. Where necessary development</p>	<p>Support noted.</p>

Reference	Respondent	Comment	Amendment
		<p>is to provide measures for mitigating impact through siting, design and landscaping. Long range viewpoints into and out of the site are to be considered as part of development proposals, including key landmark features such as the River Wharfe, the Cow and Calf Rocks and the Cairn viewpoint on the ridge above White Wells. The policy goes on to refer to the two main landscape character areas of Rombalds Ridge (Landscape Area 4) and Wharfedale (Landscape Area 8). The policy guidance provided for each of these Landscape Areas is based on the Landscape Character Supplementary Planning Guidance produced by Bradford Council in 2008 which remains as part of the evidence base for the Bradford Local Plan.</p> <p>We support the content of this policy and its use of Bradford Council's Landscape Character Assessment for Wharfedale (Volume 8) as an evidence base.</p> <p>2.10 POLICY INDP 13- PROTECTING AND ENHANCING BIODIVERSITY:</p> <p>Proposals for new development which impact on habitats and wildlife (as referred to in CS policies SC8 and EN2, including Local Wildlife Sites identified on the Policies Map should demonstrate how biodiversity will be protected and enhanced to achieve a net gain on current conditions. The Bradford Housing Design Guide ('Homes and Neighbourhoods: a guide to designing in Bradford') should also be considered as part of</p>	<p>Addressed in the policy. No change</p>

Reference	Respondent	Comment	Amendment
		<p>development proposals as this sets out ways in which wildlife and green features can be integrated into developments. New developments are to seek opportunities to "reverse habitat fragmentation". This is a development of policies in the CS. Detailed policy guidance is provided for wooded incline sites, the River Wharfe floodplain and moorland.</p> <p>However there is no reference to the Enclosed Pasture landscape sub type and this should be added in to the policy content and justification.</p> <p>2.11 POLICY INDP 14 - TRAFFIC AND TRANSPORT & INDP 15 Walking & Cycling:-</p> <p>INDP 14 is a general policy approach which aims to persuade developers to support the development of multi-modal transport solutions thereby reducing vehicle emissions and promoting healthier lifestyles by encouraging walking and cycling. The aim is to make non-car modes the first choice of travellers <i>wherever</i> possible. INDP 15 seeks to place new development within reasonable walking and cycling distances of community facilities and services. Well designed walking and cycling links should be incorporated into all developments. Six criteria are included in this policy aimed at achieving the design and other integral improvements within developments in order to achieve healthier lifestyles, better networks, and attractive connections to services and facilities.</p>	<p>Comments noted. No change.</p>

Reference	Respondent	Comment	Amendment
		<p>support given by this policy is conditioned by the need to avoid significant adverse impacts on existing facilities, designated wildlife sites and the internationally designated moorland habitats.</p> <p>We support the content of this policy.</p> <p>2.13 POLICIES INDP 17:- ILKLEY TOWN CENTRE; INDP 18:- PUBLIC REALM; INDP 19:- SHOP FRONTS; POLICY INDP 20 ECONOMY AND EMPLOYMENT; INDP 21 SUPPORTING THE NEEDS OF ALL:-</p> <p>We support all of these policies which seek to achieve the vitality and viability of the town centre and local economy.</p>	
106	Clive Brook Planning on behalf of landowner	Comments same as above.	See above amendments

Regulation 14 Consultation - Phase 2

Reference	Respondent	Comment	Amendments
107	North Yorkshire County Council	<p>As a neighbouring upper tier authority our principal interest is in relation to any strategic cross boundary matters.</p> <p>The NYCC <u>Council Plan</u> sets out our vision and values and identifies four key ambitions for 2023:</p> <ul style="list-style-type: none"> • every child and young person has the best possible start in life; • every adult has a longer, healthier and independent life; • North Yorkshire is a place with a strong economy and a commitment to sustainable growth that enables our citizens to fulfil their ambitions and aspirations; and • we are a modern council which puts our customers at the heart of what we do. <p>The emerging York & North Yorkshire Local Industrial Strategy seeks to promote good, inclusive and clean economic growth, The County Council's Plan for Economic Growth identifies seven key enablers to help achieve the Vision of North Yorkshire being a place with a strong economy and a commitment to sustainable growth that enables everyone to fulfill their ambitions and aspirations. It is intended that the NYCC Plan for Economic Growth will be refreshed later this year.</p>	INDP reviewed in relation to the matters referred to and strengthened in relation to carbon neutrality.

Reference	Respondent	Comment	Amendments
		<p>The North Yorkshire Strategic Transport Prospectus sets out the long term vision (to 2045) for how improved transport in North Yorkshire can contribute towards a thriving northern economy. The Strategic Transport Priorities set out within this document are:</p> <ul style="list-style-type: none"> • Improving east-west connectivity (including Trans Pennine links) • Improving access to High speed and conventional rail • Improving long distance connectivity to north and south <p>NYCC has established an aspiration for carbon neutrality by, or as close as possible to, 2030.</p> <p>Where appropriate we would encourage the Ilkley Neighbourhood Plan to recognise and align with these strategic objectives and aspirations in order to enable a joined up approach to sustainable development to be achieved.</p>	
108	Coal Authority	As you will be aware the Neighbourhood Plan area lies within the current defined coalfield. According to the Coal Authority records there are recorded risks from past coal mining activity in the form of likely historic unrecorded coal mine workings at shallow depth.	Noted. No change.

Reference	Respondent	Comment	Amendments
		We note that the Neighbourhood Plan does not allocate any sites for future development and on this basis we have no specific comments to make.	
109	Ilkley Manor House Trust	<p>INDP14 - In Castle Yard, adjacent to the Manor House, IMHT proposes the stopping up of the highway along Castle Hill and into Castle Yard, making it access only.</p> <p>IMHT supports the improvement of the A65 and New Brook Street junction to create a more pedestrian friendly environment that would enable the free flow of pedestrians through the town. The A65 currently causes community severance and venues like the Manor House, which is relatively well hidden, may suffer from this disconnect with the rest of the town.</p> <p>IMHT would also welcome the provision of additional cycle storage across the town, especially near Riverside Gardens.</p>	<p>This is a highway matter – no change.</p> <p>INDP16 strengthened</p>
110	Ilkley Manor House Trust	INDP16 - In the IMHT <u>Forward Plan 2019-2023</u> Ilkley Manor House Trust set out its ambition to work in partnership to develop a creative heritage hub in the eastern part of the town, focused around the Manor House, The Castle Collective, Riverside Gardens, but also connecting to the Playhouse and Cinema. We see an opportunity to improve the public realm and connectivity through this area to enable better pedestrian flow and movement between the sites. Closer collaboration and partnership working is already throwing up exciting cultural	INDP16 amended as follows: “Proposals for a creative/heritage hub focussed on the Manor House, The Castle Collective, Riverside Gardens, and with improved connectivity to other cultural assets, including the Playhouse and Cinema will be supported.”

Reference	Respondent	Comment	Amendments
		opportunities, and by working even more closely we think we can help to further improve the area.	
111	Ilkley Manor House Trust	<p>INDP17 - The Kings Hall and Winter Gardens, Ilkley Playhouse, Ilkley Cinema and the Manor House provide popular venues for theatre, music and other arts and literature events. Also, important to the enjoyment of the town centre are the independent specialist shops, restaurants and cafes, such as The Box Tree and Betty's that also attract visitors to Ilkley."</p> <p>In light of the comment in the line above, we suggest adding: There is an opportunity for the Cinema, Manor House, Castle Collective, and Playhouse to collaborate more closely to develop a creative heritage hub in this part of the town. This could be supported by sustainable public realm enhancements that encourage pedestrian movement and connectivity.</p>	Suggested text added to relevant parts of Background/Justification sections of INDP16 and INDP17.
112	Ilkley Manor House Trust	INDP10/7 - IMHT would be grateful if you would separate out the Manor House from this description because the house is a secular building: "All Saints Church/Manor House Land".	<p>Amended to read INDP10/7 – All Saints Church Land and Manor House Land Green Spaces</p> <p>The INDP protects the Local Green Space – the secular/religious distinctions of this area are not relevant to the complete area's value as a Local Green Space.</p>

Reference	Respondent	Comment	Amendments
113	Northern Gas	No plans for any projects in the area from a capital projects point of view.	Noted. No change.
114	Ben Rhydding Community Fete	<p>1. Objective 3, Cultural landscape INDP 10/8 Green Spaces</p> <p>Wheatley Lane Recreation Ground</p> <p>With ref to document: Local Green Space Assessment.</p> <p>Wherever fits best: e.g. Existing use / demonstrably special / other - , please add:</p> <p>Ben Rhydding Community Fete venue</p> <p>Comments:</p> <p>Wheatley Lane Recreation Ground is used as the venue for the very popular annual Ben Rhydding Community Fete. (Established 2006).</p> <p>There are no other suitable local green spaces that are located centrally within Ben Rhydding that would enable this large community event to take place with the space and safe open access that the Ben Rhydding Community Fete requires.</p>	Local Green Space Assessment amended as suggested.

Reference	Respondent	Comment	Amendments
		<p>The Fete "grew from a desire to provide a new opportunity for the community to get together, have some fun and celebrate life in Ben Rhydding" See 'About' on www.benrhyddingfete.co.uk</p> <p>The Fete is therefore also relevant to Objective 9, Social Inclusion, Policy INDP 21 - meeting the needs of all. The Fete aims to foster a sense of community and enables people of all ages, social and demographic groups to meet, but needs a suitable venue to do this. ie Wheatley Lane Recreation Ground. The latter is an essential green space that should not be developed, but preserved for the local community for a wide range of uses, including the annual Ben Rhydding Community Fete.</p> <p>2. - The field is setup for football during the season; i.e. it is a playing field</p>	Reference to Fete added under text accompanying Objective 9.
115	Friends of Ilkley Moor	Support.	Support noted. No change.
116	Canal and River Trust	Having viewed the document and the neighbourhood plan boundary in relation to our assets, I can confirm that the Canal & River Trust have no comments to make in relation to the consultation.	Noted. No change.
117	Highways England	Many thanks for the consultation regarding the Ilkley Neighbourhood Development Plan exercise, it is much appreciated. Whilst normally we would expect this consultation	Comment noted. Regulation 14 consultation is the responsibility of Ilkley Town Council not CBMDC.

Reference	Respondent	Comment	Amendments
		<p>to be received directly via the City of Bradford Metropolitan District Council, please find enclosed my response on behalf of Highways England.</p> <p>As you'll no doubt be aware, we continue to work closely with Bradford Council, and in regards to potential future development and growth in the area we therefore remain engaged in the Local Plan process (the contents of this Neighbourhood Plan, which obviously form a part thereof).</p> <p>Having reviewed what has been published, we will be interested to see how this plan contributes to the broader Local Plan aspirations for housing and employment growth in the District, and in particular any aggregated development impact which could affect the continued safe operation of the Strategic Road Network. In reality the SRN under our control and operation is very remote from the area outlined, and the detail about the quantum and scale of the development is limited to the point whereby it is not discernible as to what potential impact there could be on the continued safe operation of the M621/M62/A1 M/MI .</p> <p>Our comments on sites in the area that may have such an impact, will continue to be made to the Council as part of their higher level Local Plan considerations in the first instance. We</p>	<p>Comments on SRN and higher level plans noted. No change.</p>

Reference	Respondent	Comment	Amendments
		<p>obviously expect these will be published, shared and further debated with the individual Parishes moving forwards, by the Local Authority themselves.</p> <p>All the best with the rest of the consultation.</p>	
118	Sport England	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p>	General comments noted. No change.

Reference	Respondent	Comment	Amendments
		<p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning-applications</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p>	

Reference	Respondent	Comment	Amendments
		<p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should</p>	

Reference	Respondent	Comment	Amendments
		<p>accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design</p>	

Reference	Respondent	Comment	Amendments
		<p>and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <u>communities</u></p> <p>PPG Health and wellbeing section: <u>https://www.gov.uk/guidance/health-and-wellbeing</u></p> <p>Sport England's Active Design Guidance: <u>https://www.sportengland.org/activedesign</u></p>	
119	West Yorkshire police	<p>Having have read through the information and there are no issues that West Yorkshire Police would object to. The only point that I would comment on should there be future housing developments would be the snickets / footpaths, I note that page 46, mentions these are important features to be retained amongst within the area. Whilst I appreciate that there needs to be connectivity within new developments and healthy forms of travel, so long as footpath routes are overlooked and have good natural surveillance from any dwellings and where possible could include good lighting or maintenance of an area, there are no concerns. Any issues with footpaths mainly reflect on the design and layout of a new housing development which should work well within the existing environment to help reduce opportunities for potential crime or ASB.</p>	Comments noted. No change.