

## INDP Examiner's questions (in red) for Ilkley Town Council

*Answers given in response to Michael Wellock's recommendations and after discussion and agreement with INDP WG at 30/11/21 meeting. Cllr Ros Brown (Ilkley Town Council – Chair INDP Working Group)*

(Approved by resolution of Full Council on 06/12/21)

1. Was Natural England consulted on a draft final version of the SEA and HRA Screening Report, Version 3, November 2020?

As Ilkley Town Council received the draft final version of the SEA and HRA Screening Report, Version 3, November 2020 on 27/11/20, eight months after our Regulation 14 Consultation ended, I think Iain Cunningham at CBMDC will be better able to answer this question.

2. Having regard to the comments of Historic England, please confirm that statutory consultees were consulted under the "second round" of consultation under Regulation 14.

The Consultation list is correct in Appendix 7 of the INDP Consultation Statement.

All three statutory consultees (NE, EA and HE) were consulted during both rounds of the Reg 14 consultation. There was no change made to the INDP or any supporting documents between the first and second rounds of the Reg 14 consultation.

Below are copies of the emails and documents sent in the "first round" of consultation under Regulation 14 to the Environment Agency [REDACTED] Historic England [REDACTED] and Natural England [REDACTED]. Below these examples is my correspondence with Michael Wellock, our consultant at Kirkwells, who advised we send the emails to those named individuals.

Below these is ITC correspondence with Iain Cunningham at CBMDC regarding the second round of the Reg 14 consultation and his supplying additional email addresses for these statutory consultees and the Deputy Clerk's confirmation she had sent emails to all on the list inviting them to the second phase of the consultation.

### First phase of Reg 14 evidence below

### Email to Environment Agency

**Ilkley Neighbourhood Development Plan Reg 14 Consultation open - your response invited** admin

Fri 08/11/2019 11:46

[REDACTED]  
Ilkley SEA Report v.1 - October 2019.pdf

2 MB

Ilkley Neighbourhood Plan HRA issued.pdf

1 MB

Ilkley Neighbourhood Development Plan Reg 14 Draft Nov 2019.pdf

8 MB

3 attachments (11 MB)Download allSave all to OneDrive - ITC

Dear [REDACTED]

I am writing to inform you that the Ilkley Neighbourhood Development Plan Regulation 14 Draft Public Consultation is now open. I attach a copy of the Neighbourhood Plan for your consideration. The consultation period will run for six weeks between 7/11/19 and 19/12/19.

Also attached with the regulation 14 INDP is the updated SEA/HRA Screening. This concludes that further work on SEA/HRA is not considered necessary. This is after further work on HRA (see attached AECOM report) and the deletion of sites allocations for housing and employment from the INDP. Your views are now south on the updated screening and the conclusions therein.

We look forward to receiving your response.

Kind regards,

Louise Close

Clerk to Ilkley Town Council

[REDACTED]

## [Email to Historic England](#)

**Ilkley Neighbourhood Development Plan Reg 14 Consultation open - your response invited** admin

Fri 08/11/2019 11:48

[REDACTED]

Ilkley SEA Report v.1 - October 2019.pdf

2 MB

Ilkley Neighbourhood Plan HRA issued.pdf

1 MB

Ilkley Neighbourhood Development Plan Reg 14 Draft Nov 2019.pdf

8 MB

3 attachments (11 MB)Download allSave all to OneDrive - ITC

Dear Craig Broadwith,

I am writing to inform you that the Ilkley Neighbourhood Development Plan Regulation 14 Draft Public Consultation is now open. I attach a copy of the Neighbourhood Plan for your consideration. The consultation period will run for six weeks between 7/11/19 and 19/12/19.

Also attached with the regulation 14 INDP is the updated SEA/HRA Screening. This concludes that further work on SEA/HRA is not considered necessary. This is after further work on HRA (see attached AECOM report) and the deletion of sites allocations for housing and employment from the INDP. Your views are now south on the updated screening and the conclusions therein.

We look forward to receiving your response.

Kind regards,

Louise Close

Clerk to Ilkley Town Council



## Email to Natural England

**Ilkley Neighbourhood Development Plan Reg 14 Consultation open - your response invited** admin

Fri 08/11/2019 11:51



Ilkley SEA Report v.1 - October 2019.pdf

2 MB

Ilkley Neighbourhood Plan HRA issued.pdf

1 MB

Ilkley Neighbourhood Development Plan Reg 14 Draft Nov 2019.pdf

8 MB

3 attachments (11 MB)Download allSave all to OneDrive - ITC

Dear Merlin Ash,

I am writing to inform you that the Ilkley Neighbourhood Development Plan Regulation 14 Draft Public Consultation is now open. I attach a copy of the Neighbourhood Plan for your consideration. The consultation period will run for six weeks between 7/11/19 and 19/12/19.

Also attached with the regulation 14 INDP is the updated SEA/HRA Screening. This concludes that further work on SEA/HRA is not considered necessary. This is after further work on HRA (see attached AECOM report) and the deletion of sites allocations for housing and employment from the INDP. Your views are now south on the updated screening and the conclusions therein.

We look forward to receiving your response.

Kind regards,

Louise Close

Clerk to Ilkley Town Council

[REDACTED]

**Email correspondence with ITC's consultant Michael Wellock, Kirkwells.**

[REDACTED]

Tue 05/11/2019 13:15

To: Ros Brown

No need for printed copies - but they need to be online.

On Tue, 5 Nov 2019 at 11:50, Ros Brown <[REDACTED]>  
wrote: Michael,

Do these documents have to be available as printed copies/online with the INDP?

Ros

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Cllr Ros Brown

Ilkley Town Council Deputy Mayor  
Ilkley Town Councillor (Ben Rhydding Ward, Green)

[REDACTED]

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**From:** Michael Wellock <[REDACTED]>  
**Sent:** 04 November 2019 14:15  
**To:** Ros Brown <[REDACTED]>  
**Subject:** Strategic Environmental Assessment/Habitat Regulations

Ros,

The SEA/HRA documents are attached.

- Updated SEA/HRA
- Original SEA/HRA
- AECOM HRA

I suggest adding to any email sent to English Nature, Historic England, Environment Agency. CBMDC includes following additional text:

"Also attached with the regulation 14 INDP is the updated SEA/HRA Screening. This concludes that further work on SEA/HRA is not considered necessary. This is after further work on HRA (see attached AECOM report) and the deletion of sites allocations for housing and employment from the INDP. Your views are now south on the updated screening and the conclusions therein."

Consultation details I have for 3 statutory bodies are:

Environment Agency -



Historic England -



Natural England -



-

Any questions let e know.

Michael

**Michael Wellock Managing Director Kirkwells**

[Second phase of Reg 14 evidence below](#)

The screenshot below shows the email addresses for contacts at NE, EA and HE who we consulted during the first phase of the Reg 14 consultation (see copies of emails sent above). We received a reply from NE and no changes were made to the INDP or any supporting documents between Phase One and Phase Two of the Reg 14 consultation. We received an additional email address from Iain Cunningham (see email from Iain below) for all three statutory consultees (NE, EA and HE). These were all sent emails inviting them to take part in the second phase of the Reg 14 consultation (see email from Deputy Clerk below).



## **Progress so far**

Deputy Clerk

Tue 18/02/2020 14:23

To: Ros Brown

Hello Ros,

As you can see I have done all the updates on the website you wanted.

I have made a good start on getting out the letter and docs to the list of stat consultees. Unfortunately, I have had to leave off attaching the policy plan as with it, the size of the email was too big.

I will next be in the office on Thursday when I should be able to complete the stat consultee list.

Regards

Helen

*Helen Gibbs*

Deputy Clerk  
IlkleyTown Council

Ilkley Town Hall

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## **Update**

Deputy Clerk

Thu 20/02/2020 14:10

To: Ros Brown

Good afternoon Ros,

Just to let you know that I have emailed every consultee that I can get an address for which is listed on the spreadsheet.

A couple of emails have been returned but the majority have gone.

I shall update the spreadsheet with the contact details etc

One consultee has requested a hard copy, so I will print off and pop in tonight's post. It has to go through the Bradford mail system, so will take a couple of days longer!

Other than that, hope you are enjoying your holiday and the storm has by-passed you!

Helen

*Helen Gibbs*

Deputy Clerk  
IlkleyTown Council

Ilkley Town Hall

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Iain Cunningham [REDACTED]

Tue  
18/02/20  
20 13:01  
Reply

To: Ros Brown  
[REDACTED]

Hi Ros,

Many thanks for the e-mail regarding the second Regulation 14 consultation. I have reviewed the attachments. In relation to the list of consultees it appears to fairly comprehensive, whilst it the letter and updated webpage is clear. Just as thought, you may still get comments back from members of the public as well as the statutory bodies, therefore you should probably take them if you do. These can be fed into the process.

I note that some of the contacts are blank, therefore please find below their details:

Harrogate Borough Council: [REDACTED]

[REDACTED]  
North Yorkshire County Council: [REDACTED]

[REDACTED] Coal Authority [REDACTED]

Natural England: [REDACTED]  
Environment Agency: [REDACTED]  
[REDACTED] Historic England: [REDACTED]

It may also be worth adding:

West Yorkshire Archaeology Service: [REDACTED]  
Sport England [REDACTED]  
National Grid: [REDACTED]  
Yorkshire Water: [REDACTED]  
Northern Gas Networks: [REDACTED]  
Northern Powergrid: [REDACTED]  
Highways England: [REDACTED]  
Canal & River Trust: [REDACTED]

[REDACTED] Local GP  
surgeries the Clinical Commissioning Group  
(Airedale, Wharfedale & Craven):  
West Yorkshire Police:  
[REDACTED] and West  
Yorkshire Fire & Rescue Service:  
[REDACTED]

Internally, I will circulate it to colleagues within Development Management, Highways, Public Health, Heritage, Landscape, Public Rights of Way & Biodiversity as well as colleagues within my own team (Local Plan) who have particular policy specialisms.

Once the consultation is completed and all responses processed, it may be worth have discussion about the next stages for the plan including the timetabling.

Hope this helps. If you need to discuss anything further, please do not hesitate to contact me.

Kind regards

**Iain Cunningham** [REDACTED]  
Senior Planning Officer – Local Plan Team  
Planning, Transportation and Highways

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**From:** Ros Brown [REDACTED]  
**Sent:** 18 February 2020 10:24  
**To:** Deputy Clerk; Iain Cunningham  
**Subject:** Re: Ilkley Neighbourhood Development Plan Consultation

Helen and Iain,



Thanks Helen for sending this to Iain and thank you Iain for your phone message. Unfortunately I missed your call as I was working in another room.

I'm attaching three documents:

1. A spreadsheet of the consultee list of bodies, groups and individuals we need to invite today
2. A copy of the email to go to each of the consultees on the spreadsheet (it will need to be made clear with the groups that it's to invite a response on behalf of the group's interests not just the addressed individual) Please note a copy of the INDP **and the** Policies Map need to be attached.
3. Suggested minor amendments to be made to the town council website regarding headings - Iain are the headings ok from your/legal perspective? It's just trying to show the consultations are part of the same consultation but two parts each with a different focus.

I need to go out now but will be back after lunch. Please phone if you need any clarification on the above but if not can we crack on with getting the email invitations out?

Many thanks.

Ros

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Cllr Ros Brown

**3. Policy INDP1: Other than local green spaces, what are regarded as “protected” open spaces for the purposes of this policy?**

The protected open spaces also include the allotments and community gardens protected by Policy INDP4 of the INDP and open spaces currently protected through the Replacement Unitary Development Plan (RUDP) policies OS1, OS2, OS3, OS4, OS5 and OS6. It is acknowledged that a number of the latter policies may be superseded by policies in the INDP, should the INDP be made, or subsequently by policies in the new Local Plan.

**4. Should Policy INDP1 d) refer to heritage assets?**

Yes.

**5. Policy INDP1 e): Should the Homes and Neighbourhoods Design Guide Supplementary Planning Document be referred to in the policy?**

Yes.

**6. Policy INDP1 g) – “starter homes”: Is this an appropriate description bearing in mind the definition in the NPPF?**

Amend as follows

g) This mix should include affordable housing and dwellings that would create downsizing opportunities. Development heavily favouring houses of one size or type will not be supported;

**7. Policy INDP2: Please comment on the representations of NHS Property Services.**

Policy INDP2 does not prevent “more effective use of the health estate” or undermine “strategies to reconfigure healthcare services”. Nor is INDP2 inconsistent with paragraph 93b of the NPPF. Policy INDP2 provides enough flexibility to “support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”; the Town Council has not made been aware, during any of the consultations that there are concrete plans or proposals for the reuse of any existing NHS facilities in the neighbourhood area. Again, Policy INDP2 includes sufficient flexibility to allow for change of use should such proposals be brought forward during the plan period.

The NHS proposal seeks to place the NHS outside the scope of INDP2 – NHS community facilities would no longer be protected by planning policy the future of such facilities – if the suggested amendment were to be accepted – would be at the discretion of a non-land use “public service transformation plan”. This potentially puts them beyond planning control and rules out a wider public debate about suitable alternative uses.

Notwithstanding what has been stated above, Policy INDP2 already includes the flexibility being sought by the NHS, it allows for “alternative provision, on a site within the locality, of equivalent or enhanced facilities”; and loss where the provisions of INDP2b are met – this policy approach does not have an “harmful impact on the NHS’s ability to ensure the delivery of facilities and services for the community”

**8. Having regard to the representations of Lichfields on behalf of Craiglands Ltd, what is the justification for protecting hotels under Policy INDP2?**

As a commercial operation, not providing community facility type use, this site should be deleted from INDP2.

**9. Policy INDP2/8: In the light of the comments of Bradford Council, does the boundary of the area need to be revised?**

No. ITC understands residents in the area have contacted the Roman Catholic Diocese and been assured the car park is used and owned by the church. A boundary change would not be acceptable, the whole site, including the car park, should

remain protected under Policy INDP2. Loss of the car park would impact on the use of the church and the local road network.

ITC have objected to the inclusion of IL4/H in the emerging Local Plan and requested the current position of land ownership and size of site be checked. Based on the above the site should be amended or removed from the emerging Local Plan.

#### 10. Policy INDP5 k): Please respond to the comments of Bradford Council.

In light of the Government's response to the Future Homes Standard (January 2021, para 2.40) ITC consider CBMDC's comments are not accurate in relation to the current government position. CBMDC are still at liberty to set higher energy efficiency standards than current minimum building regulations in order to enable CBMDC and ITC to better mitigate against climate change as made public in our Climate Emergency Declarations.

*We recognise that there is a need to provide local authorities with a renewed understanding of the role that Government expects local plans to play in creating a greener built environment; and to provide developers with the confidence that they need to invest in the skills and supply chains needed to deliver new homes from 2021 onwards. To provide some certainty in the immediate term, the Government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes.*

Government's response to the Future Homes Standard (January 2021, para 2.40) The Climate Change Committee advice to central government also recommend central and local government working together in the Net Zero transition.

*"Support **local government** (with MHCLG) to play a full role in the Net Zero transition, including through increased resourcing, guidance, involvement in local area energy plans, statutory reporting on the emissions from their estate and reforming the planning framework to enable delivery of lowcarbon and climate-resilient measures.*

*This is likely to require additional funding for staffing and resources for local delivery plans, alongside a 'duty to collaborate' to encourage authorities to work with local, regional and national partners to deliver their climate ambitions.*

*Timing: 2021-23 (funding for local authorities at next Budget) **Priority recommendation**"*

(Table A1, Recommendations for Number 10 and Cabinet Office, Joint Recommendations 2021 Report to Parliament, Climate Change Committee, June 2021)

The Merton Rule is explained in the Glossary and included in the INDP as an example of how this minimum of on-site renewable energy generation has been achieved elsewhere. The INDP talks about ensuring roof orientation is good for solar power so the justification for including a minimum of regulated energy from onsite renewable energy generation equipment in 'k)' is that it makes sense in construction, financial, climate and energy terms to install (e.g. photovoltaic panels) when building from new. Combined with a fabric first

approach this ensures a reduction in carbon emissions from the outset alongside greater energy efficiency.

11. Policy INDP5 n): Should not the reference to new housing be a separate criterion?

Yes.

12. Policy INDP6: How are “key views” to be identified? Are they all identified in the Conservation Area Appraisal?

Yes. The key views and vistas are identified in the relevant Conservation Area Appraisal - <https://www.bradford.gov.uk/environment/conservation-areas/list-of-conservation-areas/>

13. Policy INDP8 – Victorian and Edwardian Suburbs: How are “visually important gaps” to be identified? Are they all identified in the Conservation Area Appraisal?

“Visually important gaps” are not identified in the Conservation Area Appraisal. Such gaps would be identified as part of the development management process.

14. Policy INDP9: How are “significant views and vistas” to be identified? Are they all identified in the Conservation Area Assessment

Yes. The key views and vistas are identified in the Middleton Conservation Area Appraisal <https://www.bradford.gov.uk/environment/conservation-areas/middleton-conservationarea/>

15. Policy INDP10: Do you regard any of the proposed sites as “extensive tracts of land”?

No.

16. Policy INDP10/8 – Wheatley Lane Recreation Ground – Land sold off for housing: Has this land been excluded from the area proposed for designation as a Local Green Space?

This is a historical not future reference and so should read:

Planning History – Part of land sold off to build homes at Emmandjay Court and Stansfield Close, now built.

17. Policy INDP10: Please respond to the comments of Bradford Council regarding sites in the Green Belt.

This comment is noted. Whilst the protections are the same – “Policies for managing development within a Local Green Space should be consistent with those for Green Belts” (NPPF, paragraph 103) – Green Belt and Local Green Space policy aims are different.

Green Belt is a strategic planning policy, the fundamental aim of Green Belt policy “is to prevent urban sprawl by keeping land permanently open” (NPPF, paragraph 137).

Local green space policy works at a non-strategic level to “allow[s] communities to identify and protect green areas of particular importance to them” (NPPF, paragraph 101). The local community have been able to identify these important spaces through the INDP and its various consultation stages.

Given the different aims of these two nationally derived planning policies there is considered to be no inconsistency in identifying designated Local Green Spaces within the Green Belt. The site specific examples quoted by CBMDC meet the national designated criteria and are demonstrably special. The INDP approach is consistent with that set out in paragraph: 010 Reference ID: 37-010-20140306 of National Planning Practice Guidance whereby within the Green Belt “Local Green Space designation could help to identify areas that are of particular importance to the local community” (op. cit.).

Nor does the designation of Local Green Spaces in the Green Belt in Ilkley compromise “local planning of sustainable development” (NPPF, paragraph 101).

#### **18. Policy INDP10/16: Please respond to the comments of Bradford Council.**

CBMDC’s position is inconsistent. Only part of the site was allocated for housing in 2005 in the RUDP, given the fact the site was never developed over such a long timescale this policy is now considered out of date. The rest of the site was protected as an open space – an allocation not inconsistent with Local Green Space policy.

Whilst the site may have been considered through the SHLAA process, this is not a planning policy document. Many sites are considered through SHLAA processes, this does not mean they are then allocated for housing. CBMDC have considered the site for the housing in the emerging Local Plan process and in their Regulation 16 submission highlight the following conclusion:

“The initial site assessment ruled it out of inclusion within the Preferred Options version of the Local Plan

(under Regulation 18) due to it being within Flood Zone 3.” Given that national planning policy states “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).

(paragraph 159, NPPF). This is a conclusion with which the Town Council would agree.

CBMDC also concede they have no evidence that the position in relation to flood risk has changed: “As part of developing the evidence base for the Local Plan, the Strategic Flood Risk Assessment (SFRA) is being updating [sic] using new flood modelling data. The results of this may impact on whether or not the site is carried forward within the Local Plan process.” We note this MAY impact on whether the site is carried forward in the Local Plan or not. The current flood risk mapping for the area shows the following:



The Town Council are of the view that it is difficult to see how a new flood risk assessment will reach a different conclusion based on the latest government published information (<https://flood-map-forplanning.service.gov.uk/confirmlocation?easting=411898&northing=447604&placeOrPostcode=Ilkley>).

CBMDC go on state in their Regulation 16 submission that:

“In addition, it should be noted that Open Space Audit (2020) identifies the site an outdoor sports facility (playing field). Emerging Local Plan policy CO1 identifies it as open space.”

Taking the latter point first, CBMDC reach the conclusion that the site should be protected as open space under Policy CO1. This is not a Local Green Space policy but protects the site as open space. The Town Council have reached the same conclusion but identified the site under INDP Policy INDP10 – Local Green Space.

The Open Space Audit 2020 (sic.) identifies the site as school playing field (IL/OS/019) - <https://www.bradford.gov.uk/Documents/BDLP/Reg18/Evidence//Open%20Space%20Audit%20Report%202021.pdf>. The Town Council are not aware of any evidence that this site is not needed for continued school sport use in the future. Indeed, it is used to support interschool sports fixtures such as the Wharfedale Primary Schools Cross Country League for the 12 local Wharfedale schools.

Despite all the evidence pointing to the contrary, and their own emerging Local Plan allocating the site as protected open space, CBMDC are seeking to keep options open and remove the INDP Local Green Space designation removed. This is inconsistent with all the available up to date evidence and, in short, an untenable position. The site should remain a designated Local Green Space.

ITC submitted a response to the emerging Local Plan which included a number of objections including to the four proposed sites for development. ITC do not know whether the School submitted a response to the Local Plan.

19. Policy INDP10 and Local Green Space Assessment. The majority of the proposed Local Green Spaces appear to be owned by Bradford Council (who will have had an opportunity to comment on the proposed designation). However, the ownership of others (10/4, 10/7, 10/13, 10/14, 10/15 and 10/18) is uncertain or involves other parties. Please identify those spaces where owners have not been consulted about designation.

Owners, where known, were contacted directly. Where not known it is not unreasonable to expect responsible landowners to be aware, through the general publicity undertaken, of planning processes affecting their land ownership.

20. Should the Policies Map be modified to delete the Local Green Space notation as applied to the wooded path from Victoria Drive to Victoria Avenue?

As there is no Local Green Space designation at this location on the Policies Map is this referring to the Policies Map using a colour OS Raster base that does have green areas identified, one of which is in this location? Please can this be clarified.

If this question refers to the following Reg 16 submission then ITC wish to make the following recommendation.

**All Representation: Ilkley Neighbourhood Development Plan (Regulation 16) July 2021**

**Consultation point:** Policy INDP10: Local Green Spaces

**Representation ID:** 28663

**Comment Type:** Comment

**Respondent:** 6961

**Agent:**

**Summary:**

The LGS does not include smaller local community green spaces to the East and West of the town which are vital as green spaces for residents and play areas for children. As an example, the designated informal play area which leads from the back of Easby Close to Victoria Avenue, is marked on the Policies Map but is not included as an LGS. In addition, the wooded path from Victoria Drive to Victoria Avenue is marked on the Policies Map, but is not included as an LGS. The Draft Bradford District Local Plan - Preferred Options, makes specific reference in section 5.17.31 to the deficits in the West and South East for park and play area provision and therefore these two areas should be included in the LGS as a minimum.

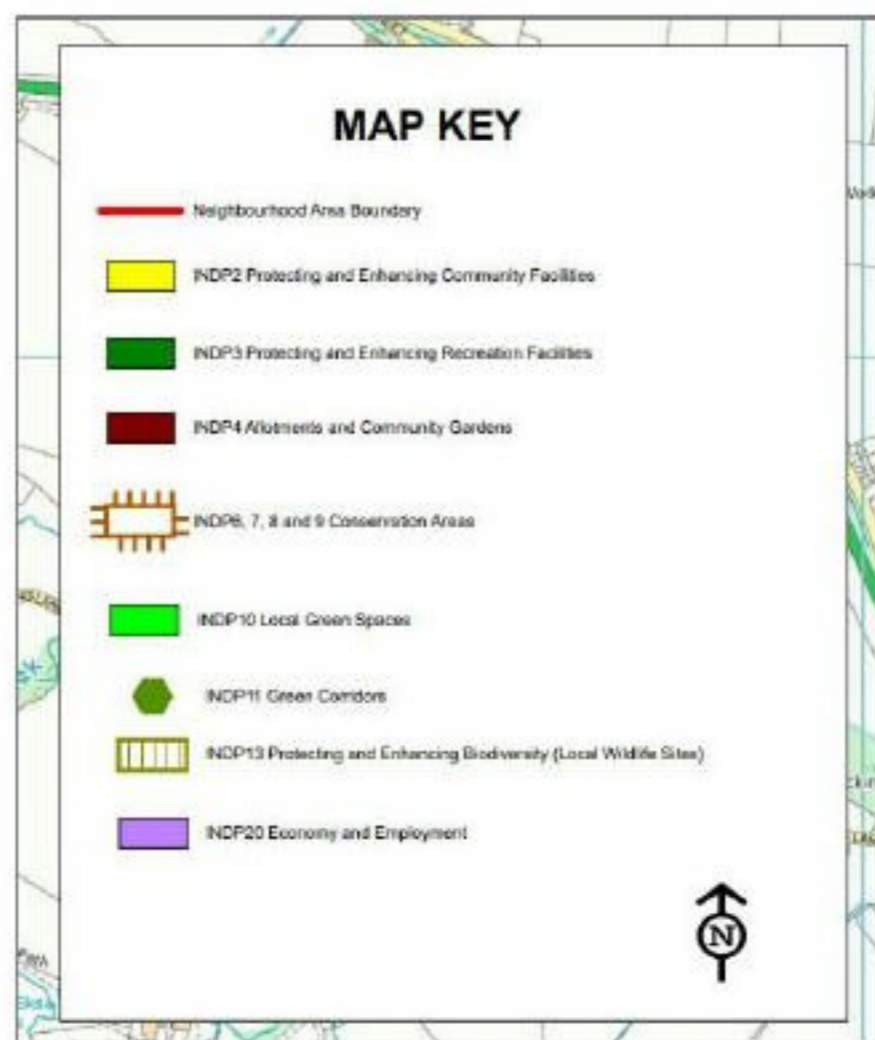
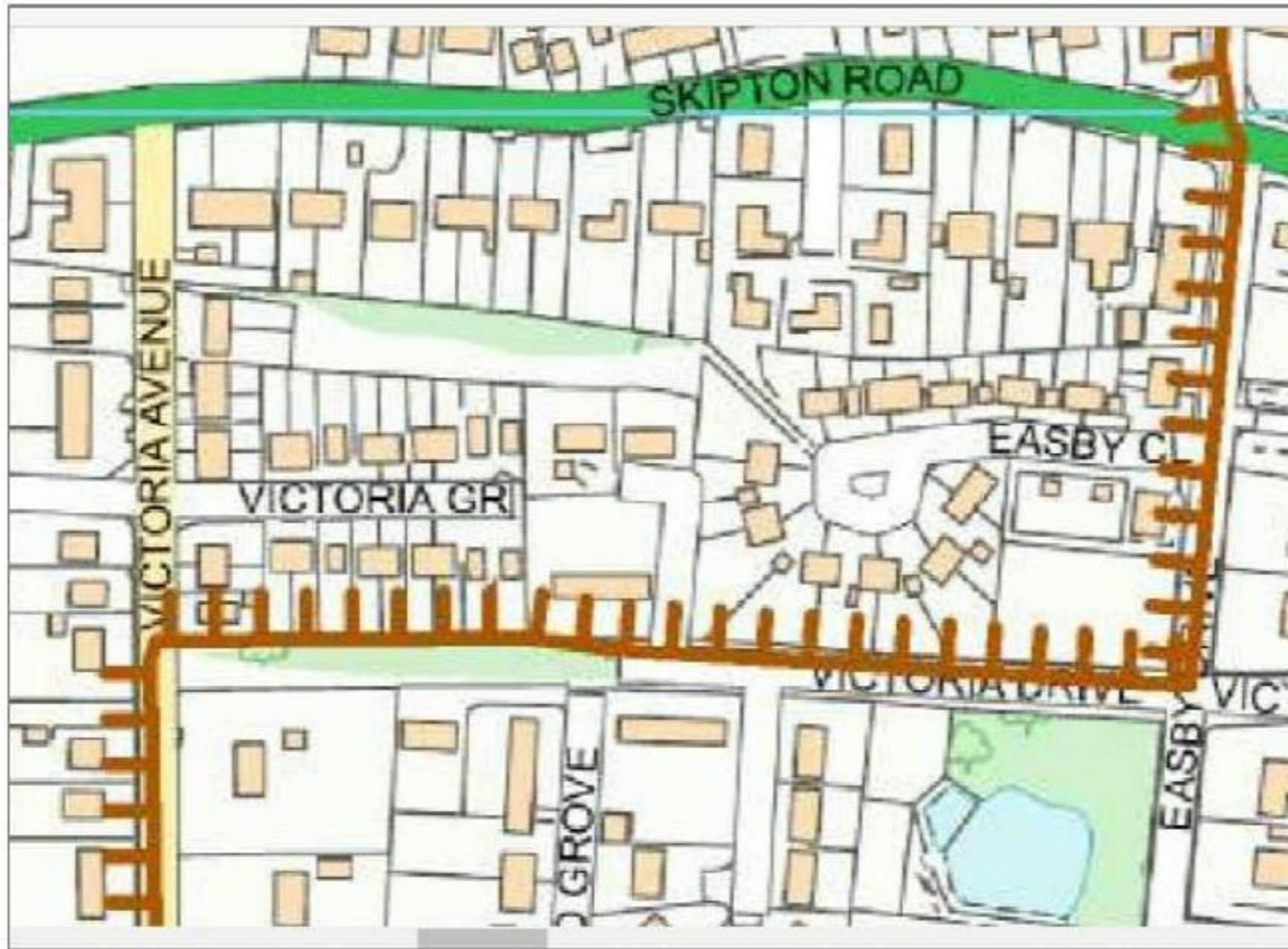
**Full Submission:**

The LGS does not include smaller local community green spaces to the East and West of the town which are vital as green spaces for residents and play areas for children. As an example, the designated informal play area which leads from the back of Easby Close to Victoria Avenue, is marked on the Policies Map but is not included as an LGS. In addition, the wooded path from Victoria Drive to Victoria Avenue is marked on the Policies Map, but is not included as an LGS. The Draft Bradford District Local Plan - Preferred Options, makes specific reference in section 5.17.31 to the deficits in the West and South East for park and play area provision and therefore these two areas should be included in the LGS as a minimum.

As CBMDC is the land owner for both these Local Green Spaces ITC recommends inclusion of these sites a) and b) in INDP10 and the Policies Map.

- a) the designated informal play area which leads from the back of Easby Close to Victoria Avenue
- b) the wooded path from Victoria Drive to Victoria Avenue.





Below are photos of both LGS a) and b) taken on 1/12/21.

Photograph of LGS a)



Photograph of LGS b)



**21. Policy INDP14 – multi-modal transport: Please respond to the comments of Bradford Council.**

The Town Council agrees that this is a confusing use of terminology, it is suggested “multi-modal is replaced with “sustainable, diverse transport modes”.

**22. Does Paragraph 5.81 require amendment?**

Paragraph 5.81 should be deleted. A new preamble should be inserted ahead “Supporting Town Council Actions – Ilkley Town Centre Traffic and Car Parking”: “The following Supporting Town Council Actions set out how the Town Council could help manage and improve car parking in the town. This policy is not a planning policy of the INDP, this is a set of supporting actions that the Town Council will seek to influence the relevant bodies to implement.” This would be a new paragraph 5.84, all subsequent paragraphs would need to be renumbered.

### 23 Policy INDP20: Please respond to the comments of Bradford Council.

The Town Council agrees the opening sentence of Policy INDP20 should be amended to “The following existing employment areas, falling within Use Classes B2, B8 and E(g) will be protected for employment uses:..”

INDP20 should also set out the circumstances under which the change of use/loss of any of the sites/premises listed will be permitted. The suggested wording from the Steeton, Silsden Eastburn NDP is acceptable:

“Planning approval for uses outside of the above will only be supported when it meets the criteria in Policy EC4 of the Local Plan Core Strategy.”

CBMDC’s comments on change of use are noted.

Policy INDP20 by protecting the town’s key existing employment areas is consistent with the approach set out in LPCS Policy EC4 that seeks to refuse “Planning Permission for the alternative development, including piecemeal development, of land and buildings currently or last in use for business or industrial purposes. The approach in INDP20 also supports other strategic planning policies of the LPCS that seek to promote investment in Ilkley as a Principal Town (Policy EC1); and Policies EC2 and EC3 that seek to create 1,600 jobs annually in the District and bring forward further employment land.

### Question for Ilkley Town Council and Bradford Council

### 24 A revised version of the National Planning Policy Framework was published by the government on 20 July 2021 alongside a final version of the National Model Design Code. I would be grateful if you could please advise me whether you consider any modifications in relation to the non-strategic matters covered by the draft Ilkley Neighbourhood Development Plan are necessary as a result of the publications (other than amended referencing) and, if so, what these are?

The revised NPPF does not raise any significant issues for the INDP. References to the NPPF and NPPG in the INDP should be amended to take account of any changes in the NPPF affecting the text of the INDP, such as the change in paragraph numbers relating to Local Green Space designation.

The INDP does not propose a Design Code, reference to the National Model Design Code could be made within the INDP.

ENDS