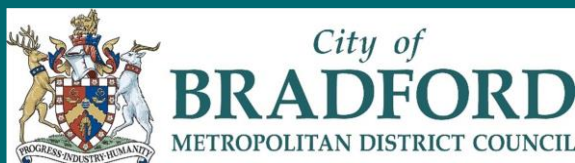


Ilkley Neighbourhood Development Plan

REGULATION 16 CONSULTATION (JULY TO SEPTEMBER 2021)

SUMMARY OF REPRESENTATIONS RECEIVED



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1. GENERAL COMMENTS

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The post examination/referendum draft of the plan should be reviewed and updated to ensure that its wording is up-to-date reflecting that stage of the plan. Similarly, the post-referendum (adoption) version should be updated.</p> <p>The numbering of the figures should be updated.</p>			
Full Submission:			
<p>The post examination/referendum draft of the plan should be reviewed and updated to ensure that its wording is up-to-date reflecting that stage of the plan. Similarly, the post-referendum (adoption) version should be updated.</p> <p>The numbering of the figures should be updated.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>References in the plan to the National Planning Policy Framework should be checked/clarified as the 2021 version has now been published.</p>			
Full Submission:			
<p>References in the plan to the National Planning Policy Framework should be checked/clarified as the 2021 version has now been published.</p>			

Consultation point:	General Comment		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
<p>The plan as a whole could benefit from providing links to the relevant Core Strategy policies. This will allow readers to understand how the plan's policies are linked to the wider strategic planning policy context. Therefore, following each policy a box/table should be included in the document set out the Core Strategy policies relevant to the it</p>			
Full Submission:			
<p>The plan as a whole could benefit from providing links to the relevant Core Strategy policies. This will allow readers to understand how the plan's policies are linked to the wider strategic planning policy context.</p>			

Therefore, following each policy a box/table should be included in the document set out the Core Strategy policies relevant to the it

2. FOREWARD

Consultation point:	Foreward		
Representation ID:	24141	Comment Type:	Object
Respondent:	1438	Agent:	-
Summary:			
<p>I object to the development proposal IL1/H (Ben Rhydding).</p> <p>The development is on Green Belt Land (itself objectionable) and, along with the Wheatley Lane/Coutances Road development, would destroy the nature of the area; the many brownfield sites in Bradford are more appropriate for the demographic and sustainability; the density would be an eyesore from such as the popular touristic Cow and Calf beauty spot; the compensation for eating into Green Belt could not be undertaken from the Ilkley area; the site is part conservation area.</p> <p>The development sustainability seriously impinges on ALL the council's six rules for Approval. Its density will create further chaos under the single lane railway bridge on Wheatley Lane, and especially on and for A65 accessibility.</p> <p>The land is a local haven for wildlife, supporting and protecting many species.</p> <p>The council acknowledges many reasons for not allowing this development but appears to ignore its own advice.</p>			
Full Submission:			
<p>I object to the development proposal IL1/H (Ben Rhydding).</p> <p>The development is on Green Belt Land (itself objectionable) and, along with the Wheatley Lane/Coutances Road development, would destroy the nature of the area; the many brownfield sites in Bradford are more appropriate for the demographic and sustainability; the density would be an eyesore from such as the popular touristic Cow and Calf beauty spot; the compensation for eating into Green Belt could not be undertaken from the Ilkley area; the site is part conservation area.</p> <p>The development sustainability seriously impinges on ALL the council's six rules for Approval. Its density will create further chaos under the single lane railway bridge on Wheatley Lane, and especially on and for A65 accessibility.</p> <p>The land is a local haven for wildlife, supporting and protecting many species.</p> <p>The council acknowledges many reasons for not allowing this development but appears to ignore its own advice.</p>			

Consultation point:	Foreword		
Representation ID:	29804	Comment Type:	Comment
Respondent:	4687	Agent:	-
Summary:			
<p>Given that new housing is inevitable on green field sites around Ilkley, can we at least insist that new developments are required to plant tree-lined streets in keeping with the character of the town, rather than</p>			

the completely bare developments that have sprung up all around us. If these sites were not previously used as pasture they would be covered in trees. Trees will also go some way to offset the carbon footprint of all that concrete.

Full Submission:

Given that new housing is inevitable on green field sites around Ilkley, can we at least insist that new developments are required to plant tree-lined streets in keeping with the character of the town, rather than the completely bare developments that have sprung up all around us. If these sites were not previously used as pasture they would be covered in trees. Trees will also go some way to offset the carbon footprint of all that concrete.

Consultation point:	Foreword		
Representation ID:	29805	Comment Type:	Comment
Respondent:	Ilkley Labour Party [7020]	Agent:	

Summary:

The Ilkley Branch of the Labour Party discussed the plan and agreed this response. Overall, we commend the proposals and had some points to add, with no major criticisms. The proposal covers well many of the major concerns for residents, including housing, roads and transport, the environment and businesses. We recognise the particular features that affect decisions on Ilkley. One implication is that building is likely under current and foreseeable planning regulations to result in more expensive housing, which does not satisfy the needs of those who work in Ilkley's services and businesses and which would if anything result in further imbalance as well as potential environmental damage. Identifying boundaries and keeping inside is important (Inspectors Report, 1988). Support for increased pedestrianization and of environmental measures was strong. We hope that the Plan is successful.

Full Submission:

The Ilkley Branch of the Labour Party has discussed and agreed the following comments on the Neighbourhood Plan. Overall, this is a positive and constructive proposal with a strong focus on the needs of residents and the environment. There are proposals relevant to the function of the town as a tourist destination and on business. There is material on housing and proposals for building given the requirements from central government to build new housing. One further proposal is to designate the Eastern boundary of the town a permanent feature, as recommended by the Inspectors report of 1988, confirming it as a "strong and defensible boundary". The terrace of large Victorian houses (along with the Georgian farmhouse) clearly heralds the fact that it is an entrance to a Spa town of late Georgian and Victorian significance, architecturally and historically. Even more ambitious, but more protective in the future would be a campaign to designate more clear boundaries around the town as a whole, protecting the landscape, green field sites and preventing sprawl that would make it hard to pursue environmentally friendly policies such as pedestrianizing. The issue of affordable housing is significant for the town and the high level of house prices makes affordable very different from most of the authority. This has several effects, including the difficulty experienced by younger people who have grown up in the town in finding affordable housing locally, either to buy or to rent. Supposedly affordable housing in Ilkley is still likely to be over 50% higher than average house prices across

Yorkshire and nationally. People who provide essential services or who are employed in the town on relatively low wages also find it hard to afford to live in Ilkley and must commute. Much of the cheapest housing is in complexes for retired older people, which is of no help to younger people looking to purchase or rent a first home and for working adults, while these lower prices artificially depress the average prices of property locally.

We recommend a survey and a review of policy on building and housing. Possible solutions might be to include more The demographics of the town point to issues for the future, which need emphasis in the neighbourhood Plan. Older people use more health and social services, and services for them offer low paid employment, indicating some potential for a vicious circle of increasing need and difficulty in provision. New building of family homes may make more demands on education as well as childcare and health services. The plans for keeping up with the need for these need to be linked into the processes for development before further expansion begins.

The Victorian infrastructure, including sewers, water, gas and electricity are likely to be stretched by new developments, putting areas at risk of loss of service and even flooding. The plans for the maintenance and expansion or renewal of infrastructure needs to be an early part of any planning to develop the town.

Local traffic, parking and road markings are all of concern to many Ilkley residents and a review of these to support environmentally friendly travel is welcome. This might include consideration of an increased off-set for the Brook Street crossing and the way that parking places are protected by inserts along the Grove.

The Clean River campaign has been successful, although early testing of water quality indicates that it is poor. The remedies for this are likely to involve coordination with other areas and action more widely along the Wharfe.

We recognise the interaction between different levels of government and that sometimes policy locally is overridden by forces from elsewhere. However, we commend the plan and hope that it serves to promote the quality of life and environment in Ilkley."

Consultation point:	Foreword		
Representation ID:	29829	Comment Type:	Support
Respondent:	Ilkley Manor House Trust [7031]	Agent:	-
Summary:			
<p>I am writing on behalf the Ilkley Manor House Trust board of trustees to express our support for the proposed Ilkley Neighbourhood Development Plan (INDP).</p> <p>As one of the groups affected by this Plan, and thanks to the consultation led by the Town Council, we have been engaged fully and feel confident that the INDP has the potential to address the needs and serve the aspirations of our local community.</p>			
Full Submission:			
<p>I am writing on behalf the Ilkley Manor House Trust board of trustees to express our support for the proposed Ilkley Neighbourhood Development Plan (INDP).</p> <p>We commend the work undertaken by the Ilkley Neighbourhood Development Plan Working Group led at different stages by Town Councillors Brian Mann and Ros Brown with the help of Kirkwells.</p> <p>As one of the groups affected by this Plan, and thanks to the consultation led by the Town Council, we have been engaged fully and feel confident that the INDP has the potential to address the needs and serve the aspirations of our local community.</p> <p>Ilkley Manor House Trust is committed to supporting Bradford MDC and Ilkley Town Council in delivering against policies INDP2 and INDP16 in particular, playing our part in developing tourism and leisure facilities.</p>			

Our vision is to work in partnership to nurture a creative/heritage hub focused on the Manor House, The Castle Collective, Riverside Gardens, All Saints and with improved connectivity to other cultural assets, including the Playhouse and Cinema.

This could be supported by sustainable public realm enhancements that encourage pedestrian movement and connectivity most notably around the A65 New Brook Street junction, but also connecting the Playhouse to the Manor House and Park via sustainable urban design.

We would like to suggest a minor amendment to the text in the Plan to include All Saints Church in the description of the creative heritage hub so that it reads: “...creative/heritage hub focused on the Manor House, All Saints Church, the Castle Collective, Riverside Gardens”

We embrace the principle of NDPs which are part of the development plan and carry “statutory weight” when planning decisions are made. We also welcome the fact that NDPs give local people the final say on the plan for the area through a referendum.

Finally, we note that NDPs can bring a financial benefit to an area and that CBMDC have introduced a levy on future development called the Community Infrastructure Levy (CIL). We are pleased to read that if Ilkley has a finalised INDP the town will receive 25% of any CIL collected in the area. We hope that Ilkley Manor House will be considered for contributions in the event of CIL allocations in future.

We hope that if this plan is adopted, we can all use it to support the future development of Ilkley to best serve the needs of current and future generations.

3. CHAPTER 1 - INTRODUCTION

Consultation point:	1. Introduction		
Representation ID:	29820	Comment Type:	Comment
Respondent:	Highways England (Yorkshire & North East Team) [4772]	Agent:	
Summary:			
<p>There is little formal comment to make at this point on behalf of the Secretary of State for Transport, and their primary interests.</p> <p>It remains that the operation of the Strategic Road Network in the locale, is reviewed and highlighted to the local authority as part of the consultation work I undertake directly with them. I have reviewed the Neighbourhood Plan document, and taken regard therein of the absence of specified sites for major housing or employment development zones which seems in keeping with the ethos of sustaining the current “setting” of Ilkley.</p> <p>At this time, I have no evidence to support that the Neighbourhood Plan (as proposed) would have a significant impact to the continued safe operation of the SRN. Highways England will however remain vigilant to the aggregated impact of all local Parish aspirations, when determining our position on the Local Plan for Bradford Council, now, and in the future.</p>			
Full Submission:			
<p>Many thanks for the consultation which I received earlier today, regarding the Ilkley Neighbourhood Development Plan consultation.</p> <p>Whilst gratefully received, having now reviewed the documentation on your website (and being mindful of the extensive Local Plan work I have already undertaken with Bradford Council), there is little formal comment to make at this point on behalf of the Secretary of State for Transport, and their primary interests.</p>			

It remains that the operation of the Strategic Road Network in the locale, is reviewed and highlighted to the local authority as part of the consultation work I undertake directly with them. I have reviewed the Neighbourhood Plan document, and taken regard therein of the absence of specified sites for major housing or employment development zones, which seems in keeping with the ethos of sustaining the current “setting” of Ilkley.

At this time, I have no evidence to support that the Neighbourhood Plan (as proposed) would have a significant impact to the continued safe operation of the SRN. Highways England will however remain vigilant to the aggregated impact of all local Parish aspirations, when determining our position on the Local Plan for Bradford Council, now, and in the future.

Consultation point:	1. Introduction		
Representation ID:	29828	Comment Type:	Comment
Respondent:	The Coal Authority [95]	Agent:	
Summary:			
<p>According to the Coal Authority records there are recorded risks from past coal mining activity within the area in the form of likely historic unrecorded coal mine workings at shallow depth.</p> <p>We note that the Neighbourhood Plan does not propose to allocate any sites for future development and on this basis we have no specific comments to make.</p>			
Full Submission:			
<p>Thank you for the notification of the 16 July 2021 consulting the Coal Authority on the above Neighbourhood Development Plan.</p> <p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield.</p> <p>According to the Coal Authority records there are recorded risks from past coal mining activity within the area in the form of likely historic unrecorded coal mine workings at shallow depth.</p> <p>We note that the Neighbourhood Plan does not propose to allocate any sites for future development and on this basis we have no specific comments to make.</p>			

Consultation point:	1. Introduction		
Representation ID:	29848	Comment Type:	Comment
Respondent:	National Grid [7035]	Agent:	Avison Young [7033]
Summary:			
<p>We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.</p>			
Full Submission:			
<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p>			

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NNG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid’s assets.

Consultation point:	1. Introduction		
Representation ID:	29849	Comment Type:	Comment
Respondent:	Natural England [7036]	Agent:	
Summary:			
<p>Natural England is not able to fully assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes or, provide detailed advice on the application. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.</p> <p>The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.</p> <p>Generic advice is provided in the Annex in the submission</p>			
Full Submission:			
<p>Natural England is not able to fully assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes or, provide detailed advice on the application. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.</p> <p>The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the</p>			

environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Generic advice is provided in the Annex attached.

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. Our initial screening indicates that one or more Impact Risk Zones have been triggered by the proposed development, indicating that impacts to SSSIs are possible and further assessment is required. You should request sufficient information from the developer to assess the impacts likely to arise and consider any mitigation measures that may be necessary.

Air quality impacts on SSSIs

The interest features of affected designated sites may be sensitive to impacts from aerial pollutants, To determine any likely air quality impacts arising from this proposal, an initial screening for air quality impacts should be completed. Simple screening tools are available via the internet, such as the Simple Calculation of Atmospheric Impact Limits (SCAIL) model: <http://www.scail.ceh.ac.uk/>. The results of this screening should inform the need for any further, more detailed assessment which may be required to fully assess the impacts of the proposal.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Protected Species

Natural England has produced standing advice^[1] to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found here^[2]. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected landscapes

For developments within or within the setting of a National Park or Area of Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a "test" to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance. Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of "best and most versatile" agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people’s access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Consultation point:	1. Introduction		
Representation ID:	29909	Comment Type:	Comment
Respondent:	Homes England [7048]	Agent:	
Summary:			

It is confirmed that Homes England does not wish to make any representations on the consultation documents at this stage.

Full Submission:

I would firstly like to thank you for the opportunity to comment on the Ilkley Local Plan Update Scoping Consultation 2021.

In this instance, Homes England is responding in its capacity as a “consultation body”, which is defined in Schedule 1 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

Homes England is the government’s housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we’re making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

It is confirmed that Homes England does not wish to make any representations on the consultation documents at this stage.

We look forward to continuing to engage with you in the future and will consider any further consultation requests, as appropriate.

Consultation point:	1. Introduction		
Representation ID:	29994	Comment Type:	Comment
Respondent:	Historic England [101]	Agent:	

Summary:

We note that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012.

We therefore do not wish to comment on proposed Neighbourhood Plan until such time as we have had the opportunity to comment on, and contribute to the Regulation 12, Pre submission draft of the Neighbourhood Plan.

Full Submission:

Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan.

We note that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012.

We therefore do not wish to comment on proposed Neighbourhood Plan until such time as we have had the opportunity to comment on, and contribute to the Regulation 12, Pre submission draft of the Neighbourhood Plan.

4. CHAPTER 2 – WHY PREPARE A NEIGHBOURHOOD PLAN FOR ILKLEY

Consultation point:	2. Why prepare a Neighbourhood Plan for Ilkley?		
Representation ID:	29824	Comment Type:	Comment
Respondent:	Clive Brook Planning [536]	Agent:	

Summary:
A policy on Climate Change should be added to the INDP as advocated by the RTPi and the Committee on Climate Change and given the Government’s emphasis on neighbourhood planning and the need to include actions to mitigate and adapt to these changes at the community level.
Full Submission:
<p>I refer to your e-mail sent yesterday and would like to make the following formal comments on the submitted draft.</p> <p>The INDP should include either a sub policy to INDP 20 Economy and Employment, or a separate new policy, to require the provision of a new employment site in the form of a business park to meet the requirement in Wharfedale for a circa 5 hectares employment site. It is wholly appropriate that this provision should be made in or adjacent to the Principal Town given the policy content of the adopted CS and the emerging draft Local Plan. While a specific allocation cannot be made in the INDP until the appropriate stage has been reached on the adoption of the Local Plan the policy principle should be established at community level now. There is significant latent demand for such new employment space and it is important to realise the economic development strengths of Ilkley. I have previously made submissions to the draft Local Plan process advocating the location of a new business park to the east of Ilkley on Council owned land but have received no previous acknowledgment of my submissions.</p> <p>A policy on Climate Change should be added to the INDP as advocated by the RTPi and the Committee on Climate Change and given the Government’s emphasis on neighbourhood planning and the need to include actions to mitigate and adapt to these changes at the community level.</p>

Consultation point:	2. Why prepare a Neighbourhood Plan for Ilkley?		
Representation ID:	29832	Comment Type:	Comment
Respondent:	Ilkley Manor House Trust [7031]	Agent:	

Summary:
Finally, we note that NDPs can bring a financial benefit to an area and that CBMDC have introduced a levy on future development called the Community Infrastructure Levy (CIL). We are pleased to read that if Ilkley has a finalised INDP the town will receive 25% of any CIL collected in the area. We hope that Ilkley Manor House will be considered for contributions in the event of CIL allocations in future.
Full Submission:
<p>I am writing on behalf the Ilkley Manor House Trust board of trustees to express our support for the proposed Ilkley Neighbourhood Development Plan (INDP).</p> <p>We commend the work undertaken by the Ilkley Neighbourhood Development Plan Working Group led at different stages by Town Councillors Brian Mann and Ros Brown with the help of Kirkwells.</p> <p>As one of the groups affected by this Plan, and thanks to the consultation led by the Town Council, we have been engaged fully and feel confident that the INDP has the potential to address the needs and serve the aspirations of our local community.</p> <p>Ilkley Manor House Trust is committed to supporting Bradford MDC and Ilkley Town Council in delivering against policies INDP2 and INDP16 in particular, playing our part in developing tourism and leisure facilities. Our vision is to work in partnership to nurture a creative/heritage hub focused on the Manor House, The Castle Collective, Riverside Gardens, All Saints and with improved connectivity to other cultural assets, including the Playhouse and Cinema.</p>

This could be supported by sustainable public realm enhancements that encourage pedestrian movement and connectivity most notably around the A65 New Brook Street junction, but also connecting the Playhouse to the Manor House and Park via sustainable urban design.

We would like to suggest a minor amendment to the text in the Plan to include All Saints Church in the description of the creative heritage hub so that it reads: “...creative/heritage hub focused on the Manor House, All Saints Church, the Castle Collective, Riverside Gardens”.

We embrace the principle of NDPs which are part of the development plan and carry statutory weight when planning decisions are made. We also welcome the fact that NDPs give local people the final say on the plan for the area through a referendum.

Finally, we note that NDPs can bring a financial benefit to an area and that CBMDC have introduced a levy on future development called the Community Infrastructure Levy (CIL). We are pleased to read that if Ilkley has a finalised INDP the town will receive 25% of any CIL collected in the area. We hope that Ilkley Manor House will be considered for contributions in the event of CIL allocations in future.

We hope that if this plan is adopted, we can all use it to support the future development of Ilkley to best serve the needs of current and future generations.

Consultation point:	2. Why prepare a Neighbourhood Plan for Ilkley?		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	-
Summary:			
Local Planning Authorities are required by statute (Town & Country Planning Act 1990; Planning & Compulsory Purchase Act 2004) to prepare a development plan for their area. Accordingly, this paragraph should re-worded to the reflect this, as follows: <i>“Neighbourhood Development Plans (NDPs) are a relatively new part of the statutory development planning system. Local planning authorities including CBMDC are required to produce a development plan, such as the Core Strategy and other Development Plan Documents, or Local Plan. These plans promote, guide and control development of housing, businesses, open spaces and other uses of land across their area. By preparing a Neighbourhood Development Plan town councils can also play a part in this process”.</i>			
Full Submission:			
The plan as a whole could benefit from providing links to the relevant Core Strategy policies. This will allow readers to understand how the plan’s policies are linked to the wider strategic planning policy context. Therefore, following each policy a box/table should be included in the document set out the Core Strategy policies relevant to the it			

5. CHAPTER 3 – CITY OF BRADFORD METROPOLITAN DISTRICT STRATEGIC PLANNING POLICY

Consultation point:	3. City of Bradford Metropolitan District Strategic Planning Policy		
Representation ID:	21641	Comment Type:	Comment
Respondent:	2412	Agent:	
Summary:			

On section 3.5 the current planning permission application with Bradford 21/02958/MAF is an opportunity for Bradford planning to meet ~1% of the 1000 homes commitment by allowing the site to be sensitively developed for local homes (rather than AN Other care home).

Full Submission:

On section 3.5 the current planning permission application with Bradford 21/02958/MAF is an opportunity for Bradford planning to meet ~1% of the 1000 homes commitment by allowing the site to be sensitively developed for local homes (rather than AN Other care home).

Consultation point:	3. City of Bradford Metropolitan District Strategic Planning Policy		
Representation ID:	29827	Comment Type:	Comment
Respondent:	4063	Agent:	

Summary:

This proposal is based on the Flawed Core Strategy information being reused as a basis for this Bradford Local Plan, both of which took no notice of the 1500 homes built in the 10 years period of the above plans, the so called windfalls, which have at least added 3000 extra cars into the community. Hence the Failed car parking policy, which has caused a half mile on new parking areas along the roads leading from the centre of Town into the residential areas. The inadequate station parking at both the main and Ben Rhydding stations for travel to Leeds and Bradford for business has exasperated the situation. We are a residential commuter town for those City's not a Market Town as Bradford seem to be forcing on us, market Towns are Skipton and Otley.

It is clear the presented plan is outdated even before the release of the consultation as the Government has funded 850 new homes on Brownfield sites in Bradford, a start, and they have 7,800 homes in Bradford unoccupied for over 24 months. 8,276 affordable homes could be delivered across West Yorkshire and make a big impact in providing homes. Get building and letting those empty homes and reduce the housing figures to be allocated to the outer districts of Bradford, e.g. Ilkley.

It is understood that the Ilkley neighbourhood plan has to link into the previously Flawed Bradford Local plan however I would hope that Ilkley people stand up for all its residents vigorously and not accept the Bradford Metropolitan basis of their interpretation of the needs of our Rural Town.

Full Submission:

Let us not fool ourselves the Ilkley Neighbourhood plan has to be linked and based around the Bradford Local Plan. The comment below are legitimate relate to the Ilkley Neighbourhood plan whether you like to separate the two. The comments enclosed and listed below in the Ilkley Neighbourhood Plan references are valid statements relative to that plan. It is acknowledged that the Parish and then Town Council councillors had need to relate to the Core strategy and then the Bradford plan in coming to their conclusions where clearly the emphases was to the BRADFORD plan not the other way round. Basically as the local councillors know their neighbourhood, their comments should come first and then to be considered in the Bradford Plan, then we can have true representation not the other way around.

Just because I refer to the founding documents of the Bradford plan, which has to be considered, this does not invalidate my comments as you suggest. I have again read through the Ilkley NP and added minor adjustments to my original document, see below.

This proposal was based on the Flawed Core Strategy information being reused as a basis for this Bradford Local Plan, both of which took no notice of the 1,500 homes built in the 10 years period of the above plans, the so called windfalls, which have at least added 3000 extra cars into the community. Hence the Failed car parking policy, which has caused a half mile on new parking areas along the roads leading from the centre of Town into the residential areas. The inadequate station parking at both the main and Ben Rhydding stations for travel to

Leeds and Bradford for business has exasperated the situation. We are a residential commuter town for those City's not a Market Town as Bradford seem to be forcing on us, market Towns are Skipton and Otley.

It is clear the presented plan is outdated even before the release of the consultation as the Government has funded 850 new homes on Brownfield sites in Bradford, a start, and they have 7,800 homes in Bradford unoccupied for over 24 months. 8,276 affordable homes could be delivered across West Yorkshire and make a big impact in providing homes. Get building and letting those empty homes and reduce the housing figures to be allocated to the outer districts of Bradford, e.g. Ilkley.

is understood that the Ilkley neighbourhood plan has to link into the previously Flawed Bradford Local plan however I would hope that Ilkley people stand up for all its residents vigorously and not accept the Bradford Metropolitan basis of their interpretation of the needs of our Rural Town.

Introduction headings to the Ilkley Neighbourhood plan are as follows and responded to.

5.17.1 Ilkley is a former spar town and current Tourism centre and residential town for Leeds and Bradford.

5.17.3 Population - It would be interesting to see the date of when the figures in the document were listed as being a resident for 42 years and seeing the demographic changes, mainly in the retirement and care areas whether the population figures being affected by the younger population. Ilkley has more younger academics and professionals due in the last 10 years of Banking, lawyers and accountants moving from the South and now TV employees for C4. Yet in 5.17.6 you say 70% are active in the economy similar to the West Yorkshire average, that does not mean that the retired are inactive.

5.17.6 states a residential town, employment .retail and leisure but fails to understand these in the past were mainly local Ilkley managed businesses and retail outlets run by residents of the Town, this is not now the case with many now being National companies who bring in operatives from out of Town and hence more cars into town and this with the 1500 homes has caused the car parking problem in Town which has not been resolved. The once proposed car park for the station at Ben Rhydding is now planned as housing!!! Adding to the car parking problem. There is no strategic transport or even co coordinated planning proposal for Ilkley that understands Ilkley.

5.17.7 & 9 Businesses - Refers to increasing businesses but ignore working from home businesses and taken overall the Business residents are a small sector of the Population and should not be taken as the focus of the plan when residents outweigh hugely the business operatives in town. Many visitors to the Town come by rail from Leeds and Bradford and spend little in Town but cause a large amount of the litter, recently increased with the Clean River bathing without any sanitary or refuse collections adjacent to the area or inadequate monitoring, yet another not thought through development.

5.17.11 Market Town - Ilkley has a strong and vibrant centre but we are not a Market Town but a former spar and tourism centre as stated in 5.17.1. The market Towns have always been Skipton and Otley.

5.17.13 Transport - We have a rail station and bus station both with little parking, a bus station and bus stops in the centre of Town which need rationalising as some are only 100M from the bus station. Under the recent traffic management scheme we know have business parking up to half a mile away form the workplaces in to our residential areas.

5.17.17 dwellings - if we have 6,703 existing homes [1500 increase in the last 10 years]no wonder we have a parking problem. We need low cost housing not half million pound 5 bed homes with at least three cars each, on green belt [more high cost means more rates paid!]. We have not the varied industrial and commercial /retail capacity for a Principal Town such as Shipley and Keighley we are a Tourism and Residential town.

5.17.20 More Homes - Bradford Local plan and its predecessors were based on Bradford's need for more homes yet there is Hectares of Brownfield land in Bradford that needs redeveloping not green field sites. There was never, in these plans any coordinated infrastructure provisions such as doctors, schools and retail provisions to support the increased number of houses, across the whole District. We need low cost homes to keep young Ilkley families in Ilkley by mostly building high end homes not starter homes. Site and home prices are high and price out low income families. 105 discount for young families is insufficient to keep the community together

and force the young to move into cheaper areas away from their supporting families still living in Ilkley, this causes unnecessary travel and damage to the environment.

5.17.23 & 27 - Green Belt- Ilkley has the green belt designated to enhance the Visitor centre with the Moor and surrounding lower Wharfedale scenery. There should be no change to the green belt. Retention of the listed buildings and the conservation area and open spaces are what makes Ilkley. Yes we have little brownfield land but Bradford's has a huge amount. In item 30 I presume you mean Eats and Westholme fields.

5.17.31 - Although we have a thriving sports offer in Ilkley they are all mainly in membership clubs and there is no low cost sports facilities available for low income families and casual sports.

5.17.34 – schools - All over committed in numbers no spaces available.

5.17.35 - Surgery - All practices are over committed with numbers.

5.17.37 - long term planning - At last a comment about infrastructure and as seen above, we at the moment have no capacity, so why more high value homes on Green Belt land except for more Rates. Is not 1,500 homes out of 6700 too large an increase over the last 10 years reflecting in the overcrowding of schools surgeries and car parking? We have a situation where we have a contract area for 23 and only 6 spaces filled [especially at the weekends], so that leaves 17 which could be earning revenue and space for visitors. We now have business parkers parking all the way up Grove and Kings Road and around the Station at Ilkley and Ben Rhydding.

Regarding IL1/H - This site is a prime rural setting to a rural town which if used for housing would deteriorate the vista of the Town and the Moor. Development would further exacerbate the Bolling Road Junction and hence the Leeds road /Wheatley Lane traffic junction on the A65 where traffic often backs up to beyond the Manor bends just before Burley in Wharfedale. This is a valuable open space and a golf club site and green belt development again.

Regarding 5.17.37 - Key statement states in the Local Area Strategic plan “continue to protect important areas of open space and ecology and habitat networks”, yet IL1 and IL/3 contradicts this.

Regarding IL2/H - Access and visibility for this site is dangerous being on a bend and on a downward slope and before the traffic lights at Victoria Avenue this will cause further delays on the A65. Number of homes too high and not commensurate with the surrounding area and the trees screen to the north must be maintained. Hebers Ghyll beck runs adjacent the site and is a fast flowing beck from the Moor.[Flood zone 1]. It is only 1 mile from the Centre of town and therefore is in walking distance of facilities. When this site was cleared from undergrowth many invertebrates, rabbits etc. were ejected. Table A says 20 yet this section says 30 !!! this is too high density even at the lower figure.

Regarding IL3/H - Interestingly part of this site was allocated previously for station parking. It is a prime Green Belt site. In the past a portion of the site was to be a car park for the adjacent station and now only adds this in a passing comment. Development would further exacerbate the Bolling Road Junction. It is a prime visual rural entry to a rural Town with good views of the Moor. Flood Zones 1, 2 and 3! Close to a Grade 2 listed Building.

Regarding IL4/H - Stockeld Rd. This is amenity Land for the Church and as the street parking has taken away the access for church funerals and wedding the area is needed by the Church. Flood zone 1 and 2! Required open space for the surrounding conservation area and Old Bridge setting which only provides 9 homes. We need to maintain our Town and community and reject unsound development to build more homes on Brownfield sites in Bradford.

Consultation point:	3. City of Bradford Metropolitan District Strategic Planning Policy (Para 3.1)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			

It is considered that this section of the document should highlight the chain of conformity between national, local and neighbourhood plan policy. This will show that the neighbourhood plan is not being preparing in isolation.

Full Submission:

It is considered that this section of the document should highlight the chain of conformity between national, local and neighbourhood plan policy. This will show that the neighbourhood plan is not being preparing in isolation.

It is suggested that the following wording is included as a new paragraph (prior to current para 3.1):

“The Plan has been produced by Ilkley Town Council in accordance with the legislative provisions highlighted in paragraph 1.2 together the policy and guidance set out in the National Planning Policy Framework, (NPPF) and on-line Planning Practice Guidance (PPG), covering a range of subjects issued by the Ministry for Housing, Communities and Local Government (MHCLG) since 2012 and 2014 respectively. The NPPF has been revised on a number of occasions (2018 & 2019) since first issued in 2012, the latest of which was issued in July 2021. The on-line PPG has been updated, where changes in policy have occurred”.

If included, paragraph numbering should be updated as required.

Consultation point:	3. City of Bradford Metropolitan District Strategic Planning Policy (Para 3.3)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
As mentioned above, it would be useful there were links to/summary of to the relevant Core Strategy policies in this paragraph, including Policies SC4, WD1 and HO3.			
Full Submission:			
As mentioned above, it would be useful there were links to/summary of to the relevant Core Strategy policies in this paragraph. These are:			
<ul style="list-style-type: none"> • Policy SC4: Settlement Hierarchy – identifies Ilkley as a Principal Town and as such a main focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities. • Sub Area Policy WD1: Wharfedale – identifies the strategic pattern and distribution of development as well as economic development, environmental and transport priorities for the Wharfedale sub-area. In respect of Ilkley, it highlights a housing requirement of 1,000 dwellings up to 2030 focussed on urban redevelopment opportunities and a significant contribution from Green Belt in sustainable locations. • Policy HO3: Distribution of Housing Development – sets out a housing requirement of 1,000 dwellings for Ilkley up to 2030. 			

Consultation point:	3. City of Bradford Metropolitan District Strategic Planning Policy (Para 3.4)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Reference should be made to adopted Area Action Plans and made neighbourhood plans to provide complete overview of the strategic planning context.			

Full Submission:	
<p>The adopted Area Action Plans (AAP) for Bradford City Centre and Shipley & Canal Road Corridor (both adopted December 2017) as well as the made neighbourhood plans (Addingham [January 2020]; Burley in Wharfedale [May 2018]; Haworth, Cross Roads & Stanbury [June 2021]; and Steeton with Eastburn & Silsden [June 2021]) also form part of the development plan for Bradford District and should be referenced within this section of the plan to provide a complete overview of the strategic planning context for the neighbourhood plan, alongside the Core Strategy DPD and Waste Management DPD.</p>	

Consultation point:	3. City of Bradford Metropolitan District Strategic Planning Policy (Para 3.5)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	

Summary:

This paragraph should be revised to reflect the fact that CBMDC is now preparing a single Local Plan for the District rather than a partial review of the adopted Core Strategy and separate Allocations DPD

Full Submission:	
<p>This paragraph should be revised to reflect the fact that CBMDC is now preparing a single Local Plan for the District rather than a partial review of the adopted Core Strategy and separate Allocations DPD. The following wording should be considered:</p> <p><i>“The INDP must be in general conformity with the adopted Core Strategy, hence the reference to 1,000 new houses. CBMDC are currently preparing a single Bradford District Local Plan covering the period 2020 to 2038. Work commenced on a Core Strategy Partial Review (CSPR), which reached its Preferred Options stage in July 2019 and was taken into account when preparing this neighbourhood plan, where necessary, and was intending to produce a separate Allocations DPD. Since that point, it was decided to prepare a single Local Plan covering all policy topics and site allocations.</i></p> <p><i>A Preferred Options version of the new Local Plan was published for community and stakeholder consultation in February and March 2021. This included policies setting out the distribution of development, site allocations and potential changes to the Green Belt as well as a Local Area Strategy for Ilkley. As part of the emerging Local Plan, Ilkley is still classed as Principal Town, however the proposed housing requirement is reduced from 1,000 dwellings (up to 2030) to 500 dwellings (up to 2038). The emerging Local Plan is still in its early stages and is not yet adopted policy. Work will continue on its preparing over the coming years.”</i></p> <p>Other references elsewhere in the neighbourhood plan document to the Core Strategy Partial Review and Allocations DPD should also be updated to make reference to the emerging Local Plan.</p>	

Consultation point:	3. City of Bradford Metropolitan District Strategic Planning Policy (Figs. 3 & 4)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	

Summary:

It should be noted that Figures 3 & 4 may potentially include policy details have been superseded or are outdated.

Full Submission:

It should be noted that Figures 3 & 4 may potentially include policy details have been superseded or are outdated.

A note should be included within the neighbourhood plan document highlight this and directing readers to lists of those policies which have been superseded by the adoption of the Core Strategy, Area Actions Plans and Waste Management DPD. The links are provided below:

- [Core Strategy – Schedule of saved and deleted RUDP Policies](#)
- [Waste DPD – Saved Policies Schedule](#)

6. CHAPTER 4 – VISION AND OBJECTIVES FOR THE INDP

Consultation point:	4. Vision and objectives for the INDP		
Representation ID:	29872	Comment Type:	Comment
Respondent:	Redrow Homes [7009]	Agent:	Johnson Mowat [7040]
Summary:			
<p>Redrow welcome the Ilkley 2030 Vision which seeks a vibrant, viable, sustainable and successful town by 2030. Objective 1 “Sustainable Residential Development” is supported as a crucial objective in achieving the Vision to help secure sustainable development. It is considered that land off Wheatley Lane, to the rear of existing development on Wheatley Lane will provide the opportunity of assisting in meeting the Vision and Objective 1. The site is located in a sustainable location, on the edge of Ben Rhydding. It is close to existing services and facilities, with excellent public transport links (bus services and Ben Rhydding Train Station). The development of this site provides an opportunity for creating a scheme to form an important gateway development when entering into Ilkley from the east, and its allocation via the Local Plan will contribute to a robust housing supply in Ilkley, reducing pressure on other sites from speculative development</p>			
Full Submission:			
<p>We write on behalf of Redrow in relation to their land interests on land off Wheatley Lane, Ilkley (SHLAA Site Ref IL/013). Johnson Mowat have made a number of representations and submissions to the Council via the Local Plan process in relation to the suitability of this site, including the submission of a Promotional Brochure in July 2016 in response to the Site Allocations DPD Issues and Options consultation, and more recently the completion of a Site Deliverability Request Form in July 2020. The site is not identified in the March 2021 Draft Bradford District Draft Local Plan and submissions were made regarding the suitability of the site and the strong case for the inclusion of the site in the Bradford Local Plan.</p> <p>We welcome the opportunity to respond to the Submission Draft of the Ilkley Neighbourhood Plan and trust that our below comments will be taken into consideration. We request that we continue to be kept informed of the future stages of the Neighbourhood Plan, including the Examination stages, and request that Johnson Mowat continue to be notified.</p> <p>We set out below our comments to individual policies contained in the Submission Draft.</p> <p>Vision and Objectives</p> <p>Redrow welcome the Ilkley 2030 Vision which seeks a vibrant, viable, sustainable and successful town by 2030. Objective 1 “Sustainable Residential Development” is supported as a crucial objective in achieving the Vision to help secure sustainable development. It is considered that land off Wheatley Lane, to the rear of existing development on Wheatley Lane will provide the opportunity of assisting in meeting the Vision and Objective 1. The site is located in a sustainable location, on the edge of Ben Rhydding. It is close to existing services and facilities, with excellent public transport links (bus services and Ben Rhydding Train Station). The development</p>			

of this site provides an opportunity for creating a scheme to form an important gateway development when entering into Ilkley from the east, and its allocation via the Local Plan will contribute to a robust housing supply in Ilkley, reducing pressure on other sites from speculative development.

Policy INDP1 - New housing Development within Ilkley

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

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

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

Policy INDP3 - Protecting and Enhancing Recreation Facilities

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

Policy INDP5 - Encouraging High Quality and Zero Carbon Design

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

Policy INDP13 - Protecting and Enhancing Biodiversity

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

Consultation point:	4. Vision and Objectives for the INDP (Objective 3)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
It is queried where the energy efficiency and low carbon energy part of this objective fits under the heading of ‘ <i>Cultural Landscape</i> ’.			
Full Submission:			
It is queried where the energy efficiency and low carbon energy part of this objective fits under the heading of ‘ <i>Cultural Landscape</i> ’.			

Consultation point:	4. Vision and Objectives for the INDP (Objective 5)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The plan should make more explicit what is meant by ‘ <i>multi-modal transport assets</i> ’ as this could be misunderstood. For example, does this mean public transport services as well as cycling and walking. This comment is also relevant in respect of Policies INDP14 and paragraph 5.63.			
Full Submission:			
The plan should make more explicit what is meant by ‘ <i>multi-modal transport assets</i> ’ as this could be misunderstood. For example, does this mean public transport services as well as cycling and walking. This comment is also relevant in respect of Policies INDP14 and paragraph 5.63.			

Consultation point:	4. Vision and Objectives for the INDP (Objectives 5 & 6)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The thrust of these objectives in reducing private car use and promoting cycling and walking is supported.			
Full Submission:			
The thrust of these objectives in reducing private car use and promoting cycling and walking is supported.			

7. CHAPTER 5 – INDP POLICIES AND PROPOSALS - INTRODUCTION

Consultation point:	4. Vision and Objectives for the INDP (Para 5.1)		
Representation ID:	-	Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The first sentence makes reference the current document being the Regulation 14 Draft version of the plan, however this should read “ <i>the Regulation 16 Draft INDP</i> ”.			
This will be need to be amended in the post-examination and post-referendum to reflect the relevant plan stage. It is suggested that this sentence is amended to read “ <i>This chapter of the INDP sets out the planning policies and proposals that will be used to help us achieve our 2030 Vision and objectives.</i> ”			
Full Submission:			
The first sentence makes reference the current document being the Regulation 14 Draft version of the plan, however this should read “ <i>the Regulation 16 Draft INDP</i> ”.			

This will be need to be amended in the post-examination and post-referendum to reflect the relevant plan stage. It is suggested that this sentence is amended to read *“This chapter of the INDP sets out the planning policies and proposals that will be used to help us achieve our 2030 Vision and objectives.”*

8. CHAPTER 5 – INDP POLICES AND PROPOSALS – POLICY INDP1

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:	21748	Comment Type:	Comment
Respondent:	6290	Agent:	
Summary:			
I strongly support the principles proposed with the caveat that talk of 'high quality' housing should not exclude considerations of affordability. Ilkley needs affordable housing! - moreover, it is those likely to buy affordable housing who are most likely to work locally and therefore help with the INDPs concerns about climate change.			
Full Submission:			
I strongly support the principles proposed with the caveat that talk of 'high quality' housing should not exclude considerations of affordability. Ilkley needs affordable housing! - moreover, it is those likely to buy affordable housing who are most likely to work locally and therefore help with the INDPs concerns about climate change.			

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:	29833	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			
<p>There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. 			

Full Submission:

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated site - improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and

habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:	29861	Comment Type:	Support
Respondent:	6068	Agent:	
Summary:			
I support the plan that has been proposed in particular the policy to reuse previously developed land in favour of greenfield or greenbelt land where applicable and within the conditions mentioned with the consultation plan document. I also consider that green belt land should be protected for all the reasons stated and more.			
Full Submission:			
Please be aware that Housing Site Allocation INDP2/2 has boundaries adjacent with two primary schools. I am not in support of this allocated site given its location and its use by the community for sporting events, etc. For INDP2/2, given its location, any potential future developments must take into account mitigating or avoiding any unacceptable risks (eg noise and dust levels) during its development, especially given the vulnerable adjacent site users, that is, the children. I support the plan that has been proposed in particular the policy to reuse previously developed land in favour of greenfield or greenbelt land where applicable and within the conditions mentioned with the consultation plan document. I also consider that green belt land should be protected for all the reasons stated and more.			

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:	29873	Comment Type:	Comment
Respondent:	Redrow Homes [7009]	Agent:	Johnson Mowat [7040]
Summary:			
It is welcomed that the Ilkley Neighbourhood Plan acknowledges that it is for the Bradford Local Plan to establish the revision of Green Belt boundaries and not a matter for the neighbourhood plan process. In this regard the Neighbourhood Plan Policies Map does not identify Green Belt, or individual housing sites therefore			

allowing for the Local Plan process to establish Green Belt revisions and allocated housing sites. This is a sensible approach as it allows for the Neighbourhood Plan to align with the future Local Plan.

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

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

Full Submission:

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

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

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

Vision and Objectives

Redrow welcome the Ilkley 2030 Vision which seeks a vibrant, viable, sustainable and successful town by 2030. Objective 1 "Sustainable Residential Development" is supported as a crucial objective in achieving the Vision to help secure sustainable development. It is considered that land off Wheatley Lane, to the rear of existing development on Wheatley Lane will provide the opportunity of assisting in meeting the Vision and Objective 1. The site is located in a sustainable location, on the edge of Ben Rhydding. It is close to existing services and facilities, with excellent public transport links (bus services and Ben Rhydding Train Station). The development of this site provides an opportunity for creating a scheme to form an important gateway development when entering into Ilkley from the east, and its allocation via the Local Plan will contribute to a robust housing supply in Ilkley, reducing pressure on other sites from speculative development.

Policy INDP1 - New housing Development within Ilkley

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

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

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

Policy INDP3 - Protecting and Enhancing Recreation Facilities

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

Policy INDP5 - Encouraging High Quality and Zero Carbon Design

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

Policy INDP13 - Protecting and Enhancing Biodiversity

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

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:	29989	Comment Type:	Comment
Respondent:	Historic England [101]	Agent:	
Summary:			
Policy item d) does not refer to heritage assets whether designated or non-designated. See Glossary item regarding Heritage Assets below. Recommendation - Re-word policy as follows: “ <i>Would not have a significant adverse impact on a listed building and/or Conservation Area or other heritage asset or the setting of such an asset.</i> ”			
Full Submission:			
Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan. We are responding to the request in your e-mail of 14th September 2021. We have highlighted the fact that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012. We are therefore providing comments on the understanding that the Submission Draft may need to be amended, and if this is the case, a further consultation may be required.			

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:	29990	Comment Type:	Comment
Respondent:	Historic England	Agent:	
Summary:			
Policy item d) refers to Listed Buildings, but the document does not define a Listed Building, or identify them in a schedule or on a map, or via a hyper link. Recommendation - <ul style="list-style-type: none"> • Include a definition of a Listed Building within the Glossary. 			

- Incorporate a map and schedule of Listed Buildings within the Neighbourhood Plan area, and/or include a hyper link to Historic England s Listing web page, highlighting Listed Buildings in Ilkley.

Full Submission:

Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan. We are responding to the request in your e-mail of 14th September 2021.

We have highlighted the fact that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012. We are therefore providing comments on the understanding that the Submission Draft may need to be amended, and if this is the case, a further consultation may be required.

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Presentation of the policy is confusing. It is suggested that shading and number of is revisited. Addition of headings within each part of the policy would provide clarity and improve its readability. Suggested that wording of the first paragraph could be simplified.			
Full Submission:			
As presented the coloured boxes and number of the policy points would appear confusing. It is suggested that shading should be one colour and that the number is revisited.			
The addition of headings for each part of the policy would provide clarity and improve its readability. These heading should be as follows:			
<ul style="list-style-type: none"> • New Housing Development (covering the first paragraph and points a to f) • Housing Density (covering the second & third paragraphs and points i to iii) • Housing Mix (covering the fourth paragraph and covering points g to i. 			
It is suggested that the policy wording within the first paragraph could be simplified for ease of reading/interpretation and state “Within the settlement boundary of Ilkley, new development for housing....”.			

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Point e) should reference Homes and Neighbourhoods Design Guide Supplementary Planning Document in addition to the Core Strategy and Ilkley Design Guide. It is noted that it is highlight in paragraph 5.5.			
Full Submission:			
Point e) should reference Homes and Neighbourhoods Design Guide Supplementary Planning Document in addition to the Core Strategy and Ilkley Design Guide. It is noted that it is highlight in paragraph 5.5.			

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
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Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Point e) - It is queried whether the word “and” should be included at the end of this point. As drafted it the policy could be viewed as being inflexible.			
Full Submission:			
Point e) - It is queried whether the word “and” should be included at the end of this point. As drafted it the policy could be viewed as being inflexible.			

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>Part f) – this element of the policy references Core Strategy Policy SC8 in relation to protecting the South Pennine Moors SPA and SAC. This is welcomed and reflects the Core Strategy policy SC8, however, this would be strengthened and better align with SC8 by also referencing the approach to mitigation as recommended in the Habitats Regulations Assessment (HRA) undertaken by AECOM as part of the Neighbourhood Plan preparation.</p> <p>We would support the inclusion of this additional text into policy INDP1, with perhaps a more direct reference to the recent Supplementary Planning Document which outlines Bradford’s approach to mitigating additional recreation pressure on the South Pennine Moors SPA/SAC. This would have the further effect of complying with the Habitats Regulations</p>			
Full Submission:			
<p>Part f) - this element of the policy references Bradford Local Plan Core Strategy Policy SC8 in relation to the protecting the South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC). This is welcomed and reflects the Core Strategy policy SC8, however, this would be strengthened and better align with SC8 by also referencing the approach to mitigation as recommended in the Habitats Regulations Assessment (HRA) undertaken by AECOM as part of the Neighbourhood Plan preparation.</p> <p>In Chapter 6 of the HRA, additional text is recommended which expands on these points as follows:</p> <p><i>“Proposals for new development that impact on habitats and wildlife referred to in Bradford Core Strategy Strategic Core Policy SC8 Protecting the South Pennine Moors and their zone of influence and Policy EN2 Biodiversity and Geology (relating to the North and South Pennine Moors SPAs and SACs, and Sites of Special Scientific Interest) should demonstrate how biodiversity will be protected and enhanced.</i></p> <p><i>New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse fragmentation. Development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the South Pennine Moors (Phase II) Special Protection Area (SPA) and/or South Pennine Moors Special Areas of Conservation (SAC). To mitigate impacts on European Sites due to the increase in population and therefore an increase in recreational pressure on the European sites, an approach will be adopted that sets out a mechanism for the calculation of the planning contribution. In line with the Bradford Core Strategy all development within 7km of the SAC/SPA is to provide or contribute to additional natural greenspace for recreation, implementation of access and habitat management measures within the SAC/SPA to reduce the impacts of recreational pressure”.</i></p>			

We would support the inclusion of this additional text into policy INDP1, with perhaps a more direct reference to the recent Supplementary Planning Document which outlines Bradford’s approach to mitigating additional recreation pressure on the South Pennine Moors SPA/SAC. This is the “approach” referred to in the above text. This would have the further effect of complying with the Habitats Regulations, as AECOM put it:
“Provided that this wording is incorporated within the Ilkley Neighbourhood Development Plan Preferred Options it can be considered that recreational pressure from the Plan will not result in adverse effects upon the integrity of the South Pennine Moors SAC or South Pennine Moors (Phase II) SPA alone or in combination with other plans and projects.”

Consultation point:	Policy INDP1: New Housing Development within Ilkley		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>Point g) as currently drafted is unclear as to its meaning and required further clarification, particularly in relation to “starter homes”. It is queried whether this should also refer to First Homes, as starter homes are a particular affordable housing product defined within the National Planning Policy Framework.</p> <p>It may be more appropriate for the policy to refer to homes suitable for first time buyers or discounted for market sale.</p> <p>The terminology “<i> dwellings that would create downsizing opportunities </i>” needs to be clearly defined in order assist with its interpretation. Does it mean downsizing by 1 or 2 bedrooms, for example from a 5/6-bedroom home to a 3/4 bedroom one. Alternatively, does not mean the provision of smaller sized dwellings? In addition, it should be clear what evidence underpins this element of the policy.</p>			
Full Submission:			
<p>Point g) as currently drafted is unclear as to its meaning and required further clarification, particularly in relation to “starter homes”. It is queried whether this should also refer to First Homes, as starter homes are a particular affordable housing product defined within the National Planning Policy Framework.</p> <p>It may be more appropriate for the policy to refer to homes suitable for first time buyers or discounted for market sale.</p> <p>The terminology “<i> dwellings that would create downsizing opportunities </i>” needs to be clearly defined in order assist with its interpretation. Does it mean downsizing by 1 or 2 bedrooms, for example from a 5/6-bedroom home to a 3/4 bedroom one. Alternatively, does not mean the provision of smaller sized dwellings? In addition, it should be clear what evidence underpins this element of the policy.</p>			

Consultation point:	Policy INDP1: New Housing Development within Ilkley (Para 5.2)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>The wording of this paragraph refers to responses made to the Core Strategy DPD during its preparation. As this has now been adopted and forms part of the development plan for Ilkley it is considered that this paragraph should be reworded to centre on the issues raised during the evidence gathering and early consultation stages of the neighbourhood plan. Woring is suggested to in order to better relate to the policy and ensure that the strategic policies of the Local Plan are not undermined.</p>			

Full Submission:
<p>The wording of this paragraph refers to responses made to the Core Strategy DPD during its preparation. As this has now been adopted and forms part of the development plan for Ilkley it is considered that this paragraph should be reworded to centre on the issues raised during the evidence gathering and early consultation stages of the neighbourhood plan.</p> <p>The following is suggested in order better relate to the policy and ensure that the strategic policies of the Local Plan are not undermined:</p> <p><i>“The biggest issue raised for the future development of Ilkley in the Questionnaire Survey, was the impact of the proposed level of housing growth on the Ilkley, particularly in relation to its setting, the Green Belt, landscape and protected wildlife area. The protection of such important features have to be balanced with the benefits new housing can bring in terms of meeting local needs, particularly affordable housing, and in supporting local services and facilities”.</i></p>

Consultation point:	Policy INDP1: New Housing Development within Ilkley (Paras 5.2 to 5.7)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Paragraphs refer to the Core Strategy Partial Review and Allocations DPD. This should be updated to reflect the fact that CBMDC are now preparing a single Local Plan for the District covering the period 2020 to 2038.			
Full Submission:			
It is noted that the Core Strategy Partial Review and Allocations DPD is referred to in paragraphs 5.3, 5.4, 5.6 & 5.7. This should be updated to reflect the fact that CBMDC are now preparing a single Local Plan for the District covering the period 2020 to 2038, which will set the overall of level of growth and it distribution across the area. As mentioned earlier, it proposes a lower of level of housing growth in Ilkley – 500 dwellings rather 1,000 dwellings – albeit over different plan periods. It is still an emerging plan, at its early stages of production and is not adopted planning policy.			

Consultation point:	Policy INDP1: New Housing Development within Ilkley (Paras 5.4 & 5.6)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
In terms of the need to release Green Belt, Core Strategy policy SC7 establishes that Green Belt releases are required in order to fully deliver the longer term housing and jobs growth in the District as set out in policies HO3, EC3 and WD1. It states that this will be delivered by a selective review of the Green Belt in locations where its strategic function is not undermined and accord with policies SC4 & SC5. The review was to be undertaken via the Allocations DPD, however this will now fall within the emerging Bradford District Local Plan (2020 to 2038).			
Full Submission:			
In terms of the need to release Green Belt, Core Strategy policy SC7 establishes that Green Belt releases are required in order to fully deliver the longer term housing and jobs growth in the District as set out in policies HO3, EC3 and WD1. It states that this will be delivered by a selective review of the Green Belt in locations where its strategic function is not undermined and accord with policies SC4 & SC5. The review was to be undertaken			

via the Allocations DPD, however this will now fall within the emerging Bradford District Local Plan (2020 to 2038).

Core Strategy policy HO2 sets out details of how the overall housing requirement established in Policy HO1 will be met from various different sources. This includes local Green Belt releases where consistent with the Plan’s sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub-area.

Whilst the aim of making the most effective/efficient use of land within the settlement boundary is welcomed, the policy context states that Green Belt release will be required to meet Ilkley’s housing requirement.

Those settlements where local Green Belt releases are proposed are shown on the Core Strategy Key Diagram. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine them.

Consultation point:	Policy INDP1: New Housing Development within Ilkley (Para 5.7)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Typo – delete ‘the’ between ‘of’ and ‘Ilkley’			
Full Submission:			
Typo – delete ‘the’ between ‘of’ and ‘Ilkley’			

Consultation point:	Policy INDP1: New Housing Development within Ilkley (Para 5.8)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
CBMDC are preparing a Supplementary Planning Document (SPD) to provide further details and guidance on how Core Strategy Policy SC8 should be applied. It is suggested that the emerging SPD should be referenced in this paragraph.			
Full Submission:			
It should be noted that CBMDC are preparing a Supplementary Planning Document (SPD) to provide further details and guidance on how Core Strategy Policy SC8 should be applied. A draft version was the subject of community and stakeholder during February and March 2021, and is expect to be brought into effect in the near future. Accordingly, it is suggested that the emerging SPD should be referenced in this paragraph.			

9. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP2

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	29882	Comment Type:	Object
Respondent:	Craiglands Ltd [7044]	Agent:	Lichfields [7042]
Summary:			

In its current form our Client strongly objects to draft policy INDP2 of the emerging Neighbourhood Plan. The definition of community facilities within the draft policy (and in particular its identification of Craiglands Hotel) is both internally inconsistent and contrary to the NPPF which excludes hotels as such facilities. It has also been demonstrated that Craiglands Hotel does not operate as a “community facility”. The draft policy therefore fails to comply with the basic conditions of a Neighbourhood Plan as required by the Regulations (specifically Basic Conditions A and D). As a minimum therefore, Craiglands Hotel should be removed from the list of community facilities as set out within the policy. It is also a cumbersome policy that has not been formulated based upon a robust or well considered evidence base. It only protects facilities listed within the policy as they exist today and would not afford any protection to future such facilities. Its application would not contribute towards the promotion of sustainable development in Ilkley. A revised and more simplified wording for the draft policy is proposed that would apply protection to all facilities (that both exist now and may exist in the future) that meet a correct definition of a “community facility” as defined by the NPPF. This would make for a more robust and practical policy and one that would satisfy the basic conditions.

Full Submission:

We act on behalf of Craiglands Ltd (“our Client”), who are part of Edgeman Ltd, the owners of several hotels throughout the north of England.

Our Client welcomes the opportunity to be able to comment on the Regulation 16 draft of the Ilkley Neighbourhood Development Plan 2020-2030 (“draft Neighbourhood Plan”). Indeed our Client is fully supportive of Ilkley Town Council’s desire to deliver a Neighbourhood Plan, which alongside the wider suite of documents that make up the Bradford Local Plan will steer development in Ilkley over the long term, in accordance with its visions and objectives. However, our Client objects to the terms of a specific policy (INDP2) within the draft Neighbourhood Plan, which for the reasons contained within these representations, does not meet the requisite “basic conditions”.

By way of background, our Client is a long-term and committed operator and custodian of Craiglands Hotel, having taken ownership in 1999 and since that time has invested considerably in the building and its ongoing operation as a hotel. In addition to its general up keep and repair, this has included the creation of a new gym/spa facility, investment in the banqueting suites and modernisation of the rooms. Part of this has been made viable through enabling development in the wider grounds.

In its present form, the hotel operates under the Best Western Plus brand, offering 63 bedrooms, together with a bar and restaurant, a gym and spa, and wider banqueting facilities. Further information on how the hotel operates is contained in a letter dated 14th September 2021 prepared by our Client, which is appended to these representations and is referenced throughout.

Comments on Policy INDP2

Our comments on the draft Neighbourhood Plan relate to draft Policy INDP2 “Protecting and Enhancing Community Facilities”. The policy lists a wide range of services, businesses and local facilities in and around Ilkley. Importantly, this is a list formulated as of the time that the draft Neighbourhood Plan was published for consultation. The lists amounts to a total of 52 facilities, including Craiglands Hotel (ref. INDP2/39).

Whilst our Client does not object to the principle of a policy that seeks to protect community facilities, they strongly object to the current form and specific wording of the policy on a range of separate, but inter-related grounds.

Overall, the draft Policy in its current form does not comply with the 'basic conditions' required of a Neighbourhood Plan as set out in Paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990. This is explained in detail below.

Consistency with the NPPF and Policy INDP2 itself

Firstly, and most importantly, the identification of Craiglands Hotel as a community facility is inconsistent with the definition of such facilities in the National Planning Policy Framework (NPPF). In this regard the policy fails

to comply with Basic Condition A of the Regulations. It is also inconsistent with how Policy INDP2 of the draft neighbourhood plan itself identifies such facilities.

At national level there are several references to community facilities within the NPPF¹. None of those include reference to a hotel being such a facility. At paragraph 20 an overarching definition is provided, where categories of community facilities are identified as health, education and cultural infrastructure. At paragraph 84 of the NPPF, which relates to supporting a prosperous rural economy, a more prescriptive definition of community facilities (albeit also including local services) is set out, where it states:

“Planning policies and decisions should enable:

- d) *the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”* (our emphasis)

Paragraph 93 which relates to promoting healthy and safe communities and the provision and use of shared spaces, community facilities and other local services, incorporates the exact same definition of community facilities and local services as that set out in paragraph 84 and repeated above².

Nowhere within the NPPF are hotels defined as a community facility, or indeed a local service. On the contrary, hotels are excluded from the consistent definition of such facilities throughout NPPF as referenced above.

Therefore to seek to define a private hotel of the nature of Craiglands is wholly contrary to the NPPF. Not only are hotels excluded from the definition of community facilities in the NPPF, but it is also noted that in its current form INDP2 also excludes hotels within its own definition of the type of community facilities that are deemed appropriate as part of any redevelopment for the wider policy not to apply³. In this regard, it is somewhat perverse (certainly disproportionate) to seek to include a commercial facility such as Craiglands Hotel within the policy list, when out with the implicit definition of such facilities in the policy itself.

Accordingly the approach of INDP2 in seeking to protect Craiglands Hotel as a community facility is both internally inconsistent (i.e. the Craiglands Hotel does not fall within any of the categories to which the draft policy refers) and wholly contrary to the NPPF. It therefore fails to comply with Basic Condition A of the Regulations.

In addition to the above, the separate Regulations relating to “Assets of Community Value”⁴ is also of relevance. Such “assets” are defined⁵ as buildings or land which furthers the social well-being or social interests of an area. Importantly those Regulations states that hotels, being residences, are excluded from such a definition. Whilst a separate regime, such an approach is consistent with the NPPF definition of community facilities in not including hotels.

Definition of Craiglands Hotel as a Community Facility

The second part of our Client’s objection to Policy INDP2 is that, in addition to the policy definition conflict, Craiglands Hotel cannot be reasonably deemed to function as a “community facility” of the nature that the policy is seeking to, or ought to protect. As the accompanying letter from our Client clearly demonstrates, the hotel operates as a commercial entity and in way that serves a very limited (and increasingly limited) local function. In particular, we are informed as follows:

¹ See paragraphs 20, 28, 84, 93 and 187 of the NPPF (2021)

² Whilst it is acknowledged that the NPPF definition is not a ‘closed list’, it is clear that the typology and characteristics of that list (i.e. their purpose) is as facility that plays an important role to the local community and they perform that function, rather than private commercial enterprise.

³ These are defined in INDP2 as “*health, education, or community type uses (such as community halls, local clubhouses, health centres, schools, public houses and children’s day nurseries)*”.

⁴ Assets of Community Values (England) Regulations 2012

⁵ As defined in the Localism Act 2011

The bar and restaurant, whilst open to the general public derive negligible trade (estimated to be no more than 1% of their custom) from walk-in customers (i.e. those not staying at the hotel). In this regard it is in no way serving the function as a community facility that needs to be protected as such. There is no material use of the bar and restaurant by the community. It is therefore quite different in its operation to the other “hotels” listed within INDP2 (i.e. Cow and Calf Hotel, Wheatley Hotel, Dalesway Hotel, Crescent Inn, Midland Hotel and Station Hotel) all of which function as public houses as their primary (or very significant) purpose, with associated bedrooms. It is appreciated that public houses can perform an important social function as part of a community and as highlighted above are referenced in the NPPF as such a community facility. However, Craiglands is a privately operated commercial hotel, distinct in its functions from these other businesses, which operate as public houses. The Craiglands is therefore not a “community facility” in that regard.

A large majority of the patronage of the hotel rooms is taken up by coach parties using the hotel as a stopover base (42.35% of room lettings in 2019), the market for which is more sensitive to price, rather than location. This is not serving a local need (other than local employment, like any other business) or serving as a facility to the local community. Furthermore, just 3.5% of rooms let in 2019 were contracted to corporate businesses requiring to be in the local area (which in any event is not a community function). Again this demonstrates the absence of the local function it serves. The remainder of the hotel lettings is more akin to bed & breakfast style operations, the uptake of which is not by the community, but visitors to the area.

Whilst the owners have recently invested heavily in a new spa and gym facility, it serves a very limited local function. As the accompanying letter confirms, the locally based contribution (i.e. people from the immediate local area to which the draft NP relates) to the spa is less than 5% of total spa treatments, with the majority of customers coming from a much wider area as part of discounted spa breaks. The gym presently has just 33 memberships, with the remainder of its use being by residents of the hotel or the spa. This further highlights that it is not an important or regularly used facility to the local community. In any event it is noted that other standalone gyms in Ilkley are not identified by the policy as representing community facilities.

Whilst the hotel offers a range of banqueting facilities and the owners have invested in their modernisation, it hosted just 5 locally based events in 2019 amounting to less than 3% of total hotel revenue. This has fallen from in the order of 75 such events in 1999 and the trend is largely attributable to the increasing competition in this time (i.e. Chevin Hotel, Hollins Hall and The Coniston Hotel). The number of weddings the hotel hosts has also fallen in recent times due to the increased range of competition in the local and wider area. Indeed in 2019, of the weddings hosted by the hotel just two were of residents of Ilkley, with the balance coming from people living within the wider Leeds and Bradford conurbation, where clearly Craiglands competes with a multitude of different venues. Whilst the Covid-19 pandemic has restricted the ability to host events in the last 18 months, the information provided by our Client confirms that there are presently just 7 weddings booked in for 2022 and none of these are bookings from people residing in Ilkley (or indeed a 5-mile radius of the hotel).

Reflecting the above, it is clear that the role which Craiglands Hotel plays in serving a local function is both extremely limited/negligible and diminishing. It is very different to many of the other community facilities listed in draft Policy INDP2, insofar as it is a commercial operation that does not serve the local community as its main function. Its local use is both extremely limited and a minor, ancillary part of its operation. Put simply, it is not being used by the local community as such a facility, or operating in such a way. In this regard as a commercial operation serving a wider function, it is quite distinct from the other facilities listed by the policy. Whilst the hotel employs local people, this on its own should also not qualify it as a community facility to be protected in this way; as this applies to varying degrees to any business operation in the local area.

Approach to identifying and listing community facilities

Our Client’s final ground for objection relates to the actual operation of the policy itself and its practical application. By seeking to incorporate a list of all existing community facilities, the draft policy only provides a snapshot in time (at the point at which the plan is prepared) and as presently drafted the policy would not apply any protection to a new community facility that may open in future years. Effectively it seeks to preserve Ilkley in 'aspic' and pays no regard to the fact that towns are dynamic and change over time. Ultimately, over the long

term the policy would fail to do what it seeks to and indeed facilities which are listed may be undermined by the fact that new facilities, not on the list, will not be subject to such constraints. It would potentially lead to an inconsistent approach being applied to the protection of community facilities. As such, it would not be compliant with the Planning Practice Guidance (PPG) which states that *“a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications”*⁶.

The PPG also requires *“Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order”*⁷. In this regard we are not aware of any analysis that underpins the Neighbourhood Plan which seeks to justify the inclusion of the facilities listed. (for example any consideration of those facilities, and the extent to which they may perform an important or unique local role to the local community).

In the absence of such analysis and reflecting the comments above about its practical application, the policy should be redrafted in a way that it becomes a simpler, but importantly more effective policy that provides a clear and specific definition of the 'type' of community facility (consistent with the NPPF) that the protection afforded by parts a) and b) of the policy would apply to. In doing so it would therefore also protect community facilities in the future that presently do not exist.

A suitable form of wording (leaving the latter part of the policy largely unchanged) would be as follows: *“There will be a presumption in favour of the protection of existing community facilities.*

Where planning permission is required, the change of use of community facilities (defined as places of worship, community halls, local clubhouses, health centres, schools, public houses and children’s day nurseries) will only be supported for other health, education or community type uses. When a non-community use (e.g. housing) is proposed to replace, either by conversion or re-development, one of the facilities listed below such development will only be supported when one of the following can be demonstrated:

- a) The proposal includes alternative provision, on a site within the locality, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate car parking.; or*
- b) Where facilities are considered to be no longer needed or suitable for continued community facility use, satisfactory evidence is put forward by the applicant that, over a minimum period of 12 months, it has been demonstrated, through active marketing of the site, that its continued use is no longer viable, or there is no longer a need or demand for the facility.” (Underlined text depicts additional wording)*

In respect of part b) above the additional reference to uses no longer being viable (as demonstrated through marketing) will provide for a more thorough assessment of the suitability of a facility to remain in continued use.

Such a revision would address our Client’s objections. It would provide a clear definition consistent with the NPPF (satisfying Basic Condition A) also allow for a more consistent approach to be applied by the Policy in to contributing towards the achievement of sustainable development. (Basic Condition D of the Regulations). The overall purpose of the policy in protecting community facilities would be strengthened.

Summary / Conclusion

In its current form our Client strongly objects to draft policy INDP2 of the emerging Neighbourhood Plan. The definition of community facilities within the draft policy (and in particular its identification of Craiglands Hotel) is both internally inconsistent and contrary to the NPPF which excludes hotels as such facilities.

It has also been demonstrated that Craiglands Hotel does not operate as a “community facility”. The draft policy therefore fails to comply with the basic conditions of a Neighbourhood Plan as required by the Regulations (specifically Basic Conditions A and D). As a minimum therefore, Craiglands Hotel should be removed from the list of community facilities as set out within the policy. It is also a cumbersome policy that has not been

⁶ Planning Practice Guidance – ID: 41-056-20180222

⁷ Planning Practice Guidance – ID: 41-040-20160211

formulated based upon on a robust or well considered evidence base. It only protects facilities listed within the policy as they exist today and would not afford any protection to future such facilities. Its application would not contribute towards the promotion of sustainable development in Ilkley.

A revised and more simplified wording for the draft policy is proposed that would apply protection to all facilities (that both exist now and may exist in the future) that meet a correct definition of a “community facility” as defined by the NPPF. This would make for a more robust and practical policy and one that would satisfy the basic conditions.

We trust that these comments will be taken into consideration as part of the next stage of the preparation and examination of the plan. Indeed, in accordance with paragraph 41-056-20180222 of the PPG, we request that the examiner considers the matters raised by this representation in an oral hearing, to allow for a full examination of the issues raised to take place and to allow our Client a fair chance to fully put forward their case.

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	21749	Comment Type:	Comment
Respondent:	6290	Agent:	
Summary:			
One of the wonderful things about living in Ilkley is the sense of community - and this is subserved by the large number of public buildings it contains. So far as enhancement is concerned, one thing it could do with somewhat more of is facilities for teenagers who are rather poorly served at present.			
Full Submission:			
One of the wonderful things about living in Ilkley is the sense of community - and this is subserved by the large number of public buildings it contains. So far as enhancement is concerned, one thing it could do with somewhat more of is facilities for teenagers who are rather poorly served at present.			

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	29489	Comment Type:	Support
Respondent:	Theatres Trust [2546]	Agent:	
Summary:			
As stated in our previous 2019 representation The Trust welcomes this policy and the support and protection it provides for Ilkley’s valued cultural and leisure assets including Ilkley Playhouse and Ilkley Cinema. These facilities 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.			
Full Submission:			
As stated in our previous 2019 representation The Trust welcomes this policy and the support and protection it provides for Ilkley’s valued cultural and leisure assets including Ilkley Playhouse and Ilkley Cinema. These facilities 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.			

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	29825	Comment Type:	Object

Respondent:	NHS Property Services Ltd [7030]	Agent:	
Summary:			
<p>Policy INDP2 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS’s ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed.</p> <p>The NPPF is clear in stating that Local Plans should adopt policies that “..take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”(Paragraph 93b).</p> <p>The policy currently fails to consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.</p> <p>Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.</p> <p>With this in mind, we are keen to encourage that a greater level of flexibility be granted to the NHS via a modification of the wording of Policy INDP2. This will ensure that the NHS can promptly and efficiently respond to the healthcare needs of the residents as they arise.</p> <p>NHSPS own the freehold to The Coronation Hospital, which is allocated for protection under draft Policy INDP2/19. NHSPS wish to reiterate the need for flexibility within the NHS estate, including The Coronation Hospital site.</p> <p>Amended Wording</p> <p>We would suggest the inclusion of additional wording (in blue) be included in Policy INDP2 to make this policy more robust:</p> <p><i>“When a non-community use (e.g. housing) is proposed to replace, either by conversion or re development, one of the facilities listed below such development will only be supported when one of the following can be demonstrated:</i></p> <ul style="list-style-type: none"> <i>a. The proposal includes alternative provision, on a site within the locality, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate cycle and car parking.; or</i> <i>b. Where facilities are considered to be no longer needed or suitable for continued community facility use, satisfactory evidence is put forward by the applicant that, over a minimum period of 12 months, it has been demonstrated, through active marketing of the site, that there is no longer a need or demand for the facility; or</i> <p><i>INSERT: c. the loss or partial loss of a facility or site arises from a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities.”</i></p>			
Full Submission:			
<p>Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).</p>			
Foreword			

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

Overview

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.

The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Our comments on the policies set out within the Ilkley Neighbourhood Plan are as follows.

Policy INDP2 - Introduction

Policy INDP2 states that when a non-community use (e.g. housing) is proposed to replace, either by conversion or re-development, one of the facilities listed below such development will only be supported when one of the following can be demonstrated:

- a. The proposal includes alternative provision, on a site within the locality, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate cycle and car parking.; or
- b. Where facilities are considered to be no longer needed or suitable for continued community facility use, satisfactory evidence is put forward by the applicant that, over a minimum period of 12 months, it has been demonstrated, through active marketing of the site, that there is no longer a need or demand for the facility.

NHSPS objects to policy INDP2.

Context

Policy INDP2 fails to address the need for flexibility within the NHS estate. NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed.

The NPPF is clear in stating that Local Plans should adopt policies that “..take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. (Paragraph 93b)

The policy currently fails to consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estates. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.

Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.

With this in mind, we are keen to encourage that a greater level of flexibility be granted to the NHS via modification of the wording of Policy INDP2. This will ensure that the NHS can promptly and efficiently respond to the healthcare needs of the residents as they arise.

NHSPS own the freehold to The Coronation Hospital, which is allocated for protection under draft Policy INDP2/19. NHSPS wish to reiterate the need for flexibility within the NHS estate, including The Coronation Hospital site.

Amended Wording

We would suggest the inclusion of additional wording (in blue) be included in Policy INDP2 to make this policy more robust:

“When a non-community use (e.g. housing) is proposed to replace, either by conversion or re development, one of the facilities listed below such development will only be supported when one of the following can be demonstrated:

- a. The proposal includes alternative provision, on a site within the locality, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate cycle and car parking.; or*
- b. Where facilities are considered to be no longer needed or suitable for continued community facility use, satisfactory evidence is put forward by the applicant that, over a minimum period of 12 months, it has been demonstrated, through active marketing of the site, that there is no longer a need or demand for the facility; or*
- c. the loss or partial loss of a facility or site arises from a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities.”*

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	29830	Comment Type:	Comment
Respondent:	Ilkley Manor House Trust [7031]	Agent:	
Summary:			
<p>Ilkley Manor House Trust is committed to supporting Bradford MDC and Ilkley Town Council in delivering against policies INDP2 and INDP16 in particular, playing our part in developing tourism and leisure facilities. Our vision is to work in partnership to nurture a creative/heritage hub focused on the Manor House, The Castle Collective, Riverside Gardens, All Saints and with improved connectivity to other cultural assets, including the Playhouse and Cinema.</p> <p>This could be supported by sustainable public realm enhancements that encourage pedestrian movement and connectivity most notably around the A65 New Brook Street junction, but also connecting the Playhouse to the Manor House and Park via sustainable urban design.</p> <p>We would like to suggest a minor amendment to the text in the Plan to include All Saints Church in the description of the creative heritage hub so that it reads: <i>“...creative/heritage hub focused on the Manor House, All Saints Church, the Castle Collective, Riverside Gardens”</i>.</p>			
Full Submission:			
<p>I am writing on behalf the Ilkley Manor House Trust board of trustees to express our support for the proposed Ilkley Neighbourhood Development Plan (INDP).</p> <p>We commend the work undertaken by the Ilkley Neighbourhood Development Plan Working Group led at different stages by Town Councillors Brian Mann and Ros Brown with the help of Kirkwells.</p>			

As one of the groups affected by this Plan, and thanks to the consultation led by the Town Council, we have been engaged fully and feel confident that the INDP has the potential to address the needs and serve the aspirations of our local community.

Ilkley Manor House Trust is committed to supporting Bradford MDC and Ilkley Town Council in delivering against policies INDP2 and INDP16 in particular, playing our part in developing tourism and leisure facilities. Our vision is to work in partnership to nurture a creative/heritage hub focused on the Manor House, The Castle Collective, Riverside Gardens, All Saints and with improved connectivity to other cultural assets, including the Playhouse and Cinema.

This could be supported by sustainable public realm enhancements that encourage pedestrian movement and connectivity most notably around the A65 New Brook Street junction, but also connecting the Playhouse to the Manor House and Park via sustainable urban design.

We would like to suggest a minor amendment to the text in the Plan to include All Saints Church in the description of the creative heritage hub so that it reads: “...creative/heritage hub focused on the Manor House, All Saints Church, the Castle Collective, Riverside Gardens”.

We embrace the principle of NDPs which are part of the development plan and carry “statutory weight” when planning decisions are made. We also welcome the fact that NDPs give local people the final say on the plan for the area through a referendum.

Finally, we note that NDPs can bring a financial benefit to an area and that CBMDC have introduced a levy on future development called the Community Infrastructure Levy (CIL). We are pleased to read that if Ilkley has a finalised INDP the town will receive 25% of any CIL collected in the area. We hope that Ilkley Manor House will be considered for contributions in the event of CIL allocations in future.

We hope that if this plan is adopted, we can all use it to support the future development of Ilkley to best serve the needs of current and future generations.

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	29834	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			
<p>There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. 			

- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.

Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites

improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	29850	Comment Type:	Comment
Respondent:	All Saints Parish Church (PCC) [7037]	Agent:	Clive Brook Planning [536]

Summary:

Apart from a brief listing of the Church/Link Building/Church House under policy INDP2 as a community facility to be protected and enhanced there is no further reference to the considerable heritage significance of these buildings in association with the Manor House.

In submitting these comments we recognise that the current plan going forward for adoption, while it is based on local knowledge and expertise, in its present form is only able to deal with preferred policies and their background justification. A subsequent version of the Plan will have very significant added content on several key issues for the town including specific residential and employment developments and actions related to climate change and environmental enhancements. There is scope in future for specific enhancement plans for the major heritage hub comprising the Church, Link, Church House and Manor house and it is necessary to distinguish this and its great historical significance from the wider cultural connections listed including the Playhouse etc.

Policy INDP2 does list the Church/Link/ Church House. The policy background states that planning only deals with land use matters and the physical aspects of buildings. This is not the case as sustainable development now includes social considerations including health and wellbeing of communities so that the uses of buildings and the services they provide can be and often are a material planning consideration. The wording should be revised to reflect the wider significance and uses of important community buildings.

Full Submission:

I set out below our response to the pre-adoption consultation on the Ilkley Neighbourhood Plan. This has been prepared in co-operation with our neighbours the Manor House Trust (MHT). We liaise closely with the Trust on a number of matters relating to heritage interpretation, the use of our respective buildings and land ownerships and provision of public access to the buildings for a variety of community uses. While the principal focus of the Church is on Christian worship and outreach into the wider community we are also making our buildings available for a wide range of community uses with a renewed programme being progressed following the long period of closure due to the Covid pandemic. An example is the Ilkley Literature Festival when we will host several events. The Ilkley Food Bank are a tenant in the ground floor of Church House. The Church dates back to the seventh century and contains strong physical evidence of an earlier Anglo Saxon Church and also houses a number of significant heritage assets. As part of the recent comprehensive renovation of our buildings we have incorporated high quality heritage interpretation material and specialist lighting with financial assistance from the HLF.

The above context will we trust help to explain our specific comments on the INP which are as follows:-

Apart from a brief listing of the Church/Link Building/Church House under policy INDP2 as a community facility to be protected and enhanced there is no further reference to the considerable heritage significance of these buildings in association with the Manor House.

In submitting these comments we recognise that the current plan going forward for adoption, while it is based on local knowledge and expertise, in its present form is only able to deal with preferred policies and their background justification. A subsequent version of the Plan will have very significant added content on several key issues for the town including specific residential and employment developments and actions related to climate change and environmental enhancements. There is scope in future for specific enhancement plans for the major heritage hub comprising the Church, Link, Church House and Manor house and it is necessary to distinguish this and its great historical significance from the wider cultural connections listed including the Playhouse etc.

Policy INDP2 does list the Church/Link/ Church House. The policy background states that planning only deals with land use matters and the physical aspects of buildings. This is not the case as sustainable development now includes social considerations including health and wellbeing of communities so that the uses of buildings and the services they provide can be and often are a material planning consideration. The wording should be revised to reflect the wider significance and uses of important community buildings.

Policy INDP8 Ilkley Conservation Area: We welcome the inclusion of the Roman Fort and Historic Centre and the proposed content on enhancing the setting. Reference should be made to the historic core made up of Church and Manor House as a heritage asset of at least city- region to regional significance. This is an important statement in many respects- cultural, leisure, tourism but of equal significance spiritual contributions to health and wellbeing which are now also a material planning consideration. Such a policy and future implementation content could assist the Church and Manor House in obtaining future grants for enhancements. A site/location specific policy would be appropriate in the current version of the INP which recognises the great significance of the historic core for all purposes associated with such heritage assets.

Policy INDP 16 Leisure and Tourism: Propose added wording to the section on Creative Heritage Hub- as follows: “the core of which is focussed and historically centred on the former Roman Fort and subsequent Anglo-Saxon settlement now occupied by the two most important historic buildings in the town - the Church and Manor House (as recognised in their listing status as Grade 1 and II* buildings”.

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities		
Representation ID:	29860	Comment Type:	Comment
Respondent:	6068	Agent:	
Summary:			

Please be aware that Housing Site Allocation INDP2/2 has boundaries adjacent with two primary schools. I am not in support of this allocated site given its location and its use by the community for sporting events, etc. For INDP2/2, given its location, any potential future developments must take into account mitigating or avoiding any unacceptable risks (eg noise and dust levels) during its development, especially given the vulnerable adjacent site users, that is, the children.

Full Submission:

Please be aware that Housing Site Allocation INDP2/2 has boundaries adjacent with two primary schools. I am not in support of this allocated site given its location and its use by the community for sporting events, etc. For INDP2/2, given its location, any potential future developments must take into account mitigating or avoiding any unacceptable risks (eg noise and dust levels) during its development, especially given the vulnerable adjacent site users, that is, the children.

I support the plan that has been proposed in particular the policy to reuse previously developed land in favour of greenfield or greenbelt land where applicable and within the conditions mentioned with the consultation plan document. I also consider that green belt land should be protected for all the reasons stated and more.

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities (Policy and Paras 5.9 to 5.12)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	

Summary:

It should be noted that on 1st August 2021, new legislation came into force regarding changes of use under permitted development rights. There was an expansion of these rights affecting the whole of E use class (shops, offices, restaurants, cafes, health services, nurseries, gyms and leisure).

The Town and Country Planning (General Permitted Development Etc.) (England) (Amendment) Order 2021 made a number of amendments to permitted development rights. It introduced a new permitted development right to allow for the change of use from the Commercial, Business and Service use (Class E) to residential use (Class C3).

Full Submission:

It should be noted that on 1st August 2021, new legislation came into force regarding changes of use under permitted development rights. There was an expansion of these rights affecting the whole of E use class (shops, offices, restaurants, cafes, health services, nurseries, gyms and leisure).

The Town and Country Planning (General Permitted Development Etc.) (England) (Amendment) Order 2021 made a number of amendments to permitted development rights. It introduced a new permitted development right to allow for the change of use from the Commercial, Business and Service use (Class E) to residential use (Class C3).

Consultation point:	Policy INDP2: Protecting and Enhancing Community Facilities (INDP2/8 & Policies Map)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	

Summary:

Part of the area shown on the Policies Maps designated under Policy INDP2/8 as a community facility overlaps with part of a proposed housing allocation in the preferred options (Regulation 18) version of the emerging Bradford District Local Plan (2020 to 2038) – Site Ref: IL4/H: Stockheld Road. The area in question is currently a car park.

Full Submission:

Part of the area shown on the Policies Maps designated under Policy INDP2/8 as a community facility overlaps with part of a proposed housing allocation in the preferred options (Regulation 18) version of the emerging Bradford District Local Plan (2020 to 2038) – Site Ref: IL4/H: Stockheld Road. The area in question is currently a car park.

10. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP3

Consultation point:	Policy INDP3: Protecting and Enhancing Recreation Facilities		
Representation ID:	29835	Comment Type:	Comment
Respondent:	Yorkshire Wildlife [4640]	Agent:	
Summary:			
<p>There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. 			
Full Submission:			
<p>Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.</p> <p>Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.</p> <p>We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.</p>			

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP3: Protecting and Enhancing Recreation Facilities		
Representation ID:	29874	Comment Type:	Comment
Respondent:	Redrow Homes [7009]	Agent:	Johnson Mowat [7040]

Summary:

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

Full Submission:

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

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

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

Vision and Objectives

Redrow welcome the Ilkley 2030 Vision which seeks a vibrant, viable, sustainable and successful town by 2030. Objective “Sustainable Residential Development” is supported as a crucial objective in achieving the Vision to help secure sustainable development. It is considered that land off Wheatley Lane, to the rear of existing development on Wheatley Lane will provide the opportunity of assisting in meeting the Vision and Objective 1. The site is located in a sustainable location, on the edge of Ben Rhydding. It is close to existing services and facilities, with excellent public transport links (bus services and Ben Rhydding Train Station). The development of this site provides an opportunity for creating a scheme to form an important gateway development when entering into Ilkley from the east, and its allocation via the Local Plan will contribute to a robust housing supply in Ilkley, reducing pressure on other sites from speculative development.

Policy INDP1 - New housing Development within Ilkley

It is welcomed that the Ilkley Neighbourhood Plan acknowledges that it is for the Bradford Local Plan to establish the revision of Green Belt boundaries and not a matter for the neighbourhood plan process. In this

regard the Neighbourhood Plan Policies Map does not identify Green Belt, or individual housing sites therefore allowing for the Local Plan process to establish Green Belt revisions and allocated housing sites.

This is a sensible approach as it allows for the Neighbourhood Plan to align with the future Local Plan.

The minimum density requirements of 30 dwellings per hectare on (most) housing schemes, and appropriate mix of housing types, sizes and tenures on housing sites above 10 dwellings as set out in Policy INDP1 is deemed appropriate and the policy wording allows for flexibility. Redrow are confident that an appropriately designed scheme at Wheatley Lane (IL/013) can be delivered to meet Policy INDP1 requirements. The background text to this policy (paragraphs 5.3 and 5.4) requires updating to reflect the change in Council’s policy preparation. The Council are no longer preparing a Core Strategy Partial Review and Allocations DPD and are instead preparing a composite Local Plan.

Policy INDP3 - Protecting and Enhancing Recreation Facilities

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

Policy INDP5 - Encouraging High Quality and Zero Carbon Design

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

Policy INDP13 - Protecting and Enhancing Biodiversity

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

11. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP4

Consultation point:	Policy INDP4: Allotments and Community Gardens		
Representation ID:	25509	Comment Type:	Object
Respondent:	2231	Agent:	
Summary:			
<p>The number of allotments should be reduced to the minimum legal requirement. They take land which could otherwise be available to everyone in the community to use, and instead grant exclusive use to one person (at best, one family), at the expense of everyone else.</p> <p>I do not support the spending of public money on community orchards - no more should be created. Trees are all well and good, but apple trees are not the best species for wildlife, and any suggestion that they add significantly to the food supply is ridiculous. The existing community orchards are vanity projects of Ilkley Town Council, and should not be indulged with scarce public money.</p>			
Full Submission:			

The number of allotments should be reduced to the minimum legal requirement. They take land which could otherwise be available to everyone in the community to use, and instead grant exclusive use to one person (at best, one family), at the expense of everyone else.

I do not support the spending of public money on community orchards - no more should be created. Trees are all well and good, but apple trees are not the best species for wildlife, and any suggestion that they add significantly to the food supply is ridiculous. The existing community orchards are vanity projects of Ilkley Town Council, and should not be indulged with scarce public money.

Consultation point:	Policy INDP4: Allotments and Community Gardens		
Representation ID:	29819	Comment Type:	Support
Respondent:	798	Agent:	
Summary:			
St Johns Community garden provides access to training and leisure for adults with learning difficulties through a CTI charity managed project. Fronting on to a popular walking route, it is also highly valued by many residents and passers by as a publicly available and visible allotment, garden and biodiverse habitat.			
Full Submission:			
St Johns Community garden provides access to training and leisure for adults with learning difficulties through a CTI charity managed project. Fronting on to a popular walking route, it is also highly valued by many residents and passers by as a publicly available and visible allotment, garden and biodiverse habitat.			

Consultation point:	Policy INDP4: Allotments and Community Gardens		
Representation ID:	29836	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			
<p>There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. 			

- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

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- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website:

<https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

These policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recovery. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP4: Allotments and Community Gardens		
Representation ID:	29877	Comment Type:	Comment
Respondent:	7041	Agent:	
Summary:			
I fully support preservation of existing allotments and provision of as many new suitable sites as possible, in recognition of the positive impact on mental and social wellbeing for users and the community			
Full Submission:			
I fully support preservation of existing allotments and provision of as many new suitable sites as possible, in recognition of the positive impact on mental and social wellbeing for users and the community			

Consultation point:	Policy INDP4: Allotments and Community Gardens		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>It is considered that the policy should include headings in order to improve its readability and aid interpretation. There is a need to consider the wording of point b) and whether it is appropriate to give an example within the policy text.</p> <p>The wording/structure of the point relating to new allotment provision should be revised. As drafted it is difficult to understand the application of the various criteria. It may be more appropriate to set out the criteria using a series of bullet points.</p> <p>The example of the land on Wheatley Lane is repeated in the final paragraph of the policy. It considered that should no longer be included. It is noted that this paragraph states that land for new allotments will be identified and explored, subject to suitability.</p> <p>The plan does not contain any further detail in relation to how this will be undertaken or whether sites have been identified.</p>			
Full Submission:			
<p>It is considered that the policy should include headings in order to improve its readability and aid interpretation. Those suggested are as follows:</p> <ul style="list-style-type: none"> • Protecting Existing Allotments/Community Gardens • Community Orchards; • New Allotment Provision <p>There is a need to consider the wording of point b) and whether it is appropriate to give an example within the policy text. The aim of the criteria is to achieve a better geographic spread of allotments if existing allotment provision is subject to redevelopment. It is suggested that the following wording is used and that the example is no longer included:</p> <p><i>“Where it contributes to a better geographic spread of allotment facilities within the neighbourhood area and improves access for local people to them, through the identification of land for new allotments, subject to it being suitable”</i></p> <p>It is considered that the wording/structure of the point relating to new allotment provision should be revised. As drafted it is difficult to understand the application of the various criteria. It may be more appropriate set the criteria out as a series of bullet points. The following is suggested as alternative wording.</p> <p><u>“New Allotment Provision</u></p> <p><i>New allotment provision will be supported:</i></p> <ul style="list-style-type: none"> • <i>in the Green Belt provided that it preserves the openness of the Green Belt and does not conflict with the purposes of the Green Belt; or</i> • <i>where it is within reasonable walking distance of residential areas and schools: and</i> • <i>where it would not have a significant detrimental impact on residential amenity, the setting of a Conservation Area, or the local landscape”.</i> <p>The example of the land on Wheatley Lane is repeated in the final paragraph of the policy. It considered that should no longer be included. It is noted that this paragraph states that land for new allotments will be identified and explored, subject to suitability.</p>			

The plan does not contain any further detail in relation to how this will be undertaken or whether sites have been identified.

12. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP5

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design (Objective 3)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The heritage and design sections appear to align with CBMDC’s Core Strategy policies and do not appear to contain anything contentious and are not over-ambitious.			
Full Submission:			
The heritage and design sections appear to align with CBMDC’s Core Strategy policies and do not appear to contain anything contentious and are not over-ambitious. It is observed that recognising Ilkley as a settlement where its heritage and character is very evident and influential, the heritage sections of the Plan could be regarded as somewhat ‘safe’ and unexceptional. Given the presence in Ilkley of a very active and influential Civic Society, the current drive to establish lists of Non-Designated Heritage Assets, and the presence of these in most other evolving NPs, that there is some surprise that no mention whatsoever of this in this draft. Ilkley is a location where recognition of NDHAs is most likely to occur and would be of benefit to good Planning.			

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design		
Representation ID:	29853	Comment Type:	Comment
Respondent:	Burley Parish Council [146]	Agent:	
Summary:			
Given that climate-change and net-zero must be achieved by 2050, that Bradford Council has declared a climate emergency and that there is an earlier net-zero carbon date of 2038, should we not be mandating the inclusion of renewable energy with every build? Proposals should not only meet the needs of the local community, but the global community. The pros and cons to acting now are: Cons.			
<ul style="list-style-type: none"> • Short term cost implications at time of purchase on new builds. • If Council do not address the cost of zero emission/carbon neutral homes up front, we’re effectively just kicking the cost further down the line. • Future cost of making homes zero emission/carbon neutral is an issue government is currently trying to address on older housing stock. Many people will not be able to afford the upgrade cost (no economies of scale, complex installation), so work may never be carried out. A good analogy would be the introduction of solar panels. Consider how few homes have migrated to solar to date. • Further government subsidies to encourage take up of zero-carbon measures are a cost burden to the taxpayer. These subsidies could be put to better use elsewhere in the economy. 			

- Carbon output will be maintained until such time that zero carbon upgrades are installed, making it more difficult to achieve defined Carbon targets both locally and nationally.

Pros.

- House builders and developers have the economies of scale to make homes zero emission/carbon neutral far more cheaply than individual homeowners/landlords.
- Zero percent VAT on these technologies at build, another opportunity to save money.
- This technology is far more easily installed before build, ready at point of sale.
- Installation up front will work out cheaper than delayed upgrade.
- Immediate CO2 benefits delivered towards government and local authority aspirations for a zero-carbon economy.
- Mortgage terms of 20 years plus, mean that this cost is spread over the term and is likely to be a minimal monthly charge.
- Immediate energy savings will help to offset the additional purchase and mortgage costs.

Full Submission:

INDP5 and Policy SC2 “Renewable Energy”

The INDP supports proposals for individual and community scale renewable and low carbon energy generation that is “community-led” or “meets the needs” of the local community. This includes from solar photovoltaic panels and proposals for standalone renewable energy developments subject to the following criteria:

- the siting and scale of the proposed development is appropriate to its setting and position in the wider landscape; and
- the proposed development does not create an unacceptable impact on the amenities of local residents; and
- the proposed development does not have an unacceptable impact on a feature of natural or biodiversity importance”.

Given that climate-change and net-zero must be achieved by 2050, that Bradford Council has declared a climate emergency and that there is an earlier net-zero carbon date of 2038, should we not be mandating the inclusion of renewable energy with every build? Proposals should not only meet the needs of the local community, but the global community.

The pros and cons to acting now are:

Cons.

- Short term cost implications at time of purchase on new builds.
- If Council do not address the cost of zero emission/carbon neutral homes up front, we’re effectively just kicking the cost further down the line.
- Future cost of making homes zero emission/carbon neutral is an issue government is currently trying to address on older housing stock. Many people will not be able to afford the upgrade cost (no economies of scale, complex installation), so work may never be carried out. A good analogy would be the introduction of solar panels. Consider how few homes have migrated to solar to date.
- Further government subsidies to encourage take up of zero-carbon measures are a cost burden to the taxpayer. These subsidies could be put to better use elsewhere in the economy.
- Carbon output will be maintained until such time that zero carbon upgrades are installed, making it more difficult to achieve defined Carbon targets both locally and nationally.

Pros.

- House builders and developers have the economies of scale to make homes zero emission/carbon neutral far more cheaply than individual homeowners/landlords.

- Zero percent VAT on these technologies at build, another opportunity to save money.
- This technology is far more easily installed before build, ready at point of sale.
- Installation up front will work out cheaper than delayed upgrade.
- Immediate CO2 benefits delivered towards government and local authority aspirations for a zero-carbon economy.
- Mortgage terms of 20 years plus, mean that this cost is spread over the term and is likely to be a minimal monthly charge.
- Immediate energy savings will help to offset the additional purchase and mortgage costs.

INDP13 Protecting and Enhancing Biodiversity - Policy SC8, EN2

“..including the Local Wildlife Sites identified on the Policies Map, should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity.

Reference should also be made to “Homes and Neighbourhoods: a Guide to Designing in Bradford”. This sets out ways that wildlife and green features can be integrated into developments at a variety of levels, (neighbourhoods, streets and individual housing). New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation and provide new opportunities to extend biodiversity.

New government guidance, that is due to come into force in October 2022, is omitted from this statement. Net gains in biodiversity will then be set at 10%+, a more difficult target to attain. Whilst applications may come forward in the period between now and October 2022, it’s important to recognise and be working towards this change, and with good reason. There are currently more than 1.1 million homes that have been given planning permission over the last decade which are still yet to be built. That’s the issue here, you can apply to build, receive planning permission, and then delay the build, effectively mitigating the need to conform to new biodiversity targets. I think that biodiversity needs to align with commencement of new builds as opposed to the date a planning application is approved.

Also absent is any mention of impacts to the Area of Outstanding Natural Beauty (AONB) adjacent to Ilkley. Whilst not relevant to the INDP, it’s relevant to Bradford’s HRA.

INDP14 Traffic and Transport

“To support the development of sustainable multi-modal transport and reduce vehicle emissions development will be expected to show how measures promote active and healthy lifestyles and help make walking, cycling and the use of public transport a first choice for all and reduce the need to travel by private car. In particular, proposals should seek to incorporate sustainable multi-modal transport solutions and infrastructure which focus on emissions reduction (e.g. car parking spaces and charging facilities in accessible, convenient and safe places for plug-in and other ultra-low emission vehicles). The INDP promotes the use of mobility sharing schemes such as car clubs, car sharing and electric bike clubs.”

Should we not also reference rail travel as the most important element of sustainable travel as it’s at the heart of Bradford’s net zero carbon proposals? There are no plans to improve rail travel in the foreseeable future (2028 in the WYCA plan, if station infrastructure across the network can accommodate 6 carriage trains). Road and bus connectivity to Bradford and the Aire Valley employment centres are very poor. Are these too not multi-modal transport solutions capable of moving both goods and people? The Local Plan has already established that “At peak times these services already run at capacity” and “that upgrading should be considered”.

INDP16 Leisure and Tourism

“Development of existing and new tourism and leisure facilities will be supported where such development 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”.

Leisure and Tourism will undoubtedly affect the areas which the INDP seeks to protect. As this policy in the INPD is driven by Bradford policies EC1 & EC4, should you not include reference to mitigation measures provided by Bradford Council. We note that a warden service is being introduced during working hours, although the Parish Council does not believe that this will completely mitigate the impact of tourism.

Wardens are to be financed from CIL contributions from developments bordering the SPA/SAC, however, there's a chequered history of CIL payments with many not being paid. Therefore, how are we to ensure that the Warden service will be maintained?

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design		
Representation ID:	29875	Comment Type:	Support
Respondent:	Redrow Homes	Agent:	Johnson Mowat [7040]

Summary:

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

Full Submission:

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

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

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

Vision and Objectives

Redrow welcome the Ilkley 2030 Vision which seeks a vibrant, viable, sustainable and successful town by 2030. Objective 1 “£Sustainable Residential Development” is supported as a crucial objective in achieving the Vision to help secure sustainable development. It is considered that land off Wheatley Lane, to the rear of existing development on Wheatley Lane will provide the opportunity of assisting in meeting the Vision and Objective 1. The site is located in a sustainable location, on the edge of Ben Rhydding. It is close to existing services and facilities, with excellent public transport links (bus services and Ben Rhydding Train Station). The development of this site provides an opportunity for creating a scheme to form an important gateway development when entering into Ilkley from the east, and its allocation via the Local Plan will contribute to a robust housing supply in Ilkley, reducing pressure on other sites from speculative development.

Policy INDP1 - New housing Development within Ilkley

It is welcomed that the Ilkley Neighbourhood Plan acknowledges that it is for the Bradford Local Plan to establish the revision of Green Belt boundaries and not a matter for the neighbourhood plan process. In this

regard the Neighbourhood Plan Policies Map does not identify Green Belt, or individual housing sites therefore allowing for the Local Plan process to establish Green Belt revisions and allocated housing sites.

This is a sensible approach as it allows for the Neighbourhood Plan to align with the future Local Plan.

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

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

Policy INDP3 - Protecting and Enhancing Recreation Facilities

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

Policy INDP5 - Encouraging High Quality and Zero Carbon Design

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

Policy INDP13 - Protecting and Enhancing Biodiversity

This draft policy refers to all developments being expected to result in measurable biodiversity net gain.

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

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design		
Representation ID:	29878	Comment Type:	Comment
Respondent:	7041	Agent:	
Summary:			
<p>I support measures that allow development that aims for zero carbon design, even if it uses materials that are different to the "traditional" building materials of Ilkley. I think we need to move with the times, not be stuck in the past. There is a climate emergency, and the beauty of our natural environment, plus our traditional built environment, is directly threatened by this emergency.</p> <p>I would not be happy with increasing street lighting without consultation. Beverley Rise has older style lights which are generally low impact, I have seen some modern lights in other areas of England that are incredibly bright and tall and intrusive on the neighbouring houses, not to mention the detrimental impact they have on wildlife from light pollution</p>			
Full Submission:			
<p>I support measures that allow development that aims for zero carbon design, even if it uses materials that are different to the "traditional" building materials of Ilkley. I think we need to move with the times, not be stuck</p>			

in the past. There is a climate emergency, and the beauty of our natural environment, plus our traditional built environment, is directly threatened by this emergency.

I would not be happy with increasing street lighting without consultation. Beverley Rise has older style lights which are generally low impact, I have seen some modern lights in other areas of England that are incredibly bright and tall and intrusive on the neighbouring houses, not to mention the detrimental impact they have on wildlife from light pollution

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Part j) - it is queried whether or not street trees help to reduce traffic speed. In addition, it is suggested that this element of the policy could be strengthened to reflect policy set out in paragraph 131 of the NPPF (July 2021) which requires new streets to be tree lined.			
Full Submission:			
Part j) - it is queried whether or not street trees help to reduce traffic speed. In addition, it is suggested that this element of the policy could be strengthened to reflect policy set out in paragraph 131 of the NPPF (July 2021) which requires new streets to be tree lined.			

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Part k) - this part of the policy is broadly in line with Core Strategy Policy SC2D(2) which seeks to ensure new development contributes to the sustainable use of resource and reduction in environmental impact by achieving high standards of energy efficiency. A similar approach is carried forward into the emerging Local Plan Policy HO9. The topic of energy efficiency is also highlighted in CBMDC's Homes & Neighbourhoods Design Guide SPD.			
Queries whether the policy is justified by evidence, in line with policy, and deliverable. Has consideration been given to how may affect viability.			
Inclusion the Merton Rule should be reconsidered			
Policy requires local requirements to reflect Government policy for national technical standards. Policy needs to be framed within outcome of Government's consultation on the Future Homes Standard.			
Full Submission:			
Part k) - this part of the policy is broadly in line with Core Strategy Policy SC2D(2) which seeks to ensure new development contributes to the sustainable use of resource and reduction in environmental impact by achieving high standards of energy efficiency. A similar approach is carried forward into the emerging Local Plan Policy HO9. The topic of energy efficiency is also highlighted in CBMDC's Homes & Neighbourhoods Design Guide SPD.			
It is queried whether the policy approach is justified by any evidence, in line with development plan/national policy, and deliverable. In respect of the former has any consideration been given as to how it many affect			

development viability, whilst regarding the latter whether the council is able to consider and monitor sustainability statements.

The inclusion of reference to the Merton Rule should be reconsidered. The plan does not set out any justification as to why it has been included.

National planning policy requires any local requirements for the sustainability of buildings to reflect Government’s policy for national technical standards.

Accordingly, this policy needs to be framed within outcome to Government’s consultation on the Future Homes Standard. This will result in changes to the Parts L (conservation of fuel and power) and F (ventilation) of the Building Regulations to improve the energy efficiency of new homes.

The new Future Homes Standard should ensure that all new homes built from 2025 will produce 75% to 80% less carbon emissions than homes delivered under current regulations.

The first update to the Building Regulations is schedule for 2021 to ensure that new homes built from 2022 produce 31% less carbon emissions compared with current standards. Further consultation will take place in 2023.

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
As drafted part n) of this policy appears to be making two different policy points covering retrofitting of historic buildings to improve energy efficiency and seeking to ensure that dwellings are adaptable over time. Accordingly, it is suggested that it is separated into two criteria. The latter point would also appear to be similar to point e) of policy INDP21			
Full Submission:			
As drafted part n) of this policy appears to be making two different policy points covering retrofitting of historic buildings to improve energy efficiency and seeking to ensure that dwellings are adaptable over time. Accordingly, it is suggested that it is separated into two criteria. The latter point would also appear to be similar to point e) of policy INDP21			

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Point r) contains repetition of point l) – these points should be combined.			
Full Submission:			
Point r) contains repetition of point l) – these points should be combined.			

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design (Para 5.21)		
Representation ID:		Comment Type:	Comment

Respondent:	City of Bradford MDC	Agent:	
Summary:			
Is reference to the Sustainable Design Guide SPD still appropriate?			
Full Submission:			
Is reference to the Sustainable Design Guide SPD still appropriate?			

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design (Para 5.23)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
This is repetition of earlier policies and not appropriate as part of the justification of this policy.			
Full Submission:			
This is repetition of earlier policies and not appropriate as part of the justification of this policy.			

Consultation point:	Policy INDP5: Encouraging High Quality and Zero Carbon Design (Para 5.26)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
This is repetition of earlier policies and not appropriate as part of the justification of this policy.			
Full Submission:			
This is repetition of earlier policies and not appropriate as part of the justification of this policy.			

13. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP6

Consultation point:	Policy INDP6: General Principles for New Development in Conservation Areas in Ilkley		
Representation ID:	29826	Comment Type:	Comment
Respondent:	7014	Agent:	
Summary:			
<p>Ilkley has 4 scheduled monuments - the site of the Roman Fort, the 3 pre Conquest crosses in Ilkley Parish Church, Ilkley Moor cup and ring marked stones, and the Old Bridge at the bottom of Stockeld Road.</p> <p>The Ilkley Neighbourhood Development Plan makes no reference to these monuments (merely to heritage assets).</p> <p>I feel this is an omission especially in relation to the Old Bridge and its close proximity to the possible housing site at the junction of Stockeld Road and Bridge Lane earmarked for about 10 housing units.</p>			

I appreciate this site and the Old Bridge are within the Ilkley Conservation Area but enhanced protection is essential to preserve the setting of the Old Bridge.

Full Submission:

Ilkley has 4 scheduled monuments - the site of the Roman Fort, the 3 pre Conquest crosses in Ilkley Parish Church, Ilkley Moor cup and ring marked stones, and the Old Bridge at the bottom of Stockeld Road.

The Ilkley Neighbourhood Development Plan makes no reference to these monuments (merely to heritage assets).

I feel this is an omission especially in relation to the Old Bridge and its close proximity to the possible housing site at the junction of Stockeld Road and Bridge Lane earmarked for about 10 housing units.

I appreciate this site and the Old Bridge are within the Ilkley Conservation Area but enhanced protection is essential to preserve the setting of the Old Bridge

ADDITIONAL EMAIL 03/09/2021 -

Dear Neighbours,

As you know the INDP trundles on through its statutory process and the draft is now out for public consultation. It still has months to go to implementation, having to be examined by a Government Planning Inspector early 2022 and then put to the whole Ilkley District for a public referendum in May 2022. It has been going on a long time already since when I was Chair of the Ilkley Design Statement Group between 2012 and 2017. As result I am fully aware of the background and so you might say we are now on the last lap. The INDP cannot of course stray outside the existing Bradford Local Plan and Core Strategy nor the National Planning Policy Framework.

Once adopted it will be an important planning blueprint governing decisions for all kinds of local development for the next fifteen years or so. Bradford Council require Ilkley to provide 1,000 new homes by 2030 and with an average household occupation of 2.3, there will be an increase in the population of 2,300. In general the INDP will support residential developments that are well related to the existing built environment and conserve the natural environment, are of high quality, and move to zero carbon design. I am commenting below only on the housing aspects of the INDP in particular with reference to the potential housing site close to us at the junction of Stockeld Road and Bridge Lane (“the Site”) opposite the Old Bridge. I will send next a plan showing the Site and from which you will particularly note the Church car park is excluded from the potential housing development site . I have referred to potential housing site as, at this stage, the INDL is not “site specific”. Individual housing sites will I understand be the subject of a separate report and plan supplemental to the Core Strategy currently in preparation by Bradford Council for further local consultation. Any plan like the INDP is always a moving picture.

1. The Site is within the Ilkley Conservation Area (ICA) as is the Sacred Heart RC Church and its car park and the Old Bridge itself, but not our Old Bridge Rise development nor the Vaults pub. As you will see from the plan the ICA boundary runs down Stockeld Road. The draft INDP states that development of sites within the ICA will be required to protect key views and demonstrate careful consideration of any potential impacts on the setting of the ICA and other nearby heritage assets (NB the close proximity to the Site of the Old Bridge) and to put in place measures to avoid or minimise impact or mitigate damage. The INDP goes on to say new development should be designed sensitively to ensure the ICA’s special characteristics are preserved and enhanced. This is a positive obligation (as opposed to meeting specified planning criteria) on any potential developer. Overall, development should reflect the scale, mass, height and form of existing locally characteristic buildings, and design details and materials should be chosen to be harmonious with neighbouring properties. Also there will be a presumption against infilling of visually important gaps in the ICA which provide a green break between terraced areas. The Site will not fall into this category.
2. The INDP also designates Sacred Heart RC Church including its car park (and for completeness the Vaults and Riverside pubs} as existing establishments to be retained and thus would give further protection for

the car park. These areas (yellow on plan) could then be developed for housing only if alternative provision were made in the locality

3. The Site is not designated by the INDP as a green space nor green corridor basically because the Site is privately owned by the Church and not open to the public. It is not green belt and in any event green belt is outside the remit of the INDP and the subject of a further review by the Bradford Council.
4. If the Site is to be developed in the future for less than 10 units then there is no requirement for a mixed development (ie starter or affordable homes). We may be looking at a small development similar to the recent new housing close to the Manor House on the site of the former lock-up garages, assuming of course at the end of the day that the Church is prepared to sell the land.
5. Ilkley has 4 scheduled monuments - the site of the Roman Fort; the 3 pre-Conquest crosses in Ilkley Parish Church; Ilkley Moor cup and ring marked stones and earthworks; and the Old Bridge. INDP makes no reference to these monuments (merely to heritage assets) which I feel is an omission especially in relation to the Old Bridge and its close proximity to the Site. This is the only comment I propose putting to Bradford Council by way of copy of this email to the Council.

Consultation point:	Policy INDP6: General Principles for New Development in Conservation Areas in Ilkley		
Representation ID:	29837	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	

Summary:

There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.

We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.
 Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which

work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and

select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP6: General Principles for New Development in Conservation Areas in Ilkley		
Representation ID:	29991	Comment Type:	Comment
Respondent:	Historic England [101]	Agent:	

Background text - Paragraph 5.27

This paragraph states that all CBMDC Conservation Area Appraisals should be updated every 5 years. However, Ben Rhydding and Ilkley's were last appraised in 2006, whilst Middleton's was appraised in 2009. The Conservation Area Assessments date from 2003, 2002 and 2003 respectively.

Recommendation:

An opportunity exists for the community to review the Conservation Areas, in conjunction with Council, to assess their current condition, whether the boundary remains appropriate, and whether change since the last appraisal has been positive, neutral or negative. Policies and recommendations could be developed and incorporated within the Neighbourhood Plan to enhance the protection of the Conservation Areas.

Full Submission:

Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan. We are responding to the request in your e-mail of 14th September 2021.

We have highlighted the fact that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation 14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012. We are therefore providing comments on the understanding that the Submission Draft may need to be amended, and if this is the case, a further consultation may be required.

14. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP7

Consultation point:	Policy INDP7: New Development in Ben Rhydding Conservation Area		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	

The inclusion in the policy of the following wording “Development should connect with existing pathways and alleyways to encourage walking and cycling and support permeable, accessible movement within the area” is noted and supported.

Full Submission:

The inclusion in the policy of the following wording “Development should connect with existing pathways and alleyways to encourage walking and cycling and support permeable, accessible movement within the area” is noted and supported.

15. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP8

Consultation point:	Policy INDP8: New Development in Ilkley Conservation Area		
Representation ID:	29851	Comment Type:	Comment
Respondent:	All Saints Parish Church (PCC) [7037]	Agent:	Clive Brook Planning [536]

Summary:

Policy INDP8 Ilkley Conservation Area: We welcome the inclusion of the Roman Fort and Historic Centre and the proposed content on enhancing the setting. Reference should be made to the historic core made up of Church and Manor House as a heritage asset of at least city- region to regional significance. This is an important statement in many respects- cultural, leisure, tourism but of equal significance spiritual contributions to health and wellbeing which are now also a material planning consideration. Such a policy and future implementation content could assist the Church and Manor House in obtaining future grants for enhancements. A site/location specific policy would be appropriate in the current version of the INP which recognises the great significance of the historic core for all purposes associated with such heritage assets.

Full Submission:

I set out below our response to the pre-adoption consultation on the Ilkley Neighbourhood Plan. This has been prepared in co-operation with our neighbours the Manor House Trust (MHT). We liaise closely with the Trust on a number of matters relating to heritage interpretation, the use of our respective buildings and land ownerships and provision of public access to the buildings for a variety of community uses. While the principal focus of the Church is on Christian worship and outreach into the wider community we are also making our buildings available for a wide range of community uses with a renewed programme being progressed following the long period of closure due to the Covid pandemic. An example is the Ilkley Literature Festival when we will host several events. The Ilkley Food Bank are a tenant in the ground floor of Church House. The Church dates back to the seventh century and contains strong physical evidence of an earlier Anglo Saxon Church and also houses a number of significant heritage assets. As part of the recent comprehensive renovation of our buildings we have incorporated high quality heritage interpretation material and specialist lighting with financial assistance from the HLF.

The above context will we trust help to explain our specific comments on the INP which are as follows:-
 Apart from a brief listing of the Church/Link Building/Church House under policy INDP2 as a community facility to be protected and enhanced there is no further reference to the considerable heritage significance of these buildings in association with the Manor House.

In submitting these comments we recognise that the current plan going forward for adoption, while it is based on local knowledge and expertise, in its present form is only able to deal with preferred policies and their background justification. A subsequent version of the Plan will have very significant added content on several key issues for the town including specific residential and employment developments and actions related to

climate change and environmental enhancements. There is scope in future for specific enhancement plans for the major heritage hub comprising the Church, Link, Church House and Manor house and it is necessary to distinguish this and its great historical significance from the wider cultural connections listed including the Playhouse etc.

Policy INDP2 does list the Church/Link/ Church House. The policy background states that planning only deals with land use matters and the physical aspects of buildings. This is not the case as sustainable development now includes social considerations including health and wellbeing of communities so that the uses of buildings and the services they provide can be and often are a material planning consideration. The wording should be revised to reflect the wider significance and uses of important community buildings.

Policy INDP8 Ilkley Conservation Area:- We welcome the inclusion of the Roman Fort and Historic Centre and the proposed content on enhancing the setting. Reference should be made to the historic core made up of Church and Manor House as a heritage asset of at least city- region to regional significance. This is an important statement in many respects- cultural, leisure, tourism but of equal significance spiritual contributions to health and wellbeing which are now also a material planning consideration. Such a policy and future implementation content could assist the Church and Manor House in obtaining future grants for enhancements. A site/location specific policy would be appropriate in the current version of the INP which recognises the great significance of the historic core for all purposes associated with such heritage assets.

Policy INDP 16 Leisure and Tourism:- Propose added wording to the section on Creative Heritage Hub as follows: “the core of which is focussed and historically centred on the former Roman Fort and subsequent Anglo-Saxon settlement now occupied by the two most important historic buildings in the town - the Church and Manor House (as recognised in their listing status as Grade 1 and II* buildings”.

16. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP9

Consultation point:	Policy INDP9: New Development in Middleton Conservation Area		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Delete ‘set out’ after ‘good design’ in the third paragraph			
Full Submission:			
Delete ‘set out’ after ‘good design’ in the third paragraph			

17. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP10

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.

Consultation point:	Policy INDP10: Local Green Spaces		
Representation ID:	29838	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	

Summary:

There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.

We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

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Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

his policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP10: Local Green Spaces		
Representation ID:	29843	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	

Summary:

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature’s recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

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Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

Full Submission:

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We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

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- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

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Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP10: Local Green Spaces		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>Given the importance of Local Green Spaces – the policy would benefit from being reordered – so that the sentence relating to the protection of Local Green Spaces occurs first then followed by the instances where development may be permitted.</p> <p>It is noted that a number of the proposed Local Green Spaces are situated within the Green Belt, thus benefitting from the similar strength protection in planning policy. It queried whether there is a need for this additional designation.</p>			
Full Submission:			
<p>Given the importance of Local Green Spaces – the policy would benefit from being reordered – so that the sentence relating to the protection of Local Green Spaces occurs first then followed by the instances where development may be permitted.</p> <p>It is noted that a number of the proposed Local Green Spaces are situated within the Green Belt, thus benefitting from the similar strength protection in planning policy. It queried whether there is a need for this additional designation:</p> <ul style="list-style-type: none"> • INDP10/2: East Holmes Field & Skateboard Park • INDP10/15: Woodland Trust River Bank. 			

Consultation point:	Policy INDP10: Local Green Spaces (Policy 10/16)		
Representation ID:		Comment Type:	Object
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>Object t to designation as Local Green Space (LGS). It was partially previously allocated for residential development with remaindering being identified as a protected playing field. The site has been considered through the SHLAA process as a potential housing site, and has also been considered through the site selection process for the emerging Local Plan. It was rule on flood risk grounds.</p> <p>The flooding evidence is being reviewed and it may impact on whether the site is carried forward within the Local Plan process.</p> <p>Designation as an LGS would limit any potential future uses of the site. It could still identified as open space.</p>			
Full Submission:			
<p>This site is owned by CBMDC. As the landowner, the council objects to its designation in the Ilkley Neighbourhood Plan as a Local Green Space (LGS).</p>			

The proposed LGS at Ashlands Road (Ref: INDP10/16), was partly allocated within the RUDP (May 2005) for residential development (Ref: K/H1.9) with the remainder being identified as a protected playing field. It has previously been used by the adjacent primary school as a playing field.

The site has been considered through the SHLAA process as a potential housing site (Ref: IL/001). As such it has also been considered as part of the site selection process for the emerging Bradford District Local Plan (2020 to 2038). 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.

As part of developing the evidence base for the Local Plan, the Strategic Flood Risk Assessment (SFRA) is being updated 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.

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.

Designating the site as an LGS in the Ilkley Neighbourhood Development Plan, at this point in time would severely limit any potential future uses of the site.

Depending on the outcome of the Local Plan site assessment process, the site could still be identified as Open Space or Green Infrastructure and/or for future flood alleviation in the Local Plan.

If this took place the site would receive a degree of protection and any proposals on it would be subject to the open space, and other, policies of the Local Plan as well as the neighbourhood plan (when adopted).

18. CHAPTER 5 – INDP POLICES AND PROPOSALS – POLICY INDP11

Consultation point:	Policy INDP11: Green Corridors		
Representation ID:	21751	Comment Type:	Support
Respondent:	6290	Agent:	
Summary:			
In view of the mounting evidence that there has been catastrophic biodiversity loss over the last 60 years or so, it is particularly important to ensure that development respects the need for green corridors.			
Full Submission:			
In view of the mounting evidence that there has been catastrophic biodiversity loss over the last 60 years or so, it is particularly important to ensure that development respects the need for green corridors.			

Consultation point:	Policy INDP11: Green Corridors		
Representation ID:	29844	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			
The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.			
This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature’s recovery. LWS play a critical conservation role by providing wildlife refuges, acting as			

stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

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Full Submission:

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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

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We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP11: Green Corridors		
Representation ID:	29846	Comment Type:	Support
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			
We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.			
Full Submission:			
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work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

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The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP11: Green Corridors		
Representation ID:	29879	Comment Type:	Support
Respondent:	7041	Agent:	
Summary:			
I support preservation and enhancement of the green corridors to help protect wildlife, especially in the context of increasing housing and development in the foreseeable future			
Full Submission:			
I support preservation and enhancement of the green corridors to help protect wildlife, especially in the context of increasing housing and development in the foreseeable future			

Consultation point:	Policy INDP11: Green Corridors (Para 5.49)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Insert 'Wildlife' between 'Bradford' and 'Habitat'			
Full Submission:			
Insert 'Wildlife' between 'Bradford' and 'Habitat'			

Consultation point:	Policy INDP11: Green Corridors (Policy and Para 5.49)		
Representation ID:		Comment Type:	Support
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The reference in paragraph 5.49 to habitat network being augmented at neighbourhood level is welcomed.			

However, it is not clear if any additional has been undertaken as part of preparing the neighbourhood in defining the extent of a local/neighbourhood habitat network. If this is the case, it should be included within the neighbourhood plan and shown on the Policies Map.

Full Submission:

The reference in paragraph 5.49 to habitat network being augmented at neighbourhood level is welcomed. However, it is not clear if any additional has been undertaken as part of preparing the neighbourhood in defining the extent of a local/neighbourhood habitat network. If this is the case, it should be included within the neighbourhood plan and shown on the Policies Map.

19. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP12

Consultation point:	Policy INDP12: Protecting Ilkley's Landscape Character		
Representation ID:	29822	Comment Type:	Comment
Respondent:	Climate Action Ilkley [6537]	Agent:	
Summary:			
<p>This policy INDP 13 (and policy INDP12: Protecting Ilkley’s Landscape Character) make no reference to a Tree Strategy for Ilkley.</p> <p>Bradford Council has a statement headed “Trees and woodland on public land” and lists some of the many benefits that trees provide and its aim to plant the “right trees in the right place”. But the Council seems to have no explicit and holistic strategy for trees in the same way that many other councils do ranging from city councils to small parish ones.</p> <p>I suggest that INDP includes the aim to create a Tree Strategy for Ilkley which is developed and actioned in conjunction with local groups and volunteers. In a modern approach we might expect more emphasis on canopy cover and we would seek help from a local university to quantify this and set targets.</p>			
Full Submission:			
<p>Observation on Policy INDP13: Protecting and Enhancing Biodiversity</p> <p>This policy INDP 13 (and policy INDP12: Protecting Ilkley’s Landscape Character) make no reference to a Tree Strategy for Ilkley.</p> <p>Bradford Council has a statement headed “Trees and woodland on public land” and lists some of the many benefits that trees provide and its aim to plant the “right trees in the right place”. But the Council seems to have no explicit and holistic strategy for trees in the same way that many other councils do ranging from city councils to small parish ones.</p> <p>I suggest that INDP includes the aim to create a Tree Strategy for Ilkley which is developed and actioned in conjunction with local groups and volunteers. In a modern approach we might expect more emphasis on canopy cover and we would seek help from a local university to quantify this and set targets.</p>			

Consultation point:	Policy INDP12: Protecting Ilkley's Landscape Character		
Representation ID:	29839	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			

There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.

We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust’s principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature’s recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

20. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP13

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	21753	Comment Type:	Support
Respondent:	[6290]	Agent:	
Summary:			

I strongly support the attempt to enhance biodiversity in the ways listed - might we add limitations to the mowing of roadside verges and the encouragement of wild flowers there?

Full Submission:

I strongly support the attempt to enhance biodiversity in the ways listed - might we add limitations to the mowing of roadside verges and the encouragement of wild flowers there?

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	29821	Comment Type:	Comment
Respondent:	Climate Action Ilkley [6537]	Agent:	

Summary:

This policy (and policy INDP12: Protecting Ilkley’s Landscape Character) make no reference to a Tree Strategy for Ilkley.

Bradford Council has a statement headed “*Trees and woodland on public land*” and lists some of the many benefits that trees provide and its aim to plant the “*right trees in the right place*”. But the Council seems to have no explicit and holistic strategy for trees in the same way that many other councils do, ranging from city councils to small parish ones.

I suggest that INDP includes the aim to create a Tree Strategy for Ilkley which is developed and actioned in conjunction with local groups and volunteers. In a modern approach we might expect more emphasis on canopy cover and we would seek help from a local university to quantify this and set targets.

Full Submission:

Observation on Policy INDP13: Protecting and Enhancing Biodiversity

This policy (and policy INDP12: Protecting Ilkley’s Landscape Character) make no reference to a Tree Strategy for Ilkley.

Bradford Council has a statement headed “*Trees and woodland on public land*” and lists some of the many benefits that trees provide and its aim to plant the “*right trees in the right place*”. But the Council seems to have no explicit and holistic strategy for trees in the same way that many other councils do, ranging from city councils to small parish ones.

I suggest that INDP includes the aim to create a Tree Strategy for Ilkley which is developed and actioned in conjunction with local groups and volunteers. In a modern approach we might expect more emphasis on canopy cover and we would seek help from a local university to quantify this and set targets.

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	29840	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	

Summary:

There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.

We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible

mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

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- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

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We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help

developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature’s recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	29842	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust) [4640]	Agent:	
Summary:			
We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.			
Full Submission:			
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select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	29845	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			
<p>The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.</p> <p>This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature’s recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.</p> <p>For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.</p> <p>Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.</p>			
Full Submission:			
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The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	29847	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	

Summary:

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

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Full Submission:

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We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	29854	Comment Type:	Comment
Respondent:	Burley Parish Council [146]	Agent:	
Summary:			
<p>New government guidance, that is due to come into force in October 2022, is omitted from this statement. Net gains in biodiversity will then be set at 10%+, a more difficult target to attain. Whilst applications may come forward in the period between now and October 2022, it's important to recognise and be working towards this change, and with good reason. There are currently more than 1.1 million homes that have been given planning permission over the last decade which are still yet to be built. That's the issue here, you can apply to build, receive planning permission, and then delay the build, effectively mitigating the need to conform to new biodiversity targets. I think that biodiversity needs to align with commencement of new builds as opposed to the date a planning application is approved.</p> <p>Also absent is any mention of impacts to the Area of Outstanding Natural Beauty (AONB) adjacent to Ilkley. Whilst not relevant to the INDP, it's relevant to Bradford's HRA.</p>			
Full Submission:			
INDP5 and Policy SC2 "Renewable Energy"			
<p>The INDP supports proposals for individual and community scale renewable and low carbon energy generation that is "community-led" or "meets the needs" of the local community. This includes from solar photovoltaic panels and proposals for standalone renewable energy developments subject to the following criteria:</p> <ul style="list-style-type: none"> • the siting and scale of the proposed development is appropriate to its setting and position in the wider landscape; and • the proposed development does not create an unacceptable impact on the amenities of local residents; and • the proposed development does not have an unacceptable impact on a feature of natural or biodiversity importance". <p>Given that climate-change and net-zero must be achieved by 2050, that Bradford Council has declared a climate emergency and that there is an earlier net-zero carbon date of 2038, should we not be mandating the inclusion of renewable energy with every build? Proposals should not only meet the needs of the local community, but the global community.</p> <p>The pros and cons to acting now are:</p> <p>Cons.</p> <ul style="list-style-type: none"> • Short term cost implications at time of purchase on new builds. • If Council do not address the cost of zero emission/carbon neutral homes up front, we're effectively just kicking the cost further down the line. • Future cost of making homes zero emission/carbon neutral is an issue government is currently trying to address on older housing stock. Many people will not be able to afford the upgrade cost (no economies of scale, complex installation), so work may never be carried out. A good analogy would be the introduction of solar panels. Consider how few homes have migrated to solar to date. • Further government subsidies to encourage take up of zero-carbon measures are a cost burden to the taxpayer. These subsidies could be put to better use elsewhere in the economy. • Carbon output will be maintained until such time that zero carbon upgrades are installed, making it more difficult to achieve defined Carbon targets both locally and nationally. <p>Pros.</p>			

- House builders and developers have the economies of scale to make homes zero emission/carbon neutral far more cheaply than individual homeowners/landlords.
- Zero percent VAT on these technologies at build, another opportunity to save money.
- This technology is far more easily installed before build, ready at point of sale.
- Installation up front will work out cheaper than delayed upgrade.
- Immediate CO2 benefits delivered towards government and local authority aspirations for a zero-carbon economy.
- Mortgage terms of 20 years plus, mean that this cost is spread over the term and is likely to be a minimal monthly charge.
- Immediate energy savings will help to offset the additional purchase and mortgage costs.

INDP13 Protecting and Enhancing Biodiversity - Policy SC8, EN2

including the Local Wildlife Sites identified on the Policies Map, should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity.

Reference should also be made to *“Homes and Neighbourhoods: a Guide to Designing in Bradford”*. This sets out ways that wildlife and green features can be integrated into developments at a variety of levels, (neighbourhoods, streets and individual housing). New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation and provide new opportunities to extend biodiversity.

New government guidance, that is due to come into force in October 2022, is omitted from this statement. Net gains in biodiversity will then be set at 10%+, a more difficult target to attain. Whilst applications may come forward in the period between now and October 2022, it’s important to recognise and be working towards this change, and with good reason. There are currently more than 1.1 million homes that have been given planning permission over the last decade which are still yet to be built. That’s the issue here, you can apply to build, receive planning permission, and then delay the build, effectively mitigating the need to conform to new biodiversity targets. I think that biodiversity needs to align with commencement of new builds as opposed to the date a planning application is approved.

Also absent is any mention of impacts to the Area of Outstanding Natural Beauty (AONB) adjacent to Ilkley. Whilst not relevant to the INDP, it’s relevant to Bradford’s HRA.

INDP14 Traffic and Transport

“To support the development of sustainable multi-modal transport and reduce vehicle emissions development will be expected to show how measures promote active and healthy lifestyles and help make walking, cycling and the use of public transport a first choice for all and reduce the need to travel by private car. In particular, proposals should seek to incorporate sustainable multi-modal transport solutions and infrastructure which focus on emissions reduction (e.g. car parking spaces and charging facilities in accessible, convenient and safe places for plug-in and other ultra-low emission vehicles). The INDP promotes the use of mobility sharing schemes such as car clubs, car sharing and electric bike clubs”.

Should we not also reference rail travel as the most important element of sustainable travel as it’s at the heart of Bradford’s net zero carbon proposals? There are no plans to improve rail travel in the foreseeable future (2028 in the WYCA plan, if station infrastructure across the network can accommodate 6 carriage trains). Road and bus connectivity to Bradford and the Aire Valley employment centres are very poor. Are these too not multi-modal transport solutions capable of moving both goods and people? The Local Plan has already established that *“At peak times these services already run at capacity”* and that *“upgrading should be considered”*.

INDP16 Leisure and Tourism

“Development of existing and new tourism and leisure facilities will be supported where such development 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”.

Leisure and Tourism will undoubtedly affect the areas which the INDP seeks to protect. As this policy in the INPD is driven by Bradford policies EC1 & EC4, should you not include reference to mitigation measures provided by Bradford Council. We note that a warden service is being introduced during working hours, although the Parish Council does not believe that this will completely mitigate the impact of tourism.

Wardens are to be financed from CIL contributions from developments bordering the SPA/SAC, however, there’s a chequered history of CIL payments with many not being paid. Therefore, how are we to ensure that the Warden service will be maintained?

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity		
Representation ID:	29876	Comment Type:	Comment
Respondent:	Redrow Homes [7009]	Agent:	Johnson Mowat [7040]
Summary:			
<p>This draft policy refers to all developments being expected to result in measurable biodiversity net gain. Redrow are committed to the delivery of measurable biodiversity net gain through their housing developments and are confident that the development of Wheatley Lane can deliver ecological enhancements as part of landscaping and building design in accordance with this proposed Policy.</p>			
Full Submission:			
<p>We write on behalf of Redrow in relation to their land interests on land off Wheatley Lane, Ilkley (SHLAA Site Ref IL/013). Johnson Mowat have made a number of representations and submissions to the Council via the Local Plan process in relation to the suitability of this site, including the submission of a Promotional Brochure in July 2016 in response to the Site Allocations DPD Issues and Options consultation, and more recently the completion of a Site Deliverability Request Form in July 2020. The site is not identified in the March 2021 Draft Bradford District Draft Local Plan and submissions were made regarding the suitability of the site and the strong case for the inclusion of the site in the Bradford Local Plan.</p> <p>We welcome the opportunity to respond to the Submission Draft of the Ilkley Neighbourhood Plan and trust that our below comments will be taken into consideration. We request that we continue to be kept informed of the future stages of the Neighbourhood Plan, including the Examination stages, and request that Johnson Mowat continue to be notified.</p> <p>We set out below our comments to individual policies contained in the Submission Draft.</p> <p>Vision and Objectives</p> <p>Redrow welcome the Ilkley 2030 Vision which seeks a vibrant, viable, sustainable and successful town by 2030. Objective 1 “Sustainable Residential Development” is supported as a crucial objective in achieving the Vision to help secure sustainable development. It is considered that land off Wheatley Lane, to the rear of existing development on Wheatley Lane will provide the opportunity of assisting in meeting the Vision and Objective 1. The site is located in a sustainable location, on the edge of Ben Rhydding. It is close to existing services and facilities, with excellent public transport links (bus services and Ben Rhydding Train Station). The development of this site provides an opportunity for creating a scheme to form an important gateway development when entering into Ilkley from the east, and its allocation via the Local Plan will contribute to a robust housing supply in Ilkley, reducing pressure on other sites from speculative development.</p> <p>Policy INDP1 - New housing Development within Ilkley</p>			

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

This is a sensible approach as it allows for the Neighbourhood Plan to align with the future Local Plan.

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

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

Policy INDP3 - Protecting and Enhancing Recreation Facilities

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

Policy INDP5 - Encouraging High Quality and Zero Carbon Design

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

Policy INDP13 - Protecting and Enhancing Biodiversity

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

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity (Para 5.56)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>The Moor adjoins the southern boundary of Ilkley (not the northern).</p> <p>It may be useful to make reference to the forthcoming South Pennine Moors Planning Framework SPD which provides additional details and guidance on the application of Core Strategy SC8 and the impact pathways. It also sets out how contributions to strategic mitigation will be obtained particularly where relevant to recreational impacts on the moors.</p> <p>Following the UK exit from the EU the South Pennine Moors are now protected under the Conservation of Habitats and Species Regulations 2017 (as amended) rather than the European Habitats and Birds Directives.</p>			
Full Submission:			
The Moor adjoins the southern boundary of Ilkley (not the northern).			

It may be useful to make reference to the forthcoming South Pennine Moors Planning Framework SPD which provides additional details and guidance on the application of Core Strategy SC8 and the impact pathways. It also sets out how contributions to strategic mitigation will be obtained particularly where relevant to recreational impacts on the moors.

Following the UK exit from the EU the South Pennine Moors are now protected under the Conservation of Habitats and Species Regulations 2017 (as amended) rather than the European Habitats and Birds Directives.

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity (Para 5.57)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The list of the sites of ecological significance within Wharfedale should include the following sites/assets:			
<ul style="list-style-type: none"> • South Pennine Moors Special Protection Area (SPA) • South Pennine Moors Special Area of Conservation (SAC) • South Pennine Moors Site of Special Scientific Interest (SSSI) • Cow and Calf Rocks Local Geological Site (LGS). • Ben Rhydding Gravel Pits Local Nature Reserve (LNR) • Sun Lane Local Nature Reserve (LNR) 			
Full Submission:			
The list of the sites of ecological significance within Wharfedale should include the following sites/assets:			
<ul style="list-style-type: none"> • South Pennine Moors Special Protection Area (SPA) • South Pennine Moors Special Area of Conservation (SAC) • South Pennine Moors Site of Special Scientific Interest (SSSI) • Cow and Calf Rocks Local Geological Site (LGS). • Ben Rhydding Gravel Pits Local Nature Reserve (LNR) • Sun Lane Local Nature Reserve (LNR) 			

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity (Figure 12)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
A key should be provided alongside the map to aid interpretation.			
Full Submission:			
A key should be provided alongside the map to aid interpretation.			

Consultation point:	Policy INDP13: Protecting and Enhancing Biodiversity (Para 5.57)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			

Inclusion of this policy is welcomed and it support Bradford Core Strategy policies SC8 and EN2. It also includes requirements for biodiversity net gain within development. Reflects the NPPF and requirements in the draft Environment Bill.

Full Submission:

The inclusion of this policy is welcomed and it supports Bradford Core Strategy polices SC8 and EN2. It is noted that the policy includes a requirement that new development “*should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity*” and “*All developments are expected to result in measurable biodiversity net gain.*” This reflects National Planning Policy Framework (NPPF) and biodiversity net-gain is included as a mandatory requirement in the draft Environment Bill which is currently before Parliament.

21. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP14

Consultation point:	Policy INDP14: Traffic and Transport		
Representation ID:	21762	Comment Type:	Comment
Respondent:	6290	Agent:	
Summary:			
We need to lessen our reliance on private cars. Many of us use them regularly for journeys that could easily be taken in other ways. Because we are all lazy (I include myself!), Councils should do all they can to alter incentive structures surrounding travel choices by making active travel safe and pleasant and ensuring it is more difficult for people to park centrally for the whole day in Ilkley.			
Full Submission:			
We need to lessen our reliance on private cars. Many of us use them regularly for journeys that could easily be taken in other ways. Because we are all lazy (I include myself!), Councils should do all they can to alter incentive structures surrounding travel choices by making active travel safe and pleasant and ensuring it is more difficult for people to park centrally for the whole day in Ilkley.			

Consultation point:	Policy INDP14: Traffic and Transport		
Representation ID:	29855	Comment Type:	Comment
Respondent:	Burley Parish Council [146]	Agent:	
Summary:			
Should we not also reference rail travel as the most important element of sustainable travel as it’s at the heart of Bradford’s net zero carbon proposals? There are no plans to improve rail travel in the foreseeable future (2028 in the WYCA plan, if station infrastructure across the network can accommodate 6 carriage trains). Road and bus connectivity to Bradford and the Aire Valley employment centres are very poor. Are these too not multi-modal transport solutions capable of moving both goods and people? The Local Plan has already established that “At peak times these services already run at capacity” and that “upgrading should be considered”.			
Full Submission:			
INDP5 and Policy SC2 – “Renewable Energy”			

The INDP supports proposals for individual and community scale renewable and low carbon energy generation that is “community-led” or “meets the needs” of the local community. This includes from solar photovoltaic panels and proposals for standalone renewable energy developments subject to the following criteria:

- the siting and scale of the proposed development is appropriate to its setting and position in the wider landscape; and
- the proposed development does not create an unacceptable impact on the amenities of local residents; and
- the proposed development does not have an unacceptable impact on a feature of natural or biodiversity importance.

Given that climate-change and net-zero must be achieved by 2050, that Bradford Council has declared a climate emergency and that there is an earlier net-zero carbon date of 2038, should we not be mandating the inclusion of renewable energy with every build? Proposals should not only meet the needs of the local community, but the global community.

The pros and cons to acting now are:

Cons.

- Short term cost implications at time of purchase on new builds.
- If Council do not address the cost of zero emission/carbon neutral homes up front, we’re effectively just kicking the cost further down the line.
- Future cost of making homes zero emission/carbon neutral is an issue government is currently trying to address on older housing stock. Many people will not be able to afford the upgrade cost (no economies of scale, complex installation), so work may never be carried out. A good analogy would be the introduction of solar panels. Consider how few homes have migrated to solar to date.
- Further government subsidies to encourage take up of zero-carbon measures are a cost burden to the taxpayer. These subsidies could be put to better use elsewhere in the economy.
- Carbon output will be maintained until such time that zero carbon upgrades are installed, making it more difficult to achieve defined Carbon targets both locally and nationally.

Pros.

- House builders and developers have the economies of scale to make homes zero emission/carbon neutral far more cheaply than individual homeowners/landlords.
- Zero percent VAT on these technologies at build, another opportunity to save money.
- This technology is far more easily installed before build, ready at point of sale.
- Installation up front will work out cheaper than delayed upgrade.
- Immediate CO2 benefits delivered towards government and local authority aspirations for a zero-carbon economy.
- Mortgage terms of 20 years plus, mean that this cost is spread over the term and is likely to be a minimal monthly charge.
- Immediate energy savings will help to offset the additional purchase and mortgage costs.

INDP13 Protecting and Enhancing Biodiversity - Policy SC8, EN2

“including the Local Wildlife Sites identified on the Policies Map, should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity.

Reference should also be made to “Homes and Neighbourhoods: a Guide to Designing in Bradford”. This sets out ways that wildlife and green features can be integrated into developments at a variety of levels, (neighbourhoods, streets and individual housing). New developments should identify and protect existing

habitats on individual sites, and seek opportunities to reverse habitat fragmentation and provide new opportunities to extend biodiversity.

New government guidance, that is due to come into force in October 2022, is omitted from this statement. Net gains in biodiversity will then be set at 10%+, a more difficult target to attain. Whilst applications may come forward in the period between now and October 2022, it's important to recognise and be working towards this change, and with good reason. There are currently more than 1.1 million homes that have been given planning permission over the last decade which are still yet to be built. That's the issue here, you can apply to build, receive planning permission, and then delay the build, effectively mitigating the need to conform to new biodiversity targets. I think that biodiversity needs to align with commencement of new builds as opposed to the date a planning application is approved.

Also absent is any mention of impacts to the Area of Outstanding Natural Beauty (AONB) adjacent to Ilkley. Whilst not relevant to the INDP, it's relevant to Bradford's HRA.

INDP14 Traffic and Transport

“To support the development of sustainable multi-modal transport and reduce vehicle emissions development will be expected to show how measures promote active and healthy lifestyles and help make walking, cycling and the use of public transport a first choice for all and reduce the need to travel by private car. In particular, proposals should seek to incorporate sustainable multi-modal transport solutions and infrastructure which focus on emissions reduction (e.g. car parking spaces and charging facilities in accessible, convenient and safe places for plug-in and other ultra-low emission vehicles). The INDP promotes the use of mobility sharing schemes such as car clubs, car sharing and electric bike clubs”.

Should we not also reference rail travel as the most important element of sustainable travel as it's at the heart of Bradford's net zero carbon proposals? There are no plans to improve rail travel in the foreseeable future (2028 in the WYCA plan, if station infrastructure across the network can accommodate 6 carriage trains). Road and bus connectivity to Bradford and the Aire Valley employment centres are very poor. Are these too not multi-modal transport solutions capable of moving both goods and people? The Local Plan has already established that *“At peak times these services already run at capacity”* and that *“upgrading should be considered”*.

INDP16 Leisure and Tourism

“Development of existing and new tourism and leisure facilities will be supported where such development 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”.

Leisure and Tourism will undoubtedly affect the areas which the INDP seeks to protect. As this policy in the INPD is driven by Bradford policies EC1 & EC4, should you not include reference to mitigation measures provided by Bradford Council. We note that a warden service is being introduced during working hours, although the Parish Council does not believe that this will completely mitigate the impact of tourism.

Wardens are to be financed from CIL contributions from developments bordering the SPA/SAC, however, there's a chequered history of CIL payments with many not being paid. Therefore, how are we to ensure that the Warden service will be maintained?

Consultation point:	Policy INDP14: Traffic and Transport		
Representation ID:	29880	Comment Type:	Comment
Respondent:	7041	Agent:	
Summary:			
I fully support proposals for enhancing measures to improve cycling opportunities. I am keen for children to cycle but concerned about safety on Ilkley's roads. Cycle lanes? Close The Grove to cars?			

<p>All measures welcomed</p> <p>Electric bike clubs sounds like a brilliant idea.</p> <p>Also increasing provision of electric charging hubs - will be essential to meet demand over next 20 years</p> <p>Support measures to promote public transport, in the town and linking in to other communities. e..g can't get a convenient bus to Airedale Hospital at present.</p>
<p>Full Submission:</p>
<p>I fully support proposals for enhancing measures to improve cycling opportunities. I am keen for children to cycle but concerned about safety on Ilkley's roads. Cycle lanes? Close The Grove to cars? All measures welcomed</p> <p>Electric bike clubs sounds like a brilliant idea.</p> <p>Also increasing provision of electric charging hubs - will be essential to meet demand over next 20 years</p> <p>Support measures to promote public transport, in the town and linking in to other communities. e..g can't get a convenient bus to Airedale Hospital at present.</p>

Consultation point:	Policy INDP14: Traffic and Transport		
Representation ID:	29883	Comment Type:	Comment
Respondent:	7041	Agent:	
Summary:			
<p>Additional comment in regard to improving facilities for cycling - we need more places for bicycle parking please. The east end of Grove road would be useful e.g near the Memorial Garden, for use by residents on west side of town cycling in to use The Grove shops and facilities. Also more points on Bridge street</p>			
Full Submission:			
<p>Additional comment in regard to improving facilities for cycling - we need more places for bicycle parking please. The east end of Grove road would be useful e.g near the Memorial Garden, for use by residents on west side of town cycling in to use The Grove shops and facilities. Also more points on Bridge street</p>			

Consultation point:	Policy INDP14: Traffic and Transport		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>The elements of the policy which places emphasis on sustainable transport measures and vehicle charging are supported.</p> <p>The plan should make more explicit what is meant by 'multi-modal transport assets' as this could be misunderstood. For example, does this mean public transport services as well as cycling and walking</p>			
Full Submission:			
<p>The elements of the policy which places emphasis on sustainable transport measures and vehicle charging are supported.</p> <p>The plan should make more explicit what is meant by 'multi-modal transport assets' as this could be misunderstood. For example, does this mean public transport services as well as cycling and walking</p>			

Consultation point:	Policy INDP14: Traffic and Transport (Para 5.63)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The plan should make more explicit what is meant by ‘multi-modal transport assets’ as this could be misunderstood. For example, does this mean public transport services as well as cycling and walking.			
Full Submission:			
The plan should make more explicit what is meant by ‘multi-modal transport assets’ as this could be misunderstood. For example, does this mean public transport services as well as cycling and walking.			

Consultation point:	Policy INDP14: Traffic and Transport (Para 5.64)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The plan should include an explanation of outlining the problem with the level of car parking provision. Is it too much or too little, or is it not of the right standard?			
Full Submission:			
The plan should include an explanation of outlining the problem with the level of car parking provision. Is it too much or too little, or is it not of the right standard?			

22. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP15

Consultation point:	Policy INDP15: Walking and Cycling		
Representation ID:	29841	Comment Type:	Comment
Respondent:	Yorkshire Wildlife Trust [4640]	Agent:	
Summary:			
<p>There are some aspects, with regards to biodiversity, which are missing within the plan, or considerations which could make it stronger.</p> <p>We would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.</p> <p>Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space. 			

- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Full Submission:

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

We feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core - Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife - to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water - a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing - to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with INDP10, INDP11 and INCP13 being the only consideration of conservation.

This policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset,

essential to nature’s recover. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites, improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature’s recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country’s remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within Policy INDP11, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a minimum of 10% biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

Consultation point:	Policy INDP15: Walking and Cycling		
Representation ID:	29881	Comment Type:	Support
Respondent:	7041	Agent:	
Summary:			
I also support the Wharfedale Greenway proposals, and the introduction of wider 20 mph zones and/ or other traffic calming measures. Cars go too fast on Beverley Rise, Grove Road and Kings Road. I have on several occasions felt seriously concerned about my toddler's safety whilst we are walking along these streets, and certain cars, often vans, really accelerating past us with no care for pedestrians. The excessive speed also contributes to air pollution.			
Full Submission:			
I also support the Wharfedale Greenway proposals, and the introduction of wider 20 mph zones and/ or other traffic calming measures. Cars go too fast on Beverley Rise, Grove Road and Kings Road. I have on several occasions felt seriously concerned about my toddler's safety whilst we are walking along these streets, and certain cars, often vans, really accelerating past us with no care for pedestrians. The excessive speed also contributes to air pollution.			

Consultation point:	Policy INDP15: Walking and Cycling/Policy INDP16: Leisure and Tourism		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	

Summary:
<p>Policies INDP 15 and INDP 16 are considered to be broadly fine.</p> <p>It is noted that a previous comment from July 2019 requesting an amendment to policy INDP 15 in section a) from ...footpath and cycle path network..... to '<i>footpath, bridleway and cycle path network</i>' has been taken on board.</p> <p>It is considered that the same amendment should be made to the final sentence of the policy so that it reads '<i>the loss of existing footpaths, bridleways and cycle paths will be resisted</i>'.</p> <p>It is appreciated that 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 however the suggested amendment would help ensure the policy takes account of bridleways and the needs of horse riders as both vulnerable road users and a leisure activity undertaken in the area.</p>
Full Submission:
<p>Policies INDP 15 and INDP 16 are considered to be broadly fine.</p> <p>It is noted that a previous comment from July 2019 requesting an amendment to policy INDP 15 in section a) from ...footpath and cycle path network..... to '<i>footpath, bridleway and cycle path network</i>' has been taken on board.</p> <p>It is considered that the same amendment should be made to the final sentence of the policy so that it reads '<i>the loss of existing footpaths, bridleways and cycle paths will be resisted</i>'.</p> <p>It is appreciated that 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 however the suggested amendment would help ensure the policy takes account of bridleways and the needs of horse riders as both vulnerable road users and a leisure activity undertaken in the area.</p>

Consultation point:	Policy INDP15: Walking and Cycling		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
The emphasis placed on ensure that new developments are accessible by walking and cycling is supported.			
Full Submission:			
The emphasis placed on ensure that new developments are accessible by walking and cycling is supported.			

23. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP16

Consultation point:	Policy INDP16: Leisure and Tourism		
Representation ID:	29831	Comment Type:	Comment
Respondent:	Ilkley Manor House Trust [7031]	Agent:	
Summary:			
Ilkley Manor House Trust is committed to supporting Bradford MDC and Ilkley Town Council in delivering against policies INDP2 and INDP16 in particular, playing our part in developing tourism and leisure facilities. Our vision			

is to work in partnership to nurture a creative/heritage hub focused on the Manor House, The Castle Collective, Riverside Gardens, All Saints and with improved connectivity to other cultural assets, including the Playhouse and Cinema.

This could be supported by sustainable public realm enhancements that encourage pedestrian movement and connectivity most notably around the A65 New Brook Street junction, but also connecting the Playhouse to the Manor House and Park via sustainable urban design.

We would like to suggest a minor amendment to the text in the Plan to include All Saints Church in the description of the creative heritage hub so that it reads: “..creative/heritage hub focused on the Manor House, All Saints Church, the Castle Collective, Riverside Gardens”.

Full Submission:

I am writing on behalf the Ilkley Manor House Trust board of trustees to express our support for the proposed Ilkley Neighbourhood Development Plan (INDP).

We commend the work undertaken by the Ilkley Neighbourhood Development Plan Working Group led at different stages by Town Councillors Brian Mann and Ros Brown with the help of Kirkwells.

As one of the groups affected by this Plan, and thanks to the consultation led by the Town Council, we have been engaged fully and feel confident that the INDP has the potential to address the needs and serve the aspirations of our local community.

Ilkley Manor House Trust is committed to supporting Bradford MDC and Ilkley Town Council in delivering against policies INDP2 and INDP16 in particular, playing our part in developing tourism and leisure facilities. Our vision is to work in partnership to nurture a creative/heritage hub focused on the Manor House, The Castle Collective, Riverside Gardens, All Saints and with improved connectivity to other cultural assets, including the Playhouse and Cinema.

This could be supported by sustainable public realm enhancements that encourage pedestrian movement and connectivity most notably around the A65 New Brook Street junction, but also connecting the Playhouse to the Manor House and Park via sustainable urban design.

We would like to suggest a minor amendment to the text in the Plan to include All Saints Church in the description of the creative heritage hub so that it reads: “..creative/heritage hub focused on the Manor House, All Saints Church, the Castle Collective, Riverside Gardens”.

We embrace the principle of NDPs which are part of the development plan and carry “statutory weight” when planning decisions are made. We also welcome the fact that NDPs give local people the final say on the plan for the area through a referendum.

Finally, we note that NDPs can bring a financial benefit to an area and that CBMDC have introduced a levy on future development called the Community Infrastructure Levy (CIL). We are pleased to read that if Ilkley has a finalised INDP the town will receive 25% of any CIL collected in the area. We hope that Ilkley Manor House will be considered for contributions in the event of CIL allocations in future.

We hope that if this plan is adopted, we can all use it to support the future development of Ilkley to best serve the needs of current and future generations.

Consultation point:	Policy INDP16: Leisure and Tourism		
Representation ID:	29852	Comment Type:	Comment
Respondent:	All Saints Parish Church (PCC) [7037]	Agent:	Clive Brook Planning [536]
Summary:			

Policy INDP 16 Leisure and Tourism:- Propose added wording to the section on Creative Heritage Hub- as follows “...the core of which is focussed and historically centred on the former Roman Fort and subsequent Anglo-Saxon settlement now occupied by the two most important historic buildings in the town - the Church and Manor House (as recognised in their listing status as Grade 1 and II* buildings”.

Full Submission:

I set out below our response to the pre-adoption consultation on the Ilkley Neighbourhood Plan. This has been prepared in co-operation with our neighbours the Manor House Trust (MHT). We liaise closely with the Trust on a number of matters relating to heritage interpretation, the use of our respective buildings and land ownerships and provision of public access to the buildings for a variety of community uses. While the principal focus of the Church is on Christian worship and outreach into the wider community we are also making our buildings available for a wide range of community uses with a renewed programme being progressed following the long period of closure due to the Covid pandemic. An example is the Ilkley Literature Festival when we will host several events. The Ilkley Food Bank are a tenant in the ground floor of Church House. The Church dates back to the seventh century and contains strong physical evidence of an earlier Anglo Saxon Church and also houses a number of significant heritage assets. As part of the recent comprehensive renovation of our buildings we have incorporated high quality heritage interpretation material and specialist lighting with financial assistance from the HLF.

The above context will we trust help to explain our specific comments on the INP which are as follows:-

Apart from a brief listing of the Church/Link Building/Church House under policy INDP2 as a community facility to be protected and enhanced there is no further reference to the considerable heritage significance of these buildings in association with the Manor House.

In submitting these comments we recognise that the current plan going forward for adoption, while it is based on local knowledge and expertise, in its present form is only able to deal with preferred policies and their background justification. A subsequent version of the Plan will have very significant added content on several key issues for the town including specific residential and employment developments and actions related to climate change and environmental enhancements. There is scope in future for specific enhancement plans for the major heritage hub comprising the Church, Link, Church House and Manor house and it is necessary to distinguish this and its great historical significance from the wider cultural connections listed including the Playhouse etc.

Policy INDP2 does list the Church/Link/ Church House. The policy background states that planning only deals with land use matters and the physical aspects of buildings. This is not the case as sustainable development now includes social considerations including health and wellbeing of communities so that the uses of buildings and the services they provide can be and often are a material planning consideration. The wording should be revised to reflect the wider significance and uses of important community buildings.

Policy INDP8 Ilkley Conservation Area: We welcome the inclusion of the Roman Fort and Historic Centre and the proposed content on enhancing the setting. Reference should be made to the historic core made up of Church and Manor House as a heritage asset of at least city- region to regional significance. This is an important statement in many respects- cultural, leisure, tourism but of equal significance spiritual contributions to health and wellbeing which are now also a material planning consideration. Such a policy and future implementation content could assist the Church and Manor House in obtaining future grants for enhancements. A site/location specific policy would be appropriate in the current version of the INP which recognises the great significance of the historic core for all purposes associated with such heritage assets.

Policy INDP 16 Leisure and Tourism:- Propose added wording to the section on Creative Heritage Hub- as follows: “...the core of which is focussed and historically centred on the former Roman Fort and subsequent Anglo-Saxon settlement now occupied by the two most important historic buildings in the town -the Church and Manor House (as recognised in their listing status as Grade 1 and II* buildings”.

Consultation point:	Policy INDP16: Leisure and Tourism		
Representation ID:	29856	Comment Type:	Comment
Respondent:	Burley Parish Council [146]	Agent:	
Summary:			
<p>Leisure and Tourism will undoubtedly affect the areas which the INDP seeks to protect. As this policy in the INPD is driven by Bradford policies EC1 & EC4, should you not include reference to mitigation measures provided by Bradford Council. We note that a warden service is being introduced during working hours, although the Parish Council does not believe that this will completely mitigate the impact of tourism.</p> <p>Wardens are to be financed from CIL contributions from developments bordering the SPA/SAC, however, there's a chequered history of CIL payments with many not being paid. Therefore, how are we to ensure that the Warden service will be maintained?</p>			
Full Submission:			
<p>NDP5 and Policy SC2 – “Renewable Energy”</p> <p>The INDP supports proposals for individual and community scale renewable and low carbon energy generation that is “community-led” or “meets the needs” of the local community. This includes from solar photovoltaic panels and proposals for standalone renewable energy developments subject to the following criteria:</p> <ul style="list-style-type: none"> • the siting and scale of the proposed development is appropriate to its setting and position in the wider landscape; and • the proposed development does not create an unacceptable impact on the amenities of local residents; and • the proposed development does not have an unacceptable impact on a feature of natural or biodiversity importance. <p>Given that climate-change and net-zero must be achieved by 2050, that Bradford Council has declared a climate emergency and that there is an earlier net-zero carbon date of 2038, should we not be mandating the inclusion of renewable energy with every build? Proposals should not only meet the needs of the local community, but the global community.</p> <p>The pros and cons to acting now are:</p> <p>Cons.</p> <ul style="list-style-type: none"> • Short term cost implications at time of purchase on new builds. • If Council do not address the cost of zero emission/carbon neutral homes up front, we're effectively just kicking the cost further down the line. • Future cost of making homes zero emission/carbon neutral is an issue government is currently trying to address on older housing stock. Many people will not be able to afford the upgrade cost (no economies of scale, complex installation), so work may never be carried out. A good analogy would be the introduction of solar panels. Consider how few homes have migrated to solar to date. • Further government subsidies to encourage take up of zero-carbon measures are a cost burden to the taxpayer. These subsidies could be put to better use elsewhere in the economy. • Carbon output will be maintained until such time that zero carbon upgrades are installed, making it more difficult to achieve defined Carbon targets both locally and nationally. <p>Pros.</p> <ul style="list-style-type: none"> • House builders and developers have the economies of scale to make homes zero emission/carbon neutral far more cheaply than individual homeowners/landlords. 			

- Zero percent VAT on these technologies at build, another opportunity to save money.
- This technology is far more easily installed before build, ready at point of sale.
- Installation up front will work out cheaper than delayed upgrade.
- Immediate CO2 benefits delivered towards government and local authority aspirations for a zero-carbon economy.
- Mortgage terms of 20 years plus, mean that this cost is spread over the term and is likely to be a minimal monthly charge.
- Immediate energy savings will help to offset the additional purchase and mortgage costs.

INDP13 Protecting and Enhancing Biodiversity - Policy SC8, EN2

“including the Local Wildlife Sites identified on the Policies Map, should demonstrate how biodiversity will be protected and enhanced by securing a net gain in biodiversity.

Reference should also be made to “Homes and Neighbourhoods: a Guide to Designing in Bradford”. This sets out ways that wildlife and green features can be integrated into developments at a variety of levels, (neighbourhoods, streets and individual housing). New developments should identify and protect existing habitats on individual sites, and seek opportunities to reverse habitat fragmentation and provide new opportunities to extend biodiversity.

New government guidance, that is due to come into force in October 2022, is omitted from this statement. Net gains in biodiversity will then be set at 10%+, a more difficult target to attain. Whilst applications may come forward in the period between now and October 2022, it’s important to recognise and be working towards this change, and with good reason. There are currently more than 1.1 million homes that have been given planning permission over the last decade which are still yet to be built. That’s the issue here, you can apply to build, receive planning permission, and then delay the build, effectively mitigating the need to conform to new biodiversity targets. I think that biodiversity needs to align with commencement of new builds as opposed to the date a planning application is approved.

Also absent is any mention of impacts to the Area of Outstanding Natural Beauty (AONB) adjacent to Ilkley. Whilst not relevant to the INDP, it’s relevant to Bradford’s HRA.

INDP14 Traffic and Transport

“To support the development of sustainable multi-modal transport and reduce vehicle emissions development will be expected to show how measures promote active and healthy lifestyles and help make walking, cycling and the use of public transport a first choice for all and reduce the need to travel by private car. In particular, proposals should seek to incorporate sustainable multi-modal transport solutions and infrastructure which focus on emissions reduction (e.g. car parking spaces and charging facilities in accessible, convenient and safe places for plug-in and other ultra-low emission vehicles). The INDP promotes the use of mobility sharing schemes such as car clubs, car sharing and electric bike clubs”.

Should we not also reference rail travel as the most important element of sustainable travel as it’s at the heart of Bradford’s net zero carbon proposals? There are no plans to improve rail travel in the foreseeable future (2028 in the WYCA plan, if station infrastructure across the network can accommodate 6 carriage trains). Road and bus connectivity to Bradford and the Aire Valley employment centres are very poor. Are these too not multi-modal transport solutions capable of moving both goods and people? The Local Plan has already established that “At peak times these services already run at capacity” and that “upgrading should be considered”.

INDP16 Leisure and Tourism

“Development of existing and new tourism and leisure facilities will be supported where such development 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”.

Leisure and Tourism will undoubtedly affect the areas which the INDP seeks to protect. As this policy in the INPD is driven by Bradford policies EC1 & EC4, should you not include reference to mitigation measures provided by Bradford Council. We note that a warden service is being introduced during working hours, although the Parish Council does not believe that this will completely mitigate the impact of tourism.

Wardens are to be financed from CIL contributions from developments bordering the SPA/SAC, however, there's a chequered history of CIL payments with many not being paid. Therefore, how are we to ensure that the Warden service will be maintained?

Consultation point:	Policy INDP16: Leisure and Tourism		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
First paragraph should be reworded to clarify when new leisure and tourism facilities will be supported. May be appropriate to add a spatial dimension to the policy.			
Full Submission:			
It is considered that the first paragraph should reworded to clarify when new leisure and tourism facilities will be supported. It may be more appropriate to use bullet points to do so. The point relating to development in the Green Belt being appropriate where it is in line with national policy is confusing and should be reworded. It may also be appropriate to add a spatial dimension to the policy in terms of supporting existing/new tourism facilities within the town as well as the wider neighbourhood area.			

24. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP20

Consultation point:	Policy INDP20: Economy and Employment		
Representation ID:	29823	Comment Type:	Comment
Respondent:	Clive Brook Planning [536]	Agent:	
Summary:			
The INDP should include either a sub policy to INDP 20 Economy and Employment, or a separate new policy, to require the provision of a new employment site in the form of a business park to meet the requirement in Wharfedale for a circa 5 hectares employment site. It is wholly appropriate that this provision should be made in or adjacent to the Principal Town given the policy content of the adopted CS and the emerging draft Local Plan. While a specific allocation cannot be made in the INDP until the appropriate stage has been reached on the adoption of the Local Plan the policy principle should be established at community level now. There is significant latent demand for such new employment space and it is important to realise the economic development strengths of Ilkley. I have previously made submissions to the draft Local Plan process advocating the location of a new business park to the east of Ilkley on Council owned land but have received no previous acknowledgment of my submissions.			
Full Submission:			
I refer to your e-mail sent yesterday and would like to make the following formal comments on the submitted draft.			

The INDP should include either a sub policy to INDP 20 Economy and Employment, or a separate new policy, to require the provision of a new employment site in the form of a business park to meet the requirement in Wharfedale for a circa 5 hectares employment site. It is wholly appropriate that this provision should be made in or adjacent to the Principal Town given the policy content of the adopted CS and the emerging draft Local Plan. While a specific allocation cannot be made in the INDP until the appropriate stage has been reached on the adoption of the Local Plan the policy principle should be established at community level now. There is significant latent demand for such new employment space and it is important to realise the economic development strengths of Ilkley. I have previously made submissions to the draft Local Plan process advocating the location of a new business park to the east of Ilkley on Council owned land but have received no previous acknowledgment of my submissions.

A policy on Climate Change should be added to the INDP as advocated by the RTP1 and the Committee on Climate Change and given the Government’s emphasis on neighbourhood planning and the need to include actions to mitigate and adapt to these changes at the community level.

Consultation point:	Policy INDP20: Economy and Employment		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>Policy as drafted is considered to be inflexible as it does not set out those circumstances under which the change of use/loss of any of the sites/premises listed will be permitted.</p> <p>Recent changes to permitted development rights allowing sites/premises within Use Class E to change to other uses should be borne in mind.</p> <p>Would be useful to set out it contributes to meeting Policies EC1 to EC3</p> <p>Should include reference to uses falling with Use Classes B2 and B8</p>			
Full Submission:			
<p>The policy seeks to protect existing sites/premises that are used for employment purposes in order to support the local economy and maintain a balance between homes and local jobs.</p> <p>However, as drafted it is considered to be inflexible as it does set out those circumstances under which the change of use/loss of any of the sites/premises listed will be permitted. Core Strategy policy EC4 provides some context for this (see the example from the recently made Steeton with Eastburn and Silsden Neighbourhood Plan).</p> <p>In addition, the recent changes to permitted development rights allowing sites/premises falling within Use Class E to being change to other uses including C3 residential should be borne in mind as part of the wider context for the policy.</p> <p>In addition, it would be useful if the supporting text set out this policy would contribute towards meeting Core Strategy policies EC1 to EC3.</p> <p>The inclusion of Use Class E(g) i) office ii) the research and development of products or processes or iii) any industrial process, (which can be carried out in any residential area without causing detriment to the amenity of the area) only within the policy is queried as Use classes B2 and B8 still remain in use. It would be helpful to understand which (if any) of the sites/premises listed in the policy fall within these use classes. If so, the first paragraph of the policy wording should be amended to read <i>“The following existing employment area, falling within Use Classes B2, B8 and E(g) will be protected for employment uses...”</i></p>			

25. CHAPTER 5 – INDP POLICIES AND PROPOSALS – SUPPORTING ACTIONS – TOWN CENTRE AND CAR PARKING

Consultation point:	Supporting Actions – Town Centre and Car Parking		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>Context and reasons for inclusion of the supporting actions is not clear. Para 5.81 should be moved as it provides some context.</p> <p>Additional text should be included provide background to how the actions will be taken forward. Should also be clear that the actions are not a planning policy.</p> <p>Consideration should be given to move the actions are more appropriate section of the document.</p>			
Full Submission:			
<p>The inclusion of the supporting actions relating to the town centre traffic and car parking issues is noted, however as drafted the plan the context for them and the reasoning of their inclusion is not clear. Paragraph 5.81 appears to provides some degree of context and as such should be moved to before the box outlining the supporting actions. Any reference to Policy INDP20 should be removed from this paragraph.</p> <p>However, it is considered that additional text should be included within the plan providing background to the supporting action and how the Town Council intends take them forward. Also it should be made clear in the supporting text that they are not planning policy and will not be used in making decisions on planning applications.</p> <p>Consideration should be given to locating them in a more appropriate section of the document or including a separate section between chapters 5 and 6.</p>			

26. CHAPTER 5 – INDP POLICIES AND PROPOSALS – POLICY INDP21

Consultation point:	Policy INDP21: Meeting the Needs of All		
Representation ID:	29884	Comment Type:	Support
Respondent:	7041	Agent:	
Summary:			
<p>Ilkley play park is really out of date now and could do with a wider range of play equipment to suit older and younger children</p>			
Full Submission:			
<p>Ilkley play park is really out of date now and could do with a wider range of play equipment to suit older and younger children</p>			

Consultation point:	Policy INDP21: Meeting the Needs of All (Policy and Para 5.85)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	

Summary:
The policy, as drafted, partly repeats the first paragraph of Policy INDP17. Accordingly, the first paragraph should be deleted. In addition, the supporting text makes reference to infrastructure provision to support growth outlined in the adopted Core Strategy (2017). Reference should be included the provision of infrastructure within the policy linked to the relevant policies of the adopted Core Strategy, and within the supporting text setting out it may be funded/obtained.
Full Submission:
The policy, as drafted, partly repeats the first paragraph of Policy INDP17. Accordingly, the first paragraph should be deleted. In addition, the supporting text makes reference to infrastructure provision to support growth outlined in the adopted Core Strategy (2017). Reference should be included the provision of infrastructure within the policy linked to the relevant policies of the adopted Core Strategy, and within the supporting text setting out it may be funded/obtained.

Consultation point:	Policy INDP21: Meeting the Needs of All		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
Part f) of the policy includes a significant amount of background information regarding the type of space/feature that could support healthy and active lifestyles. It is considered that part f) should be reworded as follows for clarity: <i>"f) Include spaces or features that support healthy and active lifestyles"</i>			
Full Submission:			
Part f) of the policy includes a significant amount of background information regarding the type of space/feature that could support healthy and active lifestyles. It is considered that part f) should be reworded as follows for clarity: <i>"f) Include spaces or features that support healthy and active lifestyles"</i>			

Consultation point:	Policy INDP21: Meeting the Needs of All (Para 5.84)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
This paragraphs refers to the plan being subject to an Equalities Impact Assessment. This has not been provided. Should reference be made instead to the Basic Conditions statement?			
Full Submission:			
This paragraphs refers to the plan being subject to an Equalities Impact Assessment. This has not been provided. Should reference be made instead to the Basic Conditions statement?			

27. CHAPTER 6 – MONITORING AND REVIEW

Consultation point:	6 – Monitoring and Review (Paras 6.1 To 6.3)		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
It is queried whether the plan should include further detail on the how Town Council intends to monitoring the policies and proposals in the plan on annual basis. Will this involve some form of Annual Monitoring Report? If so, what targets/indicators will be used.			
Full Submission:			
It is queried whether the plan should include further detail on the how Town Council intends to monitoring the policies and proposals in the plan on annual basis. Will this involve some form of Annual Monitoring Report? If so, what targets/indicators will be used.			

28. GLOSSARY

Consultation point:	Glossary		
Representation ID:	29992	Comment Type:	Comment
Respondent:	Historic England [101]	Agent:	
Summary:			
Heritage Assets are defined within the Glossary, but the document does not specifically identify them. Where policies relate to non-designated heritage assets, the absence of a schedule or map identifying them could lead to unnecessary disputes, or misunderstandings.			
Recommendation:			
Incorporate a map and schedule of non-designated heritage assets (based upon the guidance set out in Historic England s Local Heritage Listing) into the document and include policies specifically relating to them, whether within or outside the conservation areas.			
Full Submission:			
Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan. We are responding to the request in your e-mail of 14th September 2021.			
We have highlighted the fact that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012. We are therefore providing comments on the understanding that the Submission Draft may need to be amended, and if this is the case, a further consultation may be required.			

Consultation point:	Glossary		
Representation ID:	29993	Comment Type:	Comment
Respondent:	Historic England [101]	Agent:	
Summary:			

Scheduled Monuments (SM s) are mentioned in the glossary entry for Designated Heritage Assets , but not referred to anywhere else in the document, although there are 70 SM s within the Neighbourhood Plan boundary.

Recommendation:

- Include a definition of a Scheduled Monument within the Glossary.
- Incorporate appropriate policies, a map and schedule of Scheduled Monuments within the Neighbourhood Plan area, and/or include a hyper link to Historic England Listing web page, highlighting Scheduled Monuments in Ilkley.

Full Submission:

Thank you for consulting Historic England on the Submission Draft of the Ilkley Neighbourhood Plan. We are responding to the request in your e-mail of 14th September 2021.

We have highlighted the fact that none of the Statutory Consultees (Natural England, the Environment Agency and Historic England) were consulted at Regulation14, Pre-submission stage, as per the Neighbourhood Planning (General) Regulations 2012. We are therefore providing comments on the understanding that the Submission Draft may need to be amended, and if this is the case, a further consultation may be required.

29. POLICIES MAP

Consultation point:	Policies Map		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
It would be useful for the Policies Map show the settlement development boundary for Ilkley and the extent of the Green Belt within the neighbourhood area. This will aid readers			
Full Submission:			
It would be useful for the Policies Map show the settlement development boundary for Ilkley and the extent of the Green Belt within the neighbourhood area. This will aid readers			

Consultation point:	Policies Map		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
In relation to the notation of Policy INDP4 on the Policies Map, it is noted that the listed Community Gardens coincide with the Local Green Space or playing field designations, showing up as a dark green colour on the map. These should be shown in Brown.			
Full Submission:			
In relation to the notation of Policy INDP4 on the Policies Map, it is noted that the listed Community Gardens coincide with the Local Green Space or playing field designations, showing up as a dark green colour on the map. These should be shown in Brown.			

30. LOCAL GREEN SPACE ASSESSMENT

Consultation point:	Local Green Space Assessment		
Representation ID:		Comment Type:	Comment
Respondent:	City of Bradford MDC	Agent:	
Summary:			
<p>Would be useful if a summary of the background to the assessment as well as the methodology used to select/assess proposed LGS sites were to be included.</p> <p>Would be helpful to put reference numbers in the site pro-formas. Will allow better cross-referencing within the policy text and the Policies Map.</p> <p>Size of each proposed LGS should be included in the pro-formas.</p> <p>Queried whether the proposed LGS site INDP 10/5 is an extensive tract of land. Question on the pro-forma is confusing – should be checked and answers to this question clarified.</p> <p>INDP 10/8 – should be clarified whether area sold for housing forms part of the designation or not.</p> <p>INDP 10/13 – ownership details should be clarified.</p> <p>INDP 10/16 – see representation regarding Ashlands Road</p> <p>Pro-formas should be proof-read, improved formatting and clarity regarding the answers to some of the questions. Also the consistency of approach to the answers needs to be addressed.</p> <p>The list of proposed Local Green Spaces seems reasonable – need to resolve some of the issues mentioned above.</p>			
Full Submission:			
<p>CBMDC wish to make a number of observations regarding the format of the Local Green Space Assessment document.</p> <p>Firstly, it would be useful if a summary of the background to the assessment as well as the methodology used to select and assess the proposed Local Green Space sites were to be included within the document.</p> <p>Secondly, it would be helpful to the readers to put the reference number in the site pro-formas. This will allow readers to better cross-reference with the text of Policy INDP10 and the designations on the Policies Map.</p> <p>Thirdly, the size of each of the proposed Local Green Space sites should be included in the pro-formas. CBMDC can help provide details if necessary.</p> <p>CBMDC also have some comments regarding individual proposed Local Green Space sites:</p> <ul style="list-style-type: none"> • INDP 10/5 Canker Well (plus other sites) – this is a small site; however, the pro-forma suggests that it is an extensive tract of land. <p>The question on the pro-forma is confusing – the usual question would be ‘Is the site an extensive tract of land?’ But in this case the question is ‘Not an extensive tract of open land?’ an answer of No (as in the case of Canker Well plus others) would indicate that it is an extensive tract.</p> <p>This should be checked and the answers to this criteria question clarified.</p> <ul style="list-style-type: none"> • INDP 10/8 Wheatley Lane Recreation Ground – the pro-forma states part of the site has already been sold off for housing. This should be clarified whether this forms part of the designated site or not as it could be a conflict. • INDP 10/13 Back Stone Way Open Space – ownership details should be clarified. • INDP 10/16 Leeds Road – see comments above in relation to the proposed LGS at Ashlands Road. 			

General comment – the pro-formas would benefit from proof reading, formatting/tidying up and clarity over the answers to some of the questions. Also the consistency of approach to the answers needs to be addressed. The list of proposed Local Green Spaces seems reasonable – need to resolve some of the issues mentioned above.