

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

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

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

This consultation seeks your views on whether the Ilkley Neighbourhood Development Plan meets the Basic Conditions¹ which are that the plan:

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

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

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

How to submit your comments?

Comments can be submitted via the following:

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

Completing the Comment Form

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

Contact Details:

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

- **Telephone:** 01247 433679
- **Email:** planning.policy@bradford.gov.uk
- **Address:** Local Plan Team, City of Bradford Metropolitan District Council, 4th Floor, Britannia House, Hall Ings, Bradford, BD1 1HX

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

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

For Office Use only:	
Date Rec.	14/09/2021
Date Ack.	
Respondent ID	146
Representation Ref:	29853-56

PART A: PERSONAL DETAILS

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

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

1. PERSONAL/AGENT DETAILS		
	PERSON / ORGANISATION DETAILS*	AGENT DETAILS (if applicable)
Title		
Full Name		
Job Title (w here relevant)		
Organisation (w here relevant)	Burley in Wharfedale Parish Council	
Address	[REDACTED]	
Post Code		
Email Address		
Telephone Number		

2. FUTURE NOTIFICATION

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

Yes

No

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

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

For Office Use only:	
Date Rec.	14/09/2021
Date Ack.	
Respondent ID	146
Representation Ref:	29853-56

PART B – YOUR COMMENTS

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

3. To which document does your comment relate? Please place an 'X' in one box only

Neighbourhood Development Plan	X	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

4. To which part of the document does your comment relate?

Whole document	X	Section		Policy	
Page Number					

5. Do you wish to? Please place an 'X' in one box only

Support		Object		Make an observation	X
---------	--	--------	--	---------------------	----------

6. Please use the box below to give reasons for your support / objection or to make your observation and give details of any suggested modifications.

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:

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

For Office Use only:	
Date Rec.	14/09/2021
Date Ack.	
Respondent ID	146
Representation Ref:	29853-56

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.

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

For Office Use only:	
Date Rec.	14/09/2021
Date Ack.	
Respondent ID	146
Representation Ref:	29853-56

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?

6. Signature:



Date:

14/09/2021