

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.	
Date Ack.	
Respondent ID	
Representation Ref:	

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 (where relevant)		
Organisation (where relevant)	Local Plans Team, City of Bradford Metropolitan District Council	
Address		
Post Code		
Email Address		
Telephone Number		

2. FUTURE NOTIFICATION

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

Yes

No

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/>

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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? <i>Please place an 'X' in one box only</i>			
Neighbourhood Development Plan	See Attachment	Basic Conditions Statement	
Consultation Statement		Other (please specify)	

4. To which part of the document does your comment relate?					
Whole document	See Attachment	Section	See Attachment	Policy	See Attachment
Page Number					

5. Do you wish to? <i>Please place an 'X' in one box only</i>					
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.	
<p>City of Bradford Metropolitan District Council has a number of comments/observations on the draft Ilkley Neighbourhood Development Plan. These centre on matters of presentation, typographical amendments, policy content and areas where further clarification is sought. These are detailed on the attached grid.</p>	

6. Signature:		Date:	13.09.2021
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**Ilkley Neighbourhood Development Plan
Regulation 16 Consultation (July to September 2021)
City of Bradford Metropolitan District Council Comments/Observations**

Representation Reference	Chapter/Section	Page Nos.	Policy or Paragraph No.	Comment/Observation
	General Comment	-	-	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. The numbering of the figures should be updated.
	General Comment	-	-	References in the plan to the National Planning Policy Framework should be checked/clarified as the 2021 version has now been published.
	General Comment	-	-	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.
	Chapter 2	8	2.1	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> .
	Chapter 3	11	3.1	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): <i>"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"</i> . If included, paragraph numbering should be updated as required.

	Chapter 3	11	3.3	<p>As mentioned above, it would be useful there were links to/summary of to the relevant Core Strategy policies in this paragraph. These are:</p> <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.
	Chapter 3	11	3.4	<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>
	Chapter 3	11	3.5	<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.</i></p> <p><i>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>

	Chapter 3	13 & 14	Figures 3 & 4	<p>It should be noted that Figures 3 & 4 may potentially include policy details have been superceded or are outdated.</p> <p>A note should be included within the neighbourhood plan document highlight this and directing readers to lists of those policies which have been superceded by the adoption of the Core Strategy, Area Actions Plans and Waste Management DPD. The links are provided below:</p> <ul style="list-style-type: none"> • Core Strategy – Schedule of saved and deleted RUDP Policies • Waste DPD – Saved Policies Schedule
	Chapter 4	17	Objective 3	It is queried where the energy efficiency and low carbon energy part of this objective fits under the heading of ' <i>Cultural Landscape</i> '.
	Chapter 4	17	Objective 5	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.
	Chapter 4	17	Objectives 5 & 6	The thrust of these objectives in reducing private car use and promoting cycling and walking is supported.
	Chapter 5	19	5.1	<p>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>".</p> <p>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>"</p>
	Chapter 5	20	INDP1 – presentation.	<p>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.</p> <p>The addition of headings for each part of the policy would provide clarity and improve its readability. These heading should be as follows:</p> <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. <p>It is suggested that the policy wording within the first paragraph could be simplified for ease of reading/interpretation and state "<i>Within the settlement boundary of Ilkley, new development for housing....</i>".</p>
	Chapter 5	20	INDP1 – Part e)	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.
	Chapter 5	20	INDP1 – Part 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.

	Chapter 5	20	INDP1 – Part f)	<p>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).</p> <p>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> <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.</p> <p>This would have the further effect of complying with the Habitats Regulations, as AECOM put it:</p> <p><i>“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.”</i></p>
	Chapter 5	20	INDP1 – Part g)	<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>dwelling 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>
	Chapter 5	20	5.2	<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>
	Chapter 5	20 & 21	5.3 to 5.7	<p>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.</p>
	Chapter 5	21	5.4 & 5.6	<p>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).</p> <p>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.</p> <p>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.</p> <p>Those settlements where local Green Belt releases are proposed are shown on the Core Strategy Key Diagram.</p>

				Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine them.
	Chapter 5	22	5.7	Typo – delete ‘the’ between ‘of’ and ‘Ilkley’
	Chapter 5	22	5.8	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.
	Chapter 5	24, 25 & 26	INDP2; 5.9 to 5.12	It should be noted that on 1 st 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).
	Chapter 5/Policies Map	28	INDP2/8	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.
	Chapter 5	29	INDP4	It is considered that the policy should include headings in order to improve its readability and aid interpretation. Those suggested are as follows: <ul style="list-style-type: none"> • Protecting Existing Allotments/Community Gardens • Community Orchards; • New Allotment Provision 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><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> 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><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> <p>The plan does not contain any further detail in relation to how this will be undertaken or whether sites have been identified.</p>
	Chapter 5	30	Objective 3 Cultural Landscape	<p>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.</p> <p>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.</p> <p>Ilkley is a location where recognition of NDHAs is most likely to occur and would be of benefit to good Planning.</p>
	Chapter 5	32	Policy INDP5 – part j)	<p>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.</p>
	Chapter 5	32	INDP5 – part k)	<p>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.</p> <p>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 may affect development viability, whilst regarding the latter whether the council is able to consider and monitor sustainability statements.</p> <p>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.</p> <p>National planning policy requires any local requirements for the sustainability of buildings to reflect Government’s policy for national technical standards.</p> <p>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</p>

				<p>F (ventilation) of the Building Regulations to improve the energy efficiency of new homes.</p> <p>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.</p> <p>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.</p>
	Chapter 5	32	INDP5 – part n)	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
	Chapter 5	33	INDP5 – part r)	Point r) contains repetition of point l) – these points should be combined.
	Chapter 5	34	5.21	Is reference to the Sustainable Design Guide SPD still appropriate?
	Chapter 5	34	5.23	This is repetition of earlier policies and not appropriate as part of the justification of this policy.
	Chapter 5	36	5.26	This is repetition of earlier policies and not appropriate as part of the justification of this policy.
	Chapter 5	37	INDP7	The inclusion in the policy of the following wording “ <i>Development should connect with existing pathways and alleyways to encourage walking and cycling and support permeable, accessible movement within the area</i> ” is noted and supported.
	Chapter 5	42	INDP9	Delete ‘ <i>set out</i> ’ after ‘ <i>good design</i> ’ in the third paragraph
	Chapter 5	45	Policy INDP10	<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.
	Chapter 5	45	INDP10/16	<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> <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.</p> <p>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</p>

				<p>version of the Local Plan (under Regulation 18) due to it being within Flood Zone 3.</p> <p>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.</p> <p>In addition, it should be noted that Open Space Audit (2020) identifies the site as an outdoor sports facility (playing field). Emerging Local Plan policy CO1 identifies it as open space.</p> <p>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.</p> <p>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.</p> <p>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).</p>
	Chapter 5	48	5.49	Insert 'Wildlife' between 'Bradford' and 'Habitat'
	Chapter 5	48	INDP11	<p>The reference in paragraph 5.49 to habitat network being augmented at neighbourhood level is welcomed.</p> <p>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.</p>
	Chapter 5	56	5.56	<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>
	Chapter 5	56	5.57	<p>The list of the sites of ecological significance within Wharfedale should include the following sites/assets:</p> <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)
	Chapter 5	59	Figure 12	A key should be provided alongside the map to aid interpretation.
	Chapter 5		INDP13	The inclusion of this policy is welcomed and it supports Bradford Core Strategy policies 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.
	Chapter 5	61	INDP14	The elements of the policy which places emphasis on sustainable transport measures and vehicle charging are supported. 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.
	Chapter 5	62	5.63	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.
	Chapter 5	62	5.64	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?
	Chapter 5	63	INDP15 & INDP16	Policies INDP 15 and INDP 16 are considered to be broadly fine. 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 ‘footpath, bridleway and cycle path network’ has been taken on board. It is considered that the same amendment should be made to the final sentence of the policy so that it reads ‘the loss of existing footpaths, bridleways and cycle paths will be resisted’. 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.
	Chapter 5	63	INDP15	The emphasis placed on ensure that new developments are accessible by walking and cycling is supported.
	Chapter 5	64	INDP16	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.
	Chapter 5	74	INDP20	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. 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

				<p>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>
	Chapter 5	74 & 75	Supporting Actions – Town Centre & Car Parking; 5.81	<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>
	Chapter 5	76	INDP21; 5.85	<p>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.</p>
	Chapter 5	76	INDP21 – part f)	<p>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:</p> <p><i>“f) Include spaces or features that support healthy and active lifestyles”</i></p>
	Chapter 5	77	5.84	<p>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?</p>

	Chapter 6	81	6.1 to 6.3	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.
	Policies Map	-	Policies Map	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.
	Policies Map	-	Policies Map	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.
	Local Green Space Assessment Document		Local Green Space Assessment	<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. <p>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.</p> <p>The list of proposed Local Green Spaces seems reasonable – need to resolve some of the issues mentioned above.</p>