

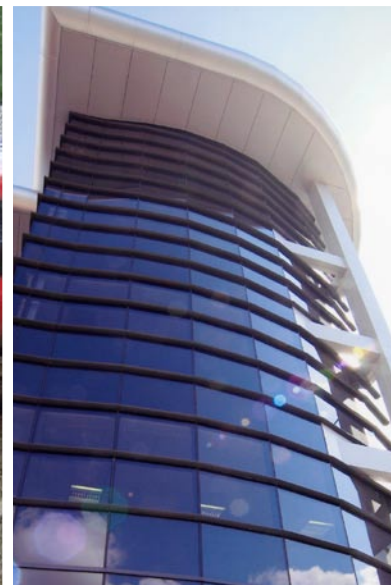
Local Development Framework for Bradford

Core Strategy

Further Issues and Options

Summary of Representations

June 2008



City of Bradford MDC

www.bradford.gov.uk

CORE STRATEGY FURTHER ISSUES & OPTIONS CONSULTATION SUMMARY OF REPRESENTATIONS

INTRODUCTION

As required by The Town and Country Planning (Local Development) (England) 2004 Regulations, consultations have been carried out on the Core Strategy Further Issues & Options in accordance with Regulation 26 and 27. The Regulations require Local Planning Authorities to consider any representations made within a six-week period of consultation and to have regard to them when preparing a Development Plan Document for submission to the Secretary of State.

Over 1000 organisations and individuals were notified by letter about the Further Issues & Options consultation and the availability of the consultation reports. Subsequently, over 250 copies of the Report were sent to specific and general consultation bodies as required by the Regulations and also to individuals who had requested a copy. The circulation list is included at the back of the Schedule of Representations.

Respondents in many cases used only the Council's Questionnaire to reply; others submitted detailed and lengthy written representations either instead of or in addition to the questionnaire.

The attached Schedule of Representations sets out in tabular form the Representations from the 316 organisations and individuals who replied. Often, the representation was simply 'agree' or 'disagree' with little or no indication as to the reasons; in these cases, it was mostly considered unnecessary to comment and it would have been difficult to do so any way.

The Schedule of Representations does not include comments received from the Options Forms completed at the consultation events. These replies can be found within the event Consultation Logs.

The attached schedule is divided into the following sections:

- 1) The Vision
- 2) The Objectives
- 3) What is your preferred option?
- 4) The Settlement Study
- 5) The Initial Sustainability Appraisal
- 6) Housing
- 7) Economy & Jobs
- 8) Transport & Accessibility
- 9) Community Facilities
- 10) Environment
- 11) Waste Management
- 12) Specific Areas
- 13) General

Should it be necessary to do so, the original representations can be made available for inspection.

LIST OF CONSULTEES THAT SUBMITTED GENERAL COMMENTS ON THE FURTHER ISSUES & OPTIONS STAGE OF THE CORE STRATEGY

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
1.	00320	Mrs Janet Cuff	Able All Physical Disabled Forum	
2.	00205	John Litt	Northwest Regional Development Agency	
3.	00485	Mrs Jean Walker	Bradford District Senior Power	
4.	00082	Wilfred Shaw	Ilkley Design Statement Group	
5.	00486	Mrs Irene Hudson		
6.	00487	Michael Newman	Baildon Moravian Church	
7.	00020	Mr Bruce Barnes		
8.	00110		West Register Realisations	The Land & Development Practice
9.	00492	Mick Thompson		
10.	00491	James Belk		
11.	00490	A Walker		
12.	00489	Shauna and Robert Banks		
13.	00493	M Turner		
14.	00494	Richard Kunz		
15.	00495	Shelia Robinson		
16.	00092	Emma Williams	National Offender Management Service	
17.	00016	Susan Stead	Bradford Urban Wildlife Group	
18.	00496	John Bretherick	Secretary of Salts Tennis Club	
19.	00497	Laura Crawford		
20.	00498	Norman Scarth		
21.	00499	Robin Coghlan	Leeds City Council	
22.	00152	Cllr Roger L'Amie	BMDC	
23.	00045	Ian Smith	English Heritage	
24.	00488	Mr Vincent Shaw		
25.	00113	Ian Sanderson	West Yorkshire Archaeology Advisory Service (WYAAS)	
26.	00500	Duncan Hartley	Hartley Planning Consultants	

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
27.	00194	Sam Kipling	Environment Agency	
28.	00501	Ray Wilkes		
29.	00074	Cllr Chris Greaves	BMDC	
30.	00502	Mrs Suzanne F. Atkinson		
31.	00503	Mr P.H. Flesher		
32.	00504	Dr Eileen White		
33.	00461	Mrs Joanne Besford & Mr Tony Zacharczuk		
34.	00505	Mr Alvin Norman	Friends of Buck Wood	
35.	00506	Christine Kay		
36.	00043		Costco Wholesale UK	RPS Planning & Development
37.	00186	John Pilgrim	Yorkshire Forward	
38.	00507	Dale Cordingley		
39.	00508		Wain Homes	Barton Willmore
40.	00509	Rachel Wigginton	Government Office for Yorkshire and Humber (GOYH)	
41.	00510	Samantha Turner	North West Regional Assembly	
42.	00115	Michael Baldwin	Wharfedale Friends of the Earth	
43.	00197	Nicola Holmes	Network Rail	
44.	00255	Peter Ward	Menston Community Association	
45.	00081	Helen Kidman	Ilkley Civic Society	
46.	00511		Countryside Properties Ltd	Drivas Jonas
47.	00004		Arnold Laver	Drivas Jonas
48.	00512		Tesco Stores Ltd	Burnett Planning & Development
49.	00213	Cllr Gordon Metcalf	Menston Parish Council	
50.	00513		Langtree Artisan	Spawforths
51.	00101		Royal Mail Group	Sanderson Weatherall
52.	00514	Sandy MacPherson		
53.	00515	Peter Boys	Brother Investments Ltd	
54.	00084		Keyland Developments Ltd	Sanderson Weatherall
55.	00516		Asda Stores Ltd	Drivas Jonas

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
56.	00517	S.Drye		
57.	00518		GMI Waterside Shipley Ltd	Sanderson Weatherall
58.	00519	Andy MacDonald	BMDC – Schools	
59.	00088		Miller Strategic Land	Spawforths
60.	00520	Simon East		
61.	00521		Mi7 Developments	White Young Green
62.	00522		Prime Property Investments	White Young Green
63.	00040		Commercial Estates Group	White Young Green
64.	00523		Taylor Wimpy UK Ltd	Dacres, Son & Hartley
65.	00524	Mrs Lesley Bosomworth		
66.	00021	John Grundy		
67.	00525	Ms Josephine Vento		
68.	00062		Hallam Land Management	Nathaniel Lichfield and Partners
69.	00526	David Herdson		
70.	00527	Colin Holm	Natural England	
71.	00528		Fox Land & Property	Turley Associates
72.	00200	Matthew Naylor	Yorkshire Water	
73.	00529		Clays of Addingham	Dacre, Son & Hartley
74.	00530	David Blackburn		
75.	00097	Charles Patchett	Patchett Homes	
76.	00531	Mr and Mrs Hopwood		Walker Morris
77.	00532	Mr Tony Kemp		Carter Jonas
78.	00083	Mrs Christine Dale	Ilkley Parish Council	
79.	00010	Mr Harvey Bosomworth		
80.	00533	Mr Poolton		Turley Associates
81.	00534	Roy Donson	Barratt Developments Plc (Barratt Homes)	
82.	00087	John Davis	Metro	
83.	00535		National Grid	Drivas Jonas
84.	00536		Adare Group	Drivas Jonas
85.	00537	Stephen Corbett		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
86.	00214	Jo Griffiths	Burley Parish Council	
87.	00538	W. L. Evans		
88.	00539	Mr & Mrs Richterich		
89.	00540	David Machin		
90.	00541	Mr John Horton		
91.	00542	Mr Andrew Mawson	Bingley Branch Labour Party	
92.	00543	Cllr Kathleen Brown	Ilkley Parish Council	
93.	00544	Joan Hyde	Baildon Community Council	
94.	00147	Cllr Howard Middleton		
95.	00545	Sue Skinner		
96.	00481	Jeff McQuillan		
97.	00546	Andy Haigh	Yorkshire and Humber Assembly	
98.	00547	Mr Geoff Best		
99.	00548	Mrs Audrey Hall		
100.	00549	Shelia Suddards		
101.	00550	Anne Knott	Haworth Crossroads Stanbury Town Council	
102.	00551	Joe Varga		
103.	00552	Maura Fisher Peake		
104.	00553	Graeme Willson		
105.	00011	Maud Marshall	Bradford Centre Regeneration (BCR)	
106.	00015	Nicky Hoyle	Bradford & Airedale PCT	
107.	00554	Mr V & Mrs S Beckley		
108.	00555	Mr I & Mrs C Campbell		
109.	00556	Mr K & Mrs E Earl		
110.	00557	Mr E & Mrs Kinsella		
111.	00558	Mr P & Mrs B Haley		
112.	00559	Mr B Jefferies		
113.	00560	Mr & Mrs Maynard		
114.	00561	Mr G & Mrs B Cougan		
115.	00562	Mr K & Mrs M Dickinson		
116.	00563	Mr Peter & Mrs Valerie		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
		Sorge		
117.	00564	Mr Bottomley		
118.	00565	Mr Richard & Mr Carter Hoddy		
119.	00566	Ms Joan Elks		
120.	00567	Mrs Carole Parker		
121.	00568	Ms Diana Gill		
122.	00569	Mr M & Mrs P Robinson		
123.	00570	Mr P R & Mrs T Sanderson		
124.	00571	Mr G M & Mrs G W Everall		
125.	00572	Mr J & Mrs A Parker		
126.	00573	Mr T & Mrs M Morton		
127.	00574	Ms Elaine Stott		
128.	00575	Mr A & Mrs J Bentley		
129.	00576	Pat Renton & Adrian Hill		
130.	00577	Mr K & Mrs T Raistrick		
131.	00578	Mr A B Braithwaite		
132.	00579	Mrs Jean Feather		
133.	00580	Mr Keith Renshaw		
134.	00581	Dr G M & Mrs C A Dobbs		
135.	00582	Mrs Marjorie Legg		
136.	00583	Mr or Mrs D Brimacombe		
137.	00854	Mr & Mrs Kennedy		
138.	00585	Mr D Ferry		
139.	00586	Mr R & Mrs M Halliday		
140.	00587	Mr S Dyer		
141.	00588	Ms Constance Pilkington		
142.	00589	Mr K & Mrs M Thornton		
143.	00590	Mr William Slessor		
144.	00591	Mr or Ms M Hyde		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
145.	00592	Ms Pamela Poole		
146.	00593	Mrs R King		
147.	00594	Mr J & Mrs P Jennings		
148.	00595	Mrs B Stevens		
149.	00596	Mr Davis		
150.	00597	Mrs Empsall		
151.	00598	Mr or Ms D Wilkinson		
152.	00599	Mrs R Newsham		
153.	00600	Mr R & Mrs J M Woolley		
154.	00601	Mrs M Sunderland		
155.	00602	Mr P & Mrs M Bailey		
156.	00603	Mr D & Mrs A Bailey		
157.	00604	Mr M & Mrs C Bailey		
158.	00605	Mr & Mrs Bottomley		
159.	00606	Mr J & Mrs J Hardy		
160.	00607	Mr L & Mrs S Balaram		
161.	00608	Mr Don Morris		
162.	00609	Mr S & Mrs S Munir		
163.	00610	Mr or Ms R Craven		
164.	00611	Mr Michael Seery		
165.	00612	Mr or Ms G Hudson		
166.	00613	Mr A Thornton		
167.	00614	Mr or Ms Roberts		
168.	00615	Mr K & Mrs U Harris		
169.	00616	Mr E Dinsdale		
170.	00617	Mr M & Mrs E Rich		
171.	00618	Mr C & Mrs C Rumbold		
172.	00619	Mr or Ms B Briggs		
173.	00620	Mr F & Mrs M Strauss		
174.	00621	Mrs A Ronkowski		
175.	00622	Ms Suzanne Hague		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
176.	00623	Mr Robert Hague		
177.	00624	Mr C & Mrs Johnson		
178.	006	Mr M & Mrs A Reynard		
179.	00626	Mrs D Iles		
180.	00627	Ms Victoria Aird		
181.	x	Mr David Aird		
182.	00628	Ms Elizabeth Shaw		
183.	00629	Ms Sally Binns & Mr William Clark		
184.	00630	Ms Dorothy Edge		
185.	00631	Ms Jennie Bailey		
186.	00632	Mr Norman Potter		
187.	00633	Mr K & Mrs P Thornton		
188.	00634	Mr or Ms D Hudson		
189.	00635	Mr or Ms J Gott		
190.	00636	Mr C & Mrs B May		
191.	00637	Mrs J Grimes		
192.	00638	Mr or Ms J Paul		
193.	00639	Mr R Coverdale, Mrs L Coverdale and Miss A Coverdale		
194.	00640	Mr & Mrs Halliday		
195.	00641	Mr M & Mrs S Thornley		
196.	00642	Mr P & Mrs N Brumfitt		
197.	00643	Mr R & Mrs K Luczyn		
198.	00644	Mr J & Mrs B Bower		
199.	00645	Mr & Mrs Airey		
200.	00646	Mrs O Harland		
201.	00647	Ms Yvette Harland		
202.	00648	Ms Jean Sands		
203.	00649	Ms Louise Westman		
204.	00650	Mr & Mrs Westman		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
205.	00651	Mrs M Stoney		
206.	00652	Mr & Mrs Carter		
207.	00653	Mr & Mrs Giles		
208.	00654	Ms Christine Pollard		
209.	00655	Mr or Ms I Sheffield		
210.	00656	Mr or Ms P Sheffield		
211.	00657	Mr B & Mrs P Cripps		
212.	00658	Mrs F Sanderson		
213.	00659	Mr S & Mrs E Wiggins		
214.	00660	Miss H Wiggins		
215.	00661	Ms Marion Seymour		
216.	00662	Mr B & Mrs L Vasquez		
217.	00663	Mr T & Mrs C Bloor		
218.	00664	Ms Jessica Bloor		
219.	00665	Mr B & Mrs L Lawrence		
220.	00666	Mr or Ms R Lawrence		
221.	00667	Mr J & Mrs R Wood		
222.	00668	Mr J P & Mrs P M Spencer		
223.	00669	Mr or Ms D Holdsworth		
224.	00670	Mr M & Mrs S Stephens		
225.	00671	Mr Paul Stephens		
226.	00672	Mr or Ms J Evans		
227.	00673	Mr & Mrs J		
228.	00674	Mr P J & Mrs M E Hope		
229.	00675	Mr J E & Mrs J V Woodhead		
230.	00676	Mr W & Mrs M Lawson		
231.	00677	Mr or Ms E M Beatty		
232.	00678	Mr & Mrs Adiey		
233.	00679	Mr & Mrs Collingwood		
234.	00680	Ms Irene Thackray		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
235.	00681	Mr & Mrs T G Ibbittson		
236.	00682	Miss E Bullen		
237.	00683	Miss G Greengrass		
238.	00684	Mr John Charrison		
239.	00685	Mr Gordon Tinsley		
240.	00686	Mr or Ms N S Creek		
241.	00687	Mrs J M Woodward		
242.	00688	Mrs Nancy Emmott		
243.	00689	Mr J & Mrs S Cooley		
244.	00690	Mr A & Mrs J Annakin		
245.	00691	Mr Ron Bell		
246.	00692	Mr or Ms M Bevenage		
247.	00693	Mr or Ms B Hart		
248.	00694	Mr or Ms L Stross		
249.	00695	Mr C J & Mrs D Bennett		
250.	00696	Mr David Fawcett		
251.	00697	Mr & Mrs C Pool		
252.	00698	Mrs June James		
253.	00699	Mr & Mrs Mahowey		
254.	00700	Ms June Catterall		
255.	00701	Mr & Mrs G.W. & M.M Hall		
256.	00702	Mr or Mrs V Yewdall		
257.	00703	Mr R & Mrs G.M Bloor		
258.	00704	Mr D & Mrs S David Heath		
259.	00705	Ms Daphne Smith		
260.	00706	Mr A & Mrs C Ward		
261.	00707	Mr J & Mrs L Nelson Dr James Nelson		
262.	00708	Ms Janet Saunders		
263.	00709	Mr Matthew Nunn		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
264.	00710	Mr G & Mrs A Nunn		
265.	00711	Mr Alan Plowright		
266.	00712	Mrs Sylvia Hendry		
267.	00713	Mr & Mrs H & V Baldwin		
268.	00714	Mr & Rs B.W Town		
269.	00715	Mr A & Mrs E Chester		
270.	00716	Ms Lisa Brassington		
271.	00717	Mr Anthony Pike		
272.	00718	Ms Bekker		
273.	00719	Mr D & Mrs C Sellers		
274.	00720	Mrs D Turner		
275.	00721	Mrs F Grundy		
276.	00722	Mr M & Mrs A Leyland		
277.	00723	Ms Muriel Bridge		
278.	00724	Mr or Ms A Mathering		
279.	00725	Mr A & Mrs P Walton		
280.	00726	Mr or Ms R. W Pedley		
281.	00727	Mr or Ms S.D Pedley		
282.	00728	Mr or Ms C Pedley		
283.	00729	Mr or Ms G Pedley		
284.	00730	Mrs Sheila Edwards		
285.	00731	Mr or Ms G.R Kay		
286.	00732	Mr or Ms J.L Howard		
287.	00733	Mr W & Mrs A Malloy		
288.	00734	Mr I & Mrs A Spandler		
289.	00735	Mr & Mrs P.R & J.E Waler		
290.	00736	Mr G.D & Mrs J.E Land		
291.	00737	Mr & Mrs Jowett		
292.	00738	Mr Robert Bently		
293.	00739	Mrs R.E Truelove		
294.	00740	Mr E & Mrs L Gledhill		

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
295.	00741	Ms Michelle Gledhill		
296.	00742	Ms Lisa Edwards		
297.	00743	Mrs H.M Hague		
298.	00744	Mr & Mrs D & S.W Ingham		
299.	00745	Mr & Mrs K.J Peter Norfolk		
300.	00746	Mr & Mrs Shaw		
301.	00747	Ms Alison, Jane Shaw		
302.	00748	Mr N & Mrs V Brickley		
303.	00749	Mr David & Mrs Carol Driver		
304.	00750	Mr & Mrs J & Mottershead		
305.	00751	Mr Michael & Mrs Caroline Turner		
306.	00752	Mr Denis & Mrs Susan Shaw		
307.	00753	Mr or Ms F. M Bloor		
308.	00754	Mr Rob Higgle		
309.	00755	Mr or Ms Cresswell		
310.	00756	Mr Harry & Mrs Christine Moon		
311.	00757	Mr & Mrs A Sharman		
312.	00758	Mr A.K & Mrs B Styles		
313.	00759	Mr J Binns		
314.	00763	Adele Gunn		
315.	00768	Rachel Gunn	Craven District Council	
316.	00769	Boyd Riddlesden		
317.	00076	Nick Whitford	Highways Agency	

1. Core Strategy: Further Issues & Options – Responses to Question 1 – The Vision

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
01/ 00320	Mrs Janet Cuff, Able All Physical Disabled Forum	Disagree
07/ 00020	Bruce Barnes	Agree
17/ 00016	Susan Stead, Bradford Urban Wildlife Group	Partly Yes, Partly No. The vision of Bradford created by 2026 is too idealistic.
21/ 00499	Robin Coghlan, Leeds City Council	Agree with the following exception: The Vision for the Bradford Urban Area states that the M606 corridor will be the focus for commercial development. The objection is that “commercial” implies <i>all</i> types of employment-based development would be acceptable including offices. The location is out-of-centre. This would undermine Leeds’ approach of seeking to focus new office development into its city centre & town centres to support their health & vitality & to enable greater use of public transport rather than the car. The word “commercial” should be replaced with “light industrial & warehousing”.
23/ 00045	English Heritage	We support the proposed Spatial Vision for Bradford District, especially Paragraph 2.5 relating to the protection and enhancement of its cultural and built heritage and the reinforcement of its local distinctiveness. Bradford has a considerable wealth of historic assets. It ranks 3 rd in the region for total number of designated assets including one of only two World Heritage Sites in Yorkshire. The historic environment plays an important role in defining the distinctive character of its settlements, makes an important contribution to the economic well-being of the District and its renaissance agenda, and to the quality of life of its communities. Consequently, it is wholly appropriate that the historic environment is included within the overarching Vision.

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Vision for Bradford City Centre</p> <p>As Paragraph 6.19 of the Settlement Study Notes, there are four Conservation Areas within the City Centre and a high concentration of Listed Buildings. Bradford has a particularly distinctive City Centre and, unique amongst most of the Cities in the north, a building material which is used consistently across the City (certainly up to the 1950s anyway). In Little Germany it has, arguably, the finest merchant's quarter in the country.</p> <p>The need to ensure that this wealth of historic assets is safeguarded and that the unique character of the City Centre is reinforced and used to inform decisions on development proposals should be included in the Vision for this area of the District.</p>
		<p>Vision for Bradford Urban Area</p> <p>We welcome the identification of the conservation of Saltaire World Heritage Site within the Vision for this part of the District. However, the wording of Paragraph 2.11 is a little unclear.</p> <p>It might be useful, given the important role which Saltaire plays in raising the profile of the District, to include something along the lines that:-</p> <p><i>“Saltaire will be enhanced as a “living village”, thriving commercial area, and tourist destination in a manner which preserves and enhances the character and setting of the World Heritage Site. Saltaire will be used as a focus to help deliver the regeneration initiatives within this part of the City.”</i></p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Vision for Wharfedale</p> <p>Ilkley is an important historic settlement with a Conservation Area which encompasses a large extent of its built-up area. As the Conservation Area Appraisal notes, its landscape setting is extremely important in defining the character of the settlement. Consequently, if the town is to be an area of housing growth, it is important that it takes place in a manner which safeguards its historic character. Therefore, Paragraph 2.19 line 5 should be amended to read:- <i>“..this popular residential location in a manner which safeguards its historic character, commensurate with a town of its size...”</i></p> <p>There are large concentrations of nationally-important carved rocks on both Ilkley and Rombalds Moor. Consequently, it would be more appropriate for Paragraph 2.19 line 9 to refer to <i>“...safeguarding its archaeological remains and unique biodiversity...”</i></p> <p>Vision for Pennine Towns</p> <p>Whilst we would support specific mention of Haworth within the Vision for this part of the District, the need to manage tourism is not simply to ensure that it does not undermine the settlement’s role as residential area and employment base but, equally importantly, tourism also needs to be managed to ensure that the historic character of the village is not adversely affected. This aspect needs to be reflected in the Vision for Haworth.</p>
24/ 00488	Mr Vincent Shaw Victor Road Community Project	Yes
25/ 00113	West Yorkshire Archaeology Advisory Service	<p>Para. 2.11. WYAAS welcome the intention to safeguard the conservation of Saltaire as a World Heritage Site but have concerns that this may conflict with the stated intention to enhance the area as a "successful commercial area" .</p> <p>WYAAS would note that the presence of a Class II moated site in central Esholt if Esholt is to be potential housing growth point. The consideration of options makes no mention of such regionally important archaeological sites that the UDP currently provides a measure of protection to.</p> <p>WYAAS would also have concerns at any proposal to intensify housing density in central Ilkley given the presence of the conservation area and the scheduled Roman fort.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
26/ 00500	Hartley Planning consultants on behalf of Mr M Booth	No. Part 2 correctly identifies Ilkley as remaining the principal town in Wharfedale and that it will serve the surrounding area in terms of jobs, and a range of shops and services.
		A clear definition is required in paragraph 2.19 of which settlements are included in the reference to a “surrounding area”; this sentence states that Ilkley “...will serve the surrounding area in terms of providing jobs,...”. As the principal town in Wharfedale, Ilkley serves a very wide catchment area for jobs, shops and services. If the town is to provide for jobs, as detailed in Part 2, Ilkley must provide for new employment land.
		There is no reference in Part 2, or in the spatial options at Part 4 of the Core Strategy, to the role Ilkley has in providing for employment growth. Specific reference is required here to the need to provide of new employment land at and near Ilkley.
34/ 00505	Mr Alvin Norman Friends of Buck Woods	Yes. Shipley may have good public transport connections but these are negated by congestion on the roads and overcrowding of trains.
38/ 00507	Dale Cordingley	The growth figures predicted are flawed. At the meeting the presenter said that the Council did not believe that the figures given by the Government were sensible, but now felt compelled to go ahead with developing plans to achieve the growth in housing requested. The Core Strategy document may allude to this concern in 1.21, but leaves the matter very vague. The growth will rely on market demand (see below). The projected figures need questioning in depth and the lack of challenge shows considerable weakness in thinking on the matter. It is absolute madness to go ahead on this basis.
		I have considerable concern relating to the statement in 2.6., where it says “By 2026 all development taking place in the district will be carbon neutral”. This is much too late and will cause immense damage to the environment in the meantime. The Council needs to drive through these measures much, much earlier in the timescale.
		It appears that insufficient thinking has gone in to the sustainability aspects of the Core Strategy, particularly in relation to transportation and accessibility. This needs addressing in order to minimize the impact of any new developments.
39/ 00508	Barton Wilmore on behalf of Wain Homes Ltd.	Leeds City Region Growth Points Initiative Bradford Council should consider the growth options which are most likely to deliver maximum levels of housing and employment. Relying on green belt releases in environmentally sensitive areas, such as those near Keighley and Ilkley is not conducive to such growth and the capacity of the highways in these areas will also make growth difficult.

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Pennine Towns and Villages by 2026</p> <p>The Core Strategy acknowledges that Queensbury has a diverse local retail offer, employment base and good public transport links to Bradford and Halifax. These are essential to a sustainable community and as such, Queensbury is an ideal location for growth. Yet the vision in para 2.24 states that Queensbury will merely maintain the existing retail offer and employment base. Bradford Council should be far more ambitious regarding its aspirations for Queensbury given that it is such a sustainable location and should be looking to grow its housing and services.</p>
40/ 00509	Government Office for Yorkshire & Humber	<p>I note that you have not revised the spatial portrait and key issues, which were previously consulted on. You will, however, need to include these in the submission document as the foundation for the vision and strategic objectives and I am not sure they currently set clear enough priorities for the spatial strategy. The spatial portrait should be an honest account of current social, demographic, economic and environmental conditions i.e. we need to know what Bradford is like now. This should be inclusive and not just restricted to planning matters. Clear, focused key issues developed from the spatial portrait will then provide the foundation for the whole spatial strategy.</p> <p>I suggest you need to consider prioritising the key issues for Bradford based on importance to the District, available resources and other factors. These priorities should derive from the Sustainable Community Strategy and LAA as well as RSS and national planning guidance. It then should be possible to give more a focused direction and structure to the spatial strategy, based on key issues such as social inclusion, housing growth and affordability, access to employment and climate change. Strategic waste should also be picked up here.</p> <p>It should be made clear how the vision flows from the key issues. It should be a locally distinctive, realistic and inclusive vision of what Bradford will be like at the end of the plan period and should be more explicit about the need to work with other stakeholders. As it stands some aspects are very aspirational and I am not sure it is all realistic within the plan period. It should also be more focused in prioritising the key issues for the District. Paragraphs 2.2 to 6 should be made more locally specific by clarifying the relation to the priority key issues and paragraph 2.3 should refer to Bradford's role in the Leeds City Region.</p>
42/ 00115	Michael Baldwin	Yes, no additions or deletions.

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
43/ 00197	Network Rail	Paragraph 2.9 relating to new railways stations – please note that Network Rail is aware of proposals for new railways stations at Apperley Bridge and Low Moor and support these developments. However with regards to new railway stations at Manningham and Laisterdyke please be aware that new stations and hence additional stops along a line can create difficulties. The additions of new stops increases journey times, affecting timetables and will subsequently impact on the Train operating Companies. In particular a new railway station at Manningham would have serious repercussions on this train line.
50/ 00513	Spawforths on behalf of Langtree Artisan	The Vision is appropriate and we support the strategic planning up to 2026. We support the vision for Bradford City Centre to have an enhanced role as a thriving sub regional shopping, cultural, civic and commercial centre and the main focus for investment and jobs in the retail and commercial centres, alongside city centre living which the New Victoria Place proposals on the former Odeon site advocates. The New Victoria Place proposals will also help drive regeneration of the city centre, creating a new and enhanced public open space and expand the employment offer, bringing confidence to the District as a whole.
51/ 00101	Sanderson Weatherall on behalf of Royal Mail Group Property	Yes
53/ 00515	Mr Peter Boys, Brother Investments (Yorkshire) Ltd	Yes
54/ 00084	Sanderson Weatherall on behalf of Keyland Developments Ltd	Yes. The vision set out in part 2 of the Spatial Vision and Strategy is, perhaps inevitably, set out in the most general of terms. It is how this vision will be translated into the broad options and then to specific development proposals, on which we will comment in detail. In the most general sense, the overall vision can be supported as it follows general principles of national planning policy relating to balanced communities. However, support for that overall vision does not necessarily infer support for particular development options.

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
55/ 00516	Drivers Jonas on behalf of Asda Stores Limited	As well as supporting the growth of the Sub Regional City of Bradford, ASDA recognises the need to pursue development opportunities in the Principle Towns of Ilkley and Keighley to cater for local needs and promote sustainability. ASDA actively support this aspiration, promoted most effectively within Spatial Option1 of the Core Strategy, having recently acquired an Outline Permission for the development of a new store within the town of Keighley.
		Whilst offering support to the need to sustain growth within existing centres, ASDA also agrees with the Council's desire to develop new commercial and shopping facilities beyond the current settlement limits as presented in Spatial Option 4. ASDA believe that in bringing forward additional sites for development purposes Bradford will benefit from increased vitality and viability. ASDA would therefore support a policy which, whilst the protecting the role of the existing centres and their supporting facilities, may also deliver wider sustainability, economic and social objectives, thus ensuring greater flexibility in meeting the needs of local communities.
57/ 00518	Sanderson Weatherall on behalf of GMI Waterside Shipley Ltd	Yes. It is set out in general terms inevitably, but the importance of Shipley and the World Heritage Site at Saltaire, particularly given the objectives of the Airedale masterplan, are supported.
59/ 00088	Spawforths on behalf of Miller Strategic Land	The Vision seems appropriate and we support the strategic planning up to 2026. Nevertheless, given the timescales at present it may be prudent to plan beyond 2026 to provide a vision for 15 years from the date of adoption. The provision of a new railway station at Apperley Bridge is supported and we would highlight the need for its early implementation in the Plan period.
61/ 00521	White Young Green on behalf of Mi7 Developments Ltd	WYGP supports the overall Bradford District Spatial Vision of being a vibrant place that promotes sustainable living as a place where residents have good access to a wide range of services and opportunities. We also support the vision of Bradford District being a strong driver of the sub-regional economy, supporting growth with high quality employment and housing provision. WYGP further supports the aims of the District being well connected where facilities and amenities are in locations that encourage walking, cycling and the use of public. We also endorse the District Vision of achieving new development to contribute to the renaissance of the District by building upon the existing character of the District through promoting high quality sustainable design.

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
		WYGP welcomes the vision for Bradford City Centre to be a major economic driver of the District with an enhanced role as a thriving sub regional shopping, cultural, civic and commercial centre. We also agree with City Centre living being encouraged alongside providing the facilities and amenities to support this type of living. WYGP fully supports the CS vision of the University and the College playing an important role in the local economy, that will aid in the development of new creative and knowledge based industries to attract new investment as well as attracting people to live, work and visit. We also agree that this investment in the University and College will bring new confidence to the District's overall economic success.
62/ 00522	White Young Green on behalf of Prime Property Investments Limited	We offer support of the overarching vision for Bradford District which mentions that as a whole Bradford will be a vibrant place that promotes sustainable living and development by 2026. On the back of this we support the drive for Bradford District becoming a strong player in the Sub-Region's economy, supporting economic growth with high quality housing provision. WYG fully endorses the idea that smaller settlements including Local Service Centres should maintain their own identity and sense of community whilst encouraging improvements to be made to the linkages with larger urban areas such as Keighley and Bradford.
63/ 00040	White Young Green on behalf of Commercial Estates Group	We offer support of the overarching vision for Bradford District which mentions that as a whole Bradford will be a vibrant place that promotes sustainable living and development by 2026. On the back of this we support the drive for Bradford District becoming a strong player in the Sub-Region's economy, supporting economic growth with high quality housing provision. WYG fully endorses the idea that smaller settlements including Local Service Centres should maintain their own identity and sense of community whilst encouraging improvements to be made to the linkages with larger urban areas such as Keighley and Bradford.

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
64/ 00523	Dacre, Son & Hartley on behalf of Taylor Wimpey UK Ltd	<p>We generally support the majority of what is said in the 'Spatial Vision'.</p> <p>On a more minor matter, and with respect to the text on Airedale by 2026, we consider more should be said about the regeneration of Keighley as a Principal Town using similar phrases to the text on regenerating Bradford's city centre and the main urban areas.</p> <p>The text on the relationship between Steeton and Silsden could also be improved to promote a joint approach to developing Silsden and Steeton making better use of the rail connection through improvements to the public transport network and parking facilities at the station.</p> <p>We are broadly supportive of the identified Strategic Objectives. However, a missing objective is one that connects 'housing needs' with 'economy and jobs', ensuring that jobs and homes are located close to one another.</p>
65/ 00524	Mrs Lesley Bosomworth	<p>No. For Burley-in-Wharfedale and Menston the emphasis seems to be <u>good</u> rail connections – at peak times it is <u>not</u> good –very over crowded – no ticket machine at Burley. This issue have already been taken up by wrug with Northern Rail but turned down. There is no mention of retaining the character or identities of the villages of Burley-in-Wharfedale and Menston. These two villages are very different and have as much right to retain their individuality as these villages in Airedale and Pennine</p>
66/ 00021	Mr John Grundy	<p>No. Bradford is unlikely to retain its distinctive character if its only ambition is to become a sub-regional City to Leeds.</p>
68/ 00062	Nathaniel Lichfield & Partners on behalf of Hallam Land Management	<p>Paragraph 2.8 states that “the Bradford Urban Area will be the main focus for new housing provision” and that “emphasis will be placed on the expansion of the urban area in sustainable locations”. The acknowledgement by the Council that extensions to existing urban areas will be needed to accommodate growth in the District to 2026 is supported. This strategy is also consistent with sustainable development principles established in national and regional planning policy. The need for such extensions can be determined through the preparation of Strategic Housing Land Availability Assessment.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
70/ 00527	Natural England	Natural England welcomes the spatial vision for 'Bradford District as a whole by 2026'. In particular we welcome the vision's recognition of the District's distinctive landscapes, as well as its citing of the need to provide quality green infrastructure, recognised for its value to biodiversity and people. We also support the vision's recognition of Bradford's unique cultural and built heritage as an asset to be protected and enhanced, as well as the role that sustainable design will have to play. Further, we are pleased to see an aim to make all development carbon neutral, and adapted to the effects of climate change.
		The visions for different areas follow from this vision for the District as a whole and we are pleased to see that the Council has recognised that each of the settlements has a role to play in meeting the vision. Each area has a unique context, which is also reflected in the Settlement Study, and we welcome the setting out of the special contribution that individual areas can make. However, it should be recognised that each of the areas must play its role in meeting the overall vision. For instance, we would consider that 'high quality sustainable design' is as important in rural areas as urban areas. To this end, it would be useful to provide some explanatory text to explain how the individual area visions relate to the vision for Bradford as a whole.
		We welcome the reference to creating 'new and accessible public open spaces' in Bradford City Centre and 'recreation and open space' in the Bradford Urban Area, but would suggest that this will be an issue for all areas where there is currently insufficient green space. We would also suggest that it will be important to protect, improve the quality of and management of open spaces, particularly green spaces. Natural England welcome the integration of data from the District's Open Space, Sport and Recreation Study in the Settlement Study, but feel that this should inform the area visions though further references to open / green space where they may be deficient. In relation to natural green space, Natural England promote the Accessible Natural Green Space Standard (ANGSt), which states that no person should live more than 300m from the nearest area of natural green space of at least 2ha in size ¹ .

¹ Natural England recommends that people in towns and cities should have:

- accessible natural green space less than 300m (in a straight line) from home
- at least one accessible 20 ha site within 2km of home
- one accessible 100 ha site within 5km of home
- one accessible 500 ha site within 10 km of home
- statutory Local Nature Reserves provided at a minimum level of 1 ha per thousand population

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
71/ 00528	Turley Associates on behalf of Fox Land and Property	The Issues and Options paper sets out the proposed Spatial Vision for the Airedale sub-area to 2026, particularly recognising the role of Keighley as a key centre and its suitability to accommodate substantial growth. This is consistent with the role of the settlement envisaged in the modified RSS and as such the spatial vision is fully supported by my client.
72/ 00200	Yorkshire Water	Yorkshire Water supports the draft Spatial Vision in principle. Locating development in urban areas is more likely to make better use of existing infrastructure. We will be able to make more specific comments on these locations once site specific details are brought forward.
73/ 00529	Dacre, Son & Hartley on behalf of Clays of Addingham	<p>We generally support the overall strategic vision for the District as a whole by 2026, and also the subsidiary visions for the Bradford Urban Area (including Shipley & Lower Baildon) and Airedale.</p> <p>Wharfedale</p> <p>With regard to the vision for Wharfedale and its settlements, we wish to point out some key considerations, which will limit the capacity for further growth, particularly at Burley and Menston. Burley has seen considerable growth in recent years alongside the by-pass and in the redevelopment of Scalebor Park Hospital. The environmental capacity for further growth is limited. At Menston, two phase 2 UDP allocations will be fully developed within the period to 2012 (circa 300 houses). When this level of development is added to that at the adjoining High Royds Hospital (560 dwellings) just inside the Leeds District boundary, the impact on highway and service capacity is a highly material consideration. The scope for further development within the village is very limited. Further extending the village into the wider Green Belt would be damaging in terms of landscape and other environmental considerations.</p> <p>While we agree that there is further scope for the intensification of development in Ilkley, there are constraints within the urban area in relation to traffic congestion and conservation. These constraints and the need for high quality design outcomes, will be limiting factors on the number of dwellings, which can be achieved by intensification. We also agree with the need for a Green Belt review to look at potential urban expansion sites. As recognised by the Council, there are significant environmental constraints, which weigh against expansion to the south (landscape and nature conservation); and to the north (landscape, ecology and flood risk). There are salients of significant development into the Green Belt where boundary revisions, allowing for some in-character intensification might, be considered. Further housing and employment development would be most suitably accommodated to the immediate west and east of the built up area of the town.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
		<p>The spatial vision for Wharfedale implies that the public transport system (especially the rail service) will continue to provide additional passenger capacity throughout the LDF plan period to 2026. This will not be the case without further major investment in platform, rolling stock and signalling capacity. Existing commuter trains and park and ride sites are operating at or near capacity.</p> <p>Addingham</p> <p>The spatial vision for Addingham envisages “limited expansion”. We consider that this village is one of the local service centres, which has land and service capacity to accommodate modest growth. We agree that local facilities should be enhanced to ensure sustainability (para 2.21). Reference is made to better public transport connections and modest growth would help to deliver this and the enhancement of local facilities.</p> <p>Given the considerable limitations on further development in Burley and Menston, and the realistic amount of development which can be achieved in and around Ilkley, a strong case emerges for modest growth in Addingham to provide for local needs housing and market demand in Wharfedale.</p> <p>There is scope to improve the capacity and attractiveness of facilities and public transport in Addingham. The current range of local shops and services is good, but can be further enhanced. We also agree with the need and scope for local employment development to make the settlement more sustainable.</p>
74/ 00530	David Blackburn	<p>No.</p> <ul style="list-style-type: none"> ▪ Housing ‘needs’ are unrealistic. ▪ Written with ‘tinted spectacles’ on e.g. Wharfedale 2026. ▪ Ilkley not a principal town.
76/ 00531	Walker Morris on behalf of Mr & Mrs Hopwood	<p>Bradford City</p> <p>It is agreed that Bradford City Centre will be a major economic driver for the District with the majority of jobs and residential development occurring here. This in conformity with the Draft Revised Regional Spatial Strategy, 2007.</p> <p>It is noted that Bradford City Council submitted comments to the Government Office in response to the Draft Revised RSS regarding the promotion of Bradford to a Regional City. This is also supported as long as the necessary land for houses and jobs is also provided.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Keighley</p> <p>Maintaining Keighley as a key centre is supported along with the intention to locate more housing in the Keighley area. The proposal to expand Keighley's commercial base into digital technologies and the proposal for a new college campus will need to be accompanied by increased housing provision to accommodate the increase in professionals that will move to the area. This will make Keighley far more sustainable and encourage improvements and investment in the centre.</p>
		<p>Specifying Keighley as a Principle Town is fully supported. As shown in the Settlement Study, Keighley has a vast range and number of services and facilities available. These include doctors surgeries (7), dental surgeries (5), pharmacies (10), 113 employers with 10 or more employees, sure start children's centres (3), primary schools (14), secondary schools (3), further and higher education establishments (4), post offices (8), library (1), supermarkets (11), public houses (39), and a number of open spaces (80).</p>
		<p>With regards to public transport provision, Keighley is home to a train station and a high frequency bus route. There is also a good quality cycle network present. This highlights the sustainability of the settlement.</p>
		<p>Paragraph 4.12 suggests that in Keighley, housing will be provided through the development of phase 2 housing sites and safeguarded land, intensification and the major release of Green Belt sites.</p>
		<p>However, this appears to be contradictory to the Council's response to the RRS which explicitly states that Bradford do not want to release any land from the Green Belt and would rather have a sequential approach to the release of land.</p>
		<p>It is therefore suggested that sites are also looked for in surplus open space allocations. The Settlement Study shows that Keighley has a very high proportion of open space provisions compared to the rest of the District. While providing an appropriate amount of open space is obviously necessary for local amenity and health reasons, by re-allocating some surplus urban green space, less land will have to be taken out of the Green Belt. This will be far more acceptable locally. Any planning contributions made for open space provisions as a result of new housing development can then be used to upgrade and improve existing open space.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
77/ 00532	Carter Jonas on behalf of Mr Tony Kemp	<p>Broadly, we would agree with the intentions of the Vision set out in the Issues and Options Further Consultation document.</p> <p>Whilst it is appreciated that the vision for the District covers numerous areas and communities it may be worthwhile considering that the vision for the District as a whole could benefit from being somewhat briefer and more focussed. For example</p> <p style="padding-left: 40px;">“Bradford District will be a vibrant place which retains its distinctiveness and identity, where new development will have a good quality of design, reduces the need to travel and provides opportunities for all”.</p> <p>This could then be utilised to provide a more detailed consideration of the roles and strategies for each of the local areas and settlements.</p>
78/ 00083	Mrs Christine Dale Ilkley Parish Council	<p>No.</p> <ul style="list-style-type: none"> ▪ Infrastructure must precede any further development. ▪ Care for flood plain. ▪ Loss of any green spaces could kill a tourist town.
79/ 00010	Mr Harvey Bosomworth	<p>No. Wharfedale does not have good rail and transport connections, see my enclosed letter. Why no mention of the importance of retaining the character/identity of Burley and Menston. These are small settlements – when much is made of this for Airedale and the Pennine Towns.</p>
80/ 00533`	Turley Associates on behalf of Mr Poolton	<p>Vision</p> <p>We agree that achieving sustainable development should be a principle driving factor behind the Core Strategy and, that development should be promoted in locations, which reduce the need to travel, particularly by car.</p> <p>The vision as proposed appears consistent with the spirit of the Regional Spatial Strategy (RSS) and clearly, a number of key opportunities will need to be sought to accommodate the level of growth required by RSS and effective use will have to be made of finite resources. The level of development required seems likely to require the available and suitable previously developed land resources, as well as further appropriate urban expansion into the Green Belt.</p> <p>We welcome the references to the existing District Centre providing the main focus of retail development outside the Town and City Centres (Para 2.9) and consider that potential development sites, which are accessible to these local hubs of activity and service provision, should be the subjects of specific references in this section. This would help to make it clear that development should be accommodated in areas, which are accessible to such provision.</p>

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Rep ID	Name / Organisation	Summary of Representation
90/ 00541	Mr John Horton	No
91/ 00542	Mr Andrew Mawson, Bingley Branch Labour Party	No. We are concerned that the planned economic development may be over optimistic can the district afford the infrastructure development required?
92/ 00543	Cllr Kathleen Brown, Ilkley Parish Council Planning Committee	No. <ol style="list-style-type: none"> 1) Insufficient land to increase job provision to any extent. Existing residents travel mainly to Leeds 2) Rail and road links already overstretched. Capacity cannot be increased. 3) What is meant by 2.19 "commensurate with a town of this size"?
94/ 00147	Cllr Howard Middleton	Should not be an over emphasis on 'Protecting Green Belt' most Ward 1 in Bradford such as Bolton and Undercliffe have no Green Belt Land. 'Protecting Green Belt' could lead to over development of green space in areas not protected as Green Belt.
95/ 00545	Sue Skinner	<p>Bradford District as a whole - yes in principle</p> <p>Bradford City Centre - yes in principle</p> <p>Airedale - see comments below</p> <p>Generally: Transport considerations do not mention commercial and freight provisions. The increasing number of heavy goods and lighter goods vehicles needs to be addressed. Use of rail transport could also offer some potential with imaginative planning and encouragement.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
		<p><u>Airedale:</u></p> <p>Generally: Road transport links need to be developed in collaboration with plans for Skipton, Crosshills, Cowling and beyond, otherwise traffic congestion will just move outside the Bradford area but still hamper this area's development/future success.</p> <p>2.12 Keighley: Severe road transport congestion plagues the town for increasing periods throughout the day and at weekends (not just rush hours). Better signage and innovative management could help in some areas (eg. There is only road signage, no high level sign to indicate left lane to Keighley town centre on approach to the roundabout by The Beeches/Victoria Park; box junctions could also help here).</p> <p>2.15 Silsden: This village has already been expanded to the point where it is under pressure and appears to be turning into a small town. Care is needed to handle any further housing provision. Rail transport is via a distant station on the edge of Steeton. Provision of a hopper bus to/from Silsden at peak times might encourage more people to travel by train (perhaps with free provision/bookings for those with rail tickets).</p> <p>2.16 Steeton with Eastburn: Parking at the station is under pressure from commuters from further up the line, who drive to Steeton station to benefit from the subsidised fares from here. Co-ordinated rail pricing strategies need to be developed.</p> <p><u>Pennine Towns</u></p> <p>2.22 Haworth: The provision of affordable housing is vital.</p> <p>2.23 Oakworth etc: Some of these centres lack or have endangered health and other public service provisions. Sensitive housing development should take these factors into account and include the provision of suitable multi-purpose community centres etc. where needed.</p>

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Rep ID	Name / Organisation	Summary of Representation
97/ 00546	Yorkshire & Humber Assembly	<p>We therefore welcome the references in paragraphs 1.13- 1.21 which clearly demonstrate the need for general conformity and identification of relevant RSS Policies.</p> <p>Policy YH8 of draft RSS (2005) states that the majority of new development should be focused on the Regional and Sub Regional Centres, sufficient development should be focused at Principal Service Centres in order for them to fulfill their service centre role and limited development should take place in Local Service 3 Centres with a focus on meeting local needs for affordable housing and economic diversification. The document identifies four Spatial Options for the Location of Development. The Assembly would support Options 1, 2, and 3 however; Option 4 would not be in general conformity with Policy YH8 of draft RSS.</p>
98/ 00547	Mr Geoff Best	No. The projections of 2700 dwellings per annum from 2008 to 2026 should be revised downwards. (There is no firm evidence or justification for the state figures) If not, the rose-tinted vision described in part two will not be achieved.
101/ 00550	Anne Knott	Yes. Infrastructures improvements need to be made in semi-rural areas which have been subject to significant development already – unless this is done it will increase the perception that Council Tax is not value for money in these areas.
102/ 00551	Mr Joe Varga	<p>In part.</p> <p>City Centre</p> <p>The Vision for the City centre is good and I agree that successful regeneration will bring confidence to the district. However I would like its importance to be underlined. Realising City centre potential is <u>crucial</u> to improving perceptions of the City and district sufficiently (both internally and within the sub-region, region and nationally) for Bradford to become the choice for investors. As such this area should be afforded the greatest priority.</p>

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Rep ID	Name / Organisation	Summary of Representation
		<p>Airedale</p> <p>Expanding Keighley's commercial base is essential if the town and its surrounding villages are to become more sustainable communities. Although the settlement study identified that about 60% of Keighley's residents travel less than 5km to work it also shows that this trend is reversed in the towns more prosperous outer villages with more people travelling over 5km ("over half" in Haworth, "relatively high proportion" in Oakworth, "70%" in Oxenhope, 53% in East Morton etc). Keighley's current provision, predominantly non-skilled and semi-skilled occupations with a manufacturing bias, does not provide adequate opportunities for its residents.</p> <p>While I recognise that a significant number will always need to travel to the main centres (particularly Leeds but also Bradford) in order to access very highly skilled jobs, support for commercial expansion into service sector jobs generally and also those requiring higher skills will reduce the carbon footprint of the commuting dependant residents of Keighley's outer villages. Such diversification really is required if Keighley is to adequately provide employment for local and <u>surrounding</u> populations in line with RSS policy YH6C1.</p> <p>However I feel the stated digital technologies prescription is risky and could be distracting. While achieving a technology "cluster" in Airedale would be welcomed the pursuit of these aspirations should not prevent support for other developments that diversify the employment base. A lack of support for a wider range of sectors could undermine the RSS policy LCR1E4 to increase employment opportunities in Airedale. Perhaps the sentence ought to be: <i>expanding its commercial base particularly in service and digital technology sectors ?</i></p>

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Rep ID	Name / Organisation	Summary of Representation
		<p>I believe the Vision should include a statement that more explicitly supports retail, service, and leisure expansion in Keighley. These developments are required if Keighley's role as a Principle Town is to be enhanced as outlined in Policies YH6B, LCR1A5 of RSS. Supported by excellent public transport such change will also help redress the current imbalance where local residents spend more money in neighbouring authority centres than their residents do here. Keighley has the potential to develop a more 2 way complimentary relationship with Skipton because of Keighley town centre's ability to more easily accommodate types of retail, service and leisure development that the historic centre of Skipton cannot.</p> <p>Finally I feel the Vision lacks any recognition of the town's character, setting or industrial heritage. These elements appear within the Core Strategy objectives for the district and help create identity and a sense of place. I feel their recognition and a desire to see them enhanced should be carried forward into the Vision. Keighley has continued to loose much of its characteristic urban fabric over the last 20 years to unsympathetic developments with poor design qualities while in neighbouring areas strong local authority support has enabled new uses to be found for many redundant town centre and edge-of-town buildings.</p> <p>Pennine Towns and Villages</p> <p>Haworth</p> <p>Unfortunately I do not see much vision within the Vision for Haworth. There is an acceptance of the unique contribution the village makes to the district and recognition of potential conflicts around future development but nothing that suggests a way forward. I would look at how to secure a wider tourist offer and encourage more over night stays; how to encourage more living and working in the village with live/work units and/or shared office facilities to enable more "home-working", particularly in professional occupations.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
105/ 00011	Bradford Centre Regeneration	<p>No.</p> <p><u>Bradford District as a whole by 2026 (Question 1)</u></p> <p>The description of Bradford District as a whole by 2026 must be stronger. The District is one of the strongest drivers of the sub-region's economy and its success will be critical to the success of the sub-region and the region.</p> <p>The description requires reference to action plans needed to support the laudable ambitions contained in this section; for instance, reference to transport strategies, parking strategies and congestion strategy.</p> <p><u>Bradford City Centre by 2026</u></p> <p>This description would profit from being more aspirational. Bradford City Centre will be <i>the</i> major economic driver of the District. Its enhanced role will be as part of a <i>Regional</i> shopping, cultural, civic and commercial centre <i>with the creation of a new business district</i>.</p> <p>Mention too could be made of the aspiration for better arrival points and parking as part of an overall transport strategy.</p> <p>The City Centre will be the main focus for investment and jobs in the retail and commercial <i>sectors</i>; fuelled by <i>excellent</i> local and sub regional transport links.</p> <p>City Centre living will be encouraged <i>in a series of differentiated urban villages</i> alongside the provision of.....</p> <p>Regeneration of the city centre will be driven by key developments that create new and enhanced public open space spaces, <i>including a landmark City Centre Park</i>.....</p> <p>These initiatives <i>will make Bradford City Centre an even more outstanding place in which to invest, live, work and visit</i>.</p> <p>The policy in place, through the City Centre Design Guide, will achieve high standards of design and quality in new developments to deliver a sustainable regeneration of the city. This must be given a place in the document.</p>

DO YOU AGREE WITH OUR VISION FOR THE DIFFERENT AREAS OF THE DISTRICT?		
Rep ID	Name / Organisation	Summary of Representation
317/ 00076	Highways Agency	<p>The Agency commends the sustainable vision of the Core Strategy. More specifically, the Agency would support the following spatial visions:</p> <ul style="list-style-type: none"> • Ensure the location of facilities encourage the use of sustainable modes over the private car; • Provide housing and commercial development on existing and new transportation infrastructure; • Regenerate existing urban areas in sustainable locations; • An accessible and integrated public transport system to reduce the need to travel to the city centre by car; • Creation of new railway stations at Apperley Bridge, Low Moor, Manningham and Laisterdyke; and Development of high quality bus priority routes. <p>The Agency however, would not support the vision outlined in paragraph 2.9, which states:</p> <p><i>'The area in the vicinity of the M606 motorway will be the focus for commercial development, fully utilising employment land in an area of excellent transport connections'.</i></p> <p>The Agency considers that this area is poorly served by public transport and is difficult to access by cycle and on foot. Consequently, the Agency believes that this policy would have the potential to increase the number of trips on the SRN, many of them being of a relatively short distance. With this in mind, any development proposed along the M606 corridor would need to be fully supported by sustainable transport measures in order to reduce the number of vehicles on the SRN (especially in peak periods).</p>

2. Core Strategy: Further Issues & Options – Responses to Question 2 – The Objectives

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
01/ 00320	Mrs Janet Cuff, Able All Physical Disabled Forum	Disagree
07/ 00020	Bruce Barnes	Agree
17/ 00016	Susan Stead, Bradford Urban Wildlife Group	Yes & No (Some) Do not like the idea of the Bradford District a key component of the Leeds City Region?! Agree with everything about the role of Bradford City Centre – Regeneration – but accept that the Odeon should be conserved and regenerated – also Bradford university and colleges are there to educate not to provide for local business.
21/ 00499	Leeds City Council	Yes
23/ 00045	English Heritage	We support the proposed Objectives to deliver the Vision, particularly those detailed in Paragraph 3.9 which relate to the protection and enhancement of the historic assets of the District and the reinforcement of its local distinctiveness.
24/ 00488	Mr Vincent Shaw Victor Road Community Project	Yes. We will not know until we put the plan into operation
26/ 00500	Hartley Planning consultants on behalf of Mr M Booth	It is agreed that in planning for growth the Spatial Strategy must promote there development of previously developed land. Key issues restricting the provision of new employment land in the Ilkley area are the current planning constraints of landscape designations e.g. Green Belt, Special Protection Area, and environmental constraints eg. washlands. All previously developed land therefore needs to be thoroughly assessed and representations will be made on sites for the Allocations DPD process to ensure their full consideration. An assessment of what is a sustainable location can be a very subjective assessment and such assessments must be balanced against meeting the needs for business and commerce. It is, therefore, also agreed that the Spatial Strategy must ensure that the district's needs for housing, business and commerce are met. Further analysis on this matter with respect to Ilkley is detailed below.

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
34/ 00505	Mr Alvin Norman Friends of Buck Woods	Need more affordable housing for young couples; single people and elderly planning permission should be withheld from proposals for large expensive housing projects. It is essential to keep local distinctiveness of former urban villages such as Idle, Thackley, and Apperley Bridge. Avoid infill developments, which destroys their identity.
36/ 00043	RPS Planning and Development on behalf of Costco Wholesale Ltd.	Agree with the Economy & Jobs Spatial Objectives within Bradford core Strategy. However it is considered that a definition of uses appropriate on employment should be included. The following definition is considered appropriate: <i>“All buildings which are used or designed for purposes within the Use Class B1, B2 and B8 and closely related sui generic uses (such as warehouses, clubs, cash and carry businesses and builders merchants) which are commonly found in industrial estates”.</i>
37/ 00186	Yorkshire Forward	<p><i>The Spatial Strategy – Planning for Growth</i></p> <p>We welcome the objective to promote development in sustainable locations, which would reduce the need to travel and minimises the use of the private car. This objective has the potential to contribute towards the region’s target to reduce greenhouse gas emissions by 20 – 25% by 2016. The Agency would also welcome the objective to promote the role of Bradford City Centre, as this is inline with Yorkshire Forward’s investment in the District and supports Regional Economic Strategy (RES) Objective 6B (i), which seeks to ‘deliver high quality, integrated renaissance programmes in all out major cities and towns’.</p> <p><i>Economy and Jobs</i></p> <p>Yorkshire Forward are supportive of the objective to promote and support a successful economy, by fostering indigenous firms and by attracting inward investment in the high value creative, innovative and knowledge based economies’. As this supports RES Objective 2B, which seeks to ‘grow businesses and employment in knowledge based regional clusters’ and Objective 1C (i), which seeks to ‘attract, retain and embed Foreign Direct Investment in the Region’.</p>

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Environment</p> <p>Objective 5C (ii) of the RES seeks to 'promote energy security and reduced fossil fuel dependency by more energy efficiency and clean and renewable energy generation'. Therefore we welcome bullet three under the environment section of the Strategic Objectives, which seeks to reduce the impact of climate change and promote the use of renewable energy. However it would also be helpful if the vision promoted the use of Combined Heat and Power. This would provide consistency with policy ENV5 of the draft RSS and Objective 5C(ii) of the RES Combined Heat and Power (CHP) schemes have significant potential to reduce greenhouse gas emissions and have been highlighted as a key action within the Regional Energy Infrastructure Strategy (2007).</p> <p>Waste Management</p> <p>We welcome the objective to promote the sustainable management of waste and recycling, however this should include a reference to moving waste up the waste hierarchy. This would improve consistency with RES Objective 5D (i) and (ii) and contribute towards meeting targets laid down through the Waste Strategy 2007.</p>
40/ 00509	Government Office for Yorkshire & Humber	<p>Most of these could relate to anywhere. At the next stage you need to develop more refined spatial objectives tailored to the locality with clear outputs, targets and indicators. You also need to identify areas for joint/partnership working with other agencies and stakeholders.</p> <p>The objectives are set out under old-style plan topic areas, rather than key issues and localities. This is despite the vision being locality based. You need to avoid the core strategy developing into a series of land use based parallel approaches to housing, employment, retailing etc. The core strategy should aim to set out how the key issues identified will be addressed and how the different parts of the District are envisaged as developing in relation to these issues.</p> <p>The objective for Waste Management in paragraph 3.10 will need expanding to address the key issue of providing strategic waste facilities in accordance with PPS10 and the European Waste Directive. You will need a specific objective for strategic waste in the Core Strategy to guide core policies in the Core Strategy and also the Waste DPD. I note that the Waste DPD is not programmed in the LDS for adoption until 2011, so you will need sufficient policy guidance in the Core Strategy to ensure the Council meets the requirements of the European Waste Directive in relation to municipal waste.</p>
42/ 00115	Michael Baldwin	Yes, no changes suggested

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
50/ 00513	Spawforths on behalf of Langtree Artisan	We welcome the objectives contained within the discussion paper, which promotes the role of Bradford City Centre and its role as a regionally significant business, commercial, shopping, civic and cultural area.
51/ 00101	Sanderson Weatherall on behalf of Royal Mail Group Property	Yes
53/ 00515	Mr Peter Boys, Brother Investments (Yorkshire) Ltd	Yes
54/ 00084	Sanderson Weatherall on behalf of Keyland Developments Ltd	Yes. The strategic objectives can be similarly supported.
55/ 00516	Drivers Jonas on behalf of Asda Stores Limited	ASDA are in general support of Strategic Objective 3.6 which outlines the need to: <i>“manage and promote Bradford City Centre’s role as a regionally significant business, commercial, shopping, civic and cultural area.”</i>
57/ 00518	Sanderson Weatherall on behalf of GMI Waterside ShIPLEY Ltd	Yes. It is set out in general terms inevitably, but the importance of Shipley and the World Heritage Site at Saltaire, particularly given the objectives of the Airedale masterplan, are supported.
59/ 00088	Spawforths on behalf of Miller Strategic Land	The objectives seem appropriate and as far as we are concerned there are no omissions. However, we are concerned with regard to the Housing Needs objective, which refers to catering for the needs of current and future residents in a growing District. We consider that this is a vague statement as needs are very wide ranging and can be interpreted in a number of different ways. Furthermore, referring to only the growth of the District does not link or relate to the wider growth of the Region. We suggest that the objective be amended as follows: - To provide a range of quality dwellings in terms of type, and affordability, to cater for the current and future growth of the District and the Region.
61/ 00521	White Young Green on behalf of Mi7 Developments Ltd	WYGP supports the spatial strategy for planning for growth in the District. In particular we fully support the strategic objective to promote the redevelopment of previously developed land in sustainable locations, which will reduce the need to travel and minimise the need to travel by car.

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
		<p>WYGP also fully endorses strategic plan objective of promoting the role of Bradford City Centre, as a regionally significant business, commercial, shopping, civic and cultural area. In particular we agree with Economic strategic objective to support Bradford University and the District's colleges and school in providing well educated, highly skilled and highly paid workforce.</p> <p>However, we believe that further emphasise should be placed on developing a world-class higher education quarter in Bradford, which will act as one of the key drivers to a thriving economy in Bradford District as a whole. We also recommend that one of the strategic objectives for the development for the higher- education quarter should involve the development of a sustainable student village, fulfilling the University and the College's aim of creating an "eco-versity".</p> <p>WYGP also fully supports strategic objective of promoting well being and social cohesion throughout the District by providing good access to homes, jobs, health-care and community facilities to all citizens.</p>
64/ 00523	Dacre, Son & Hartley on behalf of Taylor Wimpey UK Ltd	Yes
65/ 00524	Mrs Lesley Bosomworth	Yes. Very commendable! But doubt very much that they are achievable. For example affordable housing in Burley-in-Wharfedale "the Lawn" has been empty for sometime while developers have been sort to take on the property. Due to lack of funding and no availability of grants for "well off Wharfedale" it look like the end result will be more high priced apartments and not "Affordable" housing for the younger and older members of our community. Transport links in Burley and Menston are very reliant on Leeds-Roads (Apart from the Burley Bypass) are all single track and already clogged up at peak times getting into Leeds and Bradford for work (see Box 1 for comments on rail connections)
66/ 00021	Mr John Grundy	Yes. Greater emphasis on affordable housing is needed. No point in ruining our countryside with lots of houses if few Bradfordians can afford to live in them

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
68/ 00062	Nathaniel Lichfield & Partners on behalf of Hallam Land Management	<p>The following objectives under paragraphs 3.4 'The Spatial Strategy – Planning for Growth' and 3.5 'Housing Needs' are supported:</p> <ul style="list-style-type: none"> • To promote development in sustainable locations that reduces the need to travel and minimises the need to travel by car • To ensure the district's needs for housing, business and commerce are met • To provide a range of quality dwellings in terms of type and affordability, to cater for the current needs and future growth of the District. <p>The role of sustainable urban extension sites in meeting the above objectives should be acknowledged.</p>
70/ 00527	Natural England	<p>Natural England welcomes the strategic objectives. Under the 'Environment' theme we would like to see further strengthening of the role of 'biodiversity assets' in line with key principle 1 (ii) of PPS9: Biodiversity and Geological Conservation, which states that <i>"plan policies and planning decisions should aim to maintain, enhance, restore or add to biodiversity interests"</i>. To this end, the fifth objective under this theme could be altered to something akin to <i>"to safeguard and manage the District's South Pennine Moors Special Protection Area, and to protect and enhance existing, and create new, biodiversity assets, through careful landscape and habitat management"</i>. Seemingly embedded within this objective is recognition of the principle in paragraph 12 of PPS9 that <i>"Local Authorities should aim to maintain networks [of natural habitats] through policies in plans"</i>. Whilst green infrastructure networks are recognised for their value for walking and cycling in an objective, it will also be important to ensure that elements of green infrastructure that may not be publicly accessible, such as wetlands or species rich hedgerows, are also maintained or created to avoid the isolation of important habitats by development. It will, therefore be important to ensure that this principle is reflected in subsequent development policies.</p> <p>In relation to the waste management objective at 3.10 we believe that the objective should aim to move waste up the waste hierarchy, in line with the key planning objectives set out in PPS10: Planning for Sustainable Waste Management. This would mean that the outcome of the objective should be to firstly reduce the need for waste to be generated and secondly to re-use materials. For instance, re-use of buildings can save a great deal of waste. The objective could thus be strengthened to include references to reduction and re-use as well as recycling.</p>

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
71/ 00528	Turley Associates on behalf of Fox Land and Property	The Issues and Options paper proposes a number of strategic objectives including planning for growth by promoting the development of Bradford District as a key component of the Leeds City Region (LCR). The city region approach is an integral part of the modified RSS and we agree it is important that recognition is given to the role of Bradford as part of the LCR. RSS specifically encourages growth in the south of the LCR and seeks to promote development in the Principal Towns.
		A further spatial objective seeks to ensure that adequate provision is made for housing growth in Bradford. It is apparent from the ministerial Statement from baroness Andrews that RSS housing figures are intended to be treated as minimums rather than maximums, and consequently, it is important that the Core Strategy recognises the need to make adequate and robust provision to enable the district to provide sites for at least the RSS housing requirements. The Core Strategy should clearly recognise this and particulate in light of the over-arching Housing Green Paper national growth targets.
		The Core strategy similarly recognised the need to provide a range of quality dwellings in terms of type and affordability, in helping to create sustainable communities and is supported by my client on this basis.
72/ 00200	Yorkshire Water	We support the Strategic Objectives stated. In particular ensuring critical infrastructure is in place to support sustainable growth. Yorkshire Water believes this objective will need to be supported with a relevant policy in either the Core Strategy or Development Policies DPD to ensure implementation of the objective is achieved.
73/ 00529	Dacre, Son & Hartley on behalf of Clays of Addingham	Generally yes but many of them are too broad brush.
74/ 00530	David Blackburn	None of 4 Options sustainable. Transport/community facilities/ environment to supply options impractical and unaffordable as many suffering currently.

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
76/ 00531	Walker Morris on behalf of Mr & Mrs Hopwood	The following objectives are fully supported: <i>(i) Reflecting its scale and location promote the development of Bradford District as a key component of the Leeds City Region</i> <i>(ii) To promote development in sustainable locations that reduces the need to travel and minimises the need to travel by car.</i> <i>(iii) To ensure that the district's needs for housing, business and commerce are met</i> <i>(iv) To provide a range of quality dwellings, in terms of type and affordability, to cater for the current needs and future growth of the District</i>
77/ 00532	Carter Jonas on behalf of Mr Tony Kemp	We would suggest that there are too many objectives set out in this document, which are repetitive and duplicate each other. A number of them are generic national objectives. Overall they could be more focussed towards the spatial strategy and the needs of the District.
78/ 00083	Mrs Christine Dale Ilkley Parish Council	Think that housing should be close to large employment areas. Should ensure all empty housing/mills utilised FIRST.
79/ 00010	Mr Harvey Bosomworth	Yes. Very high level – hard to disagree with.
80/ 00533`	Turley Associates on behalf of Mr Poolton	We would suggest that priority needs to be given to sustainably located development opportunities rather than particularly focusing on “previously developed land especially in sustainable locations”. The ordering and wording of the second and third objectives under Paragraph 3.4 would seem to confuse the real drivers behind the policy approach, and lead to future misinterpretation in subsequent DPD’s, that all brownfield land should be preferred locations for development. This may be counter to achieving the overall vision of sustainable living and development. It also down plays the potential opportunity for Greenfield/Green Belt sites in sustainable locations to be released, to the overall benefit of the development strategy. We would suggest that the second bullet point be deleted, and the third bullet point be amended to include the words “particularly where effective use can be made of previously developed land” at the end of the current drafting. Whilst we are generally of the view that the strategic objectives could do with enhanced focus and should be condensed – if the desire is for the objectives to set a more full context, it would seem appropriate to include further objectives for housing needs.

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
		<p>We would suggest that appropriate additional objectives could include the following points:</p> <ul style="list-style-type: none"> ▪ Accommodating, as a minimum, the RSS housing requirements and exceeding these where appropriate (in line with the recent ministerial clarification on this point) ▪ Providing adequate allocated land to achieve this into the future, which is outside the Green Belt, in order to protect its permanence and ensure that a comprehensive Green Belt Review is undertaken through an alternative DPD. ▪ Ensuring that a deliverable supply of housing land is permanently secured and appropriately monitored for release. ▪ Ensuring that a deliverable supply of housing land is permanently secured and appropriately monitored for release. ▪ Ensuring that the identified housing land is capable of release in a flexible manner. <p>These are all key elements of the Government approach to securing housing and should be reflected in the core strategy to ensure that the expression of this policy is appropriately secured in subsequent DPD's.</p>
82/ 00087	Metro	<p>We think that one of the objectives under Economy and Jobs should be to ensure "all new employment development above (a certain size, e.g. 10 employees) takes place in accessible locations in accordance with RSS guidelines).</p> <p>Under Transport and Accessibility we think there should be an additional objective to "Develop land use patterns that result in sustainable transport movements".</p>
90/ 00541	Mr John Horton	No
91/ 00542	Mr Andrew Mawson, Bingley Branch Labour Party	Yes. No amendments but are concerned about achievability.
92/ 00543	Cllr Kathleen Brown, Ilkley Parish Council Planning Committee	No. From the point of view of Ilkley – cannot be met. As well as rail and road, the schools are full to burst. All infrastructure required should be considered first.
95/ 00545	Sue Skinner	Yes, with the following provisos. Can these objectives aid the delivery of the Vision? Do you suggest any amendments?

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
		<p>3.4 The Spatial Strategy - Planning for Growth It is important that Bradford and District is not seen just as a feeder area for Leeds.</p> <p>3.7 Transport and Accessibility The provision of passenger rail transport is already inadequate. This needs more capacity and collaboration with local bus providers (for example: there is often insufficient time to walk between the rail and bus stations at Keighley to catch potentially linking services). This problem may exist elsewhere). Also, there is no mention of any rail developments for commercial and freight traffic being considered/encouraged to ease pressure on road transport. Could the Keighley and Worth Valley rail line be developed as a commuter service? This happens in other parts of the UK.</p> <p>3.9 Environment Should the provision of local employment be added to the provision of opportunities for leisure and recreation? Often the latter can provide job opportunities.</p> <p>3.10 Waste Management What is the potential for incineration as a source of local heating etc. (CHP)? Should a local facility be investigated/provided? Is the collection of waste cooking oil from commercial outlets for processing being considered? Are there any plans for plastic collection/recycling and/or incineration?</p>
98/ 00547	Mr Geoff Best	No. Much more detail is required, especially with regards to infrastructure. For example in the Wharfe Valley extensive road buildings would be required to cope with the increase in traffic a by pass for Ilkley would be needed to take through traffic off the already congested A65 plus improvements to other routes.
101/ 00550	Anne Knott	Yes. Re: previous comments – social cohesion will be seriously damaged. Facilities need to be in place before any further development. Rural areas often have less usable green spare than inner cities

DO YOU AGREE WITH THE OBJECTIVES?		
Rep ID	Name / Organisation	Summary of Representation
102/ 00551	Mr Joe Varga	In part. Economy and Jobs I would like to see a point regarding the expansion and diversification of employment opportunities within Airedale, centred on Shipley and Keighley.
		Transport and Accessibility I would like to see a point regarding improving conditions for safe cycling and walking for transport. This could include new developments that relate better to existing areas allowing these anti-obesity and non-polluting forms of transport to be better exploited.
		Environment A caveat should be added regarding the promotion of renewable energy along the lines of <i>in suitable locations</i> because while this resource should be exploited within the district there will be some sensitive locations that should be protected from the visual intrusion of these developments, e.g. views surrounding Top Withens.
		I would like to see a general point regarding the sustainable use of all resources.
105/ 00011	Bradford Centre Regeneration	Yes
317/ 00076	Highways Agency	The Agency recognises the Council's objectives in relation to transport as: <ul style="list-style-type: none"> 1. To improve public transport and highways, by ensuring safety, efficiency, sustainability and accessibility; 2. To provide better transport connections within the District and with other parts of the Leeds City Region and the country; 3. To improve access to housing, employment, shopping, cultural facilities, health and education provision.
		In principle, the Agency would support these objectives and any policy that seeks to reduce the need to travel <i>and</i> prioritise sustainable / public modes of transport to encourage a modal shift from the private car. It is considered that such policies will be critical in reducing the number of vehicular trips on both the local road network and the SRN.

3. Core Strategy: Further Issues & Options – Responses to Question 3 – Spatial Option

WHAT IS YOUR PREFERRED SPATIAL OPTION?		
Rep ID	Name / Organisation	Summary of Representation
01/ 00320	Mrs Janet Cuff, Able All Physical Disabled Forum	Option 4
07/ 00020	Bruce Barnes	Option 1 Residential areas outside of the Bradford City Centre area should be considered for limited growth in terms of small business developments.
08/ 00110	The Land and Development Practice, on behalf of West Register Realisations Ltd	Option 1 advocates that the majority of all new housing within the authority should be directed to the Sub Regional City with only a small proportion going to the principal towns and an even smaller proportion going to areas defined as local centres. i) Land within and around the City is in demand for other development such as employment, retail and leisure. It is therefore our view that it is necessary to strike a balance between these competing land uses. ii) In order to provide such a high percentage of the housing requirement within around the Sub Regional City it will invariably require developments to be at a high density, which will not be in the interest of the proper planning of the area, particularly in locations on the periphery of the City. iii) Such a high level of new housing development in the Sub Regional City will also place an unreasonable burden on services, facilities and infrastructure in the City. iv) This option will not provide a proper distribution or mix of housing in a sustainable manner and therefore it will not meet the needs of the community or the housing market.

		<p>Conversely, many of the principal and Local Centres are highly accessible and offer a good range of services and facilities such as Queensbury. However, to remain viable communities, these accessible towns and villages need new development. A prime example of this is the fact that many secondary and primary schools are experiencing falling rolls. A more balanced distribution of the housing requirement will help sustain existing local facilities such as schools which are often at the heart of the community life and at the same time it would not require additional new facilities in the Sub Regional City. As such Option 1 does not fully recognise the potential of these locations to accommodate housing growth in a sustainable manner, which will also ease pressure in areas further up the hierarchy.</p> <p>It is therefore not considered that Option 1 is suitable for delivering the proper distribution of the RSS housing requirement for the district.</p>
		<p>Option 2 promotes a more balanced distribution of housing within the district.</p> <p>It recognises that there is an insufficient quantity of brownfield land to accommodate the entire provision and that green belt release will be necessary. This is an evitable consequence of seeking to accommodate such a large housing requirement, but is often a better solution than attempting to cram development into Sub Regional Cities, which could result in the merger of urban areas, poor design and an adverse impact on services, facilities and infrastructure.</p> <p>It is considered that Option 2 is a more realistic strategy than Option 1 in that it better provides for the controlled and sustainable growth of the district and will help to sustain community facilities and community life.</p>
		<p>Option 3 takes the principles set out in Option 1 to an extreme, with 70% of the district's housing being proposed within the Sub Regional City. For the same reasons as those provided in respect of Option 1, Option 3 is not considered to be a suitable overall solution to the district's housing requirement in that it places far too much pressure upon the services and facilities in the Sub Regional City at the expense of similar services in other substantial settlements, but which are lower down the settlement hierarchy.</p>

		<p>Option 4 sets out a more distributed pattern of growth within the District. Unlike the other three options, Option 4 identifies several "Local Growth Centres", amongst which Queensbury is included.</p> <p>The Local Growth Centres are all capable of providing sustainable housing development as they have been selected based upon their location and accessibility to existing transport corridors, facilities and employment opportunities. In these locations, existing facilities will benefit from further growth in that new development will help to sustain the services already in place. The provision of Local Growth Centres will allow for, amongst other matters, lower density family housing development to occur in appropriate locations and ease pressure to provide such a significant volume of development within the Sub Regional City.</p> <p>Option 4 is considered to be a robust strategy, although we still feel that the proportion of the projected growth directed to the Sub Regional City is too high and although we note that 10% of the housing growth is to be directed to the Principal Towns, this could be more and similarly the local growth centres and local centres could also take a high share of the housing requirement so that undue enhance is not placed upon the Sub Regional City and the services, facilities and infrastructure within it.</p> <p>In summary we agree that he Sub Regional City should provide for the majority of the housing growth, but this should not be at the expense of the form and pattern of the city or its living environment and the service and facilities within it. We feel that a more even distribution should be provided, such as that proposed in option 4, in order to spread the burden of growth. Promoting a number of locations for housing growth across the whole district will also ensure that new housing is delivered to meet local needs in a sustainable manner and at the same time provided a wide range and chose of house types in order to fulfil the range of needs that exist. As a consequence is it our view that option 4, as modified, will reduce the reliance on the Sub Regional City and offers the best spatial strategy for the distribution of housing.</p>
14/ 00494	Richard Kunz	<p>I feel option 3 is best for the district. By concentrating development with-in established city/towns with their supporting infrastructure and transport links will serve the estimated population growth best.</p> <p>The Aire valley is becoming more and more congested leaving no de-markation between towns resulting in loss of identity. Bingley for example has grown out of all proportion over the last 5 years but with next to nothing provided in the way of new schools, shopping facilities, recreation etc. The town will revert back to pre-bypass days due to saturation of local rural roads not even designed for today's traffic.</p>

21/ 00499	Robin Coghlan, Leeds City Council	<p>Option 1.</p> <p>All options involve considerable housing growth including green belt releases, but Option 1 does not incorporate the major green belt releases close to the administrative boundary with Leeds and apportions least growth the local centres which include Menston & Burley & Wharfedale close to the boundary with Leeds.</p>
		<p>Leeds City Council objects to the major green belt releases suggested in all of the Options. Significant housing growth will reduce the gap between Leeds & Bradford leading toward coalescence of settlement. The countryside will be encroached upon and the setting of historic towns & villages could be compromised. The development of green belt land could lead to investment in new housing being diverted from urban sites thereby undermining regeneration of the main urban areas. As such, all of the options would reduce the value of the green belt between Leeds & Bradford & would be contrary to national planning guidance PPG2 on Green Belts.</p>
		<p>Leeds City Council also objects to significant housing growth in the form of the urban extension beyond Holmewood and new settlement at Esholt in Options 3 & 4 because it is not apparent that public transport infrastructure could be sufficiently improved to avoid the generation of significant traffic growth on roads into Leeds. In particular, the housing growth at Esholt will exacerbate congestion at the major junction at Greengates - caused by housing development at Apperley Bridge & Vale - which needs infrastructure improvements works now to improve the flow of traffic.</p>
		<p>Leeds City Council also objects to the apportionment of 20% of housing growth to local growth centres in Options 2 & 4. The local centres include Menston & Burley in Wharfedale and the effects of housing growth in these settlements will be felt over the boundary in Leeds in terms of increased traffic.</p>

22/ 00152	Councillor Roger L'Aime	<p>I am assuming that the options in the documents are starting points and that the final LDF will be a hybrid of them. Any consideration of the options has to take a view of the future roll of the constituent parts of the district and how the nation's economy may progress in the future.</p> <p>The switch from a manufacturing to a service economy that has taken place over the last fifty years may well have run its' course.. Any solution that does not take into account that there might be a higher than predicted requirement for at least light industry in the area may well be flawed. Provision of adequate land for employment must have at least as high a priority as housing.</p> <p>To a degree Bradford is an area of two halves, the old Bradford City and the Aire and Wharfe Dale regions that were added in 1974. These latter areas have two possible futures either as part of an integrated Bradford or as dormitory towns to Leeds. A problem that I have is that regeneration of the Aire Valley (Skipton – Kirkstall) could be achieved quite independently of what happens to central and south Bradford. In a sense the future of the northern part of the district is more secure than the south in that it has two engines driving it, the present boom in Leeds and the regeneration of traditional Bradford.</p> <p>Option 1 RSS Settlement Hierarchy</p> <p>This option has the advantage of concentrating development around a limited number of existing centers. This would have the advantage of facilitating increased use of public transport in particular rail.</p> <p>Option 2 Continuation of RUDP Strategy</p> <p>This shares many of the advantages of option 1 with the added advantage of having a readily been subject to intensive consideration and review.</p> <p>Option 3 Focused Growth points Around Bradford Sub City Region</p> <p>This solution over emphasises development in old Bradford. In practice it could be over dependent on peoples willingness to accept city centre living. It could also have adverse effects on Aire Valley Regeneration.</p> <p>Option 4 Dispersed Growth Points</p> <p>It could be difficult to provide adequate public transport for a more diffused pattern of development. The planned level of development could damage some or all of the local centers involved. This seems to be a spread the misery option</p>
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		<p>Given the importance of living in the world as you expect it to be rather than as you want it to be I would make the following preferences.</p> <ul style="list-style-type: none"> ▪ Options 1 and 2 seem the most achievable. The final solution may well be a hybrid of the two. ▪ Option 4 would be my least preferred solution. <p>While the predict and provide approach to planning may no longer be either practical or desirable a good plan should try to meet the public's desires rather than the planners conception of what they feel is good for the public</p>
23/ 00045	English Heritage	<p>Proposed Options – General</p> <p>Whilst it is accepted that Bradford should be the focus for the majority of development, the strategy needs to ensure that development and redevelopment proposals within the Shipley area will not have an adverse impact upon the character or setting of the World Heritage Site at Saltaire.</p> <p>A large number of the settlements being proposed as Principal Towns, Local Growth Centres and Local Service Centres have historic cores which have been designated by the Council as Conservation Areas. Most also contain several Listed Buildings. In view of the recognition within the Vision of the importance of a high quality environment to the future wellbeing of the District, the procedure for selecting settlements for potential development should include an assessment of the capacity of each of those settlements to accommodate further growth without compromising either their historic character or their wider landscape setting. The latter is especially important given the topography of the District and the relationship of its settlements to the landscape.</p> <p>Option 1</p> <p>We are concerned about the impact which “intensification” might have upon the character of the Ilkley . Any such proposals will need to be justified against the analysis of the character of the town as detailed in the Conservation Area Appraisal.</p> <p>Option 2</p> <p>We are concerned about the impact which “intensification” might have upon the character of the Ilkley . Any such proposals will need to be justified against the analysis of the character of the town as detailed in the Conservation Area Appraisal</p> <p>Identifying Bingley as a Principal Town is likely to increase the amount of traffic and congestion along the A650. This could have an adverse impact upon the character and setting of the World Heritage Site at Saltaire</p>

		<p>Option 3 & Option 4</p> <p>Esholt is an attractive village in the Aire Valley. The whole village (and a substantial area of open space around its built-up area) is included within its Conservation Area. The settlement includes a number of Listed Buildings. Given the character of this area, it is not entirely clear where a Growth Point might be located such that it did not detract from the character or landscape setting of Esholt or which would compromise the separation of the main built-up area of north-eastern Bradford with the settlements of Guiseley and Yeadon to the east.</p>
		<p>Table 1</p> <p>In view of the recognition of the importance of a high quality environment to the future wellbeing of the District, one might have expected at least a general indication of how sustainable each of the Options is considered to be in terms of the impact upon the built and natural heritage of the District.</p>
24/00488	Mr Vincent Shaw Victor Road Community Project	Option 3

26/ 00500	Hartley Planning consultants on behalf of Mr M Booth	<p>All the spatial options are silent on the future role of Ilkley in providing for future employment growth. It is considered that Ilkley must be identified as an employment growth area to ensure a sustainable settlement i.e. a place in which to live and work.</p> <p>The underlying assumption running throughout all four spatial options is that Ilkley is to remain a commuter town. This approach is not sustainable. It is acknowledged in the Settlement Study that over 57% of the population travel over 5km to work; this is already an unacceptably high figure and is not one that should be increased further. Ilkley is identified as a Principal Centre and the options are proposing a percentage allocation of between 10% and 30% of the housing requirement to primarily this town and Keighley (only Option 2 adds Bingley to this list of Principal Centres). There is therefore an acceptance here of significant housing growth in Ilkley through intensification and major green belt releases. However, there is no corresponding and required acceptance of the need to sustainably locate housing growth next to employment growth. All options will simply lead to a significant and on going increase in the percentage of the Ilkley population traveling to work over ever increasing distances in excess of 5km.</p> <p>The proposed continued intensification of housing development on land in Ilkley will only serve to diminish further the availability of employment land or employment purposes (see below for reference to paucity of existing supply) and this will exacerbate the role of the town as an unsustainable commuter settlement.</p> <p>The town does have good rail connections but this service should not be the defining reason for constraining employment growth. The carbon footprint of commuters will grow significantly as a consequence of all the spatial options; the true objective must be to reduce distances travelled to work (by car and by public transport).</p> <p>PPS1 qualifies that the Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both rural and urban areas. PPS1 clearly states that planning authorities should: "Ensure that plans are drawn up over appropriate time scales, and do not focus on the short term or ignore long term impacts and the needs of communities in the future." It is considered very short sighted to unnecessarily constrain employment growth in Ilkley.</p>
28/ 00501	Ray Wilkes	I think of the 4 options presented we should not select any but try to keep our options open so that we can pick and mix as the future develops. We should0 try to ensure all are possible, nut not be committed to any.
29/ 00074	Councillor Chris Greaves	I do not accept the need for, or the deliverability of, the level of housing proposed. The Market will decide on the levels of build. Present levels are circa 1500 units pa, and there is no reason to assume that 2700 units pa will be built.

		<p>It is wrong to separate Ilkley from our other villages in Wharfedale – Addingham, Burley and Menston. The reality is that they all use the same infrastructure, and must be viewed as one. The valley must be treated as one entity, and any development in the valley examined holistically.</p> <p>The effects of future development in Leeds, especially on the A65 and A6030/A660 corridors must be factored into any proposal.</p> <p>Some assumptions are flawed. In particular the belief that the Wharfe Valley has good transport links. This is not the case, as the road network is gridlocked at peak times, and the rail network has insufficient capacity.</p> <p>The Wharfe Valley could not cope with any major development unless both the road and rail networks were significantly upgraded before the development took place.</p> <p>However, even if central Government funded the transport infrastructure required the Valley is not a sustainable location for the housing.</p> <ul style="list-style-type: none"> ▪ There is no significant industry to keep new residents working within the valley or within a 5km travel distance. ▪ The major employment expansion areas in Bradford appear to be in either Airedale or south or west of the city where train travel and because of the road congestion, increasingly travel by any other mode of transport is not a viable option for Wharfedale residents. <p>Schooling. Particularly secondary schooling, is already a serious problem. Ilkley Grammar School is full, and there is no space there for further increase in size. At Menston children use Guiseley School, but the development presently taking place in and around Guiseley will soon take up all the capacity there.</p> <p>I accept the Valley can cope with a minor increase, say 5%. However, anything beyond that would cause huge stresses.</p>
34/ 00505	Mr Alvin Norman Friends of Buck Woods	<p>Combination. Mainly option 2 but with elements of 3 and 4. Greater development in Keighley, Ilkley and Bingley plus expansion in Silsden, Steeton, Thornton and Queensbury. Holmewood is prime area for expansion with its proximity to M606, M62. Esholt: should make clear this is not Esholt Village but include Apperley Bridge, Thorpe Edge. Development should be avoided here to maintain green corridor along Aire Valley and avoid compartmentalisation of wildlife communities. Industry should be encouraged to use brown field sites not pleasant green field.</p>

37/ 00186	Yorkshire Forward	<p>When considering the spatial options for development in the Bradford District we would support an approach that provides for a sustainable pattern of growth, by focusing development in the main urban areas. We would therefore particularly support option 3, to focus 70% of development in Sub Regional City of Bradford, as this offers the most sustainable pattern of growth, whilst supporting RES Objective 6B (i), which seeks to ‘deliver high quality integrated renaissance programmes in all our major sites and towns’.</p> <p>It may be helpful for the Council to consider how the provision of housing throughout the District will support a similar spatial distribution of employment land. According to work carried out by Arup to inform the Regional Spatial Strategy (RES) Proposed Changes, Bradford has enough B1 b/c, B2 and B8 land allocated to cover the predicted need of 160ha between 2006 and 2021. However when considering the distribution of housing the predicted 72.4ha of B1a land needed until 2021 will need to be considered in terms of the need to locate B1a in town centres based on sequentially preferable sites and to line up the level of housing and employment land distribution throughout different part of the district. A pattern of development that distributes employment land and housing in line with each other has the potential to reduce the need to travel and therefore could contribute towards meeting the region’s target to reduce greenhouse gas emissions by 20 – 25% by 2016.</p>
38/ 00507	Dale Cordingley	<p>The four ‘options’ in the Core Strategy all show employment growth areas within the Aire valley and to the east of the city. Yet the proposals also suggest significant housing growth away from these areas, particularly in Wharfedale where a disproportionate number of houses are proposed compared to other areas (up to a 41% increase).</p> <p>This would be contrary to the objectives stated in 3.4, where it says “To promote development in sustainable locations that reduces the need to travel and minimises the need to travel by car.” All four options of the Core Strategy would have the effect of massively increasing Wharfedale commuting to and from work, much of it by car, whether it is to Bradford or Leeds. Fundamentally the Core Strategy proposes a dissipation of a significant amount of housing away from the employment centres in to other locations. This shows a total disregard for the impact on people’s daily commute and the significant impact on carbon emissions that will result.</p>

		<p>Lack of joined up thinking</p> <p>The Wharfe valley towns and villages cannot be treated in isolation as proposed in the LDF. The centres of population need to be seen in total, as population increases in any of the locations will have significant knock on effects on the others.</p> <p>Leeds & Bradford appear to be acting in isolation. The massive growth in Guiseley, including additional housing in the pipeline from High Royds, Crompton Parkinson, Moons, Silver Cross, plus proposed developments in Menston at Bingley Road and Derry Hill are or will place significant stress on the current infrastructure. Yet the Core Strategy demonstrates that there is a lack of consideration being given to this bigger picture.</p> <hr/> <p>Roads</p> <p>The A65 (Ilkley/Leeds), A660 (Ilkley/Leeds) and A6038 (Guiseley/Bradford) are all gridlocked at peak commuting times, creating harmful pollution. The roads in to Leeds are very heavily used and will get worse. More housing is currently being built or planned to be built in Lower Baildon and Shipley. This is adding to the significant congestion currently experienced most of the day for people travelling to Bradford.</p> <hr/> <p>Rail</p> <p>Whilst there is a rail link in Wharfedale, this should not be confused with good transport facilities. The trains are overcrowded at peak times and residents from local settlements are more frequently work their way up the valley to catch a train i.e. they actually drive in the opposite direction to a station where they can park and get on to the train. This creates additional traffic, pollution and demonstrates an inadequate facility.</p> <p>It is also apparent from enquiries, that Leeds station (Leeds is the main destination for most residents) is unable to cope with additional train movements, even following the recent multi million pound investment in the station. Adding more carriages does not appear to be an answer as there are limitations on platform lengths and the cost of adding just one carriage to the current trains is said to be over £8m p.a. and whilst this would improve current problems, it would not address the issue in the medium to long term.</p> <hr/> <p>Buses</p> <p>Buses are considered uncomfortable, unreliable and slow and therefore many people will not willingly use them. The roads in Wharfedale, into Bradford and Leeds are not wide enough for bus lanes in most places, so other solutions are required to move large numbers of people quickly, comfortably and economically. This really leads to either improved train services or trams/light railways, but the investment required is unlikely to find adequate funding or be sustainable for the Wharfe valley.</p>
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Schools

The secondary schools are inadequate in the Wharfe valley for current needs, let alone any further growth. Children from Addingham are now starting to be allocated to schools in Keighley rather than Ilkley. Menston children have not had access to Ilkley schools for some time and have had to go to Guiseley School. As the Guiseley population grows with the current developments, this option will disappear too and squeeze Menston still further. It would appear from the Core Strategy that the out of district education, along with the associated commutes (bus and car journeys) will accelerate under the proposed plans, as little or no thought seems to have gone in to this subject. All of this will also place further demands and stress on the infrastructure and heavy investment demands.

Health care

The hospitals in the area have been closed, with the exception of Otley, which has been downgraded. This means that people have to be transported some distance to get to these necessary facilities and in addition visitors create emissions and are inconvenienced as a result of the travel.

Infrastructure in General

The location of any developments and the required infrastructure will need planning at a very early stage to ensure sustainability. By locating the residential areas close to the employment locations, walking and cycle routes could also be incorporated in to the plans. However, it would be foolish to make this issue worse by building even more houses away from where people will work.

Significant Government funding will be required for the infrastructure elements of the plan, for without it the plan cannot work. It would be foolhardy to say the least to allow residential development and assume that the rest would 'come out in the wash' as appears to be the current approach. It won't.

Impact on Wharfedale

From the preceding sections it is clear that the impact on Lower Wharfedale would be near catastrophic if any of the 'options' were adopted. The green spaces that we all appreciate would disappear in many areas as the Green Belt was eaten away by housing and roads. The traffic congestion would increase significantly, as would the rail overcrowding. Access to Leeds and Bradford would be almost impossible, with the inevitable consequence that people would not move in to the district and others would move away.

Industry has moved out of Wharfedale and is unlikely to move back due to the high price of land and the inadequate infrastructure. As a result employment commuting will continue to be in to Leeds and to a lesser extent Bradford.

39/ 00508	Barton Wilmore on behalf of Wain Homes Ltd.	<p>Option 1</p> <p>The name of the 'RSS Settlement Hierarchy Option' implies that Option 1 is the only option which complies with the RSS, if this is in fact the only option which is in accordance with the RSS then the other options are not in fact real options, because the LDF must take into account the guidance provided at regional level. For clarity further guidance must be provided on this point, and we suggest that the option is renamed.</p> <hr/> <p>Option 1. Queensbury is defined as a Local Service Centre, along with settlements such as Cullingworth, Harden and Wilsden. These settlements along with other smaller settlements that are defined as a Local Service Centre are considerably smaller, and offer a much inferior number and choice of services, employment opportunities and public transport links than the larger such as Queensbury. Given that there is a wide difference between the smaller settlements as listed here and those larger settlements such as Queensbury, it is considered that there must be another layer added to the settlement hierarchy to further reflect the size and importance of these settlements defined as Local Service Centres.</p> <hr/> <p>Option 1 apportions 30% of the housing requirement to the two Principal Centres of Ilkley and Keighley. Para 4.12 states that the housing development through this option would be provided partly through the major release of Green Belt land, yet Table 1 acknowledges that the available green belt land around Keighley and Ilkley may not be suitable for housing given environmental constraints such as flood risk, topography and Special Protection Areas. Ultimately the constraints of the green belt land, will restrict the amount of housing that can be delivered in Keighley and Ilkley.</p> <hr/> <p>Option 2 – The name of this option suggests that this Option is a continuation of the old guidance, therefore we suggest that direction is given as to whether this option conforms to the RSS</p> <p>Whilst option 2 differentiates between the most important Local Service Centres, this is not formalised through the proposed hierarchy. If the more important Local service Centres were apportioned their own level of growth, this would help to ensure that development was directed into the most sustainable locations.</p> <hr/> <p>Option 2 – We are also concerned that this option continues to allocate 30% of the housing requirement to the two principal centres of Ilkley and Keighley, as stated previously this is not considered to be appropriate given that this is reliant upon major green belt land release in areas of environmental sensitivity.</p> <p>Our client does however welcome the allocation of areas to the south and east of Bradford as areas of potential employment growth, as from this area of the city the motorway connections are most easily accessed, and from these locations the proximity to Leeds can be taken advantage of in terms of attracting new businesses.</p>
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		<p>Option 3. As previously states some of the settlements defined as Local Service Centres are sustainable locations which benefit from good public transport links, a range of services and a good local retail offer. As such, we considered that greater emphasis should be placed on these locations for development, the allocation of 10% if the housing requirement does not allow for the potential of these settlements to be used in order to meet the total housing requirement.</p> <p>Option 4. Our client supports the extra layer within the settlement hierarchy which differentiates between the importance of the larger settlements such as Queensbury and Bingley, and the much smaller settlements such as Harden and Wilsden. As mentioned earlier this is important in order to apportion a larger rate of growth to those smaller settlements which are sustainable locations for development.</p> <p>Option 4. Whilst the housing requirement split apportions the highest percentage to the areas in and around the Sub Regional City, and the least to the Local Service Centres, this option relies less on the principal towns. This means that less of the environmentally sensitive green belt will have to be released, and that growth will instead be located within Local Growth Centres, such as Queensbury, which are highly sustainable locations for development.</p> <p>Option 4. Our client considers that where Local service Centres are not in a good location for business, some employment land should be included in the types of land listed at Para. 4.39, upon which housing would come forward.</p>
40/ 00509	Government Office for Yorkshire & Humber	<p>The spatial options should cover more than the location of development and should relate clearly to the key issues, vision and strategic objectives trail. If, for example, housing growth and social inclusion are the key issues for the District, then these need to be up-front in the vision and objectives, although the spatial strategy will also need to address the other key issues. The core strategy should also try to avoid setting out a settlement hierarchy as the spatial strategy; it should be more than this in that it should set out how the Council plans to deal with all the key issues identified in the different parts of the District, not just land uses.</p> <p>The options should be realistic and take into account the constraints placed upon them by factors including national and regional planning policy, local issues and resource availability. For example, options will not be sound if they are not in general conformity with RSS and so will not be realistic options that should be progressed. Also, consideration can be given to options within options. Realistic options will also require the identification of where other stakeholders will need to take action.</p>
42/ 00115	Michael Baldwin	None of the options are preferred. We do not think that the projected growth of 50,000 homes is sustainable, and the impact of any of the options is unacceptable. We want to limit housing growth to within sustainable limits.

44/ 00255	Menston Association Community	<p>THE OPTIONS ON OFFER</p> <p>The current options suggest a further 4000 to 5500 homes (<i>see notes below</i>) in Wharfedale, a significant increase on the existing housing stock of about 13500 properties, from Addingham to Menston. This represents an increase of 30% to greater than 40% increase in current housing stock. Even the best selection of Options gives an increase of 2000 properties or 15% increase in housing. This is of course well above the increases in Bradford as a whole. To justify this on a reasonable SUSTAINABLE basis there has to be suitable employment growth comparatively easy to access for these additional Wharfedale residents.</p> <p>Unfortunately these issues have not been addressed in the draft Core Strategy Documents.</p> <p>No one appeared to recognise the very severe congestion that exists now on the trains and roads from Lower Wharfedale to the major employment centres of Leeds and Bradford. It follows that there had been no serious evaluation on what can or cannot be done to increase road and rail capacities after taking account of geography, existing limitations due to existing development and financial implications. Any solution looks very expensive and so has to be firmly planned now, not on an ad hoc basis as developments take place.</p> <p>Road infrastructure into Leeds and Bradford via Shipley is already at capacity and is threatened to worsen when all the new developments within Leeds at Guiseley, including the extensive sites at Crompton Parkinson and Silver Cross, are complete, together with further significant housing plans about Otley the 600 houses at High Royds and within Bradford the 400 houses at Bingley Road and Derry Hill, Menston.</p> <p>Trains into Leeds are already at capacity into Leeds where most of the jobs are, with already passengers from Guiseley driving to Menston to get on early morning trains</p> <p>Increasing trains into Leeds in the rush hour is currently not possible despite recent extensions to the station. Extending train lengths to 5 carriages, with the need to extend platforms, would hardly cope with recent trend increases in passengers over the next five years without additional housing in Lower Wharfedale/Guiseley/Otley. Additionally the cost of £8m a year for 30 years to achieve this increase would have to be funded by Government Agencies as the amount is far in excess of that obtainable out of developers</p> <p>Bus priority routes not an option on any of the routes into Leeds or Bradford from Wharfedale due to road width problems on significant sections of these routes.</p> <p>Lower Wharfedale has no significant industry to keep new residents working within the valley and land prices and shortage of suitable sites ensures this will remain the case so people have long and time consuming journeys to commute to jobs. Indeed the employment prospects in the area has been significantly reduced in recent years by the loss of the Hospitals at Menston and Burley, and industry including Garnetts in Otley, Silver Cross, and Crompton Parkinson in Guiseley.</p>
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		<p>All major employment expansion in Bradford appears to be in either Airedale or south or west of the city where train travel and, because of road congestion, increasingly by any other mode of transport, is not an option for Wharfedale residents. Menston itself has very little employment in the village so most residents have to travel significant distances to work.. Because of lack of space and land values this situation is unlikely to change.</p>
		<p>Schooling, particularly secondary schooling, is becoming a serious problem with all the new developments in Leeds nearer Fieldhead School, the normal school option for Menston school children, together with no additional capacity on the already full Ilkley Grammar School site and the Otley School –Prince Henrys- full for Menston children. Any further building in Lower Wharfedale must follow additional School places in Wharfedale either by Bradford or Leeds Metropolitan Authorities.</p>
		<p>Space for housing growth can almost certainly be found, however it will be predominately on Green Belt land away from shopping and public transport centres, that certainly will be a problem for older people who wish to move into new apartments or young families into affordable housing or other residential accommodation.</p>
		<p>Menston is already short of Recreational Open Space and Playing Fields for the population. A situation that will only be made worse by the developments at Bingley Road and Derry Hill. Only minimal village Green space exists in the village and no Allotments.</p>
		<p>Menston has undoubtedly serious runoff and drainage problems from the Moor that need resolving. There is also the question of whether the existing Sewage and Drainage infrastructure in the village is capable of handling significant increases in village housing.</p>
		<p>Currently none of the Options or indeed combination of elements from the Options are sustainable due to lack of additional employment in locations that are practical for Wharfedale residents to travel to. Indeed to be sustainable in the long term new housing should be only permitted next to and easily accessible to growth employment areas, a Government objective and consistent with para 3.4 – “Further Issues and Options for Consultation”</p>
45/ 00081	Ilkley Civic Society	<p>Ilkley Civic Society members are not able to give a preference for any of the options proposed by Bradford Council because the implications for Ilkley and the Wharfe Valley are unclear in each case. While it is indicated that the options are not finalised, each is too restrictive and at the same time too vague in terms of detail.</p> <p>The critical issue is how the percentage of growth in each case is allocated between Ilkley and Keighley and the relevant Local Growth Centres - this is left unclear. Local factors need to be considered alongside the regional and district wide perspective or unsustainable conclusions may be reached.</p> <p>Any significant growth in Ilkley or the Wharfedale would have major implications for existing infrastructure.</p>

		<p>Schools in the area are generally at capacity and the one secondary school in Ilkley is already having to turn potential pupils away, as reported in the local papers this week.</p>
		<p>The transport infrastructure is close to, or even over, capacity at peak periods and the high level of longer distance commuting and the relatively low level of employment in Ilkley suggests that this pressure would be increased by more housing. Transport infrastructure takes many years to put in place. For example, to increase the capacity of the Wharfedale railway line means either doubling the railway track between Guiseley and Apperley Junction, increasing the platform length to accommodate longer trains, or re signalling much of the track to Leeds. None of these options would take less than five years to achieve and probably nearer ten years, taking account current funding arrangements. There are no further improvements detailed in the current West Yorkshire Railplan.</p>
		<p>Additional growth in Ilkley could only be achieved only by taking significant land out of green belt, thus gratifying the long-term speculators who own parts of the key areas and are prepared to make them available. Because Ilkley is squeezed to both north and south by designated protected land, the only developments can locate on the south side of the A65 corridor east and west of the town. Most land north of the A65 being designated washlands. Between Ilkley and Burley, there is a notorious 'ring slip' landslide which has cost millions for the Strategic Rail Authority to correct, many acres of very steep ground and a disused (landscaped) rubbish tip. Both east and west of the town, the green belt areas are of landscape value equivalent to that in the AONB north of the river in North Yorkshire. The suggestion that Ilkley should take 50% of the houses in Option 1 (7 500) overlooks the fact that this would double the size of Ilkley by 2026. Does this mean building another town with the same population of Ilkley between Ilkley and Addingham?</p>
		<p>We suggest that Bradford should be campaigning actively to ensure that all dwellings being built (subtracting those houses being demolished to make way for replacements) should be included in the count towards targets. This should include windfall sites as there are very few designated housing sites in Ilkley. Communal dwellings should be counted more effectively - for example - a residential nursing care facility for 200 people should count as more than 'one dwelling'. If these points mean changing national legislation, then BMDC should press for this as a matter of urgency. People who occupy windfall sites still need infrastructure and nothing additional is ever planned for such developments as they normally fall below the number of 24 dwellings.</p>
		<p>It is also worth noting that in recent floods Ilkley was effectively cut-off. Improvements to the A65 and the Moor Road to prevent flooding are highly unlikely, if not impossible from a technical viewpoint.</p>
		<p>Clarification of the statement in relation to Ilkley that, "Housing will be provided...commensurate with a town of this size" per the Spatial Vision and Strategy para 2.19 is needed.</p>

46/ 00511	Drivers Jonas on behalf of Countryside Properties Ltd	<p>Our client acknowledges that the focus of the forward Spatial Option within the Core Strategy should be the larger settlements, but considers that the development of employment opportunities in rural areas such as Silsden should form an important part of the Core Strategy and, as such, would support Spatial Options 2 and 4, which afford a more balanced approach to development across the settlement hierarchy.</p> <p>Outside of the principal towns, which, with a population of over 15,000 could include Baildon, Silsden and Queensbury are the largest and most significant of the district's Local Service Centres, with Silsden playing an important role in the Aire valley. The acknowledgement of the role of Local Service Centres to rural economies, and the allocation of land at the Keighley Road / Belton Road, would be consistent with PPS7 'Sustainable Development in Rural Areas', which states that regional and local planning policies should sustain, enhance and, where appropriate, revitalise country towns and villages for strong, diverse, economic activity, whilst maintaining local character and a high quality environment. PPS7 also states that, away from larger urban areas, planning authorities should focus most new development in or near to local service centres where employment, housing, services and other facilities can be provided close together.</p> <p>Furthermore, this approach is considered to be more consistent with the Spatial Vision that is set out in the Core Strategy, which identifies that, by 2026, Silsden will become an important centre for the northwest of the district, with a diverse local retail offer, commercial base and housing provision. In seeking to identify specific development opportunities to sustain the status of Silsden, the land at Keighley Road / Belton Road is considered to be highly preferable, given its proximity to the A650 and the shared railway station at Steeton, and the fact that its development will not contribute towards additional vehicle movement through the centre of the village.</p> <p>The role of 'Airedale Corridors: A Masterplan and Strategy for Airedale' in the consideration of spatial options is also noted. This document identified a significant demand for high-quality industrial and office premises from both businesses wanting to relocate from Keighley and Craven and inward investors into Airedale, and concluded that a new rural business park at Silsden would provide a way of meeting this demand. The point identified above about residents of Silsden travelling for employment opportunities is clearly also relevant in this regard.</p>
47/ 00004	Drivers Jonas on behalf of Arnold Laver & Company Ltd	<p>Arnold Laver does not seek to offer particular endorsement to any one of the four strategic options identified within the Further Issues and Options document, but supports the recognition within all four spatial options that the Canal Road Corridor is critical to growth within the Bradford Sub-Regional City. This recognition is no doubt because of the role that the Corridor can play in fulfilling the stated Strategic Objectives of the Core Strategy.</p>

		<p>As you may be aware, Bradford Metropolitan District Council (BMDC) and Arnold Laver, key landowners within the Canal Road Corridor, commissioned a Masterplan, published in 2006, to consider the future of the Corridor. As a result of this work, and an assessment of options to guide the onward regeneration of the area, the Masterplan identified the following vision to bring about transformational change:</p> <p><i>“To redefine the role, function and character of the Canal Road Corridor to create a series of quality mixed use and sustainable neighbourhoods which are well connected and maximise the development and amenity potential of the proposed new Bradford Canal.”</i></p> <p>In support of this vision for the corridor, the Masterplan identified the following strategic objectives:</p> <ul style="list-style-type: none"> · To recognise the importance of the canal as a catalyst for regeneration; · To ensure a balance of functions within the corridor; · To create a sustainable place to live, work and spend leisure time; · To promote a positive and viable mix of uses within the Corridor; and · To enhance movement and connection within the corridor. <p>It is noted that a Canal Road Corridor Area Action Plan (AAP) is proposed as part of the Local Development Scheme (LDS) and, if the AAP is ultimately delivered in accordance with the masterplan, the Canal Road Corridor will assist with achieving the following Strategic Options identified in the Core Strategy:</p> <ul style="list-style-type: none"> · The development of Bradford District as a key component of the Leeds City Region, by attracting investment and generation jobs; · The redevelopment of previously developed land in sustainable locations; · The delivery of the district’s housing, business and commerce requirements; · The fostering of socially inclusive communities; and · The provision of accessible and varied opportunities for leisure and recreation, including access to the countryside and the utilisation of green infrastructure.
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		<p>To conclude, Arnold Laver recognises the importance that BMDC has attached to the Corridor by confirming an AAP with the LDS and recognising it within all four spatial options of the Core Strategy. As a key landowner within the Corridor, and sponsor of the 2006 Masterplan, Arnold Laver is keen to reemphasise its commitment to the delivery of the Masterplan. For the Masterplan vision for the Corridor to be realised, however, it is suggested that a delivery vehicle or partnership arrangement be created at the earliest opportunity. Such an arrangement will offer the most effective way of generating the required funding for capital projects and, in advance of the AAP, will provide a mechanism for minimising the type of incremental development that will undermine a comprehensive strategy. Perhaps the greatest threat to the delivery of the Masterplan is incremental and ad-hoc developments that prevent or by-pass a mechanism for securing the funding required for canal, highway and landscape infrastructure. This will ensure the comprehensive regeneration of the Corridor and, in so doing, will enable the Corridor to make the maximum contribution towards the Strategic Objectives of the Core Strategy.</p>
48/00512	Burnett Planning & Development Limited on behalf of Tesco Stores Limited	<p>Tesco is concerned that the Spatial Vision in Part 2 of the Further Issues & Options document (e.g. at paragraph 2.24) and the Settlement Profiles at section 7, Part 2 (XVI) does not identify the quantitative and qualitative need for additional retail floorspace in Queensbury.</p> <p>Queensbury is a freestanding town and the Strategy should be aimed at improving the self sufficiency of the town in meeting the needs of its catchment particularly in respect of the provision of retail facilities. Reducing the need to travel out of Queensbury for shopping would be sustainable and socially inclusive.</p> <p>The Planning Authority has previously recognised the need for retail investment in Queensbury in granting planning permissions for retail development (i.e. 94/03491/FUL and 02/01213). In the Report to the Regulatory and Appeals Committee on 8 January 2003 on application 02/01213 the Authority stated that: <i>"Since the Co-operative store was built approximately 30 years ago, there has been no material increase in convenience floorspace in Queensbury. However, in that time a significant number of new homes have been built, with more being added. A new store, as proposed, would retain some of the expenditure generated currently spent outside Queensbury."</i></p> <p>Five years on from that Committee Report and Queensbury still does not have a new food store and the need is now even greater. It is important that the Core Strategy recognises Queensbury as a town centre which needs a new food store in the interests of sustainability and social inclusion.</p>

49/ 00213	Cllr G. Metcalf Menston Parish Council	<p>None of the options put forward should be considered. Menston and the Wharfe Valley are incapable of providing between 4000 and 5500 new houses. It is doubtful if sufficient land can be identified within the area that is not part of a flood plane or part of the Pennine Moors specially protected area. Infilling of land between settlements only detracts from each individuality and charm and fails to recognise why people reside there in the first place. Wharfedale is a sought after residential suburb of Bradford and it should be preserved as such. More thought needs to be given to the need to provide housing nearer to places of work or within reasonable accessible distance. Menston and the Wharfe Valley cannot meet these requirements in any shape or form and the Core Strategy and Spatial Vision for Bradford should be revised to reflect this.</p> <p>It is evident that the road and rail infrastructure cannot sustain an increase in the housing provision to any significant scale in the entire lower Wharfedale region.</p> <p>Menston has little employment and certainly nothing significant. Virtually all major local sources of employment have vanished within the last decade with the closures of High Royds on the door step and others within 5km such as Crompton Parkinson, Silver Cross, Garnetts and Scalebor Park. This is the case throughout Lower Wharfedale and the prospect of people being able to access employment within the district is not likely to improve so long as areas currently with employment exist and continue to expand. These areas are Leeds and Bradford City centres, South East Bradford with its better transport links and the Airedale corridor. These areas are highlighted as employment growth areas however travel to them from the Wharfe valley is difficult in most cases and virtually impossible by public transport in some.</p> <p>As the document advocates “development in areas with easy access to employment” the areas of Lower Wharfedale should not be considered when identifying areas for increased housing.</p>
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		<p>The secondary education system in Menston is currently stretched to its limits in so far as the majority of Menston children attend Guiseley Secondary School (Leeds CC) with limited places being available at Ilkley (Bradford MDC) and Otley Prince Henry's (Leeds CC) being currently full for Menston children.</p> <p>The places available at Guiseley School in future will be limited for the intake of Menston children because of the current expansion of nearer housing developments within the Leeds boundary: namely at High Royds, Crompton Parkinson's and Silver Cross.</p> <p>Places at Ilkley are currently limited and expansion of the school on its present site is not possible to cater for any future expansion of the local population. Menston children are approximately 5 miles from the Ilkley school and consequently will be the first to be excluded from entry should Ilkley develop. Travelling further a field to Bingley or Salts is not an option that should be considered feasible or practical.</p> <p>The existing provision for secondary education is inadequate at present and if new housing development within the district is to be considered then the local schools need to be expanded, or new schools build.</p>
		<p>The sites at Bingley Rd and Derry Hill were identified in the last UDP for development and 400 houses are earmarked to commence in 2009. Any future development must not occur within the core of the [Menston] village.</p>
		<p>Menston utilises Airedale Hospital, Leeds General Infirmary, St. James and Bradford BRI. Otley Hospital only has limited facilities and is not easily accessible. The Bradford hospitals and Airedale are virtually unreachable by public transport from Menston.</p> <p>Menston has a single Doctors Medical Unit and one dentist (private).</p> <p>Any additional development must consider increasing medical facilities within the village and provision of better transport links to the Hospitals.</p>
		<p>The Bingley Rd / Derry Hill enquiry identified that Menston is seriously short of Recreational space and playing fields and any increase in the population will only make the problem worse.</p> <p>Any additional development must address the overall shortage of recreational and playing field provision.</p>
		<p>Serious concerns are expressed within the village as to the capabilities of the foul and surface water drainage system.</p> <p>Before any additional development is considered these concerns must be answered and the existing drainage facilities identified as capable of taking more discharge or improved to do so.</p>

50/ 00513	Spawforths on behalf of Langtree Artisan	<p>The preferred spatial approach to Bradford District needs to realise the potential for the renaissance of the city itself. The renaissance of Bradford is crucial to the success of the District and the Leeds City Region.</p> <p>Therefore, none of the Spatial Options proposed seem to accommodate a desirable approach that will be able to deliver the sustainable future for Bradford District and its Vision. A combination of Spatial Options 1 and 3 seems to be the more appropriate way forward. This would focus development primarily within Bradford City, but also appropriate scale within other principal towns.</p>
51/ 00101	Sanderson Weatherall on behalf of Royal Mail Group Property	<p>Royal Mail Group Property (RMGP) have a number of existing properties within the district that serve the exiting population requirements. The distribution of new housing in the district will impact on the operational requirements and the existing capacity of RMGP in terms of deliveries and traffic movements. RMGP support the proposed growth points based in or around the existing urban areas and therefore support elements of all options and specifically, Options 3 & 4. It is important to note however that the increase in housing may result in a need for our client to increase its capacity. This may require our client to expand exiting premises or relocated and we trust that the authority would assist and support any such development requirements. In this regard, RMGP support the proposals for employment growth areas in locations served by good transport links within the district and the wider region.</p>
52/ 00514	Sandy MacPherson	<p>The basic problem I have is that I cannot agree with any of the four options put forward, none of them are in any way palatable or seemingly informed by the constraints inherent in expanding Ilkley to the status of a Principal town. Any significant addition to the housing stock in the Wharfe valley would surely mean a significant erosion of the Green Belt. Encroaching to any significant extent on higher ground runs up against the problem of the Moor and its special status to say nothing of the drainage problems this would mean for lower down in the valley. Building on the valley floor runs up against the problem of flood plain or else taking out large chunks of the best quality agricultural land in the district, which hardly comes under the rubric of joined up thinking when the problem of increasing world food shortages must be taken into consideration these days. Infrastructure problems in terms of public services of schools and transport are seemingly intractable which means even option four cannot be considered a viable option.</p> <p>Above all the figures on which the whole edifice is built simply do not add up as they differ significantly from ONS figures which are supposed to underpin the policy.</p>

		<p>Settlement Study Draft for Consultation, November 2007 states in Para.3.3 that “the total population of the District at the time of the 2001 Census of Population was 467,665”. This is a significant fall from the 1991 figures. And in Para. 1. 20 of Issues and Options for Further Consultation, November 2007 it states that “The housing requirement has increased ... based on the latest household projections. From 2008 this equates to 2,700 dwellings per annum to 2026” A simple calculations makes this (18x 2,700) 48,000 in total. Why then does Bradford put the figure at 50,000? It contrasts with the figures in the RUDP Par.6.3 (Housing) which was set by RPG12, par. 3.22 of an annual target of 1390 additions to the housing stock in the period 1998 – 2016.</p> <p>There is of course another particular factor which needs to be taken into account in this particular part of the District (Wharfedale/Ilkley). The main thrust of PPS3 is summed up in Par.9 Strategic Housing Policy Objectives and it is for affordable housing. One problem in this area is that there is a continuous confusion of the need for more housing and housing need – too often the Council does not make this distinction. It is particularly acute in this area. Ilkley is now seen as the second least affordable place in the country with a price to earnings ration of almost 12:1. It therefore makes little sense to set such a high target for this area where landowners can demand extremely high prices. However we do need to acknowledge that there is a particularly high need for affordable housing in the area but unless the 40% target is set based on a threshold of perhaps five or less then we will continue to see little but unaffordable executive homes being built here.</p> <p>There is of course the further problem of infrastructure and services which has been thrown into stark relief in recent weeks with the news that a significant number of pupils from Addingham in the Ilkley pyramid of schools have not been allocated places at The Grammar School for this year. It is a scenario which informed opinion in the town has been predicting for some years now and which will only worsen if Ilkley is to almost double in size in Housing terms alone. Transport problems would also considerably worsen for railway users down the line from Ilkley. We have been told over the years that it is impractical to lengthen platforms and add more carriages so a much higher population in Ilkley would mean the already overcrowded peak trains from Ilkley would result in no places for people from Burley</p> <p>None of the options put forward for Ilkley can be welcomed. The conclusion must be that even option 4 in the consultation paper must be rejected and that the Council has to go back to the drawing board on this issue. When the revised RSS is published in May the people of this District would appreciate it if the consultation on this document were a lot more accessible, transparent and part of a genuine consultation process in order that they can have some influence on having it significantly revised.</p>
53/ 00515	Mr Peter Boys, Brother Investments (Yorkshire) Ltd	Option 1

54/ 00084	Sanderson Weatherall on behalf of Keyland Developments Ltd	<p>Combination. In broad terms, Keyland Developments Ltd support options which:</p> <p>A) Confirm the importance of the M606 corridor as a location for significant additional employment development and growth.</p> <p>B) Encourage efficient re-use of Brownfield sites;</p> <p>C) Explore the scope for further consideration of development potential for employment generating development in the Esholt area, including the potential for changes to Green Belt boundaries;</p> <p>D) Support further investigation of potential for housing development in the Esholt area, again, involving potential green belt releases, but also needing to take particular account of the constraints imposed by sewage treatment works.</p> <p>On this basis, elements of all four options are supported in relation to points A) and B) above, while options 3 and 4 reflect all four areas of interest of Keyland Developments Ltd.</p> <p>The overall reference on this basis of current information would be for option 3). This reflects the key elements and opportunities which Keyland Developments Ltd have identified, but in other terms is considered to reflect the most sustainable approach to regeneration and meeting future development needs across the district as a whole.</p>
57/ 00518	Sanderson Weatherall on behalf of GMI Waterside Shipley Ltd	<p>Combination. Each option identifies the importance of Shipley (including Saltaire) as an area with growth of innovating industries should be encouraged. This approach is supported through this representation as a realistic reflection of market and investments aspiration.</p>
59/ 00088	Spawforths on behalf of miller Strategic Land	<p>We believe that the best scenario would be to follow the RSS Settlement Hierarchy, which supports the renaissance of Bradford and prioritises the delivery of existing allocated and safeguarded sites in the Adopted UDP. These sites have already been through a recent Examination in Public and have been considered by the Inspector to be deliverable sites and appropriate for development. Locating development primarily in Bradford and the more sustainable towns focuses development in the high order settlements. The benefits of this type of scenario are that it would, in accordance with PPS3, allow a wider choice of housing locations and bring higher levels of investment into the District.</p>

		<p>The preferred spatial approach to Bradford District needs to realise the potential for the renaissance of the city itself, prior to dispersing growth into the Airedale Valley and satellite towns. The renaissance of Bradford is crucial to the success of the District and the Leeds City Region. Therefore, existing sustainable sites within the city limits, including safeguarded sites in the Adopted UDP, should be brought forward ahead of developing growth points outside of these limits, such as at Esholt and Holmewood. There is a need for Bradford to consolidate and regenerate before Green Belt releases, new settlements and urban extensions are considered. Similarly, dispersing growth to all settlements would increase the need to travel and could allow significant developments on the edge of small villages, which would be out of character with the surrounding area.</p> <p>Therefore, none of the Spatial Options proposed seem to accommodate a desirable approach that will be able to deliver the sustainable future for Bradford District and its Vision. A combination of Spatial Options 1 and 3 seems to be the more appropriate way forward. This would focus development primarily within Bradford City, but also appropriate scale within Keighley and Ilkley to cater for their needs and the regeneration of the Airedale Valley. Local Service Centres would accommodate some development to cater for their needs and the surrounding rural villages. Following a thorough review of land within the City Limits and the development of available land, including all existing allocated sites and safeguarded land, Green Belt releases in sustainable locations on the edge of Bradford City should be considered or released through an appropriate phasing policy.</p>
60/ 00520	Simon East	<p>The basic problem I have is that I cannot agree with any of the four options put forward, none of them are in any way palatable or seemingly informed by the constraints inherent in expanding Ilkley to the status of a Principal town. Any significant addition to the housing stock in the Wharfe valley would surely mean a significant erosion of the Green Belt. Encroaching to any significant extent on higher ground runs up against the problem of the Moor and its special status to say nothing of the drainage problems this would mean for lower down in the valley. Building on the valley floor runs up against the problem of flood plain or else taking out large chunks of the best quality agricultural land in the district, which hardly comes under the rubric of joined up thinking when the problem of increasing world food shortages must be taken into consideration these days. Infrastructure problems in terms of public services of schools and transport are seemingly intractable which means even option four cannot be considered a viable option.</p> <p>Above all the figures on which the whole edifice is built simply do not add up as they differ significantly from ONS figures which are supposed to underpin the policy.</p>

		<p>Settlement Study Draft for Consultation, November 2007 states in Para.3.3 that “the total population of the District at the time of the 2001 Census of Population was 467,665”. This is a significant fall from the 1991 figures. And in Para. 1. 20 of Issues and Options for Further Consultation, November 2007 it states that “The housing requirement has increased ... based on the latest household projections. From 2008 this equates to 2,700 dwellings per annum to 2026” A simple calculations makes this (18x 2,700) 48,000 in total. Why then does Bradford put the figure at 50,000? It contrasts with the figures in the RUDP Par.6.3 (Housing) which was set by RPG12, par. 3.22 of an annual target of 1390 additions to the housing stock in the period 1998 – 2016.</p>
		<p>There is of course another particular factor which needs to be taken into account in this particular part of the District (Wharfedale/Ilkley). The main thrust of PPS3 is summed up in Par.9 Strategic Housing Policy Objectives and it is for affordable housing. One problem in this area is that there is a continuous confusion of the need for more housing and housing need – too often the Council does not make this distinction. It is particularly acute in this area. Ilkley is now seen as the second least affordable place in the country with a price to earnings ration of almost 12:1. It therefore makes little sense to set such a high target for this area where landowners can demand extremely high prices. However we do need to acknowledge that there is a particularly high need for affordable housing in the area but unless the 40% target is set based on a threshold of perhaps five or less then we will continue to see little but unaffordable executive homes being built here.</p>
		<p>There is of course the further problem of infrastructure and services which has been thrown into stark relief in recent weeks with the news that a significant number of pupils from Addingham in the Ilkley pyramid of schools have not been allocated places at The Grammar School for this year. It is a scenario which informed opinion in the town has been predicting for some years now and which will only worsen if Ilkley is to almost double in size in Housing terms alone. Transport problems would also considerably worsen for railway users down the line from Ilkley. We have been told over the years that it is impractical to lengthen platforms and add more carriages so a much higher population in Ilkley would mean the already overcrowded peak trains from Ilkley would result in no places for people from Burley</p>
		<p>None of the options put forward for Ilkley can be welcomed. The conclusion must be that even option 4 in the consultation paper must be rejected and that the Council has to go back to the drawing board on this issue. When the revised RSS is published in May the people of this District would appreciate it if the consultation on this document were a lot more accessible, transparent and part of a genuine consultation process in order that they can have some influence on having it significantly revised.</p>

		<p>The basic problem I have is that I cannot agree with any of the four options put forward, none of them are in any way palatable or seemingly informed by the constraints inherent in expanding Ilkley to the status of a Principal town. Any significant addition to the housing stock in the Wharfe valley would surely mean a significant erosion of the Green Belt. Encroaching to any significant extent on higher ground runs up against the problem of the Moor and its special status to say nothing of the drainage problems this would mean for lower down in the valley. Building on the valley floor runs up against the problem of flood plain or else taking out large chunks of the best quality agricultural land in the district, which hardly comes under the rubric of joined up thinking when the problem of increasing world food shortages must be taken into consideration these days. Infrastructure problems in terms of public services of schools and transport are seemingly intractable which means even option four cannot be considered a viable option.</p>
61/00521	White Young Green on behalf of Mi7 Developments Ltd	<p>WYGP supports the general approach proposed in the four spatial options for future settlement growth across the District. This indicates that at least 50% of future growth in the District should be located in and around the sub-regional city. Identified as being; Bradford, Shipley and Baildon south of Otley Road.</p> <p>WYGP supports the proposal of Bradford City Centre being identified as a concentrated growth point for settlement growth as proposed under all four strategic spatial options. We believe that directing new housing development in Bradford City Centre will help to fulfil the Vision for the City Centre of creating a vibrant centre as well as achieving a more sustainable growth patterns in the District.</p> <p>WYGP consider supports a spatial option which proposed new focused growth around the Bradford sub regional city, whilst allowing for the most sustainable pattern for future growth in the District and for reasonable growth in the Principal Towns of Ilkley and Keighley and in the Local Service Centres.</p> <p>WYGP understands that should the Leeds City Region New Growth Points (NGP) bid be successful, then one of the key locations as part of this bid is for the delivery of new housing in Bradford City Centre / Shipley and Canal Road Corridor. Therefore, it is understood that spatial option 3 does take consideration of the NGP initiative being implemented, with extensive future development being located in this area.</p>
62/00522	White Young Green on behalf of Prime Property Investments Limited	<p>WYG welcomes the focus that has been placed on the re-use of previously developed land and other sustainable development. We also recognise and support the emphasis that the Core Strategy has placed on the need to meet housing, business and commerce requirements across the whole District.</p>

		<p>Notwithstanding this WYG feels that the Core Strategy needs to apply greater flexibility in relation to the provision of housing development in Local Service Centres. This is for two important reasons:</p> <ul style="list-style-type: none"> ▪ Bradford District is a very large and diverse area, two thirds of which is rural in character. Many Local Service Centres act as a supporting role to the more remote rural areas in terms of the provision of services, facilities and amenities; ▪ Allowing housing development to come forward in Local Service Centres adds to the variety of options available for living accommodation for people wishing to locate their homes in the Bradford District.
		<p>Local Service Centres – their role in the District</p> <p>Although WYG recognises the important and integral part that Bradford City Centre and the Principal Centres such as Keighley and Ilkley will play in achieving the overarching spatial vision of the Core Strategy we feel it is equally important that support is given to smaller settlements and rural areas found in the District. This is especially relevant due to the fact that two thirds of the District is rural in character. Policy YH7 of the draft revised RSS incorporating Secretary of State's changes relates specifically to Local Service Centres. This Policy has a number of objectives which aim to protect and enhance the District's Local Service Centres. In particular focus is given to the retention and improvement of local services and facilities; support of economic diversification and meeting locally generated needs for market and affordable housing. So far the emerging Core Strategy has not done enough to provide security that these aims can be achieved.</p>
		<p>WYG strongly believes that the Emerging Core Strategy in its current state would struggle to deliver the District's Local Service Centres as '<i>excellent environmental, economic and social resources</i>' in main due to the limited amount of housing development that is to be allocated in these settlements.</p>
		<p>This limited amount of development being prescribed in the District's Local Service Centres is one example of the Core Strategy's inability to realistically and practically prepare for the long term needs of the District. There may be instances in Local Service Centres where due to local circumstances housing development has the opportunity to come forward. WYG believes that with an increase in the level of housing provision this would assist with the provision of affordable housing and economic gain in the Local Service Centres. The Core Strategy's Spatial Options discusses housing provision in Local Service Centres mentioning that it will be limited to catering for the local need. WYG believe that the Core Strategy should reflect the fact that in order to cater for this local need and to provide a mix of affordability in the District and more specifically in these Local Service Centres there needs to be support from Open Market housing developments. The Spatial Options does not allow for any windfall sites to come forward in any of the settlements. WYG suggests that the Core Strategy should make allowance for windfall sites to come forward so long as the site can demonstrate sustainability principles and is acceptable in development control terms.</p>

		<p>Local Service Centres – Housing Development</p> <p>In the rural areas of the District and within Local Service Centres there is often a limited range of employment opportunities. In sustainability terms the Core Strategy should ensure that housing and employment opportunities can come forward in the more rural areas to increase the potential for linked homes and jobs to be spread across the District. This would be in line with PPS1 which stipulates that local authorities should help to facilitate sustainable development in the LDF process by <i>“making suitable land available for development in line with economic, social and environmental objectives to improve people’s quality of life; and by “ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.”</i> This would also be in line with PPS3: Housing (November 2006), which has a primary objective of seeking to provide decent housing for everyone and in the most sustainable way.</p> <p>WYG believes that the hierarchy of settlements should be applied flexibly in order that it responds positively and does not unduly restrict opportunities for housing development that come forward in the smaller settlements in the District such as Queensbury. This is especially so if the site is ‘available’, ‘deliverable’ and ‘viable’ (as stipulated in paragraph 54 of PPS3) and also if the site can accommodate much needed housing development.</p> <p>WYG also feels that it is important that the longer-term development needs of smaller settlements are realised and delivered through the Core Strategy to encourage sustainability. Paragraph 3 of PPS3 reflects that in order to create and maintain sustainable rural communities in market towns provision of high quality housing should be made.</p> <p>WYG agrees with the overarching strategic objective as set out in the Emerging Core Strategy which has the aim of providing a range of quality dwellings, in terms of type and affordability to cater for the current needs and future growth of the District. WYG feels that the future growth of the District should include housing development in smaller settlements such as Queensbury and this should be reflected in the Core Strategy.</p> <p>As mentioned previously all four of the Spatial Options in the Core Strategy make limited provision for housing development in Local Service Centres. However, there are extenuating circumstances that should be considered by the Core Strategy which would warrant a greater level of flexibility for opportunistic development to come forward in these Smaller Settlements. Indeed, the Initial Sustainability Appraisal (SA) which forms part of the Core Strategy consultation mentions that low levels of development in Local Service Centres can limit the potential to cater for residents needs, particularly for affordable housing, to support facilities and attract people to be able to contribute to the local community and economy.</p>
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		<p>WYG have concern that the four Spatial Growth Options do not enable a degree of flexibility and responsiveness to market demand. Given that there will be a requirement for Bradford to deliver a significant increase in the amount of housing it is imperative that the Core Strategy applies a degree of flexibility within its selected Spatial Option. Option 1 and Option 3 provide an unreasonably low level of housing for Local Service Settlements especially considering how geographically diverse the District is. Option 2 and Option 4 provide a marginally increased level of housing for Local Service Centres and WYG are supportive of this increase. However, WYG feel that the figures are too prescriptive and could restrict future opportunities for delivery of the expected increase in housing numbers.</p> <p>We promote a spatial option which offers the widest choice of potential locations for housing development throughout the Bradford District with an increased focus on Local Service Centres. WYG have a concern that if very little growth is permitted in the Local Service Centres this would mean less opportunity to influence a change in the housing stock, which would impact on the range of housing types and affordability available for local communities. WYG also feels that it is important to allow a full range of sites to come forward across the District and at this stage options for housing growth in Local Service Centres should not be eliminated especially if the site:</p> <ul style="list-style-type: none"> ▪ Can demonstrate sustainability; ▪ Is acceptable in Development Control Terms; ▪ Would deliver much needed housing mix <p>When considering the suitability of a Local Service Centre such as Queensbury for increased development it is clear to see that even relatively medium sized settlements can and do play an important role not only for the existing residents but also for the immediate hinterland areas. Queensbury has a total of 57 local and national retail outlets. The centre contains an array of different retail and service outlets within all sectors. The number of services and facilities located in the centre are used by residents and visitors alike. The accompanying settlement study which forms part of the Core Strategy consultation states that Queensbury has a good range of facilities, and is well connected by a high frequency bus service. For this reason alone the Core Strategy should allow greater flexibility to allow Local Service Centres such as Queensbury to continue to develop their important role. The encouragement of new residential development in Queensbury will help sustain local services within the centre which is in accordance with both sustainable development principles set out in PPS1, PPS3 and PPS6 and will help sustain a vibrant and cohesive community in Queensbury over the plan period. We believe that by limiting housing number in key local service centres may lead to their decline over the plan period, this is clearly contrary to national and regional planning guidance.</p>
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62/ 00522	White Young Green on behalf of Commercial Estates Group	WYG welcomes the focus that has been placed on the re-use of previously developed land and other sustainable development. We also recognise and support the emphasis that the Core Strategy has placed on the need to meet housing, business and commerce requirements across the whole District.
		<p>Notwithstanding this WYG feels that the Core Strategy needs to apply greater flexibility in relation to the provision of housing development in Local Service Centres. This is for two important reasons:</p> <ul style="list-style-type: none"> ▪ Bradford District is a very large and diverse area, two thirds of which is rural in character. Many Local Service Centres act as a supporting role to the more remote rural areas in terms of the provision of services, facilities and amenities; ▪ Allowing housing development to come forward in Local Service Centres adds to the variety of options available for living accommodation for people wishing to locate their homes in the Bradford District.
		<p>Local Service Centres – their role in the District</p> <p>Although WYG recognises the important and integral part that Bradford City Centre and the Principal Centres such as Keighley and Ilkley will play in achieving the overarching spatial vision of the Core Strategy we feel it is equally important that support is given to smaller settlements and rural areas found in the District. This is especially relevant due to the fact that two thirds of the District is rural in character. Policy YH7 of the draft revised RSS incorporating Secretary of State's changes relates specifically to Local Service Centres. This Policy has a number of objectives which aim to protect and enhance the District's Local Service Centres. In particular focus is given to the retention and improvement of local services and facilities; support of economic diversification and meeting locally generated needs for market and affordable housing. So far the emerging Core Strategy has not done enough to provide security that these aims can be achieved.</p>
		WYG strongly believes that the Emerging Core Strategy in its current state would struggle to deliver the District's Local Service Centres as ' <i>excellent environmental, economic and social resources</i> ' in main due to the limited amount of housing development that is to be allocated in these settlements.

		<p>This limited amount of development being prescribed in the District's Local Service Centres is one example of the Core Strategy's inability to realistically and practically prepare for the long term needs of the District. There may be instances in Local Service Centres where due to local circumstances housing development has the opportunity to come forward. WYG believes that with an increase in the level of housing provision this would assist with the provision of affordable housing and economic gain in the Local Service Centres. The Core Strategy's Spatial Options discusses housing provision in Local Service Centres mentioning that it will be limited to catering for the local need. WYG believe that the Core Strategy should reflect the fact that in order to cater for this local need and to provide a mix of affordability in the District and more specifically in these Local Service Centres there needs to be support from Open Market housing developments. The Spatial Options does not allow for any windfall sites to come forward in any of the settlements. WYG suggests that the Core Strategy should make allowance for windfall sites to come forward so long as the site can demonstrate sustainability principles and is acceptable in development control terms.</p>
		<p>Local Service Centres – Housing & Employment Development</p> <p>In the rural areas of the District and within Local Service Centres there is often a limited range of employment opportunities. In sustainability terms the Core Strategy should ensure that housing and employment opportunities can come forward in the more rural areas to increase the potential for linked homes and jobs to be spread across the District. This would be in line with PPS1 which stipulates that local authorities should help to facilitate sustainable development in the LDF process by <i>“making suitable land available for development in line with economic, social and environmental objectives to improve people’s quality of life; and by “ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.”</i> This would also be in line with PPS3: Housing (November 2006), which has a primary objective of seeking to provide decent housing for everyone and in the most sustainable way.</p>
		<p>WYG believes that the hierarchy of settlements should be applied flexibly in order that it responds positively and does not unduly restrict opportunities for housing development that come forward in the smaller settlements in the District such as Queensbury. This is especially so if the site is 'available', 'deliverable' and 'viable' (as stipulated in paragraph 54 of PPS3) and also if the site can accommodate much needed housing development.</p>
		<p>WYG also feels that it is important that the longer-term development needs of smaller settlements are released and delivered through the Core Strategy. We refer to PPS3.</p>

		<p>WYG agrees with the overarching strategic objective as set out in the Emerging Core Strategy which has the aim of providing a range of quality dwellings, in terms of type and affordability to cater for the current needs and future growth of the District. WYG feels that the future growth of the District should include housing development in smaller settlements such as Cullingworth and this should be reflected in the Core Strategy.</p>
		<p>The Local Housing Assessment (January 2008) makes reference to higher income households moving to rural and semi-rural locations. To provide for this trend and prevent leakages to neighbouring Authorities greater growth and flexibility should be encouraged in Local Service Centres where lower density housing developments can be achieved.</p>
		<p>Local Service Centres – Economic Importance</p> <p>Local Service Centres do play an important part in sustaining the District's rural economy. WYG supports the Economic Objective as set out in the Core Strategy which is to promote a successful growing economy, by fostering indigenous firms and by attracting inward investment in the high value creative, innovative and knowledge based industries. Facilitating the development of rural industries, businesses and enterprises would accord with the requirements of Policy E7 of the draft RSS which aims to encourage the diversification and strengthening of the Region's rural economy. Within this policy there is also an expectation that support will be given to towns which act as a 'hub' for the local economy; also that rural towns should provide the main focus for employment development. Whilst we agree that Bradford City Centre will be a focus for this development we believe that smaller settlements across the wider District should benefit from this inward investment. However, the smaller settlements will not be able to maximize their potential as contributors to the economy unless the Core Strategy provides greater flexibility for this to occur within the outlined Spatial Options.</p>
		<p>Spatial Options and Our Recommendations</p> <p>As mentioned previously all four of the Spatial Options in the Core Strategy make limited provision for housing and employment development in Local Service Centres. However, there are extenuating circumstances that should be considered by the Core Strategy which would warrant a greater level of flexibility for opportunistic development to come forward in these Smaller Settlements. Indeed, the Initial Sustainability Appraisal (SA) which forms part of the Core Strategy consultation mentions that low levels of development in Local Service Centres can limit the potential to cater for residents needs, particularly for affordable housing, to support facilities and attract people to be able to contribute to the local community and economy. Growth should be targeted in areas that are available and capable of accommodating development particularly in light of the substantial Green Belt and other constraints around the Sub-Regional Centre and Principal Towns.</p>

		<p>WYG does not wholly support any of the Spatial Growth Options. We promote a spatial option which offers the widest choice of potential locations for housing and employment which seeks to spread economic growth beyond the Bradford Sub-Regional city. WYG have a concern that if very little growth is permitted in the Local Service Centres this would mean less opportunity to influence a change in the housing stock, which would impact on the range of housing types and affordability available for local communities. WYG feel that there should be greater flexibility to allow large allocations and opportunistic windfalls to come forward in Local Service Centres. WYG also feels that if economic development is only permitted to provide enough to cater for local needs then this might inhibit inward investment. Offering a wider selection of locations for employment will provide potential investors with the greatest choice of sites. This could potentially increase the likelihood of high quality job opportunities and enterprise locating in the Bradford District.</p>
		<p>When considering the suitability of a Local Service Centre such as Cullingworth for increased development it is clear to see that even relatively small settlements can and do play an important role not only for the existing residents but also for the immediate hinterland areas. For example the primary and secondary schools located in the village support 1200 pupils from Cullingworth and the surrounding area. There are also a number of services and facilities located in the village which are used by residents and visitors alike. The accompanying settlement study which forms part of the Core Strategy consultation states that Cullingworth has a good range of facilities, and that the area has been identified in the Housing Needs Survey (2005) as an area in need of affordable housing provision. For this reason alone the Core Strategy should allow greater flexibility to allow Local Service Centres such as Cullingworth to prosper and continue to develop their important role.</p>

64/ 00523	Dacre, Son & Hartley on behalf of Taylor Wimpey UK Ltd	<p>Firstly, it is considered that the 4 options are presented with little or no evidence base in terms of the actual deliverability of the options in real terms. This apparent lack of evidence potentially generates a false set of options.</p> <p>It is not clear within the options whether the percentage split within Principal Towns and Local Service Centres is split equally between each settlement. For example in Option 1 - 30% of total housing growth is proposed within Ilkley and Keighley - does this equate to 15% in each Town, or is the 30% sub-divided according to other determining factors, e.g. population, employment growth, availability of land?</p> <p>Whilst there is some indication e.g. of preference to specific LSC's in Option 2, it is not clear how the housing provision is proposed to be distributed to each Principal Town and LSC for each of the options.</p> <p>Assuming, for the purposes of assessing each option, that the distribution is equally split, the table below provides an indication of how the percentage splits equate to annual housing provision, taking the RSS Proposed Changes annual gross figure of 2,740 for the Bradford District. The figures in brackets are the individual annual requirements in each town or centre, based on an equal distribution.</p>																														
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		<p>Option 1:</p> <p>Option 1 is too spatially focussed towards Keighley and Ilkley, at the expense of the Local Service Centres, which would see only 5% of the District's annual development. While there is clearly some growth potential in both of these Principal Towns, the level of development proposed in this option would be unprecedented and without any evidence to support its deliverability.</p>
		<p>Option 2:</p> <p>Option 2 is too also spatially focused on the Principal Towns of Keighley, Ilkley. Bingley is not a Principal Town in the RSS are there are therefore immediate issues regarding terminology and conformity with the RSS.</p>
		<p>Option 3:</p> <p>Option 3 is too spatially focussed on the Bradford Sub Regional City and overly reliant on growth points around the main urban area, at the expense of growth of potential other settlements along the Airedale Corridor for example.</p> <p>The 70% split towards the Bradford Sub-Regional City development area would require a build rate of almost 2,000 units per annum from within an area with multiple transport, environmental and market constraints which have in the past combined to deliver housing at rate of only one third of that suggested in Option 3. Combining this with a widely accepted slow down in the City Centre apartment market, we consider Option 3 to be both unrealistic and undeliverable.</p>

Option 4:

Of all the identified options, we consider that Option 4 to be the nearest to that option that could deliver sustainable development at the rate required by the RSS. However we do not fully agree with the approach in Option 4 and suggest an alternative 'Option 4a' based upon our following concerns. This Option 4a is attached at Appendix 1.

Option 4 maintains a focus towards the Bradford Sub Regional City, including new growth points, but also includes Local Growth Centres separate from the main urban area. These will assist in the delivery of additional housing but may not conform to the terminology used in the draft RSS (September 2007 Modifications). Further evidence is required to demonstrate the sustainability credentials of these Local Growth Centres.

We do not consider that either Burley or Menston should be considered 'Local Growth Centres'. There is limited land available within both these settlements beyond the Phase 2 housing allocations. Including Menston and Burley as Local Growth Centres within Option 4 would require the delivery of a significant number of dwellings in a part of Wharfedale that has limited available brownfield land, significant environmental constraints and little scope to improve upgrade the public transport network. In our option 4a, we downgrade these two settlements to that of Local Service Centre.

We consider that growth needs to be distributed across the District to ensure that future housing supply meets all market demands. Too much emphasis on the Bradford main urban area will be at the expense of the rest of the District, and will result in distorted growth with not all jobs not being located near to new homes.

		<p>Option 4a: (table included with representation)</p> <p>Our alternative Option '4a' at Appendix 1 is a variation of Option 4 and aims to match homes with jobs. This option indicates how the percentage split is broken down into each settlement and gives an approximate indication of the annual requirement in each settlement.</p> <p>We suggest 60% of the overall requirement is focussed on the Bradford Sub Regional City and surrounding main urban area, broken down realistically. This includes the provision of a new settlement, and a Green Belt urban extension, and does not provide for too many dwellings within the City Centre, as this could be difficult to deliver, especially in the current market conditions and preference for houses as opposed to city apartments.</p> <p>We consider that 75 additional dwellings within Ilkley is an appropriate amount, given the constraints that surround Ilkley. This amount will allow the Town to grow sustainably and deliver affordable housing but not at the expense of the environmental constraints.</p> <p>This alternative option appropriately identifies Local Growth Centres, in accordance with the Spatial Vision as it will enable development of the Airedale Corridor up to Silsden and Steeton as well as allowing dispersal of growth to Thornton and Queensbury to the south of the District.</p> <p>Our Option 4a is our initial suggestion on an option that would be deliverable in market and economic terms. Matters relating to overall relative sustainability will need to be tested once a more comprehensive evidence base is available.</p>
65/ 00524	Mrs Lesley Bosomworth	<p>Combination.</p> <p>Possibly Option 3 <u>but</u> with the inclusion of Bingley as a principal town too. Bingley has excellent transport facilities and a lot more employment opportunities than Wharfedale. Bingley and Baildon have higher population than Ilkley and have better access to good rail (Local Mainline) links. The Aire Valley Trunk Road. The geography and topography limits expansion in Wharfedale and this should be taken into account as well as its beautiful setting. It ends up as a concrete jungle tourists or day trippers will not come and spend their money here making even less employment opportunities!</p>

66/ 00021	Mr John Grundy	<p>A) Ilkley and Keighley are different and all the options are shakily based on the assumption that they can equally be developed as principal towns.</p> <p>B) Current developments are swallowing up Guiseley and will, unless Bradford defends us well, sweep through Menston and Burley-in-Wharfedale to Ilkley. We have fought hard to preserve our Green Belt and hence our village character; the Moors and the AONB preclude building other than along the valley bottom.</p>
67/ 00525	Ms Josephine Vento	Development should be focussed on main urban area and the towns. Significant growth at and /or green belt re east's in smaller settlements (such as Burley) not appropriate nor in accordance with national guidance (PPG2/PPS3) or RSS.
68/ 00062	Nathaniel Lichfield & Partners on behalf of Hallam Land Management	<p>It is noted that paragraph 1.17 refers to growth being encouraged (a) to the south of Bradford City centre and (b) in east Bradford. It is considered that growth to the west of Bradford would also contribute positively to the development of Bradford as a sub-regional city and this should be acknowledged in the text. The Western edge, whilst largely bound by Green Belt, includes areas of available, suitable and achievable land that could make a significant contribution to meeting Bradford's RSS requirements in a sustainable manner. It includes land that has been safeguarded by the Council's to meet future housing needs.</p> <p>Spatial Option 1 'RSS Settlement Hierarch Option'</p> <p>With reference to paragraph 4.8 it is noted that this option relates directly to the settlement hierarchy set out in the RSS. Any spatial strategy proposed for the District must be in general conformity with the RSS to ensure that it passes Test of Soundness iv. At paragraph 4.24 of PPS12 and this approach is therefore supported.</p> <p>Following on from the above, paragraph 4.9 sets out how the Council proposes to distribute the RSS housing allocation from 2008 to 2026 across the settlement hierarchy. It is noted however that the document does not explain or provide a justification of the percentage targets proposed. It is considered that further explanation of how the percentage figures are arrived at should be provided to enable proper consideration. We therefore reserve the right to comment further when this evidence has been provided.</p> <p>Paragraph 4.10 refers to the locations in which housing development in Bradford would be concentrated. Justification for the specific reference to East Bradford in this context is required. In this regard it is highlighted that locations to the west of Bradford could also provide suitable available land for development, including areas of land safeguarded from the Green Belt. In this regard the reference at paragraph 4.11 to the need to develop Safeguarded Land around Bradford is strongly supported. The relatively recent adoption of the Replacement Unitary Development Plan (RUDP) means that the locational suitability of such sites is likely to remain valid PPS3's advice on the matter is not materially different to that of PPG3.</p>

		<p>Spatial Option 2 ‘Continuation of the RUDP Strategy’</p> <p>This Option proposes a continuation of the existing RUDP strategy with modifications. We object to this strategy on the basis that (a) the RUDP strategy with modifications. We object to this strategy on the basis that (a) the RUDP strategy has since been superseded by PPS3 and the RSS which differs with regard to the settlement classification and consequent distribution of development’ and (b) it is not clear in what ways the Council proposes to modify the existing RUDP strategy. It could therefore fail Test of Soundness (iv) regarding conformity with the RSS.</p> <p>In the absence of any detailed explanation to support the proposed strategy and demonstrate accordance with the RSS we also object to the proposed housing distribution percentages set out in paragraph 4.17.</p> <p><i>Justification for the specific reference to East Bradford at paragraph 4.18 is required.</i></p> <p>With reference to paragraph 4.19 the reference to the development of safeguarded Land as identified in the RUDP is supported. In this regard it is highlighted that Safeguarded Land to the west of Bradford should be developed ahead of Green Belt land. This would reduce the need to utilise Green Belt land in the north, east and south of Bradford/Shipley area.</p> <p><i>Spatial Option 3 ‘Focussed Growth Points around the Bradford Sub-Regional City’</i></p> <p>The proposed distribution of the RSS housing allocation in paragraph 4.27 is supported. This distribution would ensure that most development occurred within or adjoining the main urban area of Bradford in accordance with Bradford’s Sub-Regional status in the emerging RSS.</p> <p>With reference to paragraph 4.28 it is highlighted that the development of Safeguarded Land to the west of Bradford could reduce the need for extensive Green Belt release to the east at Holmewood. In this regard the reference to further development of Safeguarded Land in the paragraph 4.29 is supported.</p> <p><i>Spatial Option 4 ‘Dispersed Growth Points’</i></p> <p>It is noted that this option proposes extensive Green Belt release to the east at Holmewood and a new settlement at Esholt. It is emphasised that the development of Safeguarded Land to the west of Bradford could reduce the need for both Green Belt release and a new settlement. In this regard the reference to further development of Safeguarded Land in paragraph 4.37 is supported.</p> <p><i>Comparison of the Strength and Weaknesses of each Option</i></p> <p>Table 1 compares the four Spatial Development Options to determine the relative strengths and weaknesses of each. It is noted the Option 2 and 4 are not considered by the Council to be in accordance with the RSS and as such these options require reconsideration to achieve conformity.</p>
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70/ 00527	Natural England	<p>It is notable that each of the options has strengths and weaknesses as described in Table 1: Comparison of Strengths and Weaknesses of Each Option.</p> <p>It will be important for the decision on which option, or combination of options to take forward to be based on up to date accurate information in line with PPS9, the first key principle of which states: <i>“Development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their areas</i></p> <hr/> <p>To this end, the environmental constraints map represents only the most basic articulation of the factors which will inform the location and / or mitigation for development. Whilst satisfactory for its role within this Issues and Options document, the list of actual environmental constraints that should be considered in assessing options, particularly in the sustainability appraisal, will be far greater. Several additional constraints are described in the settlement study. However, constraints additional to those presented on the map will include, for example:</p> <ul style="list-style-type: none"> • The presence of Special Areas of Conservation, designated for their habitats of European importance (currently only Special Protection Areas are shown on the map); • The presence of Local Nature Reserves (Bradford has recently designated Railway Terrace LNR) and any geological designations, such as RIGGS; • The presence of priority habitats in the UK Biodiversity Action Plan and in the local biodiversity action plan; • The presence of Scheduled Ancient Monuments, historic parks and gardens, historic battlefields and Landscape Character Areas (recognising that Bradford are undertaking a Landscape Character Assessment); • The location of green infrastructure links, such as public footpaths, cycle routes and strategic opportunities to link sensitive fragmented habitats together².
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² Natural England are currently working in partnership with a number of local authorities, including Bradford to map green infrastructure opportunities.

		<p>It will also be important for the options to give weight to the effects of development on the integrity of habitats. This will be an important consideration of the Appropriate Assessment / Habitats Regulations Assessment when it is produced. Sensitivities of this SAC include the effects of trampling and atmospheric pollution, so it will be important to ensure additional housing growth / development can be accommodated without significantly affecting the integrity of the SAC / SPA. The sustainability appraisal will also need to consider other nature conservation sites and landscapes. For instance, what will be the effect on the Sites of Special Scientific Interest? Will significant additional housing affect the landscape character of an area? We have previously made comments in relation to the draft sustainability objectives, including appropriate indicators to measure in our previous letter of 2nd April 2007.</p>
		<p>From a wider biodiversity perspective, the Nature on the Map (www.natureonthemap.org.uk) website reveals that there are several priority habitats which will need to be considered within any planned growth of housing and employment sites. For instance, areas of ancient and semi-natural woodland exist around several settlements, including in the Shipley-Esholt area, to the south east of Keighley, to the north of Ilkley, and around the south and east of Bradford. In Airedale, a substantial area of lowland grazing marsh exists between Steeton and Keighley, and to the South of Keighley there are areas of lowland heathland. Paragraph 11 of PPS9 is clear that policies in plans should conserve habitats of principle importance (i.e. the list published under Section 74 of the Countryside and Rights of Way Act 2000 and subsequently incorporated and updated in the UK Biodiversity Action Plan) and identify opportunities to enhance them. Whilst this may be covered elsewhere in the LDF, the principle of protecting and enhancing habitats of principle importance should act as a key consideration in weighing up the most sustainable spatial options for the location of development.</p>

		<p>There may also be protected and priority species populations within several of the areas proposed for development and consultation with the Local Records Centre (in Bradford's Case, West Yorkshire Ecology) will be important.</p> <p>Many of these areas exist within the green belt, and, prior to any consideration of utilising green belt land, baseline information should be gathered in the form of a wide ranging review of the green belt. Such a review could look at a number of issues, including, though not exclusive to:</p> <ul style="list-style-type: none"> • Assessing the green belt within the context of the draft RSS³ • Assessing the physical constraints to sustainable development in the green belt, including, crucially, consideration of the environmental capacity of the area, taking account pressures such as climate change; • Assessing the quality, including landscape and biodiversity quality, and accessibility of green belt land; • Identification of long term defensible boundaries to the green belt; <p style="padding-left: 40px;">Assessment of opportunities to enhance the green belt to deliver maximum benefits to people and wildlife together.</p> <p>It is also important to note that new development itself offers important opportunities to provide good quality green infrastructure, and opportunities for good quality and sustainable design that complements the local landscape and townscape. This is true not just outside the urban area, but also within towns and villages. PPS9, for example, suggests that local planning authorities should maximise opportunities for building in biodiversity in and around developments.⁴ Natural England, have, in partnership with a number of local authorities, including Bradford, mapped a number of green infrastructure opportunity areas in Bradford. This project will help inform the LDF process, and where potential development coincides with green infrastructure priorities, account should be taken of the extent to which developments are able to contribute to the integrity, enhancement and creation of substantial connected networks of green space, in line with policy ENV 15 of the Draft RSS.</p>
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³ Government Office for Yorkshire and the Humber, 2007. The Yorkshire and Humber Plan: The Draft Regional Spatial Strategy Incorporating the Secretary of State's Proposed Changes, Government Office for Yorkshire and the Humber, Leeds.

⁴ ODPM, 2005. Planning Policy Statement 9: Biodiversity and Geological Conservation, TSO, Norwich

		<p>A further element to assessing the appropriateness of the options is their contribution to sustainable development in Bradford. The comparison of strengths and weaknesses of each option, summarised at table 1, includes reference to how each option links to transport corridors, and tables in the settlement study indicate the public transport and cycling facilities within each area. We welcome this assessment, but note that travel distance rates are high from many outlying settlements as well as Ilkley and Bingley. Options that promote significant housing growth in these settlements are likely to increase traffic and associated pollutants in the District, unless public transport potential, including links to new potential employment growth areas, are improved in line with development. This is considered to a limited extent within the sustainability appraisal, which indicates that Option 2 in particular may lead to longer journeys. While we acknowledge the importance of ensuring that development takes place within public transport corridors, it will be important to ensure that there is sufficient use of policies to encourage the use of public transport, walking and cycling in line with PPG13 and the Local Transport Plan and that the potential for increased accessibility between housing, employment and public transport routes is fully implemented in line with the approach set out at Policy T3 of the Draft Regional Spatial Strategy.</p>
		<p>To summarise our response to this question we believe that no single option can be chosen without a thorough appraisal of the green belt, assessment of the impacts on priority habitats and protected sites / populations of protected species and the testing of any preferred approach via a Habitats Regulations Assessment to discern effects on SPAs and SACs which are scoped in to the assessment. We also believe that accessibility via public transport, walking and cycling will need further consideration to ensure the propose new housing and employment areas contribute to sustainable development.</p>
71/ 00528	Turley associated on behalf of Fox Land and Property	<p>Four spatial options are proposed within the paper, all of which recognise that in order to accommodate the necessary levels of housing growth proposed for the district, a significant proportion will need to be located in Principal Towns defined as Keighley, Ilkley and potentially Bingley. The paper also recognised that in order to accommodate growth it will be necessary to release sites currently allocated within the adopted UDP as Phase 2 Housing sites and Safeguarded Land, together with major green belt releases and urban intensification. It does not more it clear however, whether each of these measures are to be weighted equally or are stated in order of sequential preference and/or priority. Further clarification should therefore be provided on this point. Notwithstanding this, the position is supported by my client, given the scale of development to be accommodated and the likely constraints on the availability of suitable land within the district. Furthermore, the scale of the housing requirement plainly could not be accommodated wholly in the urban area, and doing so would not provide the required balance and choice of housing sites.</p>

		<p>It is not clear how the proposed percentages have been derived or how the overall proportion of housing to be accommodated within the Principal Towns is to be split between them. The draft Settlement Study prepared by the LPA recognises that Keighley offers a significantly superior range of facilities and services including schools, shops and health facilities compared with Ilkley and Bingley and it is therefore considered to present a more sustainable option than the other two towns and accordingly is able to accommodate a greater amount of housing growth. The provision of housing in sustainable locations close to a range of facilities is fully consistent with the Government's sustainable development objectives set out in PPS1 and to reduce the need for car journeys in PPG13 and is therefore supported by my client, with support given to the maximum weight of housing being accommodated within Keighley.</p> <p>Furthermore, compared to the other Principal Towns Keighley has a much higher level of allocated Phase 2 Housing Sites and Safeguarded Land (56ha) compared with Ilkley (none) and Bingley (17.63ha). Given the recognised need for the release of Phase 2 housing sites and Safeguarded Land, it is therefore appropriate that the majority of the housing growth be accommodated in the Principal Towns, should be directed to Keighley.,</p> <p>On the basis of the above, Fox Land and Property fully supports option 1 of the Core Strategy Issues and Options paper as this accords with RSS spatial objectives relating to the distribution of development within the LCR. It recognises that the precise proportion of housing to be accommodated by the Principal Towns must be carefully considered but that the greatest proportion of the development is directed to Keighley as being the most sustainable settlement. This approach would also utilise the availability of Phase 2 housing sites and Safeguarded Land available in Keighley which have been previously examined in public, found acceptable and specifically reserved for such future needs.</p>
72/ 00200	Yorkshire Water	<p>Yorkshire Water's largest operational interest in the Bradford area is Esholt Waste Water Treatment Works (WWTW). It is a large strategic works serving over 300,000 people, where sewage and sludge are handled and treated to ensure that the environmental impacts of wastewater meet European standards. Our concern is to preserve the operational integrity of this asset and to continue to meet the demands placed on it by the businesses and people of Bradford.</p> <p>Due to the requirements of the Freshwater Fisheries Directive we are currently undertaking an extensive programme of improvements at the works, due to be completed by 2010. This will lead to a significant area of land being released from operational use. The majority of this land is likely to become available for development during the lifetime of the Local Development Framework. Esholt WWTW already has three areas of land allocated as Major Developed Sites within the Adopted Replacement UDP and any land that becomes available would be classed as a brownfield site within the Green Belt.</p>

		<p>The likelihood of surplus land at Esholt becoming available for re- use was identified within the Master Plan as part of the long term vision for the area. It has also been highlighted in two of the Spatial Options presented in this Further Options consultation. We would support, in principle, the allocation of housing and employment uses in the area. Any future use will have to be compatible with the continued operation of the WWTW, albeit within a reduced footprint. The Core Strategy must complement and support the aspirations of the Master Plan whilst allowing greater flexibility in terms of land use allocations that will meet both Yorkshire Water’s operational requirements and the social, economic and environmental needs of the area. Due to this we believe that Spatial Option 3 offers the most appropriate distribution of housing.</p>
		<p>In terms of the spatial options, we generally believe that option 3 offers the best distribution in terms of utilising existing infrastructure. As the majority of development will be focused around the urban area of Bradford. It also focuses less development to the principal towns where it is less likely that existing capacity exists and more likely that Greenfield land will be used.</p>
73/ 00529	Dacre, Son & Hartley on behalf of Clays of Addingham	<p>In selecting a preferred option, the selection of the level of housing and employment growth, which is feasible in each Local Service Centre, needs to be tested. The extent of recent growth and development in other LSC’s in the same housing market sub area should be recognised in selecting one or more LSC’s capable of accepting modest growth. In this context, there is now more scope for, and advantage arising from, growth at Addingham compared with Burley and Menston. With improved public transport connections, modest growth at Addingham would fit well with the future settlement hierarchy in Wharfedale.</p> <p>All 4 options contemplate Green Belt release around Ilkley and we agree that this is necessary but with significant limitations on any expansion to the north or south. Any Green Belt review should include land around Addingham, particularly where the Green Belt functions and values of land are rather limited.</p> <p>In various parts of the 4 options, the Council seeks to rely on phase 2 UDP allocations for development in a number of the LSC’s. It is fairly clear that most of this phase 2 sites will be built out in the earliest years of the plan period, and clear provision has to be made for a 5-year available supply and a 15-year plan supply. In this context, a Green Belt review in and around the Wharfedale settlements is inevitable.</p> <p>The concept of local growth centres in option 4 is a possibility, but this should not be applied to Burley and Menston. As stated in 4.8 above, all Local service centres should be subject to detailed capacity testing to establish their individual growth potential. We do not support any of the 4 options in full and consider that further work is necessary on the capacity of the principal towns and LSC’s to accept particular levels of growth. There should be differentiation between LSC’s based on their capacity to accept growth.</p>

74/ 00530	David Blackburn	None – all unrealistic. If none how provision for services can be made i.e. education, utilities.
75/ 00097	Charles Patchett, Patchett Homes	<ol style="list-style-type: none"> 1. Residential development should be encouraged around the existing settlements that form the Bradford area. 2. Concentration of new housing in Canal Road area of Bradford, although convenient and sustainable, will not be desirable those looking for family housing. 3. Too many apartments have been and are being built in city centres that only cater for the younger age groups and do not promote family life. 4. We need more housing for families. 5. The constraints placed on development sites by planning policies makes sites more expensive and less viable, leading to less housing and fewer affordable properties, 6. Bringing more sites forward for development will give more choice to developers and bring land process down.
76/ 00531	Walker Morris on behalf of Mr & Mrs Hopwood	<p><i>Spatial Option One- the Preferred Spatial Option</i></p> <p>Spatial Option One: RSS Settlement Hierarchy Option is fully supported and the preferred Spatial Option. This option provides the most sustainable choice for development with the majority (65%) of development occurring in the Sub-Regional City and 30% in the Principle towns of Keighley and Ilkley.</p> <p>This option is supported as it is also in conformity with the Regional Spatial Strategy. The Revised Draft RSS is close to being adopted and will be by the time Bradford issues its Preferred Option Core Strategy. It would therefore be wise to ensure that the Core Strategy is in general conformity with the RSS from the outset. The target for RSS policy YH5 is for more than 50% of housing to be focussed in regional and sub- regional cities and towns.</p> <p>Furthermore, Spatial Option One is the most sustainable option as it aims to provide new development in and adjacent to existing settlements therefore reducing the need to provide development in the smaller, less sustainable settlements (only 5%).</p> <p><i>Spatial Option Two</i></p> <p><i>Spatial Option Two does not provide the most sustainable strategy for the location of growth as it is more dispersed. Fewer dwellings are to be located in the main Sub-Regional City in favour of providing them in the Local Service Centres (20%). This would encourage more commuting to jobs and local services as people are less likely to travel further distances on public transport. This option would also promote the release of Green Belt sites in the least sustainable locations.</i></p>

Spatial Option Three

Spatial Option Three does not provide the most sustainable spatial strategy as it allocates a relatively large proportion of new housing to the Local Service Centres at the expense of providing housing in the Principle Centres. This will encourage out commuting to jobs and services, and housing provision in the least sustainable locations.

Spatial Option Four

Spatial Option Four is objected to as it is considered to be the least sustainable option. At the heart of current planning policy is the sustainability agenda. By dispersing the growth points and providing a bit of development everywhere, it leads to the potential of more commuting to jobs and services than if development is concentrated in the existing settlements of the sub-regional city, and the principle towns of Ilkley and Keighley. There is also the proposal to create a new settlement at Esholt, which is also considered highly unsustainable as it will mean that a vast amount of Green Belt will have to be developed.

However, it appears that Spatial Option Four comes out as the best option when looking at the comparison table provided (Table 1), as it achieves 5 ticks in the strengths and only 5 ticks in the weaknesses. Spatial Option One comes out the poorest. This is highly surprising as it is considered in this report that Option Four is the least sustainable and is also not in conformity with the RSS. Policy YH8 of the Revised Draft RSS has been amended at section A 3 to state that the third priority for the location of development should be located in extensions to existing settlements and not in planned growth areas (which has been deleted). If Option Four did progress then there may be issues regarding the tests of soundness, specifically the test relating to conformity.

PPS12: Local Development Frameworks, at paragraph 4.19 states that Local Development Documents must be in general conformity with the RSS. Whilst an LDD does not necessarily have to be in complete conformity with the RSS, it should be in general conformity with the overall principles. It would appear that Spatial Option Four is not in general conformity with the basic principles of the RSS set out in the Revised Draft RSS, mainly that development should be focussed on the sub-Regional city and the Principle Towns (see Draft Revised RSS policies YH5, YH6, and YH7).

Furthermore, the table does not employ a comprehensive list of strengths and weaknesses and is considered to be biased. It is also felt that ticks are not awarded in some cases where they are warranted for example, the Green Belt releases targeted to the north and east of Bradford/ Shipley/ Lower Baildon, and in well connected transport corridors applies to more than just Spatial Option Four as does the strength relating to development being based on existing transport corridors.

77/ 00532	Carter Jonas on behalf of Mr Tony Kemp	<p>Four options are included which variously seek to identify sufficient land for housing and jobs. Each option promotes a different strategy in terms of the focus for development as well as the distribution and proportion of that development. Settings them out in terms of the emerging RSS proposals and the existing RUDP strategy is a helpful point.</p> <p>In all circumstances however, it is not certain why the levels of development between the various hierarchies of settlement have been proposed and as such they appear quite arbitrary. For example Bingley is identified as a Principal Town in Option 2, a Local Growth Centre in Option 4 and as a Local Service Centre (LSC) in Option 1 and 3. Within the text explaining LSC's the document will be focussed into LSC's with good access to public transport.</p> <p>In terms of the levels of housing and employment land, the Council have recognised that not all development can be accommodated on brownfield land. Also it is acknowledged that the two components may be competing for the same land – for example to the south and east of Bradford. The Council have suggested a prudent approach in that consideration will be given to using green field sites, including RUDP Phase 2 sites and rolling back the Green Belt in certain locations. This should be done in a strategic way to propose major land releases and more localised releases of Green Belt where required and circumstances permit.</p> <p>On the basis of the evidence and information before us we are not in a position to recommend what the Preferred Options should be in respect of the distribution and location of development for accommodating homes and economic growth and the balance of priorities for the Council, for example, environmental protection.</p> <p>Development should be distributed across the District based upon a clear set of spatial priorities including economic development imperatives, the ability of existing infrastructure and environmental capacity to accommodate development or into locations where the social, community, physical and transport infrastructure can be upgraded or provided to allow a reasoned consideration.</p> <p>Of those highlighted Option 1 would lead to a concentration of development into Keighley and Ilkley, which due to environmental and physical constraints may not be able to accommodate the development . A lower proportion of development in the Local Service Centres may compromise the ability to deliver affordable homes along with open market housing in these area.</p> <p>Within this option Bingley is defined as a Local Service Centre an approach that does not specifically differentiate it from smaller settlements such as Oxenhope. This would not seem to be an appropriate approach as the ability of Bingley to accommodate development in terms of existing social community and transport infrastructure would appear greater than that in Oxenhope, for example.</p>
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		<p>Option 2 reflects the current RUDP strategy and suggest that Bingley should be identified as a Principal town. This is a position, which would more adequately reflect its status within the District on a par with Ilkley and Keighley. The emerging RSS does suggest that local Council's can recommend additional Principal settlements, such as Bingley.</p> <p>Within this option the distribution of development would seem better than Option 1 giving the opportunity to spread the benefits of development in particular to some of the smaller settlements.</p> <p>For Option 3, much of the development is focuses into the main urban area and the Principal settlement with intensification of uses in Ilkley. We would question whether the two Principal settlements could accommodate this level of development without significant environmental effects. Again, only a limited amount of development into Local service Centres would threaten the smaller centres or their ability to provide affordable housing to meet local needs.</p> <p>Rolling back of Green Belt to accommodate major areas of growth at Esholt and Homewood would need to recognise the strategic role of preventing the coalescence of settlements and retaining the separation between Bradford and Leeds.</p> <p>Option 4 proposes a number of specific growth points which includes Bingley as a growth centre, a further designation for which the purpose is not clear. For example how is it differentiated from a Local Service Centre where growth will be focussed?</p> <p>Invariably the options provided a hotchpotch of titles and potential growth strategies but without giving the respondent the opportunity to make a judgement between them. In overall terms we consider that Bingley should be identified as a Principal settlement and the amount of development that it can accommodate be identified so that an informed debate can follow.</p> <p>For example, we would have welcomed the opportunity at this early stage to have some debate of on the priorities for rolling back the Green Belt in particular locations where high levels of accessibility by public transport can be demonstrated, not only across Bradford itself but also the wider City Region.</p>
78/ 00083	Mrs Christine Dale Ilkley Parish Council	<p>Option 4.</p> <p>Yes in as far as I didn't know all the other areas.</p> <p>Ilkley is a tourist/dormitory town with little employment. The topography restricts any further buildings other than "garden grabbing". Some green belt needs to be retained for leisure uses.</p>
79/ 00010	Mr Harvey Bosomworth	<p>A combination of Option 3, with Bingley as a principal town, and a reduction in proposed growth for Ilkley and Wharfedale service centres. (See my letter). Bingley should be a principal town on all options – excellent transport mainline rail Aire Valley Trunk Road. Ilkley population is 13,000 – Bingley is 18,000!</p>

		<p>In terms of the four spatial options suggested in the LDF consultation document, I believe that a version of Option 3, with the additional of Bingley as a principal town, and corresponding reduction in growth in Ilkley & Wharfedale service centres, is the better alternative. Outside the main Bradford/Shipton/lower Baildon Sub Regional city, the Aire Valley offers good potential for housing and employment growth, for the following reasons;</p> <ol style="list-style-type: none"> 1. The Aire Valley corridor offers a well-developed transport infrastructure, with the benefit of the A650 Aire Valley Trunk Road and mainline rail access. 2. The town of Keighley is badly in need of regeneration and housing development could provide a keystone for this. 3. The potential offered by Bingley – I am surprised that Bingley has not been identified in all the four options as a principal town. Bingley has a population of 18,000 compared to 13,00 in Ilkley. It is far better served by transport infrastructure than Ilkley (see comment 1 above), and offers much better scope for employment growth.
80/ 00533`	Turley Associates on behalf of Mr Poolton	<p>My client has land interests in the main urban area of Bradford and, rightly, most of the development options allow for the majority of growth in these locations. We would favour any option which provides for significant growth in these locations. We would favour any option which provides for significant growth in and around Bradford as this is clearly the main focus of services and facilities in the District and along with target growth in other settlements, is the most likely to deliver sustainable forms of development.</p> <p>At this stage, we particularly support Option 1, as this provides for concentrations of growth in key nodes along with general expansion of the urban area (paragraph 4.11). We believe Green Belt releases to be required, and these should be focussed on areas where land performs poorly against Green Belt functions and where the site is sustainably located.</p> <p>We would support future options, which also allow for these points to be taken on board in allocating sites for development.</p> <p>More generally, however, we would suggest that the details of the housing split to each settlement should be subject of future consideration as the figures appear to be arbitrary, given the lack of firm evidence base, and they could be subject to rigid interpretation at later stages. The relevant proportion should be determined through a consideration of available and suitable sites, with both developer led representations and review work being utilised to identify suitable and deliverable opportunities.</p>

81/ 00534	Barratt Homes on behalf of Barratt Developments PLC	<p>Although the Council has chosen to seek views on four options, there are not the only options potentially available. However, it is recognised that a sensible limit has to be put on potential choices. Equally, it is recognised that the settlement hierarchy provided by the RSS should be followed. While this means concentration on the City thus accommodating more than 50% of development, there is no proportion set for Principal Towns and there is scope within an LDF for defining additional Principal Towns.</p> <p>Whilst individual Principal Towns should accommodate more development than individual Local Service Centres, there is no requirement for the Principal Towns as a group to accommodate more development than Local Service Centres as a group.</p> <p>Some of the development locations have specific disadvantages:-</p> <ul style="list-style-type: none"> • Large parts of Shipley and the Canal Road Corridor are subject to flooding; • Ilkley is highly constrained by its surrounding environment limiting its ability to expand. • Ilkley and Keighley are unlikely to have a sufficiency of Green Belt land available in view of their environmental constraints under any option. • South and East Bradford have limited land resources under any option. <p>Bearing these constraints in mind suggest that the Sub Regional City cannot accommodate 65% of the requirements without releasing significant areas from the Green Belt around the whole of Bradford/Shipley and that development in Ilkley and Keighley should be limited.</p> <p>Consequently, Barratt Developments PLC would support Option 4 but with the qualification that the search for sustainable development locations around Bradford in the Green Belt should not be limited to East of Bradford; all sites that can demonstrate they are sustainably located should be considered.</p>
82/ 00087	Metro	<p>Option 1</p> <p>We support the distribution of housing in Keighley, Bradford and Ilkley. However we do not support the Potential employment growth areas on the East side of Bradford. This is because they would be very difficult to serve by public transport in an effective, cost efficient manner. This would result in an unsustainable increase in traffic.</p> <p>Option 2</p> <p>We do not support the distribution of housing and employment across the district. Significant housing development in the Local service centres would be difficult to serve by public transport in an effective, cost efficient manner due to the dispersed nature of this proposal. We do not support the location of the employment locations to the east of Bradford for the reasons outlined above, although we welcome the inclusion of sites in Airedale</p>

		<p>Option 3</p> <p>The housing and employment distribution better reflects current thinking with regards to New Growth Points. We support the areas identified for housing growth but question the proportions, namely the small growth in Local Service Centres of 10%. We prefer 5% but recognise that a higher proportion may be required to fund affordable housing.</p> <p>The employment sites are more concentrated which means they would be easier to serve by public transport in an effective and cost efficient manner. We do not support the development of significant numbers of jobs in Holmewood due to the relatively poor public transport links (i.e. linear link into Bradford on the Core Frequency (10mins) 617/8 route) but recognise there may be a need to provide local employment in this area. The development of employment sites along Tong Street/Holme Wood could be explored further due to reasonable bus links to Heavy Woollen District/SW of Bradford. I would suggest this area undergo accessibility analysis to gain an understanding of its accessibility.</p> <hr/> <p>Option 4</p> <p>We are generally supportive of the housing distribution in this option, with the possible exception of the Local Growth Centres (LGCs) in Thornton and Queensbury because, although on Core Frequency bus routes they are linear in nature and thus not as accessible as the other LGCs that are better connected with the rail network. If Silsden is to be included as a LGC then significantly improved access is required between the settlement and Steeton and Silsden Station (e.g. bus services, a good quality cycle route and improved crossing facilities on the A629).</p>
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83/ 00535	Drivers Jonas on behalf of National Grid	<p>Our Client owns the land at Dockfield Road, Shipley (shown on the enclosed plan). Located to the south of Dockfield road and to the north of the Leeds to Liverpool Canal. On behalf of our Client, we have been engaging in pre-application discussions with Bradford Metropolitan Borough Council in relation to the suitability of the site for mixed-use development.</p> <p>It has been proposed within the emerging Core Strategy that the focus for proposed new residential developments take place within the Bradford city area including Shipley. Shipley falls within each Spatial Option relating to housing growth for the district and has few limitations and restrictions in relation to the disposition of residential development.</p> <p>The site falls within the <i>Dockfield Road Mixed Use Zone</i> as defined in the Airedale Masterplan. While this is not a statutory document, it is considered a material consideration for planning applications and is being taken forward as part of the development of Bradford's Local Development Framework (LDF) documents.</p> <p>With a population of over 16,900 people living in Shipley, the town offers an attractive place for residential development with frequent bus services and Shipley railway station providing rail links to Airedale, Wharfedale, Leeds and Bradford. The West Yorkshire Local Transport Plan has identified major public transport projects within Shipley – focused on connecting the bus interchange with the railway station.</p> <p>The role of 'Airedale Corridors: A Masterplan and Strategy for Airedale' is to cover issues in Shipley in light of competition from Leeds and Bradford in the consideration of spatial options, transport links and congestion. However, the purpose of this representation is to demonstrate our support for residential led growth in Shipley, as is also supported in the Settlement Study and accompanying Sustainability Appraisal. Sites close to the town centre benefit from high levels of accessibility and can play a key role in planning for climate change and delivering sustainable development.</p>
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84/ 00536	Drivers Jonas on behalf of Adare Group (Adare)	<p>Our Client owns land at Dockfield Road, Shipley. On behalf of our Client, we have been engaging in pre-application discussions with Bradford Metropolitan Borough Council about the suitability of the site for mixed-use redevelopment.</p> <p>It has been proposed within the emerging Core Strategy that the focus for proposed new residential developments be placed within the Bradford city area including Shipley. Shipley falls within each Spatial Option relating to housing growth for the district and is stated to have few limitations and restrictions.</p> <p>With a population of over 16,900 people living in Shipley the town offers an attractive place for residential development with frequent bus services and Shipley railway station providing rail links to Airedale, Wharfedale, Leeds and Bradford. The West Yorkshire Local Transport Plan has identified major public transport projects within Shipley – focused on connecting the bus interchange with the railway station.</p> <p>The purpose of this representation is to demonstrate our support for residential led growth in Shipley as also supported by the Settlement Stud and accompanying Initial Sustainability Appraisal. Sites close to the town centre benefit from high levels of accessibility and can play a key role in planning for climate change and delivering sustainable development.</p>
85/ 00537	Stephen Corbett	<p>1. Mismatch between location of dwelling units and the location of accommodation (all options)</p> <p>There is a mismatch between the potential growth centres and the location of accommodation. When I look at the maps of the options, it seems clear to me that there are not good transport links between the potential growth employment areas and Ilkley and Burley-in-Wharfedale and Menston corridor</p> <p>If the employment growth areas are going to be on the Bradford outskirts and around Keighley. How does it make sense to build in Ilkley and Burley-in-Wharfedale and Menston without improving the transport infrastructure (road and rail).</p> <p>How are people going to get to these employment areas? The current road infrastructure is already inadequate. To get to the supermarket I must travel to Ilkley or Guiseley but the road to Ilkley often gets clogged and now it is the same to Guiseley (due to growth of dwelling units and the road capacity). How is this going to improve with an increase in population. Are the Road links going to improve, is the train line going to improve. I would have thought that this was a pre requisite for growth.</p>

		<p>2. Options for dwelling units in Ilkley, Burley and Menston ignore Leeds. (All options)</p> <p>There has been substantial growth of dwelling units in Guiseley and surrounding areas (I don't know about Otley) this is ignore in these plans. Just because Ilkley, Burley and Menston are on the boundaries of North West Bradford you seem to ignore the growth of Leeds Metropolitan district. By growing Menston and Burley and ignoring Guiseley you would have built an urban area without adequate transport infrastructure.</p>
		<p>3. Inadequate Transport Infrastructure (all options)</p> <p>As stated in 1 and 2. The transport links (road and Rail) are already at there limits and by putting more people along the Menston – Ilkley road. How will they move around? The road to Ilkley and Guiseley from Burley often has bad traffic jams. Without addressing the transport infrastructure issue you are going to make things worst.</p> <p>The train link isn't much better. Already the trains are overcrowded with Leeds council going to put two more stations on the Ilkley-Leeds Line</p>
		<p>4. These options ignore people working in Leeds (all options)</p> <p>Many people who live in Ilkley-Burly and Menston corridor actually work in Leeds. So any growth in this area will not benefit Bradford – It will benefit Leeds.</p>
		<p>5. These options are vague. Where will the house go?</p> <p>I find all the options very vague. I cannot imagine where the houses will go? What do each of the different options mean for Burley-in-Wharfedale? What is the distribution of dwelling units between the different local service centres, I cannot tell. How many houses are going to be built here? And where they would be built, there might be locations in Burley that are acceptable but I cannot tell from these plans.</p>
		<p>6. More time for consultation. I have had no time to look at these plans. I only heard from someone this Tuesday. My comments are based on the Summary document. I wish I knew about these plans earlier.</p>
		<p>7. Putting more people under the flight path.</p> <p>Leeds Bradford Airport is set to grow by 100% over the next 5 years. The plane fly over us and by increasing the population more people will suffer from air population.</p>
		<p>8. Growth in Burley but inadequate community facilities. Burley hall has been closed for a year now and it is threatened to sell it to private developers.</p>

86/ 00214	Jo Griffiths, Burley Parish Council	The Parish Council does not feel that any one of the options is to be favoured we believe that there are alternatives to those offered that would more satisfactorily fulfil the criteria as outlined.
87/ 00538	W.L.Evans	<ol style="list-style-type: none"> 1. The housing requirement of fifty thousand dwellings over eighteen years seems excessive. How has the figure been derived? 2. Ilkley, Burley-in-Wharfedale and Menston are target areas for all options because of train connections to Leeds and Bradford. 3. The existing train system is grossly overloaded which is creating car parking problems at stations. Also the present station platforms are not long enough to accommodate additional carriages 4. The A65 and A6038 roads to Leeds, Shipley and Bradford are already over burden. Additional homes in these areas will create traffic deadlock. 5. Assuming one hundred thousand increase in population in 2026, new schools hospitals, and supermarkets will be required. 6. Water, sewerage and refuse disposal systems will require upgrading. <p>In my option, the infrastructure is presently inadequate to meet the needs of the four options proposed in your report.</p>
88/ 00539	Mr & Mrs Richterich	Mrs Richterich and I are totally opposed to any additional housing plans which impact on the appearance and quality of life in the Wharfe valley.
90/ 00541	Mr John Horton	Option 1
91/ 00542	Mr Andrew Mawson, Bingley Branch Labour Party	Option 4. Consideration should be given to small-scale employment development in former industrial villages. Why must all former mills become housing?
92/ 00543	Cllr Kathleen Brown, Ilkley Parish Council Planning Committee	Option 4 As stated before, Ilkley more connected to Leeds. Overloaded infrastructure already. Limited opportunity for jobs in Ilkley. Housing should be concentrated in job growth areas. Whilst saying the Option 4 would have been a preferred option, we do not consider even this to be feasible.

93/ 00544	Ms Joan Hyde	Growth should be dispute as suggested in Option 4 with the addition of housing growth in Bingley as in Option 2. Housing and employment should be sited as close as possible. No more than 50% of growth should be in the Sub Regional City.
94/ 00147	Cllr Howard Middleton	Great care needs to be taken using predicted demand housing projections. I still have a copy of the Ann Power Report on Housing in Bradford published a few years ago, which predicted a grave crisis of empty RSL housing running into thousands in Bradford Metropolitan District by 2010
95/ 00545	Sue Skinner	<p>Option 4, adjusted to cover following points</p> <p>Have we chosen the right settlements/areas for growth etc ...?</p> <p>Bingley is well provided with services and already has land available for extra housing. It has the character of a thriving town and could benefit from more sensitive development to ensure its future.</p> <p>Esholt is an attractive rural area. Is development here appropriate?</p>
96/ 00481	Jeff McQuillan	<p>I am greatly concerned with the scale of new housing needed across Bradford District, and am of the view that this will seriously erode the quality of the rural landscape, especially in Wharfedale.</p> <p>GREENBELT ISSUE/COMMUNITY SPIRIT</p> <p>My preference is for Option 1, because, with an average of 139 houses for the local service centres, this will nevertheless be a case of damage limitation in a village like Burley in Wharfedale that is slowly becoming a small town, bit by bit. It is important not to allow a rolling back of the greenbelt. If Greenholme Mills was to be approved at some future stage in part for residential units, then this should be part of the allocation for this village.</p> <p>I hold Option 1as my preference because there is a strong danger of Menston merging into Burley in Wharfedale. The distinctiveness of these villages is so important to identify. It is not just about separateness, but scale. If the village of Burley in Wharfedale gets too large, it tends to have less of a community spirit. This community spirit has been one of the hallmarks of the village, especially when it was well led by a community council. If incremental increases continue, there is a danger of losing this vital element in the make-up of this community. The village of Burley in Wharfedale has accommodated considerable growth already since the 1970s, and more recently with the Burley By-pass, when considerable housing infill occurred.</p>

		<p>LANDSCAPE CHARACTER AREA - WHARFEDALE</p> <p>I am asking Bradford Council to consider the overall effect of accommodating new houses in Ilkley, Addingham, Burley in Wharfedale and Menston in terms of the irreversible change of character of this precious dale within Bradford district. The moors and the open spaces around existing villages and towns gives Wharfedale a unique character, based on a proper balance between development and rural open space. The growth options for all the towns and villages in Wharfedale will be slowly changed and become so densely populated that the attractiveness of its existing character will be lost. Housing must be considered within the overall context, and the character of the valley as a whole needs to be carefully studied.</p>
97/ 00546	Yorkshire & Humber Assembly	The document identifies four Spatial Options for the Location of Development. The Assembly would support Options 1, 2, and 3 however; Option 4 would not be in general conformity with Policy YH8 of draft RSS.
98/ 00547	Mr Geoff Best	None of the options are acceptable as they all involve the release of Green Belt Land. Obviously some growth is inevitable but this could be achieved using Brownfield sites, without concreting over Greenfield Land, if more realistic projections of household growth were used.
101/ 00550	Anne Knott	Combination. Development in the flood areas of Airedale could be detrimental to transport links with Leeds as the railway, road and canal follow the valley bottom.

102/ 00551	Mr Joe Varga	<p>A Combination.</p> <p>Option 1 splits the requirements for accommodating growth between settlements identified in the RSS hierarchy with larger amounts of new housing planned for settlements further up the hierarchy, in accordance with the general principles of RSS. I support the way this approach concentrates development in the existing urban areas, close to existing infrastructure, jobs and services. However I do not believe the option 1 percentage splits adequately reflect the strategic direction provided by RSS. The percentages given would result in more significant growth of Keighley and Ilkley compared to more modest growth of Bradford. Bradford taking 65% of 50,000 is 32,500 homes added to a settlement of about 300,000 people. Assuming Keighley and Ilkley equally share the 30%: Keighley has 7,500 homes added to a settlement of about 50,000 people; Ilkley also 7,500 homes added to a settlement of about 14,000 people.</p> <p>These proportions fail to fully exploit the benefits of this hierarchy and, in my opinion, will prejudice the RSS objectives to focus growth in order to “transform” sub-regional settlements (YH5B) while only enhancing principle towns (YH6B). In the same way it undermines the RSS sub-regional policies for Leeds City Region within LCR1 that more explicitly state “transform Bradford” while only strengthening the service centre roles of principle towns. It is also clear that while these principle towns have rail connections to some of the city-regions main employment centres allocating such growth some distance from these centres will do nothing to reduce the need to travel (LCR1D1).</p> <p>In light of these thoughts it follows that I do not support the general distributions proposed in Option 2 (Bradford 50%), Option 4 (Bradford 65%) but feel that Option 3 (Bradford 70%) is the most suitable.</p> <p>I support the general areas for employment growth identified in option 1 noting their location near to the centres of population. As outlined previously I am particularly keen to see more jobs and a wider range in Airedale. Slightly altered locations within Airedale are presented in Options 2 and 4 but it is difficult to identify what they may mean, other than higher levels of growth. I feel it is important that these sites are easily accessed without a car so support growth limited to areas near rail stops and concentrated close to the existing settlements.</p>
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		<p>The lack of available land in Keighley is relevant to all options. However reducing the housing requirement for the town (discussed above) will provide more potential employment sites. We have to ask ourselves what is the most sustainable use of the land in the town- is it to provide greater and more varied employment options in accessible locations for the population of the town and its surrounding smaller settlements, making them more “sustainable communities”, or is it to provide more homes in an area with a narrow employment base where new residents will have to commute further to jobs and put extra strain on travel infrastructure? I also feel that some of the flood risk constraints are over stated because, for some sites, innovate design techniques and engineering solutions could mitigate risk substantially. However stronger local authority support (identifying best practice and/or public sector support) would be necessary to bring forward these more expensive sites forward.</p>
		<p>With the City centre being the most assessable location for all, I would also like to see more recognition of its ability to accommodate employment growth. This would support the vision for the centre and provide additional footfall that would improve vibrancy and support retail and service expansion.</p>
		<p>Local Service Centres accommodating 5% (options 1 and 4) seems to be a sensible balance between accommodating local needs, maintaining the centres viability and an acceptance that many of these settlements are not the most sustainable locations for new development. I see no evidence to suggest that accommodating 5% of the districts growth will cause these settlements as a whole to decline. I note that with option 4 this 5% is split between fewer settlements and will thus mean more homes for each. However I still feel these remaining local centres could adequately accommodate these levels.</p>
		<p>Option 3 proposes doubling the development in the local service centres to 10%. I do not think this level is required to keep the centres viable although some of the centres may be the most sustainable locations for some additional growth. However this option does not discriminate between centres suggesting a greater spread of development that will put more strain on existing infrastructure and make infrastructure improvements more difficult to realise</p>
		<p>In addition to Option 2 under stating Bradford’s need for growth I feel that its proposals, essentially the most dispersed growth option, is flawed. Being a continuation of the RUDP strategy, itself based on the UDP strategy, it is out of date with today’s context and is at odds with much of the YH policies in RSS.</p>

		<p>Option 2's identification of a number of local centres in which to concentrate growth is a positive idea. The greater economies of scale could allow: better master planning, to secure better quality and integrated developments; more infrastructure delivery; improved public transport; and overall greater benefits for the existing communities involved. However the choice of such centres should be based on criteria reflecting today's concerns, particularly relative sustainability merits, rather than where the most previously identified sites exist. Option 4's identification of local growth centres and housing growth points does this more adequately although I feel that too many free standing settlements are identified (the local growth centres) and their share of growth is too large, more growth should be focused in the housing growth points (in main urban areas) and the urban areas more generally.</p> <p>I do not think that Bingley needs to be classified a principle town, as suggested in Option 2. I do not think the settlement currently performs this function but designating it as such will take public and private investment away from Keighley and Shipley undermining their expansion and enhancement. Additional investment in the town may also end up under utilised since Bingley has excellent rail connections with a very accessible station that allows its residents to easily access retail, leisure and services in Keighley and Shipley along with those further a field in Bradford and Leeds. A more realistic suggestion for Bingley is included in Option 4 where it is proposed as a local growth centre. These developments would help safeguard existing retail, services and leisure within the town and be close to the accessible railway station. In my opinion Bingley has the strongest merits of all the potential local growth centres identified.</p> <p>As already stated I feel option 3 has the best proposed distributions, except in regard to the 10% for local service centres generally- where I feel specific local growth centres should be identified following the approach of option 4</p>
103/ 00552	Maura Fisher Peake	<p>With reference to the LDF Core Strategy consultations, I object to its findings because the amount of housing suggested for the Wharfe Valley/Ilkley area is too great for the local infrastructure to sustain.</p> <ol style="list-style-type: none"> 1) This town does not have the sufficient space without serious erosion onto Green Belt or the obvious hazards of the flood plain. 2) Affordable homes for essential workers are needed but not in the quantity recommended. 3) Local schools are full to capacity and local children are being forced to attend schools in other towns. 4) Population projections in your document are erratic and seemingly incorrect. The unreliability of the statistics does not give confidence that the housing need is as great as recommended. 5) The document is obtuse. We would appreciate a simplified statement and more transparent consultation process so that local people will understand what is being recommended. They can therefore pursue their democratic right to object, or not, as they see fit.

104/ 00553	Graeme Wilson	<p>Like most people living in Wharfedale, I am appalled at the prospect of yet more housing and associated infrastructure. I am also surprised and worried by the general lack of awareness on the part of the general public of this issue.</p> <p>We live in a country that is already grotesquely overcrowded, resulting in congestion, pollution and environmental degradation, not to mention a whole range of concomitant social and human problems. Wharfedale is one of the few areas that have managed to resist (or escape!) the worst effects of over-development. Speaking to people in the locality, a common theme emerges; THEY DO NOT WANT ANY MORE DEVELOPMENT! Not 30% or 20% or 10% but nought percent. This is not “nimbyism” because if you speak to people in towns and cities they also want places like Wharfedale preserved if only as a recreational developments spreading ever outwards! And nor do we!</p> <p>We object to any increase in housing in Ilkley, whether ‘brownfield’ or ‘greenfield’. We have already experienced an unacceptable level in the intensification of density in Ilkley over the last ten to fifteen years, and we are continually seeing examples of creeping urbanisation around the Otley/Menston/Addingham corridor.</p> <p>As a planning Department, why not take the courageous step of talking about the elephant in the sitting room, i.e. over-population. This could involve challenging both central and local government to have an intelligent debate with the general public about this subject. Allied to this theme is the issue of changing patterns of owner-occupancy i.e. the growth of single households.,</p> <p>The great environmental scientist James Lovelock (author of the Gaia hypothesis) has said that the optimum population for the British Isles is approximately 30 million people. We are already twice that number.....! To wish for reduction in the population, let alone a mere stabilisation, does not mean that one is a misanthrope or a fascists, it simple means that one is concerned about a healthy balance between man and nature. Let’s get real about this! We cannot carry on gobbling up huge tracts of land without the balance becoming horribly out of kilter and the consequences catastrophic.</p>
105/ 00011	Bradford Centre Regeneration	<p>Of the options presented BCR supports the development of Option 3, which concentrates development in growth points of the city centre, Canal Road Corridor, Esholt and Holmewood.</p> <p>Having read the documents out for consultation our main comments are that the description of Bradford and its role could do more to reflect the importance of the regeneration of the city centre, its potential and critical importance to the growth of the Leeds City Region. In addition there could be commentary on the crucial importance of an action plan for transport and the importance of a funding bid to provide financial support for the infrastructure needed to deliver regeneration in the Canal Road Corridor.</p>

106/ 00015	Bradford & Airedale Primary Care Trust	<p>The tPCT has no preference at this stage for any of the four Spatial Options, primarily because the sustainability appraisal does not quantify the impacts nor provide sufficient detail to make a direct comparison between the options in terms of health impact or health gain. Access to health services is clearly often easier in urban and suburban settings and planned growth in more rural areas will need to take account of travel and transport accessibility. Involvement of the tPCT in any future sustainability impact assessment would help us to distinguish between the options.</p> <p>The development of a comprehensive primary care commissioning strategy is a key priority for the tPCT over the next six months. The major focus of this strategy is the shape and face of primary medical services over the next 20 years. The tPCT is also considering the provision of pharmaceutical and optometry services and will build on the dental commissioning and oral health strategy that has already been approved resulting in dental care for an additional 20,000 patients. We are analysing current supply and demand and overlaying that analysis with known political, social, economic and technical developments. This work will dovetail with other developments such as urgent care, care closer to home and management of long term conditions. The resulting strategy will drive the investment in a primary care infrastructure that is able to respond to the changing needs. By 2011, patients across the whole of Bradford and Airedale will be able to access high quality primary medical care provided from modern facilities within their community. Our patients will be able to access primary medical care when they need and want it, in a way that suits them, and they will be able to exercise true choice, informed by high quality patient information. The preferred Spatial Option for the LDF, once finalised, will be a key driver for these crucial investment decisions.</p>
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<p>314/ 00763</p>	<p>Adele Gunn</p>	<p>My selection for the preferred areas of development was a combination of the Esholt Hall area.</p> <p>Obviously the government has sight of a bigger picture than the one outlined to us at the meeting so therefore it is hard to judge what type of homes were needed.</p> <p>I know that you used the phrase "affordable housing" but that is all relative. If you can foresee building more prestigious houses at the present - then making them fashionable town houses would be more appropriate with environmentally friendly attributes such as solar panels for heating and lighting and car sharing management systems, possibly with rooms suitable for ergonomically friendly home offices, catering for persons entering into less traditional jobs.</p> <p>If you are expecting an influx of European workers who will be replacing retiring workforce (bulge age workers) in traditional jobs then they may only need one bedroomed flats owned by a housing association as they will only be earning money in this country and will eventually, once they have saved up enough money, return to their roots - I expect that this type of build would need to be within the next 3 - 8 years.</p> <p>If the threatened depression comes to the country, may be we won't get an influx of people to work here at all and may be the people requiring homes required will be more of the fashionable town houses as discussed above because jobs will be more innovative.</p> <p>Certainly any building plans need to ensure that the sewerage system will cope with the new build and that any paving and foundations will not cause excessive amounts of run off of rain water and cause temporary (or worse) flooding in the lower ground.</p> <p>If you must build on flood plains then may be building on rafts or stilts should be considered.</p> <p>When I was at the meeting my main thoughts were that really you needed to just get the message over that 50,000 homes were to be built and we needed to be prepared to accept that. Certainly in the past Tony Blair has said "that you can't pay for a view" and I am sure that with the bigger picture in mind he was considering the massive need for more homes by 2026. In which case "social order" may be a key issue.</p>
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		I do believe that a good public transport infrastructure is essential to cut down individuals needing to travel by their own transport, but again in times of depression who will fund and maintain the cost of a good public transport infrastructure unless you decide to spend public money on public initiatives to keep the building trade in some work. I don't envy the government and the councils tasks ahead of you and all that I can say to you is if you want my help in any small way please consider that I would be willing to help
316/ 00769	Boyd Riddlesden	My first comment is that it is that most people were lead to believe that there were only 4 choices. It is very misleading in your documents and presentations to suggest that there are only 4 options, and that we have to accept one of them. This is clearly not the case. Over the 17 years that I have live in Shipley most of the local residents and neighbours have vehemently opposed any applications for buildings houses near us, we value nature, wildlife. Should not people be presented with a more informative, objective look at any plans for Bradford? You will soon discover that the suggestion of any extra/new houses or buildings, any more traffic would be extremely unpopular. If people were presented with a fifth choice, which included developing the existing buildings, creating some decent shops in the city centre, improving public transport and cleaning up the pollution and litter. Most local people believe that there are sufficient houses and properties already to meet the needs of the current and future population of Bradford. With a proper informative and objective presentation, I believe that most people would say no to all your 4 options. They have been misled into thinking that building is essential when it isn't, and that we have no choice when we have. It almost seems like propaganda for builders.
317/ 00076	Highways Agency	<p>In principle, the Agency would support any spatial option (or combination of spatial options) that seek to create sustainable mixed-use communities by locating employment, housing and a comprehensive range of community provisions together. Of course, locating mixed-use communities in areas accessible to existing or proposed sustainable public transport / rail corridors would be most favourable. Such practice will reduce the need to travel and encourage a mode shift to sustainable modes of transport, which has the potential to reduce the number of vehicle trips on the SRN.</p> <p><i>Option 1 (Regional Spatial Strategy settlement hierarchy option)</i> focuses the majority of residential growth and employment development in the 'Sub Regional City' of Bradford, Shipley and Lower Baildon. Allocating 30% of the housing requirement in the Principal Towns of Keighley and Ilkley would be relatively sustainable, due to the ease of commuting into Bradford and Leeds by train. Overall, development is not too sprawled across the district and locating employment and residential development together in the Skipton to Bradford rail corridor would reduce the need to travel to other parts of the region.</p>

		<p><i>Option 2 (Continuation of the Replacement Unitary Development Plan Strategy)</i> allocates 20% of the housing requirement, or 10,000 households in 'Local Service Centres' (namely Queensbury, Menston, Steeton, Thornton, Silsden, Denholme, Burley in Wharfedale and Baildon). Presently only Menston, Steeton, Burley in Wharfedale and Baildon are located within well-connected rail corridors. The Agency therefore considers that locating a significant amount of housing in the settlements of Queensbury, Thornton, Silsden and Denholme could increase the number of car trips. Although these settlements are not located in immediate proximity to the SRN, the Agency would support the need for significant improvements to sustainable transport options to and from these settlements if additional residential development were to take place.</p> <p>Again, clustering employment in the Skipton to Bradford rail corridor would complement the additional housing proposed in Keighley and Bingley, having the potential to reduce vehicle trips and encourage a mode shift. This spatial policy would therefore be supported by the Agency.</p> <p><i>Option 3 (Focussed growth points around the Bradford sub-regional city)</i> allocates 70% of the housing requirement, or 35,000 households in the sub-regional city. Within the Bradford sub-region, some of this additional housing would be located in a new settlement at Esholt and at Holme Wood (the latter would require an extensive Green Belt release). These settlements have also been identified as having potential for employment growth, which in principle is a sustainable concept.</p> <p>However, currently, neither of these settlements is connected to the rail network and although the proposed station at Laisterdyke may provide a rail connection to some residents in Holme Wood, the Agency believes that additional travel plan measures would be required to ensure sustainability. Without high quality public transport links and measures to reduce vehicle trips, the Agency would not consider Esholt or Holme Wood to be sustainable locations for additional housing growth. However, the Agency would support additional housing development in Bradford, Shipley and Baildon, due to the high level of access to sustainable modes of transport.</p>
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		<p><i>Option 4 (Dispersed growth points)</i> allocates 20% of the housing requirement, or 10,000 households in 'Local Growth Centres', (namely Bingley, Burley in Wharfedale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton), due to their position in key transport corridors. The Agency would support growth in those settlements with sustainable transport links. However, a significant increase of housing development in Queensbury and Thornton, which have limited sustainable transport infrastructure, has the potential to generate a significant increase of vehicle trips on the surrounding road network. As previously mentioned, the Agency would not support additional development in these settlements unless underpinned by firm commitments to improving sustainable transport by ensuring robust sustainable travel measures were in place. Again, significant growth is proposed in Esholt and Holme Wood, which would not be supported by the Agency unless the availability of sustainable transport options were significantly improved.</p>
		<p>The Agency commends many elements of the four spatial options, but could not support some of the concepts put forward. Currently, the Agency does not consider any one option to be ideal, and would therefore favour a combination of the options identified in the Core Strategy.</p> <p>In particular, the Agency would support the following spatial concepts:</p> <ul style="list-style-type: none"> • Focussing residential and employment growth in the Bradford, Shipley, Lower Baildon sub-regional city. • Locating residential growth with additional employment in Keighley, which would reduce the need to travel and the number of additional vehicles on the surrounding road network. Additionally, Keighley has sustainable transport links into other key employment centres in the region such as Bradford and Skipton. • Allocating additional housing in settlements on rail corridors (such as Ilkley, Burley in Wharfedale, Menston, Steeton with Eastburn, Bingley and Baildon). Growth in settlements without sustainable transport links would have to be supported by the implementation of robust sustainable travel measures.
		<p>Contrastingly, the Agency could not support:</p> <ul style="list-style-type: none"> • Significant growth in Holme Wood, Esholt, Queensbury, Thornton or Denholme unless significant efforts were made to improve the availability of public and sustainable transport. • Substantial employment growth on the M606 corridor, which would increase the number of vehicle trips on the M606 and therefore would have the potential to significantly affect the safe and efficient operation of the M606 and its connection to the SRN.

4. Core Strategy: Further Issues & Options – Responses to Question 4 – The Settlement Study

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
01/ 00320	Mrs Janet Cuff, Able All Physical Disabled Forum	No comment
07/ 00020	Bruce Barnes	No comment
21/ 00499	Robin Coghlan, Leeds City Council	The infrastructure matrices are useful. The study lacks assessment of land development capacity.
23/ 00045	English Heritage	Paragraph 1.3 The consideration of the effects of development on environmental resources should also include the historic environment and the landscape character and setting of the settlements.
		Paragraph 3.2 The Issues and Options Report recognises the importance of its historic assets to the character of the District. However despite having the third highest number of designated assets in the Region and one of only two World Heritage Sites in Yorkshire, no mention is made of this within this portrait of the District or, more importantly, the constraints that it might, potentially, place on further housing and employment growth.
		Section 4.2 et seq It is not clear why PPG15 and PPG16 are not included within this Section.
		Table 2D In terms of the historic environment, this is a somewhat simplistic assessment of the constraints it might present. Just because a settlement has a Conservation Area, does not, necessarily, imply that it cannot accommodate further development. As we have stated above, there needs to be a more robust analysis of the capacity of each of these settlements and their surrounding landscapes for further growth.
24/ 00488	Mr Vincent Shaw Victor Road Community Project	No

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
25/ 00113	West Yorkshire Archaeology Advisory Service	It is surprising to see in the discussion of Planning Policy Context in section 4 of Core Strategy Settlement Study which supposedly highlights Government policy and guidance to ensure sustainable development, the total absence of mention of Planning Policy Guidance Note 15: "Planning and the Historic Environment" and Planning Policy Guidance Note 16: "Archaeology and Planning" both of which are concerned with the sustainable management of the historic resource.
		The failure to have regard to the historic environment is also notable with regard to the absence of scheduled ancient monuments, conservation areas, registered battlefields and registered historic parks, gardens and cemeteries (all of which are present in Bradford District) from the environmental constraint maps included in the above documents. The environmental constraints map includes regionally important ecological sites but fails to includes nationally important archaeological and historic sites and landscapes. If the historic environment is to be treated with the same concern as the natural environment and in line with Policy ENV9 of the RSS, then the constraint map should logically include Class II archaeological sites (as defined in CBMDC's current Unitary Development Plan) and conservation areas as well as nationally important archaeological sites and historic landscapes (such as scheduled ancient monuments, registered historic parks, gardens and cemeteries and registered battlefields - terms which are also notably lacking from the glossaries in the above documents).
		Given the above it is perhaps not surprising that the historic environment receives little discussion when the profile of individual areas is discussed in the Settlement Study.
		There is no mention of the need to "conserve ...archaeological deposits in the region's cities and towns" (RSS ENV9 Section B.9). This will have implications in central Bradford, Ilkley and Keighley given their historic development and within other settlements in the District.
		There is no mention of the need to "conserve...Historic landscapes, parks and gardens" (RSS ENV9 section B.8) and thus there is no reference to the Registered Battlefield of Adwalton Moor when discussing Bradford South East, or to Bradford's registered parks, gardens and cemeteries other than Undercliffe cemetery in Bradford North East (which appears to gain mention because it is also within a conservation area).

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
		Again, although regionally and locally important ecological sites are discussed within individual settlements, only conservation areas are mentioned in the Settlement Study and prehistoric landscapes such as Ilkley Moor with dense concentrations of nationally important and protected ancient monuments are omitted, despite the RSS Policy ENV9 (section B.2) including "prehistoric landscapes" as priority areas where plans and strategies and programmes should conserve their distinctive elements, enhance their character and reinforce their distinctiveness.
26/ 00500	Hartley Planning consultants on behalf of Mr M Booth	<p>The study identifies that Ilkley has no land allocated as Phase 2 Housing Sites or Safeguarded Land. The four spatial options will therefore drive a requirement of significant Green Belt releases and enhanced intensification in the redevelopment of previously developed land in Ilkley. The cost of this approach will be the loss of employment land and very limited and small scale opportunities for new employment land growth.</p> <p>The study qualifies the environmental and policy constraints on large parts of Ilkley. It is considered, however, a full assessment is required by the council of these constraints and how they can be overcome by design e.g. schemes of compensatory flood storage. The focus for this work must be on sites of previously developed land.</p>
34/ 00505	Mr Alvin Norman Friends of Buck Woods	The availability of a sustainable infrastructure should be imperative in planning. Expansion should be in semi – isolated areas such as Ilkley, Addingham, Silsden, etc to avoid extra transport problems. Shipley should be treated and identified as a separate entity, not lumped in with Bradford. Areas such as Queensbury, Denholme should expand – especially with their links to Halifax; Silsden/Steeton to expand in relation to Craven area.
39/ 00508	Barton Wilmore on behalf of Wain Homes Ltd.	The Core Strategy acknowledges that neither the Settlement Study nor the other technical studies which will make up the Evidence Base have been completed. PPS12 states “ <i>Local planning authorities should prepare and maintain an up-to-date information base on key aspects of the social, economic and environmental characteristics of their area, to enable the preparation of a sound spatial plan meeting the objectives of sustainable development</i> ”.

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Settlement profiles:</p> <p>The same terminology is used with regard to facilities in both the larger and smaller settlements, for example the accompanying text for Wilsden and Menston when compared with that for Queensbury. As a result, the settlement study does not acknowledge the range of retail offer and services on the larger settlements. Not only do the larger settlements such as Queensbury have a much larger number and variety of shops, a choice of primary schools, a secondary school and other facilities such as doctors surgeries, but that also benefit from their own leisure facilities for example library and swimming pool. For these reasons Queensbury is far more a sustainable location and this is not emphasised in the draft Settlement study.</p>
42/ 00115	Michael Baldwin	We want to see any development close to the main areas of employment growth so to reduce requirements for travel to work. Any housing growth should be accompanied by investment in public transport to avoid increase in car journeys.
45/ 00081	Ilkley Civic Society	The designation of Ilkley as <i>Principal Town</i> in the same category as Keighley cannot be justified in the light of the data presented in the documentation. Keighley is more than three times the size of Ilkley and has far greater facilities in almost every category listed in the Settlement Study Table 2b. In most categories, Bingley and Baildon are much closer to Ilkley than Keighley and both have roughly similar populations. It should be pointed out that creating additional dwellings in Wharfedale does not tend to provide solutions to Bradford's housing needs but does provide more desirable dormitory facilities for people who work in Leeds. If this is the intention, the LDF should be realigned to cover both Leeds and Bradford as an individual unit of government.
48/ 00512	Burnett Planning & Development Limited on behalf of Tesco Stores Limited	Tesco is concerned that the Spatial Vision in Part 2 of the Further Issues & Options document (e.g. at paragraph 2.24) and the Settlement Profiles at section 7, Part 2 (XVI) does not identify the quantitative and qualitative need for additional retail floorspace in Queensbury.

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
49/ 00213	Cllr G. Metcalf Menston Parish Council	<p>The Core strategy document states that “Menston lies on the Wharfedale rail line with good connections to Leeds and Bradford”. Indeed this is the case except during early peak periods where the trains are well over capacity with people not being able to board the Leeds bound train (where the vast majority of jobs are) at Guiseley and from Burley and Menston people are having to stand. The problem exists similarly in the reverse direction from Leeds to Ilkley where the train is over capacity from source. Increasing the carriages and extending platforms is an expensive option (noted as £8m per year for 30 years) that would not be obtainable from Developers but would require government funding. Increasing the number of trains into Leeds during the peak period is not possible as Leeds station cannot cope with the additional demand. Any increase in housing in the valley will put a strain on car parking at Menston where currently the situation is that people travel from all parts of the valley (including Guiseley) to park.</p>
		<p>The roads to and from Leeds and Bradford are currently gridlocked and will worsen as new developments take place. Road travel from Menston will inevitably be seriously affected by developments within the Leeds District at High Royds, Crompton Parkinson’s, Moons and Silver Cross and further towards Leeds at Kirkstall. The document states that 65% of the population travel over 5km to work however the reality is that from Menston the major employment centre is Leeds, and not just the centre which is accessible by train, but also the outlying areas to the South and East of the city necessitating road travel. Consequently journeys of 15-25km are common and travel times along gridlocked roads are possibly up to 2hrs. The Bus service is acknowledged in the Document as not being good from Menston to these areas however the creation of bus lanes and widening of the roads is not feasible on many sections. The ecological affect increased road usage creates must also be considered which is contrary to the LDF objective of “reducing congestion and pollution by increasing transport choice and by the need to travel by lorry/car”</p>
64/ 00523	Dacre, Son & Hartley on behalf of Taylor Wimpey UK Ltd	<p>The list of supporting documents at paragraph 3.5 should be available now and should inform the preparatory stages of the Core Strategy. The spatial distribution of growth within Bradford should be informed by an up to date evidence base. The fact that the SHLAA and SFRA are not available, the Urban Potential Study is not yet available and there is no SHMA, are significant failings. Paragraph 3.6 states that these documents and studies will inform the content of a revised Settlement Study, but these documents and studies should have informed the content of the further issues and options Core Strategy – Settlement Study, in order to allow meaningful and informed responses. The new planning system is meant to be ‘front loaded’, but in this instance the lack of vital documents that form the evidence base is contrary to Government guidance and makes it difficult to choose a most appropriate option in terms of the future distribution of development.</p>

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Despite the fact that the Employment Land Review has yet to be published paragraph 4.22 of the Settlement Study summarises the findings, stating that:</p> <p style="padding-left: 40px;">“The study found that economic growth is likely to be focused in Bradford City Centre and the regeneration areas in Canal Road and Airedale. General industrial, storage and distribution uses should be concentrated around the M606. Airedale will see a growth of digital and creative industries, but Keighley will require some intervention to improve the quality of sites and therefore the perception of the town as a place to locate.”</p> <p>This is not a transparent approach and the Council should not summarise the Employment Land Review for use in the Core Strategy when it is not published and cannot be scrutinised as part of this consultation exercise.</p> <p>Figure 1 - Methodology within the Settlement Study identifies the addition of baseline data at a very late stage in the development of a settlement hierarchy. The information that will be made available just prior to the preferred option stage includes an Employment Land Review, Urban Capacity/Potential Study and a Retail Study. Surely this information is vital in understanding the settlement profile, characteristics and future potential, and as mentioned previously, is important in developing the spatial options. Furthermore, Figure 1 makes no reference to the findings of a Strategic Flood Risk Assessment.</p> <p>The information in a fully informed Settlement Study is crucial in the development of the spatial options for identifying the future broad location of housing and employment.</p> <p>The last two sections of the Settlement Study, Sections 6 and 7 provide a profile of the Bradford Main Urban Area (the 7 areas within this area) and individual profiles of 20 settlements. While this provides a brief overview and summary, it does not provide any options for consideration, in terms of any settlement hierarchy, or which settlements are considered capable of delivering growth. A full analysis of the role that settlements play within the District is lacking.</p>
65/00524	Mrs Lesley Bosomworth	<p>The capacity of the existing facilities identified in communities should be taken into account upgrading of these to unlikely to be achieved <u>or</u> funded before further housing development schools in the Wharfedale areas are over capacity now (e.g. Bunk’s Primary School and Ilk ley’s Grammar School). Conservation areas and areas of outstanding beauty need to be protected and respected. Villages also need their identities and characters preserving. There should be <u>no merging</u> of communities as seems to be indicated on option 4 for Menston and Burley – see previous sections for road and rail comments.</p>

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
66/ 00021	Mr John Grundy	The draft was not available at Ilkley Planning Office (at the late stage that I asked for it).
67/ 00525	Ms Josephine Vento	In the case of Burley, the adequacy of infrastructure to support the population is exacerbated. Consequently the assumption of the ability to accommodate additional population growth is also exaggerated.
70/ 00527	Natural England	Natural England welcomes this well presented settlement study which takes into account issues such as the availability of accessible green space and transport issues in settlements. It also notes the availability of previously developed land in areas such as Bradford South East. It will be important that the potential of this land is given full consideration in the spatial options before considering green belt releases. However, it should be noted that some sites may have biodiversity or amenity potential, which should be retained or incorporated into development in line with PPS9 / PPG17. Some sites may also have local nature conservation designations.
		Natural England notes that some areas, such as Shipley, suffer from poor access to green space and healthcare services. As stated previously, Natural England promote the ANGSt standard, recognising that accessible natural green spaces can play an important role in increasing physical activity and thus contributing to wellbeing. Opportunities to create and enhance open spaces in these areas should be taken, and City of Bradford will be able to draw from evidence in their Open Space, Sport and Recreation Study to support this, in line with PPG17. Furthermore, Natural England have produced maps of the accessibility of natural green space in Bradford district, following the ANGSt hierarchy. We are happy to discuss this project further with you.
		Natural England notes that the description of Bradford North West highlights that the Manningham community has raised the issue of 'a distinct lack of and protection of open space within this area' in paragraph 6.8, while the preceding paragraph describes Bradford Wildlife Areas that double up with existing areas of urban green space. We would advise that there may be potential to designate such sites as Local Nature Reserves ⁵ if the Local Authority has a legal interest in these sites. This would help provide the protected open space that the community requires, and could act as a vehicle for increasing community involvement in the management of sites. Extension of green space or provision of new sites in the area could contribute to meeting the ANGSt targets.

⁵ Information about the benefits of declaring LNRs and how they can be managed for the benefit of the community and wildlife can be found at <http://www.english-nature.org.uk/Special/lnr/office.htm>

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
72/ 00200	Yorkshire Water	The settlement study should take into account existing capacity in local infrastructure and also the ability to provide additional capacity to meet future growth. Yorkshire Water can provide information on our infrastructure's capacity for each settlement identified over the coming months.
73/ 00529	Dacre, Son & Hartley on behalf of Clays of Addingham	<p>The list of supporting documents at paragraph 3.5 of the Core Strategy – Settlement Study should be available now and should inform the preparatory stages of the Core Strategy. The spatial distribution of growth within Bradford should be informed by an up to date evidence base. The fact that the SHLAA is not available, the Urban Potential Study is not yet available and there is no SHMA, are significant failings. Paragraph 3.6 states that these documents and studies will inform the content of a revised Settlement Study, but these documents and studies should have informed the content of the further issues and options Core Strategy – Settlement Study, in order to allow meaningful and informed responses. The new planning system is meant to be 'front loaded', but in this instance the lack of vital documents that form the evidence base is contrary to Government guidance and makes it difficult to choose a most appropriate option in terms of the future distribution of development. These comments also apply to the Strategic Flood Risk Assessment.</p> <p>Despite the fact that the Employment Land Review has yet to be published paragraph 4.22 of the Settlement Study summarises the findings, stating that:</p> <p>“The study found that economic growth is likely to be focused in Bradford City Centre and the regeneration areas in Canal Road and Airedale. General industrial, storage and distribution uses should be concentrated around the M606. Airedale will see a growth of digital and creative industries, but Keighley will require some intervention to improve the quality of sites and therefore the perception of the town as a place to locate.”</p> <p>This is not a transparent approach and the Council should not summarise the Employment Land Review for use in the Core Strategy when it is not published and cannot be scrutinised as part of this consultation exercise.</p> <p>Figure 1 - Methodology within the Settlement Study identifies the addition of baseline data at a very late stage in the development of a settlement hierarchy. The information that will be made available just prior to the preferred options stage includes an Employment Land Review, Urban Capacity/Potential Study, SFRA and a Retail Study. Surely this information is vital in understanding the settlement profile, characteristics and future potential, and as mentioned previously, is important in developing the spatial options. The information in a fully informed Settlement Study is crucial in the development of the spatial options for identifying the future broad location of housing and employment.</p>

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
		The last two sections of the Settlement Study, Sections 6 and 7 provide a profile of the Bradford Main Urban Area (the 7 areas within this area) and individual profiles of 20 settlements. While this provides a brief overview and summary, it does not provide any options for consideration, in terms of any settlement hierarchy, or which settlements are considered capable of delivering growth. A full analysis of the role that settlements play within the District is lacking.
76/ 00531	Walker Morris on behalf of Mr & Mrs Hopwood	The Draft Settlement Study has been based on the settlement hierarchy as outlined in the Regional Spatial Strategy. This accords with the tests of soundness as prescribed in PPS12: Local Development Frameworks.
		The way in which the study has been carried out is also supported, basing it on the principles of sustainable development as prescribed by PPS1, PPS3, PPS6, and PPG13. It seems to have been carried out in a logical manner.
		Perhaps it would be more useful to highlight the fact that Keighley and Ilkley are the Principle Towns and include them in a section of their own.
		The tables of information are useful and should be updated annually to accurately reflect the services and provisions in each settlement.
77/ 00532	Carter Jonas on behalf of Mr Tony Kemp	From an overview of the Settlement Study it would appear that a hierarchy of settlements does emerge based on the population, facilities and employment opportunities available in each centre. No analysis is made and it does not seem to follow through in to the Issues and Options document. A more considered conclusion from the Settlement Study would have been useful.
78/ 00083	Mrs Christine Dale Ilkley Parish Council	A) Infrastructure again Topography B) Those areas with the space and the need
79/ 00010	Mr Harvey Bosomworth	Yes. Why no comments on the importance of conserving the character of the conservation area of Burley and Wharfedale. See comments on Bingley in the study. Again Wharfedale is poorly served by single-track branch line – not mainline service as in Airedale.
91/ 00542	Mr Andrew Mawson, Bingley Branch Labour Party	Infrastructure is vital. Integrated Transport system schools and health facilities must be considered.
92/ 00543	Cllr Kathleen Brown, Ilkley Parish Council	Consider Ilkley should not be classified as a Principal Town but a 'Local Service Centre'. Aire Valley and Bradford quite better options for growth.

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
	Planning Committee	There are no indications/mention as to the infrastructure that would be required for the Options such as schools, roads, water and sewerage, medical facilities and it is considered that the whole of the Wharfe Valley would not be able to provide what is being proposed.
93/ 00544	Ms Joan Hyde	Infrastructure should be dealt with first. A Shipley eastern by pass is desperately needed to take traffic directly from Otley Road, Baildon and Shipley Centre. A plan of this road should be available before other building is decided on.
94/ 00147	Cllr Howard Middleton	If Shipley Canal Corridor is to be developed, Canal Road must be made fit for purpose as a major Access Road first. The road is already gridlocked with existing traffic and development. New primary school place, would need to be provided for Poplars Farm BD2 to meet needs generated from the new Housing in the Shipley/Bradford Canal Corridor.
95/ 00545	Sue Skinner	<p>4.5 Planning Policy Statement 3:</p> <p>The provision of a mix of housing types adjacent to each other in small local areas would help promote the sense of community, e.g. small blocks of flats, single and multiple occupancy houses (terraced, semi or detached). This would bring a mix of ages/families/young and old singles to an area. There is no specific mention of the provision of housing suitable for older citizens anywhere in the Core Strategy documents. In view of the ageing population the provision of suitable retirement and sheltered housing as well as Care Homes is vital. Older citizens can make a valuable contribution to communities.</p> <p>4.12 Regional Economic Strategy</p> <p>This should include the promotion of local shopping/markets with suitable accommodation as well as the provision of multi-use community centres (which could include IT provision; help promote local enterprise) and starter units/serviced accommodation for self-employed businesses.</p> <p>4.16 Community Strategy</p> <p>Add: To encourage a sense of local community across age and ethnic ranges. This should include the long-established but diverse white communities (Italian, Ukrainian, Polish, Irish, etc.). Many of these have their own local Associations which could make diverse and valuable contributions to ensure the future success of the area.</p> <p>4.18 Bradford District Transport Strategy</p> <p>Add: ... connectivity and congestion within the District and surrounding areas (e.g. further west etc.).</p> <p>Also to consider the promotion of commercial and freight transport by rail.</p> <p>4.20 Local Housing Assessment (2008) Question: what is BME population?</p>

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
		<p>5.0 Methodology</p> <p>5.1 Add: Bingley as a Principal Town.</p> <p>Sustainability</p> <p>5.9 Add analysis of: Local employment opportunities for service and self-employed jobs.</p> <p>Remaining Settlement Profiles</p> <p>III Bingley Has good facilities per head of population and potential for further development.</p> <p>XII Keighley Has good local employment and there is scope for development both in new high tech industries and also the exploitation of current (and past) skills, e.g. engineering.</p> <p>XIII Menston No mention of large new 'village' on old hospital site.</p>
97/00546	Yorkshire & Humber Assembly	<p>The Assembly is encouraged that paragraph 1.3 states that this study will build upon the RSS Settlement Study (2004) and clearly states that it has evolved from the concept of a settlement study, as set out in the RSS. The document clearly lists the Local Service Centres identified in the Settlement Study (2004) in the Bradford District: Addingham, Bingley, Burley in Wharfedale, Denholme, Harwood/Crossroads/Lees, Menston, Queensbury, Silsden, Steeton with Eastburn and Thornton.</p> <p>Paragraph 5.5 goes on to identify settlements that have also been included in this study: Baildon, Cottingley, Cullingworth, East Morton, Harden, Oakworth, Oxenhope and Wilsden.</p> <p>The Assembly supports the document as providing up to date local evidence to support the LDF. We are also encouraged that a clear and robust methodology that will feed into the evidence base has been used to assess the sustainability of the settlements for future development such as: key services and facilities within the settlement; the proximity of the settlement to a railway station and/or a high frequency bus route; the propensity to commute to another location for employment; and environmental constraints to further development.</p>

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
		The Secretary of State's Proposed Changes to Draft RSS (2007) Policy YH6 states that LDF's may exceptionally include other towns provided that they are consistent with the Core Approach and that they; provide employment, community facilities and services for local and surrounding populations; and have good accessibility by public transport to Regional Cities and Sub Regional Cities; and have capacity to accommodate development in accordance with Policy YH8 without harm to the town's environment and character; and have potential to develop a role that complements and supports the wider settlement network.
98/ 00547	Mr Geoff Best	The number of available school places – primary and secondary Health Services available in each area. Traffic impact assessments Employment Opportunities Specific details on Public Transport
101/ 00550	Anne Knott	I feel it would be a good idea to check the accuracy of the data. E.g. library in Haworth- where two supermarkets in Haworth – where the second one.
102/ 00551	Mr Joe Varga	I haven't gone through this in any depth but a quick read has raised questions about the data collection, analysis and validation used. For example: Data: Oakworth has no supermarket while Haworth has 2- no matter how you define a supermarket, this is not correct. Analysis: "A relatively high proportion of the population travel over 5km to work but Keighley town centre is within 5km of the village so this may mean that a high number of residents work in Keighley" What does this mean, does it make any sense? "Oakworth is also close to the designated SEGI at Newsholme Dean, which is by the River Worth" Newsholme Dean is on the North Beck not the river worth

HAVE YOU ANY COMMENTS ON THE DRAFT SETTLEMENT STUDY?		
Rep ID	Name / Organisation	Summary of Representation
		<p>Admittedly the examples I've highlighted could easily be missed during production but glare out at me because they concern the area where I live. I don't know what kind of validation procedure has been used for the document but would suggest that the pure facts relating to a settlement be given to competent people local to those areas to check through prior to publication (e.g. town/parish councils, civic societies etc).</p> <p>I hope that the Oakworth and Worth Valley entries are not indicative of the document as a whole and while I note that this is only a draft I hope that further work will be done to ensure the accuracy of the raw data and to improve the quality of the analysis. After all if decisions about where to locate development are to be, in part, based on the study it is imperative that it is accurate.</p>
105/ 00011	Bradford Centre Regeneration	<p>Paragraph 2.3</p> <p>This statement may well require modification once the final version of the RSS is adopted and Bradford designated as a Regional City.</p>
		<p>Paragraph 3.5</p> <p>The document could include a reference to Transport Policy, Planning and Strategy. (i.e. Transport Delivery Plan 2008/09).</p>
		<p>Paragraph 6.17</p> <p>It would be helpful if the number of employees in the public sector in the city centre was quantified.</p>

5. Core Strategy: Further Issues & Options – Responses to Question 5 – Sustainability Appraisal

HAS THE INITIAL SUSTAINABILITY APPRAISAL COVERED ALL THE RELEVANT ISSUES?		
Rep ID.	Name / Organisation	Summary of Representation
01/ 00320	Mrs Janet Cuff, Able All Physical Disabled Forum	Put pressure on railway board to open Apperley Bridge and other rail stations.
07/ 00020	Bruce Barnes	<p>No.</p> <p>The location of takeaways was considered when the Planning Sub-Committee of the Council approved a “Policy for Cafes, Restaurants and Takeaways in the Bradford District” on 24th January 1983. It was prompted by public concern about the increasing number of hot food takeaways and cafes, and some of their effects, particularly opening hours, but also including litter.</p> <p>One of the three policy approaches considered was to only allow such establishments in the City Centre and the other main centres, such as Keighley, Ilkley, Shipley and Bingley. This was rejected as it “would be very restrictive and would be unfair to many people who want to buy a hot supper but don’t want to travel a long way to get it”.</p> <p>The LDF provides the only opportunity to review a policy that no longer accords with its original aims and is materially affecting the quality of life in Bradford. A review of the policy should reconsider the option of allow such takeaways in the City Centre and the other main centres, such as Keighley, Ilkley, Shipley & Bingley. Such an option would have the following benefits:</p>
17/ 00016	Susan Stead, Bradford Urban Wildlife Group	<p>Is the biodiversity of the Aire Valley – landscapes etc really going to be protected and enhanced? Every one of the four options refers to the continual impact purpose of the green belt. What part of the green belt will be taken away? And how through Government inspector?</p> <p>Page 14 – Sustainability Appraisal – states ‘Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats. How? Who will decide, some are in the green belt.</p> <p>There is no way you can have all this housing unless its centred on the city centre and main towns. Development must be taken away from the Aire Valley and river / canal – because of its biodiversity and landscape. Why do we have to have all the people coming into Bradford? We can only hope for a change of government which will protect the green belt. I am not pushing party politics but our Shipley Rep has made it clear on protecting the green belt.</p>

21/ 00499	Robin Coghlan, Leeds City Council	Insufficient emphasis on differences between the spatial options in terms of generating vehicular traffic and increases in pollution & CO2 emissions.
23/ 00045	English Heritage	<p>Draft Sustainability Appraisal Objectives</p> <p>The SEA Directive requires SEAs to consider the likely significant effects of the plan upon “<i>cultural heritage including architectural and archaeological heritage</i>”.</p> <p>As currently proposed, one would presume that the majority of the historic environment would fall within the “<i>Land Use</i>” Objective. However, the second topic under the “<i>Natural Assets</i>” Objective which deals with man-made landscapes could, potentially, include Historic Parks and Gardens. It would be more logical if all the historic assets were dealt with under the one Objective. This would leave the “<i>Natural Assets</i>” Objective simply covering wildlife, habitats and landscapes (although it would be preferable to simply refer to “<i>landscapes</i>” which would overcome the issue of whether one can refer to “<i>man-made assets</i>” as being “<i>natural</i>”).</p> <p>However, even if all the historic assets are grouped together, we have reservations about incorporating the historic environment under the “<i>Land Use</i>” Objective. This is a composite Objective containing three distinct elements - design quality; the historic environment; and the efficient use of land. Whilst there is undoubtedly a link between the first two elements, the connection between the historic environment and making better use of land is somewhat tenuous. It would be quite possible, therefore, to achieve a positive outcome for one aspect of this SA Objective yet, at the same time, have an adverse impact upon another. For example, the Council might embark upon a strategy which sought to increase the heights of buildings and a commitment to higher densities within the City centre. Whilst such a strategy would undoubtedly score highly against the “<i>making more efficient use of land</i>” Objective, it could, potentially, have an adverse effect upon the character of the District’s Conservation Areas or the setting of its Listed Buildings. In scoring this strategy, a positive score for “<i>the efficient use of land and buildings</i>” Objective would be cancelled out by a negative score for the “<i>protecting and enhancing the historic environment</i>” Objective. Thus, rather than being able to clearly identify likely effects of such a strategy, it is more likely simply to result in an “uncertain” scores in the assessment.</p>

		<p>Consequently, we consider that there should be a separate SA Objective relating to the historic environment (in a similar manner to that proposed for biodiversity). This approach has been adopted in the vast majority of SAs/SEAs which have been produced around the Region and is one where it can be clearly demonstrated that the Assessment has met the Directive's requirements insofar as considering the likely significant effects of the plan upon <i>"cultural heritage including architectural and archaeological heritage"</i>. We would suggest an Objective along the lines <i>"Protect and enhance the historic assets"</i>.</p>
		<p>Paragraph 1.5/1.6</p> <p>Given that this is a first initial assessment of the likely impacts which each of the various Options might have, we would broadly concur with the effects identified in Section 3.0. However, it would have been useful for the Sustainability Appraisal to highlight the areas where more research is required in order to identify the most sustainable Option.</p> <p>A large number of the settlements being proposed as Principal Towns, Local Growth Centres and Local Service Centres have historic cores which have been designated by the Council as Conservation Areas. Most also contain several Listed Buildings. In view of the recognition within the Vision of the importance of a high quality environment to the future wellbeing of the District, the procedure for selecting settlements for potential development should include an assessment of the capacity of each of those settlements to accommodate further growth without compromising either their historic character or their wider landscape setting. The latter is especially important given the topography of the District and the relationship of its settlements to the landscape.</p>
		<p>Table 2</p> <p>It is not clear how the Sustainability Appraisal Objectives detailed in this Table relate to those detailed in Appendix 1. In the Table there are 14 Sustainability Appraisal Objectives: in Appendix 1 there are 18. It would be preferable (and more logical) if the Plan's Objectives were assessed against each of the Sustainability Appraisal Objectives detailed in Appendix 1.</p>
		<p>Table 2</p> <p>As stated above, we have reservation about the proposed Sustainability Appraisal Objective which covers the historic environment. In terms of the historic environment, the following DPO Objectives could, potentially, be in conflict with the need to preserve/enhance the historic assets of the District:- 1, 2, 4, 5, 6, 8, 9, 13</p>

		<p>Table 2</p> <p>This Table identified a number of potential conflicts between the SA Objectives and the DPO Objectives. It would have been useful, in developing the Plan, if this stage of the SA had also put forward some suggestions as to how this conflict might be resolved.</p>
24/ 00488	Mr Vincent Shaw Victor Road Community Project	Yes
25/ 00113	West Yorkshire Archaeology Advisory Service	Failure to consider the historic environment has led to the absence of the historic environment from consideration in the Initial Sustainability Appraisal (other than mention of Saltaire World Heritage Site within a discussion of Environmental Impacts) and consideration of the historic environment is notable by its absence from the matrices considering the sustainability appraisal of the draft core strategy plan objectives.
26/ 00500	Hartley Planning consultants on behalf of Mr M Booth	<p>The Sustainability Appraisal does not review the impacts all spatial options will have in continuing Ilkley's role as a commuter town. The spatial options will lead to a continuation and addition to the existing percentage of the population travelling over 5km to work; at 57% now, this is a figure that is wholly unsustainable. Ilkley needs to become a more self contained settlement, provide for jobs as well as houses and therefore bring more sustainable patterns of travel and greater social cohesion.</p> <p>The appraisal does refer to the intense pressures on brownfield land in Ilkley. It does not qualify what impact this has had and will have in the future on employment land provision. A revised option must highlight the need to provide for a more balanced community at this Principal Town and surrounding area and protect the limited existing employment land supply and provide for new employment land.</p>

27/ 00194	Environment Agency	<p>We are surprised that the spatial distribution options have not been assessed against the Objectives in your Sustainability Appraisal. This would seem a logical process at this stage, to appraise which is likely to be the most sustainable option. It would allow participants to comment on the relative weight given to different factors, and to make comments on what should subsequently be the Preferred Option.</p> <p>There is also a notable absence of a section detailing the plans, programmes and strategies which will inform the Sustainability Appraisal. It is important that these are cited in full so that the robustness and credibility of your evidence base can be assessed.</p> <p>You should be aware that the Environment Agency's River Aire Catchment Flood Management Plan is currently out to consultation and should be considered fully in the Core Strategy.</p>
34/ 00505	Mr Alvin Norman Friends of Buck Woods	<p>No. There has not been sufficient planning to safeguard wildlife in the area. There must be links between woods, fields, rivers etc to allow wildlife to migrate and prevent the demise of communities under stress and threat from extension. Too much development on the edge of woods, rivers etc, creates too much use of these areas – destroying the very nature of the area. The Aire Valley should be avoided for major expansion; services are already under stress and could only be alleviated by major construction of roads etc., which would destroy the very nature of this corridor.</p>
42/ 00115	Michael Baldwin	<p>No. Possibilities for reducing expected growth in housing requirements have not been considered, e.g. more intensification in all areas.</p>
51/ 00101	Sanderson Weatherall on behalf of Royal Mail Group Property	<p>The transport network, particularly the road network, is important to the ongoing operation of RMGP due to the collection and distribution process in the district. The proposed housing and employment growth identifies in the options is likely to have a significant impact on the existing infrastructure.</p> <p>Whilst the Sustainability Appraisal comments on “greater pressure on infrastructure” and the objectives of the Core Strategy for improved public transport and better transport connections we consider further information and consideration is given to the impacts on the proposed growth on the existing infrastructure.</p>
54/ 00084	Sanderson Weatherall on behalf of Keyland Developments Ltd	<p>It is considered that the Sustainability Appraisal has addressed the relevant options, but its status as “initial” must be stressed and additional detailed sustainability appraisal of options will be needed, prior to selection of a preferred option.</p>

57/ 00518	Sanderson Weatherall on behalf of GMI Waterside Shipley Ltd	Yes.
64/ 00523	Dacre, Son & Hartley on behalf of Taylor Wimpey UK Ltd	While the Initial SA may cover all relevant issues, we have substantial concerns over the evidence base that will be used to make the SA assessments. These concerns are set out in our submission.
65/ 00524	Mrs Lesley Bosomworth	No. Bradford is a very diverse city both geographically and with regard to population there doesn't seem to be a mention of Menston or Burley-in-Wharfedale as a money maker – more housing – very little affordable to ordinary people and hence of higher value generating more Council tax. Wharfedale has its needs too not just inner City Bradford development in Wharfedale needs to be sympathetic to the location and supported with better infrastructure.
66/ 00021	Mr John Grundy	Bradford District will be overwhelmed by Leeds developments unless vigilantly and vigorously defended but the Vision and the Appraisal, like previous District planning papers, barely mention Leeds. Whatever the protocol, the Appraisal (and the option maps) should have at least indicated the pressures from the East and suggested means of diverting the pressure other than up Wharfedale.
67/ 00525	Ms Josephine Vento	No. In the case of Burley, the adequacy of infrastructure to support the population is exacerbated. Consequently the assumption of the ability to accommodate additional population growth is also exaggerated.
68/ 00062	Nathaniel Lichfield & Partners on behalf of Hallam Land Management	Representations have been considered against the initial SA and it is considered that the proposed references to Safeguarded Land to the west of Bradford could have a positive impact on the sustainability of the options. This could reduce the need for Green Belt releases elsewhere in the district.
70/ 00527	Natural England	Natural England recognises that the document presented is an 'initial sustainability appraisal'. It is important that this document is recognised as being limited in its scope and that a full sustainability appraisal report will be required with the presentation of preferred options, in line with the process for sustainability appraisal of DPDs outlined in ODPM's 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' ⁶

⁶ ODPM, 2005. Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, London

		<p>Natural England have already commented on the Sustainability Appraisal Scoping Report in letters date 2nd April and 16th April and advise that the comments in these letters be taken into account. However, we welcome the SA's suggestion that developments affecting green belt land would need to be assessed in terms of the role and purposes of green belt and impact on green infrastructure, landscape character and biodiversity. This is broadly in keeping with the comments we have made earlier in this letter.</p>
		<p>We also welcome assessments of impacts of the impact of additional development on the Saltaire World Heritage Site and assessment of the impacts of expanding small-scale settlements on local distinctiveness and heritage assets. We would welcome further consideration of how increased housing will affect sensitive townscapes, such as the conservation areas identified in the Settlement Study. It will be important that areas that have a strong sense of place are appropriately conserved, whilst areas without such a sense of local distinctiveness are enhanced through appropriate development. Use of concept statements to identify environmental, social and economic objectives for development sites is one mechanism for achieving this⁷.</p>
		<p>Whilst we acknowledge the comments in relation to the South Pennine Moors SPA we would advise that, as well as informing the SA, the Habitats Regulations Assessment will need to consider the significance of direct, indirect and in-combination impacts of the Core Strategy to ensure the integrity of the SPA (which is also a Special Area of Conservation) and other SPAs, SACs or Ramsar sites are scoped into the assessment. We are happy to advise further on these issues.</p>
73/ 00529	Dacre, Son & Hartley on behalf of Clays of Addingham	<p>No. This initial SA is extremely generalised and lacks the evidence base and level of assessment required by government guidance.</p> <p>This is a very limited approach and assessment considering the stage reached in the option selection process.</p> <p>We agree with the approach to reviewing Green Belt land releases outlined in the last sentence of paragraph 3.2. We also agree with the first sentence of paragraph 3.4.</p> <p>Reference is made in the short assessment of options 1 and 2 to the effect environmental constraints around Keighley and Ilkley will have in terms of placing pressure on brownfield land within the settlements. This need not be the case if a careful balance is aimed for.</p> <p>We would agree that expansion/development within the principal towns is preferable to the growth points or Esholt or Holmewood (para 3.16)</p>

⁷ Information about concept statements can be found at <http://www.countryside.gov.uk/LAR/Landscape/PP/concept.asp>

74/ 00530	David Blackburn	No. 'Environmental Impacts' major on the natural and landscape environment with the only built environment refers to being Saltaire World Heritage Site. All other built heritage being ignored (e.g. Conservation Areas and Listed Buildings) trade to difficult to accept the number of 'positives'. Comments on consultation exercise not with public.
76/ 00531	Walker Morris on behalf of Mr & Mrs Hopwood	The methodology behind the sustainability appraisal is supported and appears to be in line with the guidance issued on the topic.
		The findings do not highlight a specific spatial option that fully satisfies all areas of concern. This indicates that the chosen spatial option should be based around 'damage limitation'.
77/ 00532	Carter Jonas on behalf of Mr Tony Kemp	At this stage the comments raised in the Initial SA reflect the level of detailed information and analysis already undertaken. The document is necessarily broad but unfortunately does not inform any rational consideration of the options.
78/ 00083	Mrs Christine Dale Ilkley Parish Council	Infrastructure again. Apart from additional housing where would we put additional schools, doctors etc?
79/ 00010	Mr Harvey Bosomworth	No mention at all of Burley or Menston! What about the issues created by Option 4 of apparently merging Burley and Menston (see Plan) with 20% growth? Environmental impact of increased commuting? We need to create housing close to potential employment growth areas.
90/ 00541	Mr John Horton	No
91/ 00542	Mr Andrew Mawson, Bingley Branch Labour Party	Yes. We remain concerned that the funding question is not adequately covered.
92/ 00543	Cllr Kathleen Brown, Ilkley Parish Council Planning Committee	No. Infrastructure – insufficient thought to existing and future needs
93/ 00544	Ms Joan Hyde	Traffic issues as suggested above. We are concerned about development on flood plains. No account seems to have been taken of this. We are concerned at the concentration of employment as suggested in Option 1. Suggestions for Esholt as 3 and 4 would add to traffic problems in present set up.
94/ 00147	Cllr Howard Middleton	No. Green spaces need to be preserved in Urban areas e.g. Brow Wood , BD2. Open Space needs to be provided for all communities.

95/ 00545	Sue Skinner	<ul style="list-style-type: none"> • Although comprehensive the Sustainability Appraisal and other documents do not make any mention of the vital need for collaboration and co-operation between all the various local bodies (government, health, transport, education etc.). • The preservation of the Green Belt and local landscapes is vital for the preservation of the character of all local areas as well as for the well being of residents and the success of future developments. • The provision of recreational areas, allotments and community gardens and local shops and provision for small businesses does not appear to have been stressed sufficiently. • Have local community groups (ethnic Asian and white groupings - see 4.16 above) been involved in consultations? • Housing for the elderly does not appear to have been included in the Appraisal or other documents. • Innovative high-density housing could be sustainably developed in many areas, including mixed housing stock. Has this been considered? • Has the provision of Council funded housing been considered? Are Housing Association and similar providers being involved in the Appraisal process/developments? • Has the provision of multi-use community buildings been considered/appraised? • Has the Appraisal looked at the number/location/potential of Brown Field sites and existing buildings? • There is some contaminated land in the area. Could some of this be used to provide green spaces? • There is no mention of Wild Life Corridors in the Appraisal or any other document. Has the Appraisal looked at existing corridors, their enhancement and the provision new corridors. This could be successfully achieved in tandem with the provision of green spaces, allotments and community gardens. • Has the Appraisal looked at the current/future provision of sports grounds and gardens in local schools and colleges?
98/ 00547	Mr Geoff Best	No. There is a need for more social housing in the Wharfe Valley Area. Many young people who were born and grew up in the area have to leave to find affordable accommodation. There is far too much development of "Executive Style" Housing that is out of reach of people on average earning. This is very profitable for Developers, but take up too much and land does not address the needs of many families.
101/ 00550	Anne Knott	No. The upper worth valley area has seen significant development but no significant infrastructure improvements taking LSC as Haworth, Oakworth and Oxenhope the 2001 census lists 4634 households and 10911 residents all served by 2 inadequate roads, which in parts are country lanes.
105/ 00011	Bradford Centre Regeneration	Yes

106/ 00015	Bradford & Airedale Primary Care Trust	<p>The tPCT is pleased to note that the sustainability appraisal of the LDF Strategic Objectives and to a lesser extent, the Spatial options, includes health parameters. The tPCT requests that it is invited to take an active role in any future sustainability assessments so that the LDF development can draw on Health Impact assessments expertise within the tPCT.</p>
		<p>The tPCT welcomes the commitment to achieving high levels of sustainability, addressing the effects of climate change (including strategic flood risk assessment), reducing waste, maximising the use of renewable energy and sustainable accessible transport options, including improving access to health provision.</p>

6. Core Strategy: Further Issues & Options – Responses to Key Theme – Housing

Housing		
Rep ID	Name / Organisation	Summary of Representation
04/ 00082	Wilfred Shaw Ilkley Design Statement Group	I appreciate that government policy is handed down to you to put into effect, but someone should question the projection of 50,000 houses, so far in the future. What is the basis for this 'new guidance' How new is it? Since the Core Strategy meetings last year we have run into recession – which the Bank of England expect to continue for up to 10 years (2018). If so, we need to Plan B! The economic considerations are: Who will build the 50,000 houses? Who will buy them? <u>Supply</u> Building costs are governed by:
		Supply (1) Land Prices – currently high there is only a finite supply so owners will hold for a long-term gain. (2) Materials – no prospect of reduction in UK production costs as long as manufacturers have to absorb rising energy and transport costs. Imports are cheaper but our balance of payments may deter future imports. (3) Labour – unions will not accept wage cuts. The effect of cheap (Eastern European) labour is already apparent. (4) Productivity – builders are unlikely to invest in new equipment when profit margins become squeezed
		Demand The ability to buy or rent depends upon: (1) Sale of present property – Prices are flat and likely to fall. (2) Buyer Confidence – Dependant upon future employment and earnings and the fear of values falling after purchase. (3) Mortgage Availability- Following the 'Northern rock fiasco, lower percentage and shorter-term loans are offered at comparatively high interest rates. Buyers must find larger deposits, or cash savings. (4) Housing Associations- Dependant on government funding to continue to offer shared equity or subsidised housing.
		The population of Bradford is increasing but will young people stay if there is little prospect of employment here? Recent immigrants from Eastern Europe, may well return (with their money) and we may be unable to maintain Social Security benefits for an increasingly inactive population. Why should householders/ taxpayers subsidize those who "desire" but cannot afford a new house?
03/ 00486	Irene Hudson	I do not approve of anymore housing built in Bingley as we are now swamped with residential housing and no room for shops and businesses. How are services such as Doctors etc going to be cope with this influx of people? The only good thing that comes out of Bingley seems to be the council tax we pay to Bradford to prop it up no more housing please.

Housing		
Rep ID	Name / Organisation	Summary of Representation
35/ 00506	Christine Kay	<p>Where does the government get its idea that we are short of housing? Is there any evidence that this is the case? There seem to be more and more new developments of flats and houses, but there are also many empty properties, old and new.</p> <p>Over the past few years demand for houses has been very high but a lot of this has come from investors wanting to make money on rental properties not necessarily from owner occupiers. Now that the property has started to cool demand has dropped as investors aren't able to make as much money as they once were and are looking for other things to invest their money in.</p> <p>As far as I can tell there is no reason to continue building, especially when the current infrastructure cannot support this. For example the traffic congestion on the Bradford Road near the new High Royds 'village' in Menston</p> <p>New housing developments spoil the landscape and are not necessary. They increase congestion and pollution. They encourage developers to use every scrap of land for building on, which not only reduces the amount of greenery available (wildlife habitat) but is also bad for drainage and encourages flooding.</p> <p>I think that building should be discouraged not encouraged.</p>
82/ 00087	Metro	<p>The concentration of housing development in Ilkley, Keighley and Bradford is probably the most sustainable pattern of development because they are well served by public transport (e.g. Airedale and Wharfedale Lines). Although housing in the LGCs (with the possible exception of Thornton and Queensbury) is also relatively sustainable due to their good public transport links. I would like to see further accessibility analysis of options 3 and 4 before offering a preference as to housing development</p>

Housing		
Rep ID	Name / Organisation	Summary of Representation
86/ 00214	Jo Griffiths, Burley Parish Council	<p>Whilst fully understanding that the need for housing is driven by demands from the National Government and Regional executives; it is felt that work is needed in a number of areas:</p> <p>Numbers - It is conceded that the number of houses that it is anticipated will be required in 20 years time is based on current general trends. We believe that the trends and numbers should be constantly kept under review as both can change drastically in a short space of time. To be locked into a scheme of delivery that is not frequently reviewed and flexible would be nonsensical and commit us to development that might not be justified in the long term. Already, there has been a significant change in the financial climate since the consultation documents were published, which could well mean that a number of assumptions made have already been overtaken by events.</p> <p>Deliverability - The purpose of the exercise is to identify land on which the required number of dwellings can be built. Given that the current build rate in Bradford in the last few buoyant years has been about 1500, it is quite a stretch to imagine how 2700 p/a can be delivered. The plan would have to identify priorities over the order in which sites should be developed. This should ensure that the appropriate infrastructure/investment may be put in place and that sites are not cherry picked to suit developers' short term profits rather than the overall benefit of the area.</p> <p>Design - Steps must be taken to ensure that all new build is of high quality - the mistakes of the 1960s must not be repeated. A rush to build huge numbers of houses is potentially going to lead to shoddy building and merely creating the slums of the future. We should learn from the high density model communities on the continent, which address environmental and sustainability issues. We believe that mistakes are still being made in city centres where large numbers of high rise apartments are being built that do no more than site the residents close to work. They are not creating sustainable rounded communities with shops, doctors etc.</p>

Housing		
Rep ID	Name / Organisation	Summary of Representation
316/ 00769	Boyd Riddlesden	<p>It is incorrect to lead people into thinking that Bradford needs or will need new houses. Bradford does not need any more housing.</p> <p>We do need some decent shops. Already there are lots of unused and empty buildings, which should be utilised better. Many people have left already left Bradford to live elsewhere</p> <p>In relation to recent surveys for housing needs done by Dr Anne Power (LSE), this refers to an agreed survey on housing need in Bradford, basically that there are already too many empty buildings, the population is actually decreasing. It is clear that we do not and will not need to quantity of new houses and properties as mentioned in any of your 4 options.</p>

7. Core Strategy: Further Issues & Options – Responses to Key Theme – Economy & Jobs

Economy & Jobs		
Rep ID	Name / Organisation	Summary of Representation
22/ 00152	Councillor Roger L'Aime	Location of employment must be a prime concern when looking at the distribution of future house building. Reducing the length of journeys to work must in an environmentally concerned age be a key consideration.
26/ 00500	Hartley Planning consultants on behalf of Mr M Booth	<p>Employment Land Supply – Current and Future</p> <p>The Council's Employment Land Review was not available as a public document at the time of writing this submission and is unlikely to be made available before the deadline for submission of comments on the Core Strategy. This is unfortunate.</p>
		<p>The consultation response of Bradford Council's Economic Development Unit on the most recent Tesco applications (07/1023 and 07/1022) does make reference to the recently completed employment land review. The response states that the review recognises the shortage of employment land in Ilkley but also recognises that there is limited demand for major industrial developments such as the Spooners site (the Tesco store application site).</p>
		<p>PPS4 (draft) qualifies that Planning strategies must be underpinned by a robust evidence base to enable local planning authorities to plan effectively and to develop policies which allow for a quick response to changing economic circumstances. We have not been able to review the Employment Land Review and so are not able to challenge the assertions stated in the EDU consultation response. It is understood from the Bradford LDF Team that the review does not go into detail on the demand for employment land and premises in Ilkley and surrounding area. If the evidence base is purely that of the current inquiries information held by the EDU then this is a false position (see below) and is not robust.</p>
		<p>Paucity of Current Land Supply</p> <p>The current Replacement UDP allocates only two employment sites in Ilkley. One site of 1.25 ha (Backstone Way) is now developed out for an existing company and the other of 1.03 ha (Ashlands Road) is constrained and is unlikely to be developed in the short term due to known constraints. New employment sites need to be identified in the short, medium and long term in Ilkley to provide for a sustainable community. The employment land review must be flawed if it is stating that a Principal Town should rely on one small heavily constrained allocated site to meet the business needs of the town and surrounding area up to 2026.</p>

Economy & Jobs		
Rep ID	Name / Organisation	Summary of Representation
		<p>Local Agency Professional View on Employment Land</p> <p>The Head of Agency at Dacre Son & Hartley, Daniel Brumfitt, has provided evidence to Hartley Planning Consultants on the supply and demand of commercial floorspace in Ilkley and the surrounding area. The recent history of commercial land transactions with Dacre Son & Hartley shows a very strong mix of retail, industrial and office demand for Ilkley and this continues to get stronger. Dacre Son & Hartley currently have in excess of 50 named requirements for retail premises and 40 named requirements for office space.</p> <p>Demand is principally generated from local occupiers; approximately 75% of inquiries to Dacres are coming from the local market. Office requirements are from: those local companies that are expanding and seeking larger premises; individuals in private practice in larger city centres, principally Leeds, who are wishing to branch off from a larger practice and set up on their own; companies wishing to relocate their business from Leeds to Ilkley. Most companies are finding that with the advent of information communication systems they no longer need to be located within city centres to be able to successfully conduct their business.</p> <p>With 40 named companies on the books of Dacre Sone & Hartley for office space, here is a true reflection of the current demand for office premises in the Ilkley area. The current paucity of employment land and premises supply is inhibiting the growth of jobs in the Ilkley area.</p> <p>There is a need to both foster indigenous growth and provide for latent demand that exists from those who live in Ilkley but work outside of the area. It is considered that the scale of the latent demand is largely unrecorded because most people will have limited expectations of premises and land supply in the Ilkley area having seen what has gone before and what exists at present.</p> <p>There is real potential in Ilkley to build on the character of the existing local economy (small medium sized enterprises) and explore the option of cluster schemes and attract inward investment in the high value creative, innovative and knowledge based industries. It is acknowledged that the Ilkley will realistically only be providing for smaller scale office developments compared to that of Bradford, the District Centre.</p>

Economy & Jobs		
Rep ID	Name / Organisation	Summary of Representation
		<p>Summary</p> <p>The distribution of employment land growth in the district needs to be fully and effectively considered in the context of the above assessment. There is a need for a balanced and flexible approach to the provision of employment land in Ilkley to serve both the town itself and the surrounding catchment area. The Allocation Development Plan Document must ensure the provision of a new business park for Ilkley and sites will be put forward for allocation as part of the consultation process on that document.</p>
79/ 00010	Mr Harvey Bosomworth	<p>There is very limited provision of employment in the Wharfedale area, and none of the four options proposed would appear to promote any additional employment growth areas in Wharfedale. Thus any housing growth will lead inevitably to additional commuting, and the increasing pressure in transport infrastructure. Surely it makes sense to locate housing development close to employment growth areas, minimising commuting distances and reducing carbon footprints.</p>
82/ 00087	Metro	<p>There is no recognition in any of the options that the centre of Bradford has been identified for significant employment growth. This is the most sustainable location for new jobs as it is the most accessible part of the district by public transport. However, this area is best suited to office related employment growth. Further information would be useful as to what type of employment land the District requires (e.g. how much B2/B8 is required). As we do not support any of the 4 Options in terms of employment growth location we would like to see further work on this area.</p>
316/ 00769	Boyd Riddlesden	<p>We can create jobs with the existing resources, without having to build any more monstrosities.</p>

8. Core Strategy: Further Issues & Options – Responses to Key Theme

Transport & Accessibility		
Rep ID	Name / Organisation	Summary of Representation
22/ 00152	Councillor Roger L'Aime	<ul style="list-style-type: none"> ▪ The transport infrastructure of the Bradford District is unable to cope with present demands. ▪ If there were to be any significant switch to public transport the present bus and rail provision could not meet the increased demand without very substantial levels of investment. ▪ Given that taking into account projects such as Thames Link and Cross Rail the south east is spending £20 Billion on rail alone on a pro-ratio (population) basis Bradford should be looking at a minimum of £800 million plus over a twenty year period. ▪ <u>None of the proposed options are feasible with the present transport system.</u> While not in fact practical, a strong case could be made for a moratorium on any significant development until improvements in both the road system and public transport are in place. ▪ An good example of the mismatch between transport infra structure and development, is the proposed developments in Lower Baildon and Esholt.
79/ 00010	Mr Harvey Bosomworth	<p>The transport infrastructure is already operating at full capacity and beyond at peak times. The rail provision to Wharfedale is a single-track branch line terminating at Ilkley. Lack of capacity due to restrict platform length and train length means that commuters are now driving further and further along the line to find parking and train access, with commuters, for example, driving from Addingham through Ilkley to Burley-in-Wharfedale to park and board the train. There are no high frequency bus services serving Ilkley, Burley, Menston and Wharfedale.</p> <p>The road infrastructure out of Wharfedale is equally congested, with roads such as the A65 into Leeds. The A660 through Otley, the A6038 to Shipley, and the A658 Apperley Bridge being regularly grid locked at peak times. This situation is rapidly deteriorating as new developments in the area, such as at High Royds at Menston, the old Silver Cross site at Guiseley and the various apartment schemes in the area come into full occupation and thus generate additional road traffic.</p>

Transport & Accessibility		
Rep ID	Name / Organisation	Summary of Representation
86/ 00214	Jo Griffiths, Burley Parish Council	Infrastructure - At the consultation in Ilkley on 14 March – many concerns about infrastructure were raised. One of the most worrying comments made by one of the planning officers was that it was not possible to get the other agencies to report specifically until a decision had been made. Surely one of the first areas that should inform this process is establishing in what areas there is unused capacity. For example in the last ten years 700 houses have been built in Burley in Wharfedale and with the exception of placing a porta cabin at one of the schools this significant influx has been absorbed. However, the current infrastructure is now stretched to, and in some cases stretched beyond, capacity. The point we are making is that it should be an imperative to discover if and where the current spare capacity is. The core strategy documents identify communities according to the current infrastructure without reference to whether or not there is any further capacity. For example, Burley in Wharfedale is a 'Transport Hub' because it has a railway station and a main road. The fact that many of the trains are over full and the roads are gridlocked at peak times is not considered. Therefore we would argue that Burley in Wharfedale can not be considered a 'Transport Hub' without the proviso that without significant capital investment or major lifestyle change there is no benefit to be gleaned from this particular 'hub'.
316/ 00769	Boyd Riddlesden	More houses and properties means more drain on the utilities, more traffic (Bradford is already struggling with the excess volume of traffic), and more parking. The Shipley canal basin has already become a car park rather than a route for moving traffic, we don't need any more vehicles. Bradford cannot cope with the sheer volume of traffic we already have.

9. Core Strategy: Further Issues & Options – Responses to Key Theme - Community Facilities

Community Facilities		
Rep ID	Name / Organisation	Summary of Representation
16/ 00092	Atkins Global on behalf of the National Offender Management Service	Circular 3/98 recognises at Paragraph 2 that there should be guidance in development plans on community facilities and infrastructure requirements and also that they should take account of the need for new prison developments, which should be identifies through the planning system.
		While there is no specific proposals for new prison development in your district at present nor specific sites identifies, in line with Government guidance NOMS requests that you consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period.
18/ 00496	John Bretherick, Secretary of Salts Tennis Club	<p>I would like to as a question regarding the plans for supporting infrastructure as part of the consultation, I am referring to:</p> <ul style="list-style-type: none"> - Roads - Schools - Sports & recreation facilities <p>Within the documentation I have received, I have not seen any evidence that these crucial services are being considered as fundamental to the overall plan? In the past 10 years we have seen housing growth in Bradford within little or NO investment in facilities for the people (and especially younger generation) who are to live in these houses.</p>
79/ 00010	Mr Harvey Bosomworth	Education – school provision in Wharfedale is already running at over-capacity. In Burley-in-Wharfedale the primary schools are all over subscribed, as is Ilkley Grammar School.
		Health –again the facilities in Wharfedale are working at full capacity. It is impossible to get dental treatment on the NHS for example without travelling into Airedale for example. Public transport connections to the main Hospital for the area, Airedale Hospital at Steeton in Airedale, are poor.
316/ 00769	Boyd Riddlesden	<p>More houses and buildings will mean less space for play and recreation areas and community facilities. Yet there will be a greater need for them.</p> <p>Lots of land has already been sold off to private (so called) developers and they are not accountable to the people of Bradford. This means that eventually we will have little or no say on the future framework of Bradford.</p>

10. Core Strategy: Further Issues & Options – Responses to Key Theme – Environment

Environment		
Rep ID	Name / Organisation	Summary of Representation
25/ 00113	West Yorkshire Archaeology Advisory Service	<p><i>Comments also under Settlement Study</i></p> <p>The WYAAS has serious concerns with regard to the above documents and believes that they have not adequately taken into account Policy ENV9 on the Historic Environment in the Yorkshire and Humber Plan Regional Spatial Strategy and are therefore fundamentally flawed.</p> <p>The latest version of the Yorkshire and Humber Plan states: "The Region will safeguard and enhance the historic environment, and ensure that historical context informs decisions about development and regeneration" (Policy ENV9 Section A).</p>
27/ 00194	Environment Agency	<p><u>Canal Road Corridor</u></p> <p>A significant proportion of this area lies in Flood Zone 3 (High probability of flooding). We are therefore concerned that it has been highlighted as an area for focused development, including 'more vulnerable' classes such as housing. National flood risk planning policy requires a Sequential Approach to the spatial distribution of development, with the primary aim of avoiding flood risk areas.</p> <p>A Sequential Test should assess whether the development intended for this area can be located elsewhere in the District, at lower flood risk. Any alternative sites must meet the requirements of 'reasonably available', set out in the PPS25 Practice Guide. Only when it can be demonstrated that there are no other 'reasonably available' sites which could accommodate this development, should the Canal Road Corridor be cited in the Core Strategy.</p>

Environment		
Rep ID	Name / Organisation	Summary of Representation
		<p>If indeed this can be demonstrated, there must then be a strong policy response, detailing how flood risk will be proactively managed in this sensitive area, to ensure the wider sustainability benefits outweigh the flood risk. The policy response could include:-</p> <ul style="list-style-type: none"> • The designation of land in the high risk areas as public open space, play areas and other recreational areas, should be considered as a means of making space for flood waters. • 'More vulnerable' developments such as housing should then be encouraged towards Flood Zone 1 and must only be considered in Flood Zones 2 or 3 once the Sequential and Exception tests have been undertaken and passed. Your SFRA should assist you in undertaking the Sequential and Exception Tests, and assessing whether development in these areas is likely to be considered 'safe'. • Where development must go in flood risk areas, vulnerability should be matched to risk i.e. the most vulnerable uses on the lowest risk areas, and vice versa. Your SFRA should inform this process and a policy response should follow. • Where development must go in flood risk areas, it should strive to reduce flood risk overall. The Core Strategy could help to achieve this by requiring the use of Sustainable Drainage Techniques and the reduction of surface water run-off. <p>You must satisfy yourselves that the level of development earmarked for the Canal Road Corridor is feasible within the constraints of flood risk. If it is unlikely to provide the level of development required, alternative development areas should be cited in preference or in addition to this area.</p> <p><u>Ilkley</u></p> <p>The River Wharfe runs through the centre of Ilkley. There have been a number of instances of historical flooding from the river which have impacted on properties and premises close to it. Areas of Flood Zone 3 (High probability of flooding) surround the river corridor. These areas are predominantly undeveloped so allow flood waters to be stored relatively safely on the open-space areas surrounding it.</p>

Environment		
Rep ID	Name / Organisation	Summary of Representation
		<p>We would resist any Spatial Strategy which placed additional development pressure on these high risk areas. There are however, extensive areas of Flood Zone 1 in Ilkley, so provided developments are designed sustainably, it appears that there is the potential to accommodate significant amounts of new development without impinging on flood risk areas. If it is likely that development in flood risk areas will be required, the Sequential and Exception Tests will be required to demonstrate that there are no lower risk sites. Your SFRA should also be used to assess whether development in these flood risk areas is likely to be considered 'safe'.</p> <p>You must satisfy yourselves that the level of development earmarked for Ilkley is feasible within the constraints of flood risk. If it is unlikely to provide the level of development required, alternative development areas should be cited in preference or in addition to this area. A policy response should ensure the avoidance of high risk areas and should ensure that any developments are sustainably designed in respect to surface water management.</p>

Environment		
Rep ID	Name / Organisation	Summary of Representation
		<p><u>Shipley</u></p> <p>Significant areas of Shipley are at high and medium flood risk from Bradford Beck and the River Aire. There have been historical instances of flooding, particularly from the River Aire, which have impacted upon many properties and premises close to the river.</p> <p>Whilst many of these areas are already developed, any intensification of these areas or increase in the vulnerability of development e.g. from commercial to residential, would place people and property under increased risk. You must satisfy yourselves that the level of development earmarked for Shipley is feasible within the constraints of flood risk. If it is unlikely to provide the level of development required, alternative development areas should be cited in preference or in addition to this area.</p> <p>PPS25 requires that the Sequential Test be used to demonstrate that there are no 'reasonably available' lower risk areas which could accommodate the proposed development. This should be undertaken as part of the Core Strategy to inform all your spatial decisions. If the Sequential Test shows that there are no lower risk alternatives to this area, your SFRA should then help you to assess whether development in these flood risk areas is likely to be considered 'safe'. If it is not, the area should not be cited for development in the Core Strategy.</p> <p>We would resist any Spatial Strategy which placed additional development pressure on high risk areas in Shipley. However, there appear to be extensive areas of Flood Zone 1 in Shipley, so it has the potential to accommodate significant amounts of new development without impinging on flood risk areas.</p> <p>A policy response should ensure the avoidance of high risk areas where possible. Where a Sequential Test of the Core Strategy means development must take place in the high risk areas, policy should ensure the vulnerability is matched to risk and that developments are sustainably designed in respect to surface water management.</p>

Environment		
Rep ID	Name / Organisation	Summary of Representation
		<p><u>Addingham</u></p> <p>The vast majority of Addingham is within Flood Zone 1. It should therefore be possible for significant amounts of development to take place without impinging on flood risk areas. However, the River Wharfe lies to the east of the main settlement and is the source of high flood risk on its surrounding land. We will resist any Spatial Strategy or policy which increases development pressure on the high risk areas of Addingham. The Sequential and Exception Tests will be required if the strategy cannot ensure the avoidance of these high risk areas.</p>
		<p><u>Burley in Wharfedale</u></p> <p>The River Wharfe runs to the north east of Burley in Wharfedale. There have been instances of historical flooding from the river which have impacted on some properties and premises close to it. Areas of Flood Zone 3 (High probability of flooding) surround the river corridor. These areas are predominantly undeveloped so allow flood waters to be stored relatively safely on the open-space areas surrounding it.</p> <p>We would resist any Spatial Strategy which placed additional development pressure on these high risk areas. The vast majority of the settlement is in Flood Zone 1 so it appears Burley in Wharfedale has the potential to accommodate significant amounts of new development without impinging on flood risk areas.</p> <p>You must satisfy yourselves that the level of development earmarked for Burley in Wharfedale is feasible within the constraints of flood risk. If it is unlikely to provide the level of development required, alternative development areas should be cited in preference or in addition to this area. A policy response should ensure the avoidance of high risk areas and should ensure that any developments are sustainably designed in respect to surface water management. The Sequential and Exception Tests will be required if the strategy cannot ensure the avoidance of these high risk areas.</p>

Environment		
Rep ID	Name / Organisation	Summary of Representation
		<p><u>Other Settlements</u></p> <p>There are also a number of other settlement cited in the Spatial Strategy which contain some areas of high flood risk. However, in these settlements the constrained nature of Flood Zones 2 and 3, means that it should not have a significant impact on development in these places. Provided the strategy acknowledges the flood risk in these locations and commits to avoiding them, we will not resist the principle of development in the following settlements; Apperley Bridge, Low Moor, Saltaire, Keighley, Bingley, Silsden, Steeton, Eastburn, Menston, Haworth, Oxenhope, Wilsden, Cullingworth. If however, it is thought that development in any of these locations must go in high risk areas, the Sequential and Exception Tests must be undertaken.</p>
		<p><u>Bradford Beck</u></p> <p>Much of Bradford Beck is culverted through the urbanised area of Bradford District. The Environment Agency have a policy which resists culverting for a number of important environmental reasons. Culverts disrupt the natural flooding regime of watercourses by limiting capacity and being prone to blockage. In terms of biodiversity, they have a sterilising effect on both terrestrial and aquatic ecology, as well as fisheries. They are difficult and expensive to access and maintain and often conceal sources of pollution which could otherwise be addressed. If opened up, natural watercourses and their banks have the potential to reduce flood risk,</p>
		<p><u>Foul Drainage</u></p> <p>You must satisfy yourselves that the necessary foul drainage infrastructure is either already available, or is readily deliverable in order to facilitate any new development in the District.</p> <p>We have particular concerns about the proposed Greenfield extension at Holmewood because of known capacity problems at the Tonge A/B pumping station(s). The creation of a new settlement at Esholt will also pose infrastructure challenges in relation to foul drainage provision. Yorkshire Water must be fully involved in any consultation, and the Core Strategy must ensure that development projections do not surpass likely infrastructure provision. In cases where new infrastructure is likely to be needed, the Core Strategy should make clear how the infrastructure will be delivered. This could be through developer contributions or other related strategies.</p>

Environment		
Rep ID	Name / Organisation	Summary of Representation
79/ 00010	Mr Harvey Bosomworth	<p>Wharfedale is regarded as an area of outstanding natural beauty and Ilkley is undoubtedly one of the tourist jewels in Bradford's crown. It contains moorland Special Protection Areas and sits of Ecological and Geological interests. Ilkley Moor, and particularly the Cow and Calf Rocks area, is known throughout the world. With the geography and topography of the area, the limited area between the moors and the river severely restricts the potential for housing growth.</p> <p>I would suggest that taking the above into account, proposals for extensive housing growth in Wharfedale are totally inappropriate.</p>
86/ 00214	Jo Griffiths, Burley Parish Council	<p>Green/Environmental Issues - As a Parish Council we are frequently frustrated that these issues i.e. standards regarding insulation, porous hard standing etc can not be made a condition of planning consent. We believe that these matters should be given urgent and immediate consideration, and that all building that comes out of the LDF should meet the highest possible standards. We also believe that this should be further extended to include carbon neutral building, photovoltaic panels, grey water schemes etc.</p>
316/ 00769	Boyd Riddlesden	<p>We need to maintain and improve high levels of sustainability, not put green belt areas at risk and threaten the environment with more unnecessary building. Bradford needs to clean up and improvement its existing environment, preserving all our trees, wildlife areas and green belt and develop more places for people to enjoy. There is too much obsession with building roads and houses.</p> <p>How can there be any consideration for the environment when there will be much less space left for green belt, nature, wildlife, flora and fauna?</p>

11. Core Strategy: Further Issues & Options – Responses to Key Theme – Waste Management

Waste Management		
Rep ID	Name / Organisation	Summary of Representation
316/ 00769	Boyd Riddlesden	Developing even more houses and properties will only create more sewerage and more pollution.

12. Core Strategy: Further Issues & Options – Responses to Key Theme – Specific Areas

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
06/ 00487	Michael Newman, Baildon Moravian Church	Baildon	I understand the main concern for people in Baildon to be traffic. The numerous developments in the village and along West Lane have caused a lot of extra traffic in Baildon, particularly at peak times. There is effectively only one way out of Baildon, which is down Browgate, and Baildon Road to Otley Road. On most working days the queue for the traffic lights at the junction of Baildon Road and Otley Road reaches right back to the roundabout in the centre of the village, which by my reckoning is a distance of about 1 mile.
			It is therefore felt that until or unless an alternative and suitable route is found which eases the traffic situation, the continuing development of Baildon should be put on hold. From a personal perspective I have wondered about the possibility of a connecting road between Lucy Hall Drive and Bradford Road in Nabwood, which would allow people going to Bradford to travel via Toller Lane rather than Canal Road or Manningham Lane, and people travelling to Bingley and Keighley to avoid the bottlenecks at Shipley and Saltaire. I realise that this route would be controversial, but it seems to be the only option to ease Baildon's traffic woes.
			There is also concern in Baildon about a slow growth onto the moors around Baildon, and we would appreciate reassurances that the moors will be protected from development, as they are an asset not only to Baildon but also to Bradford and the surrounding areas.
09/ 00492	Mr M Thompson	Idle	I have just received your letter regarding where the council is proposing to build new houses. It states one of the sites that they are thinking about is at the rear of my properties in the URBAN GREENSPACE area linking Westfield Lane and Cote Farm. I am most disturbed by the so-called thinking to increase the population within the Thackley area.
			If other houses are built and the council goes back on their word over the green belt land it will DRASTICALLY reduce not only the quality of life both myself and family have but it will also reduce the overall VALUE of my home, knocking 10's of thousands off the current market value, more closer to £60,000.00. This in turn could create a situation where I would be in NEGATIVE equity.
			In the last 3 years I have seen Thackley and Idle both been swamped with new house developments and as such we are losing any natural landscapes in the area and becoming a concrete jungle.

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			Where does it stop? The council decided to take down all of the flats at Windhill, Shipley and have never done anything with the area. Ravenscliffe has hundreds of properties that stand empty. Why not look at these areas, instead of the property hotspot areas. By creating so many properties in the area it will no longer be a desirable area.
10/00491	James Belk	Idle	Just a comment on the possible construction of new homes in the Shipley & Lower Baildon area – The road network cannot accommodate it! Particularly the A657 Shipley to Leeds road, which has become noticeably worse in the 2 1/2 years that I've lived here; at certain times of the day (7-9am and 4-7pm) I will only venture down there in my car if it is an absolute necessity. The particular section of the A657 that's causing problems is the junction with Carr Lane and Crag Rd (B6149), which is itself adjacent to another junction with Thackley Old Road (not traffic light-controlled) that can cause particularly long delays westbound into Shipley. Given the constraints of geography and the already heavy urban development in the area, I don't see how this situation can be improved; it will, however, be exacerbated by any further residential developments.
11/00490	A Walker	Idle	I am in receipt of correspondence regarding the possible proposed further housing development in Westfield Lane, Idle. Despite the fact that this area has already been allocated as urban green space we are now faced with yet more council incompetence in even considering this area for further development. Ignoring the fact that many residents like myself have bought and live in this area due to the easy accessibility of green land space you are now looking to develop in an area which already suffers severe traffic issues. The roads through Thackley, Windhill, Shipley and Saltaire are and have for many years been the subject of planning disputes due to the traffic problems through the Aire Valley. You are now considering further exacerbating this problem with further development. Consider this a definite no to this barmy idea.
12/00489	Shauna & Robert Banks	Idle	Whilst we appreciate the need for more housing to accommodate an ever growing population, we would like to strongly register our objections to any proposals that may involve building on land between Westfield Land and Cote Farm.

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
13/ 00493	Mr M Turner	Idle	<p>In response to your letter of the 30 January 2008, regarding the Council's debate about where houses are to be built in the future, I wish to state:</p> <ol style="list-style-type: none"> 1. The policy regarding greenspace should be maintained as Bradford has too few of these fields left – they are the lungs of the conurbation and do not add to polluted air and global warming. 2. There is a big difference between “Houses” and “Homes” and you say the Government requests 2,700 new “Homes” a year which surely includes apartments, flats, multi- family buildings. The Council should build “Homes” not Houses then much less space is needed. 3. The new “Homes” should be built on brown space sites until every under-used or dis-used industrial site has been developed. <p>I have lived in Bradford for 86 years and seen its fields, trees, moors and hedgerows destroyed for new “Houses”. This country does not have the space for more “development” of that kind. Please try your best to keep the Green space green.</p>
15/ 00495	Shelia Robinson	Idle	<p>I live at Cote Farm Cottages, Thackley and the tenant of the farm has informed us that there are moves to build on the fields. Can you tell me if this is the intention of the Council? If so, can you please tell me the thinking behind refusing planning permission for 3 or 4 houses in front of our homes (which many local people objected to) and the owner of the end house not being allowed the extension he asked for yet we can have thousands of houses built all around us. There are stacks of houses already for sale in the area – why do there need to be more?</p>
19/ 00497	Laura Crawford	Idle	<p>I note from your letter (30th January) that the Governments housing requirements have been provided to each district council, and that the annual number of required dwellings has substantially increased. This clearly puts enormous pressure on the council to satisfy the housing need whilst having due regard to planning guidelines, the current Unitary Development Plan, and local opinion.</p> <p>I can only assume from your letter which makes specific reference to the land between Westfield Lane and the Cote Farm Development, that consideration is being given to potentially re-allocating that land from its current designation as “Urban Greenspace”.</p>

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			<p>The potential reclassification of this site from Urban Greenspace would mean that it is simply a matter of time before further development took place. This would be a travesty for the local population for the following reasons:</p>
			<p>Loss of Amenity Land</p> <p>The area between Westfield Lane, High Busy Lane and Leeds Road is not simply an area of open green space. Due to its elevated position Westfield Lane affords spectacular views across the valley and as a result is a regular destination for dog walkers and ramblers alike. The footpaths down Crooked Lane and down the side of Laverack Hall Farm are regularly used by the general public who welcome the availability of such rural surroundings in a relatively urban area. The current Urban Greenspace has high landscape value and any extension of the development footprint would have a serious visual impact upon the rural nature of the surrounding land.</p>
			<p>Wildlife/Biodiversity</p> <p>The Urban Greenspace forms a natural environmental corridor to the agricultural land beyond High Busy Lane. The area is frequented by deer, bats and foxes and the further urbanisation of the site can only have a negative impact on resident wildlife.</p>
			<p>Highways Safety</p> <p>Serious highways issues would be created by any further development on this site. Westfield Lane is already unsuitable for large vehicles due to its blind corners and, in certain sections, single carriageway.</p> <p>As a result of the increased development in and around Idle, Westfield Lane carries far more traffic than was ever intended which has resulted in the need for traffic calming measures in the form of speed bumps. Further development can only place more strain on already overburdened roads.</p>
			<p>Local Infrastructure</p> <p>Over the last few years there has been sustained development in and around Idle, including the Cote Farm Development, housing developments off Westfield Lane and the substantial "Pavillion Gardens". All of these developments put increased pressure on the local infrastructure, including schools, highways and local support services such as doctors and dentists.</p>

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			<p>Brownfield Sites</p> <p>Whilst it is accepted that there is a need for housing and the government's requirement for additional housing provision must be met, emphasis should be placed on utilising brownfield sites.</p>
30/ 00502	Mrs Suzanne F. Atkinson	Idle	<p>Westfield Lane is already a 'rat run' on a morning and at teatime. Bearing in mind the narrowness of the Lane that runs over the moor top towards the Wrose end of Westfield Lane and the narrowness of the road that runs behind the White Bear through the listed cottages, I think any consideration of increasing the traffic numbers is ludicrous.</p>
			<p>One field being built on is not going to sort out the housing problems in Bradford, bearing in mind all the land available elsewhere, but it would create dreadful problems for the residents of Westfield Lane.</p>
31/ 00503	Mr H. Flesher	Apperley Bridge	<p>I have been informed (Letter form BMDC dated 27 February 2008) that consideration was to be given to the commencement of house building on the 13.4 hectares of land surrounded by Simpson Grove, Leamington Drive and Apperley Road from the year 2016.</p>
			<p>What can the Planners be thinking about?</p> <p>As a consequence of the almost uncontrollable amount of housing recently sanctioned e.g. Cote Farm, every available plot of land in the village of Idle, and land to the South East of Apperley Road, local resources are stretched to breaking point.</p>
			<p>The roads are totally overstretched. Leeds Road has become almost a 'No go' area at times from Thackley to Greengates. Access is almost impossible at times from Apperley Road and Simpson Grove. aiming bumps have not helped traffic using Apperley Road due to the bottleneck at the canal bridge, and the serious congestion at the Leeds Road junction.</p>
			<p>Surely, further development in this immediate area should not be given consideration, as local amenities such as Schools, Doctors and Dentists will be unable to cope.</p>

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
32/ 00504	Elieen White	Idle	Enough is enough, especially as all this building is going on top of land extensively mined and quarried. In any case, the Council can't even provide necessary services for all this building; there is no bus service going up Westfield Lane to Wrose.. What is happening to curb excessive car use? It has only been encouraged so far. An where are the shops to service the houses? It's a mile to the supermarkets, which only encourages yet more car journeys, and disadvantages non-car owners. And as farmland disappears under housing, is the country to import its food? And where do all these new residents work? - Apart from serving in the yet more chain stores being build in Bradford. That land could have been used for housing, as could any land designated for more super markets and accompanying car parks.
33/ 00461	Mrs Joanne Besford & Mr Tony Zackarczuk	Idle	Westfield Lane, Idle Whilst we appreciate the growing need for new housing and facilities we would strongly object to development of the mentioned sites. This land is of key importance to the neighbourhood and vital in retaining the historic character and charm of Idle Moor.
56/ 00517	S Drye	Idle	I wholly object to any such development in my local area, particularly on urban greenspace such as Idle Moor. Not only is this a conservation area with open green space and wildlife, access to the area is over congested with traffic issues to the point where it is fast being dangerous to both drivers and pedestrians to use. I am concerned the threat to wildlife any such development will have as this area is home to many different types.
69/ 00526	David Herdson	Baildon	We believe no part of Baildon should have been included in the central core zone and would request its removal. Unlike Bradford and Shipley, it does not enjoy good public transport links and is unlikely to do so in the near future. In addition, the single crossing point of the River Aire, at Baildon bridge, acts as a choke point for all traffic travelling between Baildon and Shipley – or points beyond in either direction. That is unique to Baildon within the core zone; all other areas of it are south of the River Aire. Baildon has already experienced considerable development in recent years, and while it is not alone in that, as I have already noted, it does not have the transport infrastructure to cope with the existing population's requirements, never mind more. On a normal weekday, traffic jams of over a mile occur from the junction of Baildon Bridge from Baildon has to travel. Additional development, whether in Lower Baildon or higher up will add to this problem.

Specific Areas							
Rep ID	Name / Organisation	Area	Summary of Representation				
			<p>We believe that until additional transport capacity is added, NO allocation should be made to Baildon or that part of Esholt accessed from Baildon Road/Hollins Hill. We appreciate that there is a requirement to schedule some 50,000 new properties across the district over the next 18 years, but we would request that Baildon's share of that be kept to a minimum, and be deferred within that until at least a point when the Shipley Eastern Bypass will have been built – which will deal with many of the problems at Baildon Bridge and Fox Corner. We would also reiterate the point about keeping Baildon as a separate entity within the plan and not incorporating it with the urban centre.</p>				
			<p>I have included summary sheets of all petitioners, as the petition was conducted by post. Please do not read anything into the absence of names from the West Lane area – the feeling in that part of Baildon is as strong as elsewhere, but due to time constraints, reply forms were not delivered to residents there.</p>				
			<table border="1"> <tbody> <tr> <td>Robert Walton Pauline Walton R W Pedley C Pedley G Pedley S D Pedley Sheila Edwards V Beckley S Beckley Carol Driver Graham Driver Norma Brickley Valerie Brickley Alison Shaw Ernest Shaw Norma Shaw Peter Norfolk Mrs K J Norfolk D Ingham S W Ingham</td> <td>Mrs H M Hague Michelle Gledhill Lisa Edwards Edward Gledhill Lorraine Gledhill Mrs R E Truelove J Binns A K Styles B Styles Mr A Sharman Mrs D Sharman Christine Moon Harry Moon Mary Cresswell Rob Higgle Susan Shaw Denis Shaw Michael Tuner Caroline Turner Jeffrey Mottershead</td> <td>Joy Mottershead Elizabeth Bottomley Janette Bloor Peter Sorge Valerie Sorge K Dickerson M Dickerson George Cougan Barbara Cougan Ann Maynard Colin Maynard M B Jefferies Barbara Haley Peter Haley E Kinsella E G Kinsella Eileen Earl Kenneth Earl Mrs I Campbell Mrs C Campbell</td> <td>Elaine Stott Trevor Morton Margaret Morton John Parker Andrea Parker George Everall Gillian Everall P R Sanderson T Sanderson M Robinson P Robinson Diana Gill Carole Parker Joan Elks Richard Hoddy Caren Hoddy Carla Kennedy Janet Kennedy Michael Kennedy Daphne Brimacombe</td> </tr> </tbody> </table>	Robert Walton Pauline Walton R W Pedley C Pedley G Pedley S D Pedley Sheila Edwards V Beckley S Beckley Carol Driver Graham Driver Norma Brickley Valerie Brickley Alison Shaw Ernest Shaw Norma Shaw Peter Norfolk Mrs K J Norfolk D Ingham S W Ingham	Mrs H M Hague Michelle Gledhill Lisa Edwards Edward Gledhill Lorraine Gledhill Mrs R E Truelove J Binns A K Styles B Styles Mr A Sharman Mrs D Sharman Christine Moon Harry Moon Mary Cresswell Rob Higgle Susan Shaw Denis Shaw Michael Tuner Caroline Turner Jeffrey Mottershead	Joy Mottershead Elizabeth Bottomley Janette Bloor Peter Sorge Valerie Sorge K Dickerson M Dickerson George Cougan Barbara Cougan Ann Maynard Colin Maynard M B Jefferies Barbara Haley Peter Haley E Kinsella E G Kinsella Eileen Earl Kenneth Earl Mrs I Campbell Mrs C Campbell	Elaine Stott Trevor Morton Margaret Morton John Parker Andrea Parker George Everall Gillian Everall P R Sanderson T Sanderson M Robinson P Robinson Diana Gill Carole Parker Joan Elks Richard Hoddy Caren Hoddy Carla Kennedy Janet Kennedy Michael Kennedy Daphne Brimacombe
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Specific Areas						
Rep ID	Name / Organisation	Area	Summary of Representation			
			Marjorie Legg Dr Gerald Dobbs Charlotte Dobbs Jean Feather Keith Renshaw Annie Braithwaite Charles Braithwaite Ken Raistrick Theresa Raistrick Pat Renton Adrian Hill Arthur Bentley Joan Bentley John Jennings Patricia Jennings Rosalie King Pamela Poole M M Hyde William Slessor Mollie Thornton Keith Thornton Constance Pilkington Sally Dyer Robinson Halliday Margaret Halliday Mr D Ferry Paula Cripps Brian Cripps P Sheffield I M Sheffield Christine Pollard Allan Giles Pauline Giles Richard Carter Joan Carter Andrew Westman Diane Westman Michael Bottomley Margaret Bottomley	Jean Sands Shahbaz Munir Simkey Munir Joyce Hardy Caroline Bailey Michael Bailey Brian Bailey Maureen Bailey Anita Bailey David Baley Mrs M Sunderland Jennifer Woolley Raymond Woolley Rita Newsham Jean Davis Ethel Empsall David Wilkinson Mrs B F Stevens Yvette Harland Olive Harland David Airey Miriam Airey Barry Bower Jennifer Bower Roman Luczyn Katerina Luczyn Paul Brumfitt Michael Thornley Susan Thornley Michael Rich Edwina Rich Mrs L Coverdale Mr R Coverdale Miss A Coverdale James Paul Eric Dinsdale Una Harris Kenneth Harris William Roberts Mr A G Thornton	Anthony Halliday David Halliday Patricia Halliday Godfrey Hudson Michael Seery Don Morris Leopold Balaram Shirley Balaram Victoria Aird David Aird Jonathan Aird Dorothy Iles Alice Reynard Maurice Reynard Christian Johnson Karen Johnson Robert Hague Suzanne Hague Audrey Ronkowski Frederick Strauss Margaret Strauss Betty Briggs R Craven Christine Rumbold Clive Rumbold Joan Grimes Barbara May Charles May Donald Hudson Jacqueline Gott Keith Thornton Pauline Thornton Norman Potter Jennie Bailey Dorothy Edge Sally Binns William Clark Elizabeth Shaw Jennifer Evans	Melvyn Stephens Sandra Stephens Paul Stephens Dorothy Holdsworth James Spencer Pauline Spencer Ruth Wood John Wood Brian Lawrence Linda Lawrence R Lawrence Tony Bloor Carol Bloor Jessica Bloor Barry Vasquez Lynne Vasquez Marion Seymour Florence Sanderson Mrs E Wiggins Mrs S Wiggins Miss H Wiggins Miss G Greengrass Ethel Bullen Joanne Ibbitson Tyrone Ibbitson Irene Thackray Barbara Collingwood Ronald Collingwood Anne Adie Esther Beatty Margaret Lawson William Lawson James Woodhead Joyce Woodhead Megan Hope Peter Hope Betty Hart Moira Beveridge

Specific Areas						
Rep ID	Name / Organisation	Area	Summary of Representation			
			Ron Bell Alan Annakin Joan Annakin John Cooley Sandra Cooley Owen Williams Nancy Emmott Jean Woodward Nellie Creek Jayne Harrison Gordon Tinsley John Harrison Diana Harrison Gwenda Bloor Russell Bloor Margaret Yewdall Geoffrey Hall Margaret Hall June Catterall	Michael Mahoney Pauline Mahoney June James Barbara Pool Colin Pool David Fawcett Colin Bennett Dorothy Bennett Lilian Stross Harry Baldwin Violet Baldwin Sylvia Hendry Alan Plowright Geoff Nunn Matthew Nunn Anne Nunn Janet Saunders James Nelson	Linda Nelson Christine Ward Anthony Ward Daphne Smith Susan Heath David Heath A Mathering Muriel Bridge Abigail Leyland Matthew Leyland Florence Grundy Diane Turner David Sellers Carol Sellers Anne Bekker Lisa Brassington	Anthony Pike Arthur Chester Eileen Chester Barry Town Margaret Town Robert Bentley Ronald Jowett Wendy Jowett Jacqueline Walker Paul Walker Alan Spandler Glenda Spandler Audrey Malloy William Malloy Jane Howard GR Kay George Land Jean Land
86/ 00214	Jo Griffiths, Burley Parish Council	Burley in Wharfedale	<p>Moving from the general points to the specific points relating to Burley in Wharfedale. In the core strategy Burley in Wharfedale is identified as a Local Service Centre. Whilst accepting that the village has some of the attributes identified in assessing sustainability of a community i.e. doctor's surgery, primary school, proximity to a railway station etc. the village is in many respects at capacity in these areas. As stated previously, in a little over 10 years the number of dwellings in Burley has increased by one third – approximately 700 new properties. Very little capital investment has been made to address this increase in population other than extending the library's opening and providing a temporary classroom at one of the primary schools.</p> <p>There are already new developments underway in the village, either about to start or under discussion with developers at sites including Burley Grange, The Lawn and Greenholme Mills. These all place additional pressure on the village's infrastructure.</p>			

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			<p>Transport Issues:</p> <ul style="list-style-type: none"> • At peak times, all the Leeds trains are at their capacity. Without long term and large scale capital investment this is unlikely to improve. • Access roads to both Leeds and Bradford are very congested – not just at peak times. The A65 is already very busy and is set to become more so when the planned building works in Leeds (at Rawdon, Guiseley and Menston) and in Bradford (at sites in Menston) are completed. There are significant bottlenecks at Shipley and on the A660 into Leeds via Headingley. • The documents themselves concede that there are insufficient buses of a frequent nature to allow this to be counted as a practical and reliable means of transport.

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			<p>Education:</p> <ul style="list-style-type: none"> • There are two primary schools in the village. Both are full beyond their official admission numbers. The two schools should have 525 children but they currently have 549. Over the last 7 years BMDC have consistently underestimated the number of school places required in Burley. The schools have monitored the number of children registered at the Doctors Surgery and the indications are that even without further building the numbers are unlikely to decline in the foreseeable future. Further capital investment will be required if either of the schools is able to expand. • The only secondary school for children in Burley is Ilkley Grammar School – this is also at capacity. There is enormous pressure on places and despite the relative size of Ilkley to Burley over one third of the last intake into Year 7 was made up of children resident in Burley. In recent years children from local schools e.g. Menston and this year Addingham, have been unable to get places at the school. Ilkley Grammar School is a very large school that completely fills its site. There have been a number of opportunities over the last 10 years for this to be addressed but they have been lost. • Children living in Menston (despite living in Bradford) rarely manage to get a secondary place in a Bradford school and go to a Leeds secondary school – it should be noted that given the building in Guiseley and Menston the pressure on the Leeds schools by Leeds residents is set to increase. Where does that leave the children in Menston? By implication the knock on effect if there is major building in Ilkley is that there will be a reduction of the catchment area for Ilkley Grammar School. It is very easy to envisage a scenario where children living in Addingham, Menston and Burley struggle to find secondary school places in the valley at all. <p>Health</p> <ul style="list-style-type: none"> • Access to the local hospitals particularly Airedale, is very difficult by public transport. • The local doctors' surgery is looking to expand to accommodate the existing population.

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			<p>Employment</p> <ul style="list-style-type: none"> • There are limited employment opportunities in the Wharfe Valley and very little suggestion of significant increase in employment. • Many of the local former sites of employment have been transformed into residential sites. • The potential employment growth areas identified by the Core Strategy are a considerable distance from Burley and employees would have a long and potentially difficult commute. • The strategic objectives of the core strategy include the need “to promote development in sustainable locations that reduces the need to travel and minimise the need to travel by car” (Further Issues and Options for Consultation – Spatial Vision and Strategy 3.4) • Planning Policy Statement 1: Delivering Sustainable Development states that “... everyone has the opportunity of a decent home, in locations that reduce the need to travel” (Further Issues and Options for Consultation – Settlement Study 4.2) <p>Affordable Housing</p> <ul style="list-style-type: none"> • As identified in the Housing Needs Survey of 2005, Burley has a lack of affordable housing to support local residents particularly the young and the elderly. Any additional housing for Burley should be affordable. • By providing smaller, affordable housing units for older residents, larger properties more suitable for families would be made available. <p>Green Belt</p> <ul style="list-style-type: none"> • Referring to an earlier point – we feel that it is imperative that if Green Belt sites are identified, they are not released ahead of non-Green Belt sites to satisfy cherry-picking developers. • That Green Belt sites are only released following evidenced proof of need- i.e. not just based on ‘general trends’. • Burley Parish Council is anxious to ensure that the Green Belt south of the railway line is preserved in tact.

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			<p>The Parish Council considers that what happens in other parts of the Wharfe Valley is equally important to Burley. Increased building in Ilkley, Menston, Burley or Addingham has a direct impact on the services shared by all the residents of the Wharfe Valley e.g. schools, health services and transport. The Parish Council would urge officers to consider the impact the expansion of any settlements along the Wharfe Valley will have on the whole area. There are already two large scale housing developments planned for Menston and the three aforementioned sites in Burley will place additional pressures on an already over-stretched infrastructure. The Wharfe Valley is operating at full capacity now and no more building should be considered for this area without first addressing the not insignificant infra-structure issues as outlined.</p>
89/00540	David Machin	Menston	<p>Having missed the meeting called for last Saturday (was it widely publicised to Menston residents?), I have had sight of your 'Core Strategy Further Issues and Options for Consultation ' document. I should like to make the following helpful suggestions:</p> <p>b. With a great many words on housing, and almost none on roads and schools (except to pay lip service in general terms), I wonder whether you should not deal with infrastructure and facilities for people as an equally important part of your planning. Merely to supply houses is simple not tackling the problem you have.</p> <p>c. Living in Menston, and therefore having a particular interest in this part of the district, I see three reasons for the most minimal inclusion of additional housing in the Menston area of Bradford Metropolitan District</p> <p>1. We already have a massive programme of new housing, which will place enormous strains on the village infrastructure, putting at risk our nature as a village. Even more housing will damage irretrievably the very reasons for people wishing to live here, and the enjoyment people have who do.</p> <p>2. The A65 road is already overfull, and will become hopelessly inadequate once approx 2000 extra vehicles from the already agreed new developments coming on stream. Without coherent planning on your part, it would be irresponsible to put even more traffic onto this road by building still more housing.</p>

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			<p>3. At present, Bradford is unable to provide any secondary school places for it's Council tax payers' children in its nearest secondary comprehensive school at Ilkley. If it continues to ignore its responsibility in this area, it should perhaps propose a boundary change, with Menston handed over to Leeds, which does seem prepared to educate its children. Alternatively it should include the provision of a new high school in this area as a major part of its core strategy.</p>
90/00541	Mr John Horton	Burley-In-Wharfedale	<p>Thank your for allowing me to comment on the LDF. I have lived in Burley –in-Wharfedale for over 70 years and have witnessed a lot of changes to the village. I have seen its population more than double since the war with more and more housing but also with an ever-decreasing infrastructure that is now approaching crisis. The LDF now threatens us with at least another 140 houses.</p> <p>Burley-in-Wharfedale cannot cope with any increase in population because its public services and facilities are inadequate.</p> <ul style="list-style-type: none"> • Bank: None, except Post Office. • Education: Our two primary schools are at capacity. We have no secondary school and the one at Ilkley is also at capacity. We have very little adult education. • Employment: Very little and no factories, etc in the village. • Health: Doctor's surgery at capacity and seeking more space. No hospital. Nearest hospital is at Otley (Leeds) and ahs a limited service. Three others are distant and require public transport changes to get there. • Public Buildings: Much reduced and not enough available for further education and meetings, etc. • Public Safety: No police, fire or ambulance station. • Public Transport: Trains at capacity during rush hours with not enough car parking near station. No bus service to Bradford, Harrogate or Leeds via Guiseley. • Private Transport: Not enough car parking in village centre. Only three small garages for car maintenance and one filling station. • Shops: Very few for present size of village. • Sports: No changing rooms or lavatories in public recreation ground.

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
			I hope my comments on our inadequate infrastructure will be considered re, our problem with yet more housing and that our precious 'green-belt' can be saved for possible future food production as it was in the war.
92/00543	Cllr Kathleen Brown, Ilkley Parish Council Planning Committee	Ilkley	<p><u>Transport</u></p> <p>Ilkley is designated as a Principal Town on the basis that it is well served by public transport. In reality this has limitation. There are no direct bus routes to Bradford. Train usage is at such a level that the trains are over full at peak times. We do not believe there are currently any plans to increase the number of carriages with knock on effect of needing longer platforms etc. Parking within Ilkley is insufficient for more commuters. (The A65 is very congested at peak times and weekends at both ends of the town and is reaching gridlock in Menston).</p> <p><u>Education</u></p> <p>Schools in Ilkley are currently full and oversubscribed with Ilkley Grammar School operating over capacity on a very constrained site. Already they are unable to keep all pupils in at lunch time. This year some Addingham children have been denied admissions. Any increase in pupil numbers would lead to Ilkley children being offered places out of town. This is unsustainable as well as unacceptable.</p> <p><u>Environment</u></p> <p>Ilkley's setting within the moors and the river means there is in reality little land that could be used. The green belt to the north of the river is either in the flood plain or adjacent to the Nidderdale AONB. A recent Inspectors Report stated that any development on the former Middleton Hospital site would be unsustainable as car journeys would be involved. This would be the same for much of Ilkley Green Belt which we would not wish to see used for development as it would lead to coalescing of communities along the A65. Within Ilkley many areas have little open space so the surrounding open areas are vitally important.</p> <p><u>Employment</u></p> <p>With little allocated employment land in Ilkley there are few opportunities to increase greatly the numbers who could be employed within the town. Already large numbers of residents commute to Leeds and more development would lead to Ilkley becoming a dormitory town for Leeds.</p>

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
99/ 00548	Mrs Audrey Hall	Apperley Bridge	<p>Re: Development of land alongside Simpson Grove, Leamington Drive, Apperley Road, the Canal etc in Idle</p> <p>The building going on in the area is already adding to the weight of traffic. To build in the proposed fields will make Hemmingway Road even busier. It is a difficult road already with excess traffic from the development at Tenterfields making for difficulties. Trying to get into the very busy Leeds Road or crossing the canal bridge will be horrendous. Whilst on this subject pedestrians trying to cross the top of Hemmingway Road towards Thackley have a completely blind view of traffic coming up Hemmingway Road whilst people going towards Greengates cannot see the traffic coming along Leeds Road and signalling turning left for the bus shelter and large electrical boxes. We take our life in our hands every time we try to cross. What will it be like when there is more traffic using Hemmingway Road?</p> <p>The eroding of the Greenbelt land is criminal. Greenbelts were set up as a measure for protecting our countryside. It seems that this situation is fine until the Council decides to raise more money by selling it off. This may sound like a NIMBI protest but this proposed building has much wider implications than that.</p>
100/ 00549	Shelia Studdards	Wagtail Close, (Westwood Park) BD6	<p>It is apparent that there is a shortage of properties like we have at Wagtail. There needs to be more units similar to the "Cluster " buildings, which incorporate individual flats with communal areas for staff support. These need to for permanent tenants.</p> <p>At the same time it is felt that the Service to the younger disabled adults needs some sort of facility like the respite unit at Wagtail for use with the transition from "young adults living at home" to "moving into the community independently".</p> <p>This would also benefit other people with long term illnesses who may need re-habilitation following strokes, or relapses and needing assessment for their future.</p>

Specific Areas			
Rep ID	Name / Organisation	Area	Summary of Representation
261/00707	Dr James Nelson	Baildon	<p>I have recently received a letter from yourself/Bradford Council regarding housing/planning in the Bradford area particularly with reference to Baildon I am sure my concerns are mirrored by many people in this area and also nationwide with respect to their own areas. This was in response to a petition I signed regarding housing development in the Baildon area. My concerns have also been amplified by some, admittedly relatively small developments in the other areas of Bradford where local protest has been by-passed, and the common sense and general competency of Bradford's planning committee is questionable. However, the latter are not helped by this governments housing policy and the fact they will fine councils if a given number of houses/dwellings are not produced. It ends up creating a mockery of the whole planning process and no wonder perhaps if councils are in as strangle-hold- damned if they do, damned if they don't!</p> <p>Baildon has taken on a huge amount of housing in recent years- flat developments at Kassapians (Baildon Rd), on Otley Road housing and flat developments either completed or in the process of and housing on West Lane on the site of the old reservoir which is taking on over 120 houses! Did it have to be so many!? In all cases the added congestion will be horrendous and will add to the already choked up roads in the mornings. I believe residents in the West Lane area are up in arms over this. Will anything be done to improve and incentives public transport- likely not! I am sure residents in other areas of Bradford, including Eldwick which has been heavily developed, have similar grievances! People up and down the country probably feel the same way at how local areas are been ruined, good houses been pulled down to build more houses/flats on the same land (often for the 'greed' of the original landowner), green belt land being eroded.</p> <p>When will councils, planners and government listen to people- we have no faith!</p>

13. Core Strategy: Further Issues & Options – Responses to Key Theme – GENERAL

Rep ID	Name / Organisation	Issue	Summary of Representation
20/00498	Norman Scarth	Population figures	I am horrified by the first paragraph of your leaflet 'YOUR DISTRICT IN 2026' which tells us that the population of Bradford District will grow by 109,700 in the next 21 years. My horror is not so much by the statement itself, but the fact that you accept without comment the great danger facing not only Bradford, but Britain & the whole, world. <u>ALL</u> our problems - present & future – congestion, pollution, global warming, water shortages, food shortages, excessive immigration, etc. are, & will be exacerbated by the POPULATION EXPLOSION of Human Beings. Your idea that we build ourselves out of trouble is like the Captain of the Titanic saying we must build more accommodation for the extra passengers who will be coming aboard.
22/00152	Councillor Roger L'Aime	Language	<ul style="list-style-type: none"> A lay reader might find the use of jargon a little off putting.
		Figures	<ul style="list-style-type: none"> There is no detailed analysis of why the suggested degree of development is needed. The Leeds City Region Strategy talks about 50,000 plus new houses in the Bradford District is this based on theoretical need or likely desire and ability to purchase? Some increase in the rate of house building is necessary as the present rate requires an average life span of around 160yrs for a house just to maintain the current number of dwellings. Past and future population increase dictates that either much high densities of development must be accepted or some use of current green belt land must be made.
		Saltaire WHS	<ul style="list-style-type: none"> Several options raise the issue of their impact on the Saltaire as a World Heritage Site. If the economic impact of retaining Saltaire as a World Heritage Site is less than the value of the more general development of the Shipley/Keighley corridor then its' World Heritage Status should be allowed to lapse.
		Decision making	<ul style="list-style-type: none"> Decisions on future development in of Bradford should primarily be taken by Bradford's elected members not regional quangos.

Rep ID	Name / Organisation	Issue	Summary of Representation
58/ 00519	Andy Macdonald Schools Organisation & Capital Strategy - BMDC	Poplars Farm Primary School	<p>Proposal:</p> <ul style="list-style-type: none"> ▪ Provision of 2 new classrooms ▪ The location of the block is the tarmac area to the west of the school. This does present access difficulties (for construction) as does all the site. <p>Constraints:</p> <ul style="list-style-type: none"> ▪ Open fields at the end of Poplars farm Road are owned by Bradford Council and are designated Housing Site under the RUDP.
59/ 00088	Spawforths on behalf of Miller Strategic Land	Evidence base	<p>Miller Strategic Land are concerned that this consultation has been prepared with little regard to an evidence base. PPS12 sets out the tests of soundness that are to be considered in the preparation and examination of a Development Plan Document. Test vii requires plans and strategies to be founded upon a robust and credible evidence base. It is noteworthy, that one of the reasons that the Lichfield Core Strategy was found to be on unsound on was its weak evidence base.</p> <p>As such the Issues and Options paper must be based upon a robust and credible evidence base. It seems illogical to devise strategic scenarios and options on the way forward for Bradford without the Urban Potential Study being completed. Without taking all available documents into account and having an up to date robust evidence base at an early stage the devised Core Strategy will be weak and could potentially lead to the Core Strategy being deemed unsound</p> <p>We consider the timing of this consultation to be premature to the emerging Regional Spatial Strategy. The Government Office is scheduled to adopt the Regional Spatial Strategy in May 2008 and preparation of the Core Strategy Issues and Options needs to dovetail with this, as this will determine many of the spatial and growth requirements for Bradford for the next 15 to 20 years. Producing an Issues and Options paper that fails to conform with the emerging RSS will generate a set of false Issues and Options that will raise procedural issues under PPS12 soundness tests iv and vii. For instance, it is concerning that some of the scenarios do not properly reflect Policy YH8 of the emerging RSS.</p>

Rep ID	Name / Organisation	Issue	Summary of Representation
64/00523	Dacre, Son & Hartley on behalf of Taylor Wimpey UK Ltd	Annual Housing Provision 2008 - 2026	<p>Despite the considerable increase in annual housing provision that the District faces (2,740 gross annual provision in RSS Proposed Changes), and the concern that the step change will be difficult to deliver and achieve, we support the increased housing provision outlined in the RSS and incorporated into the LDF core Strategy. The increase reflects the available evidence relating to forecast economic growth in Bradford and the more recent household formation forecasts as explained below.</p> <p>Evidence Base</p> <p>We consider it necessary at an early stage in our response to raise the PPS12 nine tests of 'soundness' in respect of the Bradford Core Strategy Further Issues and Options documents, as this is of considerable importance:-</p> <ul style="list-style-type: none"> • Evidence base that underpins the LDF Core Strategy; • Conformity with current saved Replacement UDP and PPS3 policy; • Conformity with emerging policy (Draft RSS – Proposed Changes September 2007); and • Choice of consultation options and their relationship with the adopted development plan. <p>In preparing our response, we had regard to a number of key documents including:-</p> <ul style="list-style-type: none"> • The Planning Inspectorate – Local Development Frameworks: Lessons learnt examining Development Plan Documents (June 2007) • The DCLG 'Preparing Core Strategies' advice report (December 2006). • The 'Leeds City Region Development Programme' endorsed by the eleven Leeds City Region local authorities (November 2006); • PPS3 Housing (November 2006); and • The Planning Inspectorate – Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents <p>Paragraph 4.24 of PPS12, explaining the 9 Tests of Soundness:</p>

Rep ID	Name / Organisation	Issue	Summary of Representation
			<p>With the above in mind, an overriding concern with the Core Strategy consultation documents is the lack of a robust evidence base. Paragraph 1.12 of the Planning Inspectorate Lessons Learnt Examining Development Plan Documents (June 2007) states that “Given that the options should also be informed by evidence, we would expect the evidence base to be substantially completed at preferred options stage.” Whilst this consultation exercise is a ‘Further issues and options’ consultation, it is essential to have had a large degree of evidence base at this stage in order to provide a meaningful and fully considered response.</p> <p>The expected step change in the delivery of housing in the Bradford district from 2008 onwards (2740 per annum in RSS Proposed Changes) requires the Council and other key stakeholders to work closely together and collectively demonstrate at these early stages those development areas that can deliver sustainable development. Therefore, at the very least, the basics of a SHLAA and SFRA should have been made available to Consultees who could then assess that information to formulate a view on whether or not the Strategic Vision can be delivered.</p> <p>Paragraph 3.5 of the Core Strategy Settlement Study lists a number of supporting documents, stating which have, or are currently being produced. It states that an Urban Potential Study is to be completed in Spring 2008. This is itself an important document, which should ideally have been complete when the issues and options for the spatial vision and strategy were being developed.</p> <p>There is very limited evidence available to clearly and fully support any of the four options contained within the Core Strategy Spatial Vision and Strategy. Without this evidence base the responses to the Spatial Vision and Strategy can only be of a preliminary nature and a further opportunity for comment should be provided when that information becomes available. We consider the current situation to be contrary to PPG12 Soundness Test vii, which states that “The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.”</p> <p>The Settlement Study also refers to an Employment Land Review, stating that this was completed in December 2007. This document is however not available in the public domain and is not due to be published until the end of March 2008, which is after the end of the further issues and options consultation period. The quantity of available employment land is also important in producing viable and achievable options for the spatial strategy within the Core Strategy. Given the identified conflicts / restrictions between finding sufficient employment and housing land in certain options, we regard this missing document to be an important part of the evidence base.</p>

Rep ID	Name / Organisation	Issue	Summary of Representation
73/ 00529	Dacre, Son & Hartley on behalf of Clays of Addingham	Evidence Base	<p>We have a significant concern at this stage of the Core Strategy preparation process that there is a lack of a complete and robust evidence base. Paragraph 1.12 of the Planning Inspectorate:- “Lessons Learnt Examining Development Plan Documents” (June 2007) states that “Given that the options should also be informed by evidence, we would expect the evidence base to be substantially completed at preferred options stage.” Whilst this consultation exercise is a ‘Further issues and options’ consultation it is essential to have a good deal of the evidence at this stage. The expected step change in the delivery of housing from 2008 onwards (2740 per annum in RSS Proposed Changes) is key to delivering development in areas that can deliver. Therefore, at the very least, the basics of a SHLAA should have been made available to Consultees who could then assess that information to formulate a view on whether or not the Strategic Vision can be delivered.</p> <p>Paragraph 3.5 of the Core Strategy Settlement Study lists a number of supporting documents, stating which have been, or are currently being produced. It states that an Urban Potential Study is to be completed in Spring 2008. This is itself an important document, which should have been completed when the issues and options for the spatial vision and strategy were being developed. There is very limited evidence available to clearly and fully support any of the four options contained within the Core Strategy – Spatial Vision & Strategy. Without this evidence base, the responses to the Spatial Vision and Strategy are preliminary in nature and a further opportunity for comment should be provided when this becomes available. The situation is therefore currently contrary to the soundness test vii, which states that “The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.” Furthermore, Urban Potential Studies have to a certain extent been superseded by replacement Government guidance and Strategic Housing Land Availability Assessments (SHLAA) should now be prepared. Therefore, as soon as the Council eventually publishes their Urban Potential Study, which, it is noted, has not involved any public consultation (other than the initial methodology), the Council will have to prepare a SHLAA. The availability of land (both urban, rural, brownfield and greenfield) is crucial in understanding the deliverability of the identified options in this consultation.</p>

Rep ID	Name / Organisation	Issue	Summary of Representation
			The Settlement Study also refers to an Employment Land Review, stating that this was completed in December 2007. This document is however not available in the public domain and is not due to be published until the end of March 2008, which is after the end of the further issues and options consultation period. The quantity of available employment land is also important in producing viable and achievable options for the spatial strategy within the Core Strategy. Given the identified conflicts/restrictions between finding sufficient employment and housing land in certain options, this is a most important part of the evidence base.
76/ 00531	Walker Morris on behalf of Mr & Mrs Hopwood	Links to RSS	It is pleasing to see that this version of the Core Strategy takes account of the Yorkshire and Humber Plan Incorporating the Secretary of State's Proposed Changes, 2007 ("the Revised Draft RSS"). The Revised Draft RSS sets an annual requirement of 2700 dwellings per annum or 48,600 over the life time of the plan. It is therefore implied that the LDF will have to allocate for significantly more than was previously thought. In fact, with the (almost) doubling of the housing requirements for Bradford, there will be a strain put on the Council to allocate appropriate amount of land for housing in sustainable locations.
		Annual Monitoring Report	It is noted from the 2007 Annual Monitoring Report that with these new figures and the requirement by PPS3 not to take account of windfall developments, means that Bradford are required to allocate sites for around 32,400 dwellings. This figure is based on 9921 outstanding planning permissions and 6287 dwellings that can be sought from current phase one and phase two allocations.
			Considering these increased housing figures, the need to choose the correct spatial option is even more important.
		Regional City Status	It is also noted that the Council submitted comments to the Government Office promoting Bradford to regional City status, this is fully supported. However, the increase in housing provision should also be supported in order to accommodate the incoming population as a result of being awarded regional city status.
80/ 00533`	Turley Associates on behalf of Mr Poolton	Evidence Base	Before turning to our preferred spatial options, it is of general concern that these options are being pursued in the absence of an adequate evidence base. It is necessary to better understand the currently available resources of land, where it is located, and what development type is may be suited to, in order to make strategic decisions on the spatial approach to be adopted.

Rep ID	Name / Organisation	Issue	Summary of Representation
			We would suggest that as a minimum, the evidence base needs to include the documents listed at Paragraph 1.32 before any decision is made on the preferred spatial option. If this is not the case, it may be that the resulting core strategy is found to be unsound. That said, we appreciate that the scale of growth is of such a scale that in outline the options do not seem unreasonable as a starting point for a strategy.
97/00546	Yorkshire & Humber Assembly	Terminology	It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) replaces the terms "Regional Centres" with "Regional Cities", "Sub Regional Centres" with "Sub Regional Cities and Towns" and "Principal Service Centres" with "Principal Towns". The Core Approach of draft RSS is not changed by the Proposed Changes. It is worth noting that the Assembly in its response to the Secretary of State's Proposed Changes to draft RSS (2007) suggested that Bradford should be a Regional City.

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