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BANDAG - Keighley responds to the Core Strategy 2014. (Please note that there are links on this document that will open other documents that further explain or substantiate concerns along with other links that give example of the existence of the physical that needs to be conserved, preserved and enhanced if you are to meet the aims of the 2014 strategy.)

Firstly - BANDAG - Keighley, as a local group with over 650 friends and members, it has actively sought to be part of any formal public consultation process,. Whilst included on previous consultations was not sought out to participated in the New Core Strategy.

Secondly - even though it has attended former Public Consultations it learned that whilst we are told that the meetings have been held to consult it should state that it is to inform as we were told the things are 'fixed' and that proposed changes were not possible? i.e. At the Keighley Heritage public consultation we proposed that the historic paths should recognised and be preserved, conserved and enhanced as part of the heritage programme - We were told that it would not even be considered!

Thirdly - we would like to state that given the length of the Core Strategy and related documents - there has not been a sufficient length of time for the consultation period

Fourthly - The Keighley Heritage public consultation proved to be an information dissemination process - we were told that it was too late to forge any change no matter how valuable it could prove. The Core Strategy document does not state how Actions Groups and Parish/Town Councils will be able to influence local LDPs

Ultimately, when Bradford Council failed to provide a 5 year Land allocation the Housing Developers had a field day in obtaining sensitive land banks as a result.

Q. What recompense mechanism is in place if Bradford Council fails to provide the conditions for sustainable Town and district development, if it fails to provide the conditions (i.e. maintenance and enhancement and reconnection of the existing alternative transport network that are presently being destroyed though Council practice)?

NOTE: The following comments make reference to only some of the Core Strategy proposals, however the comments could equally apply to other sections too. To repeat statements over and over again would not keep our response succinct so our comments refer only to a sufficient number of your objectives to get the point over!

Transport and infrastructure

3.86 Public transport corridors should radiate from within settlements to link into main centres of activity and provide the scope for prioritised, high quality and efficient public transport services. Railway stations, park and ride sites and locations along bus routes can all act as 'nodes' for development to encourage a greater use of public transport. In terms of any peripheral growth areas public transport routes can provide a structure to

safeguard or create green wedges of open space or countryside. The transport orientated approach does not seek to 'eliminate' the car – but balance and reduce its use. Dual careers, the decentralisation of activities and greater specialisation and increased leisure time are all inducing growth in the need to travel. This Strategic Core Strategy policy, along with the District Transport Strategy, seeks to ensure that more of these journeys are made by public transport, foot and cycle.

3.127 Creating a well connected network of routes and spaces which feel safe and are accessible for all can help to encourage people to travel on foot or by bike rather than by car. This can help to promote healthier and more sustainable lifestyles as well as encouraging social interaction between different members of the community.

P84 E. Transport

1. Ensure that strategic patterns of development maximise the opportunities to use non car modes of transport and reduce the overall need to travel through the application of accessibility standards (see Appendix 3).

Spatial Vision, Objectives and Core Policies

P 54 "Improving opportunities for walking, cycling and horse riding, establishing strategic green links and enhancing the rights of way network in urban and rural parts of the district

P43 5. Create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation.

Declaration of intent in your Core Strategy document is very good however, BANDAG - Keighley asks: - Where is the practical application or intention to date? i.e. It should be noted that Keighley District has a serious issue with illegally closed footpaths, unmaintained footpaths, the breaking up of a substantial network of historic paths.

NEWS ARTICLES THAT SHOW THAT NO ACTION IS BEING TAKEN TO PRESERVE OUR EXISTING NETWORK OF PATHS

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5.2.17 Greater use of walking and cycling as modes of transport, particularly over short distances, requires encouragement and investment. These short but vital links in a journey can often influence the principal modal choice.

A historic network already exists in Keighley but they have been neglected and indeed their appears to have been an ongoing Bradford Council policy to destroy them!!!

3.98 The public rights of way network in Bradford District includes over 1100km of public footpaths, bridleways and restricted byway. Some of these routes form parts of locally and nationally recognized promoted routes such as the Dales Way, the Bronte Way and the Great Northern Railway Trail. However a large proportion of the network does not form part of any high profile promoted route but does perform a vital role in the day to day lives of Bradford and people employed in the District. The Rights of Way Improvement Plan aims to assess the extent to which the network meets present and likely future needs and includes actions to secure an improved network. The rights of way network represents an important resource and work on identifying strategic green infrastructure networks needs to reflect this.

If there is no active policy put into force to deal with these footpaths NOW all opportunity will be lost forever!

Doorstep to Destination Network of Paths - It already exists all that is required is that the paths are registered/reopened, conserved, preserved and enhanced! https://onedrive.live.com/?cid=c4368b0d915cb788&id=C4368B0D915CB788!2581&Bsrc=Share&Bp

ub=SDX.SkyDrive&authkey=!Aiq1ATrdnFyX550

5.7.50 Policy DS4 seeks to ensure that new developments get the movement framework right by creating a network of routes which connect to where people want to go, and which offer choice and a pleasant experience, particularly for those travelling by foot. Only Brownfield in town sites should be developed (in the square mile of in town derelict sites set back from the Worth River so that the main 'Doorstep to Destination' network of routes can be conserved preserved and enhanced (with direct routes to the Railway! - It already exists!

Strategic Core Policy 4 (SC4): Hierarchy of Settlements

P41 Improve public transport systems and services and increase opportunities for walking and cycling, in particular along the Leeds Bradford Corridor.

BANDAG - Keighley asks - Why the Core Strategy is so Bradford centric - Alternative transport networks must surely be joined to other high population areas - i.e. In 2012 the population of Keighley is recorded as 98,741 yet there is not mention of its Airedale Greenway that connects Keighley to the Bradford Leeds corridor that has been left neglected even though it is only 5 years old?]

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P54 Further work to define Green Infrastructure will be carried out through the preparation of the other Local Plan documents. Locations for development will be identified that offer opportunities to enhance Green Infrastructure and principles for design will be set out to deliver this.

BANDAG - Keighley asks - It has been lobbying Bradford with information about opportunities to enhance the Green Infrastructure; to give due credit so has Keighley Town Council and KWEP (Keighley West Environmental Project - How is it that they have not been recognised within this document?

Green spaces and corridors which can be assessed as making a significant contribution towards the above criteria will be protected.

Keighley(North Beck) Gateway to the Pennine Way

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The Keighley Gateway to the Pennine has the potential to give access from Keighley's town centre to the Pennine, Millennium and Bronte way Countryside all the way! This could make Keighley a destinations for the 150,000 plus people who traverse this networks bringing visitors in their droves along with new Rural and in town Business opportunities!

It already exists but for a couple of hundred yards; all that is required is that the illegally closed paths registered/reopened, conserved, preserved and enhanced! Further, historic footpaths that were never formally closed could be used to negotiated the right of way where the couple of hundred yards are required to connect the paths waterside/valley bottom all the way

INDEED Natural England will fund the project with £150,000 if the missing 100 yards of footpath it aquired and the project is approved!!! (Credit to the negotiations of Town Councillor Peter Corkinday, District Cllr, Jan Smihies and Town Councillor Brian Morris!.

P91 Support initiatives for the sustainability and diversification of agricultural and rural enterprise

K. Opportunities for business relating to the Districts unique environmental assets and challenges, including sustainable construction, renewable energy, resource and waste efficiency and environmental technologies and the 'low carbon economy'.

Page 97 Value the historic networks of narrow winding lanes, footpaths and packhorse trails and encourage their use for recreation linked to the local,

regional and national cycle and footpath routes.

Credit to the negotiations of Town Councillor Peter Corkinday, District Cllr. Jan Smihies and Town Councillor Brian Morris - Businessess along the North Beck support any progress for the Gateway to the Pennine way from Keighley's town centre! They look forward to rural enterprise opportunities this corridor the the South Pennines will bring!!!

P83 Protect and enhance landscape character and the range of habitats and diversity of species found in the wetlands, woodlands, Pennine Uplands and upland fringe areas of Airedale -

E. Environment

- p97 1. Protect and enhance the biodiversity and landscape character of the Pennine Upland, Wilsden, Worth and North Beck Valley, in particular the cultural associations of the Bronte landscape and the dense patchwork effect of stone wall field boundaries . Environment
- 1. Protect and enhance landscape character and the range of habitats and diversity of species found in the wetlands, woodlands, Pennine Uplands and upland fringe areas of Airedale
- 2. Protect and enhance the integrity of the South Pennine Moors SPA/ SAC and identify measures to support valuable upland fringe habitats and manage access to reduce the impact of increasing visitor.
- 3. Improve green infrastructure along the Airedale river, canal and public transport corridors.
- 4. Protect and enhance river, beck and canal corridors, their value for biodiversity and heritage, potential for reducing flood risk and role in

Your own paid Consultation documents recognise the North Beck as a conservation area of SEGI

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5.4.10 Blue/ green infrastructure, which encompasses the Leeds-Liverpool Canal, moorland reservoirs, the network of river and beck corridors (identified as a strategic asset in Policy SC6 relating to Green Infrastructure) and the recently created mirror pool in the city centre, will become an increasingly important element in the Districts future. Preparatory work promoting the aspiration of opening up the Bradford Beck Corridor and the introduction of Sustainable Urban Drainage highlight the importance of blue/ green infrastructure in bringing benefits for both people and wildlife, while also addressing flood risk and increasing the districts resilience to climate change.

Keighley is threaded with its own green/blue valleys vis-à-vis the Worth and the North Beck both have more potential than the Bradford Beck so why does the report ignore the Blue/ green already lined with a network of paths that are being taken from us bit by bit!!! Alongside this river through Keighley East where once there was industry there would be the opportunity meet with a brown before green policy whilst building desirable home near alongside blue/green corridors with all the UPHILL VIEWS!

Brown before Green - Appropriate housing development proposals that will bring life back to dereliet parts of Keighley with the capacity to turn it into a desirable in town residential area near all services and transport network with uphill views and riverside walks nearby!!! https://onedrive.live.com/?cid=c4368b0d915cb788&id=C4368B0D915CB788!2621&Bsrc=Share&Bpub=SDX.SkyDrive&authkey=!Asgg9j80LIXyDMM

Locations for development will be identified that offer opportunities to enhance Green Infrastructure and principles for design will be set out to deliver this -

P 62 Making Great Places

Good design is key in terms of realising the spatial vision and strategic objectives for the District. It can help to create memorable and attractive neighbourhoods, streets, buildings and spaces which are safe and accessible to all. Therefore it is important to ensure that the development growth planned in the Core Strategy contributes to creating great places for people. Strategic Policy SC9 sets out what is expected in terms of the overall quality of place in the District and seeks to embed the principles of good design at all levels of decision making. It provides a framework for the more detailed design policies DS1 - DS5 in section 5.

Keighley's topology is not like Bradford it can boast a ring of Green!

The Jubilee Book of Keighley 1932

"From any of Keighley's open space or main thoroughfares townsman or visitor can very literally lift up his eyes unto the hills. The there they are on every side, far enough away to free the observer from any feeling of being hemmed in by enclosing heights, but at the same time near enough to enable him to watch the play of light and shade on the chequered greenery of pastured slope and slanting meadow or catch the glint of the sunshine of the glooming of cloud shadows on rock crowned ridges, or heather and bracken clad uplands, where pasture and woodland merge the moor!"

Good design is to recognise that this is conserved to leave Keighley 'feeling' with the actual fact that it set within the South Pennines! Horrifically the most beautiful - Parkwood, that was gifted to the People of Keighley in the late 1800s and can been seen from all of Keighley is being sold piece by piece with the latest part being sold, against much public outcry, off to be turned into an inappropriate Lorry park!

Keighley - LOOK UP and you will see our 'Ring of Green' - The countryside and the fabulous Parkwood!!!

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- P83 3. Improve green infrastructure along the Airedale river, canal and public transport corridors.
- 4. Protect and enhance river, beck and canal corridors, their value for biodiversity and heritage, potential for reducing flood risk and role in improving connectivity between urban and rural areas.
- 5. Leeds-Liverpool Canal Corridor and key beck corridors
 Enhance their positive contribution to recreation, tourism, transport, heritage,
 biodiversity and environmental quality within the district
- 6. Regeneration programmes in the urban core of the Regional City and Keighley Help to achieve improvements in environmental quality and encourage healthier lifestyles

Keighley has its River Worth and North Beck these are part of the blue/green infrastructure, they are suitable as public alternative transport networks, they could serve the whole population as part of a 'Doorstep to Destination' network of paths yet not once are they mentioned.

Not only useful for traversing they could also be a heritage trail encouraging visitors as they also lined with historic, once water powered, mills! Unlike the Leeds Liverpool canal the River Worth is minutes from the town centre and visitors could bring business and trade into the Town!

6. Conserve and enhance the designated and undesignated heritage assets in particular those within the boundary of the Keighley Townscape Heritage Initiative and Saltaire World Heritage Site

Keighley's own industrial history, precedes Bradford's yet it goes unrecognised. The history of both the Worth and the North Beck should be recovered and used to both attract visitors and used to encourage outdoor education programmes in our schools and colleges. With a 'Keighley Gateway' a walk could be started from Keighley Town centre and could include Castle mills and Stell in the heritage trail!!!

North Beck - some History:

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North Beck Keighley one reason why Keighley should formally become a heritage town! https://onedrive.live.com/redir.aspx?cid=c4368b0d915cb788&page=view&resid=C4368B0D915CB788813187&parid=C4368B0D915CB78811819&authkey=!Al3Pt8NgSjJYnmU&Bpub=SDX.SkyDrive&Bsrc=Share

P84 Recognise that development could lead to opportunities for improving green infrastructure

and flood storage provision, particularly in relation to the Upper Aire.

5. Woodland, groups of trees and habitats are key elements in the landscape and efforts should be made to increase tree cover, particularly in areas where development might be located

Used both as a blue/Green corridor, as doorstep to destination network of paths, the bio-diverse valley's could also be used for flood storage (by way of trees holding the water!)

OF GRAVE CONCERN is the proposal to develop the Worth Valley! Whilst identified for mixed development the reality is it could affect Keighley's main tourist attraction - the Keighley and Worth Valley Railway (that could, if we could encouraged people to come into Keighley's town centre, boost Keighley's local economy) will be detrimentally affected if this plan is pursued:

The following shows how insensitive development can ruin tourism and local economies. Our own research has reveals a pattern of ruin in other areas!

- On Leighton Buzzard narrow gauge railway, where it once ran through fields it now runs through a housing estate
- On the Mainline Steam Trust Loughborough, where it all once ran through fields it, part of it now runs through a housing estate

On the Isle of Man Railway, where it once ran through unspoilt countryside, it now runs through an industrial estate for the first mile and a housing estate for the final 2 miles of the line.

The outcome is that the journeys are less attractive (who wants to journey on a heritage railway through a housing estate) and with Loughborough in particular, complaints from the new residents has led to attempts to restrict the timetable to a 9 to 5 operation only.

Even the Embsay Steam Railway has come into conflict with residents and there is a restriction on the use of the whistle and restricted acceleration restriction to reduce noise!!!

Worth Valley continued: It is noted that development plots along the Worth target for Keighley, Haworth and Oxenhope have been presented on different maps and appear to be full of gaps however, when put together it is clear that there is a planned ribbon of development that will spoil the whole steam train experience and will have negative affect on the whole of the district of Keighley including Haworth!!!

Keighley has sufficient in town Brownfield sites to meet all housing requirements AND given modern industry. Businesses should be located along the main transport network routes and not at the end of historic cobbled roads and footpaths in eco-sensitive areas!

5. Leeds-Liverpool Canal Corridor and key beck corridors

Enhance their positive contribution to recreation, tourism, transport, heritage, biodiversity and environmental quality within the district

The network of paths leads into Keighley and could connect to its existing network of paths via a main route that follows the River Worth and North Beck (the old footpaths that brought the workers to the water driven waterside mills) - The Airedale Greenway that connects Keighley to the Bradford Leeds corridor has been left neglected even though it is only 5 years old - this wonderful Greenway would be the template for the rest of the proposed Doorstep to Destination network (in town)enhancement!

There is no mention that the Leeds Liverpool canal is dangerously silted up and in need of extensive remedial works to the infrastructure. Bradford Council could and MUST put pressure on the water management authorities to dredge the canal, and undertake the back-log of maintenance which will make it more navigable AND will hold more excess water.

P 84 7. Use the opportunities provided by increased development in the Principal Towns of Keighley and Bingley and the Local Growth Centres of Silsden and Steeton with Eastburn to maximise renewable energy generation and energy efficiency through CHP and hydro energy.

Opportunities to improve Green Infrastructure linked to key areas of change

1. Bradford Shipley Canal Road Corridor Urban Eco-settlement Establish innovative means of low carbon living and create space for water management and sustainable transport routes

The North Beck is full of weirs that could be used to run many hidden yet effective water turbines!!! Just remember that they were part of the becks designed as it was once used to drive a whole industry - these very same weirs could be used to run generators to serve local homes! IT ALREADY EXISTS

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Planning for Prosperity - Transportation and Movement Section 5 Travel Reduction and Modal Shift

5. 2.13 Addressing traffic growth and congestion is a major issue for the District. A key aim of integrated land use and transport planning policies is to reduce the need to travel and to reduce the length and number of journeys, particularly those made by private car and road freight. The Core Strategy includes a number of complementary policies to attract more journeys by foot, bicycle and onto public transport, encourage developments in locations well-served by public transport or close to a range of services; and introduce measures aimed at achieving a shift away from traditional models of vehicle use. Policy TR1 covers the specific contribution that transport planning makes to effect modal shift and travel reduction. This policy is linked to and dependent on the application of the subsequent policies around demand management and network management and enhancements.

Creating a Successful Economy

p116 E. Supporting priority <u>business sectors and clusters through the provision of</u> appropriately located sites and premises.

F. Encouraging economic enterprises which develop or enhance the viability of tourism, culture and leisure based activities, and the built and natural environment, whilst having regard to accessibility and sustainable transport local character and design.

Keighley has a unique one and only <u>opportunity to move Industries from areas where they have</u> become unsuitable - i.e. many businesses are in historic riverside locations that are no longer

suitable. Create incentives for businesses to want to move i.e. Stells on the North Beck to turn the whole valley into a conservation corridor! The modal shift could achieved by offering business relocation to areas that will lead to a reduction Road freight transport and overheads—while it will never disappear altogether moving companies to heavy transport road journeys as short as possible. This will also help by reducing ware and tear on the roads. Stells also suffers theft and vandalism because of it unsuitable remote location! Moved this company could prosper and so could the town with the valley attracting tourists and give the town a national name as "Keighley Gateway to the Pennine Way"

Business relocation proposals (note while your new proposal has reduced Greenfield site development there should be none whilst we still have Brownfield derelicts parts of Keighley!_https://onedrive.live.com/?cid=c4368b0d915cb788&id=C4368B0D915CB788!2572&Bsrc=Share&Bpub=SDX.SkyDrive&authkey=!AhmWlhVHeGReZk4

Rural and Principal town development!!!

5.1.1 The purpose of this policy is to establish the operational priorities for stimulating and managing the economy in spatial terms across the District principal towns and growth centres as hubs for the local economy. It will also help encourage diversification of the rural economy. The Policy will help support the renewal and regeneration of urban and rural areas thus contributing to the aims of Strategic Core Policy 3 – Working Together to Make Great Places together with Strategic Core Policy 4 which determines the hierarchy of settlements and their role in the economic development of the District.

A simple mechanism to bring more people into town is to stop the supermarket being able to sell clothes. If they want to sell them they should be made to open a clothes shop in the main town centre. This would mean that people would have to come out of Morrison's or Sainsbury's or Asda if they need clothes. Whilst in town they would use the shops and other facilities.

Tourism is a realistic goal but without a full strategy being implemented it can only fail! <a href="https://onedrive.live.com/redir.aspx?cid=c4368b0d915cb788&page=browse&resid=C4368B0D915CB788!2635&parid=C4368B0D915CB788!107&authkey=!Aq0lg17lSUtck00&Bpub=SDX.SkyDrive&Bsrc=Share&sc=Photos&type=5

In line with Localism we hope that this document is taken into full consideration as it meet 100% with what your paid Consultants recommendations and national policy!

This response the Core strategy is not exhaustive and BANDAG - Keighley would like to, along with this town's Town Council and along with Keighley's district Parish Councils have a say in the design of our town and would like to give further representation. We look forward to receiving your response to our questions and wish it to be known that we would like to engaged in all matters related to the latestCore Strategy!

Archer on behalf of BANDAG - Keighley
Pressing for a SUSTAINABLE Local Development Plan Over 650 local friends and members (including local businesses) Save Keighley website: