



ILKLEY PARISH COUNCIL

Atten: Stephen J Pratt BA (Hons) MRTPI,
The Inspector
Bradford Metropolitan District Council
Victoria Hall
Saltaire
BD18 3JS

March 2nd 2015

Dear Sir,

Re Ilkley Parish Council – Late Statement

As Clerk to the Council, I have been asked to write to you by decision of the Council taken on March 2nd 2015, and by arrangement with Mr Tony Blackburn, Programme Officer, acting for Bradford Metropolitan District Council.

We understand that Bradford MDC is intending to continue to press for the adoption of the Local Plan that was presented during the Public Consultation period despite the fact that the economic calculations underpinning the housing requirement estimate contained in it have now been dropped. These were discredited having grossly inflated the number of jobs the construction industry could deliver, the prospective inward migration of construction workers and the number of homes they would need and, in consequence, housing requirement estimates across the plan period. The figures were presented by Edge Analytics and GVA.

We are aware that a fresh rationale for the Plan has been formulated which rests upon a different evidence base but which puts the estimate for housing requirement at approximately the same level as before. Furthermore, we are aware that this evidence base was also produced by Edge Analytics. We find this both surprising and disturbing. The current projections which yield high housing requirements, factor in 'Unexplained Population Change' (UPC) which raises estimates of population growth well above that presented by the ONS. We would like to point out that the ONS has already addressed the issue of UPC (see attached paper) and there is no need for Local Authorities or Planning Consultants to factor it into their calculations. To do so would artificially inflate projections and lead to the adoption of a Plan which was not only undeliverable but would also lead to additional harmful consequences. These include:

- Placing the Council in a situation of chronic under-delivery for the lifetime of the plan

- Undermining the delivery of brownfield development and urban regeneration because of an over-supply of greenfield sites
- Unnecessary destruction of greenbelt and habitats
- Immediate and ongoing costs involved in building and maintaining the costly infrastructure required to serve a dispersed population living within the greenbelt

We believe that the Council is misled in this matter and query why it re-engaged Edge Analytics to deliver a further study when the previous housing requirement estimate it submitted was incorrect by a wide margin and was based on a highly dubious calculation.

We also draw the attention of the Council to the following:

- That the report from Edge Analytics presenting the new estimates lacks transparency. It does not show any figures other than final estimates therefore the working and data employed in the calculations cannot be checked or verified.
- That the data presented by Edge Analytics in relation to the Leeds City Council Local Plan was queried by the Leeds City Council Scrutiny Board – Regeneration in 2011 (see attached Scrutiny Inquiry Report – Housing Growth, Scrutiny Board Regeneration, October 2011, Leeds City Council) and again on November 11th 2014.
- That Edge Analytics may not always have been entirely consistent in the arguments it has presented regarding population growth in Leeds. Please see attached (Appeal Reference App/N4720/A/1/2208551; Town and Country Planning Act 1990 Appeal by Miller Homes)

We would also like to alert the Council that senior Council officers and Elected Members may be open to accusations of misfeasance if they knowingly present incorrect data to the public or the authorities or if they use such data to justify a strategic plan. We strongly suggest that the Council uses the lower population estimates based on ONS (SNPP-2012) projections rather than those presented in the Edge Analytics PG-10 year or PG-5 year scenarios. We further ask that it pay due regard to the fact that if the higher household formation rate (Scenarios Option B) is accepted there will be a lower need for family housing as the newly forming households will be skewed towards single occupiers. The ONS will be publishing further data on 26th February 2015 which the Council might wish to consider in updating its estimates.

Yours sincerely

Clare Smith

Mrs Clare Smith

Clerk to Ilkley Parish Council