

# Ilkley Civic Society



Tony Blackburn,  
BMDC Local Plan Programme Officer

By e mail

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17th April 2015

Dear Mr Blackburn,

Here are the comments on the homework items from Ilkley Civic Society.

## **Bradford Core Strategy Examination in Public**

### **Comments on "Homework" by Ilkley Civic Society**

- **PSF006 DCLG Brownfield Consultation Paper**
  - Q 2. We agree that Local Authorities should be required to publish data on potential brownfield sites.
  - Q 4. We agree that Local Authorities should be required to regularly update information on potential brownfield sites.
  - Q 5. We agree that underperforming Authorities should be designated.
  - Q 10. We agree that failure to publish relevant information should lead to automatic designation.
  
- **PSF011 Councils must protect our precious green belt land**
  - Local people in Wharfedale agree that protecting our precious green belt must be paramount and don't want to lose the countryside to urban sprawl, or see the vital green lungs around their towns lost to unnecessary development. We do not believe that the Local Authority has given sufficient cognisance to this policy and have allocated housing to the valley without sufficient consideration of the importance of the Green Belt.
  
- **PSF019aii Amended Housing Distribution , N Varley**
  - The Society shares the concerns raised in Mr Varley's paper.
  
- **PSF019 CBMDCEIP Matter 4C Amended Housing Distribution**
  - The Council claims that the amendments were made

- To reflect the discussions over the merits of re-instating Burley In Wharfedale and Menston as Local Growth Centres;
    - To reflect the argument for some re-distribution back to those settlements whose housing targets has been decreased on the back of the HRA conclusions.
  - These discussions were one-sided in that they involved only those parties concerned to increase the allocation of housing to these settlements. Members of local communities were not invited to take part in the discussions contrary to the spirit of Paragraph 1 of the introduction to the National Planning Policy Framework, under which the Core Strategy was produced, states that it provides, “a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.”
  - The discussions focussed only on the HRA and ignored other equally strong arguments against development, notably the fact that most, if not all, the sites involved are in the Green Belt and should be protected in line with Government policy
- **PSF020 CBMDC Further Statement on Exceptional Circumstances for Green Belt Change**
    - In paragraph 2.1b the Council claims that in proposing to release land from the Green Belt they have considered whether there is, “Potential to release green belt land without significantly undermining the functioning of the green belt at a local and strategic level”
    - In the Society’s opinion the proposed release of land in Wharfedale would most certainly undermine the local functioning of the Green Belt.
    - Although the actual impact will not be known until specific sites are allocated the sites listed in the SHLAA have the potential to destroy the Green Belt in the valley; effectively joining up the settlements of Menston and Burley and significantly reducing the open space between Burley and Ilkey.
    - Given that there are few brownfield sites within the valley and that to meet the proposed distribution of housing most of the development will have to be on Green Belt land the Society believes that the allocation in the Publication Draft of 1,600 houses to Wharfedale is excessive and that the additional 900 proposed in the Modification cannot be justified.
  - **PSF037 CBMDC Further Statement on Transport (A65)**
    - In Para 1.3 the Council notes that, “Compared with other ‘A’ roads in the **district** the A65 is less of a concern. Data from the Department for Transport published on their website shows that the A65 eastbound average speed is 31mph westbound is 32mph (morning peak 7-10am) and there has been improvement going towards Leeds since 2013. Comparing this with other key transport corridors in the district, A657 averages 11mph, the A650 averages 21mph and speeds on Bradford’s outer ring road (A6181) average 12.7mph. (Figures taken from <https://www.gov.uk/government/statistics/congestion-on-local-a-roadsengland-october-to-december-2014>)”
    - The section of the A65 in the Bradford District runs from the boundary with the Craven District east of Addingham to the boundary with Leeds at Menston. This includes both the Addingham and Burley by-passes and is not comparable with the other roads listed. The critical section of the A65 that will be affected

- by extra traffic generated by development in Wharfedale is in Leeds where the source quoted above shows an average speed eastbound, the direction commuters will be travelling in the morning peak, of 16-17 mph.
- The Council's response clearly shows that the impact of development in Wharfedale on the neighbouring authority of Leeds has not been considered and in referring only to the A65 in the district is misleading.
  
  - In Para 1.4 the Council claims that, "the Transport study in support of the core strategy (document EB/039pg 80) highlighted the corridor as having congestion problems with the level of development proposed at the time," and that, "the impact of current proposed development is likely to be less significant than outlined in the study."
  - The Transport Study quoted also concluded that, "This route, (is) already congested at peak times," and, " Apart from limited improvements, constraints of space to the highways junctions on this corridor make it unlikely that significant extra highways capacity can be provided on this already congested corridor." Consequently the proposed 2,500 houses in Wharfedale can only worsen the congestion on the A65 in Leeds indicating again that the authority has given insufficient consideration of the impact of its proposals on the neighbouring authority.

Please contact me if you need any clarification.

Kind regards,

Yours sincerely,

Helen Kidman  
Chair  
Ilkley Civic Society