

Ilkley Civic Society



Mr Tony Blackburn
Bradford Metropolitan District Council

By e mail

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Dear Mr Blackburn,

Bradford Local Plan - Main Modifications Matters, Issues and Questions Response

21/04/2016

Helen Kidman on behalf of Ilkley Civic Society

Matter 1 HRA

Bradford Council's plans to increase the housing numbers in Wharfedale run counter to meeting the requirements of protecting the SPA. The green belt areas of Wharfedale provide wild-life corridors and reducing these puts pressure on bat corridors and bird migration routes in addition to land-based wildlife.

Linking up the Wharfedale settlements, as green belt usage threatens, would severely affect the wildlife which needs protection.

Matter 3

Bradford Council's proposed housing figures are now many years out of date and the council has not demonstrated that it has reviewed them in the light of changes to legislation and policy and revised advice from statutory bodies that have occurred since the plan was formulated.

1. Recent changes include:

Benefit Changes

Spare room rent supplements (bedroom tax)

Child support changes

Council tax on second homes (there is a significant number of second homes in this area)

Working Families Tax Credit cuts

Personal Independence Plan changes

The impact of these legislation changes in respect of the Local Plan is to inhibit the formation of new households and thus the demand for new homes.

Other legislation and policy changes

Brownfield land. There is again more national emphasis on brownfield land being used first. Councils should maintain a register of Brownfield Sites but BMDC has not yet published one. We should like to see this produced before the SHLAA is considered.

Regeneration in Bradford

There is no indication that the development of the Leeds City Region, the Northern Powerhouse or HS2 and 3 will impact during the life of this plan. Improvements to the rail services in terms of new stations benefit the Airedale Line, not the Wharfedale Line. The Ordsal curve due to be in place at the end of 2017 will improve TPE through Leeds and Northern through Bradford Interchange.

Employment Changes

The impact of the economic downturn is prolonged. The number of new jobs now forecast in Bradford District is down. The housing numbers proposed by Bradford Council were predicated on new jobs, so BMDC should reduce the housing numbers needed commensurately.

2. LPEG review

Towards the end of last year the Secretary of State commissioned the 'Local Plans Report to the Communities Secretary and the Minister of Housing and Planning'. This was published in March 2016. It confirms assertions by objectors that Bradford Council has substantially over estimated housing need and identifies Bradford Council as among a small number that have done so by in excess of 500 homes per annum.

There is an urgent need for BMDC to review its figures taking account of the remarks in this report.

3. Land banks, approved house building and empty homes

These are now much better understood and quantified than when the first BMDC housing estimates were prepared. Some housing land in Wharfedale, in council ownership, remains undeveloped two decades after it was first designated while plans for green belt are well-advanced even before any releases are agreed. One residential site has remained empty for over 40 years.

There are some 4800 planning permissions for new homes granted in the Bradford District which have not been built and an estimate of 18 000 houses are standing empty. These should be used before any green belt land is released.

4. Flooding

The specific issues in Wharfedale are well-known. The disaster of Tadcaster Bridge and the flooding of the lower Ouse can be attributed to the high flow of water on the river Wharfe. In the recent floods in December 2015, the run-off in Ilkley was so severe that numerous houses were at risk of very localised flooding where drains failed and the sheer volume of water overwhelmed the system. There was sand-bagging of property at 4-500 feet above sea level in Ben Rhydding. Ilkley was cut off as the A65 was blocked both east and west of the town by flooding and the moor road to Burley Woodhead was blocked by flooding in one of the dips. The rail service to Leeds was suspended for several days. Middleton was cut off from Ilkley as both road bridges were closed. *This meant that access to emergency services was curtailed (restricted police and ambulance, (except the Yorkshire Air Ambulance)). ???*

Bradford's Strategic Flood Risk Assessment underplays the flood risk in Wharfedale. It needs updating to reflect the increased risks and the risks to new areas. Some of the land of Coutances Way, Ilkley, which flooded in December 2015 had not previously been flooded.

See pictures enclosed of flooding on and shortly after 26.12.2015 in attached Powerpoint file. (Hard copies can be provided if needed.)

5. Infrastructure

Duty to cooperate with neighbouring authorities

There is a renewed need for cooperation with both Leeds and North Yorkshire with respect to developments in Wharfedale, especially with regard to the impact of development on infrastructure. Rail improvements should also be subject to ongoing dialogue. All the authorities must cooperate to mitigate the impact of flooding.

Education

The announcement that all state schools will become academies by 2020 will create further problems for an increased population. Where schools become full, in towns such as Ilkley, there will be no onus on the state to provide access to education as the schools will all have control of their own admissions policies. This will result in children and parents travelling significant distances to other facilities putting even more pressure on the transport infrastructure. A number of children in Ilkley are already commuting over 30 miles daily and such long journeys will increase. There will be no guarantee of the same school for siblings leading to logistical problems for many families. This will hugely impact on traffic. The prospect of these problems will inhibit people with children from moving into the area. So far, no new school sites have been identified.

6. Repeated assurances by ministers that the Green Belt is safe from Development

Ministers, including the prime minister have assured the public that 'we will not build on the green belt'. This issue should not be side-stepped by de-classifying green belt and then releasing it for housing. Green Belt could be 'exchanged' for other land, but that isn't possible in Wharfedale, where the North Yorkshire side of the valley is designated an AONB and the moor has SPA status. There is no 'non green belt land' with which green belt land may be exchanged. It is contended that the green belt to the east and west of Ilkley is of high landscape value and acts as a buffer to the AONB. It is woodland, sheep pasture and hillside at least as attractive as the AONB land on the other side of the valley. This will be lost if it is used up for housing. No virgin green belt land should be released until the brownfield sites are all re-developed, with only one exception - brown field sites within the green belt, which should be scrutinised very carefully indeed.

Yours sincerely,

Helen Kidman

Chair
Ilkley Civic Society