

PROPOSED MAIN MODIFICATIONS – BRADFORD CORE STRATEGY DPD

ILKLEY DESIGN STATEMENT GROUP (IDSG) REPRESENTATIONS

REPRESENTATION FORM PART B QUESTIONS 4-10

4	5	6	7	8	9/10
MM1	Object	Yes	No	All	<p>9. IDSG original representations evidenced the unique position of Ilkley – minimal deliverable and developable brownfield sites (insufficient to provide and achieve the 50% housing requirement of MM96) and minimal sustainable development locations. The 1000 houses now proposed must be reduced in number to one within the bounds of sustainability and less than the 800 originally proposed. Ilkley cannot be considered a sustainable location which reduces the need to travel in that many residents commute, mainly to Leeds, to work. Even the provision of the additional 5 hectares of employment land within Wharfedale will not significantly reduce the need to travel and additional housing will exacerbate this need to travel. Ilkley has no bus service to Bradford so Ilkley is not well served and the A65 is already used beyond its capacity.</p> <p>10. Reduction of the now proposed 1000 houses target for Ilkley to less than 800.</p>
MM2	Object	No	No	All	<p>9. IDSG support the objections by Burley in Wharfedale and Menston to their proposed enhanced hierarchy and increased housing distribution targets. The modifications will have adverse effects on Ilkley and Wharfedale generally – further pressure on the A65, schools and existing frailty of the infrastructure (the impact has not been quantified by the Plan). The modifications will prejudice IDSG’s</p>

resistance to designation of Ilkley as a Principal Town. The proposed policies for Wharfedale would render the Plan even less sustainable and increasingly unsound by these modifications by increasing pressure on the Green Belt and infringing HRA.

10. Reject all modifications for changes in Burley in Wharfedale and Menston's enhanced hierarchy and increased housing distribution targets.

MM8 Object No No All 9. For reasons stated above Ilkley housing distribution targets (both market and affordable housing) should not exceed the numbers in the original draft Plan. They should continue to be based on a "local needs assessment calculation" as envisaged by National Planning Policy Framework (NPPF) para 1. and the principles of the Localism Act 2011. The Government's Planning Practice Guidance headed "Housing and economic development needs assessments" refers to the scope of assessments at para 2 and the areas to be assessed. The Council document PS/F032 –"Further statement to clarify the use of the term "local need"" - fails to recognise this Government Guidance in that establishing assessment areas, smaller sub-market areas with specific features may be identified. IDSG suggest that the uniqueness of Ilkley represents such a housing market area- it is different from and completely out of line with the remainder of the Plan district. House prices reflect the north Leeds market not the remainder of the Bradford housing market.

10. Re-instate the original provisions relative to local housing need assessments to reflect settlement by settlement local needs calculations.

MM17 Object No No All 9. It is still unclear how Bradford is to review the Green Belt. IDSG

make the point that a selective review will not be acceptable as in the case of the neighbouring Leeds Plan where the Inspector required a comprehensive review of the Green Belt. Bradford document PSF067 has attempted to define exceptional circumstances for Green Belt changes but there is still conflict with NPPF para 82 and Government Planning Guidelines. The House of Commons Briefing Paper as recent as 4 January 2016 repeats and summarises the objectives of the Green Belt and makes it clear that “unmet housing need..... is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green belt”. West Yorkshire Green Belt is a single entity so consideration should be given to differing landscape qualities in the Green belt to ensure, especially in any comprehensive review, only low landscape value green space should be considered for development. IDGS also takes the view that in Wharfedale the modifications conflict with MM54 (IDSG support MM54). However MM54 must be paramount to and trump all other Core Strategy Policies relating to Ilkley.

10. Further modifications required to reflect above concerns.

MM19 Object No No All  
to 37  
etc.

9. Both the South Pennines and the North Pennines Habitats Regulations Assessment (HRA) impact Wharfedale and the 2.5 km zones overlap from Addingham to Ben Rhydding where the valley widens. The whole of Wharfedale is within the 12.5 km zone. Outside the built areas the HRA closely coincides with the Green Belt. HRA’s are in their very nature a proper constraint on development not only to protect directly areas of moorland themselves but also from pressure of additional usage by increased population in the surrounding areas. Building more

homes will increase that population so it is questioned if the HRA has been given due and serious consideration not only in respect of the increased housing distribution targets in Wharfedale but also with respect to the additional infrastructure requirements. Reflecting the HRA properly and adequately and giving due weight to it would result in a decrease in housing numbers in Wharfedale as suggested in previous representations.

10. Improved liaison with North Yorkshire County Council and its Implementation of the HRA in accordance with the duty to co-operate.

MM38 Object No No All to 47 9. Bradford City Centre, Canal Road corridor, Shipley and Airedale are predominant areas for economic growth and employment opportunities, yet housing targets in these central urban areas are to decrease and outer rural areas increase. This shows inconsistencies in the Plan and is contrary to NPPF policies to reduce travel to work. The modifications should be vice versa. The figures set out in criterion A at MM38 do not add up - neither in the original Plan nor in the modifications. There is a shortfall of 500 houses. Could there be other discrepancies? IDSG repeat here strengthening up the empty homes policy (HO10 p.194) – the most recent figure of 8,533 – to reduce overall housing targets. Sustainability, viability, deliverability and soundness of housing targets are questioned.

10. Further review of the housing distribution targets to render the Plan sound and viable; and correction of housing figures at MM38 within the Bradford/Shipley/Airedale districts.

MM51 Object No No All 52, 56 & 57 9. For the reasons stated earlier above IDSG rejects the revised and indeed the original housing distribution targets for Wharfedale. Evidence will be submitted by others objecting to the SHLAA modifications which IDSG endorse and support. In particular for reasons stated earlier any or

further encroachments into the Green belt are strongly resisted and objected to. MM 54 must be paramount as stated above.

10. Reduction in housing distribution targets for Wharfedale and enhancement of Green Belt protection.

MM63 Support Yes Yes & 69

9. IDSG supports the economic growth areas in urban locations with Ilkley somewhat peripheral (5 hectares distribution for the whole of the Wharfedale corridor). This level of new job opportunities and employment is to be welcomed in Wharfedale but if this is a need (not a target) of employment land then it should be reflected in housing targets.

Area (MM69)		jobs growth if proportionate	
City of Bradford	100 hectares	1165 per annum	72% approx.
Airedale corridor	30 hectares	355 per annum	24% “
Wharfedale	5 hectares	60 per annum	4% “
TOTALS	135 hectares	1600 per annum	*see below

If number of jobs is the key to housing need then Wharfedale should have a target of 4% (reflecting the preceding table) of the district total of 42,100 namely 1684 a slight increase over the original 1600 and more sustainable than the figure of 2500 proposed by the main modifications.

The travel to work policy is consistent with limited economic growth in Ilkley and consequential reduction in housing distribution targets to be commensurate with the above job growth proportions. IDSG have also noted that the Centre of Economic & Business Research have recently reported that Bradford is the only city in Yorkshire where growth will reduce in 2016 from 1.6% to 1.4% suggesting that the above annual jobs growth should be reduced from 1600 to 1400\* - questioning the preceding table as the correct growth figure.

MM65 Support Yes Yes

9. IDSG question how the new jobs statistic of 2,897 a year to 2030 can

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be so drastically and dramatically reduced by nearly half to 1,600. It is noted this is projected jobs growth rather than the original “aspirational figure”. How many of the other figures presented in the draft Plan are aspirational? The Government Guidance referred to at MM8 above on housing need states Plan makers should make an assessment of the likely change in job numbers having regard to the growth of the working age population. Assuming the Council followed this guidance to render the draft Plan sound in respect of the original figure of 2,897 then the reduced figure of 1600 must consequentially reduce to some degree at least pro rata the total housing distribution targets in the modifications now proposed.

MM72 Object No No All  
to 109  
& App 6

9. IDSG is of the view that overcrowding and consequent unmet housing needs within the Bradford urban area will not be resolved nor met by building new houses in Wharfedale where land costs are too high to build affordable housing. Such new building would conflict with NPPF both by increasing unnecessary pressure on the Green Belt and conflicting with the travel to work policy – e.g. increased emissions and air quality degraded. The A65 is already over capacity at peak times (MM1 above) and already vulnerable to increased traffic if 3,500 new houses are built in north Leeds at neighbouring Otley, Yeadon and Guiseley. Evidence has not been deduced by Bradford which discharges its duty to co-operate with Leeds on these issues. IDSG supports the Council’s promise to deliver 50% of new housing on previously developed land (MM96 ).It follows therefore IDSG continues to question the soundness and sustainability of the policy requiring Wharfedale (MM 108) to provide 30% of affordable housing on sites of 5 units or more.

10. Consequential amendments if the above objections are upheld

MM115 Object No No All 9. IDSG support the representations made by Natural England but reject

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any dilution of the policy restrictions relating to biodiversity and geological conservation. IDSG comments at MM19 above on HRA apply here also..

10. Removal of all or any modifications diluting conservation policy.

MM127 Support Yes Yes 9. IDSG supports the modifications enhancing flood risk protection.

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However more robust modifications are now required to provide a full review and assessment of flood risk and flood defences in Wharfedale following the 2015 adverse weather conditions and flooding. Accepted climate change predictions are that such weather are expected to be regular events in future years. In addition flooding due to run-off and re-emergence of local springs requires analysis to mitigate landslides on steep ground, standing water on highways, damage to land and infrastructure and ice on residential roads which have no priority for gritting. Consideration should also be given to extending the Wharfedale flood plain and introducing new design policies (DS5 p.294) to safeguard buildings from and mitigate against flood damage.

■ 17/01/16

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