

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.
(Additional Part B forms can be downloaded from the web page)

4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM28

5. Do support or object the proposed main modification?

Support

Object

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Effective

Consistent with National Planning Policy (the NPPF)

9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to a proposed main modification).

MM28 redefines the SAC / SPA protection zones as A, B & C. The outer edge of Zone C being 7km from the SAC / SPA boundary. The HRA demonstrated this to be the radius from within which most visitors to Ilkley / Rombalds Moors emanated, frequently on foot. 15,300 new homes are now proposed within the 7km radius amounting to approximately 36,720 people (at an average of 2.4 persons per dwelling). Crucially the proposed new homes are in clusters which encircle the Moors on all sides. The HRA identified 28 access points around the Moors the vast majority of which are footpaths. It notes that "wet blanket bog" habitat is a key constituent of the SAC / SSSI and it is the most vulnerable in terms of trampling, the impact of dogs, draining (maintenance of grouse habitat) and fires (both wildfires and those associated with maintenance of grouse habitat). Natural England already classes the Moors as "Unfavourable, recovering". Blanket Bog is also a key habitat for wading birds including Golden Plover

which is a listed bird for the SPA. The HRA lists “visitor pressure” as a key threat to the condition of the SAC, SPA and SSSI and was the original reason why development numbers were reduced. They have now been increased in the belief that “visitor pressure” can be mitigated by the provision of “new recreational greenspace” and “Moors Wardens”.

ACS believes that recreational greenspace provides a completely different outdoor experience to the Moors which are “nationally iconic”, offering majestic elevated views, climbing, fell running, bird watching, unique fauna & flora and a sense of freedom. Many people move close to the Moors for exactly those experiences. Also Moors access points are so numerous, distributed right around the periphery and in many cases remote, that “new wardens” would have a very limited impact, especially as many are designated footpaths.

The net result will be significantly increased “visitor pressure” over the 15 year life of the Core Strategy and further degrading of a habitat which is already classed as “unfavourable”. The proposed level of development and its distribution within the 7km radius is therefore “unsound” because the mitigation measures proposed will be largely ineffective in the context of Ilkley / Rombalds Moors.

10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.

You need to say why this change will make the proposed main modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sensitive sites within 7km of Ilkley / Rombalds Moors SAC / SPA and SSSI and requiring environmental assessment should be excluded from Core Strategy’s proposed sustainable housing provision.

**11.
Signature:**

Date:

19th January 2016

Thank you for taking the time to complete this Representation Form.