

## BCC COMMENTS ON MAIN MODIFICATIONS TO THE CORE STRATEGY DEVELOPMENT PLAN

Burley Community Council (BCC) was established in 1976 to campaign and speak up on matters affecting the residents of Burley-in-Wharfedale, Burley Woodhead and Stead. Every resident aged 18 and over living within those communities, which is within the post-code district of LS29 7 is a member of Burley Community Council.

1. MM1 BCC objects that it will only be possible to achieve the proposed development by significant encroachment on greenbelt land, a situation that is the consequence of changing the designation of Burley to Local Growth Centre (MM2). Burley does not meet the statement about sustainable locations: the addition of 700 houses in place of the 200 in the Core Strategy will increase the need for travel because of the lack of employment in the community. Although well served by rail and road services, the former in particular is at capacity at peak times; and previously allocated land cannot be prioritised because there is so little available.
2. MM2 Revision to the HRA, which upgrades Burley from Local Service Centre and Rural Area to Local Growth Centre, is incompatible with the statutory provisions in the Village Design Statement. Burley does not meet the criteria for a Local Growth Centre, especially where employment potential is concerned. (See responses on MM18, MM51 and MM52). The change in designation has also reduced the proportion of development on previous developed land from 35% to 15% (MM96 paragraph 12 below).
3. MM7 Nowhere in the Main Modifications or Core Strategy is there any recognition of the impact of extra housing arising from this designation on transport (increased pollution and parking for rail users, etc); schooling at primary, secondary and higher level; medical facilities (local GP and nearby hospital and clinical services). There is nothing in the documents to suggest that these essential matters have been considered and planned for.
4. MM9 fails to demonstrate that it reflects the policy changes to SC4 for the reasons stated above, and there is no evidence in the Core Strategy or modifications to support MM9 nor the slower scale of growth that has been deleted – MM12 .
5. MM18 BCC does not accept that there is land available in the greenbelt in sustainable locations of sufficient size to allow the provision of 700 houses and 5ha for employment (MM69), particularly since planning permission was granted in 2015 for domestic development of Burley's one remaining, ideally positioned commercial site. The strategic function of the greenbelt will be prejudiced.
6. MM23 and MM24. BCC believes that, in order to comply with the HRA policies in connection with South Pennine Moors SPA and SAC, each site proposed for development within the greenbelt collection and assessment of additional data will have to be collected and submitted to scrutiny, as stated in MM25 and MM33.
7. MM28. BCC supports the mitigation of loss implied in the proposals, but cannot envisage how there can be adequate mitigation for loss of greenbelt. Financial contribution from the developer will not do.
8. MM34. BCC supports the recommendation that "more detailed testing and traffic modelling should be undertaken to inform work on the Allocations DPD." Not only will the developments in the Wharfe Valley have significant impact, but there is evidence that congestion, whether cause by traffic volume, flooding or other reasons, leads drivers to seek alternative routes adding substantially to traffic on unsuitable roads.

9. MM51, MM52 and MM69 5Ha of land for employment in the Wharfe Valley was allocated for new employment in relation to 1600 new dwellings in the Core Strategy. With 2500 new dwellings now allocated for the same employment land, the additional dwellings will create more commuters and add to pressure on road and public transport facilities. The scope for in-fill mentioned in MM51 is minimal and insignificant in Burley.
10. MM83 The increase in housing numbers for burley are defended as part of Policy HO3, which is baseline distribution for housing requirements based solely on population. BCC acknowledges that Burley population has increased since publication of the Core Strategy in February 2014, it has not increased by c.180%. The extrapolation is unsound and cannot be used as justification.
11. MM96 See comments in 2 above concerning MM2.
12. MM127 BCC supports the overall objective to appraise, manage and reduce flood risk. The Washlands identified in the Village Design Statement are an essential part of that management (see NPPF), but in addition, the green areas around and within the village are equally essential to the control and absorption of run-off. Development of any of those sites will reduce the ability to absorb and mitigate severe inundation and will affect adjacent areas that are currently not vulnerable (MM128).
13. MM120 Burley Community Council fully supports that “plans, policies and proposals should contribute positively towards the overall enhancement of the District’s biodiversity resource”, etc, etc as set out in the whole of MM120. We do not accept that these objectives can be satisfied in Burley alongside many of the proposed developments, and certainly not compatible with the proposed development of the community as a Local Growth Centre.