

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

For Office Use only:	
Date	
Ref	

The Council are seeking comments on the Proposed Main Modifications to the Core Strategy, following the Examination in Public in March 2015. The changes are proposed by the Council to address issues of legal compliance and soundness and we can only accept representations on these matters.

Comments on the Proposed Main Modifications Schedule are invited from **Wednesday 25th November 2015** until **Wednesday 20th January 2016**.

REPRESENTATIONS MUST ONLY RELATE TO THE PROPOSED MAIN MODIFICATIONS.

You can access the Core Strategy documents online and additional copies of this form from our website: www.bradford.gov.uk/planningpolicy then 'Core Strategy Proposed Main Modifications', or you may request copies by:

- Emailing us at: planning.policy@bradford.gov.uk
- Phoning us on: (01274) 433679

Completed representation forms must be returned to Development Plans, by the deadline below, by either:

- **E-mail to:** planning.policy@bradford.gov.uk
- **Post to:** Core Strategy - Proposed Main Modifications
Development Plans Group
City of Bradford Metropolitan District Council
2nd Floor South - Jacobs Well
Nelson Street
Bradford
BD1 5RW

**ALL COMMENTS MUST BE MADE IN WRITING AND SHOULD BE RECEIVED
BY THE DEVELOPMENT PLAN GROUP AT EITHER OF THE ABOVE ADDRESSES
NO LATER THAN 4PM ON WEDNESDAY 20TH JANUARY 2016.**

Personal Details & Data Protection Act 1998

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

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PART A: PERSONAL DETAILS

* If an agent has been appointed, please complete only the Title, Name and Organisation in box 1 below and complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Mr	
First Name	[REDACTED]	
Last Name	Prior	
Job Title (where relevant to this representation)		
Organisation (where relevant to this representation)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Burley-in-Wharfedale	
Line 4	West Yorkshire	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: [REDACTED]

3. Please let us know if you wish to be notified of the following:

	Yes	No
The publication of the Inspector's Report?	x	
The adoption of the Core Strategy?	x	

Are you attaching any additional sheets / documents that relate to this representation?	Yes		No	x
	No of sheets / documents submitted :			

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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:

MM7

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 the proposed main modifications).

I have referred to the "Bradford Growth Assessment" at several points within this representation. Each of these references relates to the document located at <http://www.bradford.gov.uk/asp/bga/pdfs/Bradford%20Growth%20Assessment%20Local%20Growth%20Centres.pdf>

Change in status

- In the latest iteration of the plan, the target housing increase for Burley-in-Wharfedale multiplied from 200 to 700, an increase of 350% from the figures local neighbourhood planning has been based upon. This would represent an increase in 27% in the number of houses in the village.
- This appears to be because the village's status was changed from a *Local Service Centre* to a *Local Growth Centre*. However, there appears to have been no change in the evidence leading to this change,

and no new analysis either to justify the change or to understand the impacts if it were to take place. The analysis in the Growth Assessment at does not, in general terms, appear to justify Burley-in-Wharfedale's status as a *Local Growth Centre*. I will elaborate on this in further points.

3. Additionally, 27% growth in households does not seem to be justified by the current trends in population growth for the district, which stands at 0.3% . in the years from 2011 to 2015 (source: <http://www.bradford.gov.uk/NR/rdonlyres/28B7F26C-F672-4804-BFAA-948317D05D30/0/EmploymentLandReviewUpdate2011.pdf>). Even the previous figures of 10% increase from 2001 to 2011 upon which the targets were initially proposed would be more in line with the original target for Burley-in-Wharfedale instead of the new proposed target.

Green Belt

4. Bradford's Growth Assessment for Burley-in-Wharfedale notes that the current green belt designations work correctly in accordance with the National Planning Policy Framework.
5. Furthermore, Objective 2 of the Bradford Plan is to emphasise development of previously developed land in order to preserve Green Belt land.
6. However, other than the sites where planning permission has already been granted or is in an advanced state (e.g. Greenholme Mills, Scalebor Park, Burley Hall), none of the major proposed building sites are on previously developed land, and all but one of them (East End Allotments) fall within the Green Belt. The village has already been thoroughly in-built, which leaves almost only Green Belt development available, which is deprecated in both the NPPF and the Bradford Plan.
7. In particular, compared to other designated *Local Growth Centres*, Burley-in-Wharfedale stands out as the only centre with almost no unconstrained development land available, which again raises the question as to why the village's status was considered suitable for upgrade.
8. The SHLAAs remove Green Belt around Burley-in-Wharfedale in every direction.
9. Additionally, the SHLAA sites between Burley-in-Wharfedale and Menston lie within the settlements buffer and would create a continuous settlement.
10. The Local Development Plan does not appear to justify the need to compromise the Green Belt to the extent demanded by the housing target, and would contribute to unsustainable development sprawl the NPPF uses the Green Belt policy to avoid, and would harm the character of the Wharfe Valley.

Employment land

11. Sustainable planning calls for a mix of employment land with residential land.
12. However, existing employment land is acknowledged within the Bradford Growth Assessment as being extremely limited within Burley-in-Wharfedale, with 4.9 workers for every local job.
13. Furthermore, the only sizeable area of employment land within the village at present (Greenholme Mills) has just been replanned as a primarily residential development.
14. The only plans for additional employment by Bradford Council appear to be to encourage work/live units (see <http://www.bradford.gov.uk/NR/rdonlyres/28B7F26C-F672-4804-BFAA-948317D05D30/0/EmploymentLandReviewUpdate2011.pdf>, 6.3.8).
15. This means that either new employment land would have to be allocated (placing further strain upon

the Green Belt), or there has to be an acceptance that additional housing will generate disproportionately high commuting strain on the transport infrastructure. The Development Plan does not appear to address this.

Road infrastructure

16. Bradford's Growth Assessment for Burley-in-Wharfedale notes that transport capacity is limited.
17. This is a particular concern given the lack of employment land (please see points 10-13); given that 80% of the population already commutes out and that there is no provisioning for additional local employment, the increased population would primarily be reliant on out-commuting.
18. Road capacity is a particular concern, as the principal routes out of the village (Ilkley and Menston via the A65, Otley and Leeds via the A660) are already at capacity and subject to tailbacks throughout the week and weekend.
19. The routes into Leeds are problematic as this constitutes the key commuting destination from the village, with traffic proceeding through long tailbacks through the key chokepoints of Headingley and Kirkstall.
20. The A660 is frequently closed by groundwater flooding, blocking a key access route into and out of the village, and forcing additional traffic onto the A65.
21. Routes into Ilkley, Otley and Guiseley are problematic as these provide the key retail facilities used by the village. All of these routes are subject to long traffic delays during what would normally be considered off peak hours.
22. Increasing the retail facilities within Burley-in-Wharfedale to reduce the need for trips to neighbouring retail centres would be inhibited by the lack of employment land (see points 10-13).
23. These already over-capacity routes are shared with several other settlements planned for large housing increases, both within and without the Bradford Council boundaries (Addingham, Ilkley, Menston, Otley, Kirkstall, &c). As such, there will be an unpredictable cumulative impact exceeding each individual area of expansion.
24. The Bradford Growth Assessment particularly notes that road and bus infrastructure for Burley-in-Wharfedale is not capable of significant capacity enhancements. This does not appear to be addressed by the Development Plan in the light of 700 new houses.

Rail infrastructure

25. The railway station in Burley-in-Wharfedale provides services to Bradford, Ilkley and Leeds along the Wharfedale line. The vast majority of traffic travels to Leeds, and this would likely continue to be the case.
26. Peak services are regularly overcrowded.
27. Franchises for this line have already been awarded until 2025, and whilst there is a small increase in capacity planned by 2019, this is was assessed on the basis of current traffic.
28. The increase in capacity comprises two parts – two additional services at peak times, and six carriage trains for the busiest services. However, the station at Burley-in-Wharfedale is incapable of accommodating six carriage trains, and either the franchise award does not appear to have planned in

any required station changes.

29. These already over-capacity routes are shared with several other settlements planned for large housing increases, both within and without the Bradford Council boundaries (Addingham, Ilkley, Menston, Otley, Kirkstall, &c). As such, there will be an unpredictable cumulative impact exceeding each individual area of expansion.
30. The Bradford Growth Assessment for Burley-in-Wharfedale identifies park and ride facilities centred on the railway as the only means of significantly increasing current transport capacity for Burley-in-Wharfedale (see also points 14-21).
31. However, there is no analysis of how these facilities are to be provided. In addition to the rail capacity issues, there is a lack of land available to provide adequate parking facilities for a park and ride service.
32. The station is already surrounded by dense residential development in all directions bar the East-South-East.
33. The East-South-East site, on Hag Farm Lane, is currently identified as a potential residential site (site BU/004).
34. Access to this site is via a single track private road (Hag Farm Lane). This road joins onto the main road into the village centre (Station Road, a traffic calmed road) via a right turn from a T junction, after which it immediately passes through under a railway bridge which only allows traffic to proceed in one direction at once.
35. This setup would not be able to cope with large quantities of peak hour traffic as is, and there appears to be limited potential to significantly re-engineer this junction.
36. There appears to have been no analysis of how a park and ride facility could operate within Burley-in-Wharfedale, even though this represents the only significant transport enhancement considered possible within the Growth Assessment. This is not a sustainable growth plan.

Internal transport

37. In addition to the capacity issues of transport entering and leaving the village, there are capacity issues with the internal roads, which have been built up haphazardly upon a largely pre-motor-transport residential plan without main roads.
38. Two larger roads – Main Street and Station Road – provide access from the smaller roads to the main village access points (the station, A roads, and village centre). These roads are regularly subject to parking and traffic issues.
39. Additional traffic enters the village through Sandholme Drive, which in addition to itself being a residential road (with traffic calming due to their being a school), feeds traffic into the village via Prospect Road, which contains blind bends unsuited to the traffic involved.
40. Additional housing in the SHLAA areas would put additional pressure on each of these routes; the village has not been planned for these levels of traffic, and does not have significant capacity for these routes to be improved without detrimental impact to existing residential developments.

Education

41. Existing primary education facilities in the village could be expanded to cope with the proposed level of

additional housing.

42. The Growth Assessment concedes that secondary education is problematic, noting that *“Ilkley Grammar School, the nearest secondary school, is also specifically identified as having capacity issues towards 2018”*.
43. In fact, this assessment already appears to be out of date – additional capacity was already required for 2016.
44. There appears to be little capability to expand this (or other nearby schools) further.
45. The existing capacity is shared with several of the other settlements in the area scheduled for expansion. As such, there will be an unpredictable cumulative impact exceeding each individual area of expansion.
46. Furthermore, the Growth Assessment notes that there is a demographic shift in Burley-in-Wharfedale from over 65s to young families. This is an additional source of pressure on school places.
47. There does not appear to be any planning in the Development Plan to make provision for adequate secondary school places in Wharfedale generally.

Other underprovisioned facilities

48. The Bradford Growth Assessment includes the Post Office and Library as amenities contributing to Burley-in-Wharfedale’s suitability for growth.
49. However, the Post Office is being closed, replaced by a convenience store counter.
50. More seriously, Bradford Council are withdrawing funding for the Library.
51. Not mentioned in the Growth Assessment, but other facilities recently withdrawn include the majority of pre-school children’s activities.
52. The village would suffer (and is suffering) from the withdrawal of these facilities; population increases will intensify this unless there were to be reprovision facilities in line with the increased population.

Environment

53. The Growth Plan recognises that parts of the Burley settlement area are subject to flooding, including some of the identified SHLAAs.
54. However, this assessment has not been updated further to the Boxing Day floods 2015, in which even areas not previously considered susceptible to flooding were inundated. In particular, Rushy Beck exceeded the capacity of its culvert underneath Station Road, causing flooding (see <https://www.facebook.com/priorjohn/posts/10153350639312705>).
55. Groundwater runoff from the Moor down Moor/Station Road con
56. Additional housing would create additional run off risks to existing development, which does not appear to have been properly considered within the allocation of the SHLAAs.
57. The topography of the Wharfedale settlements, particularly Menston, Burley-in-Wharfedale and Ilkley, through which culverted water runs from the Moor to the Wharfe, appears to require a level of planning which exceeds normal good practice for development on previously undeveloped land (see Dr Duncan

Reed's independent evaluation at

<https://menstonactiongroup.files.wordpress.com/2014/12/independent-review-menston-flooding-problems.pdf>). This does not seem to have been considered within the planning of the possible housing sites.

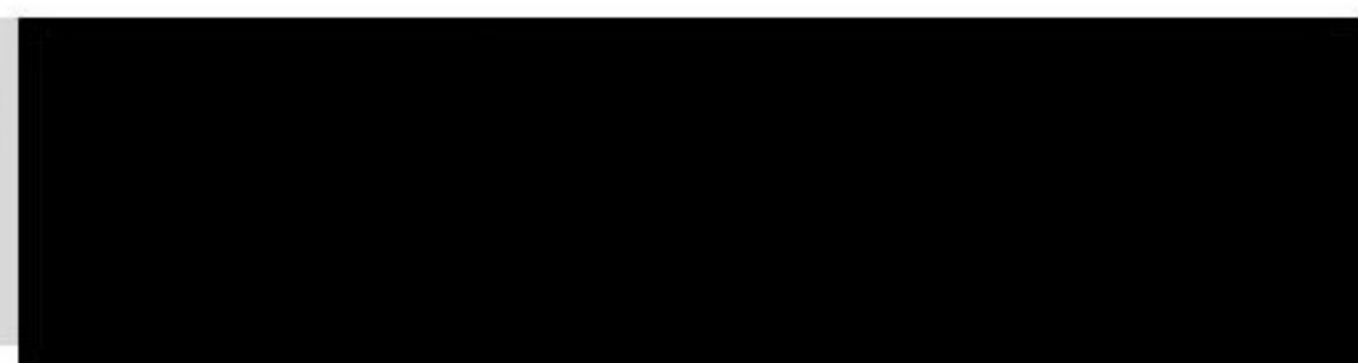
10. Please set out what changes you consider necessary to make the proposed main modification legally compliant or sound, having regard to the test you have identified at Q7 above.

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.

I have written this as a resident of Burley-in-Wharfedale. I believe that the change in status to the village as a Local Growth Centre represents unsustainable planning, which is not fully justified by Bradford Council's own analysis and evidence base. However, I do recognise the need to increase house availability in the area, particularly affordable family houses. However, I consider that the issues I have outlined above represent obstacles which need sound planning and analysis to overcome, which is not yet in place as part of the current version of the Bradford Local Development Plan.

I was not involved in the creation of Burley Parish Council's Neighbourhood Plan, but as a local resident it seems to me in its current version to represent a sound plan for dealing with a number of houses exceeding the previous target for the village, and with additional analysis, might provide a sound basis for planning against a higher target. However, many of the issues such as secondary education and transport infrastructure lie beyond the planning capabilities of the Parish Council, not only on a funding basis but also because the solutions need to take into account all of the impacted Wharfedale settlements.

11. Signature:



Date:

19/1/2016

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