

ANNEX A

FAILURE TO COMPLY WITH NPPF POLICY ON SUSTAINABILITY MAIN MODIFICATIONS 18, 51, 52 & 72

Preamble We believe that Bradford's Plan is fundamentally unsound.

Reports submitted by consultants acting on behalf of the Council have contained serious errors in data handling and data interpretation which have served to inflate housing numbers and the inconsistencies running through both the initial Plan and the Main Modifications are a direct consequence.

The figure of 41,600 homes by 2030 is not supported by population projections, household formation projections or job creation projections. A target of 30,000 is indicated by that data. We believe that to put in place a plan that sets a target in excess of the objectively assessed need for this District runs counter to the interests of its population

Why the modifications are unsound

1. The NPPF requires that development is sustainable. The Group contends that the Council are in breach of this requirement because they have failed to undertake a competent Sustainability Assessment (SA) to support the main modifications and are accordingly unable to demonstrate that their proposals will give rise to sustainable development. Our rationale for this contention is set out below.
 - In representations (No.0074 in the Council's list) on the Core Strategy Publication Draft (CSPD) BRGBPG challenged the Council's inference that all the proposed development in the Ilkley ward would be sustainable. This inference sits in the statement, frequently repeated in the CSPD, that development would take place in sustainable locations, presumably identified on the basis of the SA (February 2014) produced by Amec.
 - The group's view is that there are very few sustainable locations in Wharfedale.
 - In now increasing the allocation for Wharfedale the Council have summarily and unreasonably rejected these arguments.
 - We are also aware that the Leeds Local Plan allocates 3,500 homes to the nearby towns of Otley, Guiseley, Yeadon and Rawdon, all of which converge onto the same overcrowded road corridors and rail services as Bradford's part of Wharfedale. Beyond vague references to transport improvements which have negligible prospect of delivery the SA has given no attention to the effect upon Bradford of the Leeds proposals.
 - Development which compromises quality of life cannot, by definition, be sustainable. Bradford Council recognise this basic principle in their Landscape Character SPD, Volume 8: Wharfedale which includes this statement:

Opportunities for new development in Wharfedale are limited by the need to preserve the sharp edges of the existing settlements. The retention of the separate identity of the existing towns and villages through physical separation should be a long term aim. Additional woodland planting around the settlements will help to contain new development. Any new proposals in Wharfedale should also be assessed for their impact on the busy road network along the valley and across the valley slopes towards Airedale, to avoid adversely affecting the attractive quality of life of both residents and visitors.
 - We have reviewed the addendum of the Amec (now Amec Foster Wheeler) SA, produced to support the Main Modifications, and have paid particular attention to the SA matrix for the Wharfedale sub area (Policy WD1). We find scant reference to Landscape Character, and consider it extraordinary that the need to keep settlements separate and the inadequacy of the road network have not been reworked given the massive (56%) increase in the housing target. Indeed, the SA addendum is substantially the same as the CSPD version (February 2014), and

we suspect that much of it has been copied and pasted, even to the extent that in the text for Sustainability Objectives 4 and 6 the housing targets have not been updated. The housing numbers are fundamental to the SA process and this error seriously undermines the credibility of the document, the accuracy of its conclusions and the validity of the housing target modelling it has informed.

2. Our analysis of the WD1 matrix has also revealed flaws and inconsistencies in the scoring system as follows:

SA Objective	Amec Score	Our Analysis	Our Score
1 Energy usage	O	It is inevitable that 2,500 additional homes will increase the usage of non-renewable energy	-
2 Waste & recycling	+	Even if recycling is maximised, there must be an increase in waste from an additional 2,500 homes	-
3 Climate change reduction	?	Travel by car WILL increase emissions. More houses = more car journeys. Public transport improvements are not deliverable to the required extent, if at all	--
4 Safeguard resources :			
Air	?	As above. Air quality will be degraded	--
Water / flood risk	+	Parts of several SHLAA sites close to the river have been flooded several times in the last month. No flood alleviation measures are planned	-
Soil	M	Amec concede that loss of greenfield / green belt sites will have a negative impact, and that such loss is unavoidable, so their suggested mitigation by means of a sequential approach under Policy SC7 is fatuous	--
5 Conserve wildlife & habitats	+	If sites classified as "Amber" in the HRA are developed this score is inappropriate. If they can be avoided the score will be at best neutral. We therefore score it as "uncertain"	?
6 Maintain and enhance landscape	-	Amec's score underrates the landscape value of the sub area, and particularly Ilkley. The loss of green belt goes to the root of our submission	--
7 Enhance historic assets	++	As virtually all the likely development is on green belt outside the urban areas and distant from historic assets no effect can be anticipated	O
8 Quality housing for all	++	We agree with the SA score	++
9 Integrated transport network	+	Even if public transport services were to be improved, the distance from outlying green belt developments would increase car journeys to connect with trains, but then only if "park & ride" facilities were provided. Cycleways are only useful for recreation given the hilly terrain. Low frequency buses are unlikely to replace cars to any significant extent. As track and station capacity preclude meaningful rail service improvements, this is largely academic	O
10 Reduce		As stated above, there is negligible scope for increasing	

congestion by increasing transport choice	?	transport choice and Amec's conditional "double plus" score is meaningless. Their "uncertain" score is also unsound as clearly congestion is not going to be reduced – the proposed scale of development will increase it massively.	--
11 Quality of built environment	++	Amec concede a "minor negative" impact from green belt release, but promptly convert it to "double plus" on the pretext of using PDL first. This is disingenuous and misleading given that 82% of the potentially available sites (SHLAA 3) for Wharfedale are within the green belt, and even if ALL of the non-green belt sites were used first there would still be a 63% loss of green belt. A more appropriate score is "double negative".	--
12 Improve range of available services	+	Our earlier comments on public transport are also applicable here. Other public services are being reduced constantly as Bradford Council retrench and repatriate most services to the City centre. Yet again, Amec upgrade their score on the pretext of increased service provision. In the hope that some services might rematerialize over the 15 year trajectory we also upgrade our score to "uncertain"	?
13 Social cohesion	++	As the proposed scale of development is unwelcome to a significant proportion of the extant population the SA score is optimistic. We consider the outcome to be "uncertain"	?
14 Create cultural, leisure & recreational activities	+	The comments under 12. Above apply equally here. Ilkley's museum / art gallery has been closed, our indoor swimming pool is not fit for purpose and, if Amec had consulted Bradford's Infrastructure Plan rather than rely on the Settlement Study they would find that Wharfedale is undersupplied with sports and play facilities, and that there is no commitment to rectify the shortfall. These deficiencies have a negative impact on tourism as well as residents.	-
16 – 17 Healthcare & Education	+	If the provision of these services keeps pace with housing development, Amec's score is fair. School places are not keeping pace, but as Bradford have a statutory duty in this regard we must assume it will be fulfilled. However, it is unlikely to be fulfilled in a manner which maintains quality of life	?
18 Jobs	+	We agree with the SA score	+
19 Investment	+	We agree with the SA score	+

3. We have also examined the district-wide SA summary (Table 3.2) and find it incredible that the construction of 42,100 homes, not to mention land for employment, is predicted to have no negative impact on sustainability except in just 7 of the 247 parameters (19 SA Objectives X 13 Policies) despite the lack of infrastructure development and the significant loss of greenspace / green belt. Moreover, in only one of the seven cases is the negative impact assessed as greater than marginal.
4. From the SA as a whole, and the WD1 matrix in particular, we consider that:
 - The exercise takes a broad brush approach to Wharfedale, largely replicating the District-wide SA, and fails to demonstrate that any development in the sub area would be sustainable.
 - The scoring system is subjective and meaningless, in that no attempt is made either to weight the relative importance of the SA Objectives, or to aggregate the scores, and thus to deduce whether sustainable development is the likely outcome in any individual sub area.
 - As less than 3% of SA scores are negative the validity of the results is statistically questionable.
 - The frequent use of conditional mitigation measures, mainly of unsubstantiated deliverability, to justify uplifts in the scores is misleading and often disingenuous.
5. BRGBPB therefore consider that the Council has failed to show that their main modifications for Wharfedale will lead to sustainable development. The CSPD, as modified, thus continues to fail the

test of soundness in this respect, and in several other respects as set out in our other representations.

ANNEX B

FAILURE TO COMPLY WITH NPPF POLICY ON GREEN BELT MAIN MODIFICATIONS 17 - 18,

Why the modifications are unsound

Preamble We believe that Bradford's Plan is fundamentally unsound.

Reports submitted by consultants acting on behalf of the Council have contained serious errors in data handling and data interpretation which have served to inflate housing numbers and the inconsistencies running through both the initial Plan and the Main Modifications are a direct consequence.

The figure of 41,600 homes by 2030 is not supported by population projections, household formation projections or job creation projections. A target of 30,000 is indicated by that data. We believe that to put in place a plan that sets a target in excess of the objectively assessed need for this District runs counter to the interests of its population

1. The Group does not believe that the exceptional circumstances necessary to justify the use of green belt in order to deliver in full the longer-term housing and jobs growth have been demonstrated. The group concludes that the MM17-18 modifications are both unjustified and not in line with policies. Our reasoning is as follows
 - The MM17 reference to the *“strategic function of the green belt within the Leeds City region”* implies that some form of over-arching assessment has been carried out highlighting the relative importance to the region of the various areas of green belt, this then informing priorities and decisions around the proposed homes and employment land targets for each settlement – clearly, such an assessment has not been carried out
 - Instead, MM17 indicates that a non-strategic, *“selective review of green belt will be undertaken through the Allocations DPD having regard to the (five) purposes of the green belt in the NPPF”* – but how can this be applied consistently and even-handedly when the settlement targets have already been arrived at? The outcome will undoubtedly lead to huge disparities in the loss of green belt across settlements.
 - Therefore, whilst a proper, region-wide strategic analysis might have helped the Council to demonstrate any exceptional circumstances, the proposed piecemeal site by site review – one which is likely to lead to a disjointed result with the strategic purposes of the green belt being compromised – certainly does not
 - In lieu of any strategic evidence, the Council refers to its Growth Study as evidence of a sufficient number of green belt sites being in sustainable locations, yet the same report states *“Ilkley’s green belt performs well against the 5 NPPF purposes”*.
 - Additionally,
 - The Wharfedale sub-area Sustainability Analysis addendum also adds *“the green belt contributes positively to the landscape character of the area”* and *“that the green belt plays an important role in preventing urban sprawl and maintaining countryside character and openness”*
 - Similarly, the Landscape Character SPD, volume 8 (Wharfedale) states *“Opportunities for new development in Wharfedale are limited by the need to preserve the sharp edges of the existing settlements. The retention of the separate identity of the existing towns and villages through physical separation should be a long-term aim. Any new proposals in Wharfedale should also be assessed for their impact on the busy road network along the valley and across the valley slopes towards Airedale, to avoid adversely affecting the attractive quality of life of both residents and visitors”*

- Our separate representation, which challenges the assessments contained in the updated sustainability appraisal for Wharfedale, cast further doubt
 - Interestingly, NPPF provides but one example of exceptional circumstances for green belt usage, this being that of *“planning for larger scale developments such as new settlements or major urban extensions”*, which of course is not the proposition being made by the Council.
 - The above context needs to be viewed alongside the statement in the Planning Policy Guidance March 2014 which makes it clear that *“local planning authorities should, through their local plans, meet objectively assessed needs **unless** any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the framework as a whole or specifically – this includes policies regarding land designated as green belt, HRA and prevention of flooding”* - all of these issues directly affect Ilkley, the latter, in fact, being the subject of much local and national media coverage during November and December 2015
 - Further, as green belt is *“characterised by its openness and **permanence**”* (NPPF 79), it is unclear on what basis the estimate of 11,000 homes being required on green belt, and disproportionately applied across the District, is not judged to be of a sufficient disadvantage to merit consideration of a less ambitious District-wide new homes target – a target the effect of which is to accelerate from an average completions rate of 1,195 new homes per annum during the RUDP 10 year period to year 2014 to a new target of 2,200 homes per annum to year 2030 (a 84% increase!)
 - In making such a judgement call, it’s also not clear at what point the loss of green belt would have been regarded as serious enough to review the assessed homes and jobs targets – this does not appear to have even been considered in the rush to consign the full volume of lost green belt into a “sustainable location” categorisation
 - Interestingly, the quoted estimate of 11,000 homes on green belt at the Publication Draft stage remains the same at this Main Modifications stage despite knowing that all of Wharfedale’s additional allocation of 900 homes would be on green belt and despite the government’s recent programme (with the availability of additional funding) that seeks to incentivise the use of previously developed land and reduce the impacts on green belt
 - Furthermore, although the figure of 11,000 new homes on green belt remains the headline impact, as it was at the earlier stage, it overlooks the fact that, over and above this, green belt will inevitably be needed for
 - employment land (the equivalent of another 150-200 homes added to Ilkley’s 1,000 target)
 - a school (the rough equivalent of 100-150 homes, albeit with the potential to free up a some land from the vacated school site), and
 - rail station car park facilities (say the rough equivalent of a further 100 homes) added to the target, plus any other community/infrastructure requirements
 - Wharfedale’s green belt is also likely to become a factor in the event of any slippage in the District’s 5-year+20% buffer supply target. In such a situation developers are very likely to quickly offer up lucrative green belt as a way of helping the council to fill the gap
 - In summary, the Group considers that the above evidence demonstrates the guidance entitled “Councils must protect our precious green belt” (Gov.uk 4 October 2014) has not been applied with any serious intent. That guidance states *“councils, in considering need, should take account of any constraints such as green belt which indicate that development should be restricted and which may restrain the ability of an authority to meet its need”* – our evidence above challenges the validity of the Council’s case for exceptional circumstances now proposed in MM18.
2. We are aware that the paper entitled “Consultation on proposed changes to planning policy – December 2015” has been issued for consultation since the modifications exercise was triggered. We do not feel the potential policy changes that may arise from it, alter the detail or tenor of the representation above.

ANNEX C

FAILURE TO JUSTIFY INCREASED HOUSING TARGET FOR WHARFEDALE MAIN MODIFICATIONS 51-55

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The figure of 41,600 homes by 2030 is not supported by population projections, household formation projections or job creation projections. A target of 30,000 is indicated by that data. We believe that to put in place a plan that sets a target in excess of the objectively assessed need for this District runs counter to the interests of its population

Why the modifications are unsound

1. The above main modifications increase the Wharfedale housing allocation by 900 (an increase of 56% on the Publication Draft figures), this being the result of a) a revised approach to HRA established following interventions at the public hearing and b) the Council's extrapolation of the HRA analysis (Background paper 1, table 2, page 18 – SD/015), the latter being an analysis that had previously helped to inform the reduced figures for a number of settlements as set out in the Publication Draft. The BRGBPG maintains that the modifications made as a result are unsound. Our reasoning is as follows;
 - Although the approach to HRA has changed, the issue has not disappeared as a constraint to development
 - Ilkley has more "constrained" sites than the other settlements involved and the existing settlement actually abuts the protected area for a length of 3.2km
 - Seven Ilkley SHLAA sites are given an Amber rating in the HRA (Appendix II) November 2015
 - Apart from the HRA issues, other factors were said to have contributed to Ilkley's downward adjustment to the target from the Further Engagement Draft to the Publication Draft stage (Background paper 2: housing Part1) these being
 - That much of its capacity lies within green belt
 - The need to protect Ilkley's setting and landscape value
 - Oddly, flooding risk though was said to have only a neutral effect on Ilkley's housing numbers, though the local and national media coverage of November and December's flooding belies this
 - During the public hearing much supporting evidence was voiced by a wide range of informed, and passionate, community representatives regarding the above three issues and the impacts for infrastructure and sustainability, and of course all of that evidence was presented in the context of a 1,600 new homes target across the valley, not the 2,500 now proposed
 - Those concerns are, not surprisingly, further exaggerated by the main modifications now announced, local impacts examples being
 - As a minimum, 80% of Ilkley's new homes target of 1,000 would result in the loss of green belt (SHLAA3 report, timing of supply table, page 49)
 - 5 hectares of employment land (the equivalent of a further 150-200 homes), land for a new school (the rough equivalent of a further 100-150 homes) and a rail car park (the rough equivalent of around 100 homes) would all need to be found from green belt over and above the green belt lost in meeting the housing target
 - 83% of Burley's target would result in loss of green belt, though the Council now upgrades the term used to describe this loss of green belt as "significant"! (SHLAA3 report, timing of supply table, page 62)
 - Compared with the local percentages above;

- 11,000 homes across the District equates to an average loss of 26% of each settlement's green belt, this demonstrating the massive disparity as far as Ilkley and Wharfedale are concerned
 - Interestingly, the Council has now introduced a principal towns target of 50% of new homes being built on previously developed land – clearly an unachievable target for Ilkley itself, but helpfully the target is presented for the three principal towns collectively!
 - The main modifications increase in Wharfedale targets has been largely balanced out by comparable reductions in those for the Regional City, yet
 - We are unaware of any concerns being expressed about the impacts of the (then higher) Regional City Publication Draft housing targets, and
 - SHLAA3 now indicates the Regional City group has an additional capacity of around 1,000
 - This therefore seems to present room for manoeuvre in looking beyond the HRA dimension and aiming to ameliorate the other important impacts on green belt, landscape and flooding
 - If the Council is truly serious about minimising loss of green belt, it should utilise the evidence at its fingertips, and opportunities such as this, to do something about it by drilling down into the SHLAA green belt data, settlement by settlement, instead of making specious statements about the losses being in “sustainable locations” – a practice no doubt helped by the Sustainability Appraisal update which generously supports such assertions with a broad “green light” assessment of all of the Core Strategy impacts on Wharfedale, an assertion we vigorously challenge in a separate representation
2. We are aware, that the paper entitled “Consultation on proposed changes to planning policy – December 2015” has been issued for consultation since the modifications exercise was triggered. We do not feel the potential policy changes that may arise from it, alter the detail or tenor of the representation above.