



Dear Sirs,

## **Bradford Local Plan Reg 18 Consultation 2021**

We broadly support the points made by Andrew Wood of CPRE West Yorkshire, but make the following additional points.

### **POLICY CONFLICT**

Concerning the sites selected for development in Ilkley there is a direct conflict with the policies, for example:-

protecting the green belt

minimising travel to work

providing adequate infrastructure

creating the South Pennines Regional Park

maximising the benefit of YWCA funds to support brownfield development

all of the changes arising from the Leeds City Region and Transport for the North.

No account has been paid to the Planning White Paper which specifically protects green belt and conservation areas.

### **GREEN BELT**

We have been repeatedly reassured that Green Belt is safeguarded against development by government ministers in person, through the national press and television.

A great deal of emphasis is being placed on 'weak boundaries' to green belt. This term is meaningless and barely relevant. The boundaries are not weak. They have lasted for several decades. Using up the two indicated areas of green belt in Ben Rhydding does not in any way safeguard or make stronger the adjacent areas. It reduces the greenbelt between Burley in Wharfedale and Ben Rhydding. Describing the boundaries as weak appears to mean that the council wants to develop the sites they enclose. Describing boundaries as less durable is equally specious; they have lasted for at least 25 years and there is no case to change them. The intention of green belt is that it remains in perpetuity.

Green belt is not necessarily of high landscape value. In this case, however the landscape value of Wharfedale, including the two areas to the east of Ben Rhydding, are of particular landscape value as they provide the setting to the town and the important distant vistas, as far as Beamsley Beacon, for travellers arriving in rural Wharfedale, whether by road or train. Views of the green belt area east of Ben Rhydding from across the valley around Denton and Askwith reinforce this attractive, sylvan, rural nature.

Green belt has the purpose of preventing urban sprawl. There is precious little open countryside between Ben Rhydding and Burley in Wharfedale. Because Ilkley is constrained by the moor to the south and the Nidderdale AONB to the north, the only 'spare land for development' in Ilkley is to the east and west of the town which creates an elongated

'sausage' shape with the extremities in semi-detached ghettos at considerable distance from services and infrastructure.

In order to release green belt, there needs to be a 'net gain for bio diversity'. There is no mention of how this can be demonstrated for any of the three impacted sites in Ilkley.

The Green Belt Review (undertaken by consultants for BMDC) and potential changes/allocations should have been fully consulted upon and put before an Inspector prior to the overall composite/allocation process. As this has not happened, the Green Belt review needs public examination at this stage of the process and brought before the Inspector for examination as the next stage in the overall process, before the specific sites are scrutinised and the plan completed in 2023.

#### ALTERNATIVE GREEN BELT SITES.

It is not possible to indicate alternative green belt sites to protect Ilkley from over development. The town sits close to the North Yorkshire boundary wherein lies the Nidderdale AONB. To the South is Ilkley Moor, already an SPA and SSSI. Further northwest, but within sight of Ilkley, is the Yorkshire Dales National Park. There is no undesignated greenfield land which could be designated green belt to provide adequate extra protection to Ilkley.

#### BROWNFIELD SITES

The NPPF para 138 strongly favours the use of brownfield sites over green field and green belt despoilation. Bradford Council area is substantially endowed with brown field sites, many of which are easily accessible to the city centre. The council wants to develop the city centre as part of urban regeneration. Some brownfield sites are urban waste and leaving them in that state detracts from Bradford ever becoming a commercially thriving city. Using Wharfedale green belt sites for housing in no way supports the city centre. It merely provides costly overspill housing for Leeds.

The allocation of green belt sites for housing in preference to the allocation of brown field sites contradicts the NPPF and Bradford's own strategies for economic regeneration.

#### WYCA FUNDING

WYCA has recently announced funding of £167m to BMDC to support Brownfield development. While this initiative is welcome, it also reinforces the need to develop brownfield sites first. Making green belt available for housing development undermines this funding.

#### WINDFALL SITES

In Ilkley, approximately 25 dwellings per year are generated from windfall sites. These are as a result of using gardens, domestic demolition and re development. With the post-Covid changes to the High Street expected to have some impact another series of dwellings may be achieved via permitted development rights. These should all be taken into account.

#### SITES NOT YET AVAILABLE

When the plan lifespan was extended to 2038, consideration should have been given to sites which by that time may become available, for example, the sewage works in Ilkley.

Additional windfall sites are likely to arise from shop and office conversions to residential, which may be covered by permitted development rights. We are beginning to see

commercial to residential conversions in central Ilkley as a result of the pandemic and business closures.

## CREATION OF THE SOUTH PENNINES REGIONAL PARK

This proposed regional park with near National Park status would link the Peak District and the Yorkshire Dales National Park and the Nidderdale AONB, providing protection for the West Yorkshire Green Belt area of Wharfedale. It should be a key element of the plan for Wharfedale.

## THE IMPACT OF THE SUN LANE DECISION

The controversial decision to develop 500 houses at Sun Lane, Burley in Wharfedale, depleting the green belt, should be taken into account in any decision to develop any further green belt land between Burley and Ben Rhydding. There are impacts for the landscape, secondary school places, drainage, road use and public transport and infrastructure.

## INFRASTRUCTURE

### Employment

There are few additional jobs planned for Ilkley, which will result in new residents having to travel to the nearby cities for employment. Under normal circumstances – which may return the through A65 road is already at capacity in peak hours, with people travelling by necessity to places other than the two city centres. Trains have been at capacity prior to the pandemic and longer trains and rail infrastructure improvements will be required as passenger demand develops.

Housing should be built in close proximity to jobs in order to reduce commuting. To procure an average-priced house in Ilkley (over £400k) would need substantial savings or equity and/or the ability to pay a large mortgage. Inevitably for many people that will impose a long commute to a job that pays well enough.

### Schools

Most state schools in Ilkley are at capacity. There is a significant problem that people with more than one primary age child may find themselves offered school places at different schools and in a position where they are unable to escort two children to and from different schools at the same time. The largest cause of congestion at school time in Ilkley is the school run, fuelled by people who have no choice but to use a car if they are to get their all their children, often to different schools, on time.

The Ilkley Grammar School provides state secondary school education for children from the valley between Addingham and Menston and that is the expectation of local parents, other than those who choose the Roman Catholic education provision at Menston (Leeds City Council) or fee-paying schools. It is generally recognised that the recent rebuilding work maximised the capacity on the IGS site.

It is necessary that provision should be made a site for all the additional children from the proposed 1306 houses in Wharfedale. This could be in the Burley/Menston end of the valley and appropriate adjustments to the catchment areas.

### Health Services

It is clear to residents that these are already under severe pressure.

### Drainage and Sewerage

There has been much analysis of the raw sewerage which enters the River Wharfe from the Ilkley treatment centre in wet weather when the storm drains are at full capacity and any additional activity which exacerbates this situation should be avoided.

The sewerage system needs increased capacity and better processing arrangements before any more homes are built.

### Transport

The A65 is the only through road in this part of Wharfedale. Any increase in population will increase road traffic. Car journeys will be necessary for employment in Ilkley, shopping, schools, health appointments and leisure. People can be encouraged to cycle, but are very unlikely to do so on main roads in winter darkness. There may be a Greenway cycle route but if it is not the most direct route it is unlikely to be used for daily journeys.

The existing road underbridge at Wheatley Lane is a bottleneck. There would be a substantial increase in traffic volumes when ILH/1 and ILH3 were fully built up. The recent installation of traffic signals increased the speed of traffic raising the risk to children crossing to the Scout and Guide hall in the dark. (A pedestrian phase was requested but this was ignored by BMDC.) Even more pressure on the railway bridge is undesirable.

Within the life of this plan, there needs to be significant planned improvements in public transport, with more 'through' train services from Ilkley to beyond Leeds and Bradford. The new plans for Bradford Interchange announced on 22<sup>nd</sup> March 2021 do not improve connections for rail users of Bradford Forster Square station (Wharfedale line). The trams proposal does not come near to Ilkley. A completely redesigned series of bus services is needed, to enable people to access directly the suburbs of Leeds and Bradford for work, study and leisure purposes without having to go to the city centre and change. People from Ilkley need direct services to Bradford, Airedale Hospital, St James' Hospital Leeds, Bradford Royal Infirmary, Trinity and All Saints University and Leeds Beckett University at Headingley.

## **Specific Sites in Ilkley Ward**

### **ILH/1 Land off Wheatley Grove**

This is an attractive green belt site supporting the rural aspect of Ben Rhydding Drive.

The site access is to be via Wheatley Grove and not via the private road Ben Rhydding Drive. There is a difficult junction to access Wheatley Grove from Wheatley Lane. The junction of Wheatley Lane and Bolling Road is problematic and there is single line working at the railway bridge. There is no pedestrian crossing of either Wheatley Lane or Bolling Road. Below the railway bridge there is another poor junction with Valley Drive where traffic exiting Valley Drive has poor sight lines.

From Wheatley Lane, Wheatley Grove proceeds up a steep curving bank. This is too difficult for the gritting vehicle to negotiate, so during winter weather, Wheatley Grove can be perilous. Wheatley Grove is a residential road not designed for additional traffic, including many delivery vehicles.

The field is used for pasturing livestock but is also a wildlife haven, especially for owls. It has substantial recreational value. The very top section is within the HRA 400m zone for Ilkley Moor.

There may be a Roman road crossing the field – the route has not been defined.

The field has drainage problems. After heavy rain, water cascades off the golf course at the top of the site, through the field onto Ben Rhydding Drive and overwhelms the storm drain system.

If there is to be pedestrian access to Ben Rhydding Drive from the site, it should be noted that there are no pavements. There is a 20mph limit on Ben Rhydding Drive, but experience shows that many drivers do not observe it.

### **ILH /2 Skipton Road East**

This small site is in green belt but is in very poor condition – nothing grows on a large part of it. Access is straight onto the A65 Skipton Road and the junction would need to be carefully designed. Substantial earthworks, the remains of the former railway embankment dominate the site and would need removal to render the area habitable.

We suggest that the line of the railway embankment through this site is reserved for the Greenway en route to Addingham.

### **IL3/H Land off Coutances Way.**

This land is owned by Bradford Council and proposed development of it has been challenged repeatedly over many years because the council directly benefits from it, both in terms of capital and ongoing council tax revenue, post development. It is extremely valuable as green belt because this location, for visitors arriving by road or rail this site is the first real view of the open countryside of the Dales and Ilkley Moor since leaving the West Yorkshire cities. It provides the sense of arrival at a special place, with views towards the heather moors of the Cow and Calf rocks and across and up the dale.

The primary reason advised by Bradford Council that it has been selected for housing is that it has good transport connections. That is questionable. Bus services are poor especially early in the morning. Train services are limited to services to Leeds and Bradford. Ilkley has one main road through it. The road is prone to river flooding both east and west of the town and run-off can put the centre of Ilkley under several inches of flowing water.

#### **Drainage**

The fields are poorly drained and the bottom section floods. Despite extensive works some 20 years ago, the main storm drain down Wheatley Lane is again above capacity in wet weather and it is reported that the basements in the terraced houses can flood.

Any changes to drainage arrangements may impact the continuing landslide which has affected the Wharfedale railway line for many years and is still being monitored by rail engineers following extensive work some years ago by the contractors May Gurney. Building on the Coutances Way site may impact the natural drainage as it will increase run-off.

It should be noted that the new garden centre on Coutances Way still has drainage issues to be reconciled as a condition of its planning permission.

The site is within the 2.5km HRA boundary for both Ilkley Moor and Nidderdale AONB. The fields concerned regularly hold curlew (red list species) in good numbers. Swifts, swallows and house martins may be found in good numbers although they are diminishing elsewhere in Ilkley. In winter, migrant and native thrush species are in residence. The trees provide

roosts for many woodland margin species, including owls and great spotted and green woodpeckers. Migrant swans and geese rest in the fields. No bird box scheme will suffice to mitigate against the loss of such species. Deer, badgers and bats frequent the area.

Additionally, part of this site is already allocated to a Park and Ride car park, but it is not clear whether or when this is going ahead or how much space it will take up.

Access to the site is to be from Wheatley Lane thus increasing the number of vehicles travelling to Ilkley via Bolling Road or Valley Drive or accessing the A65.

Out of town residential developments such as Coutances Way are so far from retail facilities, services and schools that residents will need their own cars whether or not they drive to work.

#### **ILH/4 Stockeld Rd**

This small site is surrounded by housing and is in the conservation area. It is close to a Scheduled Ancient Monument, Ilkley Old Bridge, and is sufficiently near the Roman Fort site to require archaeological survey for the Roman Road leading to the ford over the river and possible remains of a vicus (Roman civil settlement).

There is some disagreement as to the boundary of this site and this needs clarifying. Does it include the church car park?

Finally, we feel strongly that NO decisions should be taken about housing until after the Pandemic is over and commercial life revives. The plan including the core strategy were conceived and established during the period before either Covid 19 or Brexit became the main economic factors in the UK. Until the pandemic crisis is over and some economic stability is regained, people will not know where they want work and live, how much they will need to travel, how much they can afford on housing or the type of housing they need.

The emphasis at present should be on ensuring progress in building all those homes which already have planning permission, in order to meet current demand.

Yours faithfully,

Helen Kidman  
Chair  
Ilkley Civic Society