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Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but 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	Stowe	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	Ilkley	
Post Code	LS29 [REDACTED]	
Telephone Number		
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 26 February 2014

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 B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	5.3	Paragraph	64	Policy	HO3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	Y	No	
4 (2). Sound	Yes		No	N
4 (3). Complies with the Duty to co-operate	Yes	Y	No	

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.

If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- There has been no attempt to assess local need
- The strategy sets out positive measures for minimising green belt releases, valuing green infrastructures, protecting habitats (Section 3 paras 103 – 116 policy SC8), minimising additional travel arising from development, boosting tourism all of which are at odds with the scale of building proposed
- Housing numbers have been reduced on account of a Habitats Regulations Assessment (HRA), but only by 38% in Ilkley whereas the combined reduction across the rest of Wharfedale is 56%
- The whole of Ilkley comes within the 2.5km habitats protection zone designated under the HRA (Section 3 para 106)
- It is unclear from the strategy therefore how the figure of 800 was calculated
- No account is taken of Ilkley’s fairly unique house building profile and the fact that there’s an ongoing process of re-development of large individual property sites and this has lead to a windfall of around 500 new homes since 2004 (such “windfalls” are excluded from any calculations
- The existing transport, education and healthcare infrastructure already struggles to deal with the existing stock of housing.
- The unique nature/topography of the town does not allow for wide scale physical improvement works to infrastructure required to support the additional properties.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Plan 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.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date: