

9 sheets

PLANNING SERVICE
RECEIVED
23 FEB 2014

17

Att 4.3.2014



Core Strategy Development Plan Document

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

Publication Draft - Representation Form

Monday 17th February until Monday 31st March 2014

This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website, www.bradford.gov.uk

For further information you can contact the Local Plan Group by:

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

Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- Part A – Persons' Details
- Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make
- Part C – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read this information to make the fullest use of this opportunity.

Please return this completed representation form to the Local Plan Group by either:

- E-mail to: ldf.consultation@bradford.gov.uk
- Post to: Local Plan Group, City of Bradford Metropolitan District Council, 2nd Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

For your representation to be 'duly made' the Council must receive it no later than 5pm on Monday 31st March 2014

2/9

PLANNING SERVICE
RECEIVED
23 FEB 2014

City of Bradford Metropolitan District Council

For Office Use only:
Date _____
Ref _____

Core Strategy Development Plan Document

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

Publication Draft - Representation Form

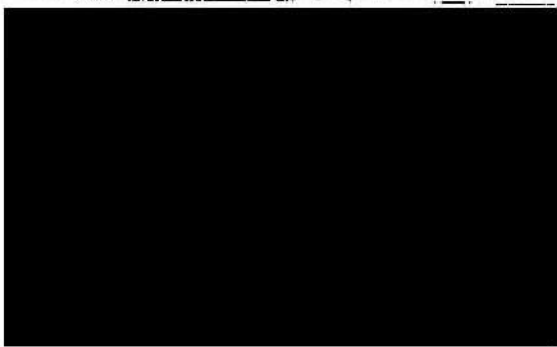
PART A: PERSONAL DETAILS

* 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	Bogaardt	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[Redacted]	
Line 2	[Redacted]	
Line 3	Ilkley	
Line 4		
Post Code	LS 29 [Redacted]	
Telephone Number	[Redacted]	
Email Address	[Redacted]	
Signature:	[Redacted]	Date: 25.02.14

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.



Objekt I

3/9
25.2.14



City of Bradford Metropolitan District Council

For Office Use only:

Commented (WBI):

Date
Ref

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

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

Section	Section 3	Paragraph	6 and 15.3	Policy	SG4
---------	-----------	-----------	------------	--------	-----

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (2). Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

6. 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.

This section of the plan refers to Ilkley as a principal town which is at best a large stretch of the reality. Other towns such as Keighley are three times the size. There are no major employment opportunities here, the area is a commuter dormitory and tourist destination. There is a town hall, but the council have removed many if not most of the administrative function (illustrated by the only time one can visit to see this plan is by appointment on Tuesdays). Many of the other characteristics of a town are also absent, there is no hospital, emergency medical facilities, cinema to name three.

There are limited facilities to travel to Bradford as the bus service has been removed. Ilkley sits on the very edge of the district which means that for employment people will have to travel on congested roads.

Local infrastructure in particular the A65 will not cope

Local Council are proposing 2000 homes at Alxaborough on this road

Recent studies have concluded that the A65 is congested and as each household is supposed make 8 vehicle journeys per day, this congestion will only increase.

4/9

City of Bradford Metropolitan District Council

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the fact you have identified at question 5 above where this relates to the Council's. (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.

The council needs to remove Ilkley from the list of principal towns and reassess what that does to the planning requirement. Provide more secondary schools and rail transport as one is already over-subscribed and the latter is full at peak times and is considered to be more environmentally friendly.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to substantiate 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?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination.
<input type="checkbox"/>	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:

[Empty box for response to question 8]

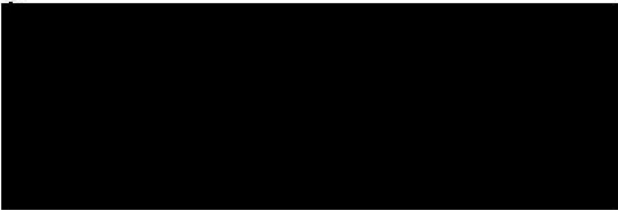
Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

8. Signature: Date:

S/9

Order 2

21. 2. 14



City of Bradford Metropolitan District Council

For Office Use only:

Date

Ref

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 84 Policy H03

4. Do you consider the Plan is:

Table with 3 rows and 4 columns: Question, Yes, No, and a sub-table for Yes/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.

As far as I can see there has been no attempt to ascertain local need. The strategy (section 3 para 103 policy SC8) sets out measures for limiting green belt erosion and protecting habitats as well as limiting traffic increase as the result of development as well as boosting tourism. None of these will be improved with further housing development. During an earlier review process (Habitats Regulations Assessment) green belt development has been reduced through Wharfedale by 56% but in Ilkley by only 38%. This at odds with the fact that the whole of Ilkley is in the 2.6Kms (1.5 mile) zone of habitats protection zone (see HRA para 103 Section 3). I am unable to find a calculation or demonstration as to how the new figure of 800 houses is arrived at. A secondary point is that as Ilkley has many large properties which are often redeveloped and in the last 10 years another 800 dwellings have been created in this way. If we consider the National Policy Framework, it is considered important and boundaries are only to be altered in exceptional circumstances. Towns are to be prevented from merging with each other, urban regeneration is to be encouraged by use of derelict brownfield sites, the countryside is to be preserved and historic towns should be protected. The proposal to build 28% of homes rising to 50% plus homes in Ilkley totalling 1600 homes (Between Menston and Ardingham) is in direct conflict with this.

Commented [W81]:

City of Bradford Metropolitan District Council

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.

Reconsider Brownfield sites: The Tesco Site is the only major Brownfield Site in Ilkley. The fashion for large supermarkets is on the wane. That area is one of terraced houses which would lend itself to sustainable and affordable homes. It is close to available public transport. Areas of Bradford and Rothley are reasonably well provided with former industrial sites which could be redeveloped, though the cost of land clearance etc will make them less attractive to developers. However there is a large burden placed on us to reuse the buildings left to our generation in a sustainable and imaginative way.

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

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:

[Empty box for outlining why participation is 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: [Signature box] Date: [Date box]

City of Bradford Metropolitan District Council

Opiew 3 25.2.14

For Office Use only:

Date	
Ref	

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

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

Section	3	Paragraph	15.3	Policy	Core Strategy
---------	---	-----------	------	--------	---------------

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	no
4 (3). Complies with the Duty to co-operate	Yes		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 seems to be no intention or plan to improve infrastructure in Wharfedale (LIP OCT 2013)

Assuming that each household will put increased demands on the facilities available, we could highlight the following

- 1) The A65 is one of the most congested roads in the area if not the UK
- 2) The primary schools are already oversubscribed and this is thought to continue to be so until the end of the Education plain2017
- 3) Ilkley Grammar school has been oversubscribed for years and a potential new site in Ben Rhydding is now considered for housing.
- 4) The trains are full and as most employment opportunities are without the town so rail travel will increase, There will be further pressure for all day parking for commuters and there is no consideration of more rolling stock
- 5) The building over green belt and increased congestion will hardly encourage the tourism that is so important to the town . If the tourism dies , so will Ilkley , it is the visitors seeing the attractions that gives Ilkley its unique charm , having reinvented itself from a Victorian spa. Once lost it is lost forever.

City of Bradford Metropolitan District Council

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.

Reconsider the issue in the round, This will show that there is too much pressure on Ilkley and the Wharfe Valley. The object is to find homes that are affordable, sustainable and close to the work place. I believe that Ilkley is less suitable than other parts of Bradford (BMDC) if these criteria are given the weight that the various reports and plans say they should have.

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?

<input checked="" type="checkbox"/>
<input type="checkbox"/>

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:

City of Bradford Metropolitan District Council

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

