



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	Mrs	
First Name	[REDACTED]	
Last Name	Skilleter	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	[REDACTED]	
Address Line 1	[REDACTED]	
Line 2		
Line 3		
Line 4	Ilkley	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 3/3/2014

#### 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.

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	64	Policy	HO3
---------	-----	-----------	----	--------	-----

**4. Do you consider the Plan is:**

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

**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.**

The plan is legally dubious as far as Ilkley is concerned since it involves the use of historically Green Belt land. The National Planning Policy Framework says this should only be done in “exceptional circumstances”. This is not an exceptional circumstance: there are loads of brownfield sites around the Bradford area which should be used up before Green Belt land is even considered. Some of the semi derelict land in the areas around the arterial roads in Bradford could be used, and some of the closed industrial buildings in Bradford, Keighley and Bingley. I know there is at least one derelict building opposite Priestthorpe School in Bingley which could be converted into housing, and plenty more in the vicinity too. If Tesco don’t use the one they have acquired in Ilkley soon that could be a compulsory purchase and used for a small development of houses. I should also add that Ilkley has seen the conversion of a considerable number of old houses into new developments, which I am informed has added around 500 new homes to the town since 2004.

Ilkley is also within a habitats protection zone designated under the HRA.

I do not believe the plan is sound at all. The National Planning Policy Framework states that one of the green belt’s purposes is “to preserve the setting and special character of historic towns”. So how would adding a huge amount of extra housing assist with this? Ilkley is not a “principal town” in the area, it’s only 3% of the area population and only a third of the population of Keighley. We have limited infrastructure: almost all the council’s local services have been withdrawn (eg cash office, registrar), the schools are already oversubscribed, there are no hospitals, it’s virtually impossible to get an appointment at the doctors and the rush hour trains are standing room only. Ilkley Grammar School had an expansion plan which was cancelled after the 2010 election and that is just with the existing population, so the new families would have no chance of getting their children in locally. This would lead

to extra journeys and therefore more traffic.

The A65 is right outside our house, so we see every day how very busy and congested Ilkley is with having no place to put a bypass. The amount of extra traffic which 800 houses would generate is eye watering and would lead to even more severe congestion, pollution and delays. This is going to discourage the tourists who currently come to Ilkley for holidays, day trips and short breaks, and cause problems for local businesses in this respect as well as disrupting their supply chain. Ilkley already has very limited parking facilities and the extra cars from the 800 new homes would make the situation even worse, causing more traffic chaos and also discouraging tourists from bringing money into the local economy.

I do not see how this ludicrous plan complies with the duty to co-operate at all. None of the issues I have mentioned above seems to have been addressed and the lumping of Ilkley in with Bradford, Keighley and Bingley seems to ignore completely the individual character of the area. It has little or no brownfield land available, the population growth is small and stable, and the infrastructure can only just support the population as it is. There is no suggestion of how it can be altered to cope with a massive influx of housing and people as the plan proposes.

**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.**

I think the plan for Ilkley is unjustified as I do not believe that all other options in the rest of the district have been explored and for the reasons outlined above, I do not see evidence that the guidelines for proper co-operation have been followed. I also think that it is not the most appropriate strategy for the area given the unique nature of Ilkley compared with the rest of the district.

I suggest therefore that the Council return to the drawing board and examines seriously other options besides the easy one of taking land out of the Green Belt. There are numerous brownfield sites in other parts of the Bradford area, and one or two small ones in Ilkley which could be used for more sympathetic development.

I do not believe the plan to be effective given the lack of infrastructure in the Ilkley area to support more housing on the proposed scale. I suggest that they speak to more local representatives from the education, health and transport sectors about the perceived impact on Ilkley and Wharfedale of these proposals.

Finally, I do not believe that the plan is consistent with national policy. It appears to take no account of the requirement to minimise the use of Green Belt land and respect natural habitats, minimise extra travel caused by new developments or the requirement to boost tourism. I feel that the plan should be modified by looking in greater detail at alternatives to building 800 new houses on Ilkley's precious green belt land. I am not a legal expert but I hope that my representation will be considered seriously.

**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"/>	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:**

**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:

3/3/2014