

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/df

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

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

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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 – Personal 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 to 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**

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Date

Ref

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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	SEALAK	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	[REDACTED]	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	ILKLEY	
Line 4	W. YORKS	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 5/3/14

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.

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	Multiple sections are referred to - see these indicated below	Paragraph	Multiple paragraphs are referred to - see these indicated below	Policy	Multiple references are made - see these indicated below
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4. Do you consider the Plan is:

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

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.

(Section 3, para 6, policy SC4)

Ilkley has been designated a "principal town" alongside Keighley and Bingley and yet

- Its population is less than 3% of the Bradford District total
- It is one-third the size of Keighley
- It is not an employment centre, more of a commuter centre (Section 2, para 52)
- It sits on the edge of the District

Most administrative council services have been removed, there's no hospital or emergency medical facilities, bus services to Bradford have been withdrawn.

(Section 5.3, para 64, policy HO3)

- 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 IIRA (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 led to a windfall of around 500 new homes since 2004 (such "windfalls" are excluded from any calculations)

More than 25% of the District's new homes will be built on green belt and for Ilkley this will be at least 55%

yet the National Planning Policy Framework says that:

- "the government attaches great importance to green belts" (NPPF para 79)
- four of the specific purposes are "to prevent towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns and; to assist in urban regeneration by encouraging the recycling of derelict and other urban land" (NPPF para 80)
- "once established, green belt boundaries should only be altered in exceptional circumstances" (NPPF para 83)

The strategy maintains that the building of 1600 new homes in Ilkley, Addingham, Burley in Wharfedale and Menston is sustainable

Yet the National Planning Policy Framework characterises sustainable development as being development that meets the needs of the present without compromising the ability of future generations to meet their own needs, central to the economic success of the country and the core principle underpinning planning. Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future.

Section 3, para 15.3 of the Core Strategy states that it is vital that there is sufficient infrastructure (e.g. transport, schools, healthcare) to support the plan

However, the Local Infrastructure Plan (LIP) dated October 2013 makes scant provision for infrastructure improvements in Wharfedale.

The road network (the A65 basically) is not capable of sustaining such a level of development particularly given that:

- Leeds Council is also planning to build 2300 new homes in Aireborough, also served by the A65
- Two studies in recent years have concluded the A65 is congested and there are very limited opportunities to increase highway capacity, the route through the centre of Ilkley is a huge hurdle.
- The LIP does not propose any investment.
- Studies have also suggested that each new home leads to an extra 8 vehicle journeys per day and yet a key aim of integrated land use and transport planning is to reduce the need to travel (Section 5.2 para 13)?
- Measures are being encouraged to increase tourism/visitor numbers to Ilkley.

The town will not be able to sustain the parking requirements of increased numbers of residents, commuters and visitors because:

- Parking is already inadequate for commuters needing day long parking.

The rail network is not capable of sustaining the extra commuters because:

- There is already overcrowding on peak trains.
- The LIP recognises the need for additional rolling stock but admits there is no committed funding for this.
- There seems little scope for increasing capacity in train length (short platforms) or in frequency (congestion at Leeds station and single track working on parts of Leeds and Bradford lines)

The schools in Ilkley and Ben Rhydding will not be able to sustain the increased demands because:

- Bradford District Education Organisation Plan shows that primary schools in the Wharfe valley are presently over-subscribed and will continue to be so until 2017.
- The need to increase the capacity of Ilkley Grammar School has long been recognised by the council, and in fact an earlier earmarked site in Ben Rhydding is now a potential site for new homes.
- The LIP recognises that the shortage of school places "could pose significant challenge to delivering growth" (LIP para 5.5.1) yet has no proposals to alleviate the situation?
- The extra demand will surely lead to schooling solutions outside the Wharfedale catchment area with extra car/bus usage and attendant impacts on environment.

The planned new homes threaten the sustainability of Ilkley's tourism and leisure interests and aims because:

- Several tracts of green belt will have been replaced by buildings.
- Extra traffic and parking problems will deter visitors.
- The town and its surrounds will lose its unique nature, its separateness and overall attractiveness.

Bradford's housing allocations for Ilkley and Wharfedale do not represent the needs and priorities of its community as envisaged in National Planning Policy Framework para 155 because:

- Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses has not taken place.
- A wide section of the community have not been proactively engaged so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those in neighbourhood plans that have been made.

The plan's proposals do not sufficiently recognise that Wharfedale is distinct from the rest of the district given that

- the District's population growth is 50% higher than Ilkley's
- Ilkley's median age is 47 years compared with 34 years for the District
- jobs are elsewhere, typically Leeds but also Bradford
- house prices average £340,000 compared with £140,000 in the rest of District
- there is very little derelict land for brownfield development, most of that taken up by delayed Tesco plans
- Bradford is ranked as the 2nd most deprived area in Yorkshire and Humberside yet Ilkley, Ben Rhydding and Burley in Wharfedale are among the least deprived areas in the country (Section 2 para 33)
- The moor, which separates the valley from the rest of the conurbation, and proximity to the Yorkshire Dales National Park and Nidderdale Area of Outstanding Natural Beauty, create a unique environment that would be compromised by the scale of the proposed development. (Section 5.2 para62 policy HO3)

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	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: 5/3/14

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PART C: EQUALITY AND DIVERSITY MONITORING FORM

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

Please place an 'X' in the appropriate boxes.