

# City of Bradford Metropolitan District Council

## Core Strategy Development Plan Document

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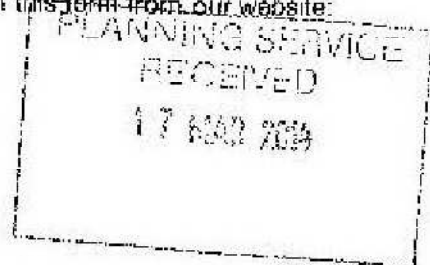
Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012

### Publication Draft - Representation Form

Monday 17<sup>th</sup> February until Monday 31<sup>st</sup> 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/ldf](http://www.bradford.gov.uk/ldf).



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

- Emailing us at: [ldf.consultation@bradford.gov.uk](mailto: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** – 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](mailto:ldf.consultation@bradford.gov.uk)
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,  
2<sup>nd</sup> 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 31<sup>st</sup> March 2014**

# City of Bradford Metropolitan District Council

PLANNING SERVICE  
RECEIVED  
17 MAR 2014

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		
Last Name	Ferguson	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3	Ilkley	
Line 4		
Post Code	LS29	
Telephone Number		
Email Address		
Signature:		Date: 06/03/2014

#### 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.

# 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	Several sections referred to – see below	Paragraph	Several sections referred to – see below	Policy	Several sections referred to – see below
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### 4. Do you consider the Plan is:

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

I strongly object to the proposal to allow the building of 800 additional dwellings in Ilkley; I believe this is unsustainable and will negatively impact the economy of Ilkley and will result in a marked deterioration of the quality of life for Ilkley residents. Further, it does not satisfy national guidelines or even those within the Core Strategy itself. My reasons for stating this are as follows:

**(Section 4.3, Figure WD1, Spatial Vision Diagram) – This states the vision to ‘Enhance the heritage value of towns... along Wharfedale corridor’, however the planned new homes threaten Ilkley’s heritage value and tourism and leisure interests:**

1. The economy of Ilkley is based on its role as a centre for visitors. This means that the general town ‘look and feel’ and surrounding scenery are an integral factor in the continued economic success of the town. It needs to retain the characteristics of a small spa town. The addition of 800 houses would strongly negatively impact this. The preservation of the Green Belt around Ilkley is not a luxury, it is a necessity in order to preserve the character of, and view from, the town and therefore its economic base. The town and its surrounds will lose its unique nature, its separateness and overall attractiveness.
2. The effect of building on the approved sites would be to promote ribbon development along the A65 corridor. The A65 approach from the East would be dominated by new housing in the area to the South above the road.

**(Section 3, para 15.3 – importance of sufficient infrastructure to support the plan)**

3. There is no strategy proposed to build up the infrastructure of the town and surrounding area – the schools, hospitals, roads and drainage systems – needed for the addition of 800 houses. According to UK government statistics, this would correspond to a population increase of at least 1,850 people with at least 955 cars.
4. There would be a demand for between 350 and 650 school places; however all the schools in the town are full.
  - i. 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 which is as far as the Education Plan goes.
  - ii. 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
  - iii. The extra demand will surely lead to schooling solutions outside the Wharfedale catchment area with extra car/bus usage and attendant impacts on environment.

**(Section 3, para 6, policy 5C4)**

5. Ilkley has been designated a “principal town” alongside Keighley and Bingley, yet

- i. Its population is less than 3% of the Bradford District total
- ii. It is one-third the size of Keighley
- iii. It is not an employment centre, more of a commuter centre
- iv. It sits on the edge of the District
- v. Most council services have been removed, there are no hospital or emergency medical facilities, and bus services to Bradford have been curtailed.

(Section 3, paras 103-116, policy SC8)

6. 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
  - i. "the government attaches great importance to green belts" (para 79)
  - ii. 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" (para 80)
  - iii. "once established, green belt boundaries should only be altered in exceptional circumstances" (para 83)

For all these reasons, I strongly urge the Council to reduce the number of additional houses to a much smaller figure corresponding to genuine infill and the use of brownfield sites.

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.

As stated above, the Council should reduce the number of additional houses to a much smaller figure corresponding to genuine infill and the use of brownfield sites.

The only suitable brownfield site within the likley area is the demolished Spooner's site acquired by Tesco but never used.

*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 type="checkbox"/> NO	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:

06/03/2014

**Core Strategy Development Plan Document (DPD) : Publication Draft**

**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.

