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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	Mrs	
First Name	[REDACTED]	
Last Name	Harris	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	Ilkley	
Line 3	[REDACTED]	
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 21 March 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	3	Paragraph	60	Policy	SC4
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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	

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.

Ilkley has been designated a “principal town” alongside Keighley and Bingley

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. In fact the plan documents are available for study at Ilkley Town Hall “By appointment only – Tuesdays”

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).

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Ilkley should not have been designated a principle town and this decision should be rescinded.

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?

X

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:

[Redacted Signature]

Date:

21 March 2014

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		No	X
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800 new homes are planned for Ilkley over the life of the plan

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)

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A more rigorous assessment of local housing need is required.

Planned housing numbers should be reduced on account of a Habitats Regulations Assessment (HRA), by 56% in Ilkley in line with the combined reduction across the rest of Wharfedale

A more rigorous assessment of local housing need is required as it is unclear how the figure of 800 was calculated.

Windfalls should be included in calculation of housing provision.

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Section	5.3	Paragraph	64	Policy	HO3
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More than 25% of the District’s new homes will be built on green belt but 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)

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The plan should take more recognition of the National Planning Policy Framework that:

“the government attaches great importance to green belts” (NPPF para 79)

“once established, green belt boundaries should only be altered in exceptional circumstances” (NPPF para 83)

Planned housing numbers to be built on greenbelt should be reduced to 25% in line with the rest of the district.

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

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Section	3	Paragraph	15.3	Policy	
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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. So:

1. **Our main road network (the A65) is not capable of sustaining such a level of development when:**
 - a) 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 being a huge hurdle. Despite this 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,
 - b) The town be unable to sustain the parking requirements of increased numbers of residents, commuters and visitors when: Parking is already inadequate for commuters needing day long parking.
2. **The rail network is incapable of sustaining the extra commuters when:**
 - a. It is already experiencing overcrowding on peak trains.
 - b. 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).

3. Our schools are unable to sustain the increased demands when:

- a. 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.
- b. 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.
- c. 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.

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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 LIP must be developed to provide sufficient infrastructure with regard to road improvements, increased school provision, increased healthcare provision and improved council services to support any planned increase in housing numbers.

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