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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	Dr	
First Name	[REDACTED]	
Last Name	Eady	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	ILKLEY	
Line 4	[REDACTED]	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: [REDACTED]

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	4	Paragraph	Several, see below	Policy	WD1/WD2
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
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.

I consider the proposal to build 800 new homes in Ilkley to be unsound for a number of reasons. Ilkley is primarily a tourist centre, not a centre for employment within BMDC. The prime reasons for any development in the town, residential or otherwise, should therefore be (see section 4.3.2) to “reinforce Ilkley’s position as one of the most desirable and sought after residential locations in the country”. It is desirable and sought after precisely because development to date has not eroded the green belt in which Ilkley sits and which makes it such a pleasant place to live and to visit. It is unsound to spoil both main approaches to the town (from Addingham and from Leeds) and two of the less busy but more scenic approaches with affordable, high density housing. It is unsound to promise improvements to infrastructure to support his housing development that, in the current economic climate, are simply unrealistic for BDMC with its overstretched finances to deliver. The proposed housing can be built at no cost to Bradford, the infrastructure to support it has to be found from Bradford’s budget. Most of us have just received our Council Tax bill for 2014/5 and the accompanying letter from the leader of the council. He states that Bradford has to cut its budget by £115 million over the next three years. Against this background and the fact that no economic upturn is occurring in West Yorkshire, how is it sound to promise infrastructure improvements which the council has no capacity to pay for in the foreseeable future? Moreover, the letter states “Services will reduce and some will stop, others will be charged for or done differently. Jobs will be lost and impact felt across the local economy”. How does the need to protect vital services sit with promises to build new schools, provide recreation and open spaces, improve transport opportunities, etc, in Wharfedale, not one of Bradford’s more deprived and therefore more needy areas? These seem to be very empty promises for a council with a huge deficit.

Why build in Ilkley anyway? New houses here are a ‘nice to have’ but they are not essential as Ilkley is not a major employment centre. It is undoubtedly true that many more people may choose to live in

Wharfedale if more housing were available but is allowing this choice an economically sound option for Bradford MBC at the present time? At times of high transport costs, affordable housing should be built closer to foci of employment. As the policy document says (page 91, section E, point 1), a stated aim is to "reduce the overall need for travel". How can this possibly be achievable by building houses further away from employment hubs? There is no shortage of brown field sites in Leeds or Bradford so why build on green belt? Affordable housing closer to the centres of employment puts less strain on transport infrastructure than building those same houses in Ilkley or Wharfedale more generally. It is also environmentally friendlier – less commuting, less pollution, reduced pressure on specialised habitats (moorland, bluebell woods, riverside). The policy says (p91, section C, point 4) that new employment land will be created in Ilkley. Where? By whom? For what type of business? What will attract these businesses to Ilkley? Would incentive be required? I am presuming this promise is based on more than the planned new Tesco supermarket, which most people in Ilkley do not want and certainly do not need. The existing business park on the A65 beyond Ashlands School hasn't exactly been a great success and has rarely been fully occupied since it was built.

Would the higher council tax from properties in Ilkley cover the costs of the upgrades required to local infrastructure and would it be earmarked for such or simply swallowed up in the overall budget and used to keep those "vital" services going? Almost certainly the latter which leaves no money to spend on the proposed upgrades to the local infrastructure of Ilkley and Wharfedale. Apart from the increased council tax yield, there doesn't seem to be any sensible argument for building in the Wharfe valley. To quote from David Green's letter once more "We will continue with plans to protect green belt by revitalising more homes". I completely agree with this statement – this is soundly based whereas building new homes on greenbelt when the city and its immediate suburbs need bringing back to life is not. There is far less need to upgrade the infrastructure in Wharfedale if the housing development occurs elsewhere. Instead of encouraging people with lower incomes to move out of our city centres, why not encourage those with bigger incomes to move back in? Bradford has some wonderful old houses which could make magnificent homes. It makes no sense to let the inner city die whilst simultaneously destroying greenbelt. If Bradford is to be a city of the future, it needs to have a vibrant heart not a necrotic one.

Bradford needs Ilkley to thrive as a major tourist centre - this is what Ilkley excels at because of its strategic location in the Wharfe valley equidistant from Leeds and Bradford. Slowly but surely spoiling Wharfedale by ribbon development along the A65 is not going to improve the attractiveness of the towns along it. The fact that they remain separate, have retained their own individual characters, and are easy to reach by road and rail, is part of what makes Wharfedale in general, and Ilkley in particular, such a pleasant place to visit. Turning Wharfedale into a suburban corridor will irreversibly destroy its beauty and its appeal. Spending any available funds on developing Ilkley as a tourist centre to generate income for BMDC makes much more sense e.g. building a new indoor pool and recreation centre (there is ample parking on the existing site and room to increase capacity).

Between 2001 and 2011 the population of Ilkley rose from 13,828 to 14,809 (census data), a rise of 7%. This was achieved without eroding the greenbelt. The expansion has already put pressure on local roads and car parking, which are busier in part because people who live in Addingham, where there is no rail

service, drive into Ilkley to catch trains to Leeds and Bradford and to shop.

One Ilkley primary school has significantly increased its capacity to cope with increased demand but the local secondary school is already under intense pressure. Which neighbouring secondary school will take the extra children (possibly over 1,000) who will live in the new homes and how far will they have to travel? How likely is it that existing policies would be reversed so that Ilkley Grammar School served only its local community? What sense would there be bussing children out of Ilkley to schools in other towns whilst transporting a similar number in from neighbouring wards? How does that make sense? According the Local Infrastructure Plan (LIP), capacity levels for local schools are not available and yet it is known that "The provision of school places in the Wharfedale sub-area is a critical infrastructure issue (page 89)." The LIP also states that "It is likely that housing sites (in Wharfedale) will be targeted by family house builders". Whilst the LIP recognises the problem, it does not promise a solution. How then can it be stated on page 90 of the Core Strategy that "new schools as required" will be provided?

Section D of the plan for Wharfedale eloquently describes how the environment will be protected and yet the first act by BMDC will be to remove greenbelt status from large stretches of land on the northern and southern approaches to Ilkley. How can we know when and where this erosion of the greenbelt will ultimately stop? Green belt boundaries should be changed only *exceptionally* (National Planning Policy Framework) as the designation is intended to *protect land around urban areas against development*. Whilst Bradford may *need* new houses, Wharfedale does not. Neither does Bradford *need* more building land - it is simply choosing to build in Wharfedale. Many alternatives exist within the metropolitan area that do not involve greenbelt. Let's exhaust those, every single one of those, first. It is most sound, both economically and environmentally to restore, regenerate and renew rather than destroy, *unless there is no viable alternative*. That is simply not the case in respect of Bradford and its Core Strategy. The plan for Wharfedale has not been adequately justified – the costs of the actions proposed to support the development in Wharfedale are not included in the Core Strategy and there are no timelines. Whilst these are addressed more globally for BMD in the LIF, without a breakdown of intended (or better earmarked) local expenditure, the feasibility of these proposals in the current economic climate cannot be assessed and must be judged as over-optimistic at best.

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.

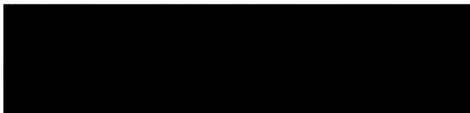
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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?

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:		Date:	23 March 2014
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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.