

PLANNING SERVICE
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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	[REDACTED]	
Last Name	Chandler	
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: 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.

City of Bradford Metropolitan District Council

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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

3.60

Policy

Sc4

4. Do you consider the Plan is:

4 (1). Legally compliant

Yes

No

4 (2). Sound

Yes

No

4 (3). Complies with the Duty to co-operate

Yes

No

X

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 description of Ilkley as a "principal town" is not justified. It is significantly smaller than other "principal towns" in the Bradford district with less than 1% of the Bradford District population.

Ilkley is not a centre for employment, it is a commuter centre. Many residents commute to Leeds or Bradford to work. There is very little industry in Ilkley and limited space for additional employment opportunities. Employment in Ilkley is primarily in shops and services serving visitors and the local community.

Ilkley does not have key facilities that should exist in a principle town. It does not have emergency medical facilities. It has no spare capacity in schools so that, even with the present population, new pupils have to travel to schools outside Ilkley. It has poor transport infrastructure, being served by a single main road, the A65, which is frequently overloaded, and no access to motorways.

Additional educational, medical and transport infrastructure would be needed, in addition to employment opportunities, before Ilkley could be correctly designated a "principal town".

Designating Ilkley a "Principal Town" just because it is the largest candidate in the Wharfe valley is not sound

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. (NB Please note that any non-compliance with the duty to cooperate 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.

Remove the "principal town" designation from Ilkley.

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:

21 March 2014

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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

5.3

Paragraph

64

Policy

HO3

4. Do you consider the Plan is:

4 (1). Legally compliant

Yes

No

4 (2). Sound

Yes

No

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.

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The figure of 300 planned new homes in Ilkley, over the lifetime of the Bradford Core Strategy, has been neither explained nor justified and is not sound.

The strategy for new homes should be based on local need but this need has not been properly assessed. Ilkley is not an employment centre and the majority of the planned 300 new homes are not needed for local employment.

A key aim of integrated land use and local planning is to reduce the need to travel. New housing above the local need will add to the numbers commuting to work elsewhere. This will increase the load on the transport infrastructure, in and around Ilkley, which is already overloaded at peak times.

Insufficient consideration has been given to the availability of land for building new homes, without the use of green belt protected land. The National Planning Policy Framework (NPPF) says the government attaches great importance to green belts and that, once established, green belt boundaries should only be altered in exceptional circumstances. The only sites for building 300 new homes in Ilkley would encroach on green belt land. A Core Strategy that requires 35% green belt land cannot be considered "sound".

About 600 new homes have already been built over the last 10 years on "windfall" sites in Ilkley. These have increased the load on the educational, health and transport infrastructure without improvements being made to that infrastructure. These additional homes should therefore be included in the decision making process when planning additional homes for Ilkley and the numbers of new homes planned for Ilkley reduced to a number that would not require significant use of green belt land.

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The number of planned new homes should be reduced and should use brown field sites wherever possible, to comply with NPPF para 40.

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9. Signature:

[Redacted Signature]

Date:

21 March 2014

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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

5.3

Paragraph

170

Policy

HO11

4. Do you consider the Plan is:

4 (1). Legally compliant

Yes

No

4 (2). Sound

Yes

No

4 (3). Complies with the Duty to co-operate

Yes

No

X

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Policy HO11 states the aim that up to 30% of new housing in Wharfedale will be "affordable". House prices in Ilkley are significantly higher than other areas covered by the Bradford Core Development Plan and any future housing offered on the open market will always attract higher than average prices, compared to identical houses built elsewhere in the Bradford MDC area, and therefore unlikely to be affordable as intended. This imbalance is due to the attractive nature of Ilkley as a centre for leisure and tourism and can only be changed by making Ilkley less attractive to house buyers. Destroying the elements of Ilkley that make it attractive is clearly not an option as it would damage the income from tourism that the Core Strategy Development plan aims to defend.

A stated aim in Policy HO11 that up to 30% of new housing in Wharfedale should be "affordable" is neither realistic nor viable and therefore this policy is not sound.

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Reduce the bias against Wharfedale in Policy HO11. A figure of 30% is not viable and should be reduced to a more realistic figure of no more than 20%.

Affordable housing is more viable in inner Bradford and Keighley areas. I suggest a figure of up to 20% should be stated for all areas.

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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

4.3

Policy

WD1

4. Do you consider the Plan is:

4 (1). Legally compliant

Yes

No

4 (2). Sound

Yes

No

4 (3). Complies with the Duty to co-operate

Yes

No

X

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The policy document states "Support the role of Ilkley Town Centre.....benefiting from excellent rail and road connectivity." This is not true. The rail services to Leeds and Bradford are already full to capacity at peak commuter times. Ilkley is served by a single main road, the A65, which is frequently overloaded, causing considerable delays to traffic. There is no access to motorways.

Increasing the number of homes in the Wharfe valley will exacerbate the transport problem.

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Delete para C2 from Sub Area Policy WD1 to remove an untrue statement.

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9. Sign

Date:

21 March 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.

