



For Office Use only:			
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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	Mr	
First Name	[REDACTED]	
Last Name	Bateson	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Ilkley	
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 24/03/14

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.

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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
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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.

The strategy gives no detail as to how the figure of 800 scheduled to be built in Ilkley has been calculated. It is noted that this represents a reduction of some 38% from the original figure following a Habitat Regulations Assessment (HRA) this compares to the combined reduction of 56% across the remainder of Wharfedale. The whole of Ilkley falls within the 2.5km habitats protection zone designated under the HRA yet the strategy does not take this into account.

The strategy provides for some 25% of the District's new homes to be built on green belt but this figure rises to 55% for Ilkley. The National Planning Framework states that the Government attaches great importance to green belts (NPPF para 79), four of the specific purposes are to prevent towns from 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).

The strategy sets out positive measures for minimising green belt releases, the value it places upon green infrastructures, the need to protect habitats (section 3 paras 103-116 policy SC8), the minimisation of additional travel arising from development, the boosting of tourism – all of which are at odds with the scale of building proposed.

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:

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.

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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	15.3	Policy	Core Strategy
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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.

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This section states it is vital that there is sufficient infrastructure to support the plan. The key aim of an integrated land use and transport plan is a reduction in the need for travel yet studies suggest that each new home results in eight vehicle journeys a day. Two studies in recent years have concluded that the A65 is congested with very limited opportunity to increase highway capacity with the route through the centre of Ilkley representing a huge hurdle. There are no proposals for any investment despite the anticipated generation of residential traffic coupled with the anticipated increased traffic resulting from the attainment of the strategy's objective of increasing tourism and visitor numbers to Ilkley.

The strategy makes no mention of plans to alleviate the problems associated with the current lack of parking spaces and traffic problems caused by on-street parking.

The lack of employment opportunities in Ilkley will require new residents to commute adding to road congestion and to the problems with overcrowding associated with peak hour rail travel. The LIP recognises the need for additional rolling stock whilst admitting there is no committed funding; there is little scope for the increase of capacity through train lengths due to platform constraints and frequency is determined by congestion at Leeds station and single track working on sections of the Leeds and Bradford lines.

The Bradford District Education Organisation Plan shows primary schools in the Wharfe Valley are presently over-subscribed and will continue to be so for the extent of the plan (to 2017). The need to increase the size of Ilkley Grammar School has long been recognised by the Council; the site previously identified for a new school has now been designated a potential site for new homes. LIP para 5.5.1 recognises the shortage of school places 'could pose a significant to delivering growth' yet there are no plans to deliver this.

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3. To which part of the Plan does this representation relate?

Section	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<input type="text"/>
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4. Do you consider the Plan is:

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

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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Section	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<input type="text"/>
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4. Do you consider the Plan is:

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

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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