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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	Ledgerwood	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2		
Line 3		
Line 4	Ilkley	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 25 <sup>th</sup> 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	Various	Paragraph		Policy	
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes		No	NO
4 (2). Sound	Yes		No	Not sound
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 proposed Bradford Council Development plan to be unsound and non-compliant when compared with the National Planning Policy Framework for the following reasons:

The proposal is non-compliant because there is conflict between interests in protecting land designated as Green Belt and the proposal to develop large chunks of prime agricultural land for the building of houses. The Core strategy fails to comply with the NPPF Framework statement that 'the Government attaches great importance to green belts' (NPPF para 79) in order to prevent one conurbation merging with another in a form of ribbon development. Should this proposed plan be adopted then Burley in Wharfedale, Ilkley and Addingham would, to all intents and purposes be joined into one long conurbation. Equally, the proposal fails to recognise the importance given to protection of the countryside from encroachment unless benefits demonstrably outweigh adverse impacts of proposed green belt development! (NPPF paras. 14 and 80) Green belts, it suggests, should only be altered in exceptional circumstances. In Ilkley 55% of the proposed growth is on Green Belt land!

The development of 800 new houses in Ilkley would have adverse effects without consideration of how the local infrastructure might also be developed to cope with the influx of new inhabitants whose demands would include:

- At least 800 new school places based upon one child per family – the Ilkley Grammar School and the local primary schools are already over-subscribed and plans to build a new secondary school in Ilkley were abandoned by the Council!

- Ilkley is not an employment centre in the District therefore the majority of its workforce commutes to Leeds, Bradford or London for this purpose. Trains are already overcrowded at peak times and neither the Council nor the Railway companies have proposed how this increased demand will be met. The lengthening of trains is not an answer since platforms would require extension and there are no plans or money to do that. The line between Guiseley and Leeds and Guiseley and Bradford is also single track so it is not possible to increase the number of trains running in peak periods. Ilkley and Ben Rhydding are already congested by people parking vehicles all day in the region of railway stations and there seems to be no consideration of how this would become worse as a result of increased population as proposed in the Local Plan.
- The A65 main road runs through the centre of Ilkley and two recent surveys suggested that it is already running at capacity with limited opportunities to increase it. The local plan makes no suggestion as to where finance would be found to address this. Studies have indicated that each new home would generate an extra 8 vehicle journeys a day that would exacerbate the problem. (Section 5.2 para 13)
- Add to this a drive to increase tourism to Ilkley and the situation becomes worse. A key aim of integrated land use and transport planning is to reduce the need for travel (Section 5.2 para 13). Lack of planned extra school places will demand that children are bussed to other areas for their education and this will dramatically increase road traffic demand during peak periods and well as pollution.
- Whilst recognising the need to build more houses in the District, since Bradford has been identified as an area of housing need, the creation of more executive homes in Ilkley will not satisfy the demands of those who cannot afford housing in Bradford itself because of low wages and /or unemployment. Even if the Council were to build 'affordable homes' on Green Belt land in Ilkley, this would not solve its problem since new home-owners would need to commute in order to find and/or attend employment. However, there seems to be no requirement for the building of affordable housing in the plan!
- A large swathe of new housing is proposed for agricultural land situated near the river and on fields that become water-logged then flooded regularly. Given the current reticence by insurance companies to insure properties located near waterways, or only at a very high premium, then this could present a little local difficulty for would be purchasers and those seeking to sell!
- The nearest Benefits Office is in Keighley and getting there is a time consuming and costly business! The national press highlighted the high number of houses in Bradford and Keighley that could be refurbished in order to meet local housing needs in communities where people live as well as suitable brown field sites that could be developed in those urban areas. In relation to the soundness of the plan, this would be a better option.

- The proposed plan seems to have ignored market trends in relation to housing needs in Ilkley. (para 158) In the past ten years around 1,000 homes have been built in Ilkley on an in-fill basis yet these figures seem not to have been taken into account. Additionally, those large housing developments situated on Clifton and Bolling Road have been abandoned presumably through a lack of demand and therefore profitability.

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.

In the above section I have outlined problems and issues as I see them that would occur if the plan to build 800 more homes in Ilkley were to occur. Most of these are problems of infrastructure or lack of real consideration of the local situation as it is. No mere changing of words will make this plan either sound in terms of increased pupil numbers, commuter demand or ability to purchase by those suffering real housing need, for example. Nor would mere changing of words make the plan legally compliant with the letter and the spirit of the National Planning Policy Framework that seeks to protect Green Belt land and make sustainable development for the better and not only in our built environment.

*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:**

25<sup>th</sup> 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.

**Please place an 'X' in the appropriate boxes.**

