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| For Office Use only: | | | |
| Date | | | |
| 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 | [REDACTED] Wallbank and Messrs. [REDACTED] Brooksbank | Isle |
| Job Title (where relevant) | | [REDACTED] |
| Organisation (where relevant) | [REDACTED] | SDS Land Ltd |
| Address Line 1 | | [REDACTED] |
| Line 2 | | [REDACTED] |
| Line 3 | | Harrogate |
| Line 4 | | [REDACTED] |
| Post Code | | HG2 [REDACTED] |
| Telephone Number | | [REDACTED] |
| Email Address | | [REDACTED] |
| Signature: | [REDACTED] | Date: 17 th 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 | | Paragraph | B | Policy | H03 |
|---------|--|-----------|----------|--------|------------|

4. Do you consider the Plan is:

| | | | | |
|---|-----|------------|----|-----------|
| 4 (1). Legally compliant | Yes | Yes | No | |
| 4 (2). Sound | Yes | | No | No |
| 4 (3). Complies with the Duty to co-operate | Yes | 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.

Strongly object to the limitation of housing in the Principal Town of Ilkley. The town will benefit economically from a sensible level of sustainable development. All new housing in Ilkley will be viable and deliverable - unlike the Principal Town of Keighley where viability seriously impedes growth. The number of 800 is far too low and even the smaller local growth centres of Queensbury and Silsden have a higher requirement of 1000.

The housing requirement based on population for Ilkley in Table H03 is 1,194 dwellings and this is substantially lowered to 800 in Table H05 - a reduction of 33%. The basis for this reduction appears to be the Growth Assessment study because of its proximity to the SPA, however (page 42) it concludes that for Ilkley "... **development should primarily look to locations to the east and west along the valley floor, where environmental pressures are lower and robust new settlement boundaries can be created**". The study indicates that 93.04 ha have been identified in the lower valley (table page 46 - which if all developed would be 2791 dwellings). **If just 50% of this area was delivered at a reduced density of 25 per hectare this would provide 1163 dwellings.**

None of the identified sites in Ilkley is in the 400 meters SPA exclusion zone. However ironically as shown on the Broadway Malyan Dwg 2013, almost a third of the **existing town is in the 400m exclusion zone**. This demonstrates the known fact that many birds breed feed and forage in a well landscaped urban area. New development of a low density and well landscaped will encourage biodiversity and bird life when compared to a potentially semi polluted field used for grazing cattle or sheep. The SPA 400-2.5km buffer where the proposed SHLL sites are located is vast - and the required land is only a fraction of a percentage of that area. Within the 2.5km SPA buffer it is more important that woodland and feeding habitat is not lost and land uses that may pollute the area are controlled.

In conclusion

- Ilkley is an important Principal Town which can provide viable sustainable housing. Development will be good for the economy of the town. The SHMA shows that new affordable housing is much needed.
- There has been sufficient sites identified in the valley floor which will not be harmful to the settlement. If just 50% ,for example, of these were used (ie 46.52ha) at a reduced density of 25/ha it would provide 1163 new homes.
- There is no justifiable reason why housing development can not take place in the 2.5km buffer unless valuable habitat is being lost - which is not the case. Well landscaped schemes with new trees and hedges provide some betterment for bird populations when compared to a field used for grazing of sheep or cattle.
- **The number of houses for Ilkley in H03 should stay in line with the population projections at around 1190.** The difference should be taken from Keighley where many sites are not currently viable.

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.

H03 should read

“

.....

The Principal Towns (6,700) Divided as follows

Ilkley 1190

Bingley 1400

Keighley 4110

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?

| | |
|-----|--|
| | No, I do not wish to participate at the oral examination |
| Yes | 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:

To fully explain the reasons why no harm is created to the bird habitat within the 400m- 2.5 km buffer from well landscaped housing development and that Ilkley will benefit from a housing requirement in line with the population growth.

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:

17th 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.

