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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. Mrs. & Miss	
First Name	[REDACTED]	
Last Name	Williamson	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	Ilkley	
Line 3	[REDACTED]	
Line 4		
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	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.

We consider the plan to be unsound as it is unclear from the strategy how the figure of 800 new homes in Ilkley was calculated. No attempt has been made to assess the local need and reflect the uniqueness of Ilkley as a town.

Only 3% of the District's population live in Ilkley yet Ilkley has been given the status of "Principle Town" The District's population growth is 50% higher than Ilkley and the demographics in Ilkley are very different, the median age being 47 as opposed to 34 for the District as a whole.

There is no plan or evidence within the strategy that identifies how employment will increase in Ilkley to support the proposed population growth for the town. Ilkley is already a "commuter" rather than an "employment" town and increasing the number of homes in Ilkley will put further stress on the transport infrastructure (the A65 and railway to Leeds/Bradford) which is already over crowded at peak times. Building homes in an area which require people to commute to work is neither green or sustainable

There are no specific proposals in the strategy for improving the capacity of the A65, or the railway, or any of other infrastructure, for example schools and medical services, which would be required to support the scale of development 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.

Ilkley's status needs to be changed from "Principle Town" to "Local Growth Centre". The strategy needs to clearly set out how employment within the town will increase and proposals for improvements to the road and rail infrastructure and essential services such as schools and medical facilities. The proposal for the number of new homes needs to be set in the context of the growth in employment and infrastructure developments and better reflect the specific needs of the town.

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:

Williamson (by email)
Williamson
Williamson

Date:

25th. 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	29	Policy	SCO7/NPPF
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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.

We consider the plan to be unsound as it relies too heavily on releases of green belt land for new housing. The strategy states the value of the green belt and sets the objective of minimising releases of green belt land (policy SC7) yet 26% of the District's proposed new housing is to be built on green belt, which rises to 55% in the case of Ilkley. This excessive use of the green belt is contrary to the NPPF which states that "the government attaches great importance to the green belt" (NPPF paragraph 79) and "once established, green belt boundaries should only be altered in exceptional circumstances" (NPPF paragraph 83). These "exceptional circumstances" have not been proved

Furthermore, NPPF paragraph 80 sets out the specific purposes of the green belt are to "prevent towns merging into each other, to safeguard the countryside from encroachment and to preserve the setting and special character of historic towns" all of which are directly relevant to the proposed development in Ilkley.

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.

To make the plan sound, it needs to be re-drafted placing much greater emphasis on the importance and the protection of the green belt, in line with both government policy and the NPPF. It must state that green belt should only be released as an absolute last resort and, if changes in the green belt boundaries are required, the plan must make the "exceptional circumstances" case, which it currently doesn't.

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.

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9. Signature:

Williamson (by email)
Williamson
Williamson

Date:

25th. March 2014

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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.

