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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	Scott	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
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: [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	Various	Paragraph	Various	Policy	SPC3
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4. Do you consider the Plan is:

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

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 National Planning Policy Framework states:

14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;

- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

- specific policies in this Framework indicate development should be restricted.⁹

For decision-

For decision-taking this means:¹⁰

- approving development proposals that accord with the development plan without delay; and

- where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

- specific policies in this Framework indicate development should be restricted.

Core Strategy DPD Publication Draft. The Policy SCP 3 (SC3) Working together does not comply with paragraphs 28, 37, 47, 48, 52–54, 77, 80, 81, 82, 111, 112, 120, 128, 158, of the National Planning Policy Framework of preserving the green belt and the best and versatile farmland it encloses.

There is no corresponding infrastructure planned to deal with the consequences for extensive new housing developments.

No new schools are planned for the increase in population. Ilkley Grammar School is already over subscribed with no post 16 education in the town for all but the high achievers. Primary school children are being asked to travel to Silsden because the schools are full.

It is recognized by both Bradford and Leeds that the A65, the only main road through the Wharfe Valley, is congested and at over capacity. There are no options for a new road. Trains are also at over capacity, more carriages cannot be added as platforms are not long enough. Parking for trains and buses is sparse and surrounding streets are full of commuter's parked cars.

The town is at saturation point and cannot be described as a Principal town with the ability to grow.

My comments in italic.

Strategic Core Policy 3 (SC3): Working Together

Planning decisions as well as plans, strategies, investment decisions and programmes should be based on:

A. Effective collaboration between the Council, adjoining local planning authorities, the District's Town and Parish Councils, partners and communities within the District Leeds City Region and beyond, particularly to:

1. Support the renewal and regeneration of urban and rural areas.

COMMENT: Ilkley is a unique thriving rural dormitory town at the edge of the Bradford District. To extend the town would mean building on green belt and creating an urban sprawl with is in conflict with the Government's policy of protecting the green belt and preventing urban sprawl. Eric Pickles, Sec of State, House of Commons meeting 17 Sept., 2012. "The green belt is an important protection against urban sprawl, providing a green lung around towns and cities." Also see NPPF Paras 80, 81 & 82.

2. Address low and high housing demand.

COMMENT: We are told by Nick Boles, Minister, that large development is required to meet the needs of migrant workers and thus a rise in our population. Daily Mail, 10 April 2013. Property in Ilkley is amongst the highest value in the country. The average household income in inner city Bradford, where housing is needed, is £20,000 per annum. The cheapest property in Ilkley is around £150,000 with rents in excess of £500.00 month.

3. Balance housing with current and future employment opportunities.

*COMMENT: Ilkley is a dormitory town, of outstanding natural beauty. Most working residents work either outside the town. Over 20% of residents are over 65. Because of the geographical position of **the town at the edge of Bradford's District and the edge of the Yorkshire Dales**, property is both expensive and desirable.*

4. Promote polycentric networks of different places with complementary roles, based on their own strengths and characteristics.

COMMENT: The strength of Ilkley and Wharfedale is it is a series of small towns and villages interspersed by special protected areas for birds and high quality farm land. Clearly attractive for large scale companies such as GVA

5. Realise the potential of Leeds City Region and ensure that benefits are spread across it.

Paragraph 52/4, No co-operation with neighbouring communities to develop new towns. The Leeds/Bradford/West Yorkshire M62 corridor is ideal from a point of view of transport links, employment opportunities and brown field sites for housing needs.

6. Achieve effective environmental management and enhancement and address climate change.

Paragraph 14 and 120 The impact of building along the Wharfe Valley will significantly affect the environment. Increased traffic adding to pollution will outway the benefits specific policies indicate development should be restricted.

7. Manage development to support economic and housing growth in the District, in particular the Leeds Bradford Corridor and Airedale Corridor.

Paragraph 37. No balance of land uses – only 5Ha employment land allocated.

Paragraph 77. No sufficient school places and no land to build new school.

Paragraph 47. No mechanism too enforce affordable housing requirement in the town. Green belt land designated for development is likely to be high value accommodation outside the scope of average wage earners. Even with Help to Buy scheme.

8. Make the best use of sustainable modes of transport, including inter-city regional road and particularly rail and water transport links.

Paragraph 120 Ignores pollution affects and of waiting traffic on A65 and congestion. Rail links to Bradford and Leeds along the A65 corridor are already overcrowded at rush hour. Platforms are too short to increase the length of the train. Bus services have been cut back and because of traffic congestion take twice as long during rush hour. Costs of transport for low paid/part time workers can be beyond endurance.

9. Ensure Landscape and environmental management and enhancement.

Paragraph 28 Does not support development and diversification or agricultural and other land based rural businesses or rural tourism/leisure development.

The land north of the railway line is nationally known for ringslip problems.

Paragraphs 80, 81 and 82. Green belt should only be used in exceptional circumstances.

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.

The above statements make it impossible for a local person to take part fully in this consultation. For this reason I feel that the plan is devised to put me at a disadvantage and therefore does not comply with ethos of involving local people.

The following statements from the NPPF have not been taken into consideration when allocating 800 houses to Ilkley and others in Wharfedale. Unless evidence can be made available to confirm that 800 houses should be built on green belt land in Ilkley to meet the housing needs of local (Ilkley) people living or working in the town, the Plan should be changed to only include necessary low cost housing. Other houses will presumably continue to be windfall properties (800 planning consents in the last 10 years. An explanation of what 'Affordable' housing is and costs should be included.

The plan should show how the calculations for each area of Wharfedale have been arrived at. Presently, spurious figures have been 'plucked' out of the air by parties who appear to have a vested interest. Building on green fields in ilkley is far more profitable than building on brown field sites in Bradford.

Ilkley should not be designated as a Principal town as it bears no resemblance to Industrial Keighley and Service center Bingley. Wharfedale is considered a tourist area of outstanding

natural beauty, attracting walkers and families to enjoy the unique spa town and protected moorland and Yorkshire Dales.

I would draw your attention to the following:

Section 4 | National Planning Policy Framework, Para 16. Decision Making

9 For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or

designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of

Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage

assets; and locations at risk of flooding or coastal erosion.

10 Unless material considerations indicate otherwise.

This is how Ilkley should be designated.

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?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	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:

I found this form and its accompanying documents very difficult to deal with. I am sure that many people will not have persevered and therefore the numbers who would have objected in a normal way will not be represented.

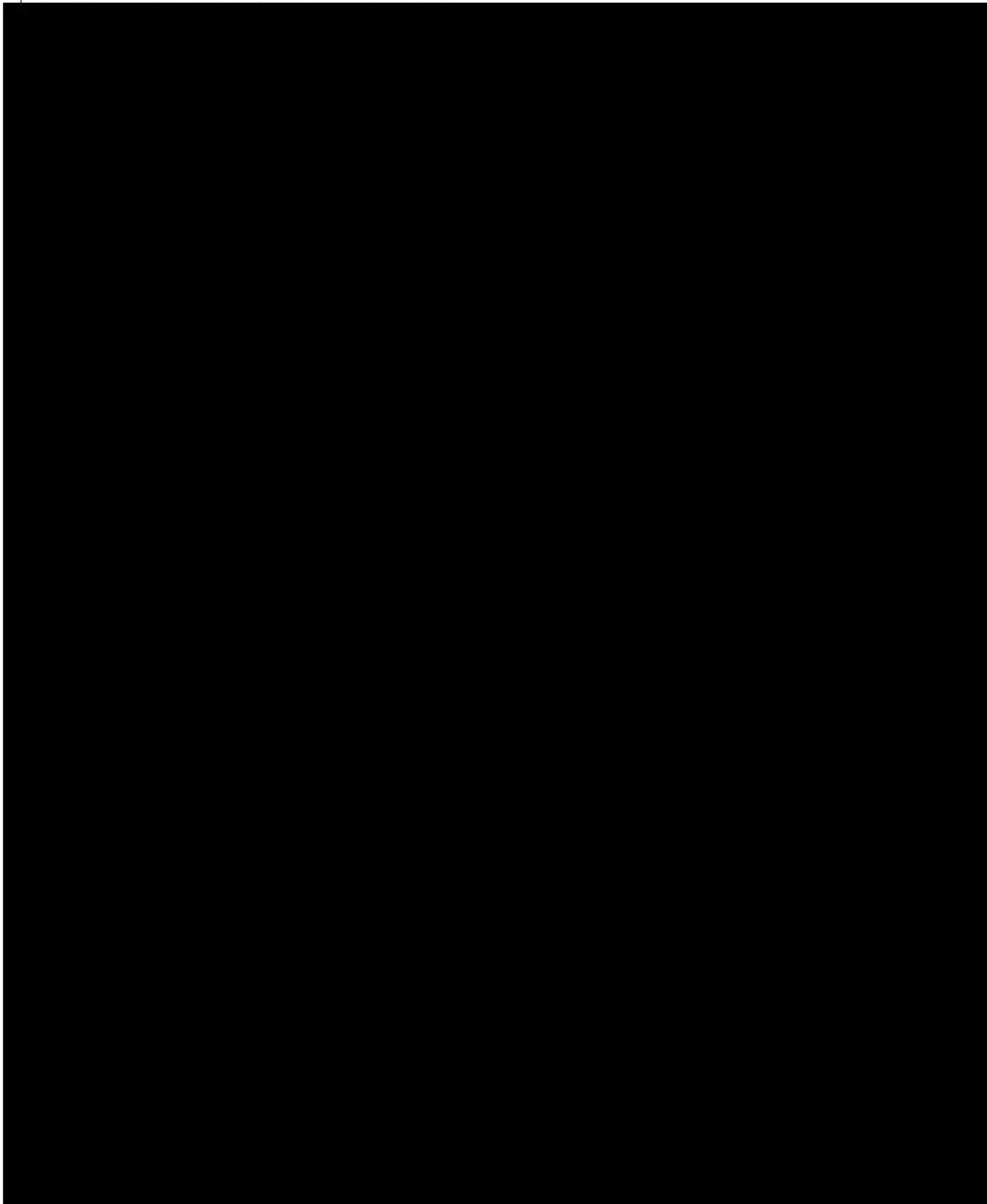
Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature: <input type="text"/>	Date: 26 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.



Yes

N/A