



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	Mrs	
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: 26 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.

For Office Use only:			
Date			
Ref			

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	3.8	Policy	SPC3
---------	---	-----------	-----	--------	------

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 plan is not sound based on the following paragraph:

3.8 Bradford District has had the fastest growing working age population of any District outside London over the last 20 years. This growth in population, households and the economy has been supported by the development of at least 42,100 new homes across the district. The majority of these new homes have been located in and around the **City of Bradford**, where emphasis has been successfully placed upon regenerating existing urban areas, the re-cycling of brownfield land and the expansion of the urban area in sustainable locations. Areas that have seen significant economic and housing growth include **Shipley town centre and the Canal Road Corridor, East Bradford, South Bradford and the City Centre**. The principal towns of **Ilkley, Keighley and Bingley** have supported housing and economic growth through **Wharfedale and Airedale** and continue to provide important services to the outlying local communities.

The reasons why the plan is not sound, based on the above paragraph:

Ilkley has been designated a principal town. What is the basis for this?

Ilkley's population is less than 3% of the total Bradford district.

It is one third the size of Keighley

The growth of population has not occurred in Ilkley as it has in other Bradford districts.

It is a town of outstanding natural beauty on the edge of the Bradford District and the edge of the Yorkshire Dales.

There are brown field sites which would serve the growing population in Bradford better than building on green belt in Ilkley and Wharfedale.

The average household income in Bradford is £20,000 the average house price in Ilkley is £300,00.

Ilkley is dormitory town with providing very little economic growth or important services.

Schools cannot provide places for the families already living in the town. Primary children are offered places in Silsden.

No provision to extend or build new schools.

No Post 16 education for students other than those gaining 5 GCSE's at graden A

Transport links are poor. Trains overcrowded as commuters travel to Bradford or Leeds.

No scope for adding carriages to these trains, as the platforms of the stations in the Wharfe Valley are too short.

No Accident and Emergency facilities in the town, the nearest is Airedale Hospital in Keighley.

Council services curtailed or closed.

Bus links with Bradford reduced.

Ilkley does not require regeneration it is a protected area for Moorland habitat.

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.

A sound calculation of how the figure of 800 houses to be built in Ilkley was arrived at should be shown in the plan.

The number of houses (800) proposed for Ilkley is based on the growth of population in Bradford not Ilkley. Ilkley's population is only 3% of the whole of the Bradford District's population. Therefore, the houses should be built in the area of need. The following extract taken from the Plan, Section 5, Paragraph 5.33 contradicts the need to build on green belt land in Ilkley. Planning permission to build on high value rural land on the edge of the district will not address the needs set out in Section 5, Paragraph 5.33.

Section 5 Paragraph 5.33

KEY OBJECTIVES

MORE HOMES - Build sufficient new homes to meet the needs of a growing population. New homes of the right type in the right location. Make better use of existing housing to meet growth needs by bringing empty homes back into use. Make sure there is the appropriate infrastructure to support housing growth.

SAFE & HEALTHY HOMES - Ensure all housing is free from the worst hazards. Make

sure homes support people to stay healthy. Adapt homes so people can stay independent. Encourage all landlords and lettings agents to provide safe and healthy homes with decent management of tenancies. Tackle the blight of empty homes.

AFFORDABLE HOMES - Ensure an adequate supply of affordable homes to buy or rent that match household incomes. Enable people to affordably heat and sustain their homes by helping them make their homes more efficient.

The plan should specify what is meant by 'affordable homes'. The district has a wide variety of house values a two bedroomed apartment in Idle, Bradford 10 is £68,000 whilst the same type of property in Ilkley would be £150,000 at least.

The proposal of 1600 new homes in Wharfedale is not sustainable. The infrastructure is not adequate for the needs of the valley now. New homes for an increasing population in a deprived city are needed near to places of possible employment development.

There is a need for new housing in Ilkley for lower income families but the plan does not explain how this would work.

The inclusion of windfall developments within the Ilkley area should be included in the plan. Over the last 10 years approximately 800 planning consents have been given for this type of property. These developments would be more sustainable as smaller developments could be encouraged and they wouldn't infringe on green belt.

Co-operation with neighbouring communities could result in building new towns. The M62 corridor has the bones of what could be a thriving employment and housing area as in the past without building an urban sprawl in an area of outstanding natural beauty. The plan does not appear to address this opportunity I can only therefore feel that it is more lucrative to developers to build on green belt. This is not the objective given for the plan.

***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
Y	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 have found the mechanism for lodging my concerns inappropriate. It has taken an inaudible amount of time to familiarise myself with the documents. I still don't know if I have presented my concerns in the correct manner. The online form is difficult to use and the attitude of the Planning Department personnel was condescending.

I do not think this procedure has been inclusive and feel that the process will have deterred many residents of Ilkley from voicing their concerns.

Most people are concerned that this town is full. The character should be preserved as much as possible or the benefit it gives the people of the whole of West Yorkshire will be lost. The infrastructure is not capable of taking the amount of building proposed and if allowed will not address the concerns about low income households having a decent place to live within short travelling distances of employment.

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.

