



Date			
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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	de Siqueira	
Job Title (where relevant)		
Organisation (where relevant)		
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:	26/03/2014
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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	3	Paragraph	60	Policy	SC4
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**4. Do you consider the Plan is:**

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

Designation of Ilkley as a principal town is unsound

The proposed Plan states; 'the main local focus will be on housing, employment, shopping, leisure, education, health, cultural, education' however,

- housing availability and sustainability is limited
- not an employment centre with limited scope for an increase in jobs.
- shortage of school places which are already at capacity with previous proposal for new grammar school cancelled.
- limited health services since closure of Britannia Hospital
- limited council administrative services.
- has a very small population percentage compared to the Bradford District total.
- much smaller than the other principal town of Keighley.
- geographically located on the edge of the Bradford district.
- is constrained by its topography and geographical boundaries
- present population is less than 3% of District total.
- there appears to be no consideration of co-operation with neighbouring authorities or communities to develop new towns or garden cities. (NPPF – paras 52/4)

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.

Redesignate Ilkley from a principal town and maintain it's existing Green belt.  
Consider housing requirement better served by development of new town or Garden city.

*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:

[Redacted Signature]

Date:

26/03/2014

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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	Paragraph	3.5	Policy	HO1
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**4. Do you consider the Plan is:**

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

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In so far as the aims in the Plan apply to Wharfedale, the proposal for 800 new houses in Ilkley and it's categorisation as a principal town, is not supported by the some of the principles stated in 'principles for achieving sustainable housing growth,'i.e ;

'Prioritising wherever possible the use and recycling of previously developed land and buildings. (para 2)

-Ilkley has limited availability in this area and therefore the use of green belt sites becomes the first option for new development. This conflicts with NPP on preserving the Green belt.

'Making the most use of land recognising it is a scarce resource' this is particularly so in Ilkley compared to other less sensitive areas.

'Phasing release of the land to ensure housing growth is co-ordinated with planned infrastructure provision'

-the existing infrastructure is already under pressure and the options for improvement are very limited.

'Making adequate provision for affordable housing'

-the options for provision of affordable housing are particularly limited in Ilkley because of the high average value of property in the area.

Sustainability means the ability to provide for present needs without jeopardising that needed for future. In this regard, the proposed Plan as it affects Ilkley is unsustainable.

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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.

Reduce the number of houses required to be built in Ilkley to a level which can be provided without release of existing Green belt land, and which does not result in an impact which adversely affects or harms the appearance, environment or quality of life of the existing town and it's long term future.

*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:

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Date:

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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	x	No	
4 (2). Sound	Yes		No	x
4 (3). Complies with the Duty to co-operate	Yes	x	No	

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The referenced proposal is unsound as;

- the figure of an additional 800 new homes for Ilkley is unreasonably high does not appear to have been objectively assessed.
- the needs of Ilkley do not seem to have been taken into account
- it will result in conflict with many of the aims set out in the proposed Plan. These include;
  - adverse pressure on the environment South Pennine Moors (Section 3,para112)
  - major impact on important Green Belt land (NPPF para 79), a sensitive and important part of Ilkley's rural character and appeal. (Section 3 paras:103-116)
  - increased potential for flooding from surface water run off from roofs, paved areas.(Section 5, para 3.54)
- The river Wharfe flooding in Ilkley and downstream due to climate change is becoming a regular problem.
- increased pressure on existing rail and road transport which are currently at capacity with no projected or approved plans for improvement.
- increased road traffic congestion on Leeds and Bradford road corridors particularly A65 with limited scope for improvement and widening due to built up nature of residential and urban route.
- increased congestion in local road traffic and town centre parking, already a major problem during tourist season. Further problems will undoubtedly deter many visitors to Ilkley.
- increased pressure on school places which are already inadequate resulting in further travel out of the District.
- increased demand on health services which have previously been reduced in Ilkley
- increased pressure on social and council services.
- no allowance appears to have been made for the redevelopment of existing sites carried out within Ilkley since 2004.

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.

Reduce the target number of 800 house to a level that does not require Green belt release and demonstrate that any additional housing will not adversely impact the environment particularly the habitats protection zone (section 3 para 6) and increase the potential risk of flooding. Provide evidence that any increase in housing in Ilkley can be acceptably accommodated by the existing school, health and infrastructure.

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9. Signature:



Date:

26/03/2014



## 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.**