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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	Mrs	
First Name	[REDACTED]	
Last Name	Hyde	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	Ilkley	
Line 3		
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 26 <sup>th</sup> 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	Various-too complicated to list	Paragraph	Re Ilkley development	Policy	
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**4. Do you consider the Plan is:**

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

**Legal compliance:**

I make a number of comments below in relation to particular paragraphs, but throughout the plan there is, in respect of Ilkley, an apparent lack of sustainability appraisal of the consequences of increased traffic, infrastructure and sheer additional numbers of people to an area which is in nature and services semi-rural. This also does not seem to be in line with the community strategy to enhance heritage values, support Ilkley as a tourist and leisure centre and be able to offer support to Burley and Menston (who have additional proposed housing of 200 each). There appears to be no plan for improved transport access.

**“Sound”**

The plan is supposed to be positively prepared, yet there is no evidence of dialogue with neighbouring authorities or even within different departments of Bradford Council- such as school and health provision.

To use the remaining pockets of rural green in an area identified within the plan as a leisure hub with heritage values does not seem to be properly supported.

**“Duty to co-operate”**

The housing proposed appears to be off the “executive” type which will not be affordable and there are no plans to address this. Within Ilkley several new small housing schemes have faltered as being unaffordable. The need within Bradford is not for this level of pricing of housing. In addition the need is geographically away from Ilkley and would involve families moving and having no adequate access to

existing schools or places of work. There are no identified improved transport plans and absolutely no facility for additional school places.

The paragraphs I consider most relevant are

( but I would note at this point that responding to the consultation is not at all user friendly)

14- The adverse impacts significantly outweigh the benefits and existing policies indicate development should be restricted.

28. There is no development identified of rural tourism, leisure developments or agricultural land and rural business development.

47. There is no mechanism to enforce the affordable housing requirement. There are indications of market stagnation in this area. Any properties built could not be afforded by those identified in need.

52/54. There is a complete lack of joined up thinking between neighbouring authorities, in particular Leeds and North Yorkshire. These will be needed as housing is also planned in the Lees bit of Menston. There are many unsold houses at present in this area. Although there is significant cross boundary flow there appears to have been no discussion regarding transport pressures and particularly school places.

77. Ilkley Grammar can not get any bigger on its existing site. It is already oversubscribed. There are no other available accessible secondary schools- the next in Bradford being in Keighley, or in Leeds Guiseley (which is also full). The same is true of secondary schools. Recent proposed changes to school transport policy and the current economic situation will already increase the demand on these places form both faith and private schools.

80/81/82 Green belt should only be used in exceptional circumstances, yet there has been very little consideration of alternatives such as brownfield land.

112. Any development must be supported by services and associated employment opportunities, yet the only site suitable for this ( and the need is already under-filled in Ilkley) on COutances Way is too be filled with housing.

158. As stated above the proposed housing will not be affordable or accessible to those with an identified need within the District . It will be purchased (if at all) by people from outside, thereby increasing the already great pressures on both housing and services within the Council area.

**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.**

I believe I have addressed this above, but would say that the green belt should be maintained and any housing development must be associated with space and provision for services such as education. 800 additional houses will alter the nature of Ilkley ( and indeed the 400 for Burley and Addingham will do to). It has been identified as a centre of tourism and leisure- this plan does not support that.

**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

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<sup>th</sup> March

## 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.**

