



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	Capt.	
First Name	[REDACTED]	
Last Name	Maden	
Job Title (where relevant)	[REDACTED]	
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: 27th 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	See below	Paragraph	See below	Policy	See below
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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	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.**

The attached written statement to Parliament (p12-14) by Nick Boles MP was delivered three weeks ago. Many of the points that he has mentioned have not been addressed in the Core Strategy Development Plan Document. As such it is felt that the proposals cannot be put forward in their present form.

"Organisation: Department for Communities and Local Government  
 Delivered on: 6 March 2014  
 First published: 6 March 2014 11:04am  
 Policy: Making the planning system work more efficiently and effectively  
 Topic: Planning and building  
 Minister: Nick Boles MP  
 Location: Parliament"

In light of the above comment the plan may not be compliant. I also consider the plan is unsound with regard to the following sections/policies:

- 1) Section 3, para 60, policy SC4
- 2) Section 5.3, para 64, policy HO3
- 3) Section 3, para 15.3, Core Strategy

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 there is sufficient brownfield land available in the Bradford district such that no green belt land releases are necessary. Without a survey into what available brownfield land is available, and the results made accessible to all communities, it is not possible to state how much green belt land may possibly be released for future development.

Please see attached pages covering my further representation.

*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:

N/A

*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:

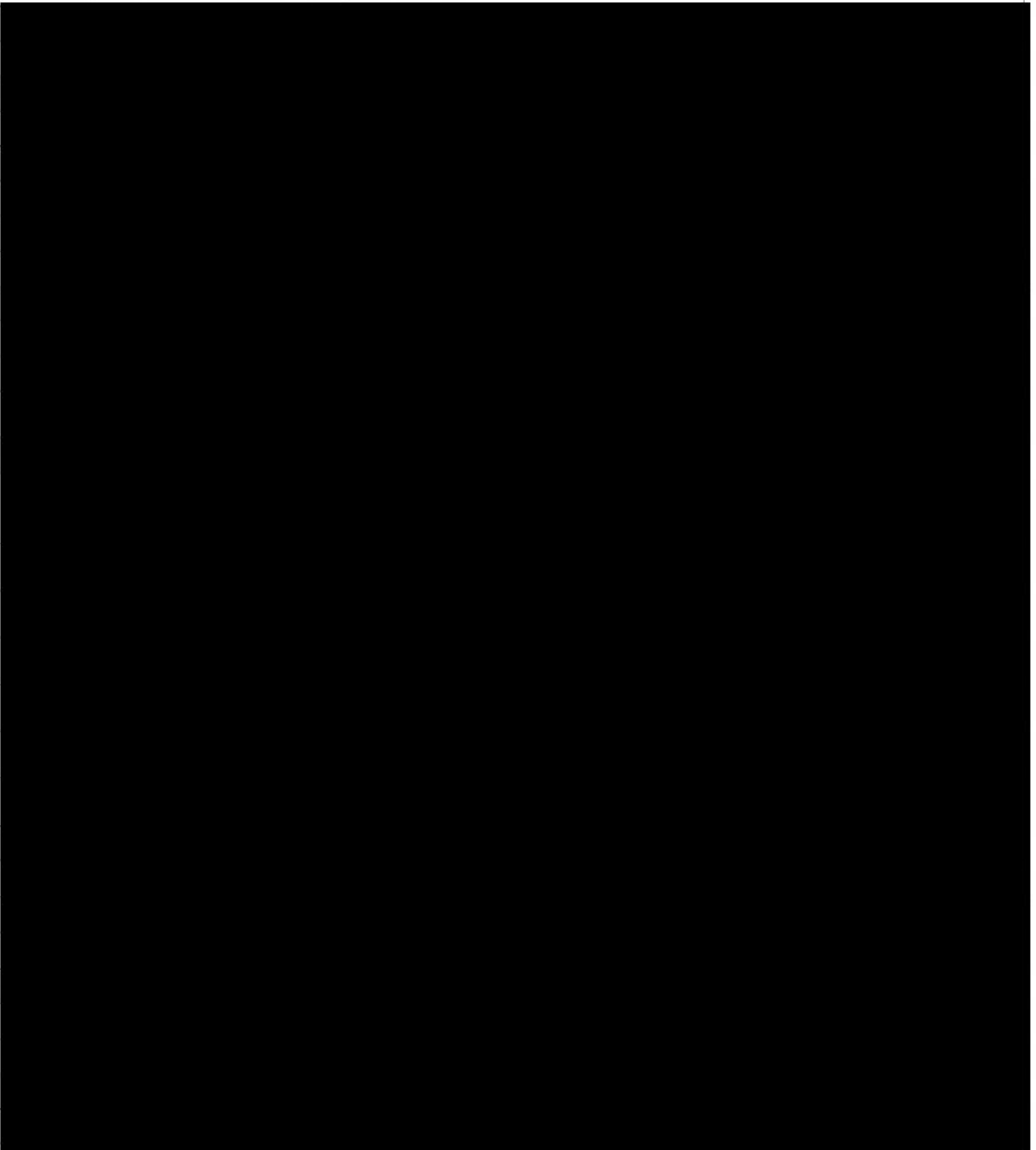
Date: 27th March 2014

## 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.**



## Section 3, para 60, policy SC4

The plan should have been prepared based on a strategy which should have objectively assessed development and infrastructure requirements, including unmet neighbouring authority requirements and sensible sustainable developments.

The plan should be considered against reasonable alternatives that are available which I do not believe has happened.

The plan should be deliverable and be consistent with national policy which it appears not to be the case (see later extracts of written statement to Parliament by Nick Boles MP 06th March 2014).

The population of Ilkley is approximately less than 3% of the Bradford District total.

It is only one third the size of Keighley but has also been designated a "principal town" the same as Keighley and Bingley.

It is not an employment centre but more of a commuter centre (section 2, para 52).

It is on the edge of the district and not an integral part of it.

A large number of council services have already been removed by the Bradford Council for example there is no hospital or emergency medical services, bus services to Bradford have been withdrawn, local services have been reduced for example the plan documents for the consultation are available for study at Ilkley Town Hall "By appointment only - Tuesdays".

## Section 5.3, para 64, policy HO3

There has been no attempt made to assess local needs bearing in mind the feelings of residents within the area who appear to be strongly against the proposed development of 800 new homes. Bradford District should consider bringing brownfield land into use and should not have to allocate green belt land on the basis of providing the maximum possible returns (profits) for landowners and developers.

The strategy sets out positive measures for minimising green belt releases, valuing green infrastructure, protecting habitat (section 3 para 103-116 policy SC8), minimising additional travel arising from development and boosting tourism - all of which are at odds with the proposed scale of development.

Housing numbers have been reduced on account of the Habitats Regulations Assessment but in Ilkley only by 38% whereas this figure is 56% in the rest of Wharfedale.

More than 25% of the District's new homes will be built on green belt though for Ilkley this will be at least 55% - there appears to be a very large disparity in these figures. The site on Coutance Way appears to be subject to light flooding when the river rises after heavy rain which now appears to be against government policy.

The National Policy Framework states that "The government attaches great importance to green belts" (NPPF para 79). "Four of the specific purposes are to prevent towns merging into one another, to assist in safeguarding the country from encroachment, to preserve the setting and special character of historic towns and to assist in urban regeneration by encouraging the recycling of derelict and other urban land" (NPPF para 80). "Once established green belt boundaries should only be altered in exceptional circumstances" (NPPF para 83).

The whole of Ilkley comes within the 2.5km habitats protection zone designated under the HRA (section 3 para 106).

It is unclear how the figure of 800 was calculated and may have been a case of plucking numbers out of the air in order to comply with requirements.

No account has been taken of Ilkley's unique house building profile and the fact that ongoing developments of large property sites has led to around 500 new homes having been built since 2004, though these developments seem to have been excluded from any calculations.

The strategy maintains that the building of 1,600 new homes in Ilkley, Addingham, Burley in Wharfedale and Menston is sustainable. The National Planning Policy Framework characterises sustainable development as being that which meets the needs of the present without compromising the ability of future generations to meet their own needs. Basically this is to ensure that all people should be able to satisfy their basic needs and enjoy a better quality of life both now and in the future.



## Section 3, para 15.3, Core Strategy

It states that it is vital that there is sufficient infrastructure such as transport, healthcare and schools to support the plan, however the Local Infrastructure Plan (LIP) dated October 2013 makes little provision for improvements for infrastructure in Wharfedale.

Examples of these omissions are the fact that Leeds Council is planning to build 2,300 new homes in Aireborough which is also served by the A65.

Two studies in recent years have concluded that the A65 is already congested and there are very limited opportunities to increase capacity. The route through Ilkley is already a huge obstacle, as is traffic control in Otley, Menston, Airborough and Horsforth (where the problem is now probably going to be discussed). Despite this the LIP does not apparently propose any investment. This appears to be totally ludicrous.

Studies have suggested that each new home leads to an extra 8 vehicle journeys per day yet a key aim of integrated land use and transport planning is to reduce the need to travel (section 5.2 para 13). Add to this that it is hoped to encourage the number of tourists and visitors and the area may well grind to a halt.

An example being will the town be able to sustain parking requirements for the increased numbers of residents, and commuters who already travel to Ilkley from villages further down the rail line in order to park and get a seat on the trains particularly at rush hour. Parking is already inadequate for commuters needing day long parking. Ilkley is apparently considering banning parking on several roads within the town for safety reasons as reported in the recent local newspaper - cars parked on both sides of a road and a hopper bus trying to move along the route.

Is the rail network capable of sustaining extra commuters and their visitors when peak time trains are already overcrowded. The LIP already recognises the need for additional rolling stock but admits there is no committed funding for this?

It seems unlikely that the number of train carriages can be increased or the number of trains increased due to the platform lengths on the routes to Leeds and Bradford being too short, congestion at the main stations of Leeds and Bradford and single track working on parts of both lines.

Schools in the area will be or are already suffering from increased demands. The Bradford District Education Organisation Plan shows that primary schools in the Wharfe valley are already over-subscribed and will continue to be so until 2017 which is as far as their plan goes.

It is already felt that there is a need to increase capacity at Ilkley Grammar School with a site being earlier identified by the Council in Ben Rhydding - this site is now being given as a potential site for new houses. Residents already find that their children now have to travel outside the area for schooling with similar numbers having to be bussed in. The extra demand will no doubt lead to solutions outside the catchment area with the obvious additional car/bus journeys. The LIP recognises that the shortage of school places could pose a significant challenge to delivering growth (LIP para 5.5.1) yet has no proposals to alleviate the problem.

At present Ilkley has a thriving tourism presence and it is probably likely that the number of proposed new builds will have a detrimental effect. Already several tracts of green belt have been replaced by buildings. The extra traffic and parking problems caused by additional houses and the increased number of cars per household may well deter visitors. As a result of this the town will lose its unique nature, its separateness due to the very nature of the green belt and its overall attractiveness.

Overall I believe that Bradford's housing allocations for Wharfedale in general and Ilkley in particular does not represent the needs and priorities of its community as envisaged in the National Planning Policy Framework para 155. This is explained as "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged so that

local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those in neighbour plans that have been made".

Further I do not believe that the plan's proposals sufficiently recognise that Wharfedale is distinct from the rest of the district given the following points:

The district's population growth is 50% higher than Ilkley's.

Ilkley's median age is 47 years compared with 34 years for the District.

Typically jobs are available in Leeds, Bradford and the other large towns not in Ilkley.

House prices average £340,000 compared with £140,000 for the rest of the district. Building the suggested number of houses would only mean more expensive housing and larger profits for developers.

At present there is little derelict land for brownfield development. Most of what is available is already sitting unused by Tesco in a proposed development that is against the wishes of the local community.

The famous Ilkley Moor that separates the Wharfe valley from the rest of the conurbation, its proximity to the Dales National Park and the Nidderdale Area of Outstanding Natural Beauty, creates a beautiful outstanding environment that would be compromised by the scale of the proposed development (section 5.2, para 62, policy HO3).

The following is a written statement to Parliament by Nick Boles MP delivered three weeks ago. Many of the points that he has mentioned have not been addressed in the Core Strategy Development Plan Document. As such it is felt that the proposals cannot be put forward in their present form.

## Local planning

Organisation: Department for Communities and Local Government

Delivered on:

6 March 2014

Page history:

Updated 6 March 2014, see all updates

Added link to the list of guidance documents cancelled by the planning practice guidance suite.

6 March 2014 4:05pm

First published.

6 March 2014 11:04am

Policy: Making the planning system work more efficiently and effectively

Topic: Planning and building

Minister: Nick Boles MP

Location: Parliament

## An accessible planning system

In October 2012, we invited Lord Taylor of Goss Moor to lead a review into the reams of planning practice guidance that we have inherited from the last administration.

My department subsequently held a consultation on the group's proposals, and in August 2013, we launched our proposed streamlined planning practice guidance in draft, consolidating 7,000 pages of complex and often repetitive documents. Today, we are launching the final version of that practice guidance through an accessible website.

We have carefully considered representations made on the draft practice guidance and feedback from hon. members and noble peers in recent Parliamentary debates.

I would particularly note that we are:

- issuing robust guidance on flood risk, making it crystal clear that councils need to consider the strict tests set out in national policy, and where these are not met, new development on flood risk sites should not be allowed
- re-affirming green Belt protection, noting that unmet housing need is unlikely to outweigh harm to the green Belt and other harm to constitute very special circumstances justifying inappropriate development
- making clear that local plans can pass the test of soundness where authorities have not been able to identify land for growth in years 11 to 15 of their local plan, which often can be the most challenging part for a local authority

- making clear that windfalls can be counted over the whole local plan period
- explaining how student housing, housing for older people and the re-use of empty homes can be included when assessing housing need
- ensuring that infrastructure is provided to support new development, and noting how infrastructure constraints should be considered when assessing suitability of sites
- stressing the importance of bringing brownfield land into use and made clear that authorities do not have to allocate sites on the basis of providing the maximum possible return for landowners and developers
- noting that councils should also be able to consider the delivery record (or lack of) of developers or landowners, including a history of unimplemented permissions; this will also serve to encourage developers to deliver on their planning permissions
- incorporating the guidance on renewable energy (including heritage and amenity) published during last summer and making it clearer in relation to solar farms, that visual impact is a particular factor for consideration
- allowing past over-supply of housing to be taken into account when assessing housing needs
- on the 5 year supply of sites, confirming that assessments are not automatically outdated by new household projections
- clarifying when councils can consider refusing permission on the grounds of prematurity in relation to draft plans
- encouraging joint working between local authorities, but clarifying that the duty to co-operate is not a duty to accept; we have considered and rejected the proposals of HM opposition to allow councils to undermine green Belt protection and dump development on their neighbours' doorstep

We will today also cancel the previous planning practice guidance documents being replaced by the new guidance; a list has been placed in the Library. The planning practice guidance will be updated as needed and users can sign up for email alerts on any changes, or view these revisions directly on the site. The online resource is at: [planningguidance.planningportal.gov.uk](http://planningguidance.planningportal.gov.uk)

## Encouraging re-use of empty and under-used buildings

In August 2013, my department published a consultation paper on a further set of greater flexibilities for change of use. Further reforms will save time and money for applicants and councils, encourage the re-use of empty and under-used buildings and further support brownfield regeneration while ensuring regard to potential flood risk.

## New homes: retail to residential change of use

Outside key shopping areas, such as town centres, we want under-used shops to be brought back into productive use to help breathe new life into areas that are declining due to changing shopping habits. This will not only provide more homes, but increase the resident population near town centres, thereby increasing footfall and supporting the main high street. Reforms will allow change of use from shops (A1) and financial and professional services (A2) to houses (C3). This change of use will not apply to land protected by Article 1(5) of the General Permitted Development Order (National Parks, the Broads, areas of outstanding natural beauty, conservations areas, World Heritage Sites).

We recognise the importance of retaining adequate provision of services that are essential to the local community such as post offices. Consideration will be given to the impact on local services when considering the potential loss of a particular shop. The onus will be on the local planning authority to establish that the proposal would have a detrimental impact on the sustainability of a key shopping area or on local services should they wish to refuse the conversion. When considering the effect on local

services they will have to take into account whether there is reasonable prospect of the premises being occupied by another retailer. Local planning authorities will need to have robust evidence base to justify any decision not to permit change of use using these prior approval tests.

In addition, to increase access to retail banking and to encourage new entrants, shops (A1) will be able to change to banks, building societies, credit unions and friendly societies, within the A2 use class. This does not cover betting shops or payday loan shops.

## New homes: agricultural to residential change of use

These reforms will make better use of redundant or under-used agricultural buildings, increasing rural housing without building on the countryside. Up to 450 square metres of agricultural buildings on a farm will be able to change to provide a maximum of 3 houses.

We recognise the importance to the public of safeguarding environmentally protected areas, so this change of use will not apply in Article 1(5) land, for example national parks or areas of outstanding natural beauty. However, we expect national parks and other local planning authorities to take a positive and proactive approach to sustainable development, balancing the protection of the landscape with the social and economic wellbeing of the area. National parks and other protected areas are living communities whose young people and families need access to housing if their communities are to grow and prosper. I would note that a prior approval process will allow for flooding issues to be addressed.

## Change of use: extending access to education

We also propose to extend the existing permitted development rights for change of use to state-funded schools to additionally cover registered nurseries. Agricultural buildings up to 500 square metres will also be able to change to state-funded schools and registered nurseries.

I believe that these are a practical and reasonable set of changes that will help facilitate locally-led development, promote brownfield regeneration and promote badly-needed new housing at no cost to the taxpayer. The reforms complement both the coalition government's decentralisation agenda and our long-term economic plan.

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6 March 2014 4:05pm

Added link to the list of guidance documents cancelled by the planning practice guidance suite.  
6 March 2014 11:04am First published.

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Policy: Making the planning system work more efficiently and effectively

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