

# City of Bradford Metropolitan District Council

PLANNING SERVICE  
RECEIVED  
27 MAR 2014

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	Watson	
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: 25/3/2014

#### 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.

# City of Bradford Metropolitan District Council

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	5.3	Paragraph	64	Policy	HO3
---------	-----	-----------	----	--------	-----

4. Do you consider the Plan is:

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

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 policy HO3 requires the building of 1,600 new dwellings in Wharfedale including 800 in Ilkley. These numbers in policy HO3 are not sustainable for the following reasons:-

In section 4.3 E1 the policy calls for development to maximise the use of non car modes of transport and reduce the overall need to travel. In the Local Infrastructure Plan (LIP) October 2013 paragraph 4.3.6 has a strategic objective which calls for development to be in locations that reduce the need to travel and minimise the need to travel by car. Paragraph 5.2.2 also identifies problematic congestion on routes used by Ilkley residents before any additional dwellings are built in Ilkley. We already have congested roads in/out of Wharfedale and overcrowding on commuter trains (LIP 5.5.1) and it is admitted that Ilkley is not a major town for employment growth. The policy calls for less car journeys and reduced need for travel. LIP 5.5.4 admits that the dwelling growth will result in additional trip generation and implies that this is in all forms of transport. This is at odds with the policy objectives outlined in 4.3 E1. So housing development should be in sustainable locations where major employment growth is forecast and this is not Wharfedale or Ilkley. Accordingly housing allocations in HO3 are unsound and dwelling development should not be in commuter towns like Ilkley, Addingham and Burley.

LIP Section 5.5.6 suggests that that there are no major transport issues in Wharfedale. At present the rail links to Leeds in particular are overcrowded on the commuter trains and there is limited prospect of additional capacity due to platform sizes, Leeds station issues and single line issues. A key arterial route is the A65 – the LIP admits this already has severe overcrowding and it fails to take into account (as required) the Leeds Council Local Plan which foresees 2,300 new dwellings in Aireborough which will severely impact the A65 and so make existing congestion even worse. As studies have confirmed that each new dwelling leads to an additional 8 car journeys per day there is a clear problem at the heart of

the policy. The policy WD1 aims to reduce the overall need for travel but unless the dwellings in policy HO3 are relocated to where the jobs are then the need for both car and public transport journeys will increase substantially on a network which is already overloaded. This is not sustainable or deliverable.

Additionally there is a £752 million plus funding gap for infrastructure improvements to enable the local plan to be delivered. Given the relentless focus on public expenditure it is highly unlikely that this funding gap will be closed any time soon. WD1 paragraph B indicates that additional schools will be required (local schools are already full) and that there are deficiencies in open and recreational space in Ilkley. No money has been allocated to this at all in the Local Plan and accordingly the plan is unsound. It is not sustainable as it envisages using up green belt land for housing in Ilkley when there is already a deficiency in open space. Accordingly policy HO3 should be revisited and made more deliverable/sustainable by moving proposed dwelling development away from commuter towns (like those in Wharfedale) and in to the major centres of employment like Bradford so that more people can walk to work which would enable policy in LIP 4.3.6 to be met.

Policy HO3 can only be delivered by policy SC7 which envisages significant green belt releases to deliver housing growth allocations in policy HO3. The policy HO3 (and SC7) is unsound as it fails to take into account the latest guidance regarding the National Planning Policy Framework (NPPF). It fails to recognise the importance that the Government attaches to Green Belt land (NPPF Section 9 para 79). In particular with regard to Ilkley (which is a historic Victorian Spa Town) and with a local moor made well-known by the famous song the Green Belt should preserve the setting and special character of historic towns (NPPF Section 9 para 80). NPPF section 9 para 89 states that Local Authorities should regard the construction of new buildings as inappropriate for the Green Belt. The overall policy HO3 combined with SC7 envisages that 11,000 new dwellings should come from release of green belt land (Local Plan 5.3.30). This is unsound, not sustainable and not legally compliant with the NPPF.

It is totally unclear in policy HO3 where the legal duty to co-operate has been complied with. There has been no public consultation locally to determine what local residents feel is appropriate for the community. Due to this there has been no account taken of windfall development (as is now required) which in a Victorian town like Ilkley is a significant contributor to additional dwellings being made available over the timeframe of the Local Plan. Accordingly the number of 800 dwellings for Ilkley has not been agreed locally and policy HO3 does not comply with the legal duty to co-operate.



# City of Bradford Metropolitan District Council

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 Policy HO3 should be revisited and proposed dwellings relocated from commuter towns like Ilkley, Burley and Addingham and into areas of major employment growth like Bradford centre. It is suggested that the 800 dwellings planned for Ilkley should be reduced to 75.

Green Belt changes should be prohibited in Ilkley to keep open space and policy HO3 should be amended to minimise the impact on transportation through lower housing allocations across Wharfedale.

*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

Date

25/3/2014

**Core Strategy Development Plan Document (DPD) : Publication Draft**

**PART C: EQUALITY AND DIVERSITY MONITORING FORM**

