



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	Fox	
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:	28.03.14
------------	------------	-------	----------

#### 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	Sect. 4.3, Sect. 5.2	Paragraph	62,64,	Policy	sub area policy, Wharfedale,HO3
---------	-------------------------	-----------	--------	--------	------------------------------------

**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (2). Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

**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.**

I believe the plan is not legally compliant for a number of reasons. Firstly the proposal to build 800 homes in Ilkley takes no account of how the infrastructure would be able to absorb the increase in population. This would have a profound effect on the already overloaded transport system. Currently trains between Ilkley and Leeds and to a lesser extent Bradford are over-crowded at peak times. In addition the main roads and in particular the A65 struggle to cope with the amount of traffic, with long hold ups both in the centre of Ilkley and at Ben Rhydding. Being the main route to both the Dales and the Lakes exacerbates the problem at week-ends and bank holidays. This does not appear to have been taken into account in the LDF.(Sect E, P91 states that Ilkley has "excellent rail and road connections to Bradford and Leeds).

Neither has account been taken of the impact on other sections of the infrastructure. For example section IL/013 014 Proposes building up to 600 homes on the edge of a designated flood plain. This is likely to have a catastrophic effect resulting in the River Wharfe flooding to a greater extent than is already the case. The area identified for building currently acts as drainage run off for higher land and for Ilkley Moor itself. Increased housing to the level planned would greatly exacerbate this problem as the drainage system in Ben Rhydding is already struggling to cope. During periods of prolonged heavy rain the drains in Wheatley Lane frequently overflow, depositing debris and sewage in the road.

The schools in the ilkley area are already full to capacity, with families presently being unable to obtain places for their children in local schools. This problem is particularly acute at Secondary Level. The development plan does specify how the increase in people of school age in the area will be dealt with (namely where additional schools would be built)(

The same issue applies to Health provision, with Health Centres and Dental Practices all struggling to accommodate the current population. The plan does not address this, no mention being made of the need increase Health and Educational provision in the area.

In designating sites suitable for housing development the plan is suggesting releasing land that is presently identified as "Green Belt" rather than the presumption of "Brown Field First" as laid down in government legislation.(National Planning Policy Framework). To take land out of the green belt would deprive the area of a number of significant wildlife habitats. Land to the east of Wheatley Lane(IL/013-014) is presently a habitat for ground nesting birds such as lapwing and curlew all of which will be lost if this and other green belt land is built on.

The plan proposes that 55% of new housing in Ilkley is built on land that is presently "greenbelt" whereas in Bradford the figure is 25%. This I feel is disproportionate and could be viewed as opportunistic and not thought through.

Also this area forms a natural boundary between Ilkley and Burley to the east. Taking this land out of green belt would result in "ribbon development" along the Wharfe Valley.(p.91/D4 of the plan states that it is important to "recognise the importance of field patterns, tree cover and the wider context of moorland, river and woodland in providing habitats for a diverse range of species and contributing towards Wharfedale's distinctive character and its role as a gateway to the wider countryside."

I would suggest that the level of housing for the Ilkley area proposed in the plan is "over development."

The proposals laid down in the LDF show development on land to east, west, north and south of Ilkley, effectively surrounding what is a traditional Victorian Spa town with modern developments. The result of this would be to change the character of the town.

Finally the plan does not make clear the number of affordable homes being planned for the Ilkley area. In Bradford as a whole there is a recognised need for affordable homes. Why not then build such homes on "brownfield sites" in central Bradford where they are needed and near to employment, rather than in a rural area, where homes are traditionally more expensive and beyond the reach of first-time buyers.

**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 plan needs to address how the infrastructure will adapt to the likely significant increase in the population. This will need to address how the roads will manage the likely increase in traffic. Further, will the railways increase the amount of capacity on the Wharfedale line and is the number of train carriages to be increased,

There should be extensive consultation with Yorkshire Water to determine how drainage and flood relief would deal with the increased housing provision as proposed in the plan.

It needs to be made clear just how many "affordable homes" are planned for Wharfedale, rather than the vague figure of a maximum of 30%. In effect this could be as low as 5% (given that developers could argue that the higher figure is not sustainable)

The amount of land released from "green belt" needs to be kept to a minimum, as once this land is developed it is lost forever, changing the character of this area of Wharfedale.(and is contrary to the ethos of the National Policy Planning Framework)

**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:**

30.03.14

## 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.**

