

Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012

Publication Draft - Representation Form

Monday 17th February until Monday 31st March 2014

This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:

www.bradford.gov.uk/ldf

For further information you can contact the Local Plan Group by:

- **Emailing us at:** ldf.consultation@bradford.gov.uk
- **Phoning us on:** (01274) 433679

Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- **Part A** – Personal Details
- **Part B** – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- **Part C** – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

Please return this completed representation form to the Local Plan Group by either:

- **E-mail to:** ldf.consultation@bradford.gov.uk
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,
2nd Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

For your representation to be 'duly made' the Council must receive it no later than 5pm on Monday 31st March 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	Mr	
First Name	[REDACTED]	
Last Name	Shirt	
Job Title <small>(where relevant)</small>	[REDACTED]	
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: 29 March 2014

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	Paragraph	Various	Policy	Various
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		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.

Bradford UDP conflicts with National Planning Policy in the following ways:

1. On Ilkley being designated as a 'Principal Town':

1. Para 158. It is not a major employment centre and is a very small part of the Bradford District.
2. Para 158. Ilkley is on the furthest edge of the district away from Bradford City.
3. Para 158. Housing in Wharfedale is expensive. Any suggestion that some of the housing will be affordable is therefore very misleading. The real pressure for more housing is in the larger conurbations where people want to live and work.
4. Para 62. Ilkley's unique position on the edge of the moors and the Dales should not be compromised by any new development.

2. On Green Belt:

1. Para 80. The current town boundary is a logical and clear one. Releasing land for building beyond this point will seriously weaken arguments against further expansion in the future.
2. Para 79, 80, 81, 82 and 83. The plan does not support or protect the Green Belt or agricultural land as it should. What exceptional circumstance warrants this violation?
3. Para 28 and 112. The land suggested for development is prime agricultural land which should be valued.
4. Para 128. The plan is supposed to protect heritage assets and their setting, but this proposal disregards the position of the Georgian farm house and land.
5. Para 111. There has been minimal consideration of the use of Brown Field sites or allowance for the large number of extra houses that have been added on small developments within the

town. Additionally, there are several significant planned developments within the town that could be completed to provide some of the additional capacity in a more organic way.

6. The land earmarked for houses in this plan is prone to serious flooding in parts. Development of this open space will decrease the ability of the valley to absorb flood water. The development itself will be at risk of flooding, but there will also be an increased risk of flooding downstream.

3. On Infrastructure:

1. The area has only one major road access which it is accepted as being congested. There is no plan to make improvements. In addition, the neighbouring Leeds Council plan is suggesting an extra 2300 homes nearby. Dealing with the extra traffic that these will create has not been included in the Bradford plan. In particular, there seems to be no indication of the effect on traffic in the immediate area of the development.
2. Para 13. Most new residents will be commuters as there is little local employment. Trains have been at capacity at peak times for many years already. A key aim of the planning policy is to reduce the travel. This will do the opposite.
3. Para 77. There is no plan for expansion of school, doctor or medical facilities, all of which are over-subscribed.
4. Town centre parking is already an issue and there are no plans to improve this.

4. On co-operation:

1. Para 155. Bradford has not made meaningful efforts to work with the individuals in the affected areas and so there is no shared vision. How many local residents (not those with vested interests) contributed to any stage of the plans?
2. Para 155. Our recent dealings with the council over local planning issues do not suggest that the council is really wants to hear local or individual concerns – quite the opposite in fact.

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.

With reference to the paragraphs above.

1. On Ilkley being designated as a 'Principal Town':
 1. Ilkley's geographical position and its distinct nature make it unsuitable for a development of this scale. How can a 'Principle Town' and the scale that is implied by this title have only one road, no direct trains outside of the region, limited bus connections, no accident facilities and over-subscribed facilities. Even the council's own administration services have been largely withdrawn.
2. On Green Belt:
 1. It is difficult to see how the principle of preserving the Green Belt except in exceptional circumstances can possibly lead to the acceptance of this plan. Tinkering with the scale or the wording of the plan will never meet this principle.
3. On Infrastructure:

1. This plan and other similar schemes do not even try to address the obvious issues of providing key services for any new development. The plan needs to have a serious and realistic study of the possible impact on the local infrastructure. More importantly, if there is any serious intention to meet the concerns of residents, it needs to have fully developed and costed plans aimed at maintaining or improving the current service provision.
2. If these infrastructure issues are addressed correctly, it will then be committing Wharfedale to further consequential development in the future for new schools, doctors, road development etc.. This will cause more pressure on land, Green Belt and further degrade the unique nature of Ilkley and the Wharfe Valley.
4. On co-operation:
 1. See para 3.1 in this section of the form. There seems to be a suggestion that the new houses will be built and that the pressure on local services and the surrounding infrastructure is something that will follow later, without and serious plan or indication of how this might be achieved. It's difficult to see how existing residents can see this as a co-operative approach.

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:

Date:

29 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.