



For Office Use only:		
Date		
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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	Mr	
First Name	[REDACTED]	
Last Name	Hall	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3		
Line 4	Ilkley	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED] Hall	Date: 24/3/14

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.

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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	5.2	Paragraph		Policy	TR1
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4. Do you consider the Plan is:

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

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When one considers a strategic plan, one must take a much wider view than just that of the affected area

These are facts:

- 1) The A65 corridor is already at maximum capacity during peak hours, and weekends when the weather is good (this has been shown in 2 studies in recent years)
- 2) The rail network that serves Wharfedale is already at maximum operating capacity during peak hours. This is due to the single line sections around Guiseley and Apperley Bridge and the limited size of multiple unit that can be carried by the platforms on the line.
- 3) The road system through Shipley from either Keighley or Guiseley directions is already at capacity.
- 4) A greater proportion of the employment in West Yorkshire is to be found in the main centres of Leeds and Bradford, with much of the other employment provided in Keighley, Halifax, Wakefield Huddersfield. Relatively little employment is to be found to the north or north west of the region.
- 5) Parking at and around stations in Ilkley, Burley, Menston is already unmanageable. Commuter parking in Ilkley during the day stretches for a distance of at least half a mile from the station and town centre in some directions.

Given that Leeds are also planning to build somewhere in the region of 2500 new homes in Aireborough, also served by these transport means, aiming to build another 1600 new homes in the Wharfe Valley is simply unsustainable. There is no way of improving these current transport links.

There is reference made in the document to Modal Shift. Anyone who really believes that this will have

any impact on the car-centric population of the UK is quite frankly naïve. Evidence of this is not hard to come by – take the bus scheme from the newly built High Royds estate. This was underused from the start, and now that the developers' requirement to provide it has expired (I believe) the service is being withdrawn. People would rather drive their cars the half a mile and park at the station. The same can be said of the current residents around the station locations; if the walk is longer than 500m, people would rather drive.

Cycling from these population centres to the main employment centres is too hard for the average person, and cycling provision in the county is appalling at best.

Figure WD1 mentions 'Excellent road and rail connections to Bradford and Leeds' – this may be true outside of peak hours, the reality is that at peak times these modes of transport are simply full. There is no more room as anyone who has to commute between wharfedale and Leeds will tell you. Bumper to bumper car journeys or standing room only on the trains.

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).

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I suggest that the number of houses planned for Wharfedale is dropped considerably. A maximum of 800 houses between all 4 settlements over the next 15 years, released in small batches

Any housing development in Wharfedale must be accompanied by improvement of the transport links to Leeds and Bradford and thus beyond. The only feasible way of achieving this and sticking to transport targets is to invest heavily in the rail networks that serve Wharfedale and Airedale to allow longer platforms, dual direction travel through the Guiseley / Apperley Bridge triangle.

Unless the rail network is improved vastly, only organic growth of small developments should be allowed.

The road system cannot be increased in capacity as there are too many pinch points along the way that would require substantial demolition to widen the roads.

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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:

 Hall

Date:

28/3/14

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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	5.3	Paragraph	[]	Policy	H04
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4. Do you consider the Plan is:

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4 (2). Sound	Yes	[]	No	X
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With reference to Ilkley in particular, but taking into accounts the needs of families in Addingham, Burley and Menston, how can the currently proposed number of houses possibly be allowed given the lack of school places in the area.

Ilkley's primary schools are already at capacity. Ashlands has had recent extension work onto the playing fields (yet more green space going) to move to 2 form intake.

Ilkley grammar school is widely acknowledged as being an excellent school that is already overcrowded and has no room to expand. The proposed new school (before the funding disappeared with the change of government) was to be built on land that is now earmarked for more housing.

So I ask you, just where do you propose to educate the children that will come with another 1500 new houses in the area?

Prince Henrys in Otley is full. Guiseley Fieldhead is full, and will only become more full with the new developments there. Skipton Girls and Emrysteds are also at capacity and it is harder for Wharfedale children to get there every year. And St Marys is a catholic school and not thus appropriate for many people, also full. Many Menston children cannot get into Ilkley Grammar any more.

It is only due to the higher average wealth of the area that means many children go to the private schools. If, as demonstrated in the recent recessions, the average salaries of the area fall, or bets are tightened, this only means that less children go to the private schools and require places a the local schools, thus putting on more pressure for places.

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I suggest that the number of houses planned for Wharfedale is dropped considerably. A maximum of 800 between all the areas in the next 15 years, released in small batches to allow steady changes in school population.

There is no room to school these children.

If any development is allowed to take place beyond small organic schemes, then another secondary school must be provided in the Menston / Burley area.

Or, the land once earmarked for the new school in Ilkley must be used for this new school (with free travel for children on the trains to and from school). But then you couldn't build on it.

Or perhaps some common sense could prevail, and the land that Tesco currently occupies could be given over to the school for expansion as they have been granted permission (against a majority of disagreement) to build a new store on the other side of the tracks.

This would solve some of the space issues for the school.

But the bottom line is clear. There CANNOT be any major development in the Wharfe Valley in the future without addressing the need for school places.

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Hall

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28/3/14

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	3	Paragraph	60	Policy	Sc4
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4. Do you consider the Plan is:

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

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Ilkley is designated as a principal town alongside Keighley despite its relatively small size and unique rural character. I note that one of the aims for a principle town is

“Ensure that they provide the main focus for employment development in rural areas.”

Ilkley is mainly a commuter town with some elements of industry / employment. If one mitigation of large scale development is to employ a majority of the new population in local jobs, just where are they expected to come from? Is it the intention of the plan to also build new commercial/industrial complexes to host these jobs? Few companies will want to base themselves in such an inaccessible place (it takes 45 mins to reach a motorway from Ilkley)

How can this statement

“Create new and improve existing green areas, networks and corridors including the urban fringe to enhance biodiversity and recreation”

Be reconciled with the fact that 55% of the land earmarked for development around Ilkley is Green Belt?

Green belt land, once developed, is gone forever. What makes Ilkley / Burley / Addingham so special is the fact that they have remained fairly rural and not just become part of the ever extending Leeds/Bradford conurbation.

“Improve public transport links between Ilkley, Keighley, Bingley, Regional Cities of Leeds and Bradford.”

I think it has already been well established that it is not feasible to increase capacity on the infrastructure connecting Ilkley to Leeds and Bradford without massive investment in road widening or more

importantly rail line capacity. I note that nothing in the document provides any way of addressing this shortfall. As a note on rail investment – HS2 misses the point of rail investment – it is local commuter rail lines that need the investment, not just another means to suck the life from Northern cities into London. The investment must be made on the Wharfedale / Airedale lines if large scale building is allowed.

It should be noted the Ilkley does not have a hospital or emergency medical facilities. Bus services are being cut back as we speak, particularly to Bradford and Keighley.

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Ilkley should not be considered a principal town in the same context as a large centre of industry and employment such as Keighley. It is a rural town inhabited mostly by commuters to the employment centres of Leeds and Bradford.

Perhaps if Bradford wish to consider it a principal town, they might like to consider investing in it like one. A new leisure centre and more sports facilities would be required. Better hospital services. As it is currently, Bradford seem unable and/or unwilling to provide or fund facilities in Ilkley in keeping with its population levels.

If the intention is to make it a principal town with travel connections commensurate to this, then provision MUST be made in the plan to improve the road systems of the A65 and through Shipley, plus investment must be made in the rail network.

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9. Signature: 	Date: 28/3/14
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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	4	Paragraph		Policy	WD1 E2
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4 (2). Sound	Yes		No	X
4 (3). Complies with the Duty to co-operate	Yes		No	

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I thoroughly agree that much more provision for sustainable transport should be included in any plan for the area. Will this include the all important conversion of the old railway to addingham / Bolton abbey as a way of reducing traffic movements between addingham and Ilkley station?

Given a safe off road route between the two settlements would encourage more people to cycle, thus taking cars off the road at peak times) and reduce the need for parking in Ilkley.

Proper cycle friendly road design along the A65 / A660 is another important way of encouraging more journeys by bicycle.

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Include provision in the plan for enforcing the creation of an addingham to Ilkley cycle route, including Bolton Abbey as well

Include provisions for the upgrading of cycle friendly routes throughout the whole Wharfe valley as a requirement for development, above and beyond the usual requirements for cycle friendly design in the immediate vicinity of a development that are often imposed on a developer.

Make subsidised bus provision for any developments a Long Term requirement, not just some short term box-ticking lip service to sustainable transport.

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9. Signature:

[Redacted Signature]

Date:

28/3/14

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	ALL	Paragraph		Policy	
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4 (2). Sound	Yes		No	
4 (3). Complies with the Duty to co-operate	Yes		No	

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Given that this plan will form the basis for making decisions on planning in the future, it is incredibly difficult for anyone to comment on it.

Having to read and understand a complex and long document, then cross reference every comment to the correct paragraphs/ sections / policies will put off a great proportion of the community from commenting on what is their future.

It is unrealistic to expect a layperson to understand the legal compliancy of the document, or whether the duty to co-operate has been successfully actioned.

All a layperson can do is try and make their voice heard. If you discard this voice on the basis of incorrect references or lack of specifics document location information on what they are commenting on then this is grossly unfair. It is no small undertaking to try and comment on this document within the rules set down. People must have a say in the future planning for their area, regardless of their ability to handle complex documentation.

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All and any submission should be taken into account and all best efforts put in to trying to identify the areas that the submission is targeting regardless of whether the information has been provided.

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28/3/14

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	5.3.30	Policy	HO2
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	X
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Once Green Belt land is gone, it is gone forever. The landscape is irrevocably changed.

The Leeds/Bradford area has large amounts of brownfield sites, empty homes, 'undesirable' areas. It is obvious that developers prefer not to develop this land as it isn't as cheap and easy as taking a green field and dumping a large amount of pattern book housing on it in a short space of time.

Redeveloping areas takes a bit more time and thought. But it is of great importance to society as a whole that green belt land is protected and not released unless all other options have been exhausted.

These needs of society and environment are at odds with the needs of the landowners and developers who are solely interested in maximising the profit from their investment. They are rubbing their hands with glee at the thought of being able to get their hands on prime greenbelt land in the wharfe valley – with high property prices already the return on their investment promises to be huge.

Anyone who thinks that the developers will be thinking of anything other than this Return On Investment is kidding themselves or is frightfully naïve. Companies exist solely for the reason of making profit for their shareholders. If they have to kowtow to some housing policies and planning requirements on the way, they will do so, so long as this means they can get their hands on the land.

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Provisions must be put in place to ensure that green belt land is only considered once ALL the brownfield / non-greenbelt land is used up. Then, and only then should any de-classification of green belt land be considered.

Developers sitting on non-greenbelt land that has not been utilised must be forced (or strongly encouraged) to use it. (cf. Tesco's in Ilkley). The local authority and government must apply this pressure and not be dictated to by the developers. The needs of society must outweigh the needs of the developer in areas such as housing and infrastructure.

It should also be written into this strategic plan that land release should be limited in size. Growth should be limited to make the housing more varied, the design more organic.

You cannot allow pop-up estates to happen as they destroy the nature of the area with their pattern-book designs. I suggest a maximum release of around 20 dwellings at any one time.

More urban apartment living should be considered for Bradford before the countryside is paved over.

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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	1	Paragraph	1.12	Policy	
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4 (2). Sound	Yes		No	X
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This strategic plan makes a lot of noise about taking into account the needs of the local communities. These local communities do not need more housing themselves. To defend this plan on the basis that they do is disingenuous.

What the plan is suggesting is that society as a whole needs more housing. The reasons for this are manifold: population growth, immigration, more split families with each parent requiring a family sized home, people aspiring to live in an area as it is better than where they live at the moment.

This need for more housing can be addressed in many ways – this plan is about communities being asked to accommodate more people within their environment. This is fine as long as the development in these communities is sustainable in terms of long term transport infrastructure, social, municipal facilities etc. But at some point the line must be drawn and an area declared 'full'.

Yes, wharfedale is expensive to buy a house in. It's a desirable area to live. Supply and demand dictates this. Releasing green belt land to satisfy an imposed quota in this area is wrong. Building more houses will not reduce the cost of living here. It will just net the developers a windfall profit.

Has any attempt been made (apart from this complicated and inaccessible document) to understand the needs of each community in the area? Ask people in wharfedale and I suspect that housing is not what they want. It's better school accommodation, a leisure centre, road improvements – just some investment and care from the local authority. I believe that there is a requirement (or certainly a promise) from the incumbent government that local people would have a greater say in the planning requirements of their area.

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All references to this plan being for the benefit of the communities must be removed from the plan. Reference must be made in an honest manner to this being an imposition of a quota.

If you genuinely want to refer to the needs of the community, then you need to engage with them better. Listen to what they are saying, rather than just listening to the clamouring of the estate agents, the developers, the people aspiring to live somewhere they want to.

This document which sets out the future of planning decisions in the area is not effective, as it is inaccessible to the average Joe.

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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.

1. Do you live within or have an interest in the Bradford District?

I do not wish to participate in this monitoring exercise