



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	Ince	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	Ilkley	
Line 3	West Yorkshire	
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 29/03/14

#### 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	Section 3,	Paragraph	para 60	Policy	policy SC4
---------	------------	-----------	---------	--------	------------

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

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	✓
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.**

**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.**

Ilkley has been designated a “principal town” alongside Keighley and Bingley. However:

- Its population is less than 3% of the Bradford District
- It is one-third the size of Keighley
- It is not an employment centre, more of a commuter centre (Section 2, para 52)
- It sits on the edge of the Bradford District
- Most administrative council services have been removed.

The assumptions on which the plan is based are therefore unsound.

In addition, although I am familiar with local government processes through a 25 year career in NHS management, I have found that the documentation does not facilitate representations from individuals. I therefore believe the process does not comply with the duty to cooperate.

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.

There is adequate brownfield land available in the Bradford District to respond to the population increases, so that no green belt releases are necessary.

Empty homes in the Bradford District should be brought back into use. On 11 January 2011, the Telegraph and Argus reported that "latest figures show there are 13,720 empty properties in Bradford".

There are a number of large housing developments in Ilkley that have been halted for some time e.g. Clifton Road, Bolling Road. Developers should be required to build on the many sites they already have and on which planning approvals have already been granted.

*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, 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:

[Redacted Signature]

Date:

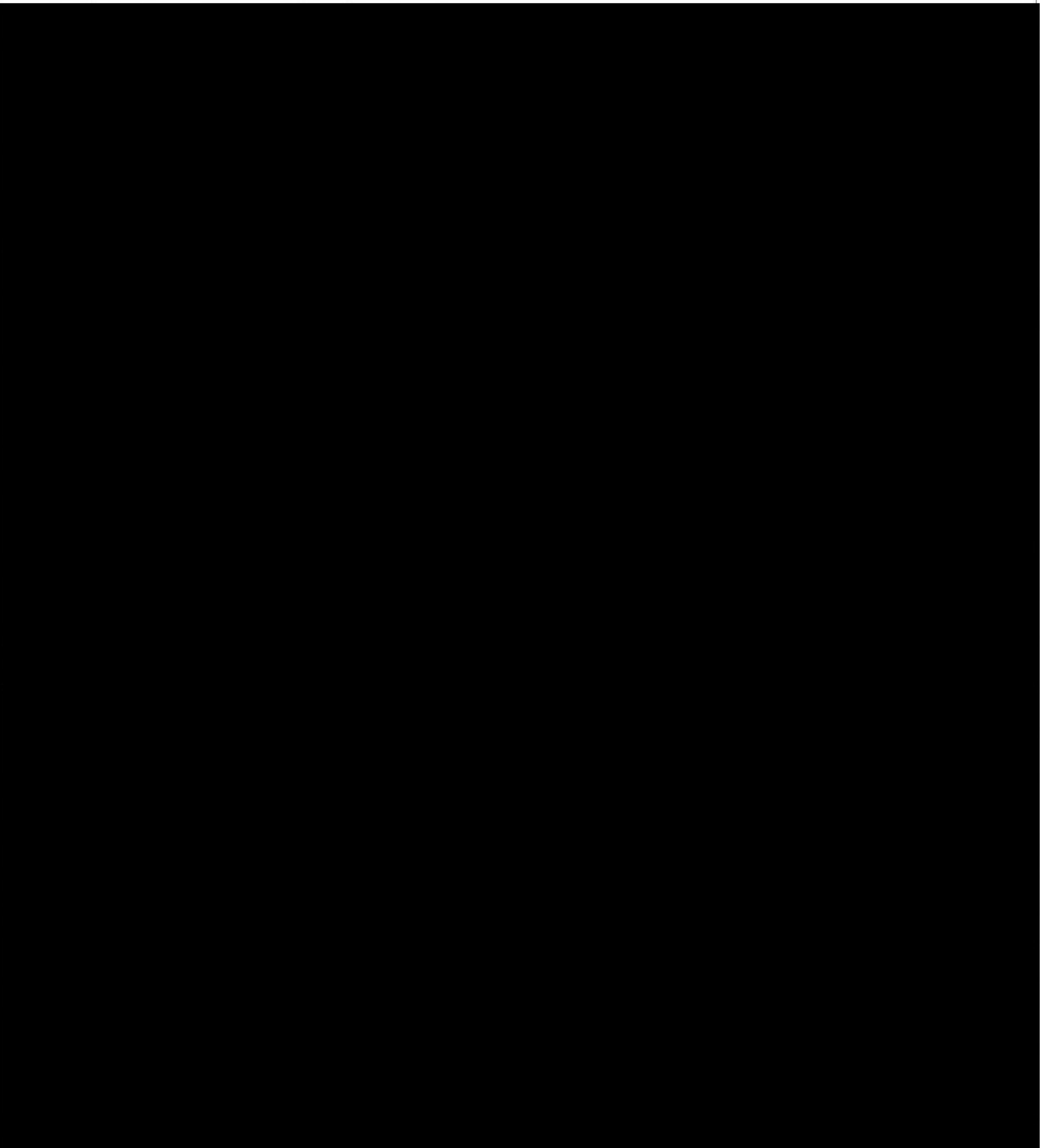
29/03/14

## 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.**



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	5.2	Paragraph	62	Policy	H03
---------	-----	-----------	----	--------	-----

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

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	✓
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.**

**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 plan is unsound because is not justifiable as the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Specifically, the plan's proposals do not sufficiently recognise that Wharfedale is distinct from the rest of the district given that:

- 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
- jobs are elsewhere, typically Leeds but also Bradford
- house prices average £340,000 compared with £140,000 in the rest of District. 34% of Bradford residents live on very low incomes. The majority of Bradford people would not be able to afford the type of housing that is planned to be built in Ilkley.
- there is very little derelict land in Ilkley for brownfield development
- Bradford is ranked as the 2nd most deprived area in Yorkshire and Humberside yet Ilkley, Ben Rhydding and Burley in Wharfedale are among the least deprived areas in the country (Section 2 para 33).
- The moor, which separates the valley from the rest of the conurbation, and proximity to the Yorkshire Dales National Park and Nidderdale Area of Outstanding Natural Beauty, create a unique environment that would be compromised by the scale of the proposed development. (Section 5.2 para62 policy H03)

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.

There is adequate brownfield land available in the Bradford District to respond to the population increases, so that no green belt releases are necessary.

Empty homes in the Bradford District should be brought back into use. On 11 January 2011, the Telegraph and Argus reported that "latest figures show there are 13,720 empty properties in Bradford".

There are a number of large housing developments in Ilkley that have been halted for some time (e.g. Clifton Road, Bolling Road). Developers should be required to build on the many sites they already have and on which planning approvals have already been granted.

*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, 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:

[Redacted Signature]

Date:

29/03/14

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	Section 5.3	Paragraph	para 64	Policy	HO3
---------	-------------	-----------	---------	--------	-----

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

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	✓
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.**

**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 proposal for 800 new homes in Ilkley over the life of the plan is unsound because:

- There has been no attempt to assess local need
- The strategy sets out positive measures for minimising green belt releases, valuing green infrastructures, protecting habitats (Section 3 paras 103 – 116 policy SC8), minimising additional travel arising from development, boosting tourism all of which are at odds with the scale of building proposed
- Housing numbers have been reduced on account of a Habitats Regulations Assessment (HRA), but only by 38% in Ilkley whereas the combined reduction across the rest of Wharfedale is 56%
- The whole of Ilkley comes within the 2.5km habitats protection zone designated under the HRA (Section 3 para 106)
- It is unclear from the strategy therefore how the figure of 800 new homes was calculated
- No account is taken of Ilkley’s fairly unique house building profile and the fact that there’s an ongoing process of re-development of large individual property sites and this has lead to a windfall of around 500 new homes since 2004

More than 25% of the District’s new homes will be built on green belt and for Ilkley this will be at least 55%, yet the National Planning Policy Framework (NPPF) 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 countryside 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 plan is unsound because it conflicts with the National Planning Policy on preserving the green belt.



The plan is inconsistent with national policy and does not enable the delivery of sustainable development in accordance with the policies in the framework.

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.

There is adequate brownfield land available in the Bradford District to respond to the population increases, so that no green belt releases are necessary.

Empty homes in the Bradford District should be brought back into use. On 11 January 2011, the Telegraph and Argus reported that “latest figures show there are 13,720 empty properties in Bradford”.

There are a number of large housing developments in Ilkley that have been halted for some time e.g. Clifton Road, Bolling Road. Developers should be required to build on the many sites they already have and on which planning approvals have already been granted.

*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, 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:**

29/03/14

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	Section 3	Paragraph	para 15.3	Policy	
---------	-----------	-----------	-----------	--------	--

**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.**

Section 3, para 15.3 of the Core Strategy states that it is vital that there is sufficient infrastructure to support the plan. However, the Local Infrastructure Plan (LIP) Oct 2013 makes scant provision for infrastructure improvements in Wharfedale.

The road network (particularly the A65) is not capable of sustaining such a level of development when

- Leeds Council is also planning to build 2300 new homes in Aireborough, also served by the A65
- Two studies in recent years have concluded the A65 is congested and there are very limited opportunities to increase highway capacity, the route through the centre of Ilkley being a huge hurdle
- Despite this the LIP does not propose any investment
- Studies have also suggested that each new home leads to an extra 8 vehicle journeys per day and yet a key aim of integrated land use and transport planning is to reduce the need to travel (Section 5.2 para 13)
- Measures are being encouraged to increase tourism/visitor numbers to Ilkley

Ilkley will not be able to sustain the parking requirements of increased numbers of residents, commuters and visitors when

- Parking is already inadequate for commuters needing day long parking
- Land is scarce

The rail network is not capable of sustaining the extra commuters when

- It is already experiencing overcrowding on peak trains
- The LIP recognises the need for additional rolling stock but admits there is no committed funding for this

- There seems little scope for increasing capacity in train length (short platforms) or in frequency (congestion at Leeds station and single track working on parts of Leeds and Bradford lines)

Ilkley schools are not able to meet the increased demand from the proposed new homes when

- Bradford District Education Organisation Plan shows that primary schools in the Wharfe valley are presently over-subscribed and will continue to be so until 2017 which is as far as the Education Plan goes
- The need to increase the capacity of Ilkley Grammar School has long been recognised by the council
- The LIP recognises that the shortage of school places “could pose significant challenge to delivering growth” (LIP para 5.5.1) yet has no proposals to alleviate the situation
- The extra demand will probably lead to schooling solutions outside the Wharfedale catchment area with extra car/bus usage and attendant impacts on environment

The plan is therefore not sound because there is no corresponding infrastructure planned to deal with the consequences of extensive new housing development.

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.**

There is adequate brownfield land available in the Bradford District to respond to the population increases, so that no green belt releases are necessary.

Empty homes in the Bradford District should be brought back into use. On 11 January 2011, the Telegraph and Argus reported that “latest figures show there are 13,720 empty properties in Bradford”.

There are a number of large housing developments in Ilkley that have been halted for some time e.g. Clifton Road, Bolling Road. Developers should be required to build on the many sites they already have and on which planning approvals have already been granted.

*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, 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:**

29/03/14