

For Office Use only:			
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Core Strategy Development Plan Document

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

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	Councillor	
First Name	[REDACTED]	
Last Name	Smith	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Ilkley	
Line 4	[REDACTED]	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 29 th March 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.

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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	4.3	Paragraph	C	Policy	WD1
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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.

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 is expected to have an important role in Economic Development in Wharfedale, p. 90 Policy WD1 para C1. This is predicated on excellent rail and road connectivity. The picture so painted ignores the heavily congested line to Leeds and the almost gridlocked A65 into Leeds and the A6038 into Bradford together with very poor links to the motorways.

This increasingly congested transport system not only discourages any real growth in new employment into any part of lower Wharfedale but has been a significant factor in the progressive loss of employment in the area over the last 10 years. This area includes Otley, Guiseley and even Rawdon all of which were in the past major employment towns for Wharfedale residents. (All these previous commercial/industrial sites have been developed as housing sites with no job opportunities. It is evident that this trend will continue as planning and Health and Safety and Environmental requirements make any remaining premises unlikely to be approved or to be suitable for any significant job returns).

Even the developers for the proposed development sites in Menston recognised that all new house owners will have to travel beyond these areas for employment.

To reinforce this point the 2012 draft of the LDF Bradford Council recognised that the proposed employment in Ilkley is likely to be small scale, opportunistic and be primarily latent demand from local companies – ELR para 4.2.16- and is unlikely to provide more than a modest number of jobs, *predominately in health, financial and business services.*

Policy WD2 para A seems unrealistically out of touch with reality, emphasising as it does connectivity between Ilkley, Burley and Menston talks about improved access to virtually nonexistent jobs, especially for the disadvantaged (arguments well documented in my other responses).

The conclusion is that Ilkley is most unlikely to be a local source of sufficient new employment to meet even a small proportion of the proposed new development in the valley and so this aspect of the plan is highly speculative and unsound.

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 WD1 para C needs to have a statement on the realistic expectation of new employment in the Wharfe valley in support of new housing targets.

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?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	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:

To ensure that a local, democratically elected voice is heard.

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 th March 2014
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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.