

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: 30 <sup>th</sup> 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	E	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.**

The policy intention in Para E4 is to improve the links from Wharfedale to Airedale, Craven, Leeds and Bradford. This is long overdue but there are no significant highway improvements either in the Core Strategy or the associated evidence base with the possible exception of a much vaunted proposed link road around Shipley.

The Bradford Transport Report (BTR) used in the Evidence Base already notes in 2010 Para 7.98 that significant and increasing delays, resulting from severe congestion, are apparent on the A65 at the junctions in Menston, Guiseley as well as Ilkley. This is already resulting on severe delays on the A65 corridor. The only solutions suggested are changes to the junctions on the A65 from Menston to the A6038. Junction improvements were only recently made at Menston and the delays at the A65/A6038 junction is unlikely to be reduced as the problem is severe congestion on the A65 in Guiseley which Leeds MDC have already admitted does not have an identifiable solution. Likewise the A6038 to Bradford via Hollins Hill and the Shipley bottleneck is also severely congested, see Para 7.94/5. The route into Bradford via the A65 and the A658 is no less congested.

Para 7.94 also notes that already significant traffic flows exist on parallel routes to avoid congestion on these two roads. Unfortunately these are all minor country routes out of the valley which also suffer from weather disruption especially in the winter.

The A660 likewise has severe congestion at the junction with the A658 Airport Road and from the approaches to the A660 all the way into Leeds.

Whilst the roads from Menston and Burley to Ilkley, Otley and Harrogate arguably have spare capacity, including during the commuter period, this is of little comfort as only a limited number of residents in Lower Wharfedale are employed in these areas and there is small opportunities for jobs growing in those destinations.

The contention in para C.3 that Wharfedale has excellent roads is totally inaccurate and misleading (almost to the point of in exactitude) with respect to the main corridor route the A65 to Leeds and the A6038 to Bradford. What is more there are no proposals of meaningful improvements to these routes recommended in the BTR or Core Strategy.

Trains to Leeds are already among one of the most congested in the country. This forced the introduction of additional train capacity in 2011 to cope with increasing traffic but was likely to be only a short term solution and future improvements due to constraints at Leeds City station have not been identified. Further the cost of any possible improvements would be well in excess of any likely S.106 contributions and would require alternative sources of funding. Accepting that about 20% of residents in Wharfedale use the train into Leeds any material increase in housing in the area will be constrained by rail capacity.

Whilst there is room on the trains to Bradford this is mostly because of the lack of easily accessible suitable employment in and about Bradford Centre.

The evidence is that for Menston and Burley residents transport links are very heavily congested to areas of employment.

**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 statement given in para C3 of the Sub Area Policy WD1, *that there are excellent road and rail links* is totally inaccurate and misleading and should be removed from the document.

**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:**

[Redacted Signature]

**Date:**

30<sup>th</sup> 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.**