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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	Professor	
First Name	[REDACTED]	
Last Name	Pilling	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)		
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: 30.03.2014

#### 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	3	Paragraph	60	Policy	SC4
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes	X	No	
4 (2). Sound	Yes		No	X
4 (3). Complies with the Duty to co-operate	Yes	X	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 only 3% of the population of Bradford District yet has been designated as one of three principal towns.
- It is not an employment centre and is on the edge of the District, so that the development would lead to additional use of public and private transport.

It relies heavily on tourism, is a major centre for the beautiful Lower Wharfedale and would be seriously impacted by the proposed building, especially by that on green belt

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.

It would be more practical, especially in terms of availability of local employment, on travel and on tourism to reduce substantially the extent of the proposed house building in Ilkley and to build more in areas where the impact is less severe.

*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?

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:

Date:

30.03.2014

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

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

Section

5.3

Paragraph

64

Policy

HO3

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

4 (1). Legally compliant

Yes

x

No

4 (2). Sound

Yes

No

x

4 (3). Complies with the Duty to co-operate

Yes

x

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 building of 800 homes is excessive:

1. Most of these homes will be built on greenbelt, despite the NPPF's recommendation that "greenbelt boundaries should only be altered in exceptional circumstances". To alter them in Ilkley, an important, scenically beautiful hub in Wharfedale, adjacent to the Yorkshire Dales National Park and the Nidderdale Area of Outstanding Natural Beauty, is unsound. The visual impact of the large green belt sites proposed (IL009, 012, 013, 014, 019) will substantially detract from important views in and around Ilkley.

2. Some significant house building is planned for the relatively near future, yet there is no information given on infrastructure development.

(i) Traffic in Ilkley is already bad. Ilkley acts as a bottleneck for through traffic along the A65. Parking along side roads is excessive and in places unsafe.

(ii)Trains are already overcrowded at rush hours and it is difficult to see how capacity can be increased. The proposals for such increases in capacity lack detail and are unconvincing.

(iii)Primary and Secondary School places are already inadequate; the situation at Ilkley Grammar school is reaching crisis proportions. The building expansion proposed in Ilkley, Burley in Wharfedale and Addingham will substantially exacerbate the problem and children will have to travel significant distances to School, which is undesirable on both educational and environmental grounds. There are NO proposals to alleviate this problem, indeed the LIP recognises that this issue poses a "significant challenge".

3. Ilkley is a small town in an important rural setting. The whole of the town lies within the 2.5 km habitats protection zone designated by the HRA. It is not clear that the LIP sufficiently recognises this. The proposed green belt sites, listed in 1 above, will have substantial habitat impacts if developed.

4. Some of the proposed development areas are subject to flooding. The LIP pays some attention to this issue and says that measures will need to be taken. Parts of three of the substantial proposed greenbelt developments, IL013, 014, 031 are close to, or even in, the flood plain. Given the likely increases in severe rainfall and associated flooding in the future, associated with climate change (see the recent reports from the UK Met Office and from Working Group II of the Intergovernmental Panel on Climate Change), the

planning of such developments is 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 proposed developments in Ilkley should be substantially reduced. Any home building should be concentrated on brownfield sites or on other sites within the existing built-up area. It is regrettable that planning permission was renewed for IL006 given Tesco's decision to reduce substantially their national development of new large stores. It is not inconceivable that IL006 will remain undeveloped into the future and that IL007 will, in consequence, also be unavailable for development.

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*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.***

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***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:**

29.03.2014

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**PART C: EQUALITY AND DIVERSITY MONITORING FORM**

