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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		
Last Name	BUTLER	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1		
Line 2	ILKLEY	
Line 3		
Line 4		
Post Code	LS29	
Telephone Number		
Email Address		
Signature:		Date: 30 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	A - 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.

I am writing this Commentary on the Local Plan in my capacity as a Parish Councillor and as a solicitor acting for many local people whose lives are going to be adversely affected by the development of about 800 new houses within two miles of their homes.

The Local Plan is not sound because it is made on the presumption that Ilkley is a Principal Town which, compared to other towns in Bradford MDC, is not correct.

The population of Ilkley is only 14,809 according to the 2011 census. The other two towns cited as Principal Towns in the Local Plan have much larger populations. Keighley (including Keighley Central, West and East) has a population of 51,581 (and each of those three areas has a larger population than Ilkley). Bingley (including Bingley and Bingley Rural) has a total population of 36,189 (and again each of those two areas has a larger population than Ilkley). Shipley, which is not named as a Principal town, has a larger population (15,483). Even Baildon which is named as a Local Service Centre has a larger population (15,360) but is facing a much smaller proposed number of houses (450).

Ilkley has very poor access to governmental facilities. The Town Hall is empty of public governmental facilities except for the very small office of the Parish Council, which has very little power to do anything useful and the Visitor Information Centre (which is not open on Sundays when most visitors are in town!). There was a time when the Town Hall housed council tax, planning and many other local government facilities. In the near future, the Town Hall will not be manned by a receptionist and public access will be severely curtailed. The attitude of Bradford MDC (BMDC) towards Ilkley has led to a gradual but constant reduction in the facilities available to its residents. There are no plans to return governmental facilities to Ilkley if there are more residents here. The recent BMDC plan to close our Ilkley Museum at the Manor House is typical of this problem. There is no reason to suppose that this attitude will improve when more people live here. The nearest governmental facilities to Ilkley are either outside Bradford MDC (in Otley and Leeds) or in Shipley or Keighley. There is limited public transport from Ilkley to Keighley and only train based public transport from Ilkley to Shipley (unless you travel via Otley).

Shipley and Baildon have much better access to governmental facilities, as do Keighley and Bingley.

Ilkley Parish Council is really relatively unimportant - it does not for example own any land, except allotments. Even Addingham Parish Council owns more land than Ilkley Parish Council.

Generally the town facilities are deteriorating. For example, Lloyds Bank no longer has a branch here.

The plan is unsound also because it assumes that increased housing in the town will improve the sustainability of the town. The Plan claims that it will help to create more jobs but the employment land allocated is minimal and probably exaggerated in size - there is nowhere in Ilkley to build new businesses.

It is stated that:

"The increased requirement [for housing] for the Principal Towns will help to ensure development in sustainable urban locations."

The town is already too large for the infrastructure available to it.

It is said that the plan will:

"Provide the conditions and services to improve health and well-being and reduce inequality to access and social care."

The population of Ilkley is already too large for the medical facilities available. There is only one health centre; the small cottage hospital has limited facilities (which are constantly under threat), and the nearest hospital is at Airedale, to which there are no public transport facilities except infrequent buses.

I have seen many comments about the general lack of facilities in Ilkley and the fact that the population is already too large for the facilities there are, and I agree with them all, especially those put forward by the Ilkley Civic Society.

I would like to comment specifically on two issues.

Parking is already a problem in town. Grove Road and Kings Road are two residential streets near to me which are made dangerous by the large number of cars which park there during the day. With 400 new houses at the west end of town, this parking problem will be exacerbated. The new residents will need to park near the centre of town to catch the train or to go to the shops and will find their route very difficult as they take their children to school. I was driving round town on Saturday 1st March looking for somewhere to park and there was nowhere, and there were many other cars driving round in the same way. I cannot see any specific plans in the Local Plan to address this problem.

The tourism industry, which is very important to the town, will be adversely affected because the view of the town will be adversely affected. Many tourists look at the view over the town from the Cow and Calf Rocks. If all these houses are built to the east and west of the town, they will see only a town spreading along a road, dominating the river and gradually merging with the houses coming to meet from Addingham and Burley-in-Wharfedale. Once seen, easily forgotten, and certainly not the sort of place where a tourist would want to return unlike the unique view which now exists with large expanses of Green Belt land in all directions. The Local Plan does not pay sufficient regard to the economic losses suffered by Ilkley, and indeed Bradford MDC as a whole, if the tourism industry is adversely affected in our town.

Generally, many parts of the Local Plan mention the "regeneration" of Ilkley but the Plan creates problems without providing solutions to the problems. The plan is unsound generally.

Yours faithfully
Steve Butler

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 solution in Ilkley is to invest more in infrastructure without building in Green Belt land but relying on housing expansion taking place within existing available land, either brownfield or "windfall" sites, of which many are still available. This would result in less investment being needed in Ilkley and make more available for other areas of Bradford MDC where there is more demand for affordable housing.

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 March 2014

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

