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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	Ms	
First Name	[REDACTED]	
Last Name	Stallworthy	
Job Title (where relevant)		
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: 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	5.3	Paragraph	64	Policy	HO3
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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 Distribution of Housing Development to Ilkley is 800.

This distribution seems to be made on the basis that Ilkley is a Principal Town – and I have made separate comment querying this assumption.

The number of houses for Ilkley has reduced from the original Baseline assumption of 1194 and it appears that this is in part due to the account taken of the proximity to the designated North Pennines Moors SPA/SAC (the Habitats Regulations Assessment) but only a reduction of 38% in Ilkley whereas the combined reduction across the rest of Wharfedale towns is 56%. I am unclear why the percentage reduction is lower for Ilkley. The whole of Ilkley comes within the 2.5km habitats protection zone designated under the HRA and this is recognised in Section 3 para 106 et seq.

The house building profile in Ilkley is regarded as somewhat different from other parts of the Bradford District – there is an ongoing process of re-development of large individual property sites and this has led to a windfall of approximately 500 new homes since 2004 which obviously do not feature in any of the calculations. There are also a large number of developments which have already secured planning approval but have not yet started pending an upturn in the economy. The 800 proposed in the plan will be over and above these developments.

I can find nothing in the Plan to support or justify the LOCAL NEED for 800 houses – bearing in mind the developments in recent years and those already approved and in the pipeline. It is difficult to understand the Plan and proposals unless it is more specific. Is it just down to a mathematical equation and some unclear assumptions around being a Principle Town? For other Wharfedale towns there is some acknowledgement of the difficulty of identifying sustainable locations for growth and that any

development is to meet local needs and local services.

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 Plan needs to justify why Ilkley is regarded as a Principal Town and make clear what specifically that means in terms of housing and other proposed development.

The Plan needs to explain how it has taken into account Habitats Regulation Assessment in reducing the numbers from the original Baseline and why Ilkley's reduction is smaller than other Wharfedale towns

The Plan needs to provide a detailed explanation to justify the local need for 800 houses for Ilkley.

(To note that I have also made separate representation on the Principal Town assumption – Policy SC4)

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:

29th March 2014

