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| For Office Use only: | | | |
| Date | | | |
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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 | [REDACTED] | |
| Last Name | Sundstrem | |
| Job Title (where relevant) | | |
| Organisation (where relevant) | | |
| Address Line 1 | [REDACTED] | |
| Line 2 | [REDACTED] | |
| Line 3 | Ilkley | |
| Line 4 | West Yorkshire | |
| Post Code | LS29 [REDACTED] | |
| Telephone Number | [REDACTED] | |
| Email Address | [REDACTED] | |
| Signature: | [REDACTED] | Date: 25/3/14 |

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 |
|---------|-----|-----------|----|--------|-----|

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 | | No | x |

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.

800 homes are planned for Ilkley over the life of the plan, however this does not appear to be backed up by evidence of local needs assessment for the specific housing needs of the Ilkley area / Wharfedale corridor, and as such is neither positively planned, justified nor compliant with the duty to cooperate.

The total of 800 homes is at odds with the approach set out (section 3 – paras 103 – 116, policy SC8) of minimising green belt releases, valuing green infrastructures, protecting habitats, minimising additional travel arising from development and boosting tourism. Ilkley is entirely based within Zone Bi of the Zone of influence of the South Pennine Moors; building 800 additional homes in this area (with the concomitant reliance on use of Green Belt sites) is inconsistent with protecting habitats and boosting tourism. Whilst housing numbers have been reduced on account of the Habitats Regulations Assessment (HRA), this reduction is only 36% and is both inconsistent with the reduction across Wharfedale and lacking justification in the document, appearing arbitrary.

800 additional homes will have a major impact on the local transport network. The additional journeys, recognising that much of the Wharfedale community commute to the central urban centres, will be unsustainable and are not consistent with minimising additional travel from development. The A65 route through the Wharfedale corridor and the A660 are both severely congested, and there are few opportunities to increase highway capacity. The train network (especially on the Leeds trains) is already severely overcrowded during the peak hours; there is limited capacity to increase this due to the length of platforms and sections of single lane track on routes to both Leeds and Bradford.

Local facilities including schools and healthcare (there are no NHS dentist places available as it stands), will be stretched further by the additional housing – presumably any proposal will include more facilities that will have an even greater requirement for the unsustainable use of green belt.

800 additional new homes in the Ilkley area, with the release of green belt sites, will not have a positive impact on tourism and will likely deter visitors due to the high traffic, limited parking and reduction in 'the heritage value' of the surrounding countryside if development takes place in the green belt.

The risk of 'ribbon development' is high in order to satisfy the 800 houses, which will result in a loss of character within the wharfedale community and a lack of the distinct character of each village and town.

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 should be modified to reflect a more modest increase in housing numbers for Ilkley (and other Wharfedale proposed sites). This should be cognisant of the different population profile and requirements that mean growth and housing requirements are lower. A reduction to no more than 200 houses would be more suitable, with a focus on brownfield sites and existing greenfield options, protecting the HRA and green belt (with a similar scale of reductions in the other wharfedale sites).

Any shortfall in housing development across the district as a whole would be better focused on the areas of real growth and housing shortfall such as Keighley and Bradford, where there is a significant volume of brownfield sites that can be effectively developed.

This approach will ensure that the plan is positively prepared and sound.

***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:

| | |
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| | |
|--|--|

Date:

25/3/14

Additional Representation

| For Office Use only: | | | |
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| Ref | | | |

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 |
|---------|----------|-----------|-----------|--------|------------|

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 been designated a 'principal town', setting it alongside the more urban areas of Keighley and Bingley. As the smallest of the three locales, it is difficult to compare the requirements of Ilkley with the other proposed principle towns. Ilkley is not a centre for employment and is recognised as a commuter town within the plan itself (Section 2 Paragraph 52). Situated as it is on the edge of the Bradford district it is difficult to argue that Ilkley would be considered to have the same growth requirements of the two towns of Bingley and, in particular, Keighley.

The demographics of Wharfedale (and Ilkley in particular) are significantly different from the rest of the district, with a lower population growth and higher median age (47 compared to 34). In addition, Ilkley has higher house prices, and limited brownfield sites that are available for redevelopment.

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

