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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	MRS	
First Name	████████	
Last Name	SADLER	
Job Title (where relevant)	████████████████████	
Organisation (where relevant)		
Address Line 1	████████████████████	
Line 2	████████████████████	
Line 3	ILKLEY	
Line 4	WEST YORKSHIRE	
Post Code	LS29 ██████	
Telephone Number		
Email Address	████████████████████	
Signature:	████████████████████	Date: 26th 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	VARIOUS	Paragraph	VARIOUS	Policy	VARIOUS
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes		No	NO
4 (2). Sound	Yes		No	NO
4 (3). Complies with the Duty to co-operate	Yes		No	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 planning reasons and principles conflict with the National Planning Policy on preserving the Green Belt and the best and most versatile farmland it encloses; that there is no corresponding infrastructure planned to deal with the consequences of extensive new housing developments i.e. there is no new school planned to deal with the increased numbers already at an overcrowded and oversubscribed Ilkley Grammar School. That both Bradford and Leeds Councils have recognised that the A65, the only road in and out of Ilkley, is already congested and at over capacity; there is no, or little scope for longer trains or platforms and peak time trains are already congested, parking is already at a premium.

To develop new housing on this wonderful greenbelt area is to destroy a lifetime of rural beauty which is viewed as the Gateway to the Dales and beyond. It is an area of outstanding beauty. The Core strategy conflicts with the NPPF and policies do not comply with some paragraphs in the NPPF.

Paragraph 14 - adverse impacts significantly and demonstrably outweigh benefits and specific policies indicate development should be restricted.

Par.28 - it does not support development and diversification of agricultural and other land based rural businesses or rural tourism and leisure developments.

Par 37 -no balance of land uses - only 5HA employment land allocated. No jobs in Ilkley for a large influx of families, children and parents.

Par47 - no mechanism to enforce affordable housing requirement and there is certainly a need for this. A report a few years ago by the Rural Housing Enablers on Housing Need in Ilkley concluded that between 9.1% and 12.9% of the population identified a housing need.' There have been a number of large housing developments halted in Clifton and Bolling Road, - market forces indicate that the market is satiated.

Par 48 no allowance for windfall sites (i.e. 972 units granted planning permission in Ilkley in the past ten years provides compelling evidence required).

Pars 52/4 No cooperation with neighbouring communities to develop New Towns or garden Cities.

Par 77 no sufficient choice of school places planned or plans to expand, create or alter secondary schools.

Pars 80,81 & 82 Greenbelts should only be altered in exceptional circumstances.

Par 111 minimal consideration of using Brownfield land.

Par 112 best and most versatile land in Coutances Way earmarked for housing development.

Par120 minimum regard payed to pollution effects of waiting traffic on Coutances Way, plus the land north of the Railway Line is nationally known for ringslip problems.

Par 128 heritage assets and their setting - the only appropriate setting for the Georgian farmhouse off Coutances Way is on a farm not on a housing estate.

Par 158 full account not taken of market signals, Firstly a number of large developments in Ilkley have been halted for some time so this may be a signal of overdevelopment in this area. Secondly Bradford's initial document is replete with evidence that Bradford is a particularly deprived District in places with 42% of residents living in areas that fall into the 20% most deprived nationally and 5% living in areas that are among the 1% most deprived. Overall, two-fifths of people live in some of the most deprived areas in the country, 34% on very low incomes, 19% claiming key benefits, unemployment is higher than average and weekly wages are almost £80.00 less than the national average. There are a high proportion of people without qualifications (21.8%: 13.8% nationally). Household income in places like Little Horton averages £22,000. There is simply no way that the overwhelming majority of people in Bradford will be able to afford the type of housing that will be built in Ilkley - at £300,000 plus. Bradford cannot therefore claim that building executive type homes in Ilkley is a correct response to deal with the population increase in the areas where it is occurring.

**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.**

**PLEASE SEE ABOVE:** We do not consider that the Plan complies with the Duty to co-operate with the public. The documentation is so extensive and complex, which combined with the way the Council is requiring a separate form for every Section, Paragraph and Policy commented on is in our view deliberately designed to ensure a minimum response and put off ordinary members of the public who do not have specialist knowledge and time to do this. That is certainly what we have found when talking to people in Ben Rhydding.

At the outset while opposing a number of the policies in the plan we do support the need for a Development Plan to be in place as soon as possible.

In general we oppose those aspects of the plan which conflict with National Planning Policy on preserving the Green belt and the best and most versatile farmland it encloses; that there is no corresponding infrastructure planned to deal with the consequences of extensive new housing developments – i.e. there is no new school planned to deal with the increased numbers at an already overcrowded and oversubscribed Grammar school, that both Bradford and Leeds Council’s have recognised that the A65, the only road in and out of Ilkley, is already congested and at over capacity; there is no, or little, scope for longer trains or platforms and peak time trains are already congested, parking is already at a premium, the town’s medical centre cannot take another 3,000 patients etc. More detailed objections are developed below.

In the first instance we oppose the designation of Ilkley as a Principal Town as unjustified. Apart from the fact that it is only a fraction of the size of other places in the District, such as Kelghley, or even Shipley, which are deserving of the designation as Principal Towns the fact that the whole town is within 2.5 Kilometres of the Habitats Protection Zone means that the scale of development proposed together with the strain on related infrastructure, both existing and required, can be considered as overdevelopment. Therefore it conflicts with:

Please see above

*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?**

<b>NO</b>	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:**

Section 3, Paragraph 60;  
 Remove Ilkley from the list of Principal Towns  
 Add Ilkley to the list of Local Service Centres and Rural Areas  
 Outcomes :- Remove Ilkley from second Row and add to fourth row Outcomes.

Include in the Principal Policies and Statements that in accordance with the NPPF that settled Green Belt boundaries, which also includes the best and most versatile farmland, will be protected from development.

*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:

26th March 2014

**Core Strategy Development Plan Document (DPD) : Publication Draft**

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

