



For Office Use only:		
Date		
Ref		

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	Armitage	
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:	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.

For Office Use only:			
Date			
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	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<input type="text"/>
---------	----------------------	-----------	----------------------	--------	----------------------

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4 (2). Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

Paragraphs 80, 81, 82 in the NPPF state explicitly that Greenbelt boundaries should only be altered in exceptional circumstances. The plan does not provide sufficient proof to justify these exceptional circumstances.

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	15.3	Policy	
---------	---	-----------	------	--------	--

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	<input checked="" type="checkbox"/>
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.

It is accepted that adequate and sufficient infrastructure (schools, roads, rail links, health care, amenities, parking) need to be in evidence to support proposed housing developments. However, the local infrastructure plan from October 2013 does not identify sufficient improvements in the infrastructure to support the plan. At the present time all local primary and secondary schools are full, the main A65 is severely congested at peak times and no by pass or road widening is deemed possible, parking within the town is already at a premium and rail services are already congested at peak times with again no scope for increasing capacity.

Date			
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	5.3	Paragraph	64	Policy	H03
---------	-----	-----------	----	--------	-----

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	✓ <input type="checkbox"/>
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 plan identifies a need for 800 new homes, which requires building on three tranches of greenbelt land. There is no clear justification for the figure of 800 homes, or explanation of where it has been derived from. In addition, the quantified windfall of 500 new homes which have been constructed over the last 9 years should be accepted as relevant in the overall requirements, and is not considered in the plan.

Date			
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		No	
4 (2). Sound	Yes		No	✓ <input type="checkbox"/>
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 plan designates Ilkley as a principal town. The strategy has not been objectively assessed as it is not reasonable to designate Ilkley alongside towns such as Keighley, as principal towns are required to have facilities such as a hospital, a functional town hall and an operational police station. In addition, Ilkley is not a place of significant employment as most people commute.

For Office Use only:			
Date			
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		Paragraph		Policy	
---------	--	-----------	--	--------	--

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	<input checked="" type="checkbox"/>
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 proposed housing requirement does not take full account of market signals. A number of large developments in Ilkley have been halted for some time, suggesting that overdevelopment has occurred in the area. Secondly, the documents produced by Bradford initially highlight that it is a particularly deprived district with low incomes, higher unemployment than average and a high proportion of people without qualifications. Hence, the type of housing which will be built in Ilkley (executive type £300K plus properties) will be unaffordable and hence unsuitable for the population increases predicted.

For Office Use only:

Date			
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		Paragraph	80, 81, 82	Policy	
---------	--	-----------	------------	--------	--

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	
4 (3). Complies with the Duty to co-operate	Yes		No	✓ <input type="checkbox"/>

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 entire plan document, and the documentation and process provided for comments on the plan, have been specifically designed to be as complicated and un user friendly as possible and hence minimise representation. This does not comply with the duty to co-operate.

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 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:

[Redacted Signature]

Date:

25/3/14

