



For Office Use only:		
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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	Green	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
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: 30/03/14

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	various	Paragraph	various	Policy	various
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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 believe the plan is unsound for the following reasons:

- The development requirements have not been objectively assessed. GVA, the company which undertook Bradford's Requirement Study (Feb 2013, referenced in Para 5.3.6 of the Plan), also markets land for residential property development and in particular has marketed one of the areas of greenbelt land in Ben Rhydding which has been ear-marked for development. GVA clearly has a conflict of interest and cannot therefore be relied on to provide an objective assessment of residential housing requirements.
- The designation of Ilkley as a principal town is not justified. It is one third the size of Keighley, it is not an employment centre, most administrative council services have been removed and there are no emergency medical facilities. (Section 3, para 60, policy SC4).
- It is not consistent with the National Planning Policy Framework which states that green belt boundaries should only be altered in exceptional circumstances: 55% of the 800 houses planned for Ilkley are to be built on green belt land when inadequate consideration has been given to brown field sites in the Bradford district. I note that Planning Minister Nick Boles recently wrote to parliament stressing the importance of bringing brown field land into use and made clear that authorities do not have to allocate sites on the basis of providing the maximum possible return for landowners and developers.
- The local infrastructure is not capable of supporting an additional 800 homes in Ilkley either now or as proposed in the existing local infrastructure plan. The A65 is already over capacity and local schools are already hugely oversubscribed.

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 re-worded such that Ilkley is re-designated from a Principle town to a local service centre and the plan re-drafted accordingly.

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:

[Redacted Signature]

Date:

30/03/14

Core Strategy Development Plan Document (DPD) : Publication Draft

