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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)
<b>Title</b>	Mrs	
<b>First Name</b>	████	
<b>Last Name</b>	Kealey	
<b>Job Title</b> <small>(where relevant)</small>		
<b>Organisation</b> <small>(where relevant)</small>		
<b>Address Line 1</b>	████████████████████	
<b>Line 2</b>	Ilkley	
<b>Line 3</b>		
<b>Line 4</b>		
<b>Post Code</b>	LS29 █████	
<b>Telephone Number</b>	████████████████████	
<b>Email Address</b>	████████████████████	

<b>Signature:</b>	████████████████████	<b>Date:</b>	30/3/14
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#### 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	
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**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.**

Greenbelt. Para 80 (NPPF) states that the role of Greenbelt is “to prevent neighbouring towns merging into one another” and “to assist in safeguarding the countryside from encroachment”. The building of 800 houses along Coutance Way will almost join Ben Rhydding to the outskirts of Burley. It also states a purpose is to “assist in urban regeneration by encouraging the recycling of derelict and other urban land.” There are many identified Brownbelt sites in the urban areas of Bradford, an area where the housing shortage has been identified. There are also many boarded up and derelict houses near the city centre. These areas could be regenerated and made into desirable properties near the main city centre. Para 83 states explicitly that “once established, Greenbelts should only be altered in exceptional circumstances.” The plan does not provide sufficient evidence to justify these exceptional circumstances or seem to have looked at the viability of “the recycling of derelict and other urban land”.

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**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	

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Local infrastructure In order to support proposed housing development, it is accepted that adequate and sufficient infrastructure (schools, roads, rail links, health care, amenities, parking) needs to be in evidence. However, the local infrastructure plan from October 2013 does not identify improvements within this infrastructure to support the plan.

Schools. At this time all local primary schools are full with many classes operating at over 30 children. The secondary school is full with no room to take more children. Section 4.3.2 states “a new secondary school for the town has provided excellent accommodation for the young people of the town”. Ilkley Grammar School, founded in 1607 remains on the original site, as the plan to rebuild it was scrapped 3 years ago.

Transport. The main A65 is severely congested at peak times and no by pass or road widening is deemed possible. The centre of Ilkley often proves a problem area with queuing traffic. In the town centre there is already inadequate parking available with no space to expand on this. The train services are congested at peak times again with no scope for increasing capacity because of the old stations and congestion in and out of Leeds. Increased traffic and congestion in Ben Rhydding would endanger the lives of children needing to cross the main road to the A65 on their journey to school.

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Section	5.3	Paragraph		Policy	
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**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	

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A need has been identified for 800 new homes in the Ilkley area, which requires building on three sections of greenbelt land. There is no clear explanation of where the figure of 800 new homes comes 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, therefore reducing the total of new homes needed. This is not considered in the plan.

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Section	5.4	Paragraph	150	Policy	
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**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	

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Flooding. Section 5.4.150 states “As climate change increases the probability of flooding....assessment of potential of land within high risk zones 2 and 3A.... and safeguarding these areas from development.” Yet, the map in the same document appears to show part of the designated building area on Coutances Way in or on the very edge of a zone 3A flood plain. Having lived in the area for 13 years, the area of Coutance Way alongside the A65 if partially flooded most winters.

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**4. Do you consider the Plan is:**

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

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Duty to cooperate The whole process of being able to make representation does not comply with the duty to cooperate. The entire planning document and the documentation and process provided for comments on the plan seem to have been designed to be as complicated and non-user friendly as possible, thereby putting many people off, or unable to make a representation. The original document is very difficult to find your way around. The form itself was difficult to fill in as it was almost impossible to copy extra section 5's as requested to do.

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Ref	<input type="text"/>		

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**3. To which part of the Plan does this representation relate?**

Section	various	Paragraph	various	Policy	
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**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	

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Market Signals. As a number of larger developments have been put on hold in the Ilkley area, this suggests overdevelopment of the area. Next, the Bradford documents highlight how Bradford has higher than average unemployment, lower incomes with a high proportion of people with no qualifications. The building of the new houses on the outskirts of Ilkley would not meet the needs of these people seeking affordable homes. The demand for new homes for urban Bradford would not be met by further development of the Ilkley area.



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.

Use of Brown belt and refurbishment. Areas of brown belt and existing empty, boarded up or derelict housing in urban Bradford should be properly considered and cleared for building/refurbishment, therefore, providing homes where the demand arises with easy access to the main employment centre of Bradford City Centre. The investment should be made into the regeneration of Bradford centre and making it a safer, more pleasant place to live and spend leisure time. The Green belt should not be considered simply as an easier, cleaner and, therefore, cheaper option.

If there is a need for 800 houses in Ilkley, the 500 already having been built by developers in the area should be taken into consideration. If there is still considered a need to build in Ilkley, the transport system ie A65 and rail and bus services need to be properly analysed to see if they are capable of carrying the increased volume. A study of class sizes and waiting lists for children in all primary and secondary schools should be carried out before any such housing expansion is planned to see if these schools can facilitate more children.

4.3.2 Error. There is no new secondary school in Ilkley and no new provision of sports centre facilities to be used by the local community.

*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:

30/3/14



