



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	██████████	
Last Name	Duff	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	████████████████████	
Line 2	Ilkley	
Line 3	West Yorks	
Line 4		
Post Code	LS29 ██████	
Telephone Number	████████████████████	
Email Address	████████████████████	
Signature:	██████████ (signed)	Date: 28 th 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	5.3	Paragraph	64	Policy	HO3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	Yes	No	
4 (2). Sound	Yes		No	No
4 (3). Complies with the Duty to co-operate	Yes	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.

Soundness - Positively prepared – Need

The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements..

Housing allocations for Ilkley and Wharfedale do not represent the needs and priorities of its community as envisaged in National Planning Policy Framework (para 155).

The Core Strategy Development Plan proposal to build 800 houses in Ilkley is based on the desire to raise as much council tax as possible rather than any formal assessment.

A nationally set target has simply been allocated throughout the district with no regard to local need or where this might arise in future.

The population of Ilkley has remained fairly constant at approximately 14,000. However, assuming each new property contains an average of three occupants, the total will increase by 2,400 or almost 20%.

This is in addition to the housing proposals for Menston and Burley, plus neighbouring Aireborough and Otley.

On-going 'windfall' development, which has added hundreds of new houses over the past few years, has also been excluded. This is contrary to the written ministerial statement by Nick Boles on 6th March 2014 when referring to planning practice guidance, making clear that windfalls can be counted over the whole local plan period.

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.

Large scale housing development is justified in areas of population growth, such as within the city of Bradford itself close to work opportunities, especially given the construction of new shopping facilities in the city centre and other initiatives likely to act as a catalyst for expansion.

The Plan should therefore consider the building of significantly fewer houses in Ilkley itself given these are neither needed or wanted.

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

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] signed

Date: 28th March 2014

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

