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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	Brown	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████ ████████████████████ ████████████████████ ████████████████████	
Line 2		
Line 3		
Line 4		Ilkley
Post Code	LS29 ██████	
Telephone Number	████████████████████	
Email Address	████████████████████	
Signature:	████████████████████	Date: 28/03/14

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	3	Paragraph	60	Policy	SC4
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	No
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 consider the decision to designate Ilkley as a 'principal town' is not justified. This designation is at odds with the size and nature of the town and unique character of the area. Ilkley is one-third the size of Keighley with a population of less than 3% of the Bradford District total and has no hospital or emergency medical facilities. Most administrative council services have been removed from the Town Hall with its opening times restricted to Tuesday mornings by appointment only.

It is clear to see from the contradictions between the Local Infrastructure Plan (LIP) and the Growth Assessment Principal Towns (GAPT) document how designating Ilkley as a Principal Town distorts the facts for the sake of promoting development in line with that expected of a Principal Town. For example the LIP describes the real situation with regard to the constraints on school places experienced by many parents in Wharfedale as 'acute' (p39) and an infrastructure issue 'that could pose significant challenge to delivering growth' (LIP, para 5.5.1). However the GAPT says 'New housing may provide new and enhanced education and open space facilities.' (p41). This is despite Ashlands Primary School increasing its intake capacity this academic year in line with LIP recommendations and being acknowledged in the LIP as the only school in Ilkley able to do so. The LIP also identifies that 'The majority of the demand for new school places is being generated by the population living in existing housing' (LIP, p101). Given the physical constraints of the existing school buildings in Ilkley and there being no indication of any future investment to alleviate this situation it can only become worse. The reality is a painful position to experience as a parent with further development only exacerbating the problem for other families in future which does not support sustainable development as outlined in the Plan. For example we live 0.47 miles away from Ben Rhydding Primary School and even though it was our first choice and we are within the 'Priority Catchment Area', due to oversubscription from families in existing houses, we could not secure a place for our son to begin in Reception for the start of the academic year 2013. A number of other neighbours had also not been able to secure places at Ben Rhydding Primary School, in one case being required to drive their children seven miles away to a primary school in Silsden.

With regards to the nature of the town it is identified within the Plan as being one of a small number of key heritage sites that have been 'strengthened as tourist destinations, whilst supporting the needs of their resident communities and protecting and enhancing what makes these places so special'. (Section 3, para 3.10) In addition it is seen as more of a commuter base (Section 2, para 52) but one which already experiences serious overcrowding on trains for commuters with little scope for increasing capacity and is identified as a serious infrastructure issue (LIP, 5.5.1). The implications the 'Principal Town' designation, and the overdevelopment and strain on infrastructure it would burden Ilkley and Ben

Rhydding with, are in contradiction to the requirement in the NPPF for Local Plans to meet objectively assessed needs (Para 14) unless

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

Given that the whole of Ilkley comes within the 2.5km habitats protection zone it is clear that development of the volume allocated to a 'Principal Town' is inappropriate and there are policies in place to restrict such expansion. These are especially important given the pressure from developers wanting to benefit from building houses that on average fetch £340,000 compared with £140,000 in the rest of the District. This is an opportunity the company which undertook Bradford's 'objective' Housing Requirement Study (Feb 2013 - referenced in Para 5.3.6 of the Plan) and Housing Requirement Addendum Final Report (Aug 2013) are clearly keen to exploit as evidenced by their seeking to market a key area of 17.6 acre Ben Rhydding green belt only one month before they were commissioned to begin the first of these studies in August 2012 (www.gva.co.uk; Property 4633). Significantly, if the green belt restrictions on this site were lifted and the proposed development to take place, families in most of the new houses would be further away from Ilkley schools than we are and like us may face an eight mile return drive every day to school thereby also increasing the strain on an already overburdened road network.

Ilkley has a unique place in the economic, social and environmental life of the District but arguably one that has more in common with other popular tourist destinations, such as Haworth, as opposed to larger areas like Keighley which have the potential for benefitting more from 'Principal Town' development.

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 needs to be modified to take into account and protect the small size, nature and unique character of the town by removing Ilkley's designation as a Principal Town. This will make the plan sound in this respect as it will be a justified strategy consistent with sustainable development in accordance with national policy. I suggest the following revised wording:

- (Section 3, Para 60, headed Principal Towns, A and B) should have Ilkley removed from the list of Principal Towns and roles.
- (Section 3, Para 60, headed Local Service Centres and Rural Areas) should have Ilkley added to the list of Local Service Centres.
- (Section 3, Para 60, headed Local Service Centres and Rural Areas, Outcomes) remove Ilkley from the second row of Outcomes.
- (Section 3, Para 60, headed Local Service Centres and Rural Areas, Outcomes) add Ilkley to the fourth row of Outcomes.

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:

Date:

28/03/14

Core Strategy Development Plan Document (DPD) : Publication Draft

