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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	5	Paragraph	5.3.61	Policy	HO3
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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 build 800 new homes in Ilkley over the life of the Plan is neither justified nor consistent with national policy.

While I welcome the positive measures in the Plan for minimising green belt releases, supporting green infrastructures, protecting habitats, minimising additional travel arising from development and boosting tourism I consider the proposed number of new homes for Ilkley does not support these aspirations. This would mean that over half of the proposed homes would need to be built on green belt which is more than double the requirement for the rest of the District. This is in part due to there being few derelict or brownfield sites, with the exception of the area taken up by a delayed Tesco expansion, and no consideration being given to the large amount of development already taking place or future windfall opportunities.

The NPPF attaches great importance to green belts (Para 79) and states they should only be 'altered in exceptional circumstances' (Para 83). It also regards sustainable development as that which ensures better lives not just in the present but for future generations which this level of development would endanger. Given that the whole of Ilkley comes within the 2.5 km habitats protection zone it is not clear why the total of 800 new homes remains given the destruction of the green belt needed to achieve this and the detrimental burden this would place on the town's character, economy and already overloaded infrastructure.

The Plan states in (Section 3, para 15.3) that the spatial vision for Bradford will be achieved through a number of objectives including the following: 'Ensure that the appropriate critical infrastructure (including green and social) is delivered to support growth and the timing of development and infrastructure delivery are aligned'. However Ilkley has a number of critical infrastructure issues that need addressing yet are already acknowledged be highly challenging if not practically insurmountable, and having little if any funding allocated to addressing the issues.

Our personal experience as parents bears out the critical state of school places in Ilkley highlighted within the Local Infrastructure Plan (LIP). Even with expanding Ashlands Primary School this still does not solve the issue for Ben Rhydding (East) families. 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. 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. We now face an eight mile return drive each day to school.

Our school run flies in the face of policy TR1 in the Plan which aims to reduce the need to travel (Para 5.2.13) and if green belt in Ben Rhydding (East) is built on would be exacerbated multiple times as families in new homes find there are no catchment area places for them. This would then cause families to place extra pressure on the A65 which studies have shown to be congested, yet the LIP has no plans to address this and given the built up nature and cultural value of the properties the road passes through would be unable to anyway. Even at weekends the A65 is so congested throughout Ilkley that we only use it as a last resort yet the Plan proposes attracting extra tourists in addition to many new families. In addition to strain on the local roads the building of 800 houses in this commuter town would also add further overcrowding to the very limited rail transport capacity, another issue acknowledged in the LIP as significantly challenging (LIP, 5.5.1) and one my husband has experienced on a daily basis commuting to Leeds.

A further area of significant concern within the LIP is regarding flood risk and drainage (LIP, 5.5.1). As a local resident it is only too apparent how flooded the lower of the two pieces of land identified in the SHLAA Update Report (May 2013: Map IL/014) for Ilkley gets at various times of the year. I therefore do not understand how development of this site in flood zone 3b is compatible with the Plan's statement that 'the SHLAA has, in line with the definitions within the NPPF, ruled as unsuitable any site falling within flood zone 3b, the functional flood plain' (5.3.4). If housing development is not allowed here then it puts pressure on building on other green belt areas such as (SHLAA, May 2013: Map IL/009) which is the area near to us in Ben Rhydding (East). This would cause most of the new families in this development to be in the same situation regarding primary school places as we and a number of our neighbours have been in given there is no further educational infrastructure development planned. This is not a situation in keeping with the NPPF's aims of sustainable development.

Wharfedale, and Ilkley in particular, has a distinct contribution to make to the District economically, socially and environmentally but arguably as a Local Service Centre not a Principal Town. This is not least because of its proximity to the Yorkshire Dales National Park and Nidderdale Area of Outstanding Natural Beauty. This creates a unique environment that would be compromised by the scale of the proposed development. (Section 5.3, para 62). In addition Ilkley and Ben Rhydding are among the least deprived areas of the country whereas Bradford is ranked as the 2nd most deprived area in Yorkshire and Humberside (Section 2, para 33). There are also significant differences in the demographics for the areas showing Ilkley as having an older population with slower growth than the District in general. It would appear to make sense therefore for practical, cultural and environmental reasons to support large scale development in areas like Keighley or Bradford that need and have the space and infrastructure to benefit from such investment.

- 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.**

1. Remove Ilkley's designation as a Principal Town and make it a Local Service Centre with the more sustainable level of development associated with such a designation.
2. Protect the green belt as a major element of what makes the area special as well as protecting precious habitats, wildlife and the tourism economy.
3. Given the intractable problems associated with major areas of infrastructure, not least education, reduce the number of proposed houses from 800 to cover only those it is possible to build sustainably through windfall and brownfield sites over the life of the Plan.

*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

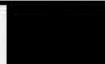
No, I do not wish to participate at the oral examination

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**

