

Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012

Publication Draft - Representation Form

Monday 17th February until Monday 31st March 2014

This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:
www.bradford.gov.uk/ldf.

For further information you can contact the Local Plan Group by:

- **Emailing us at:** ldf.consultation@bradford.gov.uk
 - **Phoning us on:** (01274) 433679
-

Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- **Part A** – Personal Details
- **Part B** – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- **Part C** – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

Please return this completed representation form to the Local Plan Group by either:

- **E-mail to:** ldf.consultation@bradford.gov.uk
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,
2nd Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

**For your representation to be 'duly made' the Council must
receive it no later than 5pm on Monday 31st March 2014**

For Office Use only:

Date		
Ref		

Core Strategy Development Plan Document

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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	Brown	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Ilkley	
Line 4	[REDACTED]	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 26/3/2014

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.

For Office Use only:
Date
Ref

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

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.

The Soundness of the plan:

Positively Prepared

There is a plan for an additional 800 homes in Ilkley over the life of the plan, however the basis upon which this is assessed appears arbitrary and the principles applied are inconsistent. Arbitrary because the baseline figures and starting point for distribution of additional housing appears to have been prepared by reference to the current area populations rather than any assessment of the specific housing need of the particular areas.

The plan also appears inconsistent, for example, the 10 principles as set out in HO1 state inter alia:

- 1) To distribute housing growth in a way which reflects accessibility to jobs and services;
- 4) Housing Growth should be coordinated with infrastructure; and
- 7) There is a need for affordable housing.

However, the plan at 5.3.46 discounts transport infra structure as a reason to reject a site for development, further at 5.3.47 educational needs are also discounted. This position is contradictory and fails to have regard to Policy HO7 G1,2 and for the individual transportation (infrastructure) needs of particular areas, transport of course being tied to the accessibility to jobs and services.

A further 800 additional homes in Ilkley will have a major and disproportionate impact on the local transport network. The additional journeys, recognising that much of Wharfedale community commute to the central urban centres (SC4 Section 2 Para 52), will be unsustainable and are not consistent with minimising additional travel from

developments. The A65 route through the Wharfdale corridor and the A660 are both severely congested, and there are few opportunities to increase highway capacity. Further, the railway network is already severely overcrowded during peak hours and there is little, if any, capacity to increase this due to the length of the platforms and sections of single track on routes to both Leeds and Bradford. The travel issues will not be limited to commuters, but also the parents and carers undertaking the 'school run' and also those children taking the train to get to and from school.

Justified

Ilkley, albeit being defined as a principal town, has a population of less than 3% of the Bradford District Total and is one third the size of Keighley. As indicated above, this area is recognised as a commuter area and therefore transport links are vital. Equally the plan, whilst taking the starting point of allocating the increase in development as against the proportion of the population in each area does not also take into account other area specific demographics e.g. average age (Ilkley 47, district 34) or housing costs (Ilkley £340,000, District £140,000) and the district population growth is 50% greater than in Ilkley. As the house prices in the district as a whole are roughly 41% of those in Ilkley they will not be affordable to a significant proportion of the district. Further, this plan does not take into consideration the additional 500 homes already built in the Ilkley area.

Whilst Ilkley has been designated a principal town, alongside Keighley and Bingley, it remains the smallest of the three areas. It is therefore difficult to state that Ilkley has the same growth requirements as either Keighley or Bingley. Indeed their transportation links are superior, their housing costs lower and these areas are and remain a centre for employment whereas Ilkley has an economy based mainly as a key tourist destination.

The primary reason why Ilkley is a significant tourist destination for Bradford District is its situation, being separated from the district by the Moor and its close proximity to the Yorkshire Dales and Nidderdale. A further 800 hundred homes in the Ilkley area, with the release of green belt sites, runs contrary to Policy HO7 G4 generally and will not have a positive effect on tourism, indeed quite the reverse, it will deter visitors due to the high volume of traffic, the limited parking and reduction in the heritage value of the surrounding countryside if development takes place on the green belt.

At 5.3.91 the plan acknowledges that green belt sites will be required to be utilised, again however the plan discounts a further increase in development in Bingley at 5.3.62 on the basis that *'there is also a need for the strategic functioning of the green belt in the area is not compromised'*. This approach appears at odds with that taken towards Ilkley as the risk of 'ribbon development' is high in order to satisfy the 800 houses, this will result in a loss of character within the Wharfdale community and the lack of the individual nature of each village and town. This loss will also severely affect the tourism industry in each town and village.

Consistent

Ilkley sits at the edge of the district and is a key tourist destination for the area. It is principally towns akin to Ilkley which the National Planning Policy Framework at para 80 recognises the importance of when it sets out an aim *"to prevent towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns and; to assist in urban regeneration by encouraging the recycling of*

derelict and other urban land".

In respect of the Ilkley area, a total of 800 homes will be from Green Belt releases, but this is against the approach as set out (section 3 - paras 103-116, policy SC8). This will not minimise green belt release, does not value green infrastructures, protecting habitats, minimising additional travel arising from development and boosting tourism.

Ilkley is entirely based within Zone B of the Zone of influence of the South Pennine Moors; building 800 additional homes in this area, with the associated reliance on the use of green belt sites is wholly inconsistent with protecting the Habitats Regulations Assessment (HRA), this reduction is only 36% and is both inconsistent with the reduction across Wharfedale and lacking justification in the document and seems arbitrary.

- 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.

Proposed Modifications:

Whilst I acknowledge that there is a need for additional housing in the Bradford District Area, it is difficult to see how the infrastructure e.g. schools, shops, public and private transport may sustain such a rapid increase in the population of Ilkley. Further the need to support and increase tourism in the Ilkley and Wharfedale areas can not be supported with the current plan, which would serve to reduce the level of green belt land in the area.

A smaller number of properties in the Ilkley area could potentially be sustained, but without the associated investment in infrastructure it remains difficult to assess. Given that a further 500 homes have already been built I would propose no new houses in the Ilkley area and a general reduction

The shortfall in housing development across the district as a whole should be re-focused on areas of real and significant growth i.e. Keighley and Bradford and Bingley, in which there are significant volumes of brownfield sites to be effectively redeveloped. Equally such areas have the capacity to accommodate the required transportation need that such housing would require either via road or railway, as they have the benefit of a frequent service to Shipley and therefore access to the entire district. Further those areas also benefit from existing significant local amenities.

This approach will ensure that the plan is positively prepared, justified, consistent and therefore sound.

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:

26/03/2014

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

Please place an 'X' in the appropriate boxes.

