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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		
First Name	██████████	
Last Name	Galloway	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████	
Line 2	Ilkley	
Line 3	West Yorks	
Line 4		
Post Code	LS29 ████████	
Telephone Number	██████████████████	
Email Address	██	
Signature:	██	Date: 28 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		No	
4 (2). Sound	Yes		No	x
4 (3). Complies with the Duty to co-operate	Yes		No	x

**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 housing allocation for Ilkley presented in the Core Strategy Development Plan Document (800 homes) is excessive and unwarranted.

There is no data to support how need for 800 homes in Ilkley was calculated, or indeed if it is still current in light of the changing economic climate.

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, yet this is not considered in the plan.

Ilkley is a commuter settlement rather than an employment centre so the scale of new housing allocation is not adequately explained, nor is it supported by growth in employment or development in local infrastructure. The low level of business premises increase proposed would not support the proposed number of new homes, thus further exacerbating commuter problems in the Wharfedale corridor.

The proposed housing requirement does not take full account of market signals. A number of large developments in Ilkley have been halted for some time, suggesting that overdevelopment has occurred in the area. If, for example, Tesco is not planning to build on the prime brownfield site in the near future, then the land should be brought back into the equation and considered as a suitable brownfield site if need for extra housing is proven in Ilkley.

Increasing housing without further investment in road and rail improvements will further exacerbate the transport problems identified elsewhere within the plan. It is not enough for the plan to say that a suitable transport solution was not easily seen so, therefore, it can be ignored when devising the housing allocation across the district.

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Section	5.3	Paragraph	64	Policy	HO3
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**4. Do you consider the Plan is:**

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

**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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Some 55% of the housing allocation in Ilkley is located in the green belt. This is a much larger loss of green belt than that proposed in the rest of the district, yet Ilkley has a rural character compared with an urban character in other areas of the district.

Paragraphs 80, 81, 82 in the NPPF state explicitly that Greenbelt boundaries should only be altered in exceptional circumstances. The plan does not provide sufficient proof to justify these exceptional circumstances. Thus the proposed loss of green belt is contrary to the principles of the National Planning Policy Framework 80, 81 and 82.

The loss of the green belt will negatively impact the town's tourism and leisure aims.

Statements in Section 3.101 and policy SC7 need to be checked to ensure the plan is actually going to deliver what it is setting out to do in terms of green spaces for the district.

The areas of brownfield land should be examined further to ensure it is used first. Plus any derelict or unused housing stock should be brought back into use before any extra building is undertaken.

The Council should use its jurisdiction to ensure the 'right' thing is done to regenerate areas rather than going for the 'easy' option of new builds.

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

Section	3	Paragraph	101	Policy	SC5 SC6
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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 checked="" 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. 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 plan seems to be contrary to its own objectives of retaining green spaces across the District.

The whole plan is written in a way, and the comment process is so convoluted to get through, that the average lay person would give up. It is only because some residents can see the many adverse impacts of this plan across Bradford that anyone will take the trouble to comment at all.

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

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

Section	<input type="checkbox"/>	Paragraph	<input type="checkbox"/>	Policy	<input checked="" type="checkbox"/>
	various		various		SC4 HO

**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 checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input 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 plan designates Ilkley as a principal town. The strategy has not been objectively assessed as it is not reasonable to designate Ilkley alongside towns such as Keighley, as principal towns are required to have facilities such as a hospital, a functional town hall and an operational police station. In addition, Ilkley is not a place of significant employment as most people commute.

Schools in the area are already oversubscribed, with new families moving into Ilkley not being allocated schools closer than Silsden. Adding more homes without any increase in school provision would be adding more problems into the area. This is not a good example of holistic or joined up thinking. Data relating to a new secondary school with improved sports facilities is wrong: no such school was built.

Data needs to be checked very carefully throughout the whole document before decisions are made based on inaccurate and out-of-date information.

**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.**

To make the plan sound there needs to be a reduction in the proposed housing allocation, and any final allocation needs to be made based on a sound assessment of need, infrastructure availability and to be compliant with the policies relating to Greenbelt within the NPPF.

The areas of brownfield land should be examined further to ensure it is used first. Plus any derelict or unused housing stock should be brought back into use before any extra building is undertaken.

The Council should use its jurisdiction to ensure the 'right' thing is done to regenerate areas rather than going for the 'easy' option of new builds.

After proper analysis, should extra homes be required, then adequate provision should be made for infrastructure to support this e.g. schools, transport, access to hospital facilities.

All data used within the plan should be rigorously checked. Information relating to a new school already built within Ilkley (4.3.2) is blatantly wrong.

The plan should be redone in an easy-to-use format with people able to comment using mobile devices. Or, better still given the diverse nature of Bradford's population, have drop-in sessions where comments can be made orally and recorded by staff in a suitable manner.

*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?**

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination
<input type="checkbox"/>	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 March 2014