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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	Mr
First Name	[REDACTED]	[REDACTED]
Last Name	Lewis	Wright
Job Title (where relevant)		
Organisation (where relevant)		[REDACTED]
Address Line 1	[REDACTED]	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	[REDACTED]	[REDACTED]
Line 4	Ilkley	York
Post Code	LS29 [REDACTED]	YO41 [REDACTED]
Telephone Number		[REDACTED]
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: 31 st 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	<input type="text"/>	Paragraph	<input type="text"/>	Policy	SC1,SC2,SC3,SC4,SC5,SC6,SC7,EC3,H03,H07 AND WD1
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4 (2). Sound	Yes	<input type="text"/>	No	In so far as this representation proposes changes to the Plan
4 (3). Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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 issues of unsoundness relate to the robustness of the evidence base or the failure to comply with national policy or omissions which the evidence base would indicate material should be included.

A MORE DETAILED REASONING IS SET OUT IN SECTIONS 5 AND 6 BELOW. THE REPRESENTATION RELATES TO AN INTERCONNECTED SET OF CONCERNS THAT COVER THE SPREAD OF POLICIES IDENTIFIED AT SECTION 3 AND THEREFORE THIS IS PRESENTED AS A SINGLE REPRESENTATION.

1.0 Introduction

1.1 This consultation response is concerned with Strategic Policy and how that impacts on the provision and distribution of housing in the Wharfedale Sub Area.

1.2 The response acknowledges the overall provision for development land is appropriate and justified. The Core Strategy DPD is hereafter referred to as 'The Plan'.

1.3 Whilst the main thrust of Core Strategy is supported, the principal concerns raised in this consultation response are:

- That the promotion of sustainable patterns of development needs to expressly acknowledge the objective that the distribution of new jobs (in the form of employment land provision and distribution) needs to be closely related to the provision and distribution of housing, and
- That green belt should be protected to the greater degree, but also that protection should have

regard to the specific quality and function of areas of green belt in the appraisal of green belt releases.

- That the true function of Ilkley as a Principal Town should be clearly identified in the base evidence and development needs in relation to that function should be appropriately identified, having regard to the evidence base.

1.4 Specific reference is made to Policies SC1, SC2, SC4, SC5, SC6 & SC7 in respect of the strategic objectives.

1.5 Flowing from these strategic objectives, consequential concerns arise with regard to the distribution of development land in Wharfedale under Policies EC3 and HO3.

1.6 Separately, but in relation to the concerns expressed in respect of the Strategic objective issues arise in relation to WD1 and HO7.

2.0 The Strategic Concerns

Policy SC1

2.1 The objective of this policy is to achieve more sustainable patterns of growth and movement. SC1.B.10 indicates the aspiration of the sustainable pattern having regard to access to jobs and the earlier paragraphs reflect the settlement hierarchy of the partial revoked RSS. However the policy and its justification fall short of the expressed objective of RSS to distribute housing and jobs in a balanced form.

2.2 Secondly at SC1.B.5 the role of Ilkley is espoused as a Principal Town. The roles of Principal Towns are not explained at this point but the concerns with that approach are set out by reference to the concerns with Policy SC4 below.

Policy SC2

2.3 This policy set out measures to achieve sustainable objectives in the particular areas of climate change and resource use but it fails to flag up that an important factor in this process is achieved by the balanced distribution of jobs and housing and that factor should be expressly stated in the policy.

2.4 At SC2.B.2 the policy seeks to support opportunities to deliver such things as green infrastructure but the policy should equally set out the need to protect the existing elements that provide resilience.

Policy SC4

2.5 The settlement hierarchy is based so far as the selection of Principal Towns is concerned upon RSS and its underlying evidence base. The Settlement Study which underpinned the RSS was much criticised as a reliable and reasoned piece of work, having been outsourced by the Regional Body to North Yorkshire County Council.

2.6 The Settlement Study was at best a piece of work which lacked intellectual integrity, simplistic and based on a series of unsupported assumptions. Nevertheless the RSS set out a clear policy to define the roles of Principal Towns in RSS Policy YH5. No such policy is contained in the Core

Strategy and the RSS policy is revoked.

- 2.7 Further the commentary to the policy SC4 refers to the Principal towns as a focus for housing without setting out complimentary objectives for employment growth. That approach is at odds with the spatial framework of the RSS. It is therefore not justified to rely on the RSS evidence base when the purposes are not either the same or set out in specific policy.
- 2.8 The reference of Ilkley as a Principal Town is misconceived in that it is not a focus for the rural hinterland. That focus has always traditionally been Otley and/or Skipton. There is no requirement for Ilkley to be an employment hub and, accordingly, the housing provision should be reduced.

Policy SC5

- 2.9 It is both inappropriate and contrary to National Policy to provide that the sequential order should place loss of green belt before the allocation of urban extensions in sustainable locations. Such an approach is not legally compliant.
- 2.10 Secondly the release of Green Belt should not be resolved by the tests set out in the policy which should include a criterion that assess the importance of the area to be released in relation to the purposes of the Green Belt as a whole and in its specific location.

Policy SC6

- 2.11 This policy is strongly supported but the policy should require that all sites which are to be considered in the allocation process should be appraised against these criteria. That means not just the sites preferred but all sites that have been identified. This requirement should be enshrined in the policy.

Policy SC7

- 2.12 Any review should provide an outcome that gives long term security to the Green Belt i.e. 30 years protection not merely 15 years.
- 2.13 The reviews should also have regard to the local impacts of releases particularly where these may lead to the potential for subsequent releases that cumulatively would undermine the strategic purpose of the Green Belt. Thus the consequences for the strategic purpose of the Green Belt identified in SCSC7C should indicate that the assessment should not be limited to a consideration of the release itself but also the likely consequence for adjacent areas of Green Belt whose function and purpose may thereby be weakened or undermined.

3.0 The Distribution of Development.

- 3.1 Specific concern arises from the apparent lack of balance between the distribution proposed under Policy EC3 and that of HO3. As has been set out in respect of the concerns relating to the strategic policies in terms of the absence of a definite statement to achieve a balanced distribution between new jobs and new homes there is a specific imbalance in the distribution policies.
- 3.2 The concern here expressed is not one which relates to the quantity of the provision but is to its distribution within the geographical areas of Wharfedale.

- 3.3 Policy EC3 provides for 5 ha in the Wharfedale corridor. This represents 3.7% of the District wide provision.
- 3.4 Policy HO3 provides for 1600 houses in the Wharfedale corridor. This represents 3.8% of the District wide provision.
- 3.5 Although at first sight the distribution appears to be balanced 0.1% of the housing provision represents 42 houses which is 2.6% of the Wharfedale allocation and in these locations represents a site which would otherwise have to be provided from Green Belt whereas located elsewhere in the District could be achieved on brownfield land.
- 3.6 A broader approach to the issue of balance indicates that a more radical distribution approach is appropriate and should have been relevant evidence to guide the distribution policy. Without that approach to available evidence the evidence base for the distribution process undertaken is not robust for the purpose.

3.7 The conclusion of the assessment of the strategic and distribution policies is:

- It is both inappropriate and contrary to National Policy to provide that the sequential order should place loss of green belt before the allocation of urban extensions in sustainable locations. Such an approach is not legally compliant.
- The level of housing for the Wharfedale Sub-Area should be reduced to 1550 to balance employment land (jobs) distribution.
- The balance of the distribution should provide distribution more evenly with Menston, but with contributions from Addingham and Burley. Suggested Distribution:

Addingham	250
Ilkley	525
Burley	250
Menston	525

4.0 Site Selection Criteria.

4.1 The general thrust of policy HO7 is supported but it needs to recognise the need to balance the distribution of housing with jobs as an important guiding principle.

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

Policy SC1

POLICY SC1. The policy should include words to the following effect:

- 'The distribution of jobs (employment sites) should be balanced with the distinction of housing'.

It is suggested that these words are inserted as SC.B.10 and subsequent sub-paragraphs re-numbered.

Policy SC2. The policy should include words to reflect the proposed addition to SC1 at sub-paragraph SC2.B.2.

Policy SC4. The reference of Ilkley as Principal Town is misconceived in that it is not a focus for the rural hinterland. That focus has always traditionally been Otley and/or Skipton. There is no requirement for Ilkley to be an employment hub and, accordingly, the housing provision should be reduced.

Policy SC5

It is both inappropriate and contrary to National Policy to provide that the sequential order should place loss of green belt before the allocation of urban extensions in sustainable locations. Such an approach is not legally compliant.

Delete the reference to Cs in respect of Ilkley or delete Ilkley from the list of Principal Towns and re-categorize as a Local Service Centre.

Policy SC4 Sub-Paras A3 and A4 should be renumbered as A4 and A3 i.e. the order reversed.

Policy SC6. Add words to the effect in SC6.C:

All proposed development allocation should be appraised as to their contribution to the green infrastructure or support of adjacent green infrastructure and the allocation selection criteria (HO 7) shall seek to minimise adverse impacts to positively appraised sites.

Policy SC7. The number 15 in Policy SC7.C shall be deleted and replaced with 30.

Policy EC3. No change proposed – support.

Policy HO3 & WD1. Reduce 1600 to 1550 and re distribute numbers as to:

- Addingham 250
- Ilkley 525
- Burley 250
- Menston 525

Policy HO7. See proposals for SC6 – provide criteria that minimises impact of green infrastructure and land which supports green infrastructure.

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, I do not wish to participate at the oral examination
YES	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:

The Plan is predicated under spatial framework of the RSS. The RSS Settlement Study was significantly contested at the RSS Examination as sound and robust evidence. The Agent participated in that debate, but the Local Planning Authority did not. It is considered the Agent can bring relevant evidence to the Examination to assist the Inspector on the issue of soundness, both upon the issue of the role and purpose of Ilkley as a Principal Town, but also upon the issue of the balance in development distribution as proposed by the Plan.

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] Date: 31st March 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.

1. Do you live within or have an interest in the Bradford District?

