

## Core Strategy Development Plan Document

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

### Publication Draft - Representation Form

Monday 17<sup>th</sup> February until Monday 31<sup>st</sup> March 2014

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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](http://www.bradford.gov.uk/ldf).

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

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

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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.

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

- **E-mail to:** [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,  
2<sup>nd</sup> 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 31<sup>st</sup> March 2014**

For Office Use only:			
Date			
Ref			

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#### 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	Barrett	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Ilkley	
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 31/3/14

#### 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.

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	<input type="text"/>	Paragraph	<input type="text" value="YES"/>	Policy	<input type="text" value="YES"/>
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="NO"/>
4 (2). Sound	Yes	<input type="text"/>	No	<input type="text" value="NO"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="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.**

My first point is that the current government governing document: Our Programme for Government clearly states:

- We will radically reform the planning system to give neighbourhoods far more ability to determine the shape of places in which inhabitants live; and
- **We will maintain the Green Belt**, Sites of Scientific Interest (SSSIs) and other environmental protections, and.....protect green areas of particular importance to local communities.

The Coalition Document also states that the Conservative Party's National Framework for development will be incorporated as part of the Coalition's governing documents and this clearly states that:

- We will maintain national Green Belt protection, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and other environmental designations, which protect the character of our country's landscape, stop unsustainable urban sprawl and preserve wildlife.

To fully consider neighbourhood's views, more time was needed to read and understand the documents, then ask our views by plebiscite – consultation will obtain some views, generally those against it, a plebiscite is the only 100% accurate way for the residents of Ben Rhydding and Ilkley to determine the shape of the place they live.

THUS THE ACTUAL DOCUMENT (Very detailed and professional) APPEARS THAT IT HAS BEEN DESIGNED TO MINIMISE REPRESENTATIONS and THUS IN SECTION 4, 4(3) DOES NOT COMPLY WITH THE DUTY TO CO-OPERATE.

**I HAVE PROBABLY COMPLETED THIS FORM INORRECTLY BECAUSE IT IS NOT USER FRIENDLY – IT IS BUREAUCRATIC FRIENDLY,**

The Local Plan by implication recommendinmg 800 houses for Ben Rhydding and Ilkley is saying Green Belt will

be built on, in total contravention of the democratically elected government (c60% of the vote) ruling document.

Secondly, the Plan conflicts with the National Planning Policy ("NPPF") on preserving Green Belt and the best and most versatile farmland it encloses,:

- There is no corresponding infrastructure planned to deal with the consequences of extensive new housing developments e.g.
  1. There is no new school planned to deal with the increased numbers at an already overcrowded and oversubscribed grammar school;
  2. Both Bradford and Leeds Councils have recognised that the A65 (the only road in and out of Ilkley is already congested and at over capacity;
  3. There is no, or little scope for longer trains or platforms and peak time trains are already congested;
  4. There is insufficient parking for commuters taking the train;
  5. There is insufficient parking in Ilkley town (my 76 year old mother finds it difficult to find a parking space, and when she does it could mean a walk up a steep hill – quite difficult if not medically dangerous for somebody of that age);
  6. Much of the potential building land is in a flood plain (per DOE); and
  7. The drainage systems will be unable to "cope" – especially on the Countances Way Land, which during the last winter has been a virtual lake – the water will then either flood the property or flood the A65, the only route out of Ilkley.

Also the following paragraphs do not comply the NPPF:

- Par 14- adverse impacts significantly and demonstrably outweigh benefits and specific policies indicate land development should be restricted;
- Pars 80, 81 & 82 – Green Belts should only be altered in exceptional circumstances;
- Par 111 – Minimal consideration of using brownfield land;
- Par 120 – minimum regard paid to pollution effects of waiting traffic on Countances Way plus land north of the railway is nationally known for ringslip problems;
- Par 128 – heritage assets and their setting – the only appropriate setting for the Georgian farmhouse off Countances Way is on a farm – not a housing estate;
- Par 158 – full account not taken of market signals. Firstly a number of large developments in Ilkley have been halted for some time, so this may be a signal of overdevelopment in the area. Secondly there is evidence that Bradford is a particular deprived district, 42% of residents live in areas that fall into 20% most deprived nationally, and 5% live in areas that are among the most deprived. Overall c2/5ths of people live in some of the most deprived areas in the country, 34% on very low incomes, 19% claiming key benefits, unemployment is higher than average and weekly wages are almost £80 less than the national average. Household income in places like Little Horton averages £22,000. There is simply no way that the overwhelming majority of people in Bradford will be able to afford the type of housing that

will be (most likely) built in Ilkley - £300,000 plus. Bradford Council cannot claim that building executive type homes in Ilkley is the correct response to deal with the population increase in the central areas of Bradford. In fact it will make the situation worse in bringing people from outside the area into Ilkley NOT solving Bradford's housing problem. Ilkley's population growth is not internal nor from Bradford BUT from outside the area – Ilkley population and future population does not need any more housing.

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 more sound:

- Take into account future brownfield sites that might become available – thus using forecast population growth / housing needs with forecast brownfield availability to build rather than forecast housing needs with brownfield sites available today – you need to compare apples with apples not apples with pears;
- Need to fully account for houses that may become empty during the course of the plan;
- Take into full account empty houses
- Take into account the potential residential property above shops / other commercial premises;
- Plan the number of houses where the population growth will be;
- Look for more brownfield sites e.g., by the canals

**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:

Because I have lived in Ilkley for 50 years, so I have the knowledge of the growth of Ilkley, the problems with this growth but also the opportunities.

It is my neighbour hood and I care for it, and I want to determine its future, to ensure that it is for the best for Ben Rhydding and Ilkley – as per the Coalition Programme I WANT TO DETERMINE THE SHAPE OF THE PLACE THAT I LIVE IN.

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:

31/3/14

## 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.