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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	Mr	
First Name	█	
Last Name	Orton	
Job Title <small>(where relevant)</small>	Parish Clerk	
Organisation <small>(where relevant)</small>	Burley Parish Council	
Address Line 1	█	
Line 2	█	
Line 3	Burley	
Line 4	█	
Post Code	LS29 █	
Telephone Number	█	
Email Address	█	
Signature:	█	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	<input type="text"/>
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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 checked="" type="checkbox"/>	No	<input 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.

Burley Parish Council welcomes the opportunity to respond to this document which sets out the proposed planning strategy and draft policies to guide development and growth of the Bradford District up to 2030 with the implications for housing, employment, transport and community well being that will flow from this process.

Burley Parish Council particularly welcomes the attention to environmental concerns and issues of sustainability, but at the same time we find insufficient translation of vision into specifics in a number of respects and shortcomings in the awareness of local situations and we have identified a number of points to which we would draw to your attention. Our responses have been drawn from discussion at council meetings, Parish Forum and Neighbourhood Planning meetings which have been attended by councillors, representatives of local businesses and residents plus a broad range of written responses from individuals and groups within the village. During the consultation exercise the Parish Council made extensive use of social media with comments raised via the Burley internet links website (www.burley-in-wharfedale.org), and Twitter plus communications with neighbouring councils.

General Observations

Housing numbers:

The document offers a case for the overall number of new dwellings required in the Bradford District but, as in 2008 and 2012 we would continue to urge that this number is kept under review in the light of changing demographics, economic and social circumstances.

While we fully accept the need for development in the district as a whole we would wish to see growth at the local level being part of an ongoing organic process in response to changing needs.

Planning for People: Maximising the Use of Previously Developed Land:

We would be broadly in agreement (**Policies HO6, HO7**). These are then contradicted by other statements that some release of green belt land might be needed earlier in the process to meet the needs for housing type. **We would emphasise strongly that only brown field sites which lie within the green belt in the Burley Parish should be considered for development with no further release of green belt land; as the impact on conservation areas, the overall environment of communities which make them attractive places and provide 'Quality environment critical to social/economic wellbeing of the district'**. Under no circumstances should green belt releases lead to the joining up of separate communities: our particular concern is the narrow green corridor between Burley in Wharfedale and Menston. Development should be met in a progressive manner with each release of land over the 20 year development plan. Controlled generic growth within the village is an important factor for future development. 75% of the proposed housing numbers can be achieved by development of brown field sites without further intrusion into the green belt.

Transport and Modes of Travel: We endorse the aim in TR1 A:

- I. To reduce travel demand, traffic growth and congestion;
- II. To shift to modes with lower environmental impact;
- III. To improve journey time reliability.

To enable these to be achieved will require:

- I. An increase in the potential for local employment;
- II. Improvements in parking;
- III. The plotting and improvement of SAFE cycle and footpath networks **prior** to any new developments;
- IV. Significant improvements in bus services and assurances that journeys to the major conurbations will be faster than at present;
- V. Public campaigns to enhance cycling as a mode of transport;
- VI. Increases in train capacity between Wharfedale and Leeds.

Parking: TR2

There are already serious parking issues in Burley both in the village centre, main street and adjacent to the rail station. Car parking around the Grange in the centre of the village which had for many years been accessible to residents is no longer available. The issues around the station are already acute and need to be addressed prior to any developments. Furthermore it is most unlikely that residents in any new developments at the periphery of the village will walk or cycle to the station. While we applaud the documents vision to increase cycling to the station this will be difficult to achieve and the document needs to come up with effective strategies and concrete plans.

Education:

The proposed increase of dwellings in the Wharfe valley will have significant implications for education, especially at secondary level. There are 90 primary school children per year from Burley alone needing secondary places and the admission number for Ilkley Grammar School is only 245. There should be a robust statement within the Core Strategy how these issues will be addressed. The final plan needs to demonstrate how the current secondary school need will be met with some indication of timing, location etc.

Transport and Economic Revival:

There is severe congestion at rush hours and also at other times of the day on the main road routes into Leeds and Bradford as well as congestion on peak hour trains connecting Wharfedale and Leeds. This congestion must be addressed prior to further development.

Burley Parish Council Observations Specific to the parish

Infrastructure

It should be emphasised that there have been few infrastructural improvements as a response to the growth in the early 1990s and a number of deteriorations. The total improvements to the infrastructure are the expansion of one primary school, some increase in library hours, moderate improvements in train services, and a recent improvement in the bus connection with Harrogate. Over the same time the direct bus service during the day to Bradford has been terminated, the direct bus service to Leeds via the A65 has been lost and there have been growing concerns about Burley children being able to access Ilkley Grammar School, a concern that will be exacerbated further by population growth in Addingham and Ilkley.

While there are frequent mentions of infrastructure developments that will be required to meet the proposed new housing in Wharfedale it has not been **sufficiently recognised that some of these needs are immediate** and have not been addressed. For example: the need for expanded secondary school provision in the Wharfe valley - the need is already with us; the absence of bus links with Bradford; and parking issues within Burley in Wharfedale and within the vicinity of stations throughout Wharfedale.

While the intention to achieve some change in journeys from car to cycle is welcomed there is a need for this to be addressed now before any further increases are implemented; including sympathetic support for the proposed Wharfedale Greenway cycle and pedestrian route from Pool to Burley using the thread of the former railway track with an additional link to Ilkley.

Housing

We would wish to stress that housing growth should not only be based on regional and district requirements but also on local needs and be supported by the expansions of small business and other local employment opportunities. The current document provides no allowance for commercial development in Burley. **SC1.10, (p43)** specifies that developments should be of high quality and contribute to inclusive built and natural environments which protect and enhance local settings, character, distinctiveness and heritage. The current proposals which depend on release of green belt land in the conservation area and other sensitive locations contradict this statement. **3.74** warns against unbalanced development with 'over heating' of already successful areas. We would argue that the current proposals for Burley are in danger of doing this.

There is a particular concern about the potential joining together of Burley and Menston, currently two separate and discrete communities. Should policies **BU/002** and **ME/007** be developed this would join the two communities creating a suburban sprawl.

Affordable Housing:

Burley has achieved some new affordable housing in recent years. There are concerns, however, that this is often lost when dwellings are sold on. The need for affordable housing in Burley is a continuing one but achieving a 30% level within Wharfedale will pose major challenge as against a 15% target in inner Bradford and Keighley.

Cooperation within the Leeds City Region

As the closest town to Burley in Wharfedale, some reference should be made to the role of Otley as a potential source of employment for the Wharfe valley. A particular comment needs to be made about the airport. Historically the region has not exploited the transport corridors leading to the airport. Business opportunities lie in the areas leading to airports. There are no quality trunk roads or major improvement schemes in the pipeline and this needs a cross regional response.

Simplification of Planning (P267):

The Parish Council would wish to make the following observations:

1. We do not accept that Burley in Wharfedale is suitable for any SPZs as the surrounding green belt areas designated for development are too sensitive.
2. PPAs should only be accepted after consultation with the Parish Council and clear specification of penalties which can be enforced for non-performance against the timescale.
3. This should be agreed with the local parish council prior to publishing the final document.
4. These should be listed against SHLAA sites.
5. SPDs only if 1-4 are fully adhered to.

Leisure:

Under the proposals additional open space and recreational open space would be required, especially within any developments at the edges of the village and particularly at the west end and these needs to be addressed at each release of development land. The specified parking to support recreational facilities would require new provision in Burley in the area of the Recreation Ground.

We support the proposal for allotments near new developments but would note that there is already a very considerable waiting list in Burley and active efforts to secure additional land have not been successful.

Conclusions

The concerns about the Core Strategy that have been most frequently raised in verbal and written responses from residents in Burley are:

- i. *Inadequate attention to Infrastructure needs to meet already existing difficulties as well as full specification of those required to support any future developments;*
- ii. *The potential impact on the green belt and the joining together of Burley and Menston if specific land allocations are implemented;*
- iii. *Under the proposals additional open space and recreational facilities would be required. These facilities should be integral to any planning application for additional housing;*
- iv. *The accuracy of demographic projections on which housing allocations are generated;*
- v. *Lack of attention to the Conservation Area and the Village Design Statement;*
- vi. *Any development in Burley has to be seen in the context of the Wharfe valley as a whole and in the context of maintaining Burley as an individual and separate community;*
- vii. *Given the location of Burley any development also needs to be seen in relation to Leeds development plans;*
- viii. *To impose a level of growth which threatens the quality and distinctiveness of its environment and what makes it a good community is of widespread and significant concern;*
- ix. *The transport infrastructure upon which so much of this plan rests is stretched nearly to breaking point;*
- x. *The brown field sites within Burley should be included in the SHLAA. In line with the policies as stated we would anticipate that brown field sites would be developed ahead of any green field sites.*
- xi. *Any windfall sites should be included in the total for the village;*
- xii. *Maintaining the integrity of the villages of Burley and Menston is an imperative and building that seeks to join the two settlements will be resisted.*

We anticipate a full consideration of our comments and responses in the Final Report. If you should have any queries regarding the content of this letter please do not hesitate to contact the Parish Council.

Yours faithfully


 Orton

Clerk to Burley Parish Council

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.

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, 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:

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.

