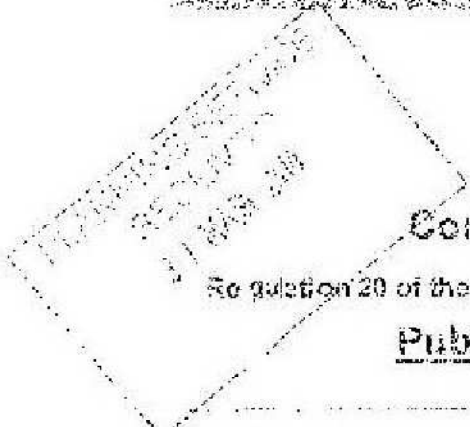


# City of Bradford Metropolitan District Council



Form No. 100/14

2014  
2014

## Core Strategy Development Plan Document

Regulation 20 of the Town & Country Planning (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** [REDACTED]

**Last Name** Timmons

**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**

**Email Address**

**Signature:** [REDACTED]

**Date:** 29/3/2014

#### 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.

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

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

Section	<b>Wharfedale</b>	Paragraph	<b>Various</b>	Policy	<b>Various</b>
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (2). Sound	Yes	<input type="checkbox"/>	No	<input 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.

1.1 The Plan shows a large amount of work by the Council.

1.2 However it fails to comply with NPPF policy.

1.3 It is not in compliance with core planning principle 17: empowering local people to shape their surroundings, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside, encourage the effective use of land by reusing land that has been previously developed (brownfield land);

1.4 It illegally fails to comply with NPPF para 158: Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence.

Council evidence for Wharfedale has not been included in the Plan:

1.4.1 RUDP Ilkley Settlement Area Table (29KB) for east of Ilkley/A66:

The lower part of the site .... is affected by flood risk and tree preservation orders

1.4.2 Bradford Growth Assessment November 2013:

East of Ilkley/A65 Part of the site is mapped as Flood Risk zone 2 or 3.

1.4.3 Bradford Growth Assessment November 2013

East of Ilkley sites are within the SPA 2.5km zone and one site is adjacent to SPA 400m zone.

1.5 It illegally fails to comply with NPPF para 156. Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence.

Council evidence for Wharfedale has not been acted on in the Plan:

1.5.1 Local Infrastructure Plan 5.5.4:

Some routes within the sub-area, especially the A65/A6038 corridor, are already congested at peak times, with severe delays at junctions in Ilkley.

One east of Ilkley site is on the A65 and adjacent congested road and second site is entered via congested Ben Rhydding Conservation Area.

1.5.2 Local Infrastructure Plan 5.5.2:

The CBMDC Children's Services have confirmed that there is an existing capacity issue for both primary and secondary school places in Wharfedale .....this requirement for school places is likely to be higher than predicted by the District wide formula.

1.6 The Plan fails to consider Planning Policy Statement 23: Planning and Pollution Control and other related documents on new developments near sewage works.

The Plan fails to consider DEFRA's and other organisations' guidance on housing and other buildings adjacent to sewage works. There is a sewage works adjacent to one proposed site east of Ilkley.

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

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

Section	<b>Wharfedale</b>	Paragraph	<b>Various</b>	Policy	<b>Various</b>
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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	<b>NO</b>
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.

1. Not positively prepared:

1.1 The need for more housing in the District is understood. However the model of allocating new house numbers based on the proportion of the present populations in each area is simplistic and not objective. Other options have not been considered.

The Plan should focus on the Regeneration Priority Areas; Wharfedale is not one of them.

1.2 As the Plan notes, appendix 1, population growth and therefore housing demand are likely to be most acute within the main urban areas and particularly within the Regional City of Bradford. As the Bradford Growth Assessment, November 2013, states, Keighley is the second largest settlement in the District. Objectively growth should therefore be in these two areas.

2. Not justified or effective:

2.1 The Plan is not in keeping with Strategic Core Policy (SC8). One Ben Rhydding site is adjacent to Zone A (400m) and both are in Zone B1 (2.5km).

2.2 Background paper: 2 Housing (Part 1). Para 4.18. NPPF: Once established, Green Belt boundaries should only be altered in exceptional circumstances.

However Appendix 3 notes that Ilkley has the highest estimated green belt contribution of all areas in the District (59%) compared to Keighley (36%) and Bingley (20%). Also total unconstrained land in Ilkley is 0% and in Keighley is 51%.

2.3 Background paper: 2 Housing (Part 1). Para 4.32. The SHLAA provides a partial indication of green belt potential – partial because the sites within it reflect merely those which had been submitted by landowners and developers.  
This is not objective evidence on which to base green belt development.

2.4 The Local Infrastructure Plan (LIP) is part of the “evidence base” for the Core Strategy Plan (the Plan).

The LIP correctly notes Wharfedale infrastructure issues. The Plan does not take these infrastructure issues into consideration in its proposals for allocation of land for housing. This failure to take the evidence into consideration is illogical and, under the terms of the Plan, illegal for Flooding and probably illegal for Transport and Education.

2.5 In keeping with the Council's Guidance on representations, the following is part of the evidence which needs to be considered.

#### 2.6 Flooding

One site on the A65 east of Ilkley is partially in a flood zone 2/3. Development here is not appropriate.

#### 2.7 Transport

2.7.1 One proposed development east of Ilkley is adjacent to the A65. As noted in the LIP, this road is congested at peak times, with severe delays at junctions in Ilkley. The proposed development cannot safely have access to this road.

The other road adjacent to the proposed development links one way to the congested part of the A65 and the other way, via a single lane underpass, to the railway station and Ben Rhydding Conservation Area. This road is also congested at peak times and at other times. The proposed development would cause a gridlock of traffic in this road and adjacent roads. There is no adequate transport access for this proposed development.

2.7.2 The second proposed development in the east of Ilkley is accessed via a steep, dangerous road, which is usually blocked every winter.



2.7.2 (cont'd) This road leads down to its main access in the Ben Rhydding Conservation Area via a single lane gateway. The adjacent roads are already congested at peak times and other times.

The proposed development would cause a gridlock of traffic into and in the Area. There is no safe adequate transport access for this proposed development.

2.7.3 For Transport the two proposed developments are not accessible or sustainable developments. They are neither justified nor effective.

## 2.8 Education

The LIP notes the CBMDC Children's Services have confirmed that there is an existing capacity issue for both primary and secondary school places in Wharfedale. The LIP notes it is likely that housing sites will be targeted by family house builders....the demand for school places will be high.

There is no room in the schools in Ilkley for the numbers of children who would live in the two proposed developments east of Ilkley.

For Education the two proposed developments are not sustainable. They are neither justified nor effective.

## 2.9 Tourism

2.9.1 The LIP notes that Ilkley is a "world renowned visitor destination".

2.9.2 The LIP states: Rombalds Ridge and Ilkley Moor are key green assets for the area and serve the whole of the district and beyond... Maintaining the overall quality and increasing the level of accessibility to these existing green spaces within Wharfedale are vital to fulfilling the objectives for future development in the area.

2.9.3 The proposed development east of Ilkley on the A65 would restrict accessibility and the quality of the area for visitors arriving from the east.

2.9.4 The proposed development east of Ilkley adjacent to the SPA 400m zone would impair accessibility to the SPA at present used by walkers, runners, cyclists and horse riders.

2.9.5 Overall the two proposed developments east of Ilkley would reduce the quality and accessibility to the existing green spaces around Ilkley.

2.9.6 The proposed developments east of Ilkley would be renowned nationally as examples of how to discourage and impede tourism.

#### 2.10 Amenity green space

The Bradford Community Strategy includes four high-level outcomes. One strategic aim linked to Outcome 4 is to create a greener, cleaner and more sustainable environment.

The Bradford Growth Assessment states that in Ilkley the Open Space, Sport and Recreation Study identified gaps in provision for parks and gardens to the east, amenity green space, play areas and civic space. .

The proposed development east of Ilkley adjacent to the SFA 400m zone is in viable farm land, which is also used by walkers:



The proposed development would be contrary to the Community Strategy and would reduce amenity green space, as well as reducing access to the SFA.

#### 2.11 Football pitches

The LIP states that there is a deficiency of designated mini and junior football pitches across the District, including no capacity in Ilkley.

The proposed development east of Ilkley adjacent to the A65 would eliminate any prospect of developing such football pitches on the land.

2.12 The proposed developments east of Ilkley would be an embarrassment for those of us who live and work in the Bradford Metropolitan District. They would make Bradford Metropolitan District Council look incompetent and ridiculous. They are examples of poor planning and they are not positively prepared, justified or effective.

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.

The Plan should be based on the evidence, the guidance and these representations.

*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:



Date:

29/3/2014



**Core Strategy Development Plan Document (DPO) : 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?

