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City of Bradford Metropolitan District Council

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Ref

Core Strategy Development Plan Document

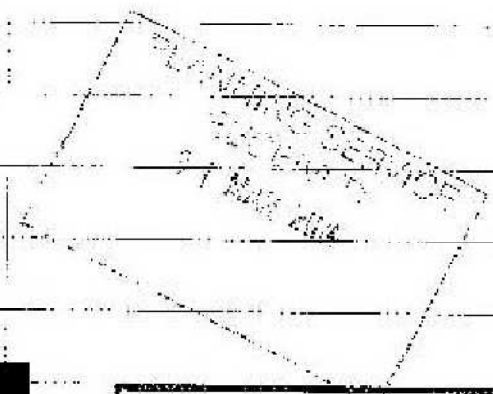
Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

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	[REDACTED]	
Last Name	VARLEY	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	ILKLEY	
Line 4	WEST BORNHIRE	
Post Code	LS 29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 29 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	Various	Paragraph	See separate attachments	Policy	See separate attachments
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4. Do you consider the Plan is:

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

LEGAL COMPLIANCE It is difficult for a lawyer to state honestly the Plan is not legally compliant, but it appears possible why the question is being asked. However the Plan complies on various levels with the National Planning Policy Framework and specifically with the Habitats Regulations Assessment. I believe it that there are "legal" deficiencies.

SOUNDNESS As required, my views are contained in separate attachments under the following

- Headings:
- A. Isley is "primed" town?
 - B. Green Belt
 - C. Infrastructure
 - D. Number of houses

DUTY TO CO-OPERATE The purpose of consultation/representation is assumed to enable the views of individuals, or well as groups, to be heard and taken into account. The subject matter is voluminous and complicated, so it is difficult for the Council to demonstrate their "co-operation" and access to the Plan, NPPF guidelines etc. However, I do feel that the Council could have been more pro-active in terms of communication and explanation to individuals; to Isley, the Plan documents are available for consultation at the Town Hall, but only by appointment, and on Tuesdays!

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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.

1. I do not know the extent of brownfield sites in Ellikay, but these must surely be explored and reflected in the Plan before it is adopted. Should not part of the "Teaser land" have been earmarked for housing?
2. I am not against new housing in principle, as it is part of a natural process. However I consider the figure of 500 homes as proposed should be drastically reduced, even to a figure which could be met by that natural process.
3. A proper comparison of benefits and adverse should be carried out, as also a proper assessment of local needs as it affects Ellikay, so that the public can clearly compare the "pros and cons."
4. "Sustainable development" is defined as being about change for the better. I cannot see how this requirement can square with enforcement upon the Green Belt, references to which should therefore be deleted.

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:

29 March 2014

CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

PUBLICATION DRAFT – REPRESENTATION FORM

■ FARLEY - ATTACHMENT 'A'

Ilkley - A "Principal" Town? – (Section 3, Para 60, policy SCH)

Because of the history and intrinsic nature of Ilkley & Keighley, it would be difficult to imagine two more disparate towns, despite their proximity and perhaps surprisingly being joined together as a parliamentary constituency – this no doubt as a result of their being made part of the Bradford Council area.

- (i) Ilkley's essential character and development is constrained by geography – it sits in a narrow valley through which a major river flows, with very few bridges.
- (ii) For historical reasons, Ilkley is essentially a commuter town with relatively little light industrial activity.
- (iii) As evidenced by the large number of shops, restaurants etc, Ilkley welcomes many visitors and tourists from outside the area, as well as from the Council district.
- (iv) Ilkley sits on the edge of the Council District, with a population of perhaps only one-fortieth of the District's total.
- (v) Many council administrative services previously operated from Ilkley, no longer exist and there is no hospital or emergency medical service.

All these features distinguish Ilkley from Keighley, so that the two towns should not be similarly categorised for planning purposes.

Bingley is probably in between, a small commuter town with still some heavy industrial/commercial activity.

CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

PUBLICATION DRAFT – REPRESENTATION FORM

■ VARLEY - ATTACHMENT 'B'

Green Belt – (Section 3, para 103-116, Policy SC8, Section 5.3, Para 64, Policy HO3)

- (i) The 1988 West Yorkshire Structure Plan confirmed that the Green Belt boundary at Ben Rhydding was “natural, strong and defensible”. There has since been no geographical or significant commercial change.
- (ii) The current plan conflicts with NPPF in various ways including:-
 - a) Changes should only be made in exceptional circumstances (Para 83)
 - b) The government attaches great importance to green belt (Para 79)
 - c) Para 80 cites four specific purposes for maintaining green belt, all of which appear to apply to Ilkley –
 - prevention of towns merging
 - safeguarding the countryside from encroachment
 - preservation of the setting and special character of historic towns
 - assisting urban regeneration through brownfield sites.
- (iii) The framework also states that sustainable development “is about change for the better and not only in our built environments”.
- (iv) Para 14 states that if adverse impacts (of change) “significantly and demonstrably outweigh benefits development should be restricted”.

CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

PUBLICATION DRAFT -- REPRESENTATION FORM

■ VARLEY ATTACHMENT 'C'

Infrastructure (Section 3, Para 15.3)

Generally, little regard appears to have been given to the consequences of a significant increase in population arising from Plan.

Education

- (i) All schools in the area are currently oversubscribed: no school building or liaison with adjoining authorities appears to have been considered (NPPF Para 77).
- (ii) The Local Infrastructure Plan (2013) accepts the existing problem of too few school places, but no proposal appears in the plan.
- (iii) Any solutions to the lack of school places will impose on future transport problems.

Transport

- (iv) The main road into and out of Ilkley (A 65) is already congested at peak times.
- (v) There is already pressure on roads within the town and on parking for residents at peak times, let alone visitors.
- (vi) The nature of the town's geography means there is little if any scope to alleviate these road transport problems; the opening of the proposed new Tesco store will only make matters worse.
- (vii) Rail connections (to both Leeds and Bradford) are currently good, but of insufficient capacity at peak times. There are again apparently insoluble parking problems near stations with no scope for longer trains/platforms, or more trains, although the need for larger trains is acknowledged by LIP, but not by the Plan.

CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

PUBLICATION DRAFT – REPRESENTATION FORM

■ VARLEY ATTACHMENT 'D'

Number of Houses (Section 5.3, Para 64, Policy H03)

Generally there is no evidence that local need has been assessed so that the proposal for 800 new homes (reduced from 1,300) appears to be little more than arbitrary. The impact of such a large number in terms of effect on the green belt, infrastructure and tourism also does not appear to have been taken into account specifically.

- (i) Within the District there is obvious need for affordable houses but there is no indication how this will be achieved in Ilkley. Also if "normal" Ilkley houses are to be built, who will be able to afford them? In short, where is the market for new housing to come from?
- (ii) There would appear therefore to be a danger of over-development from a commercial view point, insofar as some recent developments have been aborted, presumably due to, possible saturation.
- (iii) Planning permission for new houses in Ilkley has been already granted at the rate of 50-100 p.a. This existing usage of new sites (although not all have been built), particularly conversions of large Victorian properties/sites, has not been taken into account.
- (iv) "Brownfield" potential sites in Ilkley, although limited in potential do exist and have not been reflected in the plan. As an aside, why was the large brownfield site in Ilkley given approval in its entirety to Tesco for a new store, rather than holding back a part of the site for housing?