

City of Bradford Metropolitan District Council

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Core Strategy Development Plan Document

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

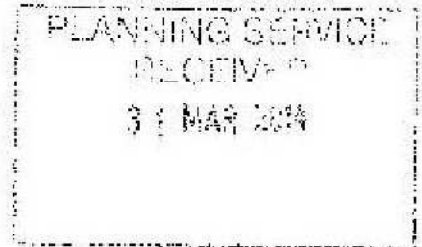
Publication Draft - Representation Form

Monday 17th February until Monday 31st March 2014

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



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

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

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.

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

- E-mail to: ldf.consultation@bradford.gov.uk
- Post to: Local Plan Group, City of Bradford Metropolitan District Council, 2nd 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 31st March 2014

City of Bradford Metropolitan District Council

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PLANNING SERVICE
RECEIVED
31 MAR 2014

For Office Use only:

Date

Ref

Core Strategy Development Plan Document

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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	Cllr	
First Name	[REDACTED]	
Last Name	Hawkesworth	
Job Title (where relevant)	Councillor	
Organisation (where relevant)	City of Bradford Metropolitan District Council	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	Ilkley	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature	[REDACTED]	Date: 28 th 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.

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="checkbox"/> The whole	Paragraph	<input type="checkbox"/> The whole	Policy	<input type="checkbox"/> The whole
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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 checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" 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.

Please see my attached submission on two sheets

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 see my attached submission on two sheets.

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 type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" 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:

I may wish to amplify my submission in the light of any further comments by the Authority, and in the light of further information that may come to light

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:

28th 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?

Submission of [REDACTED] Hawkesworth District Councillor Ilkley

The Core Strategy ("the CS") produced by Bradford Council relevant to Ilkley is in direct conflict with the views of the majority of Ilkley Residents and the best interests of the economy and environment of the town.

The CS cites that the towns of Airedale and Wharfedale will by 2030 have been transformed into attractive, cohesive and safe places. Ilkley is already an attractive, cohesive and safe place and does not need transforming.

The CS does, however, emphasise that local distinctiveness is paramount. This is reinforced in CS 3.70 p47 where it states that a town's character and distinctiveness is protected and enhanced.

CS p24. All CS policies must ensure that the perception of Ilkley as a "spa town" is recognised and prevails.

Ilkley is an Edwardian Spa town. It has acquired its popularity and viability due to its appeal to visitors. This appeal is because of its landscape, setting and a small Town Centre with "cafés" and boutique shopping. This appeal and hence its economic base will be damaged through the expansion and "regeneration" of the town. It is at its optimum size and unlike the smaller rural villages does not need expansion in order to produce a vibrant town centre. Ilkley is not a market town. The town needs to keep an upmarket ambience, with festivals as a draw to visitors.

Infrastructure. The CS pays little regard to the need for infrastructure improvement (Sect. 3 para 153 states that there is sufficient infrastructure). In order to maintain the vision of "A Spa and Festival Town" the effect of increased numbers along (as is inevitable) the valley bottom would be catastrophic.

The geographical fact of a glacial valley means the roads have been laid along the valley. Ilkley has one road – the A65. It does not have "excellent road links" as claimed in the Strategy. The street grid within the town was developed in late Victorian times by the "Middeltons Master Plan" and is not suitable or capable of taking more vehicles than currently. Due to pinch points with heritage value the constraints cannot and must not be removed. More vehicles - and hence more stationery traffic - will produce an unacceptable level of pollution. To widen and "open up" the roads would ruin and destroy the Edwardian ambience of the town.

The two railway stations (quoted on the plan) and "excellent railway links" are at over capacity. The lack of all day parking linked with these stations means commuter parking is overloading the town centre streets and causing unacceptable blockage of streets.

To produce a "park and ride" at the wrong side of the town for commuters will result in more overloading of the A65 and pollution in town centre pinch points. It is essential to produce all day parking to the west side of the town on the A65.

Green Belt. National Planning Policy Framework says "Once established green belt boundaries should only be altered in exceptional circumstances" (NPPF para 83). In a recent ministerial statement Planning Minister Nick Boles said:-

"Unmet housing need is not an exceptional circumstance justifying green belt release"



The Minister further went on to stress the importance of bringing brownfield sites into use and made clear that authorities do not have to allocate sites on the basis of providing the maximum possible return for landowners and developers. Yet the SC sets out positive measures for green belt release within Wharfedale. These would produce ribbon development along the Valley. Without changes to comply with the Ministerial Statement the soundness and legality of the CS is questionable.

Hierarchy. Ilkley has been cited as a Primary Town. This means it is expected to be the focus for services within the valley. It has in the recent past been designated Rural Service Centre – a massive difference. The town cannot supply all the needs of the valley. There is no suitable site for secondary education to be provided solely within Ilkley nor is it sustainable. An additional secondary school is needed within the valley. This does not necessarily have to be within the Bradford DMC boundary but could be in a neighbouring authority (duty to co-operate). Bradford Council no longer provides neighbourhood services within the valley. Ilkley Town Hall is virtually empty and will be closed in April. It is cited as having a hospital. This is misleading. The Coronation Hospital provides “clinics” not hospital services.

The designation of Ilkley – Policy SC4 p41/42 should be amended from “Principal Town” to “Local Service Centre”.

Habitat. Bradford Council is the decision making body with regards to the protection of the South Pennine Special Protection Area And SSIs.

It is failing in this regard as the Habitat Survey clearly states Ilkley is at most danger from development. Yet the amendment made after the production of the Strategy does not indicate on what basis the reduction of new houses from 1300 to 800 was made. It appears to have been done on an arbitrary basis. The whole of Ilkley comes within the 2.5km Habitats Protection Zone designated under Habitat Regulations (s3, para106).

Flood Risk. The CS fails to acknowledge the geophysical nature of the Wharfe Valley. Ilkley and Wharfedale are built on millstone grit as opposed to sandstone in the rest of Bradford District. Millstone Grit is not porous and produces pooling – springs and danger of flooding on an inconsistent basis. This threat comes from the moorside as well as the River Wharfe. This invalidates the CS due to the impossibility of further development in the area of Ben Rhydding particularly.

Necessity for New Town. The projected growth in population is associated with the area of the former City of Bradford itself and not Wharfedale. The additional housing should be provided where the population growth requires it. Brownfield land within the area of the former City should be the first to be developed. Should the brownfield land available not meet the expected need a new settlement should be produced to the south of the District where there is excellent motorway access and is in close proximity to and should be produced in co-operation with Kirklees and Leeds Districts.

Conclusion. For the above reason the CS is fatally flawed.

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[REDACTED]
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28th March, 2014