

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**

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		Miss
First Name		[REDACTED]
Last Name		Coffey
Job Title <small>(where relevant)</small>		Planner
Organisation <small>(where relevant)</small>	Martree Developments	Rural Solutions
Address Line 1		[REDACTED]
Line 2		[REDACTED]
Line 3		[REDACTED]
Line 4		Skipton
Post Code		BD23 [REDACTED]
Telephone Number		[REDACTED]
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: 28/03/2014

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	5.3	Paragraph	various	Policy	HO 1
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4. Do you consider the Plan is:

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

We object to the current approach to the Distribution of Housing Development and the associated settlement targets as they are not seeking to deliver the objectively assessed housing need across the Borough. Whilst there are regeneration challenges in Bradford that would benefit from it being an increased focus of development, that cannot be at the expense of meeting housing needs in the northerly part of the Borough, and Ilkley in particular.

As an identified Principle Town, Ilkley should be allocated a level of future development commensurate with that role and the level of services it offers which represent a sustainable location for new development, and the needs of its population.

The 'General Principles' section (5.3.42 – 5.3.45) sets out the starting principles which the Council considers central to determining the distribution of housing growth. However none of these consider the housing need of the different settlements arising from both natural growth and in migration. Table H03 suggests that likely housing need based current population distribution for Ilkley would result in a housing requirement of 1194 dwellings. However the proposed target is for 800 dwellings, close to a third less. It is clear that this proposed housing target would not allow for housing to be delivered in Ilkley to respond to identified housing requirements arising from its current population, nor reflect its popularity as an aspirational place to live.

The reason given for reducing the housing target in Ilkley is that the findings of the Habitats Regulations Assessment has led to "significant areas of the district being effectively ruled out for accommodating significant additional development due to the impacts on the internationally important South Pennine Moors SAC/SPA" (5.3.56).

The accompanying Ecologist Letter submitted with this response supports our conclusion that this is not a requirement arising from the HRA and that other solutions for ensuring development does not result in

unacceptable harm to the SPA, involving mitigation and improvement of alternative habitat sites, are available.

The result of the proposed approach is an artificial reduction in housing numbers below those needed to ensure the future vitality and natural growth of Ilkley. This approach is contrary to provisions of the NPPF (paragraph 47) which states that LPAs have a duty to plan for the assessed housing needs of their residents and is therefore unsound by virtue of not being positively prepared or justified.

The Publication Version Core Strategy advises at 5.3.13 that *"the district is expected to see rapid and sustained population growth over the (plan) period"* yet the proposal to reduce housing numbers beyond what would appear necessary to meet the needs of its population within their communities would seem at odds with the recognition of this growing need for housing.

We will be following this representation with a more detailed Site Assessment Document which will demonstrate that Ilkley Site IL/019, despite being highlighted as within a buffer zone of habitats and bird sightings, is capable of sensitive redevelopment with no detrimental impact on the SPA. We will also be willing to attend any examination, accompanied by an Ecologist, to argue these points in more detail.

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.

Policy HO1: The Districts Housing Requirement

The proposed housing target for Ilkley should be increased to one that reflects the identified likely housing need in the area based on population etc i.e. 1200.

If necessary this should include consideration of a strategic extension to identify land currently outside the built up area of Ilkley not previously considered for development, to ensure that sufficient sites can be delivered without net biodiversity harm.

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:

To reinforce the comments made in this representation and to demonstrate that sites are available in Ilkley which could be developed with no significant harm to the nearby SPAs.

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: 28/03/2014
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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.