



For Office Use only:		
Date		
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	Mrs	
First Name	[REDACTED]	
Last Name	Spiller	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	Ilkley	
Line 3		
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address		
Signature:	[REDACTED]	Date: 31 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	5.3	Paragraph	64	Policy	HO3
---------	-----	-----------	----	--------	-----

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	x
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.

I do not believe the plan for Wharfedale is sound as:

- It is not positively prepared as it does not match development with infrastructure requirements (particularly education and transport) and is therefore not consistent with achieving sustainable development.
- It is not consistent with the National Planning policy Framework.

The plan is to build 1600 homes in Wharfedale, 800 of which in Ilkley with little plan to increase school places other than monitor the live birth rate (per the Local Infrastructure Plan (LIP)). The LIP states that the school places position in Wharfedale is already classed as CRITICAL. It has been critical for a number of years even before any proposed development begins. The LIP states that given the existing profile it is likely that builders will want to build family homes rather than other types. So the already critical position will become untenable. The LIP also says that shortage of school places could pose significant challenge to delivery of growth' para 5.5.1.

So the current form of the plan means that it is not consistent with sustainable development

- Economically as it is not ensuring that sufficient land of the right type is available in the right place at the right time.
- Economically as it does not co-ordinate the planned housing development with the required infrastructure eg schools
- Socially as it does not meet the needs of th present generation let alone the future inhabitant with accessible local services.

So what will the Council do with all the children unable to access school places –possibly allocate them out of area schools? This will increase congestion on the only route through the area the A65 which is already congested at peak times. Given the geography of the steep narrow valley, river and town it is not clear to see how improvements could be made. The only other route out to the rest of the district is over the moor road which is narrow and windy. Indeed the LIP does not include road infrastructure improvements either.

A further fact is that the land previously earmarked for a new increased capacity secondary school has now been earmarked for more housing! How can this be considered joined up co-ordinated planning! The site of th old middle school is also in the process of being used for housing! The Council have an

existing school places problem but instead of solving it are aggravating it.

The site of the existing school is not amenable to extension. It is on a steep slope. There are no playing fields on site – all 1500 pupils have to be bussed (along the A65) to the playing fields. There is insufficient space to allow all year groups to eat on site. Due to the limited space post 16 access is restricted to those achieving more than 5B grades at GCSE.

Also the land the Council is proposing to build on is green belt land which again suggests the plan for Wharfedale is not positively prepared as it fails on the 3rd dimension of sustainable development per the National Planning Policy Framework- that of protecting and enhancing the natural environment. The Framework states that the government attaches great importance to Green Belt. Given the practical infrastructure issues noted above re education and transport which the LIP fails to address I do not see why the Council is justified in building on the green belt in Wharfedale per its Core Strategy – the Council has not made a coherent case for declassifying Green Belt in this case.

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.

Sort out the school places problem before you use virtually the only land available for a school for more housing and creating an even bigger problem to a situation you already class as critical.

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	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:	31 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?