

28/03/2014

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	Mr		
First Name			
Last Name	Long		
Job Title (where relevant)			
Organisation (where relevant)			
Address Line 1			
Line 2	ILKLEY		
Line 3			
Line 4			
Post Code	LS29		
Telephone Number			
Email Address			
Signature:	Date: 27/03/2014		

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.

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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	5.3	Paragraph	84	Policy	HO3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	x
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.

The strategy sets out measures to minimize the use of green belt land yet under the proposal to build 800 new homes in Ilkley 55% of these are earmarked on green belt land. This is contrary to current government policy.

There appears to be no account taken into consideration of the number of new builds over the last ten years on existing housing sites which is around 500 new homes. (eg 5 homes being built were one previously existed) Any numbers for this type of build should be included in the new housing numbers. This trend will continue and there are a number of existing sites where building new homes was started but then stopped in 2008. (eg corner of Lower Constable Road and Clifton Rd) This hardly demonstrates the requirement for 800 additional homes.

It is unclear from the strategy how the figures of 800 new homes have been arrived at.

The number of new housing numbers have been reduced on account of the Habitats Regulations Assessment but only by 38% in Ilkley whereas the rest of Wharfedale the reduction is 55%. The whole of Ilkley comes within the habitats protection zone.

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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	3	Paragraph	15.3	Policy	Core Strategy
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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.

There is insufficient infrastructure to support additional home building over and above the re-development building on existing homes.

Ilkley Grammar School is currently over-subscribed and has been for a number of years. Bradford Council's previous plans for school numbers in Ilkley was proved to be totally wrong when Bradford moved from a three school system to two. There are no current plans to build a new school in the area, therefore Ilkley children face the prospect of being bussed to schools outside the area.

There is only one major road in and out of Ilkley the A65. Studies in recent years concluded that the A65 was congested and there a limited opportunities to increase highway capacity. Leeds Council are also planning to build 2300 new homes in Aireborough and this is served by the A65. Ilkley is a tourist town and transport congestion is going to deter visitors to Ilkley.

Parking in the town centre car parks is becoming increasing more difficult to find a space and all parking on roads around the town centre is taken up by rail commuters to Leeds and Bradford. There is no land to build new car parks in the town centre.

There is already overcrowding on the trains to Leeds and Bradford at peak times.

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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	5.2	Paragraph	62	Policy	HO3
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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.

Ilkley Moor, which separates the valley from the rest of the conurbation, and proximity to the Yorkshire Dales National Park and Nidderdale Area of Outstanding Natural Beauty, create a unique environment that would be compromised by the scale of the proposed developments.

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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	3	Paragraph	6	Policy	SC4
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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.

Ilkley has been designated a "principal town" along with Keighley and Gingley yet

- Its population is less than 3% of the Bradford District total.
- It is 1/3 the size of Keighley
- The majority of its residents work in Bradford or Leeds, hence it is a commuter centre not an employment centre.
- It sits on the edge of the district
- There are no hospital or emergency medical facilities.
- Most administrative council services have been withdrawn and there are currently no bus services to Bradford.

In conclusion, Ilkley should not be classed as a principle town.

City of Bradford Metropolitan District Council

www.brad.ac.uk

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.

Take into account the large number of re-developments that has taken part over the last ten years on existing house plots and also include the potential of a similar number of houses that will built over the life of this core strategy. Approximately 800 houses based on 500 over the last ten years.

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:

[Large empty box for answer]

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:

27/03/2014

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C; EQUALITY AND DIVERSITY MONITORING FORM