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### City of Bradford Metropolitan District Council

### 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.

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

Emailing us at:

Idf.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 legel 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,

2<sup>na</sup> Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

For your representation to be 'duly made' the Council must receive it no later than <u>5pm on Monday 31<sup>st</sup> March 2014</u>

### City of Bradford Metropolitan District Council

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## 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	Mr	
First Name		
Last Name	Hawkesworth	
Job Titte (where relevant)		,
Organisation (where relevant)	<u></u>	
Address Line 1 Line 2	—->>: /* <u></u>	
Line 3		<del>:                                    </del>
Line 4	likley	
Post Code	LS29	
Telephone Number		1
Email Address		
Signature:		Dafe: 28 <sup>th</sup> 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.

# City of Bradford Metropolitan District Council

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PART B - YOUR REPRESENTATION -	7 <b></b>	Oarate sheet for each	h sopres	entation
3. To which part of the Plan does this rep	21 1 2 1 2 1 1 1 2 1 N 2 2 2 2 2 2 2 2 2		· Virginal	
· · · · · · · · · · · · · · · · · · ·	Paragraph	Not the state of t		
<u> </u>	aregraph:		Policy	
4. Do you consider the Plan Is:				
4 (1). Legally compliant	Yeş		No	X
4 (2). Sound	Yes		No	×
4 (3). Complies with the Duty to co-operate	Yes	<del>04</del>	No	X
5. Please give details of why you consid		• · · · · · · · · · · · · · · · · · · ·	·	
Please see my submission attached				

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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.

	my submission attached
10.	
A.	
necessary t subsequen	e your representation should cover succinctly all the information, evidence and supporting information to support/justify the representation and the suggested change, as there will not normally be a copportunity to make further representations based on the original representation at publication stage, as precise as possible.
After this s	tage, further submissions will be only at the request of the Inspector, based on the matters he/she identifies for examination,
7. St your r	presentation is seeking a modification to the Plan, do you consider it necessary to participate real part of the examination?
at this t	
X	No, I do not wish to participate at the oral examination
	No, I do not wish to participate at the oral examination  Yes, I wish to participate at the oral examination
х	
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# City of Bradford Metropolitan District Council

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.

# Submission by Hawkesworth Ilkley

CONTRACTOR CONTRACTOR

Introduction. The implications of Bradford Council's Core Strategy ("the CS)" for Wharfedale in general and fikicy in particular are frighteningly destructive and ill thought out. The CS insofar as it affects Wharfedale would have a very negative impact on the district as a whole as well as Ilkley and the Wharfe Valley. To swamp the only attractive residential area in the district with mediocre houses (which is what would result if the CS were implemented as presented) would hardly help Bradford's regeneration effort.

The Green Belt. It appears that in producing the CS Bradford planning officers have failed to take independent professional advice about achieving policy objectives, and have instead relied on the views and proposals of potential developers and those advising them. The CS contains no rationale as to why existing green space protection is to be abandoned not is there any examination of whether housing numbers could be met from brownfield sites. The Ministeria! Statement of Nick Boles that housing need is not a sufficient reason to breach green belt boundaries casts doubt on the compliance and legal basis of the CS's proposals for Ilkley insofar as they involve breach of greenbelt boundaries. The CS must be modified insofar as it affects the greenbelt surrounding Ilkley by removing any reference to breaching greenbelt boundaries.

**Habitat.** The CS must be revised by a substantial reduction to or elimination of the number of proposed new dwellings for fikiey because of the Habitat Protection Regulations. The Habitat Survey relied on by the Council shows no strategic thought or intellectual rigor and does little more than pose questions, which it fails to answer. The CS as now produced has reduced proposed new housing by 500 units from the original proposals. This is an arbitrary figure. No justification is given for it in the CS. In the absence of any argument to the contrary, the CS must delete any reference to new housing units at Ilkley, simply because the 400 metre and 2.5 kilometre protection zones proclude the use of all the developable land in Ilkley. The only exception would be in-fill sites out of the protection zones.

Conclusion. The CS most be amended to remove all reference to breaching greenbelt boundaries at Ilkley and contain a statement that Habitat Protection Policies preclude any development on other than in-fill sites in Ilkley.

**28<sup>th</sup> March, 201**4