

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

The Council are seeking comments on the Proposed Main Modifications to the Core Strategy, following the Examination in Public in March 2015. The changes are proposed by the Council to address issues of legal compliance and soundness and we can only accept representations on these matters.

Comments on the Proposed Main Modifications Schedule are invited from **Wednesday 25th November 2015 until Wednesday 20th January 2016.**

REPRESENTATIONS MUST ONLY RELATE TO THE PROPOSED MAIN MODIFICATIONS.

You can access the Core Strategy documents online and additional copies of this form from our website: www.bradford.gov.uk/planningpolicy then 'Core Strategy Proposed Main Modifications', or you may request copies by:

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

Completed representation forms must be returned to Development Plans, by the deadline below, by either:

- **E-mail to:** planning.policy@bradford.gov.uk
- **Post to:** Core Strategy - Proposed Main Modifications
Development Plans Group
City of Bradford Metropolitan District Council
2nd Floor South - Jacobs Well
Nelson Street
Bradford
BD1 5RW

**ALL COMMENTS MUST BE MADE IN WRITING AND SHOULD BE RECEIVED
BY THE DEVELOPMENT PLAN GROUP AT EITHER OF THE ABOVE ADDRESSES
NO LATER THAN 4PM ON WEDNESDAY 20TH JANUARY 2016.**

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.

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

PART A: PERSONAL DETAILS

* If an agent has been appointed, please complete only the Title, Name and Organisation in box 1 below and complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)	
Title	councillor		
First Name			
Last Name	smith		
Job Title (where relevant to this representation)	Opp on HTP		
Organisation (where relevant to this representation)			
Address Line 1			
Line 2			
Line 3			
Line 4	Ilkley		
Post Code	LS29		
Telephone Number			
Email Address			
Signature:	Smith	Date:	17 Jan 2016

3. Please let us know if you wish to be notified of the following:

The publication of the Inspector's Report?	Yes	yes	No	
The adoption of the Core Strategy?	Yes	yes	No	

Are you attaching any additional sheets / documents that relate to this representation?	Yes		No	no
	No of sheets / documents submitted :			

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

PART B – YOUR REPRESENTATION - *Please use a separate sheet for each representation.* (Additional Part B forms can be downloaded from the web page)

4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

See below.

5. Do support or object the proposed main modification?

Support

Object

yes

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

no

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

no

8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

no

Justified

no

Effective

no

Consistent with National Planning Policy (the NPPF)

no

9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to the proposed main modifications).



Comments on
Main modifications.do

Cllr [redacted] Smith's Comments on Main modifications to the Core strategy MM1,2

It is clear that the overall strategy is misconceived in that the Airedale and Wharfedale objective 2 to maintain the existing settlements is completely disregarded and damages the environment due to insufficient use of Brownfield ,windfall sites, already approved applications [un built] while redundant homes are vacant and old homes over lock up shops, where these are now lock ups are not even considered to there fullest opportunity and for not using the sustainable land available [50% of Brownfield usage is below the governments suggestion of

over 80%]. Some additional homes in the Wharfe and Airedale Valleys can be accommodated but not at the levels suggested and not when there is sufficient scope in the city and periphery of same. Definitely the Core Strategy is short on strategic housing, commercial and infrastructure solutions in a cohesive fashion.

MM7,52

The designation of Burley-in-Wharfedale and Menston as Local Growth Centres and Ilkley as a Principal Town are incorrect because any marked increase in numbers of homes will stretch further the lack of school places and access to transport and other infrastructure.

MM12,18,38-47,51,96,

The Government is saying Brownfield first yet the Core strategy document is biased in forming a greater percentage of the homes in green belt and is not sustainable due to the already saturation of services. Especially the lack of train station parking in Ilkley, Burley and Menston a result of which we have an inordinately high street and pavement parking problem.

The Allocations DPD has already commenced ahead of the consultation on the Major Modifications to be consulted upon. Recent flooding has shown the error of planners approval of flooded homes in the flood plain as previously assessed and this needs to be reviewed in the light of the recent expansion of the flood plain. Land earmarked in the Core strategy will show that the Strategy needs a complete review.

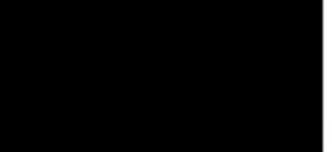
MM23,25,28,33,115/17

The Environmental Assessment and SPA/HRA needs to be assessed by an independent assessor as the closeness of Ilkley Moor to Ilkley and Burley is important and is also relative to areas in the Aire Valley. New homes too close to the Moor will damage the Moors eco system.

MM34,127,128,

The Infrastructure analysis on roads, buses and trains is not sufficiently sound as assessed against the proposal in the core strategy for 42k homes by 2020 in Bradford [based on the 2012 census which in Bradford is shown to be slowing down of population increase]. The problems of recent flooding has resulted in diversion of traffic from the A59 onto the A65 through Ilkley and villages has been extremely disruptive never mind the increase in pollution which occurred.

Note: Wharfedale and Airedale are remote areas of Bradford Met District and the cost to a future affordable residents living budget to travel into Bradford and Leeds would be too expensive to maintain a home. The councils academic assessment of its needs prior to the Local plan consultations is not conducive to getting unanimity on the needs of residents. This Academic Core Strategy Document is not in a style of language conducive to the publics ease of understanding and is against the principal of the Localism Act 2011 Local needs assessment. Therefore this Core strategy is not a credible document on many levels. There is significant land banking of 4800 sites at the moment and when added the increase use of Brownfield sites, homes over shops, unoccupied homes and especially the windfall sites a further 1000 in Ilkley which is already full within the greenbelt restrictions never mind other areas then the 42k required is clearly set way too high and around half this figure can be achievable.

Cllr  Smith Opposition spokesman for Housing, Transport and Planning.

10. Please set out what changes you consider necessary to make the proposed main modification legally compliant or sound, having regard to the test you have identified at Q7 above.

You need to say why this change will make the proposed main modification 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.

Document and modifications show a complete lack of understanding of the communities that live in our district and the infrastructure and needs of school places, highways, drainage capacity [floods] in fact it wonders if officers have visited the areas and this is just a web page assessment. It is completely void of humanity.

11. Signature:

Smith Cllr

Date:

17 Jan 2016

Thank you for taking the time to complete this Representation Form.