

## 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 25<sup>th</sup> November 2015 until Wednesday 20<sup>th</sup> 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](http://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](mailto: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](mailto:planning.policy@bradford.gov.uk)
- **Post to:** Core Strategy - Proposed Main Modifications  
Development Plans Group  
City of Bradford Metropolitan District Council  
2<sup>nd</sup> 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 20<sup>TH</sup> 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.

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### 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)
<b>Title</b>	Mrs	
<b>First Name</b>		
<b>Last Name</b>	Brown	
<b>Job Title</b> (where relevant to this representation)		
<b>Organisation</b> (where relevant to this representation)		
<b>Address Line 1</b>		
<b>Line 2</b>		
<b>Line 3</b>		
<b>Line 4</b>	Ilkley	
<b>Post Code</b>	LS29	
<b>Telephone Number</b>		
<b>Email Address</b>		
<b>Signature:</b>		<b>Date:</b>

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

<b>The publication of the Inspector's Report?</b>	Yes	Yes	No	
<b>The adoption of the Core Strategy?</b>	Yes	Yes	No	
<b>Are you attaching any additional sheets / documents that relate to this representation?</b>	Yes		No	No
	<b>No of sheets / documents submitted :</b>		1	

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### 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:

MM81

#### 5. Do support or object the proposed main modification?

Support

Object

Object

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

Yes

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

X

Justified

X

Effective

X

Consistent with National Planning Policy (the NPPF)

X

#### 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).

I consider the decision to build 1000 new homes in Ilkley over the life of the Plan is unsound on every test above.

This modification is not 'positively prepared' or 'justified' in the light of objectively assessed infrastructure requirements for the following reason. The Plan states in (Section 3, para 15.3) that the spatial vision for Bradford will be achieved through a number of objectives including the following: 'Ensure that the appropriate critical infrastructure (including green and social) is delivered to support growth and the timing of development and infrastructure delivery are aligned'. However Ilkley has a number of critical infrastructure issues that need addressing yet are already acknowledged to be highly challenging, if not practically insurmountable, due to limited space and funding.

This modification is also not 'effective' or 'consistent with national policy' due the nature of the greenbelt land and flood plain it is proposed these houses should be built on. These significant concerns are evident within the LIP regarding flood risk and drainage (LIP, 5.5.1). As a local resident of Ben Rhydding (East) it is only too apparent how flooded the lower of the two pieces of land identified in the SHLAA

Update Report (May 2013: Map IL/014) has been over recent weeks and over many years. I therefore do not understand how development of this site in flood zone 3b is compatible with the Plan's statement that 'the SHLAA has, in line with the definitions within the NPPF, ruled as unsuitable any site falling within flood zone 3b, the functional flood plain' (5.3.4). If housing development is not allowed here then it puts pressure on building on other green belt areas such as (SHLAA, May 2013: Map IL/009). Building on this area would only serve to increase the risk of flooding to the area and lower flood plain.

Our personal experience as parents of young children in this area also bears out the critical state of school places in Ilkley highlighted within the Local Infrastructure Plan (LIP). Even with expanding Ashlands Primary School this still does not solve the issue for Ben Rhydding (East) families. For example we live 0.47 miles away from Ben Rhydding Primary School and even though it was our first choice and we are within the 'Priority Catchment Area', due to oversubscription from families in existing houses, we could not secure a place for our son to begin in Reception for the start of the academic year 2013. Other neighbours had also not been able to secure places at Ben Rhydding Primary School, in one case being required to drive their children seven miles away to a primary school in Silsden. We now face an eight mile return drive each day to school. Should the area identified on Map IL/009 be built on this would cause most of the new families in this development to be in the same situation regarding primary school places as we, and a number of our neighbours have been in, given there is no further educational infrastructure development planned. This is not a situation in keeping with the NPPFs aims of sustainable development.

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.

1. Remove Ilkley's designation as a Principal Town and make it a Local Service Centre with the more sustainable level of development associated with such a designation.
2. Protect the green belt as a major element of what makes the area special as well as protecting precious habitats, wildlife and the tourism economy.
3. Given the intractable problems associated with major areas of infrastructure, not least education and flooding, significantly reduce the number of proposed houses from the original pre-HRA target of 800 to only allow very limited further building on infill/windfall and brownfield sites over the life of the Plan in ways that support sustainability of infrastructure and environment.

11. Signature:

Date:

17/1/16

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