

## 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)	
Title	Mrs		
First Name			
Last Name	Scott		
Job Title (where relevant to this representation)			
Organisation (where relevant to this representation)			
Address Line 1			
Line 2			
Line 3	ILKLEY		
Line 4	West Yorkshire		
Post Code	LS29		
Telephone Number			
Email Address			
Signature:		Date:	18 January 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 :			



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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:

17, 18, 51, 52, 53, 54 55

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

Support

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'

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

Positively prepared

Justified

Effective

Consistent with National Planning Policy (the NPPF)

#### 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).

The increase in building is not justified or sound because the release of green belt land to provide long term houses and jobs does not take into consideration that Ilkley is a dormitory town providing housing for commuters who mainly work in Leeds and Bradford. There will only be exceptional circumstances for releasing green belt for housing if green belt is released for places of employment. To say that we need more local employment facilities is ignoring the character and purpose of the town and its environment. Employment and housing are required where the jobs are and these jobs are in the city areas. Ilkley needs moderate small scale development supported by good affordable transport links to the surrounding larger towns and cities, eg, Bradford, Leeds, Keighley, Skipton and Harrogate,

The Wharfe Valley is already over populated for the present infrastructure, all travel links are highly congested, the proposals are bound to ruin areas of natural beauty. I disagree that Addingham has



benefited from 'good' bus connections. Pensioners in sheltered housing, up a steep hill, have had to rely on a very irregular privately run shuttle bus to the village which has since been cancelled and buses to Skipton do not run at times suitable to get workers and school/college students home.

In the past the Council have not supported Ilkley, for example FE students are required to travel to Bradford, Keighley or Skipton on poor transport links leaving parents to cope with this short fall. I fail to see how the Council can influence this situation.

The Government's own policy regarding green space around communities was declared by Eric Pickles on 17 September 2012. "The green belt is an important protection against urban sprawl, providing a green lung around towns and cities". Also see NPPF paragraphs 80, 81 and 82. Building for building sake in Wharfedale when there are appropriate brown field sites in Bradford does not follow the Governments own policy.

Wharfedale will not accommodate 2,500 in fact Wharfedale is already unable to cope and 1,600 dwellings will put considerable strain on the infrastructure. School places are and have been scarce for many years. It is hard to understand why new employment land is required in Ilkley when the majority of residents commute to Leeds and Bradford for employment.

**MM17, Exceptional circumstances:** It is clear that there is a need for new houses in the Leeds/Bradford/M62 corridor areas and using non green field sites, for new development, would make sense. If the criteria of 'exceptional circumstances' is relaxed it is clear that green field sites in the Ilkley area will be used for expensive high profit development thus not meeting the needs of the community and not being sustainable by the infrastructure of the town.

There has been a great deal of infill development in Ilkley since this proposal began and it is not clear to me if these dwellings will be counted in the 1,000 proposed homes. It is important to maintain the character of Ilkley and the surrounding countryside. I have not seen any evidence that the Council have supported this in the past as volunteers have been responsible for footpaths on the moors and the Manor House museum.

**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.**



I question the legality of independent research carried out by GVA for the Bradford Core Strategy. The criteria states all research should be carried out by an independent body. GVA is a multinational company with worldwide offices and their core business is large scale building development and project management which means they have a vested interest in producing plans for substantial development. How can GVA be viewed as an independent resource? The provider of the research should be changed.

Ilkley needs small scale development, particularly infill development, some of which has already taken place over the last few years and not counted in the projected numbers.

There are too many developments given over to affordable retirement properties thus reducing the land available for affordable homes for younger people. For example the recently acquired site of Spooner industries by McCarthy and Stone. At a time when Bradford are carrying out this Core Strategy Development Plan to build sustainable homes/employment sites for working age people, was this a wise planning decision? How many retirement homes v affordable homes are in the plan?

What exactly does affordable homes mean? This should be specifically explained.

Also some of the green field sites suggested for development have recently suffered severe flooding with moorland streams sufficing and causing disruption. Has the plan taken into consideration development of flood proof homes?

I feel completing this procedure has been too daunting for the lay-person and is designed to deter the residents of this town from having their say. I feel discriminated against and unable to carryout this exercise in the way you would wish. Having said this my view and many others is that to build on the green belt surrounding Ilkley would be a grave mistake and ruin this unique environment for generations to come. There must be a more practical way of providing housing for an increasing population in Bradford.

11. Signature:

Date:

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