

## 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:

MM51

### 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 a proposed main modification).

Development allocations for Wharfedale set out in the CSPD in March 2014, which involved significant loss of green belt and other open land, were considered to risk serious damage to the environment, landscape character, heritage value and tourism/economic assets of the affected settlements. Strong representations on this were made by many groups during previous consultation rounds and at the public inquiry.

MM51 (and related Modifications) now proposes a 56% increase in development allocated to Wharfedale.

This clearly intensifies the risks identified above, is contrary to NPPF policy on green belts and sustainability, and renders the modification (and the plan) UNSOUND.

The damaging allocations to Wharfedale settlements are set within the overall housing requirement for

the District, which as stated in other representations from ACS and many other local interest groups is fundamentally unsound and unrealistic,

ACS strongly supports representations submitted by other groups in Wharfedale relating to the damaging effects which the plan would have on Ilkley, Burley and Menston, and therefore to the unique and highly-valued, nationally/internationally-renowned environment of the Wharfe Valley as a whole.

The unchanged allocation for Addingham of 200 houses is welcomed as manageable if implemented sensitively in order to avoid similar damage to the landscape and heritage character of the settlement.

(See representation on MM96)

**10. Please set out what changes you consider necessary to make the proposed main modifications 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.**

Development allocations to Wharfedale should fully recognise the landscape, heritage, tourism and economic assets of the area and its settlements, and should be set out only following a fundamental revision to the District housing requirement along with the results of further work/policy revisions relating to flood risk, habitat/protected species impacts and comprehensive green belt review.

11. Signature:

Date:

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