

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.

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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	Professor		
First Name	[REDACTED]		
Last Name	Pilling		
Job Title (where relevant to this representation)			
Organisation (where relevant to this representation)			
Address Line 1	[REDACTED]		
Line 2	Ilkley		
Line 3			
Line 4			
Post Code	LS29 [REDACTED]		
Telephone Number	[REDACTED]		
Email Address	[REDACTED]		
Signature:	[REDACTED]	Date:	19.01.2016

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

The publication of the Inspector's Report?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Core Strategy?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Are you attaching any additional sheets / documents that relate to this representation?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	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:

MM88

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).

1. The decision to increase the number of houses to be built in Ilkley, as a result of the revised HRA, is unjustified. Ilkley is a small town of considerable local and national importance, on the edge of a National Park, an AONB and the South Pennine Moors SAC and SAP. It is also, as a former spa town, a considerable tourist attraction. The overall plan proposes to preserve and enhance heritage assets – it is not clear that this aim is compatible with the proposed changes in Ilkley.
2. Ilkley suffers considerably from excessive through and local traffic, with substantial parking problems; local traffic would be considerably increased by such a massive housing development. It is good to see that rail links will be improved, but this will only exacerbate parking because Ilkley is a terminus.

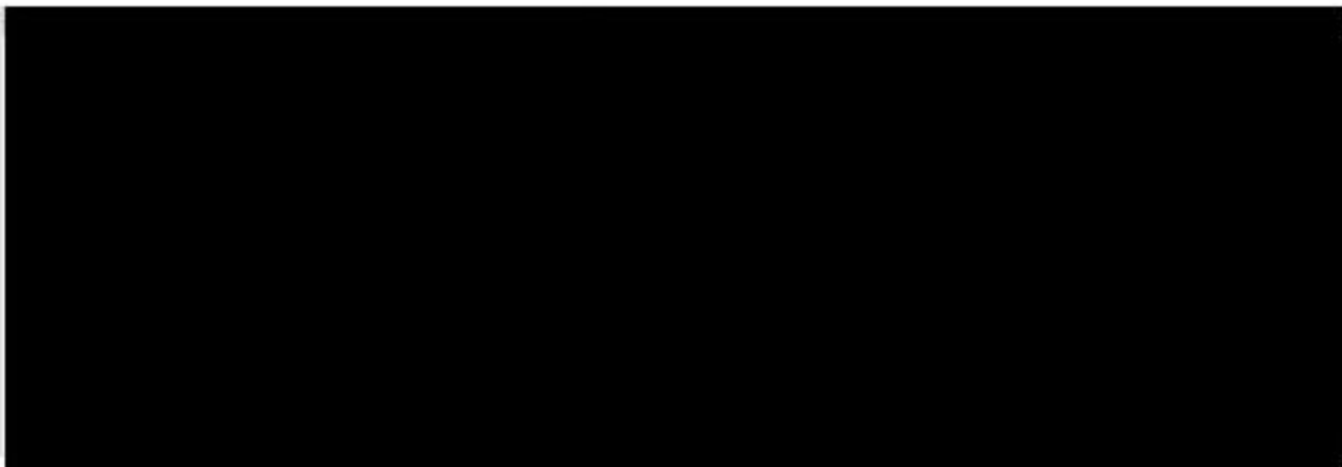
3. School provision will be a problem even without increased house numbers. No progress has been made on this issue, despite the severity of the current position. Policy WD1 Criterion B refers to the provision of new schools as required. The record of school and especially secondary school development in Ilkley is not reassuring.
4. Climate Change is clearly having a substantial impact on flooding, especially in areas with moorland catchments, like Wharfedale. It is essential that no building takes place on the excellent flood plain provision in Ilkley, but also that any removal of farmland at higher levels does not exacerbate run-off from the moors by replacing absorbing grassland with impervious concrete and tarmac. The Adaptation Sub-Committee of the UK Committee on Climate Change has stated that Local Authorities have a duty to provide green spaces for absorbing heavy rain and to locate new buildings away from flood risk areas as much as possible. The Strategy and its modifications make numerous references to flood alleviation and risk management. Some of the potential sites identified in Ilkley are not consistent with this aim. It is essential that flood alleviation is central to any decisions.

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.

The number of houses to be built in Ilkley, as set out in MM88, should be reduced significantly. I argued in March 2014 that 800 houses are too many.

11. Signature:



Date: 19.01.2016

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