

Core Strategy Development Plan Document

Proposed Main Modifications – November 2015

Representation Form

NOTE: SECOND SUBMISSION

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	Mr	
First Name	[REDACTED]	
Last Name	Elsegood	
Job Title (where relevant to this representation)		
Organisation (where relevant to this representation)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Menston	
Line 4	Ilkley	
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED] <i>Elsegood</i>	Date: 19 January 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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
	No of sheets / documents submitted :		5 including this page	

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For Office Use only:	
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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:

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)

Where x identifies the test which, in my opinion, the proposals DO NOT satisfy.

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 "housing need" figures, predicated (originally) on the hypothesis that Bradford would create 4,424 jobs per annum, and that these jobs would cause inward migration, is now demonstrably flawed and was at all times an excessive estimate. In an earlier revision, this forecast on new jobs was reduced to 2,897 per annum, but the "housing need" was not correspondingly adjusted. NOW you state, in MM65, 66 and 67, that the number of new jobs will be **"an average of approximately 1572 jobs annually."** On the basis of the Regional Econometric Model Projection, there is now absolutely **NO JUSTIFICATION FOR ANY "EXCEPTIONAL CIRCUMSTANCES" UNDER WHICH GREEN BELT DELETIONS COULD BE SOUND POLICY.**

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.

It is time to start from an admission that **Bradford has an adequate supply of brownfield land inside the City** boundary to meet the requirements for future housing, if that was based on a realistic assessment of employment requirements/job opportunities and population forecast, but it is not.

The numbers which were forecast for employment in Bradford District are aspirational to a degree which is **unrealistic**, and it follows that the District will continue to experience net OUTWARD migration relative to employment. Bradford risks creating a 'doughnut city' by displacing population to the suburbs (by neglect or perverse policy) and leaving the centre to become an economic and social vacuum. One of the effects of such displacement would be to increase the need for commuting to places where there **IS** employment, and that will be environmentally damaging as well as unsustainable in terms of the existing transport infrastructure.

11.
Signature:

Elsegood

Date:

19 January 2016

NOTE: I consider this form, and the manner of its completion, to be designed to inhibit effective representation. It is unreasonable to expect residents to submit positive recommendations to make these Main Modifications compliant when CBMDC has all the resources to do so, but chooses simply to advance dogmatic policies.

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Where *x* identifies the test which, in my opinion, the proposals DO NOT satisfy.

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

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Policy EC3 is UTTERLY DISCREDITED. Para. 5.1.14 of the Core Strategy commenced by basing the need for employment land on a “target” figure of 4,424 new jobs per annum, but recognised this as unrealistic. The projected requirement for employment land was thus reduced to “an average of 2,897 new jobs per annum”. This has now been revised (see MM65,66 and 67) to “an average of approx.. 1,572 jobs annually.” On the basis of this revised projection, there is now **NO JUSTIFICATION FOR ANY “EXCEPTIONAL CIRCUMSTANCES” UNDER WHICH GREEN BELT DELETIONS COULD BE SOUND POLICY**. It follows that there is absolutely NO JUSTIFICATION for Green Belt deletions in Wharfedale to provide 5 ha. of employment land.

The “housing need” figures, predicated (originally) on the Bradford creating almost 4,500 jobs per annum, are manifestly flawed and excessive. With the estimate now reduced to approximately one-third of the original figure, the “housing need” and employment land requirements should also be correspondingly adjusted.

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.

It is time to start from an admission that **Bradford has an adequate supply of brownfield land inside the City** boundary to meet the requirements for employment land (and future housing) if that was based on a realistic assessment of employment requirements/job opportunities and population forecast, but it has not been based on realistic forecasting.

The numbers which were forecast for employment and population/household growth in Bradford District are aspirational to a degree which is **unrealistic**, and it follows that the District will NOT HAVE a “housing need” for 42,100 units over the Plan Period, nor will it need the area of employment land originally estimated. Given the nature of employment in Wharfedale (Para. 5.1.21) are shown as “Health, Financial and Business Services”, these do not require substantial areas of land for the provision or expansion of those forms of employment. It follows that Wharfedale does not need the volume of housing originally proposed, and hence **NO CONFISCATION OF GREEN BELT CAN BE CONSIDERED “SOUND POLICY”**.

Policy EC3 states that “Policy EC3 makes provision for selective green belt deletions using the exceptional circumstances allowed under Paragraph 83 of NPPF. The exceptional circumstances arise from the need to provide additional jobs through economic growth and inward investment ...”. There are now **NO SUCH EXCEPTIONAL CIRCUMSTANCES**”.

Bradford risks creating a ‘doughnut city’ by displacing population to the suburbs (by neglect or perverse policy) and leaving the centre to become an economic and social vacuum. The only significant job growth will be in the City of Bradford and in Airedale. **If that’s where the jobs will be, that’s where the houses for the employees should be**, otherwise displacement of the employees to outlying areas would increase the need for commuting to places where there **IS** employment, and that will be environmentally damaging as well as unsustainable in terms of the transport infrastructure.

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Signature:

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Date:

19 January 2016

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