

Submitting your representations on the Main Modifications

We will be submitting detailed representations on behalf of the Association to include input from our Public Meetings on 6th and 7th January 2015

However it is most important that our members submit their own views, highlighting their personal concerns. The forms which Bradford want you to use can be downloaded from this page on the Bradford website:

http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/proposed_modifications

The forms you need are the Representation Form and the Representation Form B (for use where you are objecting to more than one modification) which are found at the end of the section headed **“How to respond to the Main Modifications consultation”**.

Part A needs to be completed with your own details

Part B needs to be submitted for each subject group of objections.

We suggest that the two main groups of concern are:

- 1) **The Councils definition of “Exceptional Circumstances”** justifying its use of Green Belt land throughout the District, and of course particularly for the “Holme Wood Urban Extension” in the Tong Valley. You will need to specify in paragraph 4 of **Part B** the numbers **MM 17** and **MM18** and tick the “Object” box at paragraph 5, the “Unsound” box at Paragraph 7, and all the boxes at paragraph 8.
At paragraph 9 you may set out your concerns. Our concerns are that the need to meet housing targets does not override the purposes of Green Belt protection set out in the National Planning Policy Framework, that the need for employment land has not been sufficiently identified and is exaggerated, that the Bradford Growth Assessment did not provide adequate independent evidence supporting a land release at Tong and that the **Neighbourhood** Development Plan did not support the use of the Tong Valley for housing as there was overwhelming public opposition to the proposals. We say that the land at Tong Valley is so necessary to prevent Leeds and Bradford joining together as one urban sprawl that no exceptional circumstances can justify its release.
- 2) **The Council’s revised distribution of housing.** The Council has reallocated the distribution of housing. Refer at paragraph 4 to the following Main Modification numbers **MM38,MM 40,MM 42, MM72, MM79**. . Complete paragraphs 5, 7 and 8 as above except that in paragraph 8 the last box need not be ticked. The grounds specified in our objection are that the number of 6000 houses shown for SE Bradford should be reduced by 1800-2000 and that the reduced numbers in other parts of the City of Bradford which have reduced should not be reduced so extensively and/or that the numbers outside the City of Bradford which have been increased should be increased further to accommodate the reduction in SE Bradford. We say that an unfair and disproportionately high number of houses are being distributed to SE Bradford, and in particularly the Tong Valley, which is not sustainable in community terms and will not be adequately supported by the infrastructure envisaged.