



City of Bradford MDC
Core Strategy – Proposed Main Modifications Development Plans
2nd Floor (South)
Jacob's Wells
Nelson Street
Bradford
BD1 5RW

By Post & Email

15th January 2016

Dear Sirs

BRADFORD CORE STRATEGY MAIN MODIFICATIONS - RESPONSE

We represent Persimmon Homes (West Yorkshire) and were actively engaged in the Examination of the emerging Core Strategy for Bradford. Our comments are made in respect of the Proposed Main Modifications to the Core Strategy, put forward by the Council following the various sessions of the EiP plus dialogue with the Inspector (M. Pratt) and participants (notably CEG).

We are grateful for many of the modifications put forward in that they recognise much of what we have said in respect of the HRA and specifically the potential of the settlements of Ilkley and Menston to accommodate more growth. It is though regrettable that our comments in respect of Cottingley have been disregarded by the Council thus far, hence we invite you to reconsider.

We have set out in the table below the modification reference and our response to them at this stage. In all cases they should be read in the context of our EiP statements and previous representations, which we have not repeated for brevity and efficiency reasons.

| Mod ref | Comment |
|---------|---|
| MM1 | Support |
| MM2 | Support including Menston as a Local Growth Centre (LGC) |
| MM3 | Support removal of reference to Local Needs as was misleading |
| MM7 | Support addition of Menston |
| MM8 | Recognise need to delete Menston given above |
| MM9 | Support addition of Menston |
| MM10 | Support 'appropriate' provision in LGC's and Local Service Centres (LSC's) |
| MM11 | Support including Menston as a Local Growth Centre (LGC). OBJECT to failure to 'promote' Cottingley however, despite our previous comments |
| MM12 | Support removal of reference to Local Needs as was misleading |



| Mod ref | Comment |
|----------------|--|
| MM17 | Support the need to review the Green Belt (GB) in order to deliver housing and jobs |
| MM18 | Agree that exceptional circumstances exist to justify housing in the GB. See our previous representations in respect of the appropriate amount of housing and release |
| MM23 | Agree further assessment can take place at Allocations DPD stage in respect of SPA/SAC |
| MM24 | Agree need to retain flexibility over exact location, scale and nature of development |
| MM28 | Approach to Zones A, B and C appears reasonable. We would expect to assess the effects of development proposals on the foraging habitat |
| MM29 | Likewise we would expect to manage and mitigate both direct and indirect effects |
| MM33 | As above, agree we would need to consider how affects foraging habitat and to propose appropriate mitigation |
| MM35 | Acknowledge recreational impacts including trampling, erosion, effects of dogs etc need to be investigated |
| MM44 | OBJECT to failure to increase housing provision in Cottingley |
| MM46 | Support removal of reference to local need |
| MM51 | Support increase in housing targets for Ilkley (to 1,000) and Menston (to 600) |
| MM52 | Support increase in housing targets for Ilkley (to 1,000) and Menston (to 600); and reference to need for local GB changes |
| MM72 | Agree factors including deliverability should be considered and to the need for GB review. Support addition of housing market indicators, drivers and signals. Support uplift in housing need / target, details of which were set out in our EIP statements. |
| MM74 | Refer to our previous comments on the housing requirement and supply |
| MM75 | Support the change to the LGC / LSC housing requirement in lieu of Ilkley / Menston mods |
| MM81 | Support increase in housing targets for Ilkley (to 1,000) |
| MM83 | Support addition of Menston |
| MM84 | Support addition of Ilkley and Menston |
| MM85 | Recognise need to delete Menston given above |
| MM88 | Support increase in housing targets for Ilkley (to 1,000) and Menston (to 600). OBJECT to failure to increase housing provision in Cottingley |
| MM89 | OBJECT See previous comments made about phasing and whether it is needed / appropriate |
| MM91/ 92 | Support reference to the release of additional housing sites to meet the shortfall in the 5 year housing land supply, especially phase 2 sites. A significant step up should be achieved to address the obvious undersupply and pressing housing need |
| MM99 | Support regard being given to the viability of mix of housing proposed |

| Mod ref | Comment |
|---------|--|
| MM100 | Agree reference should be made her to Building Regulations as opposed to Code (CFSH) |
| MM107 | Our clients are actively engaged in the debate about National Space Standards which require careful consideration |
| MM113 | Noted the reference to a future SPD being produced to identify contributions and mitigation which could potentially work |
| MM152 | We OBJECTED to the use of the Liverpool method in our earlier representations |

We look forward to engaging further in the process and trust the Inspector will take our comments and duly made objections fully into account at the next stage.

Yours sincerely

[Redacted signature]

[Redacted] **HALL**
Partner

[Redacted]

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