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City of Bradford MDC

Core Strategy - Proposed Main Modifications Development Plans

2<sup>nd</sup> Floor (South)

Jacob's Wells

Nelson Street

Bradford

BD1 5RW

## By Post & Email

15<sup>th</sup> 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).

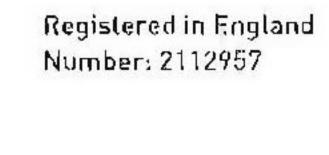
We are grateful for many of the modifications put forward in that they recognise much of what we have said in respect of the HRA and specifically the potential of the settlements of Ilkley and Menston to accommodate more growth. It is though regrettable that our comments in respect of Cottingley have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

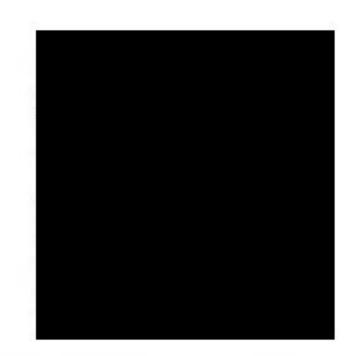
We have set out in the table below the modification reference and our response to them at this stage. In all cases they should be read in the context of our EiP statements and previous representations, which we have not repeated for brevity and efficiency reasons.

Mod ref	Comment
MM1	Support
MM2	Support including Menston as a Local Growth Centre (LGC)
ммз	Support removal of reference to Local Needs as was misleading
MM7	Support addition of Menston
MM8	Recognise need to delete Menston given above
мм9	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
ммзз	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

HALL

Partner

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