

## 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 25<sup>th</sup> November 2015 until Wednesday 20<sup>th</sup> 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](http://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](mailto: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](mailto:planning.policy@bradford.gov.uk)
- **Post to:** Core Strategy - Proposed Main Modifications  
Development Plans Group  
City of Bradford Metropolitan District Council  
2<sup>nd</sup> 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 20<sup>TH</sup> 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	Mr		
First Name	[REDACTED]		
Last Name	McQuillan		
Job Title (where relevant to this representation)			
Organisation (where relevant to this representation)			
Address Line 1	[REDACTED]		
Line 2	[REDACTED]		
Line 3	Ilkley		
Line 4	West Yorkshire		
Post Code	LS29 [REDACTED]		
Telephone Number	[REDACTED]		
Email Address	[REDACTED]		
Signature:	[REDACTED]	Date:	18 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 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:

MM 17

### 5. Do support or object the proposed main modification?

Support

Object

Object

### 6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

No

### 7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

No

### 8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

No

Justified

No

Effective

No

Consistent with National Planning Policy (the NPPF)

No

### 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 strategy fails to recognise the importance of Green Belt land as set out in NPPF. The Council seems to believe that by meeting its overall self-imposed housing target this creates an 'exceptional circumstance' for releasing Greenbelt land of the scale proposed in Burley, is unbalanced and flawed.

The Council's own policy (SC7) refers to 'a selective review of Green Belt boundaries in locations that would not undermine the strategic function of green belt within the Leeds City Region and that would accord with the Core policies and the strategic patterns of development set out in Policy SC5'.

The scale of greenbelt releases in Wharfedale is significant and will weaken its strategic function in this area. In particular, the Council must understand that to release land for 700 dwellings in Burley will, in the main, require the release of considerable greenbelt land.

At the public hearing held in March to which I gave evidence, it was clear that the Council did 'an about turn' when cross-examined by landowner's and developer's lawyers in Burley over its HRA approach. The new increase from 200 dwellings to 700 dwellings is blatantly excessive, unjust, and disproportionate. The consequence is to roll back the greenbelt significantly, damage the landscape character of Wharfedale, and intensify future



development through Burley being designated as a local growth centre. This proposal by the Council is an unwarranted attack on the people of Burley and of the Parish Council in putting together its own Neighbourhood Plan. It sets local opinion at odds with District requirements. That top-down approach undermines the local Neighbourhood Plan process fundamentally.

Greenbelt also plays its part in conserving the special landscape of Wharfedale. On the north side, this is recognised as an area of outstanding natural beauty. On the south side, only greenbelt policy holds back excessive development. The Council's own adopted Landscape Character Assessment (October 2008) refers to 'limited scope for new development'. I refer to para 5.6 below:

Para 5.6 Landscape Character Assessment Supplementary Planning Document Vol. 8 Wharfedale

'Opportunities for new development in Wharfedale are limited by the need to preserve the sharp edges of the existing settlements. The retention of the separate identity of the existing towns and villages through physical separation should be a long term aim. Additional woodland planting around the settlements will help to contain new development. Any new proposals in Wharfedale should also be assessed for their impact on the busy road network along the valley and across the valley slopes towards Airedale, to avoid adversely affecting the attractive quality of life of both residents and visitors'.

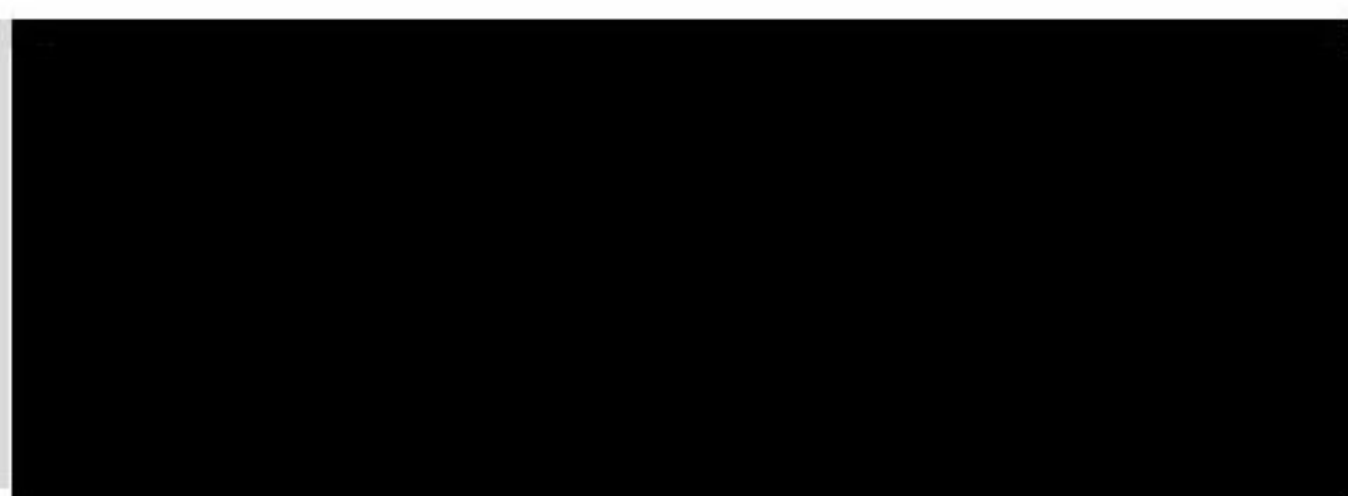
However this statement is ignored because of the all consuming desire of Bradford Council is to build over 40,000 dwellings.

**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.**

In order to rectify the Council's unbalanced approach to land release in Burley, leading to excessive greenbelt releases, the proposed allocation of 700 dwellings should be reduced to 250-300 dwellings. The Parish council is preparing its Neighbourhood Plan based on 200 dwellings. That figure of between 250 and 300 is in my view a good reasonable compromise, balancing local views and overall district need. In that figure, it should include the proposed dwellings at Greenholme Mills and Burley House.

11. Signature:



Date: 18 January 2016

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