

## Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

**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:

MM38, MM42, MM77, MM82 and MM87

### 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

n/a

No

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

Yes

No – 'unsound'

unsound

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

Positively prepared

Not positively prepared

Justified

Not justified

Effective

Not effective

Consistent with National Planning Policy (the NPPF)

### 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 a proposed main modification).

1. We welcome the reduction within policy HO3 in the numbers of dwellings shown to be distributed to the Regional City of Bradford, which partially results from a higher distribution within the Wharfe Valley.
2. However the revised distribution highlights the unsoundness of the distribution pattern within the Regional City of Bradford, as there has been no reduction in numbers shown for SE Bradford which remain at 6000. The reduced total for the Regional City now places 21.62% of the new homes for the Regional City in SE Bradford.
3. In our previous representations we said that the Core Strategy was unsound because it placed too high an emphasis on housing development in SE Bradford, where there was not a high

level of housing demand, where the market did not and would not support housing development on the scales proposed, and most particularly where the infrastructure could not, within reasonable time scales, be brought up to the levels needed. The increased proportion of houses to be distributed to SE Bradford resulting from these Main Modifications, produces a wholly unjustified and unsustainable shift of housing pattern for the City.

4. We note that the numbers of homes proposed for the Regional City of Bradford has been reduced overall by 900. But, we think that that reduction could be greater, particularly as the constraints against development in the Wharfe Valley have been relaxed. We see no good reason why the Ilkley distribution should not be brought back to at or above the baseline figure (see MM82)
5. Our view, expressed in previous representations, at the Examination, and repeated here, is that the numbers in the Distribution for the Regional City of Bradford should be adjusted by a reduction in the SE Bradford total of at least 2000, by an increase in the numbers for the City Centre and Shipley and Canal Road Corridor (as suggested by Kris Hopkins MP when Minister for Housing) and by a much lower cut in the distribution attributed to Shipley. This would produce an outcome which more accurately reflects the District's needs, which shares the burdens as well as the benefits of housing growth more equitably and which results in Green Belt release of a less concentrated and damaging nature.
6. The proposed distribution shown in the revised numbers included in the Main Modifications makes significant reductions in the Regional City of Bradford in areas which do not require significant Green Belt adjustment and does not make any reduction in the Bradford SE numbers which are almost wholly sensitive to Green Belt release. This indicates that the Council is not at this stage following a policy of first seeking to distribute housing to available brownfield or greenfield sites before seeking incursions into the Green Belt, and throws into question the seriousness with which it views the Green Belt function in SE Bradford.
7. In the consultation process, going back to the presentation by planning officers at Holme Wood Library in 2009, the Council justified its need for at least 2000 houses in key Green Belt land in Tong Valley (inter alia) as being driven by the absence of suitable sites in the "more popular areas" in the Aire Valley and Wharfedale. These sites are now available, as certain constraints have been removed. One of the planks of the Council's argument in 2009 has been removed and yet the Council has not responded by adjusting the distribution numbers to reduce Green Belt incursion in SE Bradford.
8. At the Examination hearing, within a very brief time of being asked to do so by the Inspector, the Council came up with revised distribution figures, which showed that there were alternative options available to it to redistribute houses into other parts of the District without reducing the numbers overall. It is clear therefore that the distribution pattern for the Regional City is one of choice and not of necessity.
9. We see no justification for the very substantial reduction in the number of houses to be distributed in Shipley, which is explained at MM42 by reference to the World Heritage Site at

Saltaire, the protection of which can in our view be achieved without such a substantial reduction. The figure for Shipley should be brought back nearer the original proposed.

10. The reduction in the figure for Shipley and Canal Road Corridor of 100 is not explained, but our contention has been that there is adequate capacity for the overall figure for the Canal Road Corridor to be increased in line with the numbers suggested by the then Minister of Housing quoted in our original representations.
11. In respect of MM82 we note with interest that Bradford has found it possible to increase the distribution for Silsden, which strengthens our view that its original figures contained an element of flexibility.
12. In the last two years there has been a major change in shopping patterns with a far greater emphasis on online retail. The opening of the Westfield Shopping Centre, since the close of the Examination hearing, has also produced an effect on city centre retail offerings. The consequences of these changes are that there is a far higher opportunity for applying changes of use and bringing housing back into the City Centre than is reflected in the distribution number of 3500, and we believe that that number could also be revised upwards.
13. None of the supporting documents, not even the Bradford Growth Assessment, indicate that there is a demand within the Regional City for a housing migration on such a scale as is proposed in the Core Strategy to the southern fringes of the City.
14. We believe that the Council should now take this opportunity to review its reliance on the urban extension at Holme Wood and produce a distribution within Policy HO3 which assumes less ambitious growth at that location and concentrates on more readily achievable and productive growth further north within the District.

**10. Please set out what changes you consider necessary to make the proposed main modifications 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.**

The numbers in the Distribution for the Regional City of Bradford should be adjusted by a reduction in the SE Bradford total of at least 2000, and that number redistributed by an increase in the numbers for the City Centre and Shipley and Canal Road Corridor and by a much lower cut in the distribution attributed to Shipley. The numbers in Wharfedale and Airedale also include capacity for some increase.

11. Signature:

**Finnigan**  
For and on behalf of  
the Tong and Fulneck  
Valley Association

Date:

17 January 2016

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