

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:

MM72

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 – Duty to co-operate not fulfilled in respect of Green Belt issues

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. In respect of the new paragraph 5.3.16 *“Having regard to evidence....the Council considers that the level of need can be accommodated and delivered”*. We do not see how the Council can properly come to this conclusion, as it has not yet given consideration to the views of neighbouring authorities on Green Belt release.
2. A key part of the Core Strategy relies upon the delivery of 2000 new homes in Green Belt land at the most sensitive part of the Green Belt interface between Leeds and Bradford where the Tong Valley meets the West Leeds Country Park.
3. At an earlier stage in the preparation process Leeds indicated that it opposed these plans.
4. In evidence to the Examination a former Leader of Leeds City Council and current leader of the Conservative Group on the Leeds City Council made clear his group’s opposition to the release of Green Belt land at this point. It is not inconceivable that the political balance in Leeds will change again.
5. Bradford has said that it will engage in consultation with Leeds over the proposals under its duty to co-operate, but it was clear at the Examination that it had not done so prior to delivery of the Publication Draft for Examination, and it does not yet seem to have done so.
6. It would be perfectly legitimate for Bradford to acknowledge (and we would encourage it to state so) that there is a huge contingency over this statement at 5.3.16, namely that it has not secured the release of the necessary Green Belt land and that there are substantial concerns about whether it should do so.
7. The Council relies on the Bradford Growth Assessment as *“evidence”* in support of its consideration of *“the need for and implications of green belt changes”*, but as we have pointed out in our earlier representations the Bradford Growth Assessment gives only limited support for development in the Green Belt at Holme Wood, based upon an incorrect belief that the proposals had already received support through a consultation process on the Tong and Holme Wood Neighbourhood Development Plan, when in fact the reverse was the case, and cannot be regarded as evidence in that regard.

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 statements in 5.3.16 should be qualified by the removal of the word “considers” where it appears and its replacement with the word “hopes”.
The word “evidence” should be removed and substituted by the words “secondary documents commissioned by it”

11. Signature:	[Redacted] Finnigan For and on behalf of the Tong and Fulneck Valley Association	Date:	17 January 2016
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Thank you for taking the time to complete this Representation Form.