Dated: January 2016

Representations to City of Bradford MDC Core Strategy DPD - Proposed Main Modifications – November 2015 with Specific Reference to Land at Hag Farm Road, Burley in Wharfedale SHLAA Reference BU/004

On behalf of

[redacted] Rothery

Prepared by

I D Planning
[redacted]
Leeds
LS1 [redacted]

CONTENTS

APPENDICES

1.0 Introduction

1.1 Following instructions from [redacted] Rothery, ID Planning are commissioned to make representations to the emerging Bradford Core Strategy DPD and the proposed modifications issued for consultation in November 2015.

1.2 These representations are made in the specific context of the development potential of land at Hag Farm Road, Burley in Wharfedale, SHLAA Reference BU/004.

1.3 It should be noted that [redacted] Rothery holds the freehold interest in the sites in question and the areas of land that are being promoted for development are shown on the attached plan at Appendix 1.

1.4 A robust assessment of the main modifications to the Core Strategy DPD have been undertaken and these representations seek to make comment on the main modifications in order to promote the site for a proposed housing allocation during the preparation of the subsequent Allocations DPD.

2.0 Representations to the Core Strategy DPD Proposed Main Modifications

2.1 These representations have been prepared in relation to the City of Bradford MDC Core Strategy DPD proposed modifications of November 2015. We seek to examine the relevant proposed main modifications pertinent to the subject site and to comment in line with the requirements of National Guidance as set out below.

National Planning Policy

National Planning Policy Framework (NPPF)

2.2 The National Planning Policy Framework was published on the 27th March 2012. As the Core Strategy DPD main modifications were issued for consultation in November 2015, the document should wholly reflect the National Planning Policy Guidance set out within the NPPF.

2.3 Paragraphs 150-185 of the NPPF relate to plan making. Paragraph 151 advises that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and therefore should be consistent with the principles and policies set out in the framework, including the presumption in favour of sustainable development.

2.4 Paragraph 154 requires plans to be aspirational but realistic. Paragraph 178 advises that public bodies have a duty to cooperate on planning issues that cross boundaries, particularly those which relate to strategic policies.

NPPF Tests of Soundness/European SEA Directive and Environmental Assessment of Plans and Programmes Regulation 2004

2.5 The Core Strategy inspector will consider the proposed main modifications on the basis of whether they have been prepared in accordance with the duty to cooperate, the legal and procedural requirements and whether they are sound.

2.6 Paragraph 182 of the NPPF advises: -

"The Local Planning Authority should submit a plan for examination which it considers is 'sound' – namely that it is: -

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements for neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and

- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the framework."

2.7 In addition, the representations will consider the legal duty to comply with the European SEA Directive – 2001/42/PC and the Environmental Assessment of Plans and Programmes regulations 2004. The directive and regulations require the need for: -

1. Environmental reports to be of sufficient quality and provide proper information to allow consideration of all potential effects.
2. Sufficient detail to allow the public to understand why the plan is said to be sound
3. An appropriate and equal assessment of the alternatives to the chosen strategy/policy an explanation as to why they were not considered to be the best option

Representations on Main Modifications

Main Modification 2

Summary of Main Modification

2.8 Main Modification 2 seeks to add Burley in Wharfedale and Menston to the list of Local Growth Centres in Policy SC1 Part B5 where the policy offers to support, protect and enhance the roles of the Local Growth Centres as hubs for the local economy and housing etc.

2.9 These modifications reflect the revised settlement hierarchy and changes within Policy SC4 which, in turn, reflects the revised Habitat Regulations Assessment and the increased housing targets proposed for Burley and for Menston.

Soundness of Main Modification 2

2.10 Mr. Rothery **supports** the Council's inclusion of Burley in Wharfedale and Menston within the list of Local Growth Centres in Policy SC1 Part B5.

2.11 Mr. Rothery considers that the inclusion of Burley in Wharfedale and Menston within the Local Growth Centres that act as hubs for the local economy is **sound** and that it meets the four tests of soundness in that this main modification has been positively prepared, is justified, is effective and consistent with National Policy based on the adjustments to the settlement hierarchy derived from the amendments to the Habitat Regulations Assessment.

Main Modifications 7, 8, 9, 11 and 12

Summary of Main Modifications

2.12 Main Modification 7 seeks to add Burley in Wharfedale and Menston to the list of Local Growth Centres in Policy SC4. Parallel Main Modification 8 seeks to remove Burley in Wharfedale and Menston from the list of Local Service Centres and Rural Areas from Policy SC4.

2.13 Main Modification 9 seeks to identify that Burley in Wharfedale and Menston when assessed against the outcomes table for Policy SC4 will have made a significant contribution to meeting the districts needs for housing, employment and associated community facilities.

2.14 Main Modification 11 seeks to identify that Burley in Wharfedale and Menston are Local Growth Centres on the key strategy diagram and also identifies that they are "the most sustainable local centres which provide an important focal point for affordable housing and market housing needs as well as employment. Parallel Main Modification 12 seeks to remove Burley in Wharfedale and Menston from the list of settlements where there will be a slower pace and scale of growth.

2.15 All of these modifications result from the revised status within the settlement hierarchy of Burley in Wharfedale and Menston as explained earlier as a direct result of the revisions to the Habitat Regulations Assessment.

Soundness of Main Modifications 7, 8, 9, 11 and 12

2.16 Mr. Rothery **supports** the Council's inclusion of Burley in Wharfedale and Menston within the list of Local Growth Centres subsequent main modifications to the policies and paragraphs of the Core Strategy as set out above.

2.17 Mr. Rothery considers the main modifications resulting from the revised status within the settlement hierarchy of Burley in Wharfedale and Menston are **sound** and that they meet the four tests of soundness in that the main modifications have been positively prepared, are justified, are effective an consistent with National Policy based on the adjustments to the settlement hierarchy derived from the amendments to the Habitat Regulations Assessment.

Main Modification 18

Summary of Main Modification

2.18 Main Modification MM18 seeks to amend paragraph 3.102 under Policy SC7 relating to Green Belt and the requirement for its release to meet the housing needs for the area. The modification states that the Council considers, having reviewed the evidence and all reasonable alternatives, that exceptional circumstances exist which justify and require a change to the Green Belt in order to meet its development needs for housing in full and in order to support long term economic success to the district.

Soundness of Main Modification MM18

2.19 Mr. Rothery **supports** the inclusion of clarity on the exceptional circumstances which support the need to review the Green Belt as proposed within Main Modification MM18.

2.20 Mr. Rothery considers that the inclusion of clarity in relation to the exceptional circumstances relating to the release of Green Belt is **sound** and that it meets the four tests of soundness in that the main modification has been positively prepared, is justified, and is effective and consistent with National Policy.

Main Modification MM51

Summary of Main Modification

2.21 This Main Modification seeks, in accordance with Policy HO3 and EC3 to increase the housing requirement in Wharfedale from 1,600 to 2,500 dwellings. In addition, it seeks the following broad distribution: -

- Ilkley – increase of dwellings from 800 to 1,000
- Burley in Wharfedale – increase of dwellings from 200 to 700
- Menston – increase of dwellings from 400 to 600
- Addingham – maintained at 200

Soundness of Main Modification MM51

2.22 Mr. Rothery **supports** the Council's increase of the housing requirement for Wharfedale from 1,600 to 2,500 and the subsequent increase in the housing targets for Ilkley, Burley in Wharfedale and Menston.

2.23 Mr. Rothery considers that the increase in the housing requirement for Wharfedale and the increase of the number of residential units for three of the four settlements is **sound** and that it meets the four tests of soundness and that this main modification has been positively prepared, is justified, is effective and consistent with National Policy based on the adjustments to the settlement hierarchy derived from the amendments to the Habitat Regulations Assessment.

Main Modification MM88

Summary of Main Modification

2.24 This Main Modification seeks to adjust Policy HO3 and the apportionments between the different settlements of the district for housing. It seeks to increase the housing delivery in Local Growth Centres from 3,400 to 4,900 and identifies that Burley in Wharfedale will deliver 700 units and Menston 600 units. It also identifies that Burley in Wharfedale and Menston are to be deleted from the Local Service Centre list. In essence, Burley in Wharfedale and Menston are reinstated as Local Growth Centres (and thus removed as

Local Service Centres), with higher housing targets largely as a result of the revised Habitat Regulations Assessment.

Soundness of Main Modification MM88

2.25 Mr. Rothery **supports** the Councils inclusion of Burley in Wharfedale and Menston in the list of Local Growth Centres and the increase in housing distribution to said centres.

2.26 Mr. Rothery considers that the inclusion of Burley in Wharfedale and Menston in the Local Growth Centres is **sound** and it meets the four tests of soundness in that this Main Modification has been positively prepared, is justified, is effective and consistent with National Policy based on the adjustments to the settlement hierarchy derived from the amendments to the Habitat Regulations Assessment.

Main Modification MM92

Summary of Main Modification

2.27 This Main Modification seeks to adjust the approach to phasing of housing allocations as set out within Policy HO4. The modification goes on to identify that the housing implementation framework will set out how the Council will monitor delivery and this includes the implications of underachievement on housing completions and brownfield development targets for the phasing approach. The modifications go on to identify that the Council will consider the early release of Phase 2 sites in the unlikely event of a persistent shortfall (defined as being over two successive monitoring year periods) in five-year land supply. The text goes on to identify the Council's approach to maintaining a five-year land supply which includes allowing for a 20% buffer in additional supply brought forward from the latter part of the plan period and resolving the backlog in undersupply over the plan period which is termed as "the Liverpool" approach.

Soundness of Policy MM92

2.28 Mr. Rothery **objects** to the inclusion of a phasing policy within the Core Strategy as it is unjustified. At other Core Strategy examinations, for example, Rotherham, phasing policies have been removed.

2.29 If the phasing policy is to be retained, the appropriate approach for dealing with any undersupply within the five-year requirement calculation is to resolve shortfall within the five years (the Sedgefield approach) as advocated by the NPPF and the Planning Practice Guidance.

2.30 The inclusion of a phasing policy and one which is reliant on release of later phases based on the Liverpool approach to dealing with undersupply is **unsound** as the approach has not been justified, will be ineffective in terms of releasing later phases of land for housing and is also inconsistent with National Policy.

Proposed Changes to the Main Modification to address Soundness Issues

2.31 The phasing policy should be deleted from the Core Strategy. Should the phasing strategy be retained, the reference to the application of the Liverpool approach should be deleted and be replaced with the application of the Sedgefield approach, i.e. dealing with the backlog over a five year period, not the period of the plan.

Main Modification MM96

Summary of Main Modification

2.32 This Main Modification seeks to amend Policy HO6 by removing the reference to the delivery of 50% of housing on previously developed land as a minimum over the Local Plan period and also removes the reference to the PDL targets being a minimum for the Regional City of Bradford, Principal Towns, Local Growth Centres and Local Service Centres.

Soundness of Main Modification MM96

2.33 Mr. Rothery **supports** the Council's Main Modification at MM96 wherein it removes the reference to the PDL targets being a minimum.

2.34 Mr. Rothery considers the removal of the reference to the PDL targets being a minimum is **sound** and that it meets the four tests of soundness in that this Main Modification has been positively prepared, is justified, is effective and consistent with National Policy.

3.0 Conclusions

3.1 Mr. Rothery is supportive of the majority of the Main Modifications proposed and in particular, those which reinstate Burley in Wharfedale and Menston as Local Growth Centres and the respective increase in proposed housing delivery. Where issues on soundness with proposed modifications have been raised, amendments have been proposed to address any soundness issues.

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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	MR
First Name	[redacted]	
Last Name	ROTHERY	IRVING
Job Title (where relevant to this representation)		DIRECTOR
Organisation (where relevant to this representation)		ID PLANNING
Address Line 1	c/o AGENT	[redacted]
Line 2		
Line 3		LEEDS
Line 4		
Post Code		LS1 [redacted]
Telephone Number		[redacted]
Email Address		
Signature:	[redacted]	**Date:** 18TH JANUARY 2016

3. Please let us know if you wish to be notified of the following:				
The publication of the Inspector's Report?	Yes	✓	No	
The adoption of the Core Strategy?	Yes	✓	No	

Are you attaching any additional sheets / documents that relate to this representation?	Yes	✓	No	
	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 2

5. Do support or object the proposed main modification?

Support ✓ Object

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

Yes ✓ No

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

Yes ✓ No – 'unsound'

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

Positively prepared
Justified
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 the proposed main modifications).

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 7

5. Do support or object the proposed main modification?

Support	✓	Object	

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

Yes	✓	No	

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

Yes	✓	No – 'unsound'	

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

Positively prepared		Justified	
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.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 8

5. Do support or object the proposed main modification?

Support ✓ Object

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

Yes ✓ No

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

Yes ✓ No – 'unsound'

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

Positively prepared		Justified	
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.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 9

5. Do support or object the proposed main modification?

Support ✓ Object

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

Yes ✓ No

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

Yes ✓ No – 'unsound'

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

Positively prepared

Justified

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.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 11

5. Do support or object the proposed main modification?

Support	✓	Object	

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

Yes	✓	No	

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

Yes	✓	No – 'unsound'	

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

Positively prepared		Justified	
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.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 12

5. Do support or object the proposed main modification?

Support ✓ Object

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

Yes ✓ No

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

Yes ✓ No – 'unsound'

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

Positively prepared		Justified	
Effective		Consistent with National Planning Policy (the NPPF)	

9. Please give details of why you consider the proposed main modification is <u>not legally compliant or is unsound in light of the main modifications proposed</u>. Please be as precise as possible.

If you wish to <u>support</u> the proposed main modification please use this box to set out your comments.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 18

5. Do support or object the proposed main modification?

Support	✓	Object	

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

Yes	✓	No	

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

Yes	✓	No – 'unsound'	

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

Positively prepared		Justified	
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.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 51

5. Do support or object the proposed main modification?

Support	✓	Object	

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

Yes	✓	No	

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

Yes	✓	No – 'unsound'	

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

Positively prepared		Justified	
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.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 88

5. Do support or object the proposed main modification?

Support ✓ Object

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

Yes ✓ No

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

Yes ✓ No – 'unsound'

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

Positively prepared		Justified	
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.

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PART B – YOUR REPRESENTATION - *Please use a separate sheet for each representation.*

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 92

5. Do support or object the proposed main modification?

Support		Object	✓

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

Yes		No	✓

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

Yes		No – 'unsound'	✓

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

Positively prepared		Justified	
Effective	✓	Consistent with National Planning Policy (the NPPF)	✓

9. **Please give details of why you consider the proposed main modification is <u>not legally compliant or is unsound in light of the main modifications proposed</u>. Please be as precise as possible.**

If you wish to <u>support</u> the proposed main modification please use this box to set out your comments.

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4. To which proposed main modification does this representation relate?

Proposed Main Modification number: MM 96

5. Do support or object the proposed main modification?

Support	✓	Object	

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

Yes	✓	No	

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

Yes	✓	No – 'unsound'	

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

Positively prepared		Justified	
Effective		Consistent with National Planning Policy (the NPPF)	

9. Please give details of why you consider the proposed main modification is <u>not legally compliant or is unsound in light of the main modifications proposed</u>. Please be as precise as possible.

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SEE ATTACHED STATEMENT

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.

SEE ATTACHED STATEMENT

11. Signature: [redacted] Date: 18TH JANUARY 2016

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