

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 25th November 2015** until **Wednesday 20th 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 then 'Core Strategy Proposed Main Modifications', or you may request copies by:

- Emailing us at: 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
- **Post to:** Core Strategy - Proposed Main Modifications
Development Plans Group
City of Bradford Metropolitan District Council
2nd 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 20TH 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			
Last Name	Andrew		
Job Title (where relevant to this representation)	MP for Pudsey		
Organisation (where relevant to this representation)			
Address Line 1			
Line 2			
Line 3	Leeds		
Line 4			
Post Code	LS18		
Telephone Number			
Email Address			
Signature:		Date:	14/01/16

3. Please let us know if you wish to be notified of the following:

The publication of the Inspector's Report?	Yes	X	No	
The adoption of the Core Strategy?	Yes	X	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:

MM17 and MM18

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).

The aim of greenbelt policy, in line with the National Planning Policy Framework (NPPF), is to prevent urban sprawl by keeping land permanently open. My constituents have very real concerns that the Holme Wood Urban Extension in the Tong Valley will result in a blurring of the boundaries between Leeds and Bradford. As with previous green belt policy, inappropriate development, is by definition, harmful to the greenbelt and an alteration to a boundary should not be made unless in exceptional circumstances. I certainly understand the requirement for urban expansion, but the NPPF sets out that "unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the greenbelt". Further Government guidance also dictates that the NPPF should be read as a whole, and that housing need alone is not the only factor to be considered when drawing up a local plan. Additionally, the Bradford Growth Assessment

did not provide adequate independent evidence supporting a land release at Tong and the Neighbourhood Development Plan did not support the use of the Tong Valley for housing as there was overwhelming public opposition to the proposals. There is a great concern that the Council has allowed the selection of sites for development to lead the framework rather than looking into the permanence of developments. The Framework in the NPPF makes clear that constraints have to be considered and applied – the need to respect Landscape Character and Local Distinctiveness are part of these constraints. Finally, Government guidance is very clear that we should instead be seeking to build on brownfield land prior to the greenbelt. I would argue that there are many brownfield sites in Bradford which could be utilised rather than initially building across Tong Valley.

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.

There needs to be a more comprehensive greenbelt review, as there does not appear to have been full adherence to the NPPF rules in respect of greenbelt land. This could be followed by site allocations, in which neighbourhood planning groups could be involved. With the recent flooding in Yorkshire, new considerations need to be made when looking at developments on areas that are regularly waterlogged, which Tong Valley does.

There has been no adherence to the NPPF which specifically sets out that, “unmet housing need is unlikely to outweigh the hard to the greenbelt”. With that in mind, I do feel that the Tong Valley should not be used for property development.

11. Signature:

[Redacted Signature]

Date:

14/01/16

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