

## 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

### 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 a proposed main modification).

MM72 covers modifications clarifying and expanding on the methodology and process involved in identifying objectively assessed needs i.e. the District's overall housing requirement. Although the CSPD housing requirement figure (42,100) is not the subject of a Main Modification, it is impossible to comment on MM72 (and related modifications) without referring to this figure.

As stated in the preface to our comments, the housing requirement in the plan is considered to be deeply flawed, unjustified, significantly inflated and unrealistic, rendering the resulting development strategy and the plan as a whole as UNSOUND.

NPPF para 154 requires local planning authorities to prepare plans that are "aspirational and realistic" – the CSPD is certainly aspirational but absolutely not realistic.

Population/household growth is dependent to a considerable degree on economic conditions and the availability of future employment. The influence of projected economic and jobs growth on the number of new homes needed is identified as one of the key elements in the Housing Requirement Study (see new para 5.3.12, page 50 in Main Modifications document).

MM65 relating to Economy proposes a very significant reduction of 45% in the projected figure for jobs growth over the plan period (see separate representation).

However this reduction is not reflected in a revised overall housing requirement. This is totally unrealistic, and retaining the original figure of 42,100 households cannot be justified. As this requirement drives the entire development strategy with implications for green-belt release, sustainability of development, and other matters, the plan must be seen as UNSOUND.

An excellent document commissioned by CPRE (Set Up to Fail – Why Housing Targets

Based on Flawed Numbers Threaten our Countryside) clearly demonstrates the folly and dangers of drawing up development strategies and land allocations to meet an unrealistic housing requirement.

Large amounts of land are allocated, developers are able to cherry-pick the best (most profitable) sites, usually greenfield, whilst leaving others (often PDL) undeveloped, and have an interest in controlling (slowing) the rate of development, resulting in housing targets being missed. In response, Local Authorities allocate even more land, and the process repeats. The overall result is a serious and unnecessary loss of green-belt and other land of environmental/landscape value, perpetuation of dereliction, under-delivery of housing and other negative impacts.

Along with other groups, ACS considers this is exactly the position enshrined in the Bradford Core Strategy, which as a consequence risks serious damage to the environment and heritage of Wharfedale.

**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 District housing requirement must be reviewed to take account of the Council's own revisions to projected employment growth, to arrive at a figure that is realistic and that can be supported by the forecast number of jobs in the District.

At the same time, the reworking of the housing requirement must address the problems and deficiencies evident in the original methodology and assessment, as covered during consultation on the CSPD and at the public inquiry.

11. Signature:

Date:

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