

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:

MM8

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).

MM8 (and several other proposed modifications, including MM3, MM10, and MM52) remove references to development "to meet local needs" in Addingham (and other Local Service Centres). In the CSPD such references were clearly included as a conscious statement, and were seen as appropriate for the rural settlement of Addingham which (along with other Local Service Centres) the plan recognises as "the least sustainable locations for growth within the District and development should be focussed more on meeting local needs and supporting local services" (para 5.3.64).

However MM9 referring to Outcomes states that "Addingham.....will have seen a smaller scale of development to meet local needs" whilst MM90 refers to a "delivery pattern within smaller settlements and rural areas where sites are aimed at meeting local and affordable housing need...."

Scant justification is presented for removing references to local needs, whilst at the same time several references have been retained in the CSPD (unchanged by the proposed modifications).

In addition, and importantly, NPPF para 54 states that “ In rural areas.....local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing.....”

Removal of this requirement would therefore not be consistent with national planning policy.

Proposals for new housing development must be based on objectively assessed needs, and whilst it is accepted that local needs assessments cannot be required for all development locations and proposals throughout the District, it is considered that a focus on meeting local needs is entirely appropriate for rural settlements such as Addingham.

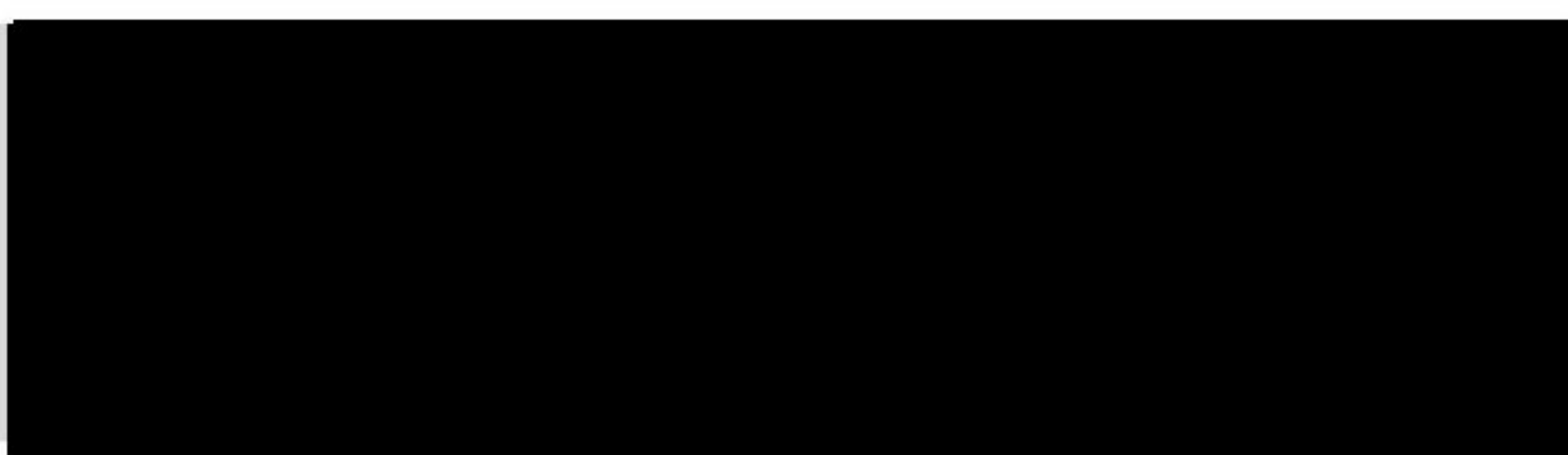
To add weight to this, Addingham has been approved as a Neighbourhood Plan area and there is therefore an opportunity for the community working in partnership with the Council and other stakeholders to address this issue directly.

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.

In order to comply with national policy, be consistent with other policy statements in the CSPD, and base proposals on objectively assessed needs, development proposals for Addingham (and other appropriate rural settlements) should be required to contribute to meeting identified local needs.

11.
Signature:



Date:

19th January 2016

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