

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:

MM96

5. Do support or object the proposed main modification?

Support

Object

X

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'

X

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

X

Consistent with National Planning Policy (the NPPF)

X

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).

MM96 relates to the priority to be given to developing previously developed land (PDL). The CSPD states at Policy HO6 "In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the plans, programmes and strategies of the Council will give priority to the development of previously developed land and buildings. This will mean achieving the maximum possible overall proportion of housing development on previously developed land consistent with....."(4 requirements) These statements are not altered by proposed modifications.

The stated priority for PDL complies with NPPF requirements for PDL and sustainability, and is supported and welcomed.

MM96 goes on to refer to a figure of 50% of the housing requirement to be on PDL District-wide, and 35%

in Local Service Centres such as Addingham. However, the modification removes previous references to “a minimum of” and “at least” in regard to PDL, stating that it is better to refer to targets whereas the original wording implied a likelihood of achieving above the specified levels which may not prove possible. This change is totally incompatible and inconsistent with the Council’s own statement (see above) of “....achieving the maximum possible overall proportion.....on previously developed land”

This represents a weaker approach, and it will be too easy for targets to be missed, manipulated and excused. Development management/land release/phasing will have to be very carefully controlled if this approach is to be successful – it could be entirely possible for the 35% PDL figure to be achieved in one or two Local Service Centres with relatively large amounts of PDL, leaving any PDL in other centres undeveloped along with open/green sites in such centres at the mercy of developers. The current approach in the CSPD is not considered sufficiently robust.

As an example, Addingham does have areas of PDL and it is essential that the plan gives real priority to ensuring that this is brought forward for development and not circumnavigated by weak policies allowing unnecessary development on green/open land and leaving PDL to continuing dereliction.

The original wording in the CSPD relating to “a minimum of” and “at least” should be retained if the plan is to be effectively delivered within its own objectives for giving real priority to PDL, and the Core Strategy top-level document should contain more robust policies for managing the process and giving guidance to subsequent stages ie Allocations DPD.

MM96 is closely linked to other modifications regarding the phasing of development, particularly MM89, 90 and 92. The phasing approach is welcomed, as is the statement at MM90 that there will be a “need to ensure an even delivery pattern within smaller settlements and rural areas where sites are aimed at meeting local and affordable housing need over the whole period of the Local Plan” – this would clearly apply to the settlement of Addingham.

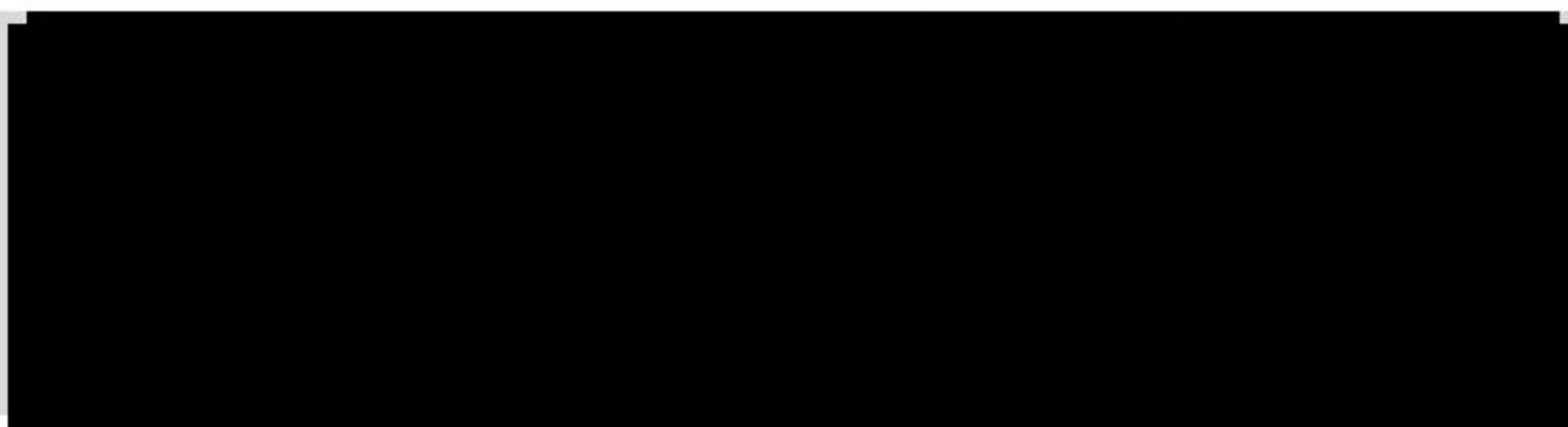
10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.

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 original wording in the CSPD should be retained and more robust and effective policies included in the higher-level document to guide future work on site allocations and phasing.

The plan should contain policies to ensure that where Local Service Centres do have areas of viable and deliverable PDL, such sites are brought forward for development before other sites, in the context of achieving the required housing allocation for the settlement and an even pattern of development over the plan period.

11.
Signature:



Date:

19th January 2016

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