City of Bradford Metropolitan District Council

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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.

4. To which proposed ma		his representation relate?			
Proposed Main Modification number:		MM18			
5. Do support or object t	he proposed main mod	lification?			
Support		Object	√		
6. Do you consider the p	roposed main modifica	tion 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 prepar	ed √	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 <u>support</u> 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).					
- The plan is not positively prepared as it is not consistent with "achieving sustainable					
development". The definition of Sustainable development by the National Planning Policy					
Framework includes "contributing to protecting and enhancing our natural, built and historic environment" (p.2). Building thousands of houses across Green Belt land, so close to the					
heritage site of Fulneck would not be achieving sustainable development.					
- This plan to build so many houses in Tong valley is not justified when set against reasonable alternatives. There are several other areas in Bradford which are not Green Belt, which have already had houses identified at higher levels and in the most recent modifications had their					

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number of houses reduced. Clearly planning permission is already anticipated in these areas.

Therefore it makes them more appropriate to put back up their allocation of houses as they are not being built on Green Belt.

- It is also not justified when you consider what a flood risk the area proposed to be built on is. Any new housing at Westgate Hill and in the Tong Valley would increase the flooding in Troydale and other Pudsey Beck related areas. Everything runs into the beck at the moment that in the recent flooding was completely overrun. Building such a large number of houses in this area would have a detrimental effect on the beck and result in flooding in the area and further down stream.
- It is not consistent with the NPPF as it has not been shown that there are enough exceptional circumstances to justify the change to the Green Belt area. Just because there are some 'land supply constraints' in non green belt land does not justify the need to demolish such a large area of Greenbelt. Building 11,000 houses would clearly not just prejudice but destroy the Tong Valley's strategic function. It would damage and change the area forever
- 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.

I would like the modification to say:

Due to the lack of exceptional circumstances more effort will be put into finding non green belt land to build on as building on this green belt land would prejudice the strategic function of the land. We affirm that no building in the Tong Valley will take place between now and 2030 and are glad to pass on this treasure to the next generation.

11. Signature: Date: 19/1/16

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