

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	[REDACTED]		
Last Name	Wilkinson		
Job Title (where relevant to this representation)			
Organisation (where relevant to this representation)	Addingham Planning Gcrutiny Group		
Address Line 1	[REDACTED]		
Line 2	Addingham		
Line 3			
Line 4			
Post Code	LS29 [REDACTED]		
Telephone Number	[REDACTED]		
Email Address	[REDACTED]		
Signature:	[REDACTED]	Date:	19.01.2106

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

The publication of the Inspector's Report?	Yes		No	
The adoption of the Core Strategy?	Yes		No	
Are you attaching any additional sheets / documents that relate to this	Yes		No	

representation?	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

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'

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)

Not consistent

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).

Preamble We believe that Bradford's Plan is fundamentally unsound.

Reports submitted by consultants acting on behalf of the Council have contained serious errors in data handling and data interpretation which have served to inflate housing numbers and the inconsistencies running through both the initial Plan and the Main Modifications are a direct consequence.

The figure of 41,600 homes by 2030 is not supported by population projections, household formation projections or job creation projections. A target of 30,000 is indicated by that data. We believe that to put in place a plan that sets a target in excess of the objectively assessed need for this District runs counter to the interests of its population

1. We refer to work by CPRE National Office on the way that unrealistic housing numbers are driving us into damaging and un-implementable plans:

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/download/4307>"

The document is a virtual "roadmap" of the Bradford Plan and Main Modifications processes.

The Plan and the modifications fail to use evidence to protect the countryside in the area and fail use existing planning guidance to explain why high housing targets are not sustainable.

The plan and modifications fail to address the risks to the District identified in the Report. For this reason alone, the Plan and Modifications have to be set-aside as unsound.

2. The 'selective vs comprehensive' Green Belt review conundrum.

Is the Leeds City Region Green Belt the best shape and size for its strategic function? How do we know? Unless it is fully analysed across the City Region the Plan and modifications fail to display whether taking out sites in selected locations would undermine that strategic function?

3. Furthermore, 11,000 homes and some employment land in the Green Belt is very likely to increase dispersal of the settlement pattern, at least unless the brownfield targets are also achieved. A really crucial issue is how the monitoring of housing delivery is used to ensure the settlement hierarchy is applied in practice. That means, in theory about 65% of all new housing should be in inner-urban sub-areas, compared to 5% in Wharfedale and 16% in Airedale, but if it's predominantly Airedale and Wharfedale where planning permissions are granted, this could rapidly skew the picture compared to what the strategy intends. This issue has to be addressed before the Plan and Modifications can be considered sound

See ANNEX B

FAILURE TO COMPLY WITH NPPF POLICY ON GREEN BELT

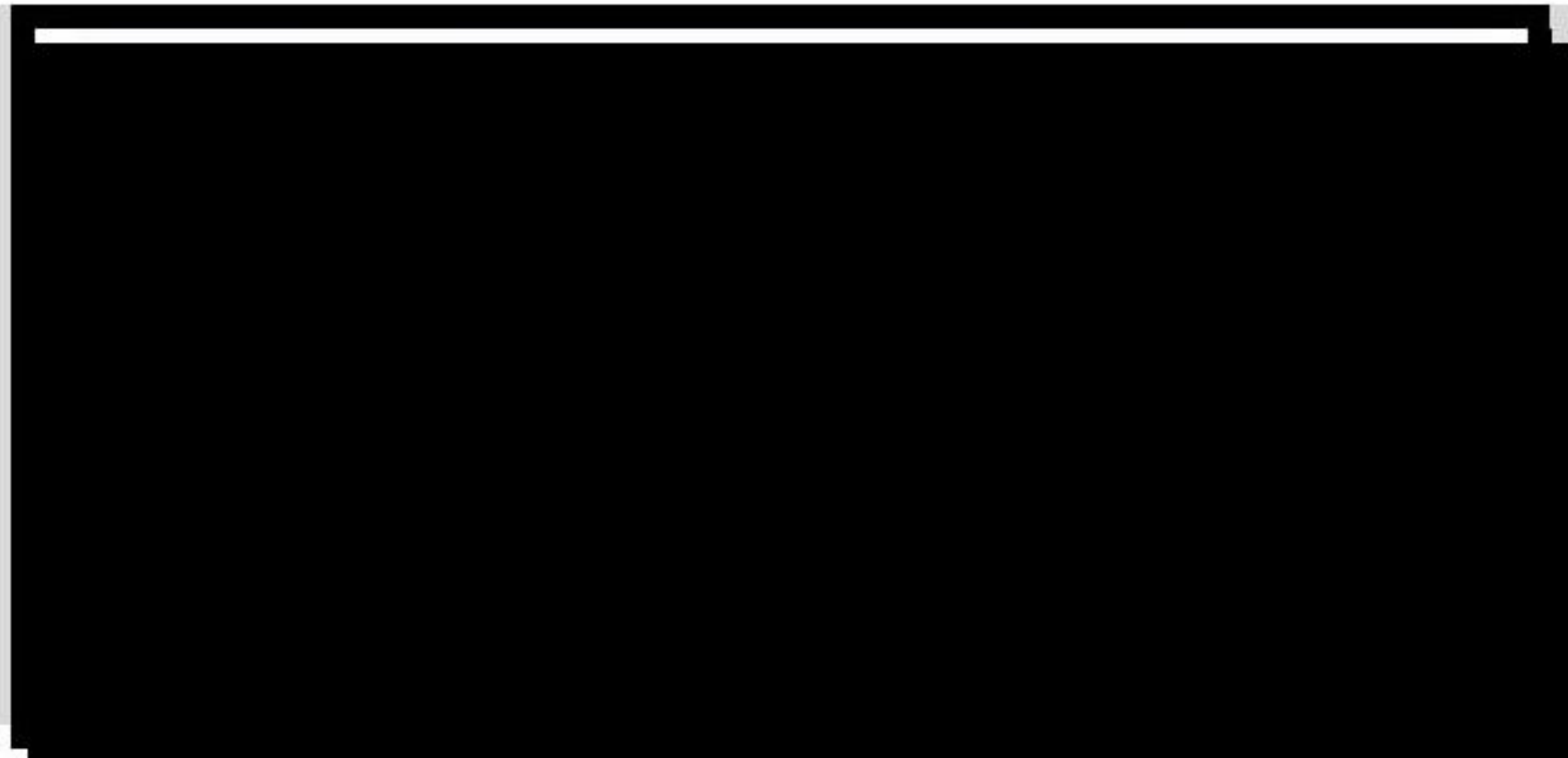
– Green Belt selective review was rejected by the Leeds Inspector; clarity on "exceptional circumstance" – para 82 of the NPPF; low landscape value green space/Green belt should be developed before high landscape value land. The modifications conflict with (unless made subservient to) MM54 (p.38).

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 is no longer a case to be made for exceptional circumstances. The original housing figures were based on the assumption that Bradford would create 4,200 jobs per annum, that these jobs would cause inward migration because people would seek work here/remain here because they had a job and that this would increase population growth beyond that projected by the ONS and DCLG.

11.
Signature:



Date:

19.01.2016

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