

## 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 25<sup>th</sup> November 2015 until Wednesday 20<sup>th</sup> 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](http://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](mailto: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](mailto:planning.policy@bradford.gov.uk)
- **Post to:** Core Strategy - Proposed Main Modifications  
Development Plans Group  
City of Bradford Metropolitan District Council  
2<sup>nd</sup> 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 20<sup>TH</sup> 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 scrutiny 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:

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

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

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:

MM55

### 5. Do support or object the proposed main modification?

Support

Object

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)

no

### 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.

With reservations We endorse the Modifications in MM55. The reservations are:

1. "Amend paragraph 4.3.4, as follows:

The village of Addingham, on the edge of the Yorkshire Dales National Park, has retained its character and sense of place whilst seeing a smaller scale of housing development and provision of meeting local needs for affordable housing and local facilities. The village has also benefited from good bus connections to the principal town of Ilkley, the town of Silsden and neighbouring Skipton".

The statements regarding "good bus connections" cannot be supported-Recent timetable changes have limited connections, and have made travel to Skipton for work impossible on Sundays and at significant times on weekdays.

This is an important loss to young people travelling to College and workers employed on unsocial hours contracts. This also has significant effects on the large proportion of people working in the tourist industry, and hence on sustainable employment opportunities.

2.The changes in MM8 remove the reference to Local Needs. The reasons given for removing the words are complex. However this wording reinforced sustainability considerations, including that excessive development within Addingham will be unsustainable on the basis that it will necessitate travel to work, mostly outside the Ward.

3. MM18 introduces the wording "Key Market locations where (green belt) land could be made available in order to ensure a suitable offer of deliverable large sites in good market locations.....". Planning for large sites in Addingham threatens the "character and senses of place of the settlement" which the plan values. The modification infers the unsustainable development as in 2 above.

4. Wording directing "smaller scale developments" has been lost and should be retained.

**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.**

Housing Allocations should reflect needs reflecting employment patterns

Suitable wording needs to be found to avoid increasing unsustainable commuting , compounding the travel problems currently evident.

Wording is needed to constrain development to levels which will avoid increased commuting outside the settlement

**11. Signature:**



**Date:**

19.01,2016

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