

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:

Date 20/01/2016
Ref 102

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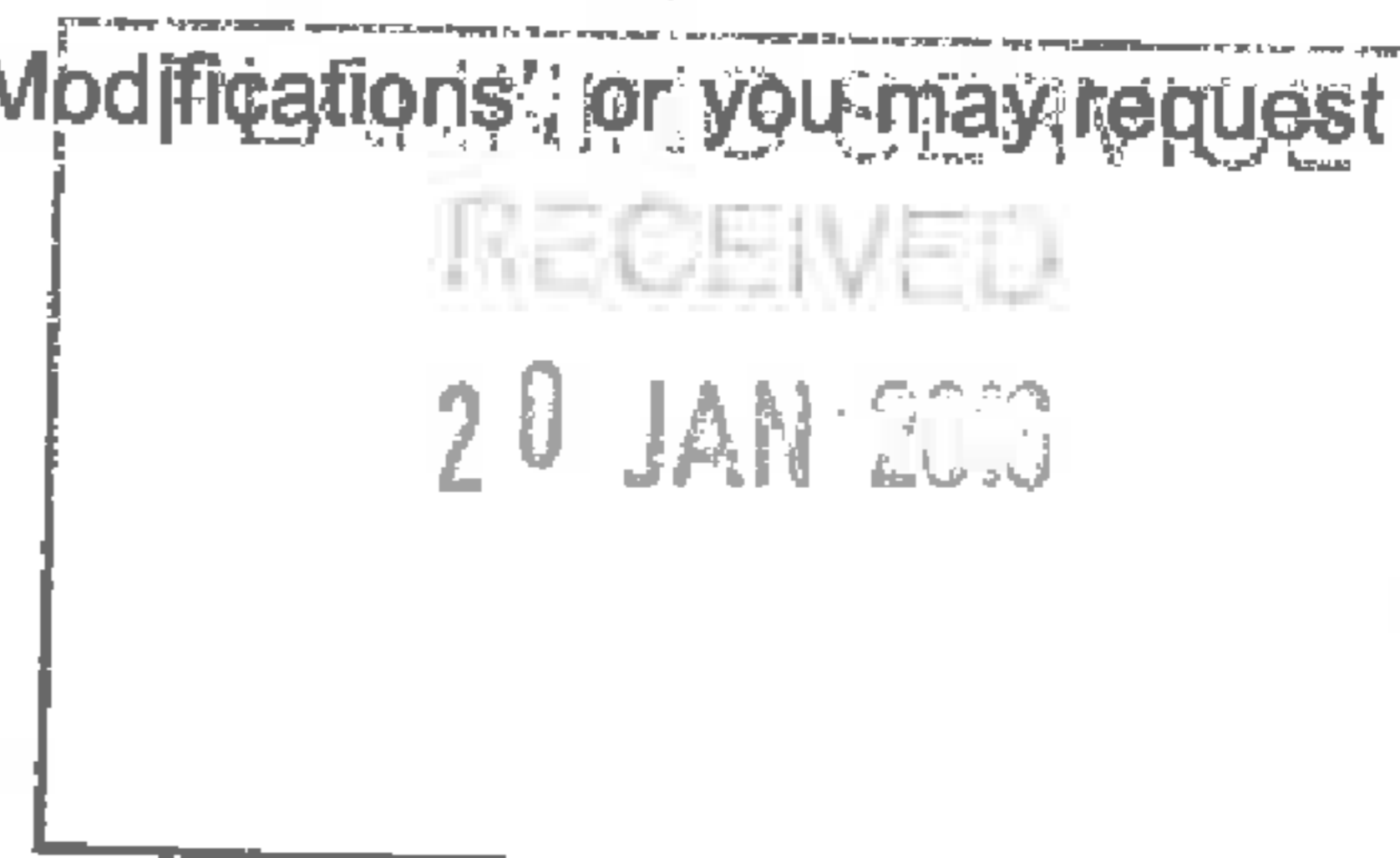
The Council are seeking comments on the Proposed Main Modifications to the Core Strategy, following the Examination in Public in March 2015. The changes are proposed by the Council to address issues of legal compliance and soundness and we can only accept representations on these matters.

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	Pickles		
Job Title (where relevant to this representation)			
Organisation (where relevant to this representation)			
Address Line 1	[REDACTED]		
Line 2	Silsden		
Line 3	Keighley		
Line 4			
Post Code	BD20 [REDACTED]		
Telephone Number	[REDACTED]		
Email Address			
Signature:	[REDACTED]	Date:	20/01/16

3. Please let us know if you wish to be notified of the following:			
The publication of the Inspector's Report?	Yes	yes	No
The adoption of the Core Strategy?	Yes	yes	No
Are you attaching any additional sheets / documents that relate to this representation?	Yes	yes	No
	No of sheets / documents submitted :		2

18 sheets
11/20/16

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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:

MM7 PAGE 42 (and refer MM11 PAGE 47)

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

Support

Object

OBJECT

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

YES

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

NO

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 the proposed main modifications).

SECTION 3 SPATIAL, VISION, OBJECTIVES AND CORE POLICIES.

POLICY SC4 HIERARCHY OF SETTLEMENTS

MM7 PAGE 42 AND RELATED WORDING ON MM11 PAGE 47

PLEASE SEE ATTACHED 2 PAGES OF COMMENTS.

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.

PLEASE ATTACHED 2 SHEETS

11. Signature:



Date: 20/01/16

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

Section 3 SPATIAL, VISION, OBJECTIVES AND CORE POLICIES

Policy SC4, Hierarchy of Settlements

MM7 Page 42 and MM11 Page 47

Proposed change does not satisfy the three dimensions of Sustainable development, Economic, Social and Environmental.

The objection is to the mis-representation of using the words “most sustainable centres”

Reasoning; Silsden cannot be a most sustainable centre in order to deliver anything more than 100 dwellings considerable infrastructure investment needs to be delivered first in comparison to other areas of the district where improvements have been made situated closer to Central Bradford.

An economic role includes the provision of infrastructure, with regards Silsden it is well documented that the present infrastructure provision needs extensive improvements regarding the key areas of;

Electricity supply requires upgrading

Drainage both sewage and top water is antiquated and operating at capacity {highlighted in the recent December floods}

Transport, Silsden needs a relief road and extensive repairs to the existing road network {note no major investment has been made within the last 40 years, and also ties in with the drainage issues}

Access to the rail station at Steeton is not pleasant with no continuous footpath and having to cross the busy A629. Bus services are every 30 minutes but not co-ordinated with the rail service, putting a heavy reliance on use of private motor cars.

Education the primary schools are at capacity, any new residents would likely have to commute in addition to those locals who have found no place available in reception year. This causes social problems.

Environmental, Silsden is a considerable distance from central Bradford the need to commute is a necessity increasing pollution on both the Aire and Wharfe valleys and at peak times considerable time delays are experienced. Sites closer to Bradford are more sustainable as we move to a low carbon economy.

It is estimated infrastructure needs will amount to circa £35m million, {Existing drainage, road repairs, Relief road, Bridge, Schools, Power upgrade} the additional provision of new dwellings could be provided elsewhere in the district at lower cost.

In summary the lack of suitable and sufficient infrastructure being in place significantly and demonstrably outweighs the benefits of allocating development to Silsden of an additional 200 dwellings.

Suggested amendment to MM7 wording as follows;

A. Burley in Wharfedale, Queensbury and Thornton are sustainable local centres accessible to the regional city of Bradford and Menston in Wharfedale, Steeton with Eastburn and Silsden in Airedale are local centres. Burley in Wharfedale, Menston, Steeton have their own rail stations Queensbury, Thornton and Silsden rely on bus services for public transport. All could make a significant contribution to meeting the district needs providing sufficient employment, infrastructure improvements, are put in place to support new homes and justify significant input to supporting community facilities.

MM11

Delete the words *are the most sustainable local centres and* reject main modification change

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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:

MM44 PAGE 82 (and refer MM38 PAGE 72 is linked re number change)

5. Do support or object the proposed main modification?

Support

Object

PLANNING SERVICE
RECEIVED
20 JAN 2016

OBJECT

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

NO

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

NO

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)

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SECTION 4.2 SUB AREA POLICIES; AIREDALE

SUB AREA POLICY AD1

MM44 Page82 (and MM38 Page 72 is linked re number change)

Please see attached 1 page of comments

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.

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PLEASE ATTACHED SHEET

11. Signature:



Date: 20/01/16

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

Section 4.2 Sub Area Policies: Airedale

Sub area policy AD1

MM44 Page82 {and MM38 Page 72 is linked re number change}

Proposed change does not satisfy the three dimensions of Sustainable development, Economic, Social and Environmental.

The objection is to the increase in numbers of residential units by 100 from 8350 to 8450 by 100 and move the reduction of 100 units from Baildon to Silsden and add an additional 100 to Silsden.

Reasoning, Silsden needs extensive infrastructure investment in particular to the drainage system, highlighted by recent floods, no investment over last 40 years, in comparison other areas have been improved during the period.

Since the document was published other sites have become available in the district particularly brown field with services already in place, within the Bradford District which would likely increase in the near future due to lack of demand for office space.

Studies regarding capacity in Silsden indicate capacity issues backed by the SHLAA 3 that unless a relief road is provided and drainage improvements the sites allocated will struggle to be delivered in the first phase.

Object to the amendment change in numbers, in addition on page82 the last paragraph after infrastructure suggest insert the words "*utilities, improved education facilities must*" and delete the word will.

To provide a strategic pattern of development to suddenly add an additional large percentage of units to Silsden is questionable. The lack of suitable and sufficient infrastructure being in place significantly and demonstrably outweighs the benefits of allocating development to Silsden of an additional 200 dwellings.

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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:

MM88 PAGE 172

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

YES

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

NO

8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

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Justified

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Effective

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Consistent with National Planning Policy (the NPPF)

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(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).

SECTION 5.3 PLANNING FOR PEOPLE –HOUSING

MM 88 PAGE 172

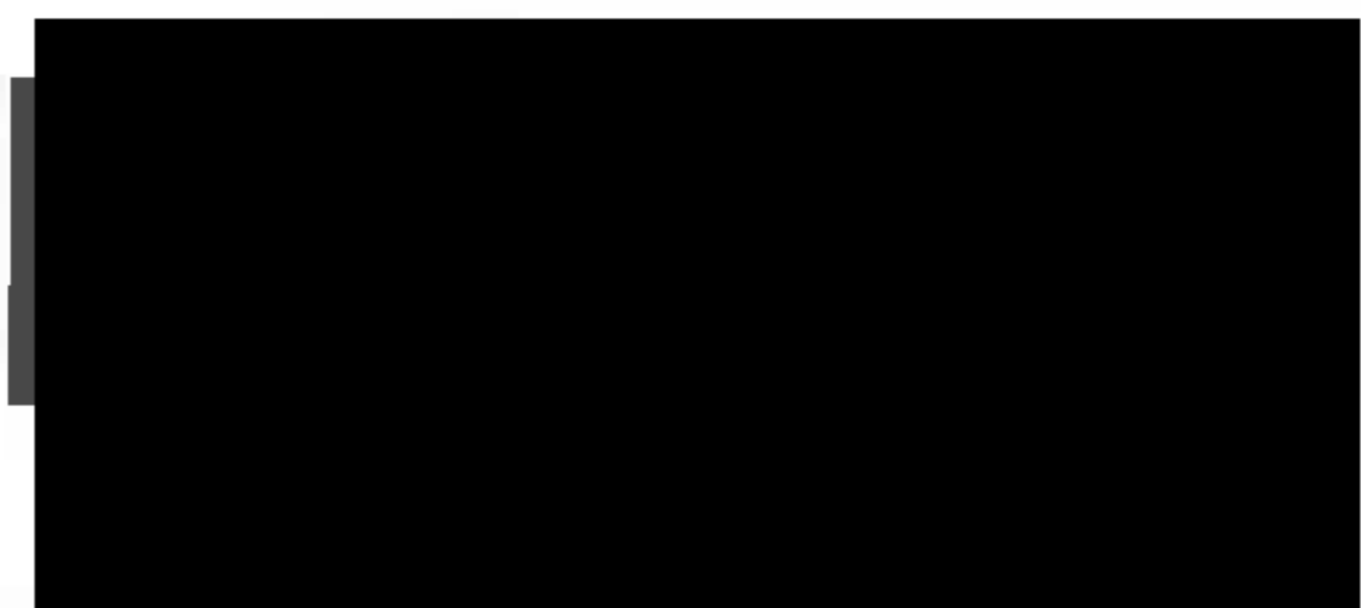
PLEASE SEE ATTACHED PAGE OF COMMENTS

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.

RE-DISTRIBUTION OF PROPOSED NUMBERS OF RESIDENTIAL UNITS BACK TO THE CENTRES CLOSER TO BRADFORD AS PREVIOUSLY PROPOSED BEFORE THE AMENDMENT.
Refer TO THE ATTACHED PAGE OF COMMENTS.

11. Signature:



Date:

29/1/16

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

Section 5.3 Planning for people - Housing

MM 88 Page 172

Proposed change does not satisfy the three dimensions of Sustainable development, Economic, Social and Environmental.

The objection is to the increase in numbers of residential units from 1000 to 1200.

Reasoning; Burley in Wharfedale and Menston are re instated as Growth Centres hence the balance of distribution to local growth centres does not justify support for an additional 200 to Silsden.

The other growth centres are closer to Bradford for commuting, although they also suffer from transport problems, settlement increases further away will only add to this problem on a daily basis commuting to reach intended destinations for work.

Taking into account the population proportionate target for Silsden MM75 was 633, the new figure will be almost double and heavily reliant on inward migration.

Current infrastructure will not support the expansion indicated in the first phase of the SHLAA.

Silsden is the only growth centre identified with a limited electricity power supply capacity problem. Power cuts have been experienced recently and taking into account current builds and those approved in the greater area the Silsden sub station serves, indicate this problem is unlikely to be resolved in the short term. {Funding issues with the Power supplier are highlighted in council documents elsewhere}

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(4)

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.
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4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM96 PAGE 178 C.

5. Do support or object the proposed main modification?

Support

Object

PLANNING SERVICE
 RECEIVED
 20 JAN 2016

OBJECT

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

 YES

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

 NO

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)

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SECTION 5.3 PLANNING FOR PEOPLE – HOUSING
MM 96 PAGE 178 C.
PLEASE SEE ATTACHED PAGE OF COMMENTS

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.

RE-DISTRIBUTION OF PERCENTAGE OF UNITS ON PREVIOUSLY DEVELOPED LAND SHOULD BE ADJUSTED TAKING INTO ACCOUNT THE PHYSICAL POSSIBILITY OF PROVIDING SUCH. SUGGEST THE % IS SET AT 25% FOR BOTH SERVICE CENTRES AND GROWTH CENTRES (SUBJECT TO PHYSICAL CHECKING THE PRACTICALITY OF APPLYING AT THE SETTLEMENTS CONCERNED).

(e.g. a service centre with only 200 dwellings advocated over the plan period is unlikely to contain enough brownfield land to provide 70 dwellings)

REFER ATTACHED SHEET

11. Signature

Date:

20/1/16

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

Section 5.3 Planning for people - Housing

MM 96 Page 178 C.

Proposed change does not satisfy the dimension of Sustainable development across the district.

The objection is to the percentage proportions and removal of the word *minimum* for housing on previously developed land.

Reasoning; There is more scope for developing on previously developed land taking into account the whole district and in particular the local growth centres which have previously suffered from a decline in traditional businesses {textiles, manufacturing} in the area. In comparison to the local service centres reviewing the local maps and SHLAA 3, it is highly unlikely a proportion of 35% of previously developed land is attainable in the service centres.

Suggest retain the word minimum and amend the % to 25% for both types of centre, subject to re-checking viability and possibility of sites within each growth and service centre.

Reasoning; Examination of the SHLAA 3, Availability of utility services, Improvement of present landscapes and vistas, achieving sufficient numbers of a range of types of dwellings across the district in the first phase.

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(5)

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4. To which proposed main modification does this representation relate?

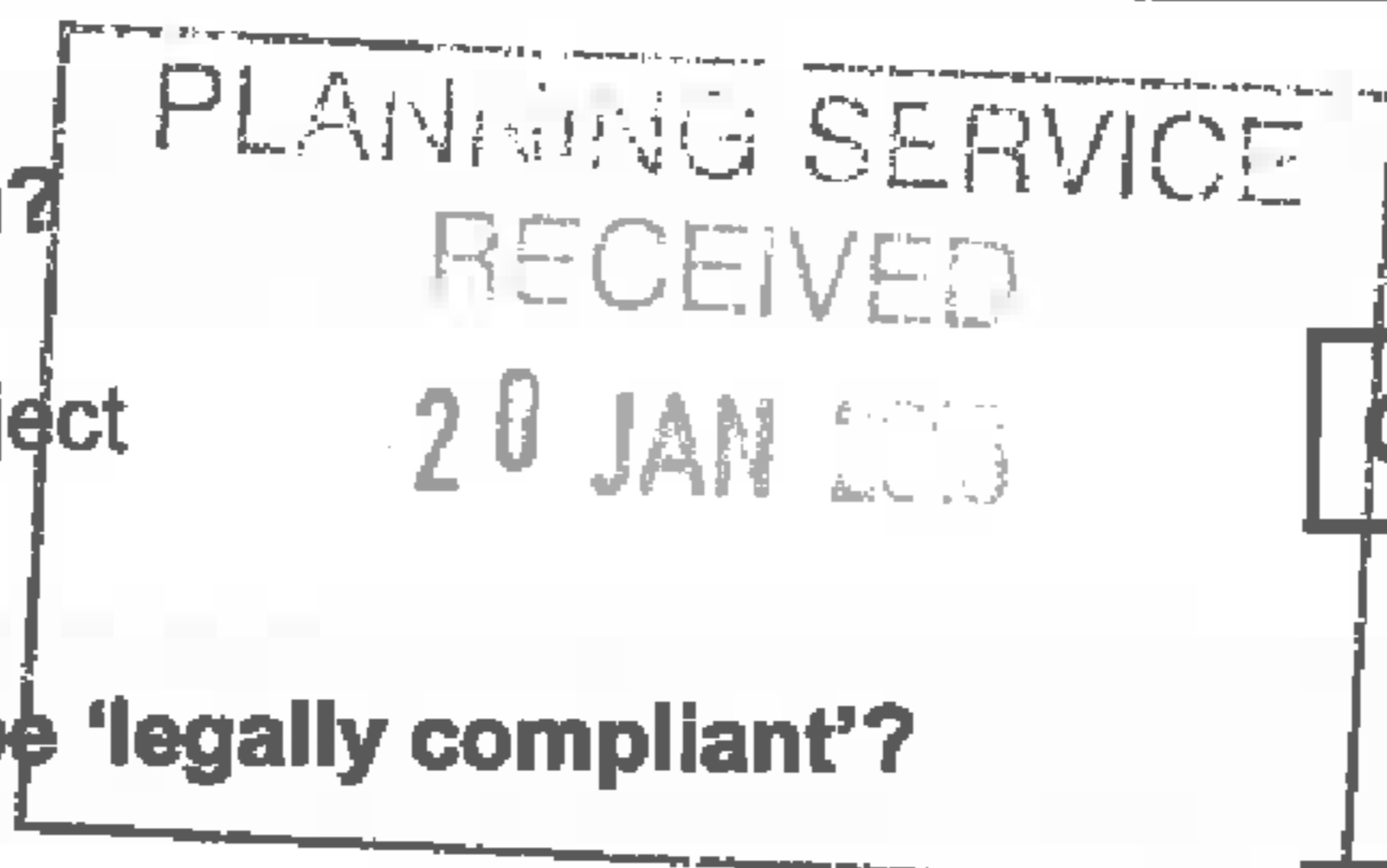
Proposed Main Modification number:

MM100 PAGE 189 C.

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

NO

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

NO

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)

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SECTION 5.3 PLANNING FOR PEOPLE – HOUSING

MM 100 PAGE 189 C.

Satisfy the Social and Sustainability criteria

Proposed change should be clear to understand the Core Strategy will be used as a reference document for future housing developments.

Reasoning; All sites should include a proportion of new homes which are designed to be accessible and easily adaptable to support the changing needs of all people both families and individuals over their lifetime including older people and people with impaired mobility to

address;

- A nationally recognised under supply of adaptable homes
- Promote positive integration
- Avoid unfairness if only applied to larger sites
- Not only relates to occupiers, but allowing persons of impaired mobility to access relatives etc on new build sites
- Equality Act compliance

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.

Suggest change the word Larger to All sites (of more than 10 units) OR leave wording as previously shown before the amendment with the addition of the words *older people*

11. Signature:



Date:

20/1/16

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