

## 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:

MM92

#### 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'

#### 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 a proposed main modification).

Keyland Developments continues to object to the proposed phasing policy on the basis that this is unsound, inconsistent with national planning policy and Inspectors' advice on other Local Plans. We refer to our previous written and oral representations on this matter.

The NPPF in paragraph 47 is clear that the local planning authority's role is to 'boost significantly' the supply of housing. Inclusion of a phasing policy within the Core Strategy which seemingly restricts housing delivery in the first years of the plan would hamper the Council's ability to address paragraph 47 of the NPPF. Consequently it is our Client's view the approach in Policy HO4 is inconsistent with the NPPF and on this basis is unsound.



This view was shared by the Inspector examining the Rotherham Core Strategy who required Rotherham MBC to remove its proposed phasing policy on the basis that such policies do not accord with the NPPF. Paragraphs 49 and 50 of the Inspector's report stated:

“The approach of the Framework is to promote sustainable development which should go ahead without delay. Sites should be tested to ascertain whether they are sufficiently sustainable and deliverable to justify their development rather than phased according to their degree of sustainability. A phasing policy holding back greenfield sites until all or some previously-developed land is suitably re-used would have a beguiling attraction, but the status of any site as previously-developed land should be seen as just one consideration, albeit in some cases an especially important one. The Sites and Policies DPD should therefore identify sites which are sustainable in the round in accordance with the strategy set out in the Core Strategy. The Council should then encourage their suitable and speedy development, thereby eliminating an aspect of uncertainty. Where there is less than a 5 year supply of housing land, as in the Borough, this approach assumes even greater importance.”

Clearly, these considerations are also relevant to Bradford on the basis that the Council also does not have a 5 year housing land supply.

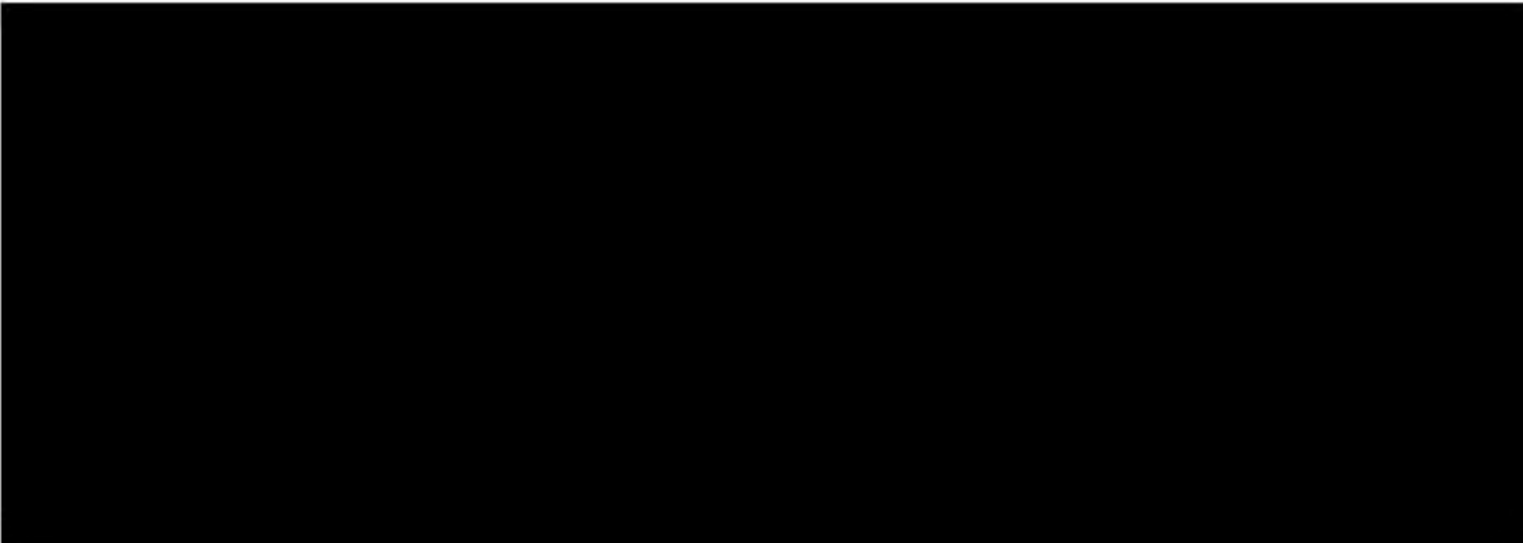
**10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.**

**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 phasing policy should be deleted.



11.  
Signature:



Date:

20/01/2016

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