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Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.

Publication Draft - Representation Form

PART A: PERSONAL DETAILS

* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Mrs	
First Name	████████	
Last Name	Batterley	
Job Title <small>(where relevant)</small>	Parish Clerk	
Organisation <small>(where relevant)</small>	Wilsden Parish Council	
Address Line 1	████████████████	
Line 2	████████████████	
Line 3	Wilsden	
Line 4		
Post Code	BD15 ██████	
Telephone Number	████████████████	
Email Address	██	
Signature:	<input type="text"/>	Date: 22/03/14

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 B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	<input type="text"/>	Paragraph	<input type="text"/>	Policy	SC4, SC5, SC7, HO6, HO7, HO8, HO11
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4 (2). Sound	Yes	<input type="text"/>	No	X
4 (3). Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible.

If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Local Plan is unsound in relation to the South Pennine Villages that are Service Centres, specifically Wilsden.

Wilsden is a village that has been designated a Local Service Centre and lies within the South Pennine Towns and Villages close to the western edge of the former Bradford City boundaries. Despite having experienced considerable growth, 15% increase in dwellings over the last 10 years, it has largely retained its village character and separate identity. Because the developments over the last 10 years have been on previously developed land and infill sites the village has experienced significant infrastructure pressure but has not threatened the current settlement boundaries. The Core Strategy proposes a further 200 dwellings which it says will only be achieved by significant Green Belt deletions and extension of the current settlement boundaries.

Wilsden Parish Council considers BMDC's Core Strategy, although laudable in its aims, has not got enough detail to be deliverable and is unsound. We outline below the detail of the Parish Council's concerns and highlight what we believe are internal contradictions in the current document.

Policy SC4 proposes that in Wilsden "the emphasis will be on smaller scale developments which meet local needs together with the protection and enhancement of those [Local Service] centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions". There is also a proposal that 'a much slower pace and scale of growth compared to urban areas forms the overall approach in these [Local Service Centres and rural areas] parts of the district, with development being focussed on meeting local needs...' (3.75) and 'The Plan seeks to prevent the unnecessary dispersal of development to smaller settlements' (3.76) as well as [aiming to] 'minimise the amount of dispersal of development to edge of settlement locations and the need for changes to Green Belt' (3.79).

It is the view of Wilsden Parish Council that the 15% increase in housing in Wilsden over the last ten years has been significantly higher than growth across the rest of the district and that further growth of 200 houses in the next plan period is unsustainable in terms of infrastructure or achieving the aims of SC5 or, indeed, of SC7 which states that 'The Bradford District has a long established Green Belt which performs a number of Green

Belt functions (3.101) not least of which is SC7 A) 'Keeping settlements separate and conserving countryside'. We contend that there should be no deletions of Green Belt or extending of the settlement area in Wilsden or towards Wilsden from the settlement areas around it, and that growth in the LSCs in the South Pennine Village area should also be contained within the settlement areas.

This accords with the Landscape Character Design Guide for Wilsden (2008) which states "The Wilsden area is already perceived as a busy and quite crowded landscape with most lanes having a heavy traffic flow. It does not have the capacity to accommodate vast amounts of new development, mainly due to the associated infrastructure, e.g. roads, lighting, kerbs and signs that further development would bring to the landscape – causing significant damage to the Wilsden character" (p14).

Specifically the Parish Council has concerns in the following areas and for the following reasons:

- There is contradiction in allocating housing to the South Pennine Villages which are the lowest hierarchy and (5.3.56) remote from the areas of greatest need and hence least suitable.
- There is further contradiction that in order to build houses in these 'least sustainable locations for growth', Green Belt deletion would be required in villages such as Wilsden where there is little or no PDL.

In January 2013, the Parliamentary Under-Secretary of State for Communities & Local Government said "It is important for every Local Authority area to come up with a plan that meets its fair share of housing need. However, the NPPF is very clear about the protection of Green Belt. That is of the utmost importance; its permanence and openness is vital, and the NPPF is absolutely explicit about the importance of preserving that." For this reason the Core Strategy is not consistent with national policy.

Policy HO7 has the aims of 'maximising the use of PDL and prioritising their development in phasing policies' and 'minimising the use of Green Belt land within the plan area' but the Core strategy is weak in how this will be achieved and we consider that these aims are undeliverable. Basically PDL sites are lower in deliverability and developability because the developers prefer not to use them. The Plan does not give any idea of how PDL might be made more enticing to the developers. The adverse consequences of failing to properly phase sites will lead to development of green field sites taking precedence over re-use of brown field.

Policy HO6 states that 'the Council will monitor performance against the targets [for use of PDL] and will take action if performance slips outside of the ranges. What action will be taken?

Policy HO8 requires a strategic emphasis on delivering housing of the type required, in the areas it is required. The Core Strategy does not demonstrate how this will be achieved nor what measures would be taken if monitoring shows that it is not being achieved. Again we believe this to be undeliverable.

HO8 also requires a target of 20-25% of total completions to be affordable housing. There is no evidence to confirm that this number of completions would meet HO8 D 2 'Delivering sufficient affordable housing and meeting the needs of low income and first time buyers'. Additionally the Core Strategy cites only up to 15% affordable housing in inner Bradford and Keighley, up to 20% in towns suburbs and villages and while Wharfedale is cited as up to 30%, the total housing allocation for Wharfedale is not a big enough proportion of the whole to bring the plan area's figure to anywhere near the 20-25% target. Compounding this, Bradford historically has had lower (15%) of social housing than other areas locally or nationally and the shortfall has not been adequately met (either in number or quality) by private housing. What proof can be put forward that the aim of Policy HO11 to 'ensure that there is a sufficient supply of good quality affordable housing throughout the district' can be met?

The Bradford SHMA sub areas do not correspond to the Core Strategy sub areas making like for like assessments of housing need in the areas impossible.

The Core Strategy aims to 'deliver a wide choice of high quality housing'. The only evidence given for this is identification of five plus years of specific developable sites and buffer. It does not follow that developers will build a wide choice of quality housing on these sites, nor does it follow that the provision of more sites will deliver more housing if the developers do not want to build on them. The likely result of this is 'cherry-picking' of the most profitable sites and shunning of the more problematic ones leading to 'planning blight'. Once again, the laudable aim of the Core Strategy is undeliverable.

Key factors and evidence for distribution of housing across the Plan area were: Land supply - capacity within each development, and Growth study - which parts of the district would be most capable of growth. There is no evidence put forward that growth is being planned for the areas where the need for housing is greatest. The Core Strategy states 'where there is a [infrastructure] capacity problem, developers will be expected to fund or to contribute towards the necessary improvements or new provision to serve needs arising from their development'. Since CIL is applied retrospectively there is a need for the Council to finance infrastructure improvements and recoup the money when it becomes payable, otherwise communities will suffer problems from increased households putting further pressure on inadequate but stalled infrastructure which may be awaiting further CIL from nearby but unbuilt developments. There is presently no plausible implementation plan.

The levels of development proposed are in excess of those achieved in the boom years over the last two decades. If these levels cannot be delivered, the total housing must be reduced to a level which is deliverable and viable. This would accord with NPPF para 14 'The government pragmatically recognises that in certain circumstances the disadvantages of seeking fully to meet local needs can outweigh the benefits'.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Plan 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.

Linking the process of Green Belt releases with housing allocations as is the case in HO7 makes the Plan unsound in terms of delivering the objectives of policies SC7, SC5 and SC4 in terms of the South Pennine villages, such as Wilsden and also the green belt between the current Bradford City boundaries. It is our view that the objectives of policy SC7 to maintain separation between settlements in this part of the district can only be effectively delivered by decoupling the two processes. In other words the green belt boundaries should be reviewed within the South Pennine villages based upon policies SC7, SC5 and SC4 and it will only become clear after that process how much housing can be allocated to this area.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

Please be as precise as possible.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Although the level of housing currently allocated to the South Pennine villages is small in terms of the delivering the total housing need for the Bradford district it has a potentially very large impact upon the future sustainability of these communities as independent centres. It is the view of Wilsden Parish Council that it is important that the inspector has the opportunity to consider the needs of these villages as separate entities to the larger centres within the district.

Please note the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date:

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

Please place an 'X' in the appropriate boxes.