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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		
First Name		
Last Name		
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address		
Signature:	<input style="width: 100%; height: 20px;" type="text"/>	Date: <input style="width: 100%; height: 20px;" type="text"/>

**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	5.3	Paragraph		Policy	HO1
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	X
4 (3). Complies with the Duty to co-operate	Yes		No	

**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.**

Housing Requirement and Distribution

Housing Requirement

Policy HO1 proposes a total of 42,100 new houses over the Plan period. This requirement has resulted from various studies, in particular population and household growth projections undertaken by consultants GVA appointed by the Council. There are two main concerns:-

i) The projections take official Government statistics as a starting point, but then a number of assumptions are made, supposedly reflecting other local factors including, critically, “aspirational” assumptions about the effect of economic growth in the District and the resultant effect on attracting population and households. It is considered that these aspirational assumptions are far too optimistic based on recent experience in Bradford District and realistic prospects for economic growth and the attraction of employment development.

ii) It is noted that GVA act for local developers and landowners, and have produced the statistics on household projections/growth and the resulting housing requirement to be accommodated over the Plan period. It is considered therefore that there is a potential conflict of interest.

## Housing Distribution

The distribution of housing (and other) development across the District is covered in the Sub Area Policy section 4. Allocations to Wharfedale are set out in Sub Area Policy WD1. Whilst the majority of development is focussed on the City and larger towns, it is considered that the allocation of 1,600 houses to Wharfedale, and in particular 800 for Ilkley, is too high. The Wharfedale environment and the character of towns such as Ilkley are major assets for the District, but the scale of development proposed and the stated requirement for "significant contribution from green belt changes" (Ilkley) and "some local green belt changes" (Burley in Wharfedale) will have an adverse effect on the environment, amenity and character of the valley and its settlements. In addition, Wharfedale settlements are inevitably much closer to the South Pennine Moors Special Protection Area, and development on green field sites in these settlements will have proportionately greater (adverse) impacts than development in the urban areas.

These are not just "nimby" comments – as well as proposing development levels which would damage Wharfedale in a number of ways, the strategy also misses real opportunities to focus more development closer to where the majority of current and future employment opportunities are located (the City, major towns, the motorway network and adjoining authorities especially Leeds), thereby improving sustainability and reducing the need for commuting, both of which are objectives of the Plan (eg Policy TR1).

This approach would also assist **regeneration of the main urban areas**, including much greater emphasis on using brownfield sites (Policy SC5 – 1). It is noted that the Minister for Planning's Written Ministerial Statement on Local Planning guidance issued in March 2014 stresses the importance of bringing brownfield land into use and makes clear that **"authorities do not have to allocate sites on the basis of providing the maximum possible return for landowners and developers"**. Policy SC5 does give first priority for development to "the re-use of deliverable and developable previously developed land and buildings...." but states that there is insufficient brownfield land to meet all the projected housing requirement. Many brownfield sites will have been classified as "unviable" but it is expected that the Plan should take full account of this Ministerial statement and should clearly demonstrate the extent and availability of brownfield sites which could be developed in the light of the statement, i.e. a re-assessment of viability and deliverability, to ensure that all brownfield opportunities are fully identified and exploited.

**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.

The distribution of development should be reconsidered, with a re-assessment of the contribution which can be made by brownfield development, greater focus on development in and around the City, near to the motorway network, and to the areas of greatest housing need. This would produce a reduction in development levels proposed for Wharfedale, and less pressure for the release of greenbelt land.

*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?**

No, I do not wish to participate at the oral examination

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:**

*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.**

