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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	Cllr	
First Name	[REDACTED]	
Last Name	Kirkham	
Job Title (where relevant)		
Organisation (where relevant)	Harden Parish Council	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Bingley	
Line 4		
Post Code	BD16 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 27.03.14

## **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	<input type="text"/>
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**4. Do you consider the Plan is:**

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

In the opinion of Harden Parish Council, the Core Strategy potentially fails the condition of Soundness as follows:

**Sub Area Policy PN1: South Pennine Towns and Villages**

Harden Parish Council supports the principles set out in SCP 5 and we welcome the assertion at SC7 that:

The Green Belt in the District has a valuable role in supporting urban renaissance and transformation, keeping settlements separate, and the concentration of development, as well as conserving countryside.

and

Section 3. para 3.76 The Plan seeks to prevent the dispersal of development to smaller settlements and open countryside.

and

Section 2 para 3.57 One of the most striking features of the District is the quality of its landscape and in particular the proximity of the main urban areas to areas of high landscape value.

**Sub Area Policy PN1** appears to set targets for the number of homes in each of the villages. In Harden's case the target has been set at 100 following the Habitats Regulation Assessment and South Pennine Moors Birds and Habitats Surveys.

***We would wish these targets to be seen as the maximum for each settlement rather than a target, to keep the focus on previously developed land.***

However, the two safeguarded sites in Harden from the RUDP have problems with access and the estimated number of homes possible on the two sites is less than 100. Even with the addition of the land currently allocated as village green space – which the parish council would oppose -it is difficult to see how 100 homes could realistically be built within the existing

settlement boundary .

HO2 . B3 says ' Specific area based initiatives to help deliver the supply targets will include 'Local green belt releases where consistent with the Plan's sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area.' The ' sources of supply' in Harden are demonstrably 'insufficient.'

Harden Parish Council would however argue that the allocation of greenfield land to build houses within the village and the allocation of greenbelt sites on the edge of the village should be as limited as possible Therefore we propose that the following paragraph in PN1 B be amended as follows;

The Local Service Centres of [ Harden – deletion], Oakworth, Oxenhope and Wilsden will see between them the creation of **500** new homes from sites within the existing settlement boundaries together with some local green belt changes.

[ Addition] ***The Local Service Centre of Harden will see the creation of 100 new homes from sites within the existing settlement boundaries or from very limited, alternative local green belt changes.***

Finally, it is important to prevent development between settlements like Harden and Wilsden and Harden and Cullingworth to preserve their individual character and would oppose any proposal for ribbon-type development along the main roads, all of which would be in the greenbelt, between these settlements.

We support that statement in PN1 B that 'provision will be made for associated community facilities, in particular, health care, open space and recreational facilities at Harden, Oakworth and Oxenhope to address current deficiencies.' Health care is of particular concern to the residents of Harden many of whom are either old enough to remember when there was a doctor's surgery in the village or young enough to have children who might need really local medical care.

## **Figure HO1: 10 Principles For Achieving Sustainable Housing Growth Text from the Core Strategy**

Para 4 Phasing the release of land to ensure that housing growth is coordinated with planned infrastructure provision

Should sites be identified and approved, it is essential that, as part of any development the following are addressed;

- a) the traffic issues of Harden are addressed. The village sits at the junction of four roads, three of which have problems with speeding. The fourth has recently been restricted to 20mph for part of its length with associated works to enforce this. The traffic flow, particularly at peak times is considerable.
- b) Harden Primary School is full and the scope for new building is limited.

## **Policy HO1: The District's Housing Requirement Text from the Core Strategy**

B. After allowing for net completions over the period 2004-13 and an allowance for the projected reduction in the number of vacant homes, the Local Plan will allocate land to meet the remaining requirement for at least 42,100 homes over the period 2013 to 2030;

C. Forthcoming DPDs will assess the projected losses to the existing housing stock from clearance and change of use and increase the level of allocations to compensate accordingly.

It is unclear whether house completions or approved planning applications after 2013 and before the plan comes into effect, possibly in 2015, will be counted towards the maximum. Harden Parish Council would argue that such completions or approvals should be subtracted from the maximum and that references to 2013 in the paragraphs above and in other relevant places throughout the plan should be amended to read 'the start date of the Plan.'

We would therefore propose an additional paragraph D to read

***D. Forthcoming DPDs will assess the projected additions to the existing housing stock from new build and new planning approvals and decrease the level of allocations to compensate accordingly.***

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.

See above

*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:

The Parish Council would like the opportunity to make an oral submission in support of its suggestions to improve the soundness of the Core Strategy as it relates to our community.

*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:

[Redacted Signature]

Date:

27.03.14



**Core Strategy Development Plan Document (DPD) : Publication Draft**

**PART C: EQUALITY AND DIVERSITY MONITORING FORM**

