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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	Mr	
First Name	[REDACTED]	
Last Name	Lister	
Job Title (where relevant)		
Organisation (where relevant)		Arrowsmith Associates
Address Line 1	[REDACTED]	
Line 2		Knaresborough
Line 3		
Line 4		
Post Code		HG5 [REDACTED]
Telephone Number		[REDACTED]
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: 27/3/2014

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		Paragraph		Policy	HO3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	
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.

Although our client considers the Core Strategy to be on the whole sound, he has concerns that policy HO3 is unsound on the basis that the proposals it makes are not based on the most appropriate strategy when considered against an alternative.

Table HO3 demonstrates a baseline distribution of housing requirement based solely on the population of each of those settlements in which it is proposed to allocate housing. For Addingham (which is the settlement which our client is primarily concerned with) table HO3 shows a requirement of 263 houses. Table HO7 shows the level of housing that the Council propose for each of the same settlement. This table shows 200 houses allocated for Addingham.

The Council's justification for allotting a smaller number of houses to Addingham (and other local service centres) than is justified by their populations is that, because they are smaller than the other settlements listed they are therefore less sustainable locations, capable of accommodating less residential development than the larger settlements.

It is this justification (and the resulting strategy outlined in the policy) that we consider not to be an appropriate strategy.

We believe that the housing allocations, when made in future DPDs, should be made in general accordance with the figures set out in table HO3.

This alternative strategy is justified because, despite the Council's rational, each of the settlements listed is sustainable in relation to its own current population. It follows that providing additional housing to each settlement in a pro-rata quantity will maintain that level of sustainability in each settlement and allow an appropriate amount of community facilities to be provided.

In the case of Addingham, policy WD1 in the core strategy proposes that associated community facilities will be provided along with the projected houses. The result would be a settlement which is more sustainable and capable of accommodating the 263 figure shown in table HO3 rather than the 200 currently proposed.

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.

In order for the plan to be sound, the alternative strategy outlined above should be set out in the core strategy rather than that proposed by the Council.

This would mean proposing 263 houses to be allocated at Addingham rather than the current 200. The alterations may therefore also involve similar changes for other settlements to ensure that the figures set out in table HO3 are used instead of those in table HO7.

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"/>
<input type="checkbox"/>

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:

In order to ensure that our client's opinions are adequately presented.

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:

27/3/2014