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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	Ms	
First Name	██████████	
Last Name	Stallworthy	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████	
Line 2	██████████	
Line 3	ILKLEY	
Line 4		
Post Code	LS29 ██████	
Telephone Number	██████████	
Email Address	████████████████████	
Signature:	████████████████████	Date: 29 th March 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	3	Paragraph	3.101	Policy	SC7
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	x
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.

The NPPF states (paras 79 and 80) that “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. “

“Once established, Green Belt boundaries should only be altered in exceptional circumstances “ (para 83)

From the Plan it appears that more than 25% of Bradford District’s new homes will be built on green belt and for Ilkley this will be at least 55%. It is not wholly clear in the Plan what the “exceptional circumstances” are to justify the need for such a significant release of green belt land particularly in the Ilkley area. Such a high level demand would appear to ignore or run counter to the policy intent of the NPPF section on the Green Belt.

The Plan’s target for the use of brownfield land across the District for new housing development is a minimum of only 50% which it states as “realistic” (Policy HO6). It cites land contamination, residual contamination and land

quality issues resulting in problems attracting investment (para 4.5.176 et seq).

Clearly brownfield sites are less attractive to developers as there can be significant costs involved with cleaning up a brownfield site to be used for housing. Developers may prefer to go for a greenfield/greenbelt site instead but these can throw up their own challenges and costs in terms of things like access, flooding, historic and wildlife protection issues. The Council therefore has an important part to play in complying with the NPPF and attracting and working with potential developers to increase the take-up of brownfield sites. I would strongly recommend that the target set should be more "stretching" rather than "realistic" (say 75% rather than 50%) to bring about a step change in approach.

The Plan reports (para 5.3.156) "The total number of empty homes at October 2012 was 9,731 (4.6% of the total district stock) of which 5,413 were empty for longer than 6 months." In the Understanding Bradford District report of September 2013 it was reported there are now over 2,300 fewer long term empty homes in the District than in April 2008. But 2.53% of homes are classed as long term empty (empty for longer than 6 months) and this is still higher than West Yorkshire (1.63%) and England (1.12%). City ward, Manningham, Heaton and Little Horton wards have the highest levels of empty homes within the District. Council performance is disappointing – and at this rate it will be more than 10 years before the number of empty properties is reduced to zero! I would strongly recommend that the Council invests more resources so that these empty properties can be released for rehousing more quickly.

It is interesting to note that the Minister for Housing Kris Hopkins (MP for Keighley) is reported as saying "There is a fear that green spaces in Keighley and Ilkley are under threat. However the housing population boom in the district is not in Keighley or Ilkley but in the centre of Bradford and that is where new developments should be concentrated. Bradford Council owns lots of land particularly around the canal area and there is great potential for much needed housing to be built there. There is also great scope to bring empty houses back into use." (Ilkley Gazette 27th March 2014)

In the same article Mt Hopkins is also quoted as having consulted the Planning Minister Nick Boles "Nick has already visited my constituency to hear local views. He has also made very clear to me that in the governments view brownfield land must be used for development wherever possible. Councils are expected to encourage the re-use of brownfield land if not of high environmental value."

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.

As described above at Section 5 – the Plan would appear to ignore or run counter to the policy intent of the NPPF section on the Green Belt.

The NPPF states that “Green Belt boundaries should only be altered in exceptional circumstances”. The Plan therefore needs to make the case for those “exceptional circumstances” rather than concentrating on “recycling of derelict and other urban land”.

I would strongly recommend that the Policy HO6 target for the use of brownfield land across the District for new housing development should be more “stretching” rather than “realistic” (say 75% rather than 50%).

I would strongly recommend that the Plan commits the Council invests more resources so that empty properties can be released for rehousing more quickly, and reduce the overall housing development need.

If my recommendations are adopted, then business case for the release of greenbelt land will need to be reworked – and to identify whether there is any justification for “exceptional circumstances” 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?

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

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:

29th March 2014

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.

