



For Office Use only:		
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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	██████████	
Last Name	Smith	
Job Title <small>(where relevant)</small>	██████████	
Organisation <small>(where relevant)</small>		
Address Line 1	████████████████████	
Line 2	Saltaire	
Line 3		
Line 4		
Post Code	BD18 ██████	
Telephone Number	██	
Email Address	██	
Signature:	██	Date: 31.03.2014

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	5.3	Paragraph	143	Policy	
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4. Do you consider the Plan is:

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

This section of the plan is unsound as the space standards listed don't take into account whether a home is built over 1, 2 or 3 storeys. On average, adding a storey to a dwelling will increase circulation space by approximately 10m²; this should be accounted for within the space standards.

For example; a 3 bed 5 person single storey dwelling or flat at 93m² is relatively generous, but a 93m² 3 bed 5 person house over 3 storeys is nowhere near large enough to support family living, incorporating basic furniture and activity spaces.

It is critical that Bradford Council review the draft figures and take into account the planning of dwellings over 1, 2 and 3 storeys. The London Housing Design Guide would be a good place to start. The London space standards are the best standards available at present in that they offer a much needed improvement on the size of homes currently being built in England.

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.

Bradford Council should look to amend these figures to take in account the differing space requirements for 1, 2 and 3 storey dwellings. The London Housing Design Guide gives the following Space Standards. My recommendation would be that these figures be adopted as a minimum. There is no reason that homes falling below these levels should be built because they would not be fit for the activities people need to carry out within their homes.

Single storey dwelling

- 1b2p – 50m²
- 2b3p – 61m²
- 2b4p – 70m²
- 3b4p – 74m²
- 3b5p – 86m²
- 3b6p – 95m²
- 4b5p – 90m²
- 4b6p – 99m²

Two storey dwelling

- 2b4p – 83m²
- 3b4p – 87m²
- 3b5p – 96m²
- 4b5p – 100m²
- 4b6p – 107m²

Three storey dwelling

- 3b5p – 102m²
- 4b5p – 106m²
- 4b6p – 113m²

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
x	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:

If the inspector deems it necessary, I would be happy to participate at the oral examination to put forward the case for revising the current space standards.

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]

Date:

31.03.2014

Core Strategy Development Plan Document (DPD) : Publication Draft

