



For Office Use only:			
Date			
Ref			

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	Mr
First Name	[REDACTED]	[REDACTED]
Last Name	Tunbridge	Wood
Job Title (where relevant)	[REDACTED]	[REDACTED]
Organisation (where relevant)	Yorkshire Greenspace Alliance	CPRE West Yorkshire
Address Line 1		[REDACTED]
Line 2		[REDACTED]
Line 3		Sheffield
Line 4		
Post Code		S10 [REDACTED]
Telephone Number		
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: [REDACTED]

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.

For Office Use only:			
Date			
Ref			

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" value="Policy HO5"/>
---------	----------------------	-----------	----------------------	--------	---

4. Do you consider the Plan is:

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

We support a density target but a minimum of 30 dwellings per hectare is far too low. The targets and indicators are effectively meaningless, because developers will prefer to build sites are around 30 dwellings per hectare in any case. There is a wealth of evidence that a pattern of polycentric, compact settlements is the most likely to be sustainable, and the District is well-suited to this, but new developments need to counterbalance the suburbanising effect of low densities seen in developments of recent decades. To actively sustain public transport systems, average densities of neighbourhoods need to be at least 60 dwellings per hectare, and high densities are also very beneficial in terms of improving the energy efficiency of dwellings, conserving land for greenspaces within and between settlements, and supporting local amenities. In our view many settlements in the District would be much better served by a few compact, well-designed high density interventions that would complement the existing mix of housing types, rather than by 'more of the same' estates. Of course, higher densities would also make a huge contribution to conserving the total land supply in the District.

Because the policy lacks targets, and has a minimum density close to what is typically achieved, it will be ineffective in increasing density, and is therefore unsound.

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 policy should substantially increase the minimum density for new developments and set robust targets for the proportion of new development that achieves much higher densities. This should be accompanied by a methodology to ensure the type, tenure and density of new development in a settlement complements the existing housing stock in that settlement to improve the overall mix.

There should also be a checking policy to avoid higher density targets being used to justify inappropriate intensification within existing neighbourhoods or to compromise open space provision within settlements.

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:

To further represent the views and concerns of the Yorkshire Greenspace Alliance in the light of all parties' consultation responses and the questions posed by the Inspector.

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:	<input type="text"/>	Date:	26 March 2014
---------------	----------------------	-------	---------------