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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	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.

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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" value="Figure HO1"/>
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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.

Table HO1 explains clearly and robustly how the housing requirement has been calculated, and we hope this will avoid lengthy deliberations at Public Examination about the methodology and statistical evidence. However, in our view, the interpretation of that evidence to arrive at a housing requirement is deeply flawed and will result in a damaging and unsustainable pattern of development.

There are three key problems.

1) The difference between previous targets and completions gives a figure for residual unmet need 2004-2013. Whilst that unmet need may statistically exist, the Plan needs to clarify why it has arisen and then analyse the extent to which meeting that backlog is a realistic objective. For example, if the previous target for 2004-13 was too ambitious due to market conditions, especially as it covered a period of economic recession, then attempting to meet a historical shortfall against that previous target is impractical, and should be deemed unsound because it could not realistically be delivered during the plan period, no matter how laudable the objective of meeting housing need. This is especially true for affordable housing, the provision of which consistently falls well below target in most local authorities, and for which this draft Plan lacks sufficient delivery mechanisms.

2) Policy HO1(b) plans to allocate land to allow supply of *at least* the housing requirement. There is good reason to have an aspirational, ambitious target to meet housing need, especially for affordable housing, but since there will probably be a shortfall in delivery against that target there is certainly no need to allocate *more* land than might supply 42,100 homes. This is why phasing - as eloquently described in Figure HO1 - is so important to the soundness of the Plan: whilst it is necessary to identify sites where development might take place if the full requirement were to be met, it is inevitable that some of those sites will be more suited to implementing the Plan's spatial objectives than others, so it would be very wrong to allow development on less suitable sites while more suitable sites remain.

3) With reference to our comments on Policies SC5 and SC7, we are very concerned that the housing requirement places such pressure on the total amount of land in the District that some damage to the countryside and to the character and function of settlements will occur. If the District did succeed in meeting its full requirement then, by default, the Plan sets the District up for a wholly unsustainable

pattern of development post 2030, because all available sites at that time would be in unsustainable locations. A 15 year Plan that is predicated on unsustainable development beyond the plan period cannot be considered sound. Consequently the long-term exhaustion of suitable sites should be considered either to justify a housing provision target lower than the objectively assessed need, and/or to require significant increases in development density in order to conserve land.

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.

Table HO1 should include:

- a clear statement of the proportion of historical shortfall the Plan proposes to meet, with supporting text to explain how the realism of previous targets and reasons for the backlog are taken into account;
- an indication of how long-term limits to land supply within and beyond the Plan period should be reflected in the housing requirement, and to what extent this informs the types and densities of development that will be permitted.

Policy HO1 should:

reflect an adjusted housing requirement informed by our suggested changes to Table HO1; plan to allocate land to enable supply of *up to* that adjusted housing requirement, supported by phased release and density requirements to conserve land supply for the longer term.

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:

Date:

26 March 2014