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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="Policy HO2"/>
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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.

Policy HO2 does tries to tackle a very difficult to challenge, but succeeds so only partially. It amasses sufficient land to meet the proposed housing requirement, but in doing so takes some potentially catastrophic risks with the long-term sustainability of the District.

Following on from our comments on Policy HO1, we are very concerned that allocating all safeguarded land from previous UDP and urban extensions and significant unpeeling of the Green Belt around many settlements results in exhaustion of land supply post 2030, and therefore this does not actually plan for the future. The Plan states that proposed Green Belt changes have been selected carefully so as not to harm the function of the Green Belt. Whether or not this holds true, if the District were to succeed in meeting its housing requirement by 2030 then, barring major windfalls or new mechanisms to bring forward brownfield sites, the only way for the District to supply more housing land after 2030 would be to allocate sites currently considered less suitable and sustainable. In other words a key effect of implementing this proposed Plan in full would be a less sustainable settlement pattern and more encroachment into valued countryside after 2030.

Examining Table HO2 in the light of these concerns, we see that only 20,471 of the planned 42,087 dwellings can be accommodated on SHLAA sites that do not have policy constraints. We accept that, in some cases, policy constraints may have to be compromised; but in this Plan over half of the entire housing requirement needs policy constraints to be compromised. Such an approach is plainly flawed, because it demands that long-established policy constraints, put in place for sound reasons to promote sustainability and to protect and enhance environmental and cultural amenity, be cast aside on a wholesale scale.

Para 5.3.29 states that "*The compromise approach was therefore to discount only those sites where national policy would be reasonably unequivocal that development could not place such as in areas of international wildlife importance or highest risk of flooding*".

This statement confirms our worst fear: namely that any future development after 2030 could only be accommodated on sites such as in areas of international wildlife importance or highest risk of flooding.

Meanwhile we see no analysis of the potential scale of sites which may be much more suited to

fulfilling spatial objectives and the Principles for Sustainable Housing Growth set out Figure HO1, but which are not identified in the SHLAA.

Consequently we are offered a Core Strategy which relies heavily on sites that are available but less suited to the spatial objectives, and does not seek ways to bring better-suited sites forward that are not currently available. It is inconceivable that such a strategy could be effective in delivering sustainable development, and it should therefore be considered 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.

In our view, Policy HO2 should be more radical in its approach to translating housing requirement into sources of land. It should state that:

- using all the sources of land currently identified would meet the housing requirement but only at the expense of compromising legitimate policy constraints, and that there is therefore a sustainability risk to meeting the housing requirement on the existing, available sources of land;
- that mitigating this risk requires a clear set of mechanisms, including phasing to de-prioritise less suitable sites, increasing development densities to conserve land, and urgently seeking new sources of more suitable sites not currently in the SHLAA.

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