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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	[REDACTED]	
Last Name	FINNIGAN	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	BRADFORD	
Line 4	WEST YORKSHIRE	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 31 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?

Sections		Paragraphs	5.3 Table HO1 Table HO2	Policies	Sub-Area Policy BD1 C 1. Sub-Area Policy BD2 E Policy HO2 B 2.
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	NO
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.

1. Grounds of Representation

- 1.1. I contend that the Plan is unsound in that it is not positively prepared/ not effective/not justified/contrary to national policy
- 1.2. My particular concern relates to the number of houses allocated to Bradford SE which, at 6000 is disproportionately high, being 14.3% of the allocation for the District as a whole.
- 1.3. The settlement distributions set out in the Core Strategy Development Plan Document Publication Draft (the "Publication Draft") work from a remaining requirement number of 42,087 as set out in Table HO1.
- 1.4. This Table works from a number at line G of 37,400 being described as the "Housing Requirement Study Based Housing Requirement 2013-30" based on 17 years at 2200 houses per year.
- 1.5. Table HO3 allocates 28,324 houses to the Regional City of Bradford. That a higher proportion of the District's houses that would be justified by population alone
- 1.6. Table HO3 then shows a further distribution to Bradford SE based on the numbers at Table HO1 and solely on population of 4,878.
- 1.7. However the Publication Draft adjusts those figures at Table HO4 upwards by 336 for the Regional City of Bradford and by 1122 for SE Bradford. The principle justification for this disproportionate adjustment or "Reality Check" as the Plan describes it is the availability of a large tract of open Green Field Land in the Holme Wood Tong area.
- 1.8. However for reasons which have been given in representations by the Tong and Fulneck Valley Association, which I support, there are powerful reasons why this tract of land should not be made available by Green Belt release for large scale housing development, and I contend that the distribution figures in Table HO4 should be readjusted to reduce the numbers allocated to Bradford SE.
- 1.9. I contest the figure at line G of Table A. In my view the number of annual completions of 2200 is too large and should be reduced.
- 1.10. At the Council meeting on 10 December 2013 when the Publication Draft was approved there was widespread concern that the housing targets in the Publication Draft were unachievable, and that their inclusion would inevitably lead to the designation of a disproportionately high amount of Green Belt land as required for release, and that if released the council would be unable to ensure that brownfield sites were developed first. The Conservative Group spokesman said that he would confidently predict that by 2030 Bradford would have built no more than 25000 new homes, but that the vast majority of those would be on Green Belt sites, and that Bradford's regeneration of brownfield sites would be a continuing problem. There appeared to be no arguments put against that suggestion.
- 1.11. It seems perverse and illogical to produce a plan based on a mythical estimate of housing need. A more positively prepared Plan would take a realistic view of the possibility of economic regeneration over the next 15 years.
- 1.12. The Housing Requirements Study Addendum Report by GVA with Edge Analytics dated August 2013 shows various scenarios for average household change over a 17 year period ranging from 1,646 at Figure 3.1 SNPP- 2010 trend based to 2, 490 at Figure 3.3 Employment led REM.
- 1.13. This latter figure is clearly inappropriate. Indeed in the absence within the Plan or in the supporting Evidence Base of any clear strategy as to how Bradford can produce economic growth as

the levels required to justify the figures in Figure 3.3 I suggest that the SNPP figures in Figure 3.1 should form the base of the Publication Draft Strategy.

1.14. Accordingly if the Figure at line G in table A were reduced to the trend based projection of 1646 the total figure in line G would be 27,982, a total reduction of 9418. Keeping the same allowance for reduction in vacant homes the total requirement would be 32,669 which seems to me to be a more realistic reflection both of need and ability to match the need, although clearly there is room for some adjustment to allow for unknown (if unlikely) changes to the economic or social outlook for Bradford over the next 15 years.

1.15. Accordingly I would ask for the total number in Table A to be substantially adjusted downward with consequential amendments throughout the Plan. I also ask for the proportion of the finally accepted number of houses for the District intended to be allocated to Bradford SE to be readjusted to accord to population based proportionality.

HO46. 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 Plan to be amended throughout to reflect a total Housing requirement for the next 15 year period to be shown in Table H0I as 32669 and for the allocation of houses to Bradford SE to be proportionate to population

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.

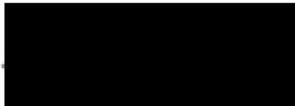
7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?

	No, I do not wish to participate at the oral examination
YES	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:

Whilst we have endeavoured to put our case clearly we feel that it may help clarify any areas of uncertainty, and to ensure that there is full co-ordination of evidence in relation to each of our representations if we were to be examined orally.

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:	31 March 2014
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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.

1. Do you live within or have an interest in the Bradford District?

