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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		
First Name		
Last Name		Brock
Job Title (where relevant)		
Organisation (where relevant)	Gladedale Estates Ltd	WYG
Address Line 1		
Line 2	Westerham	
Line 3	Kent	
Line 4		Leeds
Post Code	TN16	LS6
Telephone Number		
Email Address		
Signature:		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?

Section	See Section 5 below	Paragraph	See Section 5 below	Policy	See Section 5 below
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4. Do you consider the Plan is:

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

INTRODUCTION

WYG Planning has been instructed by Gladedale Estates to make a representation to the City of Bradford MDC Core Strategy DPD Publication Draft in relation to land to the east of Otley Road, Menston (the Site).

The Site is within the designated Green Belt and comprises mostly level fields with some mature trees. It extends between Chevin Avenue in the south and Imperial works in the north. The site has a long road frontage to Otley Road. Immediately to the opposite side of Otley Road is an established residential area which forms the eastern side of the main built up area of Menston.

The Site area is approximately 4.1 hectares. The most recent SHLAA identifies the Site (Ref ME/013) as "amber" (Potentially Suitable – Local Policy Constraints) confirming it has the potential to deliver 107 homes. Whilst it is not explicit within the SHLAA we understand that the current Green Belt designation is the policy constraint being referred to in the SHLAA table.

The Site is considered to be in a sustainable location to the east of the built up area of Menston. Menston falls within the Wharfedale sub area and is defined a Local Service Centre, which sits behind the Principal Town of Ilkley and identified for growth. The Site benefits from good access to services and facilities. We consider that the Site can be sensitively developed in a way that represents a logical rounding off to the east of the settlement.

REPRESENTATION

We make the following representations on behalf of Gladedale Estates:

Policy P1: Presumption in Favour of Sustainable Development

This policy has been added since the last consultation of the Core Strategy DPD and reflects the main aim and objective of the National Planning Policy Framework (NPPF). We therefore **support** the inclusion of this Policy in the Publication Draft.

Policy SC4: Hierarchy of Settlements

We **support** Menston as a Local Service Centre within the Settlement Hierarchy, and second in the Wharfedale sub area hierarchy behind the Principal Town of Ilkley.

Policy SC5: Location of Development (Support Subject to Wording Amendments)

Criteria (3) currently read "Third Priority to Local Green Belt releases to the built up areas of settlements in sustainable locations"

We would recommend that criteria (3) are reworded to read: "Third priority to Local Green Belt releases in the built up areas of settlements in sustainable locations and where it would not prejudice Green Belt purposes". This would more accurately reflect the NPPF.

Policy SC7: Green Belt

We **support** the selective review of the Green Belt to deliver housing growth throughout the Plan Period. We recognise that the Site Allocations DPD will identify the most appropriate sites to release.

Policy HO1: The Districts Housing Requirement

We **support** the principle that the Plan will need to allocate land for at least 42,100 homes over the period 2013 to 2030, and emphasise that this should be a minimum allowing sufficient flexibility for review and the maintenance of supply to meet the Districts housing needs.

Policy HO2: Strategic Sources of Housing Supply (Support Subject to Wording Amendments)

Part (B.3) of Policy HO2 currently reads "Local Green Belt releases where consistent with the Plan's sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area". We consider that the latter part of these criteria is superfluous and the policy should be amended to read "Local Green Belt releases where consistent with the Plan's sustainability principles."

In addition to the comments relating to Policy HO2 specifically, it is also noted that whilst there are several references to the need for a Green Belt review to deliver housing, the Core Strategy Publication Draft is silent on the strategy for undertaking such a review. Given the significant number of new homes that the Council has identified will need to come from Green Belt releases (11,000), it is considered that there should be a clear and coherent strategy set out in the Core Strategy which sets out a framework for undertaking the review, having regard for the settlement hierarchy.

Policy HO3: Distribution of Housing Development

We **support** the level of housing growth (400) identified for Menston as a Local Service Centre behind the principal town of Ilkley. This Policy highlights the importance of Menston in contributing to the Wharfedale sub areas housing need, particularly given the cautious growth approach adopted for Ilkley, as the principal town given the Council's desire to direct growth away from sensitive designated areas.

Policy HO7: Housing Site Allocation Principles (Support Subject to Wording Amendments)

Part (A) refers to the need to allocate sufficient deliverable and developable sites to meet the targets set out in Policies HO1 and HO3. In line with our previous comments, we consider that Part (A) is amended and also includes for the provision to undertake a Green Belt review so as to ensure that land which is currently designated as Green Belt, in sustainable locations, well connected to the settlements and which, if removed, would not prejudice Green Belt purposes, is considered when allocating housing sites. Part (A) should therefore read:

"The need to allocate sufficient deliverable and developable sites, including from Local Green Belt releases, to meet the targets set out in the Core Strategy Policies HO1 and HO3".

Part (E) of Draft Policy HO7 should also be amended to reflect that Green Belt land will be released to deliver some 11,000 homes across the Plan Period. It should also be stated in the Policy that in some circumstances the release of Green Belt land may offer the most sustainable and deliverable option to meet housing needs.

- 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.

SUGGESTED CHANGES TO MAKE THE PLAN SOUND:

Policy SC5: Location of Development

Criteria (3) currently read "Third Priority to Local Green Belt releases to the built up areas of settlements in sustainable locations"

We would recommend that criteria (3) are reworded to read: "Third priority to Local Green Belt releases in the built up areas of settlements in sustainable locations and where it would not prejudice Green Belt purposes". This would more accurately reflect the NPPF.

Policy HO2: Strategic Sources of Housing Supply

Part (B.3) of Policy HO2 currently reads "Local Green Belt releases where consistent with the Plan's sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area". We consider that the latter part of these criteria is superfluous and the policy should be amended to read "Local Green Belt releases where consistent with the Plan's sustainability principles."

In addition to the comments relating to Policy HO2 specifically, it is also noted that whilst there are several references to the need for a Green Belt review to deliver housing, the Core Strategy Publication Draft is silent on the strategy for undertaking such a review. Given the significant number of new homes that the Council has identified will need to come from Green Belt releases (11,000), it is considered that there should be a clear and coherent strategy set out in the Core Strategy which sets out a framework for undertaking the review, having regard for the settlement hierarchy.

Policy HO7: Housing Site Allocation Principles

Part (A) refers to the need to allocate sufficient deliverable and developable sites to meet the targets set out in Policies HO1 and HO3. In line with our previous comments, we consider that Part (A) is amended and also includes for the provision to undertake a Green Belt review so as to ensure that land which is currently designated as Green Belt, in sustainable locations, well connected to the settlements and which, if removed, would not prejudice Green Belt purposes, is considered when allocating housing sites. Part (A) should therefore read:

"The need to allocate sufficient deliverable and developable sites, including from Local Green Belt releases, to meet the targets set out in the Core Strategy Policies HO1 and HO3".

Part (E) of Draft Policy HO7 should also be amended to reflect that Green Belt land will be released to deliver some 11,000 homes across the Plan Period. It should also be stated in the Policy that in some circumstances the release of Green Belt land may offer the most sustainable and deliverable option to meet housing needs.

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:

To reserve our right to attend and present our case, if necessary.

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 Signature]

Date:

31 March 2014

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.