

## Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012

### Publication Draft - Representation Form

Monday 17<sup>th</sup> February until Monday 31<sup>st</sup> March 2014

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This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:

[www.bradford.gov.uk/ldf](http://www.bradford.gov.uk/ldf).

For further information you can contact the Local Plan Group by:

- Emailing us at: [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- Phoning us on: (01274) 433679

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Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- Part A – Personal Details
- Part B – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- Part C – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

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Please return this completed representation form to the Local Plan Group by either:

- E-mail to: [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- Post to: Local Plan Group, City of Bradford Metropolitan District Council,  
2<sup>nd</sup> Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

**For your representation to be 'duly made' the Council must receive it no later than 5pm on Monday 31<sup>st</sup> March 2014**

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
First Name		
Last Name		Binns
Job Title (where relevant)		
Organisation (where relevant)		David Hill
Address Line 1		
Line 2		
Line 3		Skipton
Line 4		North Yorkshire
Post Code		BD23
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.

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		Paragraph		Policy	X
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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.

See attached sheet

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.

See attached sheet

*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:

See attached sheet

*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

# Core Strategy

## Publication Draft for Bradford

We are writing to object to the Core Strategy on the following grounds:-

### 1. Phasing of Development

The Core Strategy Draft Publication trajectory is shown in graph form in Appendix 6 of the Draft Publication. The graphs clearly show that the housing supply backlog in Bradford District will only get back in line with housing requirement in the area by 2028 - 2030. This means that there will be insufficient housing in the District until the very end of the plan period. Any slippage in delivery of the sites allocated in the earlier phases will exacerbate this problem.

The District is failing to fulfil its housing requirement and there should be a large push for sites in the early part of the trajectory to clear the backlog of housing requirement to bring the District back in line with housing targets.

The Council's proposal is to lag behind its targets for the whole of the plan period and then to rely on house completions at over four times the present level to catch up. This doesn't seem realistically achievable.

The proposed strategy isn't going to deliver the houses required in Bradford.

### 2. Distribution of Housing

The distribution of the housing supply doesn't seem feasible either. The Publication Draft proposes 3,500 dwellings in the Publication Draft whereas the SHLAA only provides 2,752 potential dwellings. This gives a shortfall of 748 dwellings. Canal Road suffers a similar problem, with a shortfall of 605.5 dwellings. Bradford South East is down 682, Bradford North East 104, Bradford North West 308.5, Cullingworth 109, Harden 14 and Oxenhope 49.5. In total the SHLAA cannot provide 2,620.5 dwellings that the Core Strategy Publication Draft has allocated.

The draft plans still include sites in locations that are not deliverable. The inclusion of these sites will cause additional shortage in houses delivered.

### Bradford South West

Bradford South West is underallocated and has a surplus of 607 SHLAA site dwellings. Therefore, it would make sense to allocate Bradford South West with more dwellings that could make up for the current 2,620.5 shortfall. Especially since the justification for its low allocation is due to land supply restraints.

### Keighley

Keighley has a surplus of 730 dwelling sites above the Core Strategy Publication Draft allocation. The allocation of 4,500 dwellings whereas the previous Further Engagement Draft was at 5,000 dwellings. Keighley has the land supply to take these extra 500 dwellings and local infrastructure and transport links to support them. It could therefore help to redress the 2,620.5 dwelling shortfall in the Draft Publication.

### Bingley

Bingley has a similar surplus to Keighley, with 796 dwellings more than its allocation. It is a sustainable location with good transport links and so it should get a higher allocation than the 1,400 dwellings of the Publication Draft. The reason for its low allocation is that it would encroach on the Green Belt, but this would be the case in many other areas and so it doesn't seem to be in line with the rest of the Core Strategy Publication Draft.

### Silsden

Silsden is named as a local growth centre in the Draft Publication because it is a sustainable location with good transport links. However, its allocation for housing has reduced from 1,700 to 1,000. The reason for this being that sites to the east of Silsden fall within a 2.5km buffer zone to the South Pennine Moors. Silsden's allocation as a centre for growth should be given more weight and the 2.5km buffer zone is being used as a very blunt instrument to prevent development. We understand that this site had been assessed previously and the allocation did not affect the planned development in Silsden. Under the current allocation of the Draft Publication, Silsden has a surplus of 809 dwellings and so it has the potential to significantly contribute to the 2,620.5 dwelling shortfall in the Draft Publication.

A large area of land to the east of Silsden has been earmarked for development in previous plans and the land is not in the Green Belt. A proper appraisal of the buffer zone should be carried out to test it against the requirements of land for housing.

## 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.

<b>1. Do you live within or have an interest in the Bradford District?</b>			
Yes		No	I have an interest
<b>2. Gender:</b>			
Male		Female	Transgender
<b>3. Age:</b>			
16 or under		36 to 45 years	65 years +
16 to 25 years		46 to 55 years	
26 to 35 years		56 to 65 years	
<b>4. Do you consider yourself to have a disability?</b>			
No		Mental Health Issue	Hearing Loss
Physical Disability		Sight Loss	Deaf
Learning Disability		Blind	Other substantial and long term condition
<b>5. Ethnic Origin:</b>			
White English / Welsh / Scottish / Northern Ireland / British		Mixed Other	Black or Black British Other
White Irish		Asian or Asian British Indian	Chinese
White Eastern European		Asian or Asian British Pakistani	Arab
White Other		Asian or Asian British Kashmiri	Other
Mixed White / Black Caribbean		Asian or Asian British Other	Don't Know
Mixed White / Black African		Black or Black British Caribbean	Gypsy or Traveller
Mixed White / Black Asian		Black or Black British African	
<b>6. Religion:</b>			
No religion		Hindu	Sikh
Christian		Jewish	Other
Buddhist		Muslim	
<b>7. Which of the following best describes how you think of yourself?</b>			
Heterosexual / Straight		Gay	Lesbian
Bisexual		Other	
<b>8. Equality Monitoring</b>			
I do not wish to participate in this monitoring exercise			