

For Office Use only:		
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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)
<b>Title</b>	Mr	
<b>First Name</b>	[REDACTED]	
<b>Last Name</b>	Elsegood	
<b>Job Title</b> <small>(where relevant)</small>		
<b>Organisation</b> <small>(where relevant)</small>		
<b>Address Line 1</b>	[REDACTED]	
<b>Line 2</b>	[REDACTED]	
<b>Line 3</b>	[REDACTED]	
<b>Line 4</b>	Ilkley	
<b>Post Code</b>	LS29 [REDACTED]	
<b>Telephone Number</b>	[REDACTED]	
<b>Email Address</b>	[REDACTED]	

<b>Signature:</b>	[REDACTED]	<b>Date:</b>	07 March 2014
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#### 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	5.4	Paragraph		Policy	EN2
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes	?	No	?
4 (2). Sound	Yes		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.**

The (relatively small) areas of Grade 3 agricultural land are also the habitats for the majority of wildlife and valuable plant species. In terms of wildlife, there are populations of deer which use these pastures for grazing and corridors of transit. There are populations of wetland birds, including heron and curlew, to be seen and respected, and the wetland wildlife includes invertebrates which provide food for voles, shrews, mice and other species, all of which are food sources for short-eared owls, buzzards, sparrow-hawks, kestrels and the red kites, recently re-introduced. I see these species on the fields on a daily basis.

Construction on these moorland margins would deny corridors of transit and sources of food, so they would cease to be wildlife habitats in any sense which is consistent with the stated policy of biodiversity.

The existence of these visitors and residents is confirmed in the Evidence Base but little reflected in the Core Strategy. Construction on the moorland fringe is commented upon in the Core Strategy in terms of the South Pennines SPA but, as Menston is technically just outside the SPA, the concern is expressed in terms of the risk of a 'trample zone' if housing is built close to the boundary of the SPA. However, in recent years – not reflected in the Evidence Base – the higher rainfall has encouraged the proliferation of species and the expansion of the populations using these habitats. Where once I would see one or two roe deer in the field behind my property, I now regularly see five or six deer grazing on the pasture land and the wild flowers, and the ponds which form there are frequently visited by heron, curlew and plover. The birdlife includes pheasant, nuthatch, robins and wrens, numerous birds of prey and occasional seabirds.

The Evidence Base clearly indicates (section 10.8) that Bradford District has limited coverage of woodland. All the moorland slopes in and around Menston enjoy a woodland coverage of some variety and this encourages the diversity of birdlife including predators. To proceed as proposed with the construction in these areas will be extremely detrimental and completely contrary to the policy objectives as outlined in the Core Strategy. In that respect, proposals for housing development on the moorland slopes and pasture land both to the north and the south of Menston would be UNSOUND environmentally.

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.

The Council's own evidence shows that Bradford District lacks woodlands and high-grade agricultural land. The only areas of these valuable environmental assets in the north of the District are in Wharfedale. The Evidence based also indicates that several species survive on the wet pasturelands in the valley and moor sides, and migratory/transit routes are already inhibited by highways.

The modification is simply a matter of examining the available evidence instead of compiling it and then dismissing or 'burying' it in excess verbiage.

If the woodlands, wetlands, moor sides and pastures of the Wharfe Valley are not better protected against housing development, they will cease to be the "character area" which much of the Core Strategy extolls.

*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:

Because Bradford MDC Planning Dept. have shown themselves to be untrustworthy and selective in their reportage and use of data. There is no evidence to suggest that they have taken proper account of wildlife or the migration patterns of wildlife on the wet pasturelands which are proposed for future construction nor of the Green Belt Identified for possible 'deletion'. The effects on wildlife could be devastating if due account is not taken of the value of these moorland pastures and their drainage /reservoir function.

*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:

07 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.

