

## 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			

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### 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	DR	
First Name	[REDACTED]	
Last Name	Melling	
Job Title <small>(where relevant)</small>	Senior Conservation Officer	
Organisation <small>(where relevant)</small>	RSPB	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	Huddersfield	
Post Code	HD8 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 7 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	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<input type="text" value="SC8"/>
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>
4 (2). Sound	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="text" value="Yes"/>	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.**

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.

RSPB acknowledges the difficulty Bradford MDC has when so much of the borough is internationally protected as both SPA and SAC. This makes it difficult to allocate necessary developments like housing without impacting on these protected areas. RSPB supports the principle of zones to protect the South Pennine Moors SPA in policy SC8. We think that Zone A restricting developments within 400m of the SPA is pragmatic and reasonable. Birds such as Curlew (a breeding bird assemblage qualifying feature for the SPA) breed on the SPA moorlands yet chaperone their young to visit farmland (pastures and hay meadows) surrounding the SPA. Curlew and Golden Plover have nidifugous (nest-fleeing) young that follow their parents immediately after hatching, contrasting with nidicolous (nest-dwelling) young that hatch blind and helpless. It is therefore of paramount importance that no Greenfield developments are permitted within 400m of the SPA. In addition, developments could have a displacement effect which could prevent birds from utilising fully the SPA in the vicinity of such developments. Domestic cats and dogs from nearby developments might also predate nests or young of ground-nesting birds. Because of the issues of disturbance/displacement and domestic pets, we would also recommend that there should result in no significant increase in the number of domestic dwellings on brownfield sites within 400m of the SPA.

RSPB would also like to support Zone Bi which safeguards supporting habitats within 2.5km of the SPA. Golden Plovers are a primary qualifying feature of the SPA and they only breed within the moors, but feed on farmland surrounding the SPA. Studies in the Peak District showed female Golden Plovers feed during the day within 2.7km of the nest whereas males feed at night, and travel further, up to 7.2km from their nests. They make much use of invertebrate rich grasslands with a short sward. Such grasslands may be managed as pasture or hay-meadow. If these important feeding grasslands were to be lost it could have a significant impact on the population of breeding Golden Plovers in the SPA.

Habitats that are functionally linked to the SPA will all be grassland sites, which may be managed as pasture (grazing) or hay meadow (mowing). They will usually be unimproved or semi-improved and will have a relatively rich floral and fungal diversity. They are likely to have a high water table so will be damp or wet. Soft Rush (*Juncus effusus*) can dominate wet pasture and render it unsuitable for feeding or breeding wading birds. Control of Soft Rush would be good conservation practice and may be considered as mitigation to improve supporting habitat. Grasslands closer to the SPA will have a greater chance of being utilised by SPA birds with contiguous fields being of highest value.

Zone Bii between 2.5 and 7km from the SPA, is also certain to hold important habitats that are used by Golden Plovers and that are functionally-linked to the SPA. It would be advantageous if any Golden Plover feeding fields are identified and their environs are safeguarded from development. A zone of 400m around Golden Plover feeding fields should be sufficient to ascertain there will be no adverse impact on the integrity of the SPA within Zone Bii. The excellent research undertaken shows that 80% of visitors from within the borough travel from within 7km. It therefore follows that building new domestic dwellings within 7km of the SPA will result in an increase in visitor and dog walker disturbance. There may also be an increased risk of wild fires either deliberate (usually children) or inadvertent (discarded cigarettes).

We also support the broad principle in Policy HO3 of the revised spatial strategy, relocating new domestic development in zones away from the SPA, which will minimise impacts on the SPA.

Policy EN6 should make reference to the guidance note produced by West Yorkshire Ecology on small turbines (<50Kw), which gives guidance on levels of survey effort etc.

Referring to Section 6.5 in the Habitats Regulations Assessment, RSPB strongly supports the robust approach to mitigating effects from the additional pressures of development on the South Pennine Moors SPA and SAC. Such mitigation should also be regularly monitored which should be formally added to paragraph 6.5.1 in the HRA.

**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

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

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:**

**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:**

7 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.**