



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	Ms	
First Name	[REDACTED]	
Last Name	Freeman	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	The Theatres Trust	
Address Line 1	[REDACTED]	
Line 2	London	
Line 3		
Line 4		
Post Code	WC2H [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 26 March 2013

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	Cultural Attraction and Tourism	Paragraph		Policy	
---------	---------------------------------	-----------	--	--------	--

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.

We do not consider this document to be sound as it is not consistent with national policy for cultural infrastructure as set out in the National Planning Policy Framework item 156, due to its failure to set out strategic priorities to protect, enhance and develop the provision of health, security, community and cultural infrastructure and other local facilities across the district.

Also, for sustainable development, the document should first protect and enhance existing before building new. We would usually advise a general district-wide policy for this purpose to reflect item 70 in the National Planning Policy Framework (NPPF) on page 17 which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

Objective 10 is not reflected in any policy that we can find in this large document. Policy TR4 on transport and tourism does provide for improved access to cultural attractions, but does not address the NPPF's guidance in items 70 and 156 with regard to retention and enhancement of existing facilities. Paragraph 5.1.36 states that leisure and cultural facilities will be promoted and enhanced, particularly to improve the evening economy, but there is no policy that provides specific guidance for this aspiration.

The newly published National Planning Practice Guidance also recommends that a range of issues could be considered through the plan-making and decision-making processes including social and cultural wellbeing. Well-being is having a sense of satisfaction with life. Social and cultural wellbeing includes the un-measurable personal experiences that make us happy and content. Such experiences are intangible, not financially rewarding, and can either be active (sports) or passive (theatre). The provision of a variety of community infrastructure for tourism (cultural heritage) and town centre vitality (cultural facilities) etc are vital for their contribution to residents' and visitors' life satisfaction. The word 'wellbeing' is used throughout the document, but not in any policy, nor in the Glossary to explain its practical application in Bradford.

The document is unnecessarily long and although it does not undermine the soundness of the CS,

It obscures its key themes and entails repetition, especially in the policies for towns.

The policies for towns all contain the same phrase *associated community facilities* without explaining what these might be. It would be helpful if a description for the term 'community facilities' was added to the Glossary of Terms and we suggest, so that guidelines are clear and consistent, this succinct all-inclusive description which would obviate the need to provide examples: *community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.*

The term 'social infrastructure' is also used without any explanation.

Appendix 4 for Car Parking Standards does not include the sui generis category and therefore ignores Bradford's theatres.

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.

Introduce a policy to reflect Objective 10 to be consistent with the National Planning Policy Framework and the National Planning Practice Guidance along the lines of - The council will protect existing community, cultural and social facilities by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meet the need of the local population; or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on site.

Include a description for the term 'community facilities' in the Glossary - *community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.*

Include theatres in Appendix 4.

Reduce the length of the document to make it more concise and focused.

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: [Redacted] Freeman

Date: 26 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.

