

Core Strategy Development Plan Document

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

Publication Draft - Representation Form

Monday 17th February until Monday 31st March 2014

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.

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

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

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.

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

- **E-mail to:** ldf.consultation@bradford.gov.uk
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,
2nd 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 31st 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	Mr
First Name	[REDACTED]	
Last Name	Hardie	Yapp
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	Highways Agency	JMP Consultants Ltd
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	Leeds
Line 3	Leeds	
Line 4		
Post Code	LS11 [REDACTED]	LS1 [REDACTED]
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	

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	4.1, 5.3	Paragraph		Policy	BD1, BD2, HO3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	X	No	
4 (2). Sound	Yes	X	No	
4 (3). Complies with the Duty to co-operate	Yes	X	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.

Section C1 in Sub-Area Policy BD1 proposes the creation of 6,000 homes in South East Bradford together with associated community facilities and employment opportunities. The proposals include the development of the proposed Holme Wood Urban Extension and improved connections to the Strategic Road Network (SRN). Section C4 of Sub-Area Policy BD1 also proposes 5,500 new homes in South West Bradford during the plan period representing an increase of 1,000 homes compared with the figure given in the Further Engagement Draft consultation (October 2011-February 2012).

The same housing proposals are also set out in item E in Sub-Area Policy BD2; Table HO4 after paragraph 5.3.58 and item B in Policy HO3 after paragraph 5.3.64. The Agency's comments given below also apply to these items.

The Highways Agency recognises that the successful delivery of these proposals is in part dependent on the safe and efficient operation of the M606 motorway, its junction with the M62 motorway at Chain Bar (M62 Junction 26), and M62 Junction 27 at Gildersome where the A650 feeds traffic onto the SRN. The M606 and A650 routes to the M62 motorway will be expected to absorb traffic generated not only by housing growth in South East and South West Bradford, but also by housing and employment growth in Bradford city centre. In addition, proposed improvements to the local primary road network in the Shipley – Canal Road Corridor will create a more attractive route between Airedale, Shipley and the motorway network.

Traffic modelling work undertaken by the Agency indicates that improvement works will be required at M62 Junction 26 (Chain Bar) during the plan period. Works identified to be necessary at Junction 26 in the short to medium term in an Infrastructure Study commissioned by the Agency included alterations to road markings at the roundabout and upgrading of the M62 westbound diverge. In the longer term a

much more substantial scheme will be needed in order to prevent very long southbound queues on the M606. The Agency is committed to working with the Council to delivering the schemes necessary to support this level of development.

Section C1 of Sub-Area Policy BD1 does not specify the form of the improved connections between South East Bradford and the M62 motorway. It is understood that the proposal for a South East Bradford Link Road will provide a link from the city's outer ring road to the A650 Drighlington Bypass. This is likely to feed additional traffic onto the M62 via the A650 at Junction 27 (Gildersome). The Agency does have a Local Network Management Scheme (LNMS) for capacity improvements at both roundabouts at Junction 27 which will help to mitigate problems in the short to medium term.

For the longer term, the Agency's Infrastructure Study has indicated that, by the end of the plan period, there will be increased congestion on the M62 mainline between Junctions 25 and 28 (Tingley) taking up the capacity created by the recent Smart Motorway Scheme. The study also showed increasing congestion at Junctions 26 and 27. Traffic generated by Bradford's Core Strategy development proposals contributes to the overall growth of traffic and congestion on the M62 in West Yorkshire in the later years of the Core Strategy plan period. Recently, the Highways Agency has conducted a strategic analysis of future needs on the Strategic Road Network and, although not yet completed, this analysis is identifying locations where major enhancements to the SRN will be needed and the Highways Agency is working closely with all local planning authorities to develop a deliverable strategy that best supports the Local Plans

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.

Mitigation of the adverse impacts on the Strategic Road Network (SRN) of the Bradford Core Strategy Publication Draft proposals for housing development will need to take three forms – physical mitigation in the form of investment in increased highway capacity; reduction in the need to travel; and mode transfer to public transport achieved by the provision of new or improved rail and bus services.

Paragraph 5.2.16 of the Core Strategy Publication Draft refers to proposals for engagement between the Council and the Agency to address minimising of the impact of development proposals on the M606 Corridor. This is welcomed by the Agency.

The Infrastructure Schedule contained in the Local Infrastructure Plan lists only schemes on the local highway network and does not include any schemes on the SRN. As has been indicated earlier in this response, there will be a need for capacity improvements at M62 Junctions 26 and 27. Schemes have already been identified to address impacts at both junctions in the short to medium term. Reference is needed to these schemes in the Local Infrastructure Plan.

Policy TR1 in the Core Strategy Publication Draft provides an appropriate policy context for reducing the need for travel and that is welcomed.

Policy TR3 in the Core Strategy Publication Draft is satisfactory in that it sets out the mechanisms for

improving public transport. The Infrastructure Schedule in the Local Infrastructure Plan contains a raft of proposed public transport schemes. The proposals intended to improve public transport access to Bradford city centre and to improve connectivity between Bradford and Leeds and between Bradford and Huddersfield are of the most relevance. Dialogue is needed to establish the scale of mode shift and the benefit to the M606, M62 and M621 motorways of this investment in public transport.

If these matters can be brought to a conclusion that is satisfactory to the Agency, the proposals for housing development could be considered sound.

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 checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination
<input 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:

The Highways Agency does not wish to speak at the examination but would be happy to be present and respond to questions as would best help the Examiner.

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:

27/3/14

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	4.1	Paragraph		Policy	BD1, EC3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	X	No	
4 (2). Sound	Yes	X	No	
4 (3). Complies with the Duty to co-operate	Yes	X	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.

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Item D3 in Sub-Area Policy BD1 refers to "South Bradford including the M606 Corridor to be the location of choice for large scale industry, including storage and distribution". Item C2 in Policy EC3 refers to South East Bradford as one of the areas of search for green belt releases for high quality employment opportunities. The only quantification provided is in Policy BD3 where, in Section A, it refers to 100 hectares of additional employment land within the City of Bradford. Although without detailed quantification, it is not possible to make a completely accurate assessment of the potential impact of employment development on the operation of the M606 motorway and M62 Junctions 26 (Chain Bar) and 27 (Gildersome), it is accepted that there is sufficient information available to allow the Agency to form a judgement of the soundness of Policies BD1 and EC3.

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).

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Eventually, more detailed information will be needed on the scale of employment development along the M606 Corridor and elsewhere in South East Bradford in order that the Agency can assess the potential impact on operation of the M606 and M62 Junctions 26 and 27.

This will enable the Agency to develop enhancements to the Strategic Road Network best suited to support the Local Plan.

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.

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

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9. Signature:

[Redacted Signature]

Date:

27/3/14

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	5.2	Paragraph		Policy	TR1, TR2, TR3
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	X	No	
4 (2). Sound	Yes	X	No	
4 (3). Complies with the Duty to co-operate	Yes	X	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 principles underlying Transport Policies TR1, TR2 and TR3 are generally supported by the Agency. However, there is one particular issue that is of concern.

The Infrastructure Schedule in the Local Infrastructure Plan identifies as 'desirable' a high quality public transport route (tram train or NGT bus) between the M606 / Low Moor / Euroway, Bradford city centre and Shipley. Policy TR2 provides support for the provision of bus and rail park and ride facilities whereas the Infrastructure Schedule does not contain any detail on proposed park and ride sites.

The mode shift associated with implementation of a high quality public transport route supported by park and ride car parks can result in significant changes to travel patterns as motorists change their routes to access the park and ride car parks.

The Agency welcomes park and ride in principle but is concerned that, if a high quality public transport route is provided in combination with a park and ride facility in the M606 Corridor, there could be an adverse impact on the safe and efficient operation of the M606 motorway given the demands that are to be placed on it by traffic generated by housing and employment development proposals. The Highways Agency expects to work closely with the Council to manage and minimise such potential adverse effects during the design phase of the scheme

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.

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X

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

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The Highways Agency does not wish to speak at the examination but would be happy to be present and respond to questions as would best help the Examiner.

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9. Signature:

Date:

27/3/14

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" value="3.15"/>	Policy	<input type="text"/>
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4. Do you consider the Plan is:

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

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 Highways Agency supports in principle the strategic objectives supporting the spatial vision for Bradford District. In particular, support is given to the sentiments expressed in paragraphs 2, 3 and 9.

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).

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9. Signature:

[Redacted Signature]

Date:

27/3/14

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	4.1	Paragraph		Policy	BD1(F)
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	X	No	
4 (2). Sound	Yes	X	No	
4 (3). Complies with the Duty to co-operate	Yes	X	No	

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The Highways Agency supports in broad terms the policy principles for Transport contained in Section F of Sub Area Policy BD1. The emphasis on increasing the use of non-car modes, improvements to public transport in the Leeds-Bradford Corridor and investing in key locations on the highway network are particularly welcome.

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).

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9. Signature:

[Redacted Signature]

Date:

27/3/14

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.

3. To which part of the Plan does this representation relate?

Section	5.2	Paragraph		Policy	TR6
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	X	No	
4 (2). Sound	Yes	X	No	
4 (3). Complies with the Duty to co-operate	Yes	X	No	

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Transport Policy TR6 addresses freight transport. The principles contained in the policy are generally acceptable to the Highways Agency. The only concern is in relation to item B. The Agency's concerns about employment development in the M606 Corridor and South East Bradford have been detailed in the comments on proposed Policies BD1 and EC3. The issue is that the statement in item B does not make any reference to the constraints of highway capacity and safety.

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).

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9. Signature:

[Redacted Signature]

Date:

27/3/14

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

