City of Bradford Metropolitan District Council

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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)*
Title	**Mr**	
First Name	[redacted]	
Last Name	**Tiffany**	
Job Title (where relevant)	[redacted]	
Organisation (where relevant)	**Pudsey Pacers Running Club (Community & Voluntary Organisation)**	
Address Line 1	[redacted]	
Line 2	[redacted]	
Line 3	**Leeds**	
Line 4	**West Yorkshire**	
Post Code	**LS13** [redacted]	
Telephone Number	[redacted]	
Email Address	[redacted]	
Signature:	[redacted]	**Date:** 30th 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.

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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	Var.	Paragraph	Var.	Policy	Var.

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.

Pudsey Pacers Running Club (PPRC) has been engaged with the work of the Tong & Fulneck Valley Association and is in complete agreement with the representations made by that Association with respect to the challenges made to the Local Plan's Legal Compliance, Duty to cooperate, and Soundness.

Beyond this, Pudsey Pacers RC draws particular attention to a number of issues:

Duty to co-operate

With upwards of 200 members resident in the Leeds and Bradford conurbations (who are all and equally sensitive to the amenity value of the Tong / Fulneck Valley) we are concerned that there has been a failure to co-operate with Leeds MC such that the proposed loss of amenity has not been subject to a dialogue between the respective authorities nor the residents therein. PPRC is further concerned that it received no contact from Bradford MC despite the popular knowledge that it is a key local stakeholder in community matters with a long history of involvement in the promotion of recreation, community cohesion, public health and charity fundraising through participation in sport and activities to protect the local environment and its ecology. This constitutes a clear breach of the duty of co-operate.

Soundness

PPRC is concerned that issues of 'infrastructure requirements' (in line with the proposed development) are narrowly conceived. PPRC believes access to local green space (including that designated green belt) should be accorded the same status as other infrastructure requirements, such as schooling. In effect, a larger population will have access to a lesser resource. Currently the area, and particularly its woodlands, footpaths and bridleways are essential to the physical, emotional and mental health of the existing population. The rationale for reducing this resource and, at the same time, increasing the local population cannot be considered reasonable by any criteria. If anything, the current status needs strengthening, not eroding and this is all the more-important when one considers the importance of

preserving this area for the benefit of future generations.

PPRC further believes that community cohesion could be weakened given the potential of the proposed extension becoming a 'motorway settlement'. This is likely given proximity to transport networks (and proposed new ones) and would encourage migration to the area rather than meeting the housing needs of the local population. The housing and homelessness problems of local people could, in effect, be worsened.

Our members are in agreement that the area already suffers from extraordinary levels of traffic congestion and that the proposed development will only exacerbate this. Members who also cycle on the minor roads in the area are deeply concerned that their enjoyment and safety will be put at risk by the increased traffic volumes that will inevitably follow. This will also have a negative effect on local people's health and well-being. This said, the fact that our membership comes from a wider geographical area and are motivated to travel to use the area often upwards of twice a week shows that the area acts as a resource for people often from a considerable distance away. Surveys of members' motivations for choosing our club over others points to its proximity to this area of green space and an appreciation of its wealth of footpaths. The prospect of this oasis disappearing and the Leeds & Bradford areas forming a single conurbation is deeply concerning and constitutes a disregard of legislation that specifically states that Green Belt status is there to ensure such a merger (coalescence) doesn't happen. Furthermore, the National Planning Policy Framework stipulates that existing protection for Green Belt must be ensured in light of any proposed development and separation with other conurbations assured.

The diversity of our membership has meant it possible to access a wide range of perspectives, from those of education and health professionals, and transport and planning experts. There is a broad consensus that this plan is lacking in its detailed commitment to the legal, dutiful and rational dimensions of it.

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.

PPRC contends that the plan is flawed and further and wider stakeholder engagement is needed to validate the principle of community participation in which those who will be affected by decisions have a right to be involved in the making of those decisions. It is hoped that the points made here can be taken into account in this wider context.

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, 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:

More robust representation from community and voluntary organisations is necessary to ensure commitments made to community involvement and participation in decision-making are robust and valid.

***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]	**Date:**	30th March 2014

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

[redacted]