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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	Mr
First Name	████████	████████
Last Name	Tunbridge	Wood
Job Title <small>(where relevant)</small>	████████	████████
Organisation <small>(where relevant)</small>	Yorkshire Greenspace Alliance	CPRE West Yorkshire
Address Line 1		████████
Line 2		████████
Line 3		Sheffield
Line 4		
Post Code		S10 ██████
Telephone Number		
Email Address		████████
Signature:	<input type="text"/>	Date: <input type="text"/>

#### 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	<input type="text"/>	Paragraph	<input type="text"/>	Policy	<input type="text" value="SC3"/>
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**4. Do you consider the Plan is:**

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

Strategic Core Policy 3 (SC3): Working Together

Naturally we support collaboration with neighbouring authorities and with other agencies. However, this policy is worded in a planning/legal jargon that effectively excludes any party (for example, neighbourhoods wishing to pursue Neighbourhood Plans) that does not understand that terminology. In particular:

*"2. Address low and high housing demand"*: there is no indication of what the local or strategic implications of low and high housing demand are, for example whether different policies with the Plan need to act differently upon different places, or different types of settlements within the hierarchy.

*"4.Promote polycentric networks of different places with complementary roles, based on their own strengths and characteristics"*: again there is no sense of what this means in practice.

*"B. Effective discharge of the duty to cooperate in order to:*

*"1.Address strategic cross boundary issues"*: Clear, tangible examples would help us to understand this, especially given that paras 3.49 to 3.55 are also very technical and convoluted in language.

*"2.Align spatial development and mitigation of impacts of development"*: Again, practical examples would be illuminating.

Stakeholders will be hindered in understanding the implications of the policy, and therefore the policy as it stands cannot be considered justified or effective.

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.

Each element of the policy should be supported by clear, non-jargonistic examples of its purpose and the role of partners, communities and neighbouring authorities.

*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:

To further represent the views and concerns of the Yorkshire Greenspace Alliance in the light of all parties' consultation responses and the questions posed by the Inspector.

*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:

26 March 2014