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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	[REDACTED]	[REDACTED]
Last Name	Tunbridge	Wood
Job Title (where relevant)	[REDACTED]	[REDACTED]
Organisation (where relevant)	Yorkshire Greenspace Alliance	CPRE West Yorkshire
Address Line 1		[REDACTED]
Line 2		[REDACTED]
Line 3		Sheffield
Line 4		
Post Code		S10 [REDACTED]
Telephone Number		
Email Address		[REDACTED]
Signature:	[REDACTED]	Date: [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.

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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="SC4"/>
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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.

Settlement Hierarchy

SC4 Principal Towns (C) states: "Biodiversity, landscape and heritage assets define the character and setting of the Districts principal towns."

We wholeheartedly agree, but this statement should not only apply to principal towns: in our view it applies to every settlement in the district. Indeed, comprehensive evidence of how these characteristics define each settlement should fully and clearly inform the choices of the types and locations of new developments in a way that complements and counter-balances the SHLAA. That is to say, the SHLAA's starting point is the availability of land, with filters and commentary provided according to the constraints upon developing each site; but the evidence and evaluation of those constraints comes from disparate sources which lack the degree of integration with the Core Strategy that the SHLAA enjoys. Better evidence would enable a site allocations plan that was more sensitive, in that a site would not simply be allocated for a particular use and density of use but could also identify what its positive contribution to the settlement's character would be.

SC4 Local Service Centres and Rural Areas: Yorkshire Greenspace Alliance members are especially concerned about the implications of the Plan for settlements along the A65 corridor (Menston, Burley, Addingham & Ilkley) and the Tong Valley. All these proposals mean the loss of Green Belt land that risks the merging of villages and subsequent loss of settlement character and community identity, made worse by the generic designs and layouts of most new developments. They also pay no attention to the lack of infrastructure (both transport & social) in these areas which means the extra residents these proposals will generate will not be easily absorbed into existing communities.

Consequently we consider SC4 not to be justified by robust evidence.

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.

The Plan requires much more comprehensive, robust evidence about:

- the role of biodiversity, landscape and heritage assets in defining the character of settlements;
- the role of new development in supporting the character and function of settlements on a settlement-by-settlement basis, broken down by development type, tenure, design and density;
- the risks to settlement character presented by development pressures;
- a clear rationale for any proposed Green Belt changes based on their measurable, positive contribution to the character and function of settlements, that can be fully scrutinised by affected communities.

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:	<input type="text"/>	Date:	26 March 2014
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