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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]	
Last Name	Tunbridge	Wood
Job Title (where relevant)	[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		andrew@strideworks.org.uk
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="SC5"/>
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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 5 (SC5): Location of Development

Items 1 to 4 could describe what we might call 'concentric circles of search' for sites that would enable the intended distribution of development to be achieved:

1. Firstly looking for brownfield sites within settlements – which we support and wish to see strengthened. We welcome Bradford’s historical success in recycling previously developed land, but we strongly caution against using this track record as evidence that such a rate can continue to be delivered without clear policies and mechanisms to focus new development on brownfield sites. There are known problems with bringing brownfield sites forward due to issues of ownership, land assembly and site preparation, and we wish to see mechanisms to overcome these obstacles on sites that would be well-suited to achieving spatial objectives. However, there is also a problem where brownfield sites and greenfield sites may be part of the same developer’s portfolio, but where they will simply prefer to develop the greenfield site from a financial perspective. In these cases allocating and granting permission on brownfield sites may still see low implementation compared to greenfield sites, so we question the degree to which the 'brownfield first' approach has a viable implementation mechanism. Therefore the approach is not effective, because it cannot be delivered by the rest of the Plan.

2. Secondly looking for greenfield sites within settlements - which may be problematic because it might starve settlements of green infrastructure within them. This also includes sites that are on the edges of settlements but are not in the Green Belt, and looking at some of the SHLAA maps there is a tendency for these sites to be behind the existing built form of a town or village when seen from the main roads. If these sites are built with generic suburban densities and layouts then they will tend to have a disproportionately suburbanising effect on the character of the settlement compared to the number of units they deliver. The crucial point here is that greenfield sites within and on the edge of settlements need to be considered alongside the existing mix of housing types,

greenspace provision and the range of amenities. Whilst we would always caution against greenfield development and would favour brownfield sites, within and around settlements it is often the case that distinctions between greenfield and brownfield are blurred, and what really matters is the character and function of the settlement. It is likely that a combination of much higher density developments, that more strongly mirror traditional types of development, and retaining more land for public spaces and green infrastructure, would be a better solution for many settlements, but without the additional evidence we have already suggested (our response to Policy SC4) appropriate decisions about the location *and type* of development cannot be made. Therefore this aspect of the approach is not positively prepared, because it will produce results not consistent with achieving sustainable development.

3. Thirdly looking for sites where the Green Belt can be 'peeled back' to create development opportunities on the edges of settlements. Green Belt boundaries are, or should be, drawn where there is a natural, defensible edge between built form and countryside, and breaching those edges could have a significant impact on settlement character. Green Belt is **not** a long-term area of search for development land, and strategically the only case for Green Belt changes is where they could produce a better result for settlement character and sustainability than is currently there. This can only be considered through site-by-site, settlement-by-settlement analysis, that is not within the scope of the current SHLAA. Consequently we must object to the proposed Green Belt changes, as they are likely to be detrimental to sustainable development and the character of settlements, as there is insufficient evidence to the contrary. Therefore this aspect of the approach is not positively prepared, because it will produce results not consistent with achieving sustainable development.

4. Fourthly looking for sites where larger scale development in the countryside could be accepted and made sustainable. Again, the biggest problem here is that the current proposals are too vague:

- a) Holme Wood is the only 'urban extension' that is proposed, but the scale of growth being considered for Queensbury, Thornton, Steeton and Silsden may also amount to the same thing. It is not apparent what the proposed boundaries of an urban extension at Holme Wood might be, but it is likely that the development would have a high impact on the character of settlements and adjacent countryside.
- b) It is very difficult to take a constructive position on such proposals if they're not properly marked on a map - which is why the proposed urban extension at Bassingthorpe Farm, Rotherham, was included in their Draft Core Strategy as a strategic growth location, rather than being deferred to the site allocations plan.
- c) Additionally, communities' resistance to large-scale housing growth is reinforced by seeing how places such as Steeton and Silsden have already been spoiled by generic, suburban housing estates, and it would be tragic to see Thornton, Queensbury and Holme Wood go the same way. All big developments must be rigorously masterplanned with full community involvement, and should only be entertained if they're exemplary in terms of their design, energy performance, green infrastructure and other sustainability credentials.

Therefore the approach to locating larger scale development is not justified, because stakeholders cannot adequately assess the relative merits of the proposed locations compared to alternatives.

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.

In addition to our comments about further evidence needed for Policy SC4, we consider that the Plan should:

- Clearly express (if needs by reference to other policies) how previously developed land will be prioritised in practice, through implementation mechanisms, in particular by using the phased release of sites to focus development on sites that best deliver spatial objectives;
- Be supported by robust evidence of how the location *and type* of development provided in each location will benefit the local community in terms of amenity, settlement function and character, and how the type of development permitted in different locations will be tailored to to the community's needs;
- Establish a rationale for any Green Belt changes that is predicated on enhancing locations, not on peeling back the edges of settlements as areas of search for development land;
- Only make proposals for larger scale developments based on site-specific evidence, for example by putting forward strategic growth locations identified in the Core Strategy and not deferred to the Site Allocations 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.

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