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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="SC7"/>
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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.

Policy SC7 Green Belt

Notwithstanding our comments on other policies, which would have a bearing on the extent to which Green Belt loss takes place, we would make the following comments:

- a) Any Green Belt review should focus on cementing the long-term function of the Green Belt, both in defining settlement form and providing a defensible resource for green infrastructure - not just enabling release of land for development. This should be explicit in the policy.
- b) SC7(C) is inadequate, because it would protect the Green Belt only just beyond the Plan Period (if the plan is 2014 to 2030 and is adopted by 2016 then potentially the Green Belt could be reviewed in 2031). This reinforces our concern that the Draft Plan is built on a fundamentally unsustainable premise - that meeting housing requirements up to 2030 will use up all the land that can be released *including* through a Green Belt review, and would render a further unpeeling of the Green Belt after 2030 inevitable. If the current set of Green Belt deletions are proposed on the basis that these could be developed without damaging the purposes of the Green Belt, then by default any future deletions in future plan periods would be more damaging. Thus the Plan sets Bradford District up for much greater damage to the countryside and to the character and function of settlements in the longer term.

Consequently we consider this policy is not positively prepared, because:

- It starts from a preconceived position that deleting land from the Green Belt is a way to deliver housing land supply, which we consider to be insufficiently analysed;
- It creates a longer term pressure for further Green Belt changes post 2030, whilst indirectly accepting that these would be more damaging.

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 limits to development capacity outside of settlements, both within this Plan period and beyond, should be reflected in a reduced housing land requirement for the Plan period (policies HO1 and HO2).

Changes to the Green Belt should be considered and consulted upon through the Core Strategy and not deferred to the Site Allocations Plan, because they affect the strategic pattern of development and the shape of settlements and their surrounding countryside, not just localised land supply.

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