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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	Ms	
First Name	[REDACTED]	
Last Name	Bryden	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	Bingley	
Line 3		
Line 4		
Post Code	BD16 [REDACTED]	
Telephone Number	[REDACTED]	
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	3	Paragraph		Policy	SC8
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	N
4 (2). Sound	Yes		No	N
4 (3). Complies with the Duty to co-operate	Yes	Y	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.

The Core Strategy does include a range of environmental policies and some environmental elements of other policies, but it would still risk impacts on sites of European importance for biodiversity. As the Core Strategy does not fully mitigate the impacts there is a need to show over-riding national need and adequate compensation. The Bradford Habitat Regulations Assessment, Feb 2014 concludes that the housing development proposed in Bradford is not free from potentially significant adverse effects on the North and South Pennine Moors SAC and SPA. As such it is not compliant with the Conservation of Species and Habitats Regulations 2010 and NPPF paragraph 119.

The Core Strategy acknowledges this problem in paragraphs 3.104-3.112 and proposes SC8 in mitigation. SC8 makes a good attempt to minimise the adverse impact of major housing development in the District. It fails the test of Soundness, however, because the impacts can be predicted with reasonably high confidence, but the mitigation and compensation cannot necessarily be delivered. Despite the aspirations in the Core Strategy, measures are not in place to mitigate and compensate for the impacts that are occurring at present and are expected to increase in future due to increased housing development. Mechanisms are described in 3.120 to 3.123, but there is no time scale, no certainty of adequate funding and no redress if the measures are not successful. There is a risk that the SAC and SPA sites may not return to Favourable Condition. Most of the compensatory provision of natural greenspace required, possibly all of it, will be outside the land identified within the SHLAA for potential housing. Unless green infrastructure and specific natural greenspace proposals are developed in advance, it is unlikely that adequate provision can be made to mitigate the impacts. The green corridors shown on the Key Diagram – Location Strategy are welcome, as is the creation of a linear park along Bradford Beck and the Leeds Bradford country park, but they are not enough on their own.

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.

There should be a presumption against any further development within Zone B 400 m – 7 km from the SAC/SPA until sufficient provision of natural greenspace has been made of sufficient quality and in appropriate locations to meet the increasing demand for informal recreation and to avoid any increase in direct and indirect impacts on protected upland areas.

Otherwise the likelihood is that a) provision of this mitigation will lag the impact on the SAC/SPA by many years and b) insufficient resources may be available to deliver the provisions. There is mention of ecological network plans in paragraph 5.4.98, but it is not clear as to their status, whether they will be incorporated into Development Plan Documents for planning areas within the District and whether they are a recognition solely of the current situation, or include targets sufficient to offset impacts on the SAC/SPA.

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:

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:

31/03/2014