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507

30th MARCH 2014

Jacobs West 2nd Floor

Bradford,

RE
Consultation Core Strategy Draft

BD13

Dear Sir,

Please find my comments below for the above consultation using the full size document.

Page 56 para 3.100 - States there is a need to access under used and vacant land not currently allocated for development. This statement needs to be altered to in terms of helping to protect greenfield land and green belt land giving these designated sites to fulfil their roles protecting urban sprawl.

Para 3.101 GREEN BELT - Agree with this paragraph Strategic Policy 7 (S67): GREEN BELTS: - I support A) of the above policy in that Green Belt land is left to support the 5 key principles as set out in the National Planning Policy Framework as follows

- 1) Check Urban Sprawl - 2) prevent neighbouring towns merging - 3) assist in safeguarding countryside
- 4) preserve setting and special character existing towns -
- 5) assist urban regeneration encouraging recycle district (and other urban land)

(2)

and as stated in this policy keeping settlements separate concerning the countryside

I do not agree with releasing the countryside. Green Belt land to deliver long term housing. Part B of this policy states it would release Green Belt land in locations that would undermine the strategic function of the Green Belt with in the Leeds Region, most towns need stopping from sprawling especially Bradford on its perimeter.

B) States also that Green Belt will be assessed against purposes of keeping it in as set out in NPPF and be done under consultation -- I agree with this that residents should have their views taken into account as they have no vote here..

C) States that the revised Green Belt has to provide long term protection for 15 years -- and should not be nibbled a way as it has in the past. I propose that the brown field and unused sites be pushed forward for development before any Green Belt boundaries are assessed so as to keep the Green Belt changes to a minimum.

(3)

Also (1) states that any revision to Green Belt boundaries in the District will be ^{to} meet development needs to allow sustainable development to be delivered. Sustainable development in the Green Belt does not mean development at any cost as quoted in the National Planning Policy Framework. So I disagree that it should be even contemplated to review the Green Belt just because the position of the land is sustainable, but it fulfill its vital role and important role of protecting urban sprawl and keeping settlements from joining.

My comments are ~~not~~ also flowing into para 3.10.2. Just because you want to review it now the Green Belt so that it will remain unchanged to 2030 does not mean it has to be in need of change.

I make to Policy SCS (do not agree with point 2+3) Agree with point 1 re-use of re-use of deliverable sites. Greenfield and Brown Belt land should only used on lowest grade land first, but this does not mean in terms of sustainability does not mean development at any cost. It is also the developer who needs

prove Sustainability. (11)

Agree with Para 3.52 minimise both the need to travel and to minimise use of greenfield sites.

Agree with 3.84 to retain valuable habitats and open spaces.

Policy H103 states Sustainability as a Growth Area and have no issue in taking some of the development which would otherwise

Para 5.3.50 Land Supply (SHEA) I don't agree that a split between greenfield and brownfield and the amount of greenfield be used to a greater extent to the brown field first as a priority.

5.3.57 States to minimise Green Belt use what does this mean then maximise PDL land. Also Policy H103 states to fully utilise all deliverable and developable PDL identified.

Agree with H103 part of the need to meet the targets of development on brownfield land as set in this document paras 5.3.73 also refer to this point - 5.3.82 also states this point as part of WPP also this para states usually brownfield land is concentrated in urban areas - so not necessarily

on the greenfields and ^⑤Greenbelt.

S-3-86 States not enough brownfield to meet targets of housing. This is not the attitude we take now but to my surprise it using as much recycling of land as possible.

Policy Note Agree with achieving at least 50% housing on brownfield and it is possible more needs to be achieved. This figure is below compared to other councils.

S-3-91 States that a sites status be brownfield or greenfield be the only factor in determination of use but this has to be a large important part of the determination of whether to use the site or protect it.

Para S-3-43 states NPPF suggests sustainable development is at the heart of the growth and economic transformation - No it is NOT as the NPPF states sustainability does not mean developed at any cost.

To round up all of my comments I support the recycling of derelict and brownfield land and a higher percentage should be aimed for on a whole in the District. Greenfield land should be left as a last resort and only

low grade land ^(b) ever considered. Green Belt land should not be used and left to fulfil it's vital role as set out earlier in this letter and therefore Green Belt reviews should be an absolute minimum for the reasons above. They should be set and a test put against any changes proposed and a very rigorous check made to safeguard the area in question. As previously stated in this letter Sustainable development DOES NOT MEAN DEVELOPMENT AT ANY COST.

As for the volume of houses proposed for the area to put 1,100 in Queensbury alone will put an almost impossible strain on roads, schools, doctors, infrastructure. With each house will be average of four residents and two cars. Halifax will be joining to Bradford at that rate and there will be urban sprawl indeed. Donholme and Thornhill would be better located. You are not with Queensbury able to put a pit into a half pit pit.

Yours Sincerely

