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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	Mrs	
First Name	[REDACTED]	
Last Name	Dearing	
Job Title <small>(where relevant)</small>	Conservation Officer (Planning)	
Organisation <small>(where relevant)</small>	Yorkshire Wildlife Trust	
Address Line 1	[REDACTED]	
Line 2	York	
Line 3		
Line 4		
Post Code	YO24 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 31/03/14

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	Appendix 10	Paragraph	SO 15	Policy	
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (2). Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

Consistency

Strategic Objective 15 is currently not consistent with the Spatial Vision (set out in 3.15) or the NPPF (paragraph 109) as there is no commitment to try to enhance biodiversity assets but just to manage and safeguard what is already there.

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.

To increase the likelihood of the Spatial Vision being achieved and to ensure consistency with the NPPF the text for Strategic Objective 15 should be changed from 'safeguard and manage...' to 'safeguard, manage and, where possible, enhance...'

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:

31/3/14

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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	Appendix 11	Paragraph		Policy	
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (2). Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

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Unjustified

The wording relating to BAP habitats is unclear and seems to suggest that the only important habitats in Bradford are Hedgerows, Rivers and Upland Oak Wood which is clearly not the case as evidenced in section 5.4 and Appendix 12.

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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 text should be changed to: 'Important habitats are defined as **local BAP habitats (set out in bold capitals in the table below)** and **UK BAP habitats that occur in Bradford**. Full descriptions of the UK BAP habitats are available on the UK BAP priority habitats website. Important habitats also include in-bye grassland, which is a specific habitat associated with the moorland fringes of the uplands.'

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.

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✓

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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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	SC5
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4. Do you consider the Plan is:

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

Consistency

Policy EN2 should also be taken into account when allocating sites to ensure that land with the least environmental value is allocated, as highlighted within the NPPF (paragraph 110).

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.

Policy SC5 should be changed to read 'In accordance with the rest of the Strategic Core Policies, and with Policies HO2, HO3, HO4, HO6, HO7, EN2 and EC3, and after determining the broad distribution of development between the District's settlements, the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs'

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.

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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	SC6
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4. Do you consider the Plan is:

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

We support this policy and are pleased to see that further work will be carried out on Green Infrastructure within the other Local Plan documents. This should include mapping of Green Infrastructure to give further guidance on priority areas for enhancements in line with the NPPF (Paragraph 114).

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).

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination
<input type="checkbox"/>	Yes, I wish to participate at the oral examination

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3. To which part of the Plan does this representation relate?

Section	5.4	Paragraph		Policy	EN2
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4. Do you consider the Plan is:

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

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We are very supportive of this policy in the main and we are pleased to see that it has been expanded to include habitats outside designated areas and enhancements. However we would like to see a small amendment to section C to reflect the mitigation hierarchy within the NPPF (paragraph 118). We would also recommend that the locally, regionally and nationally important components of the habitat networks in Bradford are mapped in a future Local Plan document to give further guidance on priorities for enhancements and areas at risk from fragmentation in line with the NPPF (paragraph 117).

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.

Section C point 3 should be altered to read: *'The extent to which appropriate measures to avoid, mitigate or, as a last resort, compensate any potentially harmful impacts can be identified and carried out'*

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9. Signature:

[Redacted Signature]

Date:

31/3/14