

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

The Council are seeking comments on the Proposed Main Modifications to the Core Strategy, following the Examination in Public in March 2015. The changes are proposed by the Council to address issues of legal compliance and soundness and we can only accept representations on these matters.

Comments on the Proposed Main Modifications Schedule are invited from **Wednesday 25th November 2015 until Wednesday 20th January 2016.**

REPRESENTATIONS MUST ONLY RELATE TO THE PROPOSED MAIN MODIFICATIONS.

You can access the Core Strategy documents online and additional copies of this form from our website: www.bradford.gov.uk/planningpolicy then 'Core Strategy Proposed Main Modifications', or you may request copies by:

- Emailing us at: planning.policy@bradford.gov.uk
- Phoning us on: (01274) 433679

Completed representation forms must be returned to Development Plans, by the deadline below, by either:

- **E-mail to:** planning.policy@bradford.gov.uk
- **Post to:** Core Strategy - Proposed Main Modifications
Development Plans Group
City of Bradford Metropolitan District Council
2nd Floor South - Jacobs Well
Nelson Street
Bradford
BD1 5RW

**ALL COMMENTS MUST BE MADE IN WRITING AND SHOULD BE RECEIVED
BY THE DEVELOPMENT PLAN GROUP AT EITHER OF THE ABOVE ADDRESSES
NO LATER THAN 4PM ON WEDNESDAY 20TH JANUARY 2016.**

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 A: PERSONAL DETAILS

* If an agent has been appointed, please complete only the Title, Name and Organisation in box 1 below and complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title		
First Name		
Last Name		
Job Title (where relevant to this representation)		
Organisation (where relevant to this representation)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address		
Signature:		Date:

3. Please let us know if you wish to be notified of the following:

The publication of the Inspector's Report?	Yes		No	
The adoption of the Core Strategy?	Yes		No	

Are you attaching any additional sheets / documents that relate to this representation?	Yes		No	
	No of sheets / documents submitted :			

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.
(Additional Part B forms can be downloaded from the web page)

4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM15

5. Do support or object the proposed main modification?

Support

Object

X

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

X

8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

NO

Effective

NO

Consistent with National Planning Policy (the NPPF)

NO

9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to the proposed main modifications).

MM15 Both the South Pennines and the North Pennines HRAs impact Wharfedale and the 2.5km zones overlap from Addingham to Ben Rhydding where the valley widens. The whole of the Wharfedale area of Bradford is within the 12.5 km zone. Outside the built up areas, the HRA closely coincides with green belt.

The HRA legislation protects directly the areas of moorland from development in adjacent areas and further seeks to protect the SPAs from the pressure of additional usage by the increased population in the surrounding area. Building more homes will increase the population.

Stating that the HRA has been taken into account at the same time as *increasing* the housing numbers in Wharfedale more than suggests that the HRA has not been taken at all seriously. Further, the increase in population will mean additional infrastructure to accommodate people but no space has yet been allocated for new schools, which will mean still further encroachments into the 2.5km zones. Reflecting

the HRA provisions adequately would result in a *decrease* in housing numbers in Wharfedale. The HRA is a constraint to development.

Green belt which is also in HRA Zones A and B should be doubly protected from development. There is still insufficient knowledge about bird and wild animal migration patterns (much of it at night) in Wharfedale

Green belt which is on flood plains should also be doubly protected from development. In Wharfedale the flood plains (which need reviewing) are also in HRA Zones B and C.

HRA Zone A and B flooding due to run-off needs analysis. This flooding leads to landslides on steep ground, closes roads due to standing water, damages cultivated ground, including improved grassland, damages infrastructure and causes ice on often steep residential roads which have no priority for gritting.

The identification of areas of high quality natural greenspace is required, to mitigate increased recreation on the moors. It will not do this unless the greenspace is fully accessible ie NOT farmland and NOT recreation grounds. This can only be provided by even further encroachment into greenbelt. There is no indication as to how these areas will be acquired or managed.

10. Please set out what changes you consider necessary to make the proposed main modification legally compliant or sound, having regard to the test you have identified at Q7 above.

You need to say why this change will make the proposed main modification 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 application of the HRA Zones should be seriously applied to Wharfedale and the housing numbers reviewed accordingly.

11. Signature:

Kidman

Date:

16.01.16

Thank you for taking the time to complete this Representation Form.