PLANNING SERVICE

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19 JAN 2016



19 January 2016

Development Plans Group Core Strategy Proposed Main Modifications City of Bradford Metropolitan Council Second Floor South Jacobs Well Nelson Street Bradford BD15RW

Dear Sirs

Re: Local Plans for Bradford -Representations on proposed main modifications Nov 2015

lenclose my Representations.

I note that Part B has to be completed in respect of each representation and I have, therefore, 12 separate Part B's but as my Representations apply to each Part B (I have not attached separate copies to each Part B to reduce paper).

I should also point out that I found it extremely difficult as a lay person to follow the modifications.

I attended at the Keighley Town Hall to view and if necessary obtain copies of policies SC1 to SC8. The Assistant I spoke to was unable to find them on the website and she was unable to locate hard copies for me to view.

It appeared to me that there was a lack of training and information provided to those who were tasked with dealing with enquiries from the general public.

No doubt, you will consider this and take action to ensure appropriate training and guidance is put in place.

Yours sincerely
Shaw

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

1. YOUR DETAILS\*

MR

SHAW

Not Relievano

Eor	Office Use	enfy:	
Date			
Ref	<u>.</u>		

2. AGENT DETAILS (if applicable)

#### PART A: PERSONAL DETAILS

Title

**First Name** 

**Last Name** 

representation)

Organisation

(where relevant to this

Job Title

\* 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.

representation?	No of shee	s submitted :	3	
Are you attaching any additional sheets / documents that relate to this	Yes		No	
The adoption of the Core Strategy?	Yes		No	
The publication of the Inspector's Report	? Yes		No	
3. Please let us know if you wish to be notifi	ed of the follow	ing:		
Signature:		Date:	19	.87. 2016
Email Address				
Telephone Number				
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Line 4				
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Address Line 1				

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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.

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11. Signature:

Date:

19.1.2016

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

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#### REPRESENTATIONS TO PROPOSED MAIN MODIFICATIONS

- 1. These Representations apply to Main Modification Numbers :- MM2, MM4, MM7, MM8, MM9, MM9, MM11, MM12, MM18, MM51, MM52, MM84, MM88
- 2. I believe the Modifications are unsound as they re-categorise Burley in Wharfedale and Menston as" local growth centres" rather than the original category of "local service centres".
- 2.1 believe that they were correctly designated within the original policy document as local service centres and rural areas as that reflects their current location and status.
- 2.2 I do not believe that the limited evidence provided justifies those changes.
- 2.3 The assertions in the various modifications that they are sustainable does not reflect the available infrastructure in road or rail both of which are overcrowded. I experience major congestion in travelling to either Leeds or Bradford throughout the day and especially at Peak Times.
- 2.4 The objectives in the Policies do not refer to any road or rail studies that have been carried out and merely have "aspirational" plans to improve transport links. This is unrealistic.
- 2.5 There does not appear to be any evidence supporting the fact that properties to be developed in Burley in Wharfedale or Menston would support the "Bradford Community". It is my experience that the majority of people living in those areas actually travel into and work in Leeds. As a lay person I do not have resources to provide detailed studies or evidence of supporting that but certainly travelling on trains into Leeds for meetings at peak times would support the fact that both the rail and road network into Leeds is the subject of major congestion.
- 2.6 I believe that the change the hierarchy is unsound because it does not support higher order settlements in Bradford. They do not and will not serve Bradford to a substantial degree.
- 3. The redesignation of Burley in Wharfedale and Menston as local growth centres runs contrary to the assertion that their attraction is that they are developed now and surrounded by Green Belt Conservation Areas. The plan to take substantial areas of Burley in Wharfedale out of the Green Belt appears to me to be an unsound judgment and contrary to Policy SC4 where the aim is to enhance the settlements and landscape, including the diversity and character of the area.



- 3.1 The proposal for the redesignation and the taking areas of Green Belt for the development does not appear to have considered the environmental impact. There does not appear to be any evidence that I have been able to locate from the Environmental Agency or Rivers Authority to support this. The increased flooding risk not only for the areas of Ilkley and Burley but also those further down the River Wharfe, namely Otley and Tadcaster does not appear to be the subject of evidence.
- I believe the modifications are unsound because they fail to take into account the increased flooding risks and the impact of that on the local communities.
- 3.3 The fields between Ilkley Moor and the River Wharfe are currently flooded or saturated after recent heavy rain and act like a "sponge" to retain water that would otherwise flow straight into the River.
- 4. I believe that the judgments are unsound in that "The guidance on the Planning Inspectorate Practice" is such that any main modifications to the Core Plan after submission should only be considered:-
  - 4.1.1 If they are necessary to make the plan sound or legally compliant or
  - 4.1.2 If the Local Planning Inspector has formally requested modifications to be recommended.
- The Habitat Reports seem to have been recommended by the Inspector but the other plans seemed to have been as a result of policy change by the Council. The modifications do not appear to be matters which should be the subject of main modifications at this stage in the process.
- I also believe that Menston Station and Burley in Wharfedale Stations are not suitable for wheelchair access and accessibility for wheelchair users does not appear to have been considered within the report, nor does the fact that the platforms at those stations cannot be extended.
- 6. It appears that whilst many of the main modifications in relation to "waste management" refer to working collaboratively with other neighbouring authorities and statutory bodies but the main modifications in respect of the vision and core developments do not.
- The lieve that the objectives used to appraise the proposed policy changes are unsound in that they are flawed as they do not refer to the flood risk impacts of the developments, nor do

they consider where those living in developments such as Burley in Wharfedale and Menston will work, and so do not directly service the needs of the Bradford Area.

- The Policy of larger sites being developed as set out in Main Modification 18 is not consistent with the character of the villages of Burley in Wharfedale and Menston.
- 9. A significant contribution to the provision of housing needs from the Green Belt is I believe against national policy,
- 10. I believe that the original designation of Burley in Wharfedale and Menston should be reverted and alternative sites located within the core Bradford Area where those working in Bradford would wish to live and where distances travelled to places of work, schools, and leisure facilities would be reduced with minimal impact on Green Belt areas and reduced flooding risk.



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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.

Please see representations and proposair available to MM2

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Date:

19.1.2016

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19.1.2016

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

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

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

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

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Director (4)

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

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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.

Please see representations and proposari actained & MM2

11. Signature:

Date:

19.1.201

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