

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.

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

For Office Use only:	
Date	
Ref	

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	Reverend Canon		
First Name	[REDACTED]		
Last Name	Dey		
Job Title (where relevant to this representation)	Chairperson		
Organisation (where relevant to this representation)	Tong Fulneck Valley Association		
Address Line 1	[REDACTED]		
Line 2	[REDACTED]		
Line 3	Bradford		
Line 4			
Post Code	BD9 [REDACTED]		
Telephone Number	[REDACTED]		
Email Address	[REDACTED]		
Signature:	[REDACTED]	Date:	20.1.2016

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

The publication of the Inspector's Report?	Yes	Yes	No	
The adoption of the Core Strategy?	Yes	Yes	No	
Are you attaching any additional sheets / documents that relate to this representation?	Yes	No	No	
	No of sheets / documents submitted :			

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

For Office Use only:	
Date	
Ref	

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:

MM17 MM18

5. Do support or object the proposed main modification?

Support

Object

Object

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

Yes

No

No

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

Yes

No – 'unsound'

No - unsound

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

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).

It is disturbing to note that despite plans to take land out of Green Belt protection that would allow for the building of up to 11,000 new homes the Green Belt review being planned is described as a selective one, and 'will be undertaken as part of the Allocations DPD'. I would urge that the following points suggest this plan needs revision in favour of a much more careful, comprehensive and preparatory process:

1. Where such a large amount of land is to have protection withdrawn it is not satisfactory for each site to be considered independently. The relative strategic value of such land will vary, and so it will be important to assess the whole of the current Green Belt for sites to be identified where the damage to settlements and landscape will be less than in other locations.
2. It is clear that the Green Belt that currently protects Bradford and its neighbouring settlements is

varied, and has differentiated levels of sensitivity. It is important that these are identified and responded to in any review of the Green Belt.

3. To tackle a selective review of the Green Belt as part of the Allocations DPD suggests that the Council are putting the 'cart before the horse', and are attempting to justify their pre-judged allocations of green belt protected land before a fair review has taken place. This smacks of 'bull-dozing' the process, and disregarding the need for a high level of co-operation with neighbouring authorities and other strategic partners in the fair process of such a review.
4. My particular concern relates to the Tong and Fulneck valley, an area that borders on Leeds, Bradford and Kirklees, and where it is particularly important that Leeds and Bradford share a common vision for sensitive land surrounding conservation areas that demands a holistic vision for future development. It is clear that there has been widespread disharmony and dysfunctionality in the past between Leeds and Bradford in respect of this area that is still being reflected in deeply contrasting policies for ongoing development. To address this requires a robust and comprehensive review of the Green Belt at this stage to ensure much better corporate responsibility for land, common to both, that has important heritage and recreational implications.
5. I would suggest that Bradford's proposed method in MM17 that will necessitate a huge invasion into green belt protected land is minimalist and inadequate.
6. Furthermore, Bradford's claim that such green belt release is warranted by 'exceptional circumstances' remains unconvincing, despite requests from the Planning Inspector that they improve their statements to clarify their justification of this. Whilst their response is much more verbose, the content of their statement offers little additional justification.
7. The Council's reference in MM18 to the Growth Study is of great concern as this contains an indication that in addition to withdrawal of green belt protection for 2,700 new homes in the Tong and Fulneck Valley, they would also be planning for a much larger release of land for industrial development alongside the construction of a new highway Link Road from the A650 at Tong Land End to the A6177 at Thornbury. It cannot be satisfactory that plans are being considered that would lead to even greater wholesale destruction of extremely sensitive land without these being identified at this stage in a way that gives opportunity for such plans to be challenged.

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.

A comprehensive review of the Green Belt should take place in full co-operation with neighbouring authorities and other strategic partners in advance of any publication of an Allocations DPD

11. Signature:

[Redacted Signature]

Date:

20.1.16

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