City of Bradford Metropolitan District Council

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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	**Jeffrey**	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2		
Line 3		
Line 4	**Bradford**	
Post Code	**BD4** [redacted]	
Telephone Number	[redacted]	
Email Address		
Signature:	[redacted]	**Date:** 23.3.14

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	20(5)	Paragraph	b	Policy	Soundness

4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	
4 (2). Sound	Yes		No	X
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.

1. Both the NDP and the Core Strategy make no attempt to show how the infrastructure requirements of such a large new development would be met or be sustainable. Clearly this would have a significant impact on Leeds and Kirklees, which is probably one of the reasons they have objected to both documents, but this seems to have been ignored rather than addressed.
2. Holme Wood could not sustain a new development which is much larger that itself, nor has there been any credible evidence put forward that it would benefit from it, either socially or economically – it is more likely that it could cause damage. The only part of this plan which would immediately improve and benefit Holme Wood, would be the building of the 900 new homes within the current boundary, which I would support.
3. Traffic Congestion on Tong Street will inevitably be worsened by the scheme. The proposed new access road would also lead to more traffic finding its way through Holme Wood. Moreover, if the link road from Westgate Hill goes ahead, this would destroy even more green belt, including ancient woodland at Black Carr. It would also need to be agreed with neighbouring authorities which seems unlikely given that Leeds Council has already objected to the whole plan.
4. The rural farm roads leading to and from Tong and Tyersal are unsuitable for any increase in traffic. The increase in traffic through Tong Village – supposedly a Conservation Area – will also have a significant negative impact.
5. The policy of protecting Green Belt land unless there is no alternative seems to have been ignored since this plan was already included in the NDP, In fact Bradford Council does has not produced a Green Belt policy, nor is there any negotiation with neighbouring authorities to reach agreement on

this.

6. This is not consistent with national policy on Green Belt protection, the Core Strategy does not reflect the importance of prevention of:

   Urban Sprawl – current natural boundaries of Westgate Hill Street, Holme Lane, Ned Lane effectively control this and are defensible, the proposed sites boundaries are arbitrary and largely indefensible.

   Merger of Neighbouring Towns – in particular site SE101 which cuts deep into the valley would greatly increase this risk.

   Safeguarding countryside from encroachment – this area of green belt is an important piece of countryside between two large cities providing leisure opportunities for residents of Bradford, Leeds and Kirklees. It also includes Black Carr Woods, the largest area of ancient oak woodland in the district.

   Preserve the Settings of Historic Towns and Villages - The ancient and historic communities of Tong and Fulneck and the recreational benefit that they offer to the substantial number of visitors who benefit from them require strong maintenance of the protection currently secured by the green belt land that surrounds them. Both are rightly identified as Conservation Areas, and both offer unique historical and cultural attraction within the largely urban life of West Yorkshire.

7. There is no sign of any cross boundary agreement for the Urban Extension despite the substantial social and economic implications that such a development would have for Leeds and Kirklees.

8. There is no clear time frame given for the Urban Extension, and there are conflicting statements made in Council documents that indicate confusion as to how and when land for the Urban Extension would be released.

9. All of the land under threat in these plans in protected by Green Belt, however large areas of brown field and other derelict sites exist all over Bradford, something which the Telegraph & Argus has been pointing out for many months. The need to give priority to brown field and other derelict sites has been a consistent and universal message from a wide range of politicians and campaigners in Bradford. However rather than pursue these credible and obviously more beneficial alternatives, the Council seems to have caved in to the preferences of developers who for obvious reasons would prefer green field sites, hence why this development has now been given priority. All the more reason therefore to maintain protection for the Tong Valley to ensure that the substantial areas of Bradford land that needs regeneration is developed first.

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.

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?

X	**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: [redacted] **Date:** 23 · 3 · 14

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM

[redacted]