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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	COUNCILLOR	
First Name	[redacted]	
Last Name	BLACKBURN	
Job Title (where relevant)		
Organisation (where relevant)	[redacted]	
Address Line 1	[redacted]	
Line 2	FARNLEY	
Line 3	[redacted]	
Line 4		
Post Code	LS12 [redacted]	
Telephone Number	[redacted]	
Email Address	[redacted]	
Signature:	[redacted]	**Date:** 26th March 2014

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	**3, 4 and 5**	Paragraph	**Key Diagram – Location Strategy and Key page 66/7, 4.1.3, 5.3.22, 5.3.34, 5.3.35, 5.3.37, 5.3.42, 5.3.61, Appendix 6 Table 1 page 358, Appendix 6 Paragraph 1.9 Page 363**	Policy	**Sub-Area Policy BD1 C 1., Sub-Area Policy BD2 E and Policy HO2 B 2.**

4. Do you consider the Plan is:

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

A: LEGAL

1st REPRESENTATION

Flawed Consultation Process – Tong and Holme Wood Neighbourhood Development Plan (NDP) and Local Development Framework Core Strategy Further Engagement Draft (LDF FED). These two were supposed to be available for public consultation that was run in parallel, whereas the NDP process began and was completed in advance of the LDF FED, indicating that the NDP was driving the policy of the LDF FED rather than being driven by it.

2nd REPRESENTATION

Inaccurate and misleading designation of the 'Tong and Holme Wood Neighbourhood Development Plan'. The Localism Bill sets out a clear framework for the formation of NDP's which the Tong and Holme Wood NDP fails to meet. No attempt was made by Bradford Council to reshape the Tong and Holme Wood Partnership Board so that it met the requirements of the Localism Bill in devising an NDP. The Draft Core Strategy refers frequently to the Tong and Holme Wood NDP in a way that assumes validity for it that should not be claimed.

B: DUTY TO CO-OPERATE

3rd REPRESENTATION

Failure of the Core Strategy to show how the 'Duty to Co-operate' has been approached and fulfilled. There appears to be no documentation in Bradford's draft that identifies those with whom it has co-operated, how this has been done, and what has been achieved through the process.

Failure to Co-operate with Leeds MC. There is no sign of any committed and sustained co-operation between Leeds and Bradford despite the sensitive geographical adjacency of the green belt protected land that separates them. Leeds Council's objection to both the Tong and Holme Wood NDP and to the Core Strategy LDF FED and Bradford's hostile response exposes a failure to achieve this. The Core Strategy fails to identify the process that has been followed to meet this requirement, either in the on-going process of the formation of the Core Strategy or in the completion of its final form.

Failure to co-operate with public bodies. We can find no evidence of co-operation with health authorities and water companies despite the increased health care challenges that would ensue from the Urban Extension, and the increased flood risk that would be brought to Pudsey Beck, Troydale and lower down the water course in Farnley & Wortley where there has been a recent history of flooding and so is included in the recently published Leeds Flood Alleviation Plan.

C: SOUNDNESS

4th REPRESENTATION

Not positively prepared – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.*

Infrastructure Requirements: There is no attempt in either the NDP or the Core Strategy to show how any of the infrastructure requirements of such a large new community for it to be

sustainable would be met. The development would have significant impact upon the Leeds wards of Farnley & Wortley, Morley North and Pudsey, but there is no sign of this being recognised or planned for.

Effect on Holme Wood: To describe the new development as a 'Holme Wood Urban Extension' is misleading. Holme Wood does not have the infrastructure capacity to 'own' or provide for a development of this scale. We believe that the main bulk of this new development will not assist Holme Wood to become a more socially and economically mixed community, and may well further damage its potential.

Transport and Traffic Concerns:

- **Congestion** Bradford has been assessed as the third most congested city in the UK with regard to , and traffic surveys have shown that Tong Street (A650) is the most congested road in Bradford. To build such a vast new housing development that will inevitably lead to further congestion on Tong Street is foolhardy.

- **Road Provision.** There is confusion about Bradford's intentions regarding road provision for the Urban Extension. There is conflicting evidence regarding a proposal to build a new highway link road from Westgate Hill to Thornbury, or to only provide the new community with an access road. If it were only an access road, the effect of traffic growth through Holme Wood would be unacceptable. If a link road were to be built there would be even further devastating major green belt loss, and serious ecological threat to the important ancient woodland of Black Carr Woods. Such a road would require agreement and support from neighbouring authorities

- **Rural Roads** The rural farm roads that lead to Tong or Tyersal are entirely unsuited to carrying the increases in traffic that would result from the Urban Extension, and further substantial traffic increases in Tong Lane through the Tong Conservation Area would be highly undesirable.

- It will also add to the traffic problems at the Driglington crossroad in Morley North Ward and on the B6154 (Tong Road) through Farnley, Upper Wortley, Armley and down to the Armley Gyratory.

5th REPRESENTATION

Not Justified – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.*

Green Belt Priority The loss of green belt protected land should not take place unless there is no alternative, yet we do not see any sign of this having been a priority with those who are making these proposals. Indeed the prior inclusion of this in the NDP indicates a lack of genuine commitment to green belt protection by Bradford Council.

No Greenbelt Policy We are not aware of Bradford Council having produced a Green Belt policy that has a cogent strategy for the redefining of greenbelt – nor are we aware of any negotiation taking place with neighbouring authorities to reach common agreement on this.

6th REPRESENTATION

Not Effective – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.*

Cross Boundary 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.

Time Scale 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.

7th REPRESENTATION

Not consistent with national policy – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

Green Belt Protection All of the land that we are concerned about currently enjoys Green belt Protection. The National Planning Policy Framework (NPPD) requires the same high level of protection to the Green Belt as in the previous Unitary Development Plan (UDP), and identifies five purposes served by the Green Belt. The Core Strategy does not reflect the importance of these – indeed they are not mentioned in the document; nor does it reflect any clear commitment for minimising green belt release.

Each of the Five Purposes will be compromised by the proposed Urban Extension to Holme Wood:

1. **Prevent Spread of Urban Sprawl**

The Green Belt currently controls effectively the growth of urban sprawl both between Tong and Holme Wood, and between the Metropolitan Districts of Bradford, Leeds and Kirklees. In particular the boundary to the green belt provided by Westgate Hill Street, Holme Lane and Ned Lane is adequate and defensible. The proposed sites and boundaries identified on the SHLAA plan for the Urban Extension are arbitrary and largely indefensible.

2. **Prevent merger of Neighbouring Towns**

Vital Lung: The green belt provides a vital countryside lung between the neighbouring authorities. The threat of coalescence between Bradford and Leeds was a key reason for the objection to the NDP and FED by Leeds Council. The threat of such coalescence has increased in the current plan with the inclusion of site SE101.

3. **Safeguard the countryside from encroachment**

Vital Countryside: The current boundaries enable the preservation of important countryside opportunities in the Tong Valley for residents of Bradford, Leeds and Kirklees. In fact it would have a disproportionate effect upon the West Leeds Country Park project and would effectively lead to a reduction in biodiversity in the area. Bradford's concept of a major new highway to be constructed between Westgate Hill and Thornbury would further destroy important countryside, and threaten the ancient woodland at Black Carr Woods.

4. **Preserve the setting of Historic Towns**

Tong and Fulneck: 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. Fulneck became the key settlement of the Moravian Community in the 18th century, and has retained much of its unique character. Tong is included in the Domesday Book; Tong Hall is a Grade One listed Queen Anne building; Tong Church is also Grade One, has Saxon and Norman origins, and has original 18th century fittings and furnishings from its rebuild in 1727 by leading Methodist preacher, John Nelson. Tong Village has a wide range of other listed buildings and features.

5. **Recycling of derelict and other urban land.**

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 the challenges that exist in tackling this can motivate housing developers to seek access to alternative countryside sites that are more attractive and profitable to develop. The need therefore to maintain protection for the Tong Valley is vital to ensure that the substantial areas of Bradford land that needs regeneration is given priority.

8th REPRESENTATION

Not positively prepared/justified/effective – *detail of these as above*

This representation relates specifically to the failure of the Plan to recognise the special landscape character of the Tong Valley in SE Bradford, the historical significance of that area and of the conservation area comprising Tong Village and the place of the Tong Valley and Tong Village in relation to the historic Moravian settlement and village of Fulneck (part of Leeds MDC).

We ask for revision of the Plan to recognise those features as well as the cultural, recreational and leisure potential of the area and to make it clear that Tong Valley will be included in proposals for a Leeds/Bradford Country Park.

We also ask for the correction of an apparent error in Policy EN4.

We believe that the Tong Valley is an immensely valuable recreational and leisure asset for Bradford with important historical associations. Bradford has in the past paid little attention to the important area, first by selling Tong Hall, then by pulling out of the Tong Cockersdale Partnership and now by proposing that the area should be the site of an urban extension. We feel that this position should be rectified by the positive statements in the Core Strategy that we are suggesting should be introduced and that real vision should be displayed now for its future.

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.

Notwithstanding the flawed procedures in drawing up the Core Strategy which bring its legality into question and the non-compliance with the duty to co-operate, the following should be included in the Bradford MDC Core Strategy to provide soundness in representing the city.

The revised Plan should work co-operatively with neighbouring authorities so as to prevent urban sprawl, prevent the merger of neighbouring towns and maintain biodiversity.

The revised Plan should take due note of a coherent Greenbelt Policy, once Bradford MDC develop one.

The revised Plan should prioritise brown field and other derelict sites to promote re recycling of land for development rather than create a default assumption for green field developments.

The revised Plan should recognise the unique cultural and historic features of the Tong Valley area as well as its recreational and leisure potential and make it clear that Tong Valley will be included in proposals for a Leeds/Bradford Country Park.

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	**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:

To further develop arguments.

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:**	26th March 2014

Core Strategy Development Plan Document (DPD) : Publication Draft

PART C: EQUALITY AND DIVERSITY MONITORING FORM