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City of Bradford Metropolitan District Council

Representations Form

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Please use this form to make comments about a current planning application. Any comments will be open to public inspection and may also be published on our website and therefore be viewable by anyone via the internet.

Application Summary

CORE STRATEGY Documents

Application reference: Local Plan 2011

Address of proposal: 2nd Floor, Jacobs

Proposal: West (D1) SRU

Your Details

Bradford Urban Wildlife Group

Your name: Mr STEAD

Your address: Bingley

Postcode: BD16

Your Comments

- Nature of submission: (please tick one box)
- Inform the Authority that you object to the Planning Application
 - Inform the Authority that you do not object to the Planning Application
 - Provide the Authority with comments on the Planning Application

Comments:

1. A request to be notified of the stages of the above address (as is usually the case) for 1 - The DPP has been submitted for independent examination
2. The Report of the Inspector carrying out an examination into DPP.
3. Core strategy DPP adopted. The first two are important

Theris
85

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Application Summary

Application reference:	Core Strategy Statement of PLE
Address of proposal:	Consultation Further Engagement
Proposal:	Draft October 2013

Your Details

Your name:	Mrs [Redacted] ST Eads Bradford Urban Ltd
Your address:	[Redacted] [Redacted] [Redacted]
	Bingley Postcode: BD16

Your Comments

Nature of submission:
(please tick one box)

- Inform the Authority that you object to the Planning Application
- Inform the Authority that you do not object to the Planning Application
- Provide the Authority with comments on the Planning Application on Decisions

Comments: According to the statement of PLE - Consultation Further Engagement Draft P. 110. 41. Sites in selected (Bingley) sites will be allocated in the PPD site Planning Application. Most of these sites which were proposed by Land-owners are in the Green Belt and Local Areas. We are hoping when the DDP is to be looked at, that the Committee will take certain factors into account, namely the area surrounding the Gilstead Playing Fields (a small Nature Reserve is designated a Queen Elizabeth II Field. The surroundings are within or near to

a "Buffer Zone" for the Saltane Heritage Site. The whole Buffer Zone includes Messers Fields Woodland and its historical traditional orchard (the latter now to be assisted for a local site designation) French meadows SSSI. Strategically this has not been thought through and the landowner should never have offered this Area for Development because part of the Area lies between the Messers Fields kitchen garden and the Woodland.

The Area was also a part of a "Farm Shop" and Land Selling Free Range eggs to the public a vital source of revenue for the farmer and other vital green equipment.

Bingley does not need to be a "Principal town". Bingley does not need all the houses projected (There are houses for sale every week in the Telegraph Arms. Who is buying those houses?)

The other sites - Eldwick - Sherrif Lane etc. are also on the edge of a Conservation Area - Shipley Plea. Again strategically this has not been thought through.

The above is answered in the Further Engagement Draft P. 153.3. regarding the SHLAA

We are simply re-reading over objections. The NPPF is saying there may be green belt releases in Exceptional circumstances. The large areas of Green Belt land to be released (or potentially) in Pulstead & Eldwick (Bingley) are not exceptional circumstances and do not meet with the NPPF requirements.

So again why is Bingley a Principal town?

I will repeat this question over & over again.

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Application Summary

Application reference: Core Strategy - Statement of PPS -

Address of proposal: Consultation Further Engagement

Proposal: Draft October 2013

Your Details

Your name: Mrs [Redacted] Stead Bradford Action Wildlife

Your address: [Redacted]

Bingley Postcode: BD16 [Redacted]

Your Comments

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Comments: Page 57. 10 relating to Bingley and Development. A Overlooked Area was Principal towns category etc. We believe Bingley should not be designated a "Principal" town in the first place. Our reasons will be given elsewhere in this consultation process. We do wonder why and who is responsible for the allocation of Bingley to a "Principal" town? It seems the Council is right hand does not know what its left hand is doing! - Since Bingley is now being downgraded by the Council itself.

Greenbelt, p. 137. 3. We are told National Planning allows changes to the Green Belt under exceptional circumstances. The Prime Minister (David Cameron) has stated on TV (in Countyfile elsewhere) there will be no Green Belt allocated for housing - therefore no should not have allowed this in the National Planning. Since it appears that the housing allocated figures for Bingley assume land out of the Green Belt (Edwick, Fildes especially) are not sustainable and are not exceptional changes but fundamental allocations (All because Bingley is a Principal Town)

p. 139. 10. Supply SHLAA. It is not surprising that a lot of Green Belt has been put forward for development since it appears that Developers have been included on the SHLAA group in the Council's response. This is not acceptable!

Page 152. 13. Target for Bingley

This support for 1600 new homes in Bingley is not acceptable and is unsustainable. Additional new housing will not support the town. Our elected Council has already "run down" many facilities in the town for cut-backs etc.

- a) Trying to close the Bingley Pool.
 - b) closed the Council shop
 - c) No Commitment to encouraging the local market to expand.
 - d) possibility of the local toilets involved in cut backs (in spite of Bingley Supporting a music Festival.)
- new houses in Bingley and surrounding will not necessarily support Bingley.

There has been enough development in Edwick / Fildes over the last several years.

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Application Summary

Application reference: Core Strategy Document

Address of proposal:

Proposals:

Your Details

Your name: MRS [redacted] Stead - Bradford Urban Wildlife

Your address: Group [redacted] [redacted]

Bingley Postcode: BD16 [redacted]

Your Comments

Nature of submission:
(please tick one box)

- Inform the Authority that you object to the Planning Application
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- Provide the Authority with comments on the Planning Application Case Strategy Document

Comments: Core Strategy Development Plan
page 42. c. indicates " Biodiversity
landscape or heritage assets define character
setting of the District; Principal Towns"
Biodiversity, landscape or heritage will all
be affected with the number of houses
proposed. P. 43 Bingley will not be streng-
thened as the main local focus for housing
employment etc. Do we need to repeat Bradford
Council is cutting services and there will be
less money for all cultural activities etc put
forward in this Report.
The Planners for the Core Strategy need
to get real! There is no joined up thinking.

Green Belt does not just have to be a long short term protection for 15 years but long term permanently as this very small island of green belt gradually lose more green spaces. We just do not have room for more & more development (I believe most planners, politicians etc are putting their heads "into the sand". They should look at a map of Europe and see how small the UK is compared with Europe & other places. It is sound common sense we do not have the room.)

According to the map page 388 - South Pennine Moors Zones of influence we notice the Zone B1. 2.5km boundary is a precautionary zone for development. This zone is almost covering a fraction of North Bingley - i.e. Eldwick / Fulstoad. Bingley itself is in the Zone B11 7km boundary - mitigation zone. It would appear that the upper zones of High Eldwick or lower down Fulstoad are within an area where Curlew have been recorded Curlews are present within the environment of Eldwick & Fulstoad, and therefore to take out some of the land for housing actually would interfere with some bird species including curlew. The maps in the Habitats Regulations Assessment for Supporting habitats by key bird species (all records) suggests grassland habitats for curlew are well within the Eldwick / Fulstoad precautionary zone.

Farming. p. 20. 2.59 - 2.60. Background & context - A statement here that the Council will work with farmers etc - just to say that a working farm at Fulstoad has free range hens & their eggs for sale & farm shop - important for the local community and this is an area adjacent to the playing fields & menor fields garden estate. It was designated in EU LHA for housing & is free belt. Please adhere to the Core Strategy Document for protecting farmers & agriculture.

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Application Summary

Application reference: Core Strategy Document

Address of proposal: _____

Proposal: _____

Your Details

Your name: MRS [REDACTED] STAAD BRADFORD URBAN

Your address: WILDLIFE GROUP [REDACTED]
[REDACTED] Bingley Postcode: BD16 [REDACTED]

Your Comments

Nature of submission:
(please tick one box)

- Inform the Authority that you object to the Planning Application
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on Core Strategy

Comments:

Page 41 of 3 Strategic Core Policies (SCP)
Hierarchy of Settlements - Regional City
"create new and improve existing green
areas, networks & corridors including urban
fringe to enhance biodiversity etc."
 I refer to the Strada Canal Road Corridor
 which lies outside the station, an important
 area of field for several species of
 butterflies. Unfortunately we are awaiting
 a Planning Application (provisions) response

from the Secretary of State. We would prefer this B&A or part of the field to be a "new green space". Again unfortunately there are too many houses to be built.

making a policy to enhance Biodiversity will not work unless this can be achieved on the ground. It may mean cutting down develop-
ment to enhance to existing Biodiversity.

I refer to your Policy - Green Infrastructure page 53 - C & P. 54. Green spaces and Corridors which can be assessed as making a significant contribution towards the above criteria will be protected. (Criteria improving opportunities for walking - cycling
rights of way - ecological networks etc.)

P. 56 3.97. Positive Planning for GI may have an impact on the density of development. Please note this in relationship to the Canal Road Corridor. The footpath through the field is already a Dales Way walking route.
Arisedale p. 83 Environment D.

1. protect & enhance landscape character & range of habitats - wetlands - Woodlands etc. 1400 houses in Bingley and Green Belt changes will not protect & enhance the landscape wildlife.

page 84. 6. Conserve and enhance the designated heritage assets etc - within the Boundary of Saltburn World Heritage Site. (Please adhere to this when planning to take out areas of Green Belt or grassland)

Bingley: Arisedale p. 86 4.2.3.

I have referred to Bingley again. The outcomes for 2030 - creation of a new market - new square. We already have a good square for market stalls. Jubilee Gardens does not need to be designated!

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Application Summary

Application reference: Core Strategy Document

Address of proposal: _____

Proposal: _____

Your Details

Your name: Mrs STEPH BROADBENT ALBION WALKER

Your address: Life Pass _____
Bungley Postcode: BD14

Your Comments

- Nature of submission: (please tick one box)
- Inform the Authority that you object to the Planning Application
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Comments: Bungley - Continued Amendments
we already have myrtle walk shopping
centre & new library! I repeat Bungley
is not being supported by the main Council
facilities are being run down through
lack of money or reduced services
The planners need to get into the real
world. This Document is not addressing
the present problems. More housing will
create more problems - more traffic through
the main street & the Relief Road.

The targets for more housing needed in Airedale & Bradford itself are unsustainable - are not needed. Green Belt land should be nearly all protected - eventually in years to come most of more Green Belt land will have to be used - what does it end - again we are only a small island (there are plenty of houses for sale every week in the PSA - there are old multi-resident houses all of which should be used.)

Planning for People - Housing

P. 167. 3. WPA & South Pennine Moors Birds and Habitats Surveys.

The desired locational strategy, to assess whether SHLAA filter would affect wildlife habitat areas of value (Consultants Urban Edge) is probably flawed since Areas of High Biodiversity - edge of Bauldon Moor - edge of Skipton Glen will be affected by even small developments.

Reversing Biodiversity decline - As

page 216: 5.4.37 - Page 217: 5.4.40.

It is further development and housing which is endangering Biodiversity decline. Economic growth is the enemy. Politically Economic growth is the "Be all and end all" for governments. Trying to secure Biodiversity gains through Development is an non-achievement. The Council is trying to address the Biodiversity issues in the Core Strategy - however the Economics and Housing issues override the Biodiversity issues.

Ecological Connectivity

The BOWG agree with - to increase habitat linkages in the district in relationship to grassland Woodland heathland etc and to stop fragmentation of habitat.

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Application Summary

Core Strategy Document

Application reference:

Address of proposal:

Proposal:

Your Details

Your name: Mrs

STEAD, Roadside, Widdow

Your address: Road

Bingley

Postcode: BD16

Your Comments

Nature of submission:
(please tick one box)

Inform the Authority that you object to the Planning Application

Inform the Authority that you do not object to the Planning Application

Provide the Authority with comments on the Planning Application
Core Strategy Document

Comments:

Environment - Woodlands grasslands
uplands. Page 220. 5. 4. 59. We are
aware of the work done by West Yorkshire
Ecology to identify grassland, Woodland
Wetland & Heathland networks - Habitat
Linkages. With reference again to the Corral
Road Corridor it is not enough to encourage
Biodiversity along the Corridor Back (How
wide is a corridor?) and not take into
account the wider area of field and its
already existing Biodiversity. Developer:

and Council Planner should take note of this Document's suggestion that habitat networks that aid species movement need to be integrated into the master Planning of Development at an early stage to avoid corridors being blocked page 221. Habitats and species outside
Designated sites

Assessment needs to take account of West Yorkshire Local Site Selection Criteria. We approve of this proposal, but it needs to be taken more seriously by Planners & Developer and Council Committee.

page 223 5.4. ~~62~~ 62.

Note. Ecological networks and Biodiversity enhancement opportunities will be integrated into plan making as part of the wider green Infrastructure approach for the District etc.

We would like to see this taken on by Developer & Planners. At the moment it is not having the required effect.

Traditional Orchards

Habitat Importance - P 380 Traditional orchards are down in the Table on this page and page 382. Looking at the chart for orchards we are given 30 for Yorkshire Southern Pennine Funge, 55 under North Yorks & Derbyshire etc. 140 for Pennine Dales Funge. I wonder where Bradford comes into this chart if at all?

To point out we have a Traditional Orchard in the former Field Kitchen garden of St God historically connected to St. Peter's East of Saltaire. It has been allocated a Wildlife Area & we hope it will go through as a local site.

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Application Summary

Sustainability Appraisal of the Bradford Core Strategy Publication

Application reference:

Draft Annex

Address of proposal:

Proposal:

Your Details

Your name:

Mrs [redacted] Stood Bradford Wildlife Wild

Your address:

[redacted] [redacted] [redacted]
Bingley Postcode: BD16 [redacted]

Your Comments

Nature of submission:
(please tick one box)

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Statement

on Annex Appraisal

Comments:

page 10. (3) "Conserve and enhance the internationally, nationally or locally valued wildlife species and habitats"
Our comment relate to: Does the Plan seek to prevent habitat and wildlife Corridor fragmentation?
Because this is new, the Council planner Developer & Council Committee themselves are not taking this into account example - Canal Road Corridor
The fragmentation of Habitats must be put into Planning laws & rules or else where Development is covered will be overlooked.

adverse effects on the level of housing being proposed on SAC's & SPA's. need housing to avoid direct or indirect impacts on supporting habitats.

We agree and there must not be too much land in Greenbelt either in the West/Baldon glkley to be removed, which would interfere with a "Buffer Zone" on either a mile or two from the moors (getley also) page 460.

"Impacts on wildlife and habitats does not play a part in the Policy SCS relating to Development" etc.

We agree that Considerations to Wildlife and Landscape must play a part in deciding which areas of Green Belt should be removed for housing.

Policy SCS location of Development

We agree with ~~the~~ this statement that the policy should clarify the situation regarding the potential conflict between brownfield land that is of high Biodiversity Value and greenfield land that is of low Biodiversity Value.

Biodiversity Value -

A case in point is the Canal Road Corridor

We keep Field outside the station of high Biodiversity Value - (now designated for housing of Morrison's app given the 1st vote by Sec of State) Policy B01. City of Bradford including Shipley and to the low Baldon sub PLAs. The comment on new housing via Canal Road Corridor, a comment is made about Bolton Woods Quarry, a Bradford wildlife area, should be protected from Development. However the Shipley Station Bull Ring meadow also a Bradford Wildlife Area (due to go through to a local site) is not mentioned and is protected. Part of the field outside the Station should also be protected from Development.

Appendix X



Local Biodiversity Action Plan for Bradford District

13.5.14



Document title	Relevant objectives	Targets and indicators	Implications
Local Biodiversity Action Plan for Bradford District City of Bradford Metropolitan District Council, 2003	See previous. Increase in known Colonies - Common Road Creeper - lounge fields outside site of Station. Natural Colonisation, surveys undertaken over last few years by TRAC.	Blue butterfly: • To increase the number of known populations by 10% above baseline survey levels by 2005 and 20% by 2010 for both species through natural colonisation. Brown hare: • Maintain present distribution of the species by providing protection from persecution and supporting those landowners who encourage a Brown Hare presence on their land whilst recognising that the species can be a pest and cause agricultural or horticultural damage. Some right to control numbers may be necessary in certain circumstances. • Encourage a wider spread of the species throughout the District by supporting a return to less intensively managed grassland and promoting agri-environmental schemes. • Continue monitoring spring numbers of the species through joint surveys with groups such as the Bradford Urban Wildlife Group. • Work towards 100% increase in Brown Hare population by the year 2010 • Raise public awareness of poaching in the District. (continues)	See previous.

Amec, Sustainability Appraisal for Bradford District, met. District Council, Feb. 2014.

From [redacted] s local
 [redacted]
 [redacted] Bragley
 BDI 6 [redacted]



this needs addressing by planning

Topic	Issuance Address
	<p>surrounding area.</p> <ul style="list-style-type: none"> Ensuring that Core Strategy policies and proposals have no adverse effect upon the South Pennines SPA and SAC and other Natura 2000 sites outside of the District, through Habitats Regulations Assessment. Safeguarding nationally and locally valued species and habitats and minimising the direct and indirect impact of new development on these. The need to improve and enhance the condition of nature conservation sites, particularly the South Pennine Moors SPA, SAC and SSSI. Seeking opportunities to create new priority habitats and woodland in the District. Promoting wider appreciation of benefits from environmental assets. <u>The need to protect wildlife corridors and networks from habitat fragmentation by development.</u> Improving the information base so that change can be monitored.
and Rural	<ul style="list-style-type: none"> Encouraging the sustainable long-term management of rural land, which balances the needs of agriculture and countryside recreation. Providing a framework within which to manage protection of existing habitats and creation of new ones, needs of agriculture, desire for recreation, need for alternative sources of energy, flood protection etc. Encouraging sustainable tourism; where benefits can be minimised and benefits do not exceed the capacity of infrastructure within the host community.
	<ul style="list-style-type: none"> Protecting and enhancing the variety of landscapes within the District, particularly those elements that contribute to their distinctive local character. Maximising the benefits from the landscape character assessment by using it to make choices about the locations for development and the design of proposals.
and monument	<ul style="list-style-type: none"> Protecting and enhancing the District's cultural historic and archaeological assets and their settings, particularly the Saltire World Heritage Site. The need to improve and enhance the condition of heritage assets at risk, particularly the Listed Buildings at Risk and the Adwalton Moor Registered Battlefield. The potential for unknown/unrecorded archaeological sites and finds to be present in the District. Using the Conservation Area appraisals, and the Saltire World Heritage Site Environmental Capacity Study to inform choices about development and the design of proposals. Improving the public realm and seeking to promote high standards of design and sensitivity to context where regeneration is needed.
Soils	<ul style="list-style-type: none"> The preservation and conservation of the District's geological assets, particularly the Yeadon Brickworks and Railway Cutting SSSI and the District's RIGS. The need to safeguard and improve soil resources. Addressing contamination issues relating to previous land uses.
	<ul style="list-style-type: none"> The need to safeguard surface and groundwater resources and to improve water quality. The need to take account of the impact of development on the management of water. This should include assessing the risk of flooding, reducing that risk and mitigating its effects. Ensuring that future development contributes towards increasing flood storage provision, improving drainage infrastructure and promoting the use of sustainable urban drainage techniques.
	<ul style="list-style-type: none"> Maintaining and improving air quality within the District in line with both National Air Quality Standards and the principles of best practice. Seeking to secure a reduction in emissions from sources which contribute to poor air quality.
age	<ul style="list-style-type: none"> Planning for the adaptation of and long-term resilience of the District to the impacts of climate change. Improving energy efficiency and increasing use of low-carbon and renewable energy.

stead 130006

Bradford 13016

KEY

Move away significantly

+

Move away marginally

0

Move towards marginally

?

Neutral

Move towards significantly

Uncertain

SA Objectives

Policy BD1 - City of Bradford including Shipley and Lower Baildon Sub Area

Complementary

The following new transport projects are proposed whose development could have an impact on water quality or flood risk. It is recommended that in promoting these the development the policy wording of the Transport section should be amended to reflect that the environmental impacts of these developments will be fully considered and appropriate mitigation adopted to minimise or avoid adverse effects prior to them being taken forward, particularly in respect of the following water-related aspects:

- Light Rail Link Interchange to Bradford Forster Square.
- Low Moor Rail Station.
- Apperley Bridge Rail Station, this may impact on the Green Belt, be at risk of flooding and result in loss of the floodplain increasing flood risk elsewhere in the catchment depending on the nature of the final proposal.
- South East Bradford Link Road and the Connecting Airefolds Transport Improvement Project including Canal Road Corridor Improvements and the Shipley Eastern Link Road to ensure the viability and delivery of housing and economic growth in the City of Bradford; this may impact on open space and Green Belt depending on the nature of the final proposal.
- Shipley Eastern Link Road, this may impact on open space depending on the nature of the final proposal, a crossing of the River Aire will definitely be required with associated impact on hydrology and flood risk.

Whilst Strategic Core Policy SC5 seeks to prioritise the use of PDL (provided that it is not of high environmental value), which would have positive impacts upon this objective, the loss of greenfield land/agricultural land in the following locations which will be required to deliver the number of houses proposed will have minor negative impacts:

- New housing development in Bradford city centre is most likely to be on previously developed land.
- New housing development in the Canal Road Corridor is unlikely to result in the loss of good quality agricultural land. Land at Bolton Woods is classified as Grade 3 (good to moderate) agricultural land, but a large part of this area comprises Bolton Woods Quarry and as a Bradford Wildlife Area should be protected from development.
- New housing development in Shipley is unlikely to result in the loss of good quality agricultural land. There is limited land in agricultural use and land is graded as Grade 4 (poor). However, new development in lower Baildon to the south of Otley Road may result in the loss of good quality agricultural land. Part of the Green Belt to the south of Otley Road is classified as Grade 3 (good to moderate) agricultural land.
- New housing development in NW and SW Bradford may result in the loss of greenfield land/agricultural land, all of the Green Belt to the west of Bradford is classified as Grade 4 (poor) land.

Scoping

new housing will result in a loss of Green Belt

Shipley Station
Bradford would lose Green Belt

Move away marginally