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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	MR	
First Name	[REDACTED]	
Last Name	GILPIN	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	BRADFORD	
Line 4		
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 28.3.14

## **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	<b>All</b>	Paragraph	<b>All</b>	Policy	<b>All</b>
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**4. Do you consider the Plan is:**

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

**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 :**

1. Consultation process for Tong and Holmewood LDP and LDF FED was implemented incorrectly. The public consultation was supposed to run together but the NDP consultation preceded the LCF FED therefore feeding the LDF FED not being moved by it.

2. Tong and Holmewood Neighbourhood Development Plan is inherently flawed. The NDP in no way recognises the guidelines set out in the Localism Bill and yet the Draft Core Strategy infers this is the case.

**B. SOUND**

1. There is no evidence to show how projected infrastructure demands created by the proposed development will be met and indeed its impact on neighbouring Councils (Kirklees & Leeds).

2. Traffic congestion on the already overloaded A650 would be greatly increased from an already intolerable level by the introduction of further vehicular traffic from the proposed housing. Confusion and ambiguity over possible new link road circumnavigating the proposed development would have massively negative erosion on further green belt and woodland. Conversely, if only an access road was used to facilitate the proposed development then this would result in serious and unacceptable volumes of traffic through Holmewood.

Narrow rural lanes bordering and within the proposed development site are wholly unsuitable for the increased traffic levels that the proposed development would generate and would compromise the agricultural activities of local farms and the recreational enjoyment of the vast number of walkers, cyclists and horse riders that regularly use this area.

3. Green Belt protection issues do not appear to have been considered by Bradford Council. Little or no effort appears to have been directed to review alternatives in terms of the justification of the Plan. The Plan to develop green belt should be the most appropriate when judged against alternatives. Bradford appears to have no policy for the redefining of green belt nor any evidence of agreement or consultation with adjacent Local Authorities.

4. Despite the high impact on neighbouring Authorities there is no evidence of effective joint working by Bradford Council and its neighbours to agree cross boundary strategies. No timescale for the proposed development has been made with Council documentation being confused and ambiguous.

5. Green Belt Protection is not a high consideration in the Core Strategy despite the National Planning Policy Framework demands.

The spread of urban sprawl will be compromised by this plan. The green belt affected by the proposed development at present controls urban sprawl between the village of Tong and Holmewood and the district of Bradford, Kirklees and Leeds. Present highway networks define and defend this green belt buffer while development on the proposed sites leaves urban boundaries unclear.

Prevention of the merger of adjacent towns/cities is compromised by this proposed urban development exacerbating the already close proximity of Bradford and Leeds.

The proposed urban development into green belt land is contrary to safeguarding Green Belt encroachment. Present green belt areas facilitate provision of precious countryside for residents of Bradford and its neighbouring Authorities. Urban development on this proposed scale along with associated highways would seriously compromise the social and recreational value of this area of green belt.

Maintaining present Green Belt land is key in the securing the protection of historical sites including Tong Village (designated Conservation Area) and the Fulneck Moravian settlement. The proposed urban development would erode this protection leaving them vulnerable for future generations. No considerations appear to have taken place by Bradford Council as to the impact on these communities.

Despite a wealth of brown field sites available within the Authority, Bradford Council appear to have paid little regard to its use, preferring to avail green belt to housing developers that are keen to use virgin sites. This retrograde ethos can only be redressed by urban development plans that embrace the need to protect vital areas of green belt

## C. DUTY TO COOPERATE

1. The Core Strategy contains no evidence of how the Duty to Co-operate has been fulfilled or the process by which this has been attempted.

2. There appears to be little evidence of in-depth consultation with Leeds MC despite Leeds Councils objections to the NDP and Core Strategy. This is surprising in view of the proposal which will dramatically affect the green belt land separating Bradford and Leeds.

3. There appears to have been little or no co-operation with water or health authorities with regard to the increased demand for health care created by the proposed developments or the increased H&S flood risk resulting from top water disposal to Pudsey Beck and Troydale which already experiences flood related issues.

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.

An appropriate process is required with regard to Consultations and time frames .

Major reconsideration of the Plan is required with regard to encroachment onto Green Belt land.

Impact on local communities created by this proposed development need to be appropriately investigated.

Consideration and consultations need to be made with regard to the negative effect on neighbouring Authorities.

Appropriate consultations need to be made with Health and Water Authorities to determine the impact on local services and H&S issues.

The Plan should be completely reviewed to ensure issues in Q5 above are met.

**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**

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:**

**Date:**

28.3.14

**Core Strategy Development Plan Document (DPD) : Publication Draft**

**PART C: EQUALITY AND DIVERSITY MONITORING FORM**

Bradford Council would like to find out the views of groups in the local community. Please help us to do this by filling in the form below. It will be separated from your representation above and will not be used for any purpose other than monitoring.

**Please place an 'X' in the appropriate boxes.**

