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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	Carter	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	Leeds City Council	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	Leeds	
Post Code	LS1 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 26/03/2014

#### 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		Policy	TR1
	4			TR3
	5			TR5
	6			TR7
				SC7

**4. Do you consider the Plan is:**

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

As Leader of the Conservative Group on Leeds City Council this response is on behalf of all 18 members of that political group.

As councillors on a neighbouring local authority our primary concerns is that planning and development in Bradford has due regard to potential impact on Leeds. As you will be aware there are already heavily congested roads linking Leeds and Bradford. From our point of view key roads are the A65, A658, A657, A6120, A647 and A6038. These provide vital communication links for local residents and those people accessing employment in Leeds City Centre. Leeds has its own housing plans that will also impact on infrastructure (and we have concerns about those also) taken together with Bradford's the potential level of housing development and its impact on West and North West Leeds is unsustainable on the present road network. The wards of Calverley and Farsley, Pudsey, Horsforth and Guiseley and Rawdon will feature roads that are even more congested than is currently the case.

In addition neighbouring communities in Bradford access NHS services, education and leisure in Leeds these are highly valued local services. Is there sufficient capacity, for example in doctor's surgeries, to cope with this new housing? Residents have a right to expect access to basic local services with housing proposed on both sides of the border, it seems to us that this will become an increasing problem as these housing numbers are built out.

We have highlighted a number of policies above that we feel need to be reviewed. Concrete proposals have to be put in place to deal with an increase in the number of journeys and the impact this will have on key roads and junctions between Leeds and Bradford. Productivity, growth and quality of life will all be curtailed if measures are not taken to alleviate congestion and impact on services.

There are a number of developments already in the pipeline that will directly impact on the roads we have identified these include proposals for new housing at Apperley Bridge, Thackley, Idle, Shipley and Lower Baildon, Menston, Esholt, Fagley and Holme Wood and the Tong Valley. Without proper provision for additional capacity on the roads or measures to mitigate against the increase in journeys the plans are not sustainable.

Simply encouraging a modal shift and greater use of public transport is not enough. Of course we hope that there is more use of public transport and that the number of private car journeys can be reduced, it is just that in combination with this there is a need for investment in the traffic network.

Of particular concern to the Conservative Group are the proposals to build 1,800 new homes on Greenbelt land in the Tong/Westgate Hill area. Without additional highway capacity this would add further congestion to an already badly congested area. In particular the Leeds/Bradford Road which already suffers from mile long queues would only get worse and further clog up an important route between the two cities.

Furthermore there would be capacity issues with regard to health services, schools and water and sewage disposal. The location of this development is also a concern. This is an important 'green lung' enjoyed by many residents for recreation and leisure activity, it also offers an important green buffer between Bradford and Leeds. This development would lead to blurring of the boundary between the two cities and likely further encroachment into remaining greenbelt through more piecemeal development in the Fulneck Valley. In addition any development in this area would threaten both historical buildings and

historical woodland. The area is home to a number of historic C17 and C18 farmsteads and also ancient woodland at Kit Wood, Park Wood and Black Carr Wood. New housing in this area would impact upon the rural character of this area and the unique landscape it offers to existing residents.

Policy SC7 refers to the greenbelt and the proposals to initiate a partial review. Firstly this approach was rejected at inspection in Leeds, so we are not certain a partial review will be possible, opening up the prospect of a more wide reaching review that would lead to a blurring of the boundary between Leeds and Bradford, typified by the proposals for Tong/Westgate Hill area. This inevitably will lead to villages and towns losing their identity and to a general coalescence of towns that have historically been part of Leeds and Bradford. In our view the Greenbelt must be preserved, whilst Leeds and Bradford are near neighbours and share a number of key goals moving forward, we do not wish to coalesce to such an extent that we become indistinct as cities.

Bradford has a right to grow as Leeds does, but we feel that the current proposals do not make sufficient provision to deal with congestion and impact on the road network, do not take note of the impact on other key community services and, given existing proposals, do not offer enough protection for the identity of local settlements through greenbelt protection.

**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.**

Policies TR1, TR3, TR5 and TR7 should give greater clarity as to how the road network will be improved to deal with what will inevitably be an increase in the number of private car journeys as well as, rightly, setting out the commitment to modal shift and public transport.

Policy SC7 should include more specific protections against avoiding coalescence of existing settlements and have greater regard to the impact of any Greenbelt development on neighbouring local authorities.

Is there any provision to ensure that there are sufficient health services, dental surgeries and school places? School places are already stretched on both sides of the Leeds/Bradford border, what will all this housing do and how will it impact on the statutory duties of both authorities to provide every child with a school place?

***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:**

I wish to reinforce the issues raised above.

*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 Signature]

**Date:**

26 March 2014

## 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.**

