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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	SMITH	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	TONG	
Line 3	BRADFORD	
Line 4	WEST YORKSHIRE	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 24th 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	ALL	Paragraph		Policy	
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4. Do you consider the Plan is:

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

This representation is one of 7 I have made on the grounds of Legal, Duty to Co-operate and Soundness .

They all relate to the Core Strategy Development Plan Document Publication Draft in particular those parts which refer to the Urban Extension at HolmeWood.

There will therefore be some duplication and equally, to minimise repetition, there are factors and details in the other representations which support this one.

Grounds of Objection

I argue that the Plan does not comply with the Duty to co-operate.

Particulars of objection and supporting evidence

1.1. The Urban Extension is referred to in the Publication Draft at Page 67, at Policy BD1 C.1 (page 73), Paragraph 4.1.3 (outcomes by 2030) (Page 64), Sub-area Policy BD2 E (Page 79) Paragraph 5.3.22 (page 158), Paragraph 5.3.34 (Page 161) Paragraph 5.3.35 (Page 162) Paragraph 5.3.37 (Page 162) Policy HO2 B 2 at Paragraph 5.3.37(Page 163), Paragraph 5.3.42 (Page 164), Paragraph 5.3.61 (Page 169),Table 1 to Appendix 6 (Page 358) and Appendix 6 paragraph 1.9 (Page 363).

The Tong Valley – A strategic location requiring exceptional levels of cooperation

1.2. The Tong Valley/Holme Wood area is in an incredibly strategic position. Any development there is bound to have significant direct and indirect effects on these neighbouring authorities and will require an exceptional level of co-operation, particularly between Bradford and Leeds MDC.

1.3. Tong Valley is a long triangular tongue or peninsular of Green Belt land at the South East corner of

Bradford District projecting into Leeds MDC.

- 1.3.1. On the north and north east it is bounded by the town of Pudsey and the Conservation Area of Fulneck (both in Leeds MDC).
- 1.3.2. On the east it is bounded by other Green Belt land within the Leeds MDC boundaries, including very small pockets of habitation at Roker Lane and Troydale.
- 1.3.3. On the south east side it is bounded by Cockersdale, which is also Green Belt land wholly within Leeds and comprising a large wooded area at Sykes Wood and open fields separating Tong Village from the settlement of Drighlington in Leeds.
- 1.3.4. The western or upper part of Tong Valley is bounded in part by a small area of land falling within the boundaries of Kirklees MDC in its Birkenshaw Ward and as to the remainder by small pockets of housing at Westgate Hill, two school sites, one of which is currently redundant, the largely private Mossdale and Denbrook and Holme Beck Park housing estates and existing largely social housing HolmeWood Estate.
- 1.4. The A650, known at its north western end as "Tong Street" and at the south eastern part as "Westgate Hill", runs the length of the western part of the Tong Valley area. At the Westgate Hill roundabout, the A650 becomes the "Drighlington By-pass", linking to the M62 and the M621. At the Westgate Hill roundabout the A 650 is also joined by two other roads, firstly the B 6165 "Bradford Road" which provides a direct connection with the Leeds settlement at Drighlington and secondly by an unclassified road "Cross Lane" leading to the settlement of Birkenshaw in Kirklees.
- 1.5. The location of Tong Valley is as illustrated in Figure BD1 in the Publication Draft (page 76). The area is more precisely shown at page 10 of the "Landscape Character Supplementary Planning Document Volume 7: Tong Valley 2008", and on the SHLAA Site and Strategic Parcels Map: Bradford SE (the Growth Assessment Map") at page 10 of the Bradford Growth Assessment prepared for the Council by Broadway Maylan and dated November 2013 (the "Growth Assessment"). Tong Valley is delineated in the Publication Draft on Figure EN4 on page 234.

Concerns about lack of cooperation in the preparation stages of the Plan

- 1.6. It has been a consistent concern of residents in the Holme Wood and Tong area that the relevant neighbouring authorities of Bradford and Leeds should be actively involved in plans for significant housing development on the boundary of the two authorities because of the need for adequate infrastructure to be provided and the recognition that to be effective and sustainable such housing development would require infrastructure to be in place across boundaries.
- 1.7. For example, at a public Neighbourhood Forum meeting held in Tong and Holme Wood on 19 November 2008, attended by Councillors and Officers from the Bradford Council's LDF team, residents asked what consultations there had been with an adjoining authority in the course of developing the plans for large scale housing development in the Green Belt at HolmeWood and received a non-committal response. (***Q. Have Leeds Council been consulted? R – Leeds themselves have to find 100,000 houses in their district and have raised concerns of developments this side of Bradford. Leeds Council is going through the same process, but is not as far on as Bradford.***
http://www.bradford.gov.uk/NR/rdonlyres/E9394CD6-794F-4C31-917A-E6FBD3143281/0/ConsultationLog_Holmewood_Jan09.pdf)

- 1.8. One Leeds Councillor, a former Leader of the Leeds Council, and representing an affected ward has said this:-

"Leeds City Council must object to Bradford's Core Strategy. There is a wholly unnecessary incursion into the Green Belt in Tong Valley and the Westgate Hill. This land is crucial as an environmental asset but also as the green wedge that separates the massive conurbations of Leeds and Bradford. I shall be doing everything I can to support the Tong/Fulneck Valley Association but the powers that be in Leeds City Council must not let us down. Cllr Andrew Carter."

Objections by Leeds

- 1.9. Leeds MDC as a planning authority has already lodged formal objections to the Plan, at the Further Engagement Draft stage in the autumn of 2011, demonstrating a lack of cooperation between authorities at that stage.
- 1.10. Leeds objected to Policy HO2 in the Further Engagement Draft, which identified HolmeWood as an urban extension (unchanged in this regards in the Publication Draft) and Menston for growth of 900 dwellings. Leeds said *"The significant scale of development proposed at Holme Wood and Menston will require significant encroachment into the Green Belt gap between Bradford and Leeds which would be contrary to the role of Green Belt. Also, traffic congestion and hazards would be created to roads in Leeds, particularly the A657 and routes to Drighlington and beyond, and the A65."*
- 1.11. Leeds also objected to Policy SC7 on the grounds that, as a Green Belt policy, it failed to give due regard to national planning guidance in preventing neighbouring settlements from merging. (This policy has not changed in the Publication Draft)
- 1.12. Leeds made similar objections to the NDP (which originally identified the Urban Extension and delineated its preferred locations for development).
- 1.13. Bradford made no attempt to seek to avoid objection by Leeds by trying to find some area of common agreement as to what level of development would or might be acceptable to Leeds. Quite the opposite.

Attacks by Bradford on Leeds "interference"

- 1.14. At the Bradford Executive Committee meeting on 20th January 2012, when the NDP was approved and the Urban Extension became official Council policy, Cllr Ian Greenwood, the then Leader of Bradford Council and Chair of the Executive, went out of his way to express disdain for the concern of any adjoining authority in Bradford's housing plans and made it clear that he was not interested in their input, however their residents might be affected.
- 1.15. The following day the Telegraph & Argus (the local newspaper circulating in Bradford) reported him as follows:-

"Council leader Ian Greenwood said of a resolution by Leeds Council to object to the proposals: "Leeds Council and Leeds residents do not decide the planning policy of Bradford Council."

http://www.thetelegraphandargus.co.uk/news/news_green/news_green_news/9485478.Holme_Wood_and_Tong_green_belt_housing_bid_recommended/

- 1.16. Councillor Greenwood continued his attacks on Leeds Council's purported "interference" in Bradford's housing plans in the press. The following report from the Telegraph & Argus on February 3rd 2012

illustrates the degree of lack of trust and co-operation which existed between these two authorities in relation to the cross-border planning of major housing developments

"The leader of Bradford Council has hit back at a Leeds councillor who criticised his authority's plans for hundreds of new homes across the district.

Coun Ian Greenwood said Bradford would not be dictated to by Leeds over its core strategy and Local Development Framework (LDF) after being accused of not co-operating with its neighbours. At yesterday's unveiling of Leeds City Council's own LDF, Coun Richard Lewis, executive member for city development, said it was "crazy" Bradford had not talked to Leeds when drawing up controversial plans for up to 900 homes in Menston in its core strategy and promised his own authority is "very well aware" of local opposition to the scheme.

But last night, Coun Greenwood hit back at Coun Lewis.

"[His] comments are surprising given that Bradford has not been consulted on or made aware of this stage of the Leeds plan," Coun Greenwood said. "We will of course consult with residents in Bradford and Leeds on issues that affect them and take a reasoned and thoughtful approach.

"We should be clear, however, that while we will co-operate with others, we will not be dictated to by Leeds Council in respect of issues within Bradford. Coun Lewis' comments might have more credibility if he had shown any real desire to engage in a meaningful and mature way on issues affecting Bradford's border with Leeds when he has had the opportunity to do so in meetings with Bradford councillors in the past."

At the launch of the Leeds strategy, which outlines a vision for the district for 2028, including potential sites for up to 70,000 new homes, Coun Lewis pledged to preserve the character of communities.....Coun Lewis said

"There should have been a lot more co-operation because it does seem to me crazy that we have developments close to our border, that are bound to have a huge impact on us, that people didn't tell us about."

<http://www.thetelegraphandargus.co.uk/news/local/localbrad/9510192.Council criticised over housing plans/>

- 1.17. There appears to have been no substantive co-operative discussions focussing on the major strategic proposal to place 6000 new homes in SE Bradford at the very fringe of the district and on the borders of both Kirklees and Leeds or on the infrastructural implications for these authorities.

Where there should have been co-operation across boundaries

- 1.18. There is no evidence of a detailed statement of how Bradford considers it has met its duty to cooperate obligations. In its "Background Paper: 1 Overview February 2014" (the "Background Paper") it states:-

"In line with the LCR agreed approach a draft table which documents the key strategic issues for the Bradford Core Strategy has been prepared and is found in Appendix 1. This is currently working draft and will be updated prior to submission to reflect ongoing consideration of strategic matters under the Duty to Co-operate. A further background paper will be produce[d] when the Plan is submitted setting out how the Council has met the duty to co-operate in preparation of the Core Strategy. In line with the

LCR agreed approach a draft table which documents the key strategic issues for the Bradford Core Strategy has been prepared and is found in Appendix 1. This is currently working draft and will be updated prior to submission to reflect ongoing consideration of strategic matters under the Duty to Co-operate. A further background paper will be produce[d] when the Plan is submitted setting out how the Council has met the duty to co-operate in preparation of the Core Strategy."

1.19. This further background paper should have been available at the representation stage.

1.20. The "LCR agreed approach" refers to an agreement of the Leaders Board of the Leeds City Region Partnership (the "Leaders Board") on 12th December 2012 following the receipt of a report from its Chief Officer on the Duty to Co-operate. This recommends the adoption of a "beyond the plan area" methodology as applicable to the Kirklees Core Strategy (now withdrawn following the Inspector's letter to Kirklees dated 13th September 2013) with the objective of using all reasonable measures to minimise the instances where *"objections are made to Plans being drawn up by other authorities in the Partnership"*.

1.21. This verges on an agreement "to keep tanks off the lawn" rather than for genuine cooperation.

1.22. The methodology and approach of the Leaders Board is not an appropriate substitute for proper consultation at each preparation stage of the Plan. Indeed as the Inspector said in the letter to Kirklees mentioned above *"consultation on an already chosen strategy....cannot take the place of co-operation through the plan preparation stages ...[the] "beyond the plan area issues" methodology is a useful exercise but only as a "mapping-up" tool designed to identify specific issues which have not been addressed through other co-operative plan preparation processes"*.

1.23. The decision by Bradford to pin its growth strategy around an urban extension at HolmeWood was taken in January 2012 and has not changed since. It was an "already chosen strategy" when the Leaders Board adopted its approach to the Duty to Co-operate.

1.24. The areas where the Publication Draft proposals impinge materially on adjoining authorities and bodies and where the views and suggestions of those authorities and bodies should have been sought and considered prior to Publication Draft are summarised as:-

Scale and location of new homes

1.24.1. In Appendix 1 of the Background Paper (Ref 1A) the Council states that it will discharge the Duty to Co-operate in relation to scale and location of new homes by *"engaging with adjoining councils in agreeing a detailed methodology for green belt review when undertaken through the Allocations DPD"*.

1.24.2. There is no evidence from the Background Paper that this key element in the Plan has developed out of co-operative debate with neighbouring authorities. There is an assumption that the numbers of houses needed for the district and their location is an entirely local decision, with "detailed methodology" linked to Green Belt review to be worked out with adjoining authorities at a later stage. There does not appear to be a correlation with the Interim Strategy Statement of the Leeds City Region Partnership of April 2011.

1.24.3. The Council's decision to seek to allocate land to meet a requirement (after allowances) for at least 42,100 homes in the period 2013 to 2030, set out in Policy HO1 B, is informed by the Housing Requirement Study referred to at Paragraph 5.3.11 of the Publication Draft.

1.24.4. Bradford took a strategic decision for the Urban Extension in January 2011 in isolation from strategy of the RSS or the Leeds City Region Partnership, and before it had received the Housing

Requirement Study. It continued to place this decision at the heart of its Core Strategy in the Publication Draft, despite having reduced its housing needs, and it has undertaken no substantive discussions with its neighbouring authorities as to how that decision fits in with the overall strategic development of the City Region.

1.24.5.

At a very late stage (January 2014) Bradford presented its Core Strategy to Leeds at a meeting between portfolio holders. There appears to be no invitation to Leeds to open dialogue on the Plan or to advise Leeds of the Plan's contents or even to seek the views of Leeds after publication of the draft Core Strategy. **It is not the same as co-operation through the plan preparation stages, which is what the Duty to Co-operate requires.**

The effect of large scale green belt release on the separation of the three conurbations (coalescence).

1.24.6. This is clearly inexorably linked to the issue of housing numbers and location. Bradford is saying that it must have the Urban Extension. The only way the Urban Extension can be built is by substantial incursion into the Green Belt. Indeed, as noted above, in Appendix 1 (Ref 1A) of the Background Paper, Bradford links its Duty to Co-operate on housing numbers and location with Green Belt review. At paragraph 3.103 of the Publication Draft it is stated that:

"The Council will seek to work closely with other local authorities in Leeds City Region, City Region partners, and other stakeholders to adopt a strategic approach to any detailed change to the Green Belt."

Appendix 1 (ref 10) of the Background Paper states:

"Core Policy seeks to ensure strategic function of green belt is maintained where revisions are made. Plan seeks to establish green belt boundary for full plan period but given constraints of land supply and other environmental constraints is not proposing to allocate safeguarded land. The Long term extent of green belt will need to be addressed through subsequent plans comprehensively across the City Region."

1.24.7. The duty of co-operation requires close working with other authorities not just in relation to detailed changes in the Green Belt after the Core Strategy has been adopted, but most particularly in relation to the strategic implications of a proposed major change intended to be incorporated in the Core Strategy, such as that required to implement the plans for the Urban Extension, before incorporating that proposal in its Core Strategy. It has failed to do this, and as it has put no other alternative approach into the Publication Draft.

1.24.8. Furthermore the National Planning Policy Framework ("NPPF") Paragraph 83 requires that the Plan should establish Green Belt boundaries. In respect of the Urban Extension, the Plan makes it clear that the Green Belt boundary must change, but makes no attempt to indicate how or where. From the note at Ref 10 of Appendix 1 to the Background Paper it is clear that there is no strategic consensus between authorities as to how the Green Belt should be redrawn, and without such consensus it is premature for Bradford to bring forward a Core Strategy which depends so heavily for its delivery on Green Belt release at HolmeWood.

1.24.9. If Bradford's request to release Green Belt for the HolmeWood Urban Extension is successful, it will lead to a ridiculous situation where there will be a dense and large urban housing estate in the heart of the Tong Valley adjoined for much of its periphery by a thin ribbon of existing Green Belt within neighbouring authorities.

The impact on infrastructure

1.24.10. Highways

1.24.10.1. There will be major adverse consequences for neighbouring authorities resulting from large scale housing on the Bradford boundary. This is recognised in the "CBMDC Local Infrastructure Plan October 2013" (the "Infrastructure Plan") which states at page 49 that *"Highway Agency and the CBMDC Bradford District-wide Transport Study (2010) have highlighted that the planned growth and development in and around these areas will see significant additional demand and impacts on the A650 route to M62 and on the A647 between Bradford and Leeds ring-roads."* and at paragraph 6.2 on page 121 *"It is apparent that upgrades to the transport infrastructure are deemed to be the most important component in unlocking these developments. In light of uncertainties in major transport infrastructure funding, important decisions are required as to the approach on these development sites – with the prospect of phased delivery, allied with smallscale infrastructure improvements seeming more likely in the short to medium term, rather than waiting for major infrastructure investment to take place before any development occurs."*

1.24.10.2. Despite the significant effects on Leeds and Kirklees the only evidence of co-operation on highways infrastructure is the application made by Bradford in March 2013 under the West Yorkshire Plus Transport Fund for funding for *"Highway widening on the A650 to increase capacity at junctions and allow for either a bus lane or a High Occupancy Vehicle Lane from the A650/A651 Westgate Hill Street to Knowles Lane. There are also provisions for an inbound priority lane on Westgate Hill Street east of the A651."* (The high occupancy lane referred to was installed in 2013 and removed before the year was out as being totally ineffective in improving traffic flow or public transport punctuality or usage.) An application was also made in March 2013, following approval by the Council, for an East Bradford Link Road described as *"A new highway link from the A650 to the A6177 in South East Bradford. The route will link to the A651 to North Kirklees and A650 Westgate Hill roundabout. The scheme also involves improving Bowling Back Lane between the A650 roundabout and Sticker Lane. This will provide an alternative route for traffic between Bradford City Centre and Thornbury Gyratory."* Such a route would have required close co-operation with Leeds, as the A6177 at Tyersal runs along the Leeds boundary, and the Thornbury Gyratory feeds traffic from Bradford into Leeds and is currently at capacity.

1.24.10.3. However the Publication Draft contains no reference to this road. Instead it refers at Figure BD1 at page 76 to *"SE Bradford improvements"*, and in presenting the publication draft to Council on 10 December 2013 the Portfolio Holder Cllr Val Slater said that there was "no plan" for an East Bradford Link Road and that access to the new housing would be along the lines of the existing highways.

1.24.10.4. In a response to a written request for information, The Principal Engineer – Transport Planning at Bradford MDC Department of Regeneration confirmed that the East Bradford Link Road had been considered at an early stage "in concept" only. He has said in an e-mail dated 14 February 2014 *"We are now looking at the option for access to potential new development in the Holme Wood area that was identified in the HolmeWood and Tong Neighbourhood Development Plan which provides a route from Westgate Hill Street through the new development to link in to the existing highway network at HolmeWood."* This road proposal is also described as *"in concept"* only and is not proposed to be fully worked up until details of proposed housing allocations in the area are known. This would be a very different sort of road as the route suggested feeds traffic into either narrow rural lanes or estate roads within Holme Wood, neither of which would seem to be realistic concepts

capable of providing access for the volume of traffic which could be expected to be generated by the Urban Extension.

1.24.10.5.

The Sustainability Appraisal Report by AMEC dated October 2013 (the "Sustainability Report") at page 51 that *"the proposed Urban Extension at Holme Wood will help to mitigate the increase in car use"*. AMEC provides no evidence to back this statement, and in view of the location of the proposed sites it is unrealistic to believe the new homes would not rely heavily on motor transport.

1.24.10.6. The only conclusion to be drawn is that Bradford recognises that to be sustainable its Urban Extension is dependent upon material highway works, but it has not yet formulated sufficiently advanced plans to enable it to undertake any meaningful cross-boundary discussions on the knock-on effects, or whether funding may be available, or if so, whether such funding would be sufficient to make the Urban Extension viable.

1.24.11. **The implications for adjoining authorities of large scale housing development on watercourses.**

1.24.11.1. The Publication Draft gives no indication of any co-operation with Leeds MDC or the Environment Agency or Yorkshire Water over the effects of the construction of the originally targeted 2700 houses at the head of the Tong Valley. However the SHLAA document now includes not just the 73.4 acres of land in Green Belt sites 99 & 100 (1800 houses originally but now increased to 1927) but a further 54.1 acres of Green Belt land in site 101 which is available and will become suitable if and when the originally planned sites 99 & 100 are developed. Extrapolating Bradford's published figures this equates to a further 1550 houses but as these sites have no defensible boundaries, natural infill and creep would easily see the total new housing in HolmeWood and the Tong Valley rise from the original 2700 to 4250 including the new site and towards 5000 with infill and creep. The Sustainability Report by AMEC does not give any indication of a clear appreciation that water run-off is a major potential issue. They comment merely, in relation to flood risk and water quality that: *"The Holme Wood area is not located within the floodplain. Notwithstanding this, as an urban extension there is a greater potential for new housing development to impact upon local water quality. As the number of new houses anticipated in the area is nearly double the 2700 originally allocated, the run off/flooding issue increases.*

1.24.11.2. The main watercourse draining the Tong Valley is the Pudsey Beck which becomes the Farnley Beck and joins the Wortley Beck at the Leeds Ring Road (A6110). Along the Pudsey Beck, downstream of the sites of the Urban Extension, are several small pockets of housing, at South Park, Roker Lane and Troydale. Planning Applications for further housing at South Park are currently subject to appeal.

1.24.11.3. Bradford does not seem to have ascertained that all the Green Belt release sites proposed at HolmeWood drain into Leeds and not Bradford, and that housing alongside the Pudsey Beck and Farnley Beck could be affected by flash flooding resulting from surface run-off upstream unless preventative infrastructure is put in place.

1.24.11.4. Where a major strategic development such as that proposed for Holme Wood is to be included in a Local Plan it is incumbent upon the Council to engage in co-operative discussions on foreseeable infrastructure issues, such as flooding.

1.24.12. **Other infrastructure**

1.24.12.1. The Infrastructure Plan indicates that Bradford has considered the implications of the Urban Extension in relation to the fire and ambulance services and that some broad cross boundary discussions may have taken place. However in relation to health and education infrastructure where at present significant numbers of residents from the Tong Ward use NHS services and schools in Leeds or Kirklees there is no indication of cross boundary discussions with the education authorities or the West Yorkshire Commissioning Board.

1.24.12.2. Discussions with utility suppliers do seem to have been undertaken, but it cannot be judged from the disclosed information how detailed these are.

Conclusion

There has been an almost complete absence of co-operation between Bradford and it's neighbouring Authorities.

Furthermore, there is public evidence from the previous Bradford council leader that they had no interest in co-operating and regarded neighbouring Councils with some disdain.

The unique and sensitive geographical, topographical, historical and environmental situation of the Tong Valley would in itself demand a high level of co-operation with neighbouring authorities even without the formal obligations.

The Core Strategy does not meet the legislative requirements in relation to Duty to Co-operate.

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.

Due to the almost total failure to co-operate with neighbouring and other authorities and appropriate bodies regarding the Homewood Urban Extension, all references to the HolmeWood Urban extension and the requirement to release Green Belt in the Tong Valley should be removed.

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:

[Redacted Signature]

Date:

24th 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.

1. Do you live within or have an interest in the Bradford District?

I do not wish to participate in this monitoring exercise

X