

## Core Strategy Development Plan Document

Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012

### Publication Draft - Representation Form

Monday 17<sup>th</sup> February until Monday 31<sup>st</sup> March 2014

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This is your opportunity to comment on the Core Strategy Publication Draft document. The Council would like to hear your views on the 'soundness' of the Plan, legal compliance of the Plan and on the duty to co-operate.

You can access the Core Strategy documents online and additional copies of this form from our website:  
[www.bradford.gov.uk/ldf](http://www.bradford.gov.uk/ldf).

For further information you can contact the Local Plan Group by:

- **Emailing us at:** [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- **Phoning us on:** (01274) 433679

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Please make your representation on this official form that has been specifically designed to assist you in making your representation to cover the matters the Inspector will consider in the report on the plan. A copy of this form will be provided to the Inspector.

This form has three parts:

- **Part A** – Personal Details
- **Part B** – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- **Part C** – Equality and diversity monitoring form

The Council has produced a separate **guidance note** to assist you in making your representation. This contains detailed information on legal compliance, the duty to co-operate and on soundness. You are strongly encouraged to read to this information to make the fullest use of this opportunity.

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Please return this completed representation form to the Local Plan Group by either:

- **E-mail to:** [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council,  
2<sup>nd</sup> Floor South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

**For your representation to be 'duly made' the Council must  
receive it no later than 5pm on Monday 31<sup>st</sup> March 2014**

For Office Use only:			
Date			
Ref			

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#### 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	Heseltine	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Bradford	
Line 4	[REDACTED]	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 30/03/2014

#### 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.

For Office Use only:			
Date			
Ref			

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

**3. To which part of the Plan does this representation relate?**

Section	5	Paragraph	5.3.37	Policy	
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**4. Do you consider the Plan is:**

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

**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.**

The plan proposes an urban extension around the Holme Wood area, including green belt releases. I consider that the process taken to come to this conclusion is based on a number of strategic errors leading to an incorrect conclusion.

Soundness

As a City, Bradford has suffered from decline for many years, with the twin problem of industrial decline and the overpowering growth of neighbouring Leeds drawing off the majority of investment. If you drive into the centre of Bradford now it is striking, perhaps more than any Northern city, how high a proportion of derelict/unoccupied business units there are or unoccupied retail outlets. The level of privately funded redevelopment has for many years been significantly lower than any comparable urban space, and this has resulted in a creeping "doughnut" effect where there is pressure on the boundaries of Bradford for new development while the residential population of the existing central area has stabilised or declined.

This plan, although commendably starting to address this through the Canal Road development, misses an opportunity to continue this for the existing urban centre (permanently underutilised retail space in particular) and the significant tracts of South Bradford within the existing urban perimeter (East Bowling, Tyersal triangle in particular). If these areas were redesignated as urban residential areas, perhaps mixed with new retail/office accommodation, there would be a historic opportunity to regenerate the centre of Bradford and make it a desirable destination for living/business. The developers, constrained to brownfield development, would therefore need to work with the council on clearance/renovation instead of being able to opt for the simpler and less complex task of developing new residential housing on green space and previously undeveloped areas.

I believe that the Holme Wood urban extension proposed will simply create a large tract of new residential space for people who work in Leeds or travel on the motorway network to their normal place of work, at best doing

nothing to assist in the regeneration of Bradford or at worst accelerating its' decline.

## Duty to Cooperate

Having studied the documentation available I can find no convincing evidence that the council has seriously attempted to engage and co-operate with neighbouring councils – Leeds and Kirklees – on the development of the Holme Wood urban extension aspect of their plan. The green corridor between Leeds and Bradford, notable particularly in the area proposed for the Holme Wood urban extension, has been slowly diminishing for a number of years, and this particular extension – so unnecessary in the light of the space existing within Bradford's existing urban boundaries – would have a significantly negative effect on this space. I would expect for something this significant on the boundary between 3 councils, that there would have been significant and meaningful co-operation between the councils, and that the 3 council's development plans would have been recognisably in step on the area of green corridor adjoining the 3 councils. I cannot see any published evidence that this is the case.

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.

Although I have identified the structural weakness of the soundness of the plan for a Holme Wood urban extension, it is difficult on the public information available to me to propose an alternative that achieves the twin aims identified of achieving the necessary urban regeneration of Bradford while protecting the green corridor between Leeds, Bradford and Kirklees Councils. A simple inspection of the urban centre of Bradford and the area around East Bowling/Tyersal identifies unoccupied demolished brownfield sites, derelict industrial and retail premises with a higher acreage than the loss of green space and greenbelt proposed in the urban extension. However, I am not privy to the ownership status of this land, or the degree of contamination in any of the now derelict industrial premises, so it is difficult for me to be definitive in this area. However, I believe that all efforts should be made to create additional housing within this existing boundary before any incursion in a shared green corridor is made.

**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?**

X

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:**

30/03/14

## 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.**