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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	Reverend Canon	
First Name	[REDACTED]	
Last Name	Dey	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	Bradford	
Line 3		
Line 4		
Post Code	BD9 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 28 th 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	3,4 & 5	Paragraph	Key Diagram –Location Strategy and Key page 66/7, 4.1.3, 5.3.22, 5.3.34, 5.3.35, 5.3.37, 5.3.42, 5.3.61, Appendix 6 Table 1 page 358, Appendix 6 Paragraph 1.9 Page 363	Policy	Sub-Area Policy BD1 C 1., Sub- Area Policy BD2 E and Policy HO2 B 2.
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (2). Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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.

I wish to challenge Bradford Council's satisfying of the 'Duty to Co-operate' requirement that should have applied to the method of producing the Core Strategy of the Plan. I do so having been Vicar of Tong and Holme Wood from 1985 to 2011, and Chair of the Tong and Fulneck Valley Association – a position I still hold. My comments therefore relate to that part of the Core Strategy that is proposing an Urban Extension to Holme Wood with consequent loss of a large swathe of countryside that currently enjoys Green Belt protection.

1. SUMMARY OF CONCERNS

- a) **LACK OF EVIDENCE** Why is there no evidence in Bradford Council's Draft Core Strategy that demonstrates how it has tackled its 'duty to co-operate', identifies those with whom it has co-operated, and clarifies what this has achieved? Why does Bradford appear to attach so little value to this particular requirement?
- b) **GREEN BELT RESPONSIBILITY** – why is there such little recognition in Bradford's Core Strategy that the Green Belt that separates local authorities requires even greater expectation and evidence of good co-operation and agreement? Why is there no sign of Bradford taking the initiative to collaborate with Leeds and Kirklees in view of its far-reaching intention to re-draw the boundary of the Green Belt?
- c) **CONFLICT WITH LEEDS** – Why did Bradford respond with such hostility to Leeds' Objections at the Further Engagement Draft stage, and in their challenging of the Holme Wood and Tong Neighbourhood Development Plan? Why did Bradford not seek to work collaboratively when Leeds had been forced to flag up and oppose the damaging 'gung-ho' ambition for such a vast Urban Extension for Holme Wood?

2. LACK OF EVIDENCE OF CO-OPERATION

I am assuming that the opportunity to challenge Bradford Council's fulfilment of a 'Duty to Co-operate' should derive from opportunity to scrutinise evidence of Bradford's performance in this area. I can find almost nothing that gives me this opportunity in the documentation that has been produced. I suspect that Bradford may be approaching this on a 'no news is good news' basis, and that it is sufficient for them to fulfil this requirement at a later stage. My reading of the situation is that there should have been far greater explicit evidence of Bradford fulfilling this throughout the process that has been taking place over the past few years.

3. GREEN BELT RESPONSIBILITY

My reading of the latest planning legislation is that any redrawing of Green Belt boundaries should be a 'last resort', and require agreement and good co-operation between neighbouring authorities where the Green Belt has a role in separating their communities, as applies in the Tong Valley. It is clear that Bradford has been determined to enforce the elimination of a huge swathe of green belt in the Tong Valley. This land forms part of the 'Tong Peninsula' which constitutes a most unusual triangle of land that penetrates deep into Leeds territory, and is surrounded by land under Leeds' jurisdiction. Leeds MDC was therefore entirely justified in objecting to Bradford's plans at the previous Further Engagement Draft

stage. Sadly Bradford Council reacted angrily and negatively to this intervention whereas this should have led to proper resolution and common purpose.

I am particularly conscious of this geographical feature because it forms the boundaries of the ecclesiastical Anglican Parish of Tong and Holme Wood of which I was Vicar, in addition to being the manorial boundary of the ancient Manor of Tong. St James Church in Tong, grade one listed, contains pre-Conquest features, and the village in which it is set is hugely important as a Conservation Area, and a key heritage feature for Bradford. Across the Tong Valley, and overlooking it, lies the important Fulneck Settlement with its unique Moravian history and heritage features. The presence of these two highly sensitive and historically important communities enhances even more strongly the necessity for good co-operation between Leeds and Bradford MDC's.

I was Vicar of Tong from 1985 to 2011 – twenty six years. In my early years there was a splendid scheme known as the Tong Cockersdale Countryside Management Project, that was jointly funded by Leeds and Bradford, and demonstrated their joint commitment and goodwill to protect and enhance this attractive and historically significant landscape. Sadly all this came to an end, and my perspective is that since then Bradford Council has steadily devalued its estimation of this important countryside and Conservation Area, whereas Leeds MDC, despite having less of the local countryside to protect, has tried hard to sustain its responsibility through the establishing of 'Green Gateways' West Leeds Country Park.

The important thing to recognise is that this is land that requires high quality collaboration between the two authorities. It is countryside that can increasingly offer a great deal to residents of these two massive urban conurbations. The long term benefit of delightful countryside coupled with high quality recreational opportunity that is 'on the doorstep' of both authorities must be safeguarded by a common approach that captures a common vision, and sets achievable goals. It must also not be massively reduced in size by the proposal to create a Holme Wood Urban Extension that would cut a deep wound into this countryside, and almost certainly leave a widening opportunity for even further later incursions into the Green Belt. Whilst all this has been recognised by Leeds MDC – hence their objections – it is not being in any way reflected in Bradford's strategy.

4. CONFLICT WITH LEEDS MDC

The Green Belt described above requires and deserves common agreement and mutual protection as indicated. Sadly it has led to unfortunate hostility between the two authorities, and has apparently led to an almost complete absence of common agreement over Bradford's housing expansion intentions with regard to the Tong Valley.

The detail of this conflict is spelt out in the Representation regarding the 'Duty to Co-operate' requirement that has been submitted by the Tong Fulneck Valley Association, of which I am the Chairperson, and to which I warmly subscribe.

5. SUMMARY

My understanding is that Bradford has had a Duty to Co-operate throughout the preparation and

formation of its Core Strategy. The evidence of this having been responded to is minimal, and yet conversely, the failure to find common purpose with Leeds, and to a lesser extent with Kirklees is all too apparent. If this had been in place it is likely that a very different plan would have emerged for the Tong Valley. It is likely that such a plan would have been to the very much greater long term benefit of present and future residents of both cities.

- 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.

If the Inspector finds that the plan has been formed without fulfilling the Duty to Co-operate' expectations that are required by the legislation this will need to be put in place before the Core Strategy can be represented.

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:

So that further detail of my submission can be given, and queries can be clarified.

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:

28th March 2014