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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 and 5	Paragraph	<p>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</p>	Policy	<p>Sub-Area Policy BD1 C 1., Sub- Area Policy BD2 E and Policy HO2 B 2.</p>
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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 checked="" type="checkbox"/>
4 (3). Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input 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 the Soundness of Bradford Council's Core Strategy to its Local 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 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.

I request that the Inspector considers the following issues:

1. SUMMARY OF CONCERNS

- a) **NOT POSITIVELY PREPARED** Why is there so little evidence of Bradford Council having anticipated and forecast the major infrastructure requirements that would be needed to ensure the sustainability of the new community created by the Holme Wood Urban Extension community? Why is there such confusion regarding highway provision plans that relate to the proposed Urban Extension? Why is there no recognition of the threat that the new development will pose to Holme Wood? Why has Bradford Council not concentrated its housing requirements in areas where rail travel exists and can be expanded? Why does Bradford Council not recognise that a long term priority to unite its two railway stations would bring huge economic and employment benefits?
- b) **NOT EFFECTIVE** – Why is this large scale green belt release described as a 'Holme Wood Urban Extension' when it is clear that it will be an entirely separate community to Holme Wood? Why is there no appreciation of the deep social damage that this new development could bring to Holme Wood? Why is there so little evidence of 'cross-boundary' working over countryside that has important potential for both Leeds and Bradford? Why are not Bradford and Leeds working together on the formation of a Country Park that would benefit residents of both authorities?
- c) **NOT JUSTIFIED** – Why has Bradford Council been so determined from a very early stage to rape the Tong Valley countryside? Why, at the Options Stage, did it produce two alternative plans to the earlier UDP and RSS schemes, both of which included for an Urban Extension to Holme Wood? Why has Bradford produced a plan for housing development in the Tong Valley that is so hugely disproportionate in the housing growth it projects? Why, when Bradford had heavily reduced its housing target did it not identify Green Belt land in the Tong Valley as its first reduction priority? Why is Bradford Council acting so irresponsibly in failing to protect highly sensitive Green Belt land in the Tong Valley? Why is Bradford not focusing on using the Local Plan opportunity to regenerate the poverty of Bradford City Centre?
- d) **NOT IN LINE WITH NATIONAL POLICY** – Why is there so little evidence of Bradford Council's priority for maintaining Green Belt protection? Why is there no evidence in the Core Strategy of the Council identifying and affirming the reasons that should determine the establishing and maintaining of the Green Belt? Why have Bradford, Leeds and Kirklees Council's not been collaborating to define and agree future green belt boundaries? Why has Bradford Council not been more committed to enhancing and promoting the recreational potential of the Tong Valley Green Belt in partnership with Leeds MDC? Why has Leeds MDC had to work independently on developing the Leeds Country Park initiative? Why is there a complete disregard in the Core Strategy for ensuring that any redrawing of the Green Belt boundary will ensure sound defensible boundaries are identified and applied? Why is there so little appreciation in the Core Strategy of the highly significant and complementary heritage communities of Tong in Bradford and Fulneck in Leeds?

2. NOT POSITIVELY PREPARED

'House-dumping' is a crude term to use in a submission of this kind, but it adequately reflects my view and the view of many in the local community (as evidenced by a petition signed by over a thousand people that opposed the Core Strategy Further Engagement Draft)) that Bradford Council's identification of the Tong Valley for such a huge Urban Expansion is inadequately prepared and presented. It is inconceivable that such a huge expansion of housing could have been similarly projected for other areas of Bradford District where local political reaction and response to such a plan in such areas would have been deeply challenging and forensic, and it is unacceptable that they should attempt to behave in this way in a community where they can expect much less political opposition.

The so-called Tong and Holme Wood 'Neighbourhood Development Plan' – the legality of which I query in a separate Representation – is extraordinary unbalanced. It shows detailed interest in making improvements to Holme Wood in areas that are little more than cosmetic, but plans for an Urban Extension to Holme Wood in a way that fails to project the substantial infrastructure implications and requirements that such a massive development would present. Nor does the NDP or the Core Strategy acknowledge that this would have heavy impact upon neighbouring authorities, and especially upon Leeds MDC.

This is particularly the case with regard to consequent highway requirements. There is confusion in Bradford's Plan as to how the new community would be accessed. The two options seem to be:

- a) An 'access road' that would begin at the end of the Drighlington bypass, and run through the new development to a point where it would meet Holme Wood at Raikes Lane/Holme Lane. If this option was adopted it is clear that the weight of traffic that would be discharged into the estate roads of Holme Wood would be totally unacceptable. I well recall a time in the 1980's when Broadstone Way – the main arterial road through the Holme Wood estate – had the worst traffic accident record in West Yorkshire, and where the number of child related collisions was horrendous. To create the conditions in which this threat was reintroduced cannot be allowed to take place.

Moreover the principle behind such a proposal needs investigating. If the main new access road to the new community is identified as being from the end of the Drighlington bypass, how can this be benefiting the economic fortunes of Bradford – and indeed what does this anticipate regarding the area from which people will be drawn to purchase such new properties? It is already true that the majority of residents who purchased properties in the recently built Mossdale estate did not originate in Bradford, but mostly came from Leeds or Kirklees. This would be even more the case with regard to the Urban Extension – particularly if the main access road were to be from the Drighlington bypass. The development would therefore have little effect in meeting Bradford's housing needs, and has therefore not been positively prepared to meet this need.

- b) A new major highway 'Link Road' that would extend from the end of the Drighlington bypass to Thornbury. Bradford has already projected this as a preferred option through a speculative application to the West Yorkshire Transport Plus Fund. It did so without recognising that a major section of this road would run through Leeds territory – indeed the portfolio holder had to apologise to

Leeds MDC for having overlooked the need to collaborate with Leeds in envisaging such a road. There is still no sign of Bradford and Leeds finding any kind of agreement regarding this projected new highway.

It may well be that there is substantial pressure from housing developers for such a road to be constructed, as the value of any new housing would rise steeply if such a road enabled apparently easy access to Leeds and Kirklees, and in particular would enable them to disassociate their new housing with Holme Wood. It would however clearly bypass Bradford, and so do little to improve Bradford's economic and commercial potential.

More seriously it would further threaten the Green Belt protected countryside of the Tong Valley. Indeed the figures currently projected in the current Core Strategy could be the 'thin end of a wedge'. It may well be with this in mind that Bradford has included without explanation Site SE101 in its SHLAA map – a site that would enable a further large housing development to take place in addition to the current total projected number of 2,700 new homes.

My main concern is for the Tong Valley and the communities that would be affected by the Core Strategy. However I am also concerned about the overall wisdom of a plan that would inevitably require major increases in road traffic in a city that has been identified as the 3rd most congested city in Britain. The need therefore to ensure that housing growth, employment opportunities and consequent economic prosperity are projected in a way that facilitates and encourages rail links and dependence seems to me to be paramount

Bradford's economic fortunes have suffered greatly in recent years from a failure to 'think holistically', and sustain such thinking through well conceived and consistently managed plans. Too frequently Bradford Council has 'half-done' things. Examples of poor traffic management include the bizarre way in which the A650 dual carriageway terminates at Dudley Hill, or the M606 terminates at the Bradford Ring Road. More recently the City Centre 'Hole' that has had to be endured for far too long by Bradford residents after the demolition of 1960's city centre shopping facilities has created a vacuum of hope and loss of respect for Bradford as a city, resulting in the retreat of so many important retail outlets and commercial firms and businesses, many of them moving to Leeds.

The Core Strategy brings a key opportunity to reverse this, and it seems to me that one of the most important challenges relates to better rail provision. Whilst the unification of Bradford's railway stations would present a real logistical and financial challenge, the effect of such a step to reverse current commercial and economic trends and conditions would be substantial. So far as the Holme Wood Urban Extension is concerned, this plan should therefore be scrapped in favour of identification of sites that would be much more rail dependant.

3. NOT EFFECTIVE

It is clear that the scale of the new development makes the use of the title 'Holme Wood Urban Extension' a misnomer. Holme Wood is one of the most heavily disadvantaged communities in Bradford, and yet a great deal of very impressive work by statutory and voluntary groups and agencies continues to impact and benefit those who live there. The Tong and Holme Wood Partnership Board began its work

with the simple vision of working to enable a more socially mixed community to emerge in Holme Wood, and the 900 additional homes that are projected in the Core Strategy reflect some of this earlier aspiration. The work of the Board was then effectively hijacked by Bradford Council's determination to 'house dump' in the Tong Valley. Such a plan will be deeply damaging to attempts to 'improve' Holme Wood – a priority that should be a major feature of Bradford's urban regeneration planning. Any claim that Holme Wood can somehow 'include' this new Urban Extension is fanciful.

It is also clear that Bradford has failed to sustain earlier attempts to work in partnership with Leeds MDC in the development and enhancing of the Green Belt countryside potential of the Tong and Fulneck Valley. I well recall the success of the Tong Cockersdale Countryside Management Scheme that was jointly managed and funded by both authorities in the 1980's. The enhancing of footpaths, repair of walling and general protection and improvement of the countryside through collaborative work with local farmers and local organisations was a fine example of multi Council partnership. The need for such collaboration is very clearly demonstrated by the unusual geographical boundary whereby Bradford's 'Tong peninsula' cuts so deeply into Leeds MDC territory and is therefore largely surrounded by land that is under Leeds jurisdiction. Sadly Bradford unilaterally pulled out of this scheme, and in doing so severed any partnership with Leeds for joint working in the Tong Valley green belt protected countryside. I would suggest that this has reflects an attitude in Bradford Council that betrays a minimal appreciation of the heritage and recreational value and potential of this 'jewel in its crown'.

Leeds has since sought to maintain and further enhance its area of countryside that Bradford has so sadly ignored by the creation of its 'Green Gateways' Leeds Country Park. It is so very unfortunate that this has had to be done unilaterally, as this ignores and further damages the essential integrity of the Tong Valley in Bradford with Cockersdale and Fulneck in Leeds.

4. NOT JUSTIFIED

The plan is not justified for the following reasons:

- a) The crude claim that it would generate finance to enhance the regeneration of Holme Wood is unsustainable. Any finance generated will be needed to build the infra-structure that the extensive new Urban Extension housing development will require, and in any case Holme Wood's needs primarily require on-going social regeneration investment, not cosmetic tinkering.
- b) The loss of such a huge swathe of Green Belt protected countryside is not justified. There can be few other places in the Bradford District where the five purposes that justify green belt protection being established are so comprehensively and vitally demonstrated.
- c) There are other options available to Bradford. In particular the opportunity to review the scale of housing that could be achieved in the city centre needs revisiting. Bradford is sadly 'ahead of the game' in the effect that new shopping patterns and habits are having upon traditional retail outlets. The speed of growth of charity shops, pawn shops and pound shops, and the littering of the city with 'TO LET' signs are all evidence of this. It has also had to cope recently with increasing emigration of businesses and commercial companies. The opportunity therefore for Bradford to spearhead a fresh and adventurous path towards repopulation of its city centre may be a task that will model change for

many UK cities in coming years. Such a step will require adventurous conception and planning, but could help to bring about a 'sea-change' for future housing growth and economic prosperity.

- d) There are other sites that have not been included in the SHLAA that are much more suitable. Whilst it has not been possible for us to 'survey Bradford' there are certainly sites in Bradford 4, particularly in the Bierley area, that have been curiously ignored. This is a further indication that Bradford Council, rather than viewing green belt release as a last and least attractive option, has opted for development in the Tong Valley far too prematurely and with far too much passion and conviction.

5. NOT IN LINE WITH NATIONAL POLICY

I've already touch upon issues that relate to this. It seems to me that of all the concerns that are emerging regarding the Soundness of Bradford Council's plans for the Tong Valley, this is the most flagrant and unacceptable.

Why is there so little evidence of the Council's priority for maintaining Green Belt protection and why is there no evidence in the Core Strategy of the Council identifying and applying the reasons that exist for establishing and maintaining the Green Belt?

It seems to me that the conditions that must underlie the formation of a Green Belt – i.e.

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

are all relevant to the need for such protection to be given to the Tong Valley and Westgate Hill. Furthermore many of the expectations in such legislation seem to have been totally ignored – particularly the need to consult with other authorities such as Leeds MDC before projecting any change to the Green Belt boundaries. It is as though Bradford in its attitude to this countryside is treating it as though Green Belt expectations can be ignored and dealt with in a casual and cavalier manner.

It also seems to be the case that the ensuring of future secure boundaries to the Green Belt has also been disregarded. The failure to recognise need to establish defensible boundaries to the Green Belt at Westgate Hill and the Tong Valley is unbelievable, as is also the requirement that the Green Belt must be drawn in a way that extends beyond the period of the current Local Plan.

I have already drawn attention to the important settlements of Tong and Fulneck, and would request that the Inspector pays close attention to the exceptional heritage value that these offer to Bradford and Leeds, and more widely. The countryside that surrounds them is an inheritance that is derived from ancient times which, in the case of Tong, stretches right back into the Anglo Saxon period. The Tempest family who inhabited Tong Hall managed the Manor of Tong, the boundary of which was largely co-terminus with the current Metropolitan boundary between Leeds and Bradford. These settlements have the capacity to offer a great deal more to these vast neighbouring conurbations, and it would be crazy to damage this potential with the scale of housing development that Bradford is proposing.

I urge the Inspector to recognise that Bradford's plan to establish what it describes as a Holme Wood Urban Extension, but which I again suggest is little more than crude 'house dumping', is thoroughly unsound, and I would request that the 1800 homes projected as the Holme Wood Urban Extension is entirely removed from the Core Strategy of the Local Plan. I do not however oppose the proposal in the Plan that would lead to 900 new homes being built within the curtilage of Holme Wood or within the current natural boundary that is bordered by Holme Lane and Ned Lane. Such a number would be much more proportionate in the context of the Core Strategy and its attempt to meet Bradford's future housing requirements

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 is not sound, as this submission requests, then all references to the creation of a Holme Wood Urban Extension would need to be removed, and the plan to build 1800 new homes across Westgate Hill and into the Tong Valley would need to be terminated. However the building of 900 new homes within Holme Wood or within a defensible Green Belt boundary formed by Holme Lane and Ned Lane could be retained.

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:		Date:	28 th March 2014
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