

City of Bradford Metropolitan District Council

Core Strategy Development Plan Document

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

Publication Draft - Representation Form

Monday 17th February until Monday 31st March 2014

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

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

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

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:

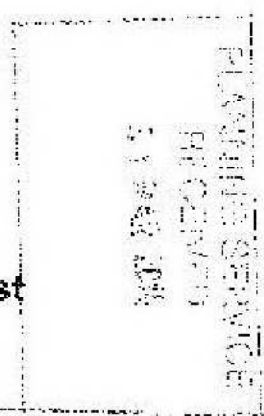
- **Part A** – Personal Details
- **Part B** – Your Representation(s). *Please fill in a separate sheet for each representation you wish to make.*
- **Part C** – Equality and diversity monitoring form

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.

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

- **E-mail to:** ldf.consultation@bradford.gov.uk
- **Post to:** Local Plan Group, City of Bradford Metropolitan District Council, 2nd 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 31st March 2014



City of Bradford Metropolitan District Council

For Office Use only.

Date
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Core Strategy Development Plan Document

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

Publication Draft - Representation Form

RECEIVED
31 JAN 2014

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	Mrs	
First Name	[REDACTED]	
Last Name	Mackenzie	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	Bradford	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 30/1/14

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	Paragraph	Policy
3,	Key Diagram – Location Strategy and Key Page 66/7, 4.1.3,	Sub Area Policy BD 1 C.
4,	5.3.22, 5.3.34, 5.3.35, 5.3.37, 5.3.42, 5.3.61,	Sub Area Policy BD2 E.
5	Appendix 6 Table 1 Page 358 Appendix 6 Paragraph 1.9 Page 363	Policy HO2 B 2.

4. Do you consider the Plan is:

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

4 (2). Legally Compliant?

I do not consider the plan to be legally compliant because of the following reasons (representations)...

1) There has been a **FLAWED** consultation process due to the Tong and Holme Wood Neighbourhood Development Plan (NDP) and the Local Development Framework Core Strategy Further Engagement Draft (LDF FED) not being available for public consultation running **IN PARALLEL**. In fact the NDP process began and was **COMPLETED** in advance of the LDF FED. This indicates that clearly the NDP was driving the policy of the LDF FED rather than being driven by it.

2) There has been an inaccurate and misleading designation of the Tong and Holme Wood Neighbourhood Development Plan. The Localism Bill sets out a clear framework for the formation of NDPs which the Tong and Holme Wood NDP fails to meet. No attempt was made by Bradford Council to reshape the Tong and Holme Wood Partnership Board so that it met the requirements of the Localism Bill in devising an NDP. The Draft Core Strategy refers frequently to the Tong and Holme Wood NDP in a way that assumes validity for it that should not be claimed.

4 (3). Duty to Co-operate?

I do not consider the plan to comply with the duty to co-operate because of the following reasons (representations) ...

- a) There has been a failure of the Core Strategy to show how the 'Duty to Co-operate' has been approached and fulfilled. There appears to be no documentation in Bradford's draft that identifies those with whom it has co-operated, how this has been done, and what has been achieved through the process.
- b) There has been a failure to co-operate with Leeds MC. There is no sign of any committed and sustained cooperation between Leeds and Bradford despite the sensitive geographical adjacency of the green belt protected land that separates them. Leeds Council's objection to both the Long and Holme Wood NPP and to the Core Strategy LDF FED and Bradford's hostile response exposes a failure to achieve this. The Core Strategy fails to identify the process.
- c) There has been a failure to co-operate with public bodies. We can find no evidence of co-operation with health authorities and water companies despite the increased health care challenges that would ensue from the Urban Extension, and the increased flood risk that would be brought to Pudsey Beck and Troysale.

4 (2). Soundness?

I do not consider the plan to be sound because of the following reasons (representations)...

f) It has not been positively prepared. The plan should be prepared based on a strategy, which seeks to meet objectively assessed development and infrastructure requirements.

a) Infrastructure Requirements: There is no attempt in either the NDP or the Core Strategy to show how any of the infrastructure requirements of such a large new community - for it to be sustainable - would be met. The development would have significant impact upon both Leeds and Kirkstall, but there is no sign of this being recognised and planned for.

b) Effect on Holme Wood: To describe the new development as a 'Holme Wood Urban Extension' is misleading. Holme Wood does not have the infrastructure capacity to 'take' or provide for a development of this scale. We believe that the main bulk of this new development will not assist Holme Wood to become a more socially and economically mixed community, and may well further damage its potential. In contrast I and the Tong and Falshaw Valley Association of which I am a member, would be in favour of plans to build 800 new homes within the current natural boundary of the estate.

c) Transport and Traffic Concerns:

i) Congestion: Bradford has been assessed as the third most congested city in the UK and traffic surveys have shown that Tong Street (A650) is the most congested road in Bradford. To build such a VAST new housing development that will inevitably lead to further congestion on Tong Street is foolhardy. I can personally vouch for this because I have lived on the Westgate Hill Street section of the A650 for almost 7 years and am a regular commuter through Tong Street at varying times of the day.

ii) Road Provision: There is confusion about Bradford's intentions regarding road provision for the Urban Extension. There is conflicting evidence regarding a proposal to build a new highway link road from Westgate Hill to Thornbury, or to only provide the new community with an access road. If it were only an access road, the effect of traffic growth through Holme Wood would be unacceptable. If a link road were to be built there would be even further devastating greenbelt loss, and serious ecological threat to the important ancient woodland of Black Carr Woods. Such a road would require agreement and support from neighbouring authorities.

iii) Rural Roads: The rural lane roads that lead to Tong or Tyarsal are entirely unsuited to carrying the increased traffic that would result from the Urban Extension, and further potential traffic increases in Tong Lane through the Tong Conservation Area would be highly undesirable.

2) The Plan is not justified. The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportional evidence.

a) Green Belt Breach. The loss of Green Belt PROTECTED LAND should not take place unless there is no alternative, yet we do not see any sign of this having been a priority with those who are making these proposals. Indeed the prior inclusion of this in the NDP indicates a lack of genuine commitment to green belt protection by Bradford Council. Thus the direct consequence of this lack of commitment is a serious

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plthora of wildlife I have personally witnessed in this area such as crows, sparrow hawks, linnets, woodpeckers, owls, long tailed tits and a wide variety of other bird species. Not to mention the rabbits, foxes and other animals that inhabit this Greenbelt Protected Area. A Hen Harrier has also been sighted. Without the habitat these species are under serious threat and very likely will die out. This is an issue that the RSPB are seriously concerned with hence the surveys and investigative work they are carrying out nationwide at the time.

b) *no Greenbelt Policy.* We are not aware of Bradford Council having produced a Green Belt policy that has a cogent strategy for the redefining of greenbelt - nor are we aware of any negotiation taking place with neighbouring authorities to reach common agreement on this.

b) *The plan is not effective.* It should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

a) *Cross Boundary:* There is no sign of any cross-boundary agreement for the Urban Extension despite the substantial social and economic implications that such a development would have for Leeds and Kirkstall.

b) *Time Scale:* There is no clear time frame given for the Urban Extension, and there are conflicting statements made in council documents that indicate confusion as to how and when land for the Urban Extension would be released.

A) *The plan is not consistent with national policy.* The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

a) *Green Belt Protection:* All of the land that we are concerned about currently enjoys Green Belt Protection. The National Planning Policy Framework (NPPF) requires the same high level of protection to the Green Belt as in the previous Unitary Development Plan (UDP), and identifies five purposes served by the green Belt. The Core Strategy does not reflect the importance of these - indeed they are not mentioned in the document, and nor does it reflect any clear commitment for minimising Green Belt releases.

Each of the following Five Purposes will be COMPROMISED by the proposed Urban Extension at Holme Wood:

b) *Prevent Spread of Urban Sprawl:* The Green Belt currently controls effectively the growth of urban sprawl between both Tong and Holme Wood, and between the Metropolitan Districts of Bradford, Leeds and Kirkstall. In particular the boundary to the Green Belt provided by Westgate Hill Street, Holme Lane and Nod Lane is adequate and defensible. The proposed sights and boundaries identified on the SHLAA plan for the Urban Extension are arbitrary and largely indefensible.

a) *Prevent merger of Neighbouring Towns:* The Green Belt provides a VITAL COUNTRYSIDE LUNG between the neighbouring authorities. The threat of coalescence between Bradford and Leeds was a key reason for the objection to the UDP and PEG by Leeds Council. The threat of such coalescence has

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increased in the current plan with the inclusion of site SE101.

iii) Safeguard the countryside from encroachment: the current boundaries enable the preservation of important countryside opportunities in the Tong Valley for residents of Bradford, Leeds and Kirkstall. The Tong and Fulneck Valley Association is committed to working with others to see this enhanced for future generations. I am also committed to seeing this enhanced because I desire to see my 13 month old son grow up to enjoy the Tong and Fulneck Valley Countryside Environment with its wildlife and habitats. Bradford Council's concept of a major new highway to be constructed between Westgate Hill and Thornbury would further DESTROY important countryside forever, and threaten the ancient woodlands at Black Carr Woods.

iv) Preserve the setting of Historic Towns.

Tong and Fulneck: The ancient and historic communities of Tong and Fulneck and the recreational benefits that they offer to the substantial number of visitors who benefit from them require strong maintenance of the protection currently secured by the Green Belt land that surrounds them. Both are rightly identified as Conservation Areas, and both offer unique historical and cultural attraction within the largely urban life of West Yorkshire. Fulneck became the key settlement of the Moravian Community in the 15th Century, and has retained much of its unique character. Tong is included in the Domesday Book; Tong Hall is a Grade One listed Queen Anne building; Tong Church is also Grade One, has Saxon and Norman origins, and has original 15th Century fittings and furnishings from the rebuilt in 1727 by leading Methodist preacher, John Nelson. Tong Village has a wide range of other listed buildings and features.

v) Recycling of Derelict and other Urban Land: The need to give priority to brown field and other derelict sites has been a consistent and universal message from a wide range of politicians and campaigners in Bradford. However the challenges that exist in tackling this can motivate housing developers to seek access to alternative countryside sites that are more attractive and profitable to develop. The need therefore to maintain for the Tong Valley is vital to ensure that the substantial areas of Bradford land that needs regeneration is given priority.

6) The Plan is not positively prepared, justified or flexible (see detail of those above).

This representation relates specifically to the failure of the Plan to recognise the special landscape character of Tong Valley in SE Bradford, the historical significance of the area and of the Conservation Area comprising Tong Village and the place of the Tong Valley and Tong Village in relation to the historic Moravian settlement and Village of Fulneck (part of Leeds MDC).

I ask for revision of the Plan to recognise those features as well as the cultural, recreational and leisure potential of the area and to make it clear that Tong Valley will be included in proposals for a Leeds Bradford Country Park.

I also ask for the correction of an apparent error in Policy EN6

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I strongly believe that the Tong Valley is an immensely valuable recreational and leisure asset for Bradford with important historical associations. Bradford has in the past paid little attention to these important areas, first by selling Tong Hall, then by pulling out of the Tong Cookersale Partnership and now by proposing that the area should be the site of an Urban Extension. I feel that this position should be rectified by the positive statements in the Core Strategy that I am suggesting should be introduced and that real vision should be displayed now for its future.

6. Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the text 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.

All references to the Urban Extension on the plan at page 67, as Policy B01 C.1 (page 70), Paragraph 4.1.3 (outcomes by 2030) (page 64), sub-area policy B02 C (page 79) Paragraph 5.3.24 (page 160), Paragraph 5.3.34 (page 161), Paragraph 5.3.36 (page 162), Paragraph 5.3.37 (page 162), Policy H02 S 2 at Paragraph 5.3.37 (page 163), Paragraph 5.3.42 (page 164), Paragraph 5.3.21 (page 159), Table 1 to Appendix 5 at Page 358 and Appendix 5 paragraph 1.9 (page 363) should be deleted and the reference to the target number of 3000 in respect of S8 Bradford at Paragraph 5.3.38 amended to 2,000 (reflecting the 2100 homes envisaged by the UDP to be constructed in a green belt release at Adams Wood) with the 2100 added as appropriate to other sector allocations either in the Regional City of Bradford or the Wether District, and a statement included in Paragraph 3.102 (or elsewhere if appropriate) recognising the need to retain the Green Belt in the Tong Valley.

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:

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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:

30/3/14

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.

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

Yes



No

I have an interest