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# City of Bradford Metropolitan District Council

## Core Strategy Development Plan Document

Regulation 23 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

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.

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

- **Emailing us at:** [planningconsultation@bradford.gov.uk](mailto:planningconsultation@bradford.gov.uk)
- **Phoning us on:** (01274) 433879



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:** [planningconsultation@bradford.gov.uk](mailto:planningconsultation@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**

# City of Bristol Municipal District Council

Form No. 100 (Rev. 1/01)

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

\* PLEASE SEE SEPARATE ATTACHED SHEET

4. Do you consider the Plan is:

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

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 IS NOT LEGALLY COMPLIANT BECAUSE THE CONSULTATION PROCESS WAS FLAWED. THE TONG AND HOME WOOD NEIGHBOURHOOD DEVELOPMENT PLAN (NDP) AND LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY DRAFT ENGAGEMENT DRAFT (LDF-ED) THESE TWO WERE SUPPOSED TO BE AVAILABLE FOR PUBLIC CONSULTATION THAT WAS RUN IN PARALLEL, WHEREAS THE NDP PROCESS BEGAN AND WAS COMPLETED IN ADVANCE OF THE LDF-ED, INDICATING THAT THE NDP WAS DRIVING THE PRIORITY OF THE LDF-ED RATHER THAN BEING DRIVEN BY IT. THERE WAS INADEQUATE AND MISLEADING DESIGNATION OF THE TONG AND HOME WOOD NEIGHBOURHOOD DEVELOPMENT PLAN. THE LOCALISM BILL SETS OUT A CLEAR FRAME WORK FOR THE FORMATION OF NDP WHICH THE TONG AND HOME WOOD NDP FAILS TO MEET. NO ATTEMPT WAS MADE BY BRISTOL COUNCIL TO RESHAPE THE TONG AND HOME WOOD PARTNERSHIP BOARD SO THAT IT MET THE REQUIREMENTS OF THE LOCALISM BILL IN DESIGNING AN NDP. THE DRAFT CORE STRATEGY REFERS FREQUENTLY TO THE TONG AND HOME WOOD NDP IN A WAY THAT ASSUMES VALIDITY FOR IT THAT SHOULD NOT BE CLAIMED.

For Councillors 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?

Sections	3  4  5	Paragraphs	Key Diagram –Location Strategy and Key page 66/7  Figure BD1: Spatial Vision Diagram  4.1.3  5.3.22 5.3.34 5.3.35 5.3.37 5.3.42 5.3.61  Appendix 5 Table 1 page 358 Appendix 6 Paragraph 1.9 Page 363	Policies	Sub-Area Policy BD1 C 1.  Sub-Area Policy BD1 E 1.  Sub-Area Policy BD2 E  Policy HO2 B 2.  Policy EN4 A
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4. Do you consider the Plan is:

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

## Core Strategy Development Plan Document

Regulation 22 of the Town & Country Planning (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

INSKIP

Job Title

(where relevant)

[REDACTED]

Organisation

(where relevant)

[REDACTED]

Address Line 1

[REDACTED]

Line 2

[REDACTED]

Line 3

BRADFORD

Line 4

[REDACTED]

Post Code

BD4

Telephone Number

[REDACTED]

Email Address

Signature:

Date:

MARCH 28<sup>th</sup> 2014

#### Personal Details & Data Protection Act 1996

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.

**City of San Jose Planning Department**

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 AT POLICY BD1 C1 (PAGE 73) PARAGRAPH 4.3 (OUTCOMES B7 2030) (PAGE 64), SUBAREA POLICY BD2 E (PAGE 79) PARAGRAPH 5.3.22 (PAGE 158), PARAGRAPH 5.3.4 (PAGE 161) PARAGRAPH 5.3.35 (PAGE 164) PARAGRAPH 5.3.37 (PAGE 162) POLICY HD2 B2 AT PARAGRAPH 5.3.37 (PAGE 163), PARAGRAPH 5.3.42 (PAGE 164) PARAGRAPH 5.3.61 (PAGE 169), TABLE 1 TO APPENDIX 6 AT PAGE 358 AND APPENDIX 6 PARAGRAPH 19 (PAGE 363) SHOULD BE DELETED AND THE REFERENCE TO THE TARGET NUMBER OF 6000 IN ASPECT OF S.E. BOUNDARY AT PARAGRAPH 5.3.35 AMENDED TO 3,900 (REFLECTING THE 2,100 HOMES ENVI SAVED AT THE N.D.P. TO BE CONSTRUCTED IN A GREEN BELT AREA AT HILLINGWOOD) WITH THE 2,100 ADDED AS APPROPRIATE TO OTHER SETBACK ALLOCATIONS EITHER IN THE REGIONAL CITY OR BOUNDARY TOWNSHIP DISTRICT AND A STATEMENT SHOULD BE ADDED TO PARAGRAPH 5.3.61 TO SAY THAT THE APPROPRIATE GREEN BELT AREAS TO BE DELETED ARE THE GREEN BELT IN THE TOWN VALLEY AND WEST GATE HILL

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:

WHilst I HAVE PUT MY REPRESENTATIONS IN WRITING, I FEEL IT MAY HELP TO CLARIFY ITEMS AND AMPLIFY POINTS OF DOUBT AT THE ORAL EXAMINATION. THIS IS A LARGE ISSUE THAT AFFECTS MY WHOLE SURROUNDING NEIGHBOURHOOD.

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:

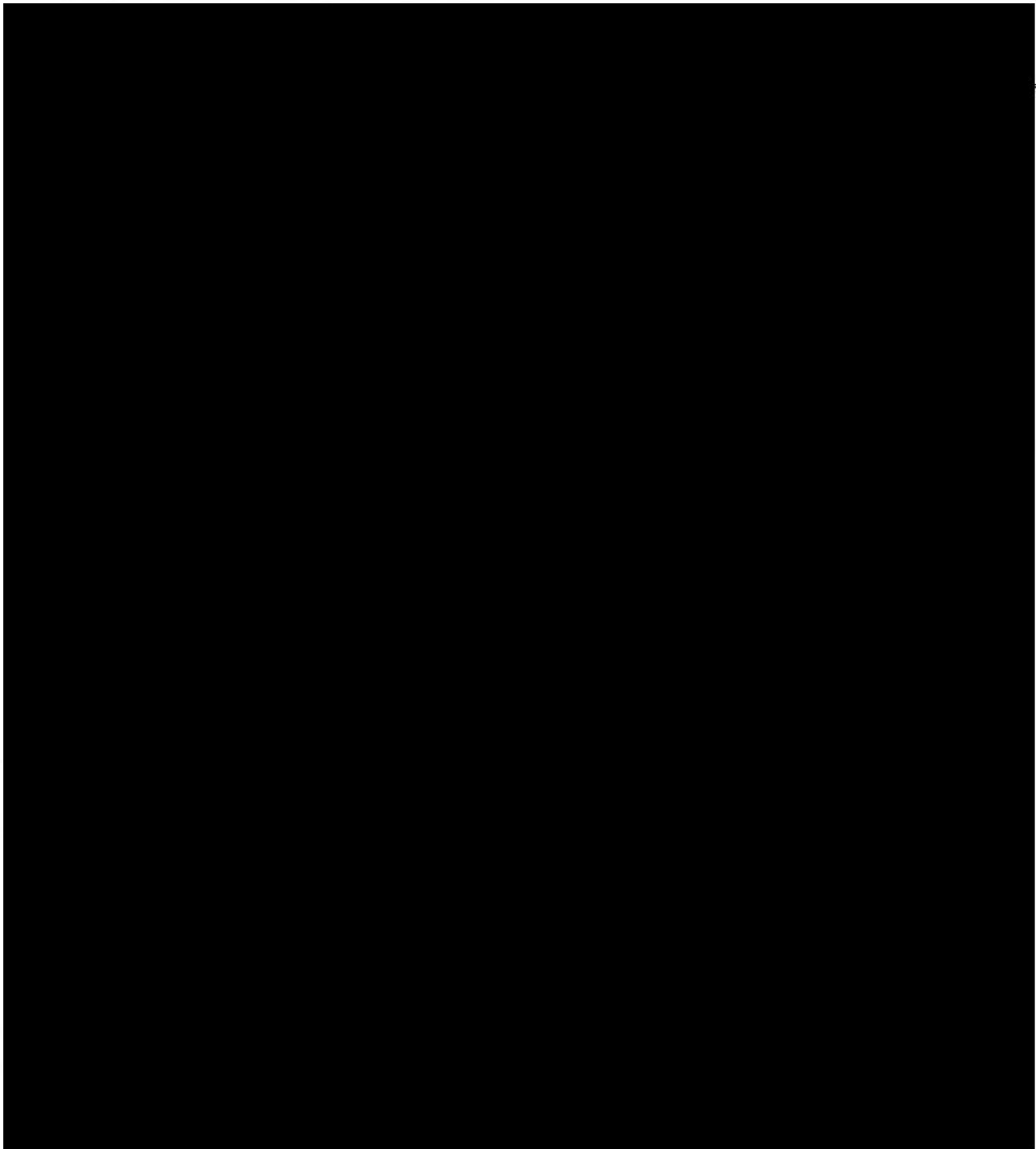
MARCH 28<sup>th</sup> 2014

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.



DUTY TO CO-OPERATE.

THERE HAS BEEN A FAILURE OF THE CORE-STRATEGY TO SHOW HOW THE 'DUTY TO CO-OPERATE' HAS BEEN APPROACHED AND FULFILLED. THERE SEEMS TO BE NO DOCUMENTATION IN BRADFORD'S DRAFT THAT IDENTIFIED THOSE WITH WHOM IT HAS COOPERATED, HOW THIS HAS BEEN DONE, AND WHAT HAS BEEN ACHIEVED THROUGH THE PROCESS.

THERE HAS BEEN A FAILURE TO CO-OPERATE/LIAISE WITH LEEDS METROPOLITAN COUNCIL DESPITE THE PROXIMITY OF THE GREEN BELT LAND BETWEEN THEM. THIS VITAL 'GREEN LUNG' OF LAND IS ESSENTIAL AS IT PROVIDES 'COALESCENCE' BETWEEN THE TWO CITIES. LEEDS'S COUNCILS OBJECTION TO BOTH THE TONG AND HURME WOOD N.D.P. AND TO THE CORE STRATEGY WIDENED AND BRADFORD'S 'HOSTILE' RESPONSE SHOWS A FAILURE TO ACHIEVE THIS. I ATTENDED BRADFORD COUNCIL'S MEETING AT CITY HALL ON JANUARY 20<sup>th</sup> 2012, WHEN THE THEN COUNCIL LEADER, IAN GREENWOOD STATED, AND I QUOTE:- "LEEDS COUNCIL AND LEEDS RESIDENTS DO NOT TELL BRADFORD COUNCIL WHAT TO DO, THEY DO NOT DECIDE BRADFORD COUNCILS PLANNING POLICY." THIS WAS IN REPLY TO AN 1,100 SIGNATURE PETITION FROM LOCAL RESIDENTS. THE LEEDS RESIDENTS HE REFERRED TO LIVED IN BRADFORD AT TREASAL, BUTTEN ESTATE AND PUDSEY, ALL PEOPLE INVOLVED.

THERE HAS BEEN A FAILURE TO CO-OPERATE WITH PUBLIC BODIES/AUTHORITIES. OMISSION OF EVIDENCE OF CO-OPERATION WITH HEALTH AUTHORITIES, WATER COMPANIES, DESPITE THE OBVIOUS HEALTH CONCERNS THAT WOULD FLOW FROM THE URBAN EXTENSION. THE AREAS IN THE 'BASIN' OF THE 'TONG VALLEY' NAMELY 'PUDSEY BECK' AND TROY DAM WOULD BE AT AN INCREASED RISK OF EVEN MORE FLOODING.

*[Handwritten Signature]*

DUTY TO CO-OPERATE - CONTINUED

I CONTACTED BANSFORD COUNCIL AND THE GAS AUTHORITIES TO HIGHLIGHT THE PRESENCE OF A NATURAL GAS MAINS PIPE LINE RUNNING FROM "WEST GATE HILL" (GILBERT ROAD) ACROSS THE FIELDS AND TONG VALLEY. THE LAND AFFECTED BY THE PROPOSALS. THE PIPE IS SITUATED RELATIVELY CLOSE TO THE GROUND SURFACE. IT IS INSPECTED DAILY BY A HELICOPTER FROM THE GAS COMPANY TO ENSURE NOBODY IS BUILDING NEAR THE GAS PIPE. I KNOW THIS FROM PERSONAL EXPERIENCE.





SOUNDNESS.

LACKING INFRASTRUCTURE REQUIREMENTS.

THERE IS NO EFFORT IN EITHER THE N.D.P. OR THE "CORE STATEMENT" TO INDICATE HOW ANY OF THE INFRASTRUCTURE NEEDS OF SUCH A VAST NEW COMMUNITY FOR IT TO BE SUSTAINABLE WOULD BE MET. THE PROPOSED DEVELOPMENT WOULD HAVE ACUTE IMPACT UPON BOTH LEEDS AND WIRLIESS, BUT THERE IS NO INDICATION OF THIS BEING RECOGNISED OR PLANNED FOR.

HOLME WOOD ESTATE DOES NOT HAVE THE INFRASTRUCTURE IN PLACE TO CATER FOR A DEVELOPMENT OF THIS SIZE. THE LARGE CAPACITY OF THIS NEW DEVELOPMENT WILL NOT HELP HOLME WOOD ESTATE TO BECOME A MORE SOCIALITY AND ECONOMICALLY MIXED COMMUNITY. THERE IS A RISK OF NON-INTERACTION. I AM NOT AGAINST THE PROPOSED 900 HOUSES IS AND AROUND HOLME WOOD WITHIN ITS EXISTING BOUNDARY. THIS IS A REASONABLE QUOTE FOR THE AREA.

TRAFFIC.

ROADFORD HAS RECENTLY BEEN IDENTIFIED AS THE THIRD MOST CONGESTED CITY IN THE U.K., WITH REGARD TO TRAFFIC. SURVEYS INDICATE THAT "LONG STREET" (A650) IS THE MOST CONGESTED ROAD IN ROADFORD. TO SUBSTANT A LARGE NEW HOUSING PROJECT THAT WILL INCREASE THE CONGESTION, WHICH AFFECTS THE ECONOMIC CLIMATE IS TOTALLY UNREALISTIC.

TO COMPOUND THE ISSUE, PROPOSALS HAVE BEEN PUT FORWARD FOR AN "ACCESS ROAD" FROM THE ROUNDABOUT AT 'WEST GATE HILL' (A650/CROSS LANE) ON/DIRECTION 157. PASS TO FINISH AT 'RAINES LANE', ADJACENT TO THE OUTSHOTS OF HOLME WOOD ESTATE.

J. G. [Signature]

TRAFFIC - CONTINUED

THIS WOULD CAUSE TOTAL "GRIDLOCK" THROUGHOUT "HOLME WOOD". ALSO PROPOSED HAS BEEN A HIGHWAY FROM THE PREVIOUS MENTIONED ALSO ROUNDABOUT AT "WEST GATE HILL" ACROSS THE "TON & VILLET" AREA TO "THORN BURT". THIS WOULD RESULT IN DEVASTATING "GREEN BELT" LOSS AND ARCHITECTURAL THREAT TO THE ANCIENT "BROWN CARB" WOODS. A LINK ROAD SUCH AS THIS WOULD NEED AGREEMENT AND TOTAL SUPPORT FROM NEIGHBOURING AUTHORITIES, SUCH AS LEES.

THE LOCAL FARM ROADS ARE VIRTUALLY SINGLE LANE, NARROW WITH "PASSING PLACES" eg. NEW LANE AND "DEY LANE". ALONG WITH THE HISTORIC "TON & VILLET" THEY WOULD NOT BE ABLE TO cope WITH THE INCREASED TRAFFIC. ACCIDENTS, COLLISIONS WOULD INEVITABLY RESULT.

I MAINTAIN THE "GREEN BELT" PROTECTION SHOULD BE KEPT INTACT, AS THERE ARE OVER 6,000 BURT HOUSES, AS SURVEY BY THE "KYLE & PARTNERS", FOR THEIR "SAVE OUR GREEN SPACES" CAMPAIGN INDICATED THIS AMOUNT IN ROAD FRONT. ALSO UTILISING "BROWNFIELD" SITES, AS INDICATED BY THE SALGA PROCESS SHOULD BE A PRIORITY.

THE PRIORITY INCLUSION OF THIS IN THE N.D.P. INDICATED A LEVEL OF GENUINE COMMITMENT TO "GREEN BELT" PROTECTION BY BRADHEAD COUNCIL. AS FAR AS I AM AWARE, THERE IS NO NEGOTIATION HAPPENING WITH OTHER LOCAL AUTHORITIES TO REACH MUTUAL CONSENT ON THIS.

TURN OVER.



TRAFFIC - CONTINUED

ALL THE LAND I AM CONCERNED WITH HAS "GREEN BELT" PROTECTION. THE "NATIONAL PLANNING POLICY FRAMEWORK" (NPPF) NEEDS THE SAME HIGH LEVEL OF PROTECTION TO THE "GREEN BELT" AS IN THE PREVIOUS UNITARY DEVELOPMENT PLAN (U.D.P.) AND IDENTIFIED FIVE PURPOSES SERVED BY THE "GREEN BELT".

THE "CORE STRATEGY" DOES NOT MENTION THESE OR THEIR IMPORTANCE.

THE "GREEN BELT" AFFECTED BY THESE PROPOSALS PREVENTS URBAN SPRAWL BETWEEN BARNFORD, LEEDS AND WIGAN, AND THE THREAT OF COLLAPSE BETWEEN BARNFORD AND LEEDS WAS WHY LEEDS COUNCIL OBJECTED TO THE NPPF AND E.C.D. THE INCLUSION OF SITE 8/101 EVEN FURTHER THREATENS THIS LOSS OF COHESION. I REALISE DEVELOPERS PREFER "GREENFIELD SITES" FOR REASONS OF ECONOMY, IT IS SO MUCH EASIER THAN BUILDING ON "BROWFIELD" SITES, WHERE CONTAMINATION MIGHT BE AN ISSUE. I REALISE PEOPLE HAVE TO HAVE SOMEWHERE TO LIVE, BUT THIS PROPOSAL FOR THIS VITAL, NATURAL, COUNTRYSIDE AREA IS NEITHER SUITABLE OR PRACTICAL.

