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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	Mr	
First Name	[REDACTED]	
Last Name	Bennett	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Leeds	
Line 4	West Yorkshire	
Post Code	LS28 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 31-03-14

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.

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

I wish to challenge the Soundness of Bradford Council's Core Strategy to its Local Plan. I am a resident of Pudsey, which borders Bradford MBC. I extensively use the countryside both side of the Local Authority borders for recreational walking and enjoyment of the environment. My comments relate to that part of the Core Strategy that is proposing an Urban Extension to Holme Wood with consequent loss of considerable open space that currently enjoys Green Belt protection.

I would like the following to be considered:

1. Lack of thorough preparation

The Tong and Holme Wood 'Neighbourhood Development Plan' shows plans for improvements to Holme Wood that will not effect change in the long-term. The plans for an Urban Extension to Holme Wood 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.

The two possible options for highway requirements to support any new development leave doubt as to how the new community would be accessed.

- 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 extra traffic that would be discharged into the estate roads of Holme Wood and surrounding areas would substantially increase.

The development would therefore have little effect in meeting Bradford's housing needs, and has therefore not been positively prepared to meet this challenge.

- A 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.

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'.

2. Lack of effectiveness.

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. The need for such collaboration is very clearly demonstrated by the unusual geographical boundary whereby Bradford's 'Tong triangle' cuts so deeply into Leeds MDC territory and is therefore largely surrounded by land that is under Leeds jurisdiction. There appears to be little recognition of the heritage, recreational and environmental value of this 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' West Leeds Country Park. This ignores and further damages the essential integrity of the Tong Valley in Bradford with Cockersdale and Fulneck in Leeds.

3. Lack of justification

The plan is not justified for the following reasons:

- 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. Footpaths Tong 1,2 and 3 run through the proposed development. They are at present in green fields, offering recreational walking and extensive views. They would be effectively turned into tarmacked ginnels. The development would abut Kits Wood, leading to severe adverse impact upon wildlife.
- 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 and land in between the existing boundaries needs revisiting. There are other sites that have not been included in the SHLAA that are much more suitable. Any tour of the city reveals both considerable brown field land and also empty buildings that could be easily converted into residential accommodation.

4. Lack of adherence to national policy

There is little evidence and concern of the Council's priority for maintaining Green Belt protection.

The points for the formation of a Green Belt are:

- 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.

The plans ignore the need to protect the Tong Valley and Westgate Hill. It also seems to be the case that the ensuring of future secure boundaries to the Green Belt has also been disregarded. There is a failure to recognise need to establish defensible boundaries to the Green Belt at Westgate Hill and the Tong Valley.

I would ask the Inspector to recognise that Bradford's plan to establish what it describes as a Holme Wood Urban Extension 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 existing Holme Wood 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 this 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.

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:

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:	31-03 14
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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?

