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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	Booker	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3		
Line 4	Leeds	
Post Code	LS28 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 30/03/2014

#### 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		Policy	TR1
	4			TR3
	5			TR5
	6			TR7
				SC7

**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	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.**

As a local resident of the area and a frequent user of the green space which will be absorbed by the proposed development and a regular user of the already somewhat congested local transport networks, I believe that the proposal put forward for the development of 1800 homes in the Holme Wood area should not be permitted due to the following factors.

## Transport and Traffic Concerns:

- **Congestion** Bradford has been assessed as the third most congested city in the UK with regard to , 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.
- **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 major green belt 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
- **Rural Roads** The rural farm roads that lead to Tong or Tyersal are entirely unsuited to carrying the increases in traffic that would result from the Urban Extension, and further substantial traffic increases in Tong Lane through the Tong Conservation Area would be highly undesirable.

**Green Belt Protection** All of the land that is included with the development proposal 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; nor does it reflect any clear commitment for minimising green belt release.

Each of the Five Purposes will be compromised by the proposed Urban Extension to Holme Wood:

### 1. Prevent Spread of Urban Sprawl

The Green Belt currently controls effectively the growth of urban sprawl both between Tong and Holme Wood, and between the Metropolitan Districts of Bradford, Leeds and Kirklees. In particular the boundary to the green belt provided by Westgate Hill Street, Holme Lane and Ned Lane is adequate and defensible. The proposed sites and boundaries identified on the SHLAA plan for the Urban Extension are arbitrary and largely indefensible.

### 2. Prevent merger of Neighbouring Towns

**Vital Lung:** 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 NDP and FED by Leeds Council. The threat of such coalescence has increased in the current plan with the inclusion of site SE101.

### 3. Safeguard the countryside from encroachment

**Vital Countryside:** The current boundaries enable the preservation of important countryside opportunities in the Tong Valley for residents of Bradford, Leeds and Kirklees. TFVA is committed to working with others to see this enhanced in for future generations. Bradford's concept of a major new highway to be constructed between Westgate Hill and Thornbury would further destroy important countryside, and threaten the ancient woodland at Black Carr Woods.

### 4. Preserve the setting of Historic Towns

**Tong and Fulneck:** The ancient and historic communities of Tong and Fulneck and the recreational benefit 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 18<sup>th</sup> 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 18<sup>th</sup> century fittings and furnishings from its rebuild in 1727 by leading Methodist preacher, John Nelson. Tong Village has a wide range of other listed buildings and features.

### 5. 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 protection for the Tong Valley is vital to ensure that the substantial areas of Bradford land that needs regeneration is given priority.

### 3<sup>rd</sup> TFVA REPRESENTATION

**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.

**Failure to Co-operate with Leeds MC.** There is no sign of any committed and sustained co-operation 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 Tong and Holme Wood NDP 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 that has been followed to meet this requirement, either in the ongoing process of the formation of the Core Strategy or in the completion of its final form.

**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 Troydale.

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.

Policies TR1, TR3, TR5 and TR7 should give greater clarity as to how the road network will be improved to deal with what will inevitably be an increase in the number of private car journeys as well as, rightly, setting out the commitment to modal shift and public transport.

Policy SC7 should include more specific protections against avoiding coalescence of existing settlements and have greater regard to the impact of any Greenbelt development on neighbouring local authorities.

Is there any provision to ensure that there are sufficient health services, dental surgeries and school places? School places are already stretched on both sides of the Leeds/Bradford border, what will all this housing do and how will it impact on the statutory duties of both authorities to provide every child with a school place?

**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?**

<b>No</b>	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:**

30 March 2014

**Core Strategy Development Plan Document (DPD) : Publication Draft**

**PART C: EQUALITY AND DIVERSITY MONITORING FORM**

