

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

The Council are seeking comments on the Proposed Main Modifications to the Core Strategy, following the Examination in Public in March 2015. The changes are proposed by the Council to address issues of legal compliance and soundness and we can only accept representations on these matters.

Comments on the Proposed Main Modifications Schedule are invited from **Wednesday 25th November 2015 until Wednesday 20th January 2016.**

REPRESENTATIONS MUST ONLY RELATE TO THE PROPOSED MAIN MODIFICATIONS.

You can access the Core Strategy documents online and additional copies of this form from our website: www.bradford.gov.uk/planningpolicy then 'Core Strategy Proposed Main Modifications', or you may request copies by:

- Emailing us at: planning.policy@bradford.gov.uk
- Phoning us on: (01274) 433679

Completed representation forms must be returned to Development Plans, by the deadline below, by either:

- **E-mail to:** planning.policy@bradford.gov.uk
- **Post to:** Core Strategy - Proposed Main Modifications
Development Plans Group
City of Bradford Metropolitan District Council
2nd Floor South - Jacobs Well
Nelson Street
Bradford
BD1 5RW

**ALL COMMENTS MUST BE MADE IN WRITING AND SHOULD BE RECEIVED
BY THE DEVELOPMENT PLAN GROUP AT EITHER OF THE ABOVE ADDRESSES
NO LATER THAN 4PM ON WEDNESDAY 20TH JANUARY 2016.**

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 A: PERSONAL DETAILS

* If an agent has been appointed, please complete only the Title, Name and Organisation in box 1 below and complete the full contact details of the agent in box 2.

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)	
Title	Mr		
First Name			
Last Name	Smith		
Job Title (where relevant to this representation)			
Organisation (where relevant to this representation)			
Address Line 1			
Line 2			
Line 3	Bradford		
Line 4			
Post Code	BD4		
Telephone Number			
Email Address			
Signature:		Date:	18/1/16

3. Please let us know if you wish to be notified of the following:

The publication of the Inspector's Report?	Yes	Yes	No	
The adoption of the Core Strategy?	Yes	Yes	No	

Are you attaching any additional sheets / documents that relate to this representation?	Yes	Yes	No	
	No of sheets / documents submitted :		2 part B	

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PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.
(Additional Part B forms can be downloaded from the web page)

4. To which proposed main modification does this representation relate?

Proposed Main Modification number: **MM17, 18 & 80**

5. Do support or object the proposed main modification?

<input type="checkbox"/>	Support	<input type="checkbox"/>	<input type="checkbox"/>	Object	<input type="checkbox"/>	Object
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6. Do you consider the proposed main modification to be 'legally compliant'?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	<input type="checkbox"/>	No	<input type="checkbox"/>
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7. Do you consider the proposed main modification to be 'sound'?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	<input type="checkbox"/>	No – 'unsound'	<input type="checkbox"/>	Unsound
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8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

<input type="checkbox"/>	Positively prepared	<input type="checkbox"/>	Not	<input type="checkbox"/>	Justified	<input type="checkbox"/>	Not
<input type="checkbox"/>	Effective	<input type="checkbox"/>	Not	<input type="checkbox"/>	Consistent with National Planning Policy (the NPPF)	<input type="checkbox"/>	Not

9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to the proposed main modifications).

Whilst some of the following comments may well be applicable to other areas of Green Belt within Bradford Council boundaries, they are primarily directed at the specific issue of the proposed loss of Green Belt in the Tong Valley.

It is very clear from the Core Strategy that Bradford Council view the Green Belt of the Tong Valley as 'up for grabs'.

The only plan which exists in the SHLAA showing areas SE99 & 100, earmarked for 1800 houses in the Green Belt (plus 300 in Green Belt higher up the valley totalling 2700 in the area including 600 infill) also shows area SE101 as available (but currently unsuitable only by reasons of access). By extrapolation this means an intention to grow to well over 3000 houses in the Green Belt (over 4000 in total), or perhaps commercial usage which would be wholly inappropriate. No one knows because a published plan does not exist. However it is clear that the land is available either because it has already been banked by developers or is in the process of being so. The shape of the SE99/100/101 areas indicates this fact, by virtue of its haphazard boundaries defined by land ownership and is totally at odds with the requirement for Green Belt to have well defined boundaries to avoid further creep or infill.

Conversely, Leeds Council has shown they respect the Tong Valley Green Belt. They have no plans to encroach on it and furthermore developed and encouraged use of the Green Belt by forming the West Leeds Country Park, through which runs the Leeds Country Way, supported locally by for instance the Fulneck Bridleway initiative. There was a point when Bradford were invited to pursue this Country Park development along with Leeds but failed to do so. It was pointed out that Bradford had ignored its own Tong Valley Landscape Character supplementary planning document and has apparently now included that as a document attached to the Core Strategy. Bradford are nonetheless completely ignoring its recommendations, the key ones being to keep any development in the area to a bare minimum, retain its rural nature for future generations and to actively improve and develop the area for leisure. Furthermore, Bradford Council have a Duty to Co-operate with all local interested parties but specifically, (and significantly, bearing in mind that the majority of the Bradford owned land in question is virtually surrounded by Leeds and to a lesser degree, Kirklees land), with Leeds City Council.

Bradford Council has, insofar as the plans for Tong Valley are concerned, failed to have any meaningful discussions with Leeds Council and has therefore failed in its Duty to Co-operate. Evidence of this, following criticism that Bradford had not complied with their DtC in regard to the Tong Valley proposals, is that the lengthy updated document published in February 2015 in an endeavour to counter this was predominantly an exercise in obfuscation, focussing more on what the DtC requirements are rather than providing evidence of compliance.

Despite Bradford's assertions that it is necessary to build 2100 houses on the Tong Valley Green Belt, (or more as discussed above) plus a further 600 in the vicinity there are no published plans of any consequence which would enable sensible discussions to take place with Leeds City Council and other interested organisations. There is no information on how the proposed development will be accessed. Indeed the existence of plans for a link road, which is said to be necessary to achieve suitable access, was only recently denied in an email from a local Tong councillor Michael Johnson on 7th of December 2015. How can the implications on traffic between Leeds & Bradford be calculated in any meaningful way without this information (the nearby A650 is known to be one of the most congested routes in the

vicinity).

With the prospect of such an increase in housing in the area, there are significant infrastructure issues to resolve and to date Bradford Council have tried to side step many of those issues by referring to this as the Holmewood Urban Extension, the inference being that the new estate will be integrated into the existing estate and will share many of it's facilities, eg the Broadstone Way shopping centre. This, as any local resident will confirm does not stand even a basic common sense test.

Furthermore, Bradford Council continues to state that the Neighbourhood Development Plan supports building in the green Belt at Tong. Apart from the NDP being legally flawed, only those on the Council side voted in favour of the development and all representatives from the community (50% of the total) voted against it. Purposely and continually misinterpreting information of this nature must in itself be unsound.

The Tong Valley acts as a drainage channel for hundreds of acres of farmland and woodland and by a network of tributary streams feeds the Pudsey beck which enters the Leeds district at Roker Lane. It then crosses Troydale lane and continues to the Wortley Ring Road. The large acreage of natural land currently absorbs high levels of rainfall effectively and releases it to the water courses gradually. Despite this, there have been incidences of flooding at the above mentioned points already, particularly badly affected have been areas along the Wortley Ring Road in Leeds, most recently in December 2015. Without doubt, the building of 2700 (or more?) homes in, or at the top end of the valley as planned will seriously increase water run off and therefore the flood risk downstream in Leeds. In the light of recent heavy rainfall and flooding in the north and the likelihood of worsening weather conditions in the future it would be a huge folly to build in the Tong Valley without being absolutely certain that the necessary infrastructure was in place to reduce flood risk. Again, there is no evidence that an in depth study has been undertaken or that it has been discussed with Leeds City Council. The Bradford Growth Assessment does not address this.

Bradford Council are pushing through the plans to build on the Tong Valley Green Belt despite opposition from the local community, a complete lack of detailed plans or indeed investigation into the consequences of building there, a lack of meaningful discussions with relevant organisations, not least Leeds & Kirklees Councils, and a disregard for the significance of the Tong Valley Green Belt in maintaining a buffer between two large and geographically very close cities. There is also the issue of whether the houses are actually needed. The overall housing requirement has now been reduced significantly over the years. At the time that 6000 houses were planned for South East Bradford (including the Tong Valley), the required number of new homes for the district has dropped from 45900 to 42000 yet there has been no reduction in the numbers said to be needed in the Tong Valley. This is particularly worrying given that the Council have earmarked even more land than is necessary for the 2700 houses in the plan. Bradford Council is clearly being disingenuous about claimed 'need' and their long term aspirations for building in the area.

It is clear from their own documents that Bradford Council are pushing ahead with the so called Homewood Extension in the Tong Valley for these reasons;

1. Presumably, referring to the 1800 planned new homes in areas SE99/100 as the Holmewood Urban Extension (as opposed to a completely separate development which it logically is), enables

Government and/or developer contributions to be siphoned off to fund improvements to the existing Holmewood estate. Firstly this is a one-off windfall and therefore unsustainable and secondly those contributions will surely be required to fund the necessary infrastructure for the new development to ensure it doesn't in time suffer the same consequences as the original Holmewood estate.

2. The extent of land banking and developer interest is an indication that the plan is to accelerate development of the greenfield site in Tong Valley to hasten build numbers in pursuit of annual house building targets and receipt of contributions.
3. The above flies in the face of community expectation that brownfield sites will be developed in preference to and in advance of green field sites.
4. It also means that the development could start without sufficient consideration for the infrastructure needed to accommodate the final development size, leading to inadequate and unsustainable development and the risk of causing flooding in Leeds

In a desire to achieve agreement on plans for the Tong Valley, Bradford Council have not been diligent over their obligations and furthermore are continuing in that vein by the proposed changes in MM17 and 18 which seek to ignore the requirement of establishing genuine 'Exceptional Circumstances' to justify the release of Green Belt land for housing merely by saying that the need to achieve housing targets requires it. Bradford Council has not complied with its duty to co-operate with adjoining authorities in relation to those elements of the Core Strategy which are based on an assumption of Green Belt release at key location and its claim of 'exceptional circumstances' without substantial evidence of this being done in collaboration with neighbouring authorities is premature and inadequate.

This is in direct contravention of NPPF guidelines.

With the evidence of Bradford Councils' actions to date I am gravely concerned that any Green Belt review, local or otherwise will be merely an exercise in manufacturing the outcome to support the current plans irrespective of the facts.

10. Please set out what changes you consider necessary to make the proposed main modification legally compliant or sound, having regard to the test you have identified at Q7 above.

You need to say why this change will make the proposed main modification 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.

Any wording which suggests that Exceptional Circumstances have already been established should be removed and any remaining wording should not exclude, and ideally specifically include, the requirement for every individual planned change of use of Green Belt land to have it's own transparent review open to public scrutiny.

11. Signature:

[Redacted Signature]

Date:

18/1/16

Thank you for taking the time to complete this Representation Form.