

## 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 25<sup>th</sup> November 2015 until Wednesday 20<sup>th</sup> 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](http://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](mailto: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](mailto:planning.policy@bradford.gov.uk)
- **Post to:** Core Strategy - Proposed Main Modifications  
Development Plans Group  
City of Bradford Metropolitan District Council  
2<sup>nd</sup> 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 20<sup>TH</sup> 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	[REDACTED]	
Last Name	Thomas	
Job Title (where relevant to this representation)		
Organisation (where relevant to this representation)		
Address Line 1	[REDACTED]	
Line 2	Pudsey	
Line 3		
Line 4		
Post Code	LS28 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 19 <sup>th</sup> Jan 2016

### 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	2	No	
	No of sheets / documents submitted :		2 additional documents attached	

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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

#### 5. Do support or object the proposed main modification?

Support

Object

#### 6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

#### 7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

#### 8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Effective

Consistent with National Planning Policy (the NPPF)

#### 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).

Taking away the Green Belt status of the Tong Valley and building the houses proposed would definitely be unsound.

The proposal is not consistent with the National Planning Policy as there are no clear exceptional circumstances. Something exceptional is by definition 'unusual, atypical and extraordinary'. The modification gives no evidence of what is 'exceptional' about the need to deliver a long term plan for housing and jobs. The long term plan certainly doesn't trump the National Planning Policy definition of the key five purposes of Green Belt which includes to "check the unrestricted sprawl of large built up areas" and to "assist in the safeguarding the countryside from encroachment". If Tong Valley was built on it would lose its essential role of preventing Leeds and Bradford from joining up. It would not just undermine its 'strategic function' but absolutely lose it. How can you

build 11,000 homes in a small countryside area which separates two cities without losing this function. There would be thousands of houses built on what was previously historic environment. Clearly no exceptional circumstances can justify such a blatant encroachment of the countryside.

- As National Planning Policy Framework point 88. Says “substantial weight should be given to any harm to the Green Belt.” The inappropriateness of building on this Green Belt land is considerable (please go for a walk around it before making your decision) given the impact it would have on those living in Tong village, Fulneck, and that side of Pudsey. The National Planning Policy Framework is clear in its protection of Green Belt and the necessity to meet housing targets on its own is not enough to get rid or override Green Belt protection.
- This is not effective as it does not represent a joint cross boundary strategic priority. Indeed Cllr Mick Coulson of Pudsey, Chair of the Outer West Community Committee, said in an email to me “I have been fighting this development for 3 years, councillors objections went in 3 months ago”.
- The Neighbourhood Development plan does not support Tong Valley being used for such housing as there is overwhelming public opposition to what has been proposed, indeed Stuart Andrew the local MP has also gone on record as being against this proposal. The selective review of the Green Belt is meant to be taken in consultation with local communities, but local communities have already spoken, it is a very clear ‘no’.

**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.**

In order for the main modification to be sound I suggest it be changed to:

Due to the lack of exceptional circumstances and due to local opposition there is no remit to build in Tong Valley as better alternatives are elsewhere, so the number of houses being built will be kept to SE 62, SE 051, SE 112.

Or at least a further period of public consultation is needed with local stakeholders, community groups and representatives before any changes to the Green Belt land can be made.

**11. Signature:**

[Redacted Signature]

**Date:**

19<sup>th</sup> Jan 2016

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