

## 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	Reverend Canon	
First Name	[REDACTED]	
Last Name	Dey	
Job Title (where relevant to this representation)	Chairperson	
Organisation (where relevant to this representation)	Tong Fulneck Valley Association	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Bradford	
Line 4		
Post Code	BD9 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 20.1.2016

### 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	No	No	
	No of sheets / documents submitted :			



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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:

MM38 MM44, MM51,

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

Support

Object

Object

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

Yes

Yes

No

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

Yes

No – 'unsound'

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

No

Justified

No

Effective

No

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).

I agree that a key principle for appropriate housing growth, especially in Bradford, should be one that plans for new homes in areas where people want to live – and so the reinstatement of previously projected housing for the Wharfe and Airedale valleys would be justified on this premise, as would also the opportunity it offers to improve Bradford's economic prospects. Nevertheless it has become very clear in recent days that any risks that relate to flooding are properly identified in the current process, and Bradford Council needs to do more to satisfy this requirement.

However I would highlight the following concerns:

1. It is disappointing, but revealing, that Bradford Council, in the light of increased building in the Wharfe and Airedale valleys has not seen opportunity to reduce the amount of greenbelt land to



be released, but has instead identified other locations where reductions can take place. I have highlighted my concern about Bradford's proposals for Green Belt release in a further Representation. I would suggest that it is in clear contradiction to NPPF regulations that any decision about Green Belt release is minimalised in this way.

2. The disproportionality of housing projected for SE Bradford, and in particular in the creation of the so-called 'Holme Wood Urban Extension' is therefore even more evident. There is no sign of this having been re-visited, despite the widespread public objection that was reflected at the Hearings in Saltaire, and the cogent reasons that were presented for restricting such development to a maximum of 900 new homes.
3. I'm disappointed that the opportunity to 'reimagine' Bradford City Centre is not being grasped better. The radical change that is taking place in retail shopping behaviour, and the continuing closure of many retail and business premises, despite, or in some cases, because of the opening of the new Westfield Centre should be alerting the Council to respond to new opportunity for varied and creative residential development that would bring new hope and style to Bradford, and would the limit the need for greenbelt release, and destruction of the countryside.
4. The threat of increased flooding that would result from housing and industrial development in the Tong and Fulneck Valley needs greater attention. Holme Beck and Tyersal Beck are the main sources of Pudsey Beck, which is now regularly flooding at the bottom of Roker Lane and Troydale, and causing damage and disruption to residents and businesses. Pudsey Beck is also a significant feeder into the River Aire, and so a factor in any flooding problems in Leeds City Centre. Any substantial housing development over Westgate Hill and the Tong Valley would significantly increase the 'run-off' of water into Pudsey Beck, and further threaten the homes and businesses in that area.

**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.**

The Council should review whether it has taken the risks of flooding sufficiently into account in the locations it is proposing for future housing development.

The Council should take the opportunity to reduce the amount of Green Belt release it is proposing in the light of the new housing proposals for Wharfedale and Airedale.

The Council should be creatively and energetically exploring how to reimagine Bradford City Centre and raise the level of new homes that it can accommodate.

In particular, he Council should produce plans that reduce the amount of building in and around Holme Wood to a maximum of 900 new homes.



11. Signature:



Date:

20.1.16

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