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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	FINNIGAN	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	[REDACTED]	
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
Line 4	[REDACTED]	
Post Code	BD4 9PT	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	Authorised by resolution of the Trustees of the Tong and Fulneck Valley Association dated 20 March 2014	Date: 24 March 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	ALL	Paragraph		Policy	
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	NO
4 (2). Sound	Yes		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.

1. Grounds of Representation

1.1. We contend that the consultation exercise, insofar as it relates to the Further Engagement Draft Stage of the Core Strategy was fundamentally flawed. This is a legal impediment to the Plan.

2. Particulars of Representation and supporting evidence

Urban Extension at Holme Wood and Tong

2.1. Our reasons for contending that the consultation exercise was flawed relate to that part of the Core Strategy Development Plan Document Publication Draft (the "Publication Draft") which refers to an urban extension at Holme Wood (the "Urban Extension"). The Urban Extension is a key part of the Bradford MDC ("Bradford" or the "Council") strategy to provide 42,087 new homes by 2030.

2.2. The Urban Extension is referred to on the plan at Page 67, at Policy BD1 C.1 (page 73), Paragraph 4.1.3 (outcomes by 2030) (Page 64), Sub-area Policy BD2 E (Page 79) Paragraph 5.3.22 (page 158), Paragraph 5.3.34 (Page 161) Paragraph 5.3.35 (Page 162) Paragraph 5.3.37 (Page 162) Policy HO2 B 2 at Paragraph 5.3.37(Page 163), Paragraph 5.3.42 (Page 164), Paragraph 5.3.61 (Page 169),Table 1 to Appendix 6 (Page 358) and Appendix 6 paragraph 1.9 (Page 363).

Decision Fast Tracked and pre-determined

2.3. We contend that a decision to pursue the Urban Extension was accelerated or "fast-tracked" unnecessarily, so that the issue as to whether there should be a large scale green belt release in SE Bradford to accommodate the construction of 2,700 new homes at Holme Wood had been determined before the public consultation period on the Core Strategy Further Engagement Draft (the "Further Engagement Draft") had closed; and indeed that the decision was even taken by the Executive before the results of the public consultation on the Holme Wood and Tong Neighbourhood Development Plan (referred to below) had been fully analysed and published.

- 2.4. This means that, although the public consultation process was pursued, there was no real “consultation”. That is because those officers charged with making recommendations, and those Councillors making the relevant decision, were not fully apprised of the views of the public. Even if all or some of them were apprised (which does not seem to be the case) those members of the public who had made representations were not able to be satisfied that their representations had been duly considered.

Rules of natural justice

- 2.5. We accept that consultation by an authority does not require it to weigh the opposing views expressed by the public in a numerical or “democratic” way, nor necessarily to reflect a majority opinion; but it does require, following the rules of natural justice, firstly that the opinions of the wider public be fairly heard and considered, and secondly that those opinions be seen to have been fairly heard and considered. It is not sufficient that the consultation process is a mere “box-ticking” exercise.

Supporting evidence

- 2.6. Our evidence in support of this representation is as follows:

2.6.1. **Tong Valley** Tong Valley is a triangular tongue or peninsular of Green Belt land at the South East corner of Bradford District projecting into Leeds MDC. At its heart is the Conservation Area of Tong Village. On the north and north east it is bounded by the town of Pudsey and the Conservation Area of Fulneck (both in Leeds MDC). On the east it is bounded by other Green Belt land within the Leeds MDC boundaries, including very small pockets of habitation at Roker Lane and Troydale. On the south east side it is bounded by Cockersdale, which is also Green Belt land wholly within Leeds and comprising a large wooded area at Sykes Wood and open fields separating Tong Village from the settlement of Drighlington in Leeds. The western or upper part of Tong Valley is bounded in part by a small area of land falling within the boundaries of Kirklees MDC and as to the remainder by small pockets of housing at Westgate Hill, two school sites, one of which is currently redundant, the largely private Mossdale and Denbrook and Holme Beck Park housing estates and existing largely social housing Holme Wood Estate.

2.6.2. The location of Tong Valley is as illustrated in Figure BD1 in the Publication Draft (page 76). The area is more precisely shown at page 10 of the “Landscape Character Supplementary Planning Document Volume 7: Tong Valley 2008”. Tong Valley is not itself delineated or otherwise referred to in the Publication Draft except at Paragraph 5.4.98 where there is an apparently erroneous reference to “Esholt Tong Valley” which we think is intended to refer to “Esholt Tong Park”, an entirely different part of Bradford.

Further Issues and Options Consultation in Autumn 2008

2.6.3. Prior to producing the Further Engagement Draft, Bradford engaged in a Further Issues and Options Consultation in Autumn 2008. Details of this are outlined in the Document “Core Strategy Further Issues and Options Consultation February 2009” (“the First Consultation Report”). This was the first occasion that the public was informed of Bradford’s desire to build houses in the Tong Valley.

2.6.4. On that occasion the public were asked to comment on four spatial options. Option 1 set out the Regional Spatial Strategy and Option 2 the Unitary Development Plan. Neither of these options provided for any material housing growth in the Tong Valley. Option 3 set out a new strategy for focussed growth and Option 4 a strategy for dispersed growth. Both these options made reference to extensive Green Belt releases at Holme Wood.

2.6.5. As a result of extensive concern expressed by residents in SE Bradford a detailed consultation took place in the Tong Ward area in 2008 as recorded in the First Consultation Report. The vast majority of responses at the three Neighbourhood Forum meetings expressed concerns about the

nature and extent of the proposed housing plans with an overwhelming concern at the suggestion of extensive Green Belt release. The written responses were also almost wholly opposed the extent of the proposed Green Belt release. On the question posed at the Consultation Event as to, if there were an extension at Holme Wood, how many additional houses should be built, only 14 out of 131 responding opted for more than 2000 houses and 81 opted for 500 or fewer, despite the suggestion that larger numbers of houses could bring greater financial benefit to the area.

The Holme Wood and Tong Partnership Board

- 2.6.6. The Holme Wood Partnership Board (later known as the Holme Wood and Tong Partnership Board) was established. It was charged with looking at ways to regenerate Holme Wood estate. Its membership comprised Council Officers, Councillors, representatives of InCommunities (the largest social housing landlord on the estate) and community representatives.

The Holme Wood and Tong Neighbourhood Development Plan – the Options

- 2.6.7. GVA was commissioned in March 2010 to prepare what was described as a neighbourhood development plan (the “NDP”) for the Holme Wood area. GVA reported in February 2011 indicating three options for Holme Wood. These were:- Option A, for infill only and up to 120 new homes; Option B for modest Green Belt release to the north of the site resulting in up to 670 new homes; and Option C for two urban extensions in green belt producing up to 1400 new homes. The Partnership Board examined drafts of the NDP to be put out for further consultation. Two options were included in this final draft for consultation, Option 1 being similar to Option B in the GVA report and Option 2 being a much more extensive incursion into the Green Belt than the GVA Option C, comprising three identified sites delineated in the plan attached to that draft and producing 2700 new homes as part of an urban extension.

The Minority Report

- 2.6.8. The Partnership Board approved the draft NDP on the casting vote of the Chairman with no support being expressed by any of the community representatives for Option 2. In fact such was the concern of the community representatives that they lodged with Bradford Council a memorandum of minority members’ comments (the “Minority Report”), with particular reference to the need for the NDP to contain more positive statements about the community benefit currently derived from the Green Belt land, the benefits of avoiding coalescence with the neighbouring authorities of Leeds and Kirklees through the defence of the Green Belt in South Bradford and at Tong, and a commitment to supporting community development of the Tong Valley countryside as an accessible recreational facility for Holme Wood and Tong and visitor attraction for residents across Bradford and in neighbouring authorities. (A full copy of the Report as delivered to the Council is set out in the Schedule below.)

The “Parallel” Consultations

- 2.6.9. The consultation on NDP and the Further Engagement Draft, were intended to run in parallel. This was set out at Paragraph 3.2.36 of the Further Engagement Draft, which stated that *“The Holme Wood Neighbourhood Development Plan proposals are the subject of a separate and parallel consultation exercise to that being carried out on the Core Strategy”*.
- 2.6.10. This did not happen. The Further Engagement Draft was delayed, but Bradford Council did not hold back the publication of the NDP Consultation Draft. In consequence the Wider Public Consultation Programme for the NDP commenced on 14 September 2011 and ended on 8 November 2011. The Wider Public Consultation on the Further Engagement Draft however did not commence until 28th October 2011 and was advertised to close at 5.00pm on 20th January 2012. As a result of concern that the delay in the publication of the Further Engagement Draft had

resulted in the consultation period being scheduled to cover the Christmas and New Year holidays a motion was put to Council on 13th December 2011 to extend the consultation on the Further Engagement Draft to 29th February 2012. This motion was opposed by the Portfolio Holder on behalf of the Executive Committee, but was supported by the full Council. In consequence the consultation on the Further Engagement Draft was extended, but the timetable for the NDP consultation was not reopened and extended.

- 2.6.11. For reasons which were not clear, Officers put the NDP on the Agenda of the Executive for 20th January 2012 with a recommendation for approval of Option 2. This was before the responses to the consultation on the NDP had been collated, fully analysed and published.

Objections to “fast tracking”

- 2.6.12. This “fast tracking” approach in respect of the NDP was objected to by the Council’s own Scrutiny Committee at its meeting on 5th January 2012, which resolved inter alia:-
“2. That the Committee expresses its strong concern that this item appears to have been “Fast Tracked” to the Executive, despite originally being on this Committee’s Work Programme for later this year.”

and

“4. That the Committee regrets that it did not have the opportunity to consider the consultation outcome results as part of its deliberations.”

Executive decision on Urban Extension

- 2.6.13. The Executive received a summary report of the consultations on the NDP as follows:-
“Consultation is still ongoing however preliminary results suggest that there is almost unanimous support for the regeneration that Option 2 might generate however the majority of respondents were in favour of Option 1. Responses from developers and housing associations however showed strong support for Option 2. Details of consultation will be made available in The Holme Wood and Tong Neighbourhood Development Plan Public Consultation Report”.
- 2.6.14. In consequence a decision was taken by the Executive on the morning of 20th January 2012 to adopt Option 2 for 2700 houses in Holme Wood as part of an urban extension, before consultation on the Core Strategy Further Engagement Draft closed later that afternoon.
- 2.6.15. As neither the Executive nor the Scrutiny Committee saw the NDP Public Consultation report before the strategic decision was taken to adopt the urban extension plans for Holme Wood it is our contention that the consultation process was fundamentally flawed, in that the timing of the decision was calculated to indicate to the public, still engaged in the consultation on the wider issues introduced by the Core Strategy, that consultation was not a real exercise in which views were fairly considered, even if not agreed with, but merely an exercise in form over substance.

Incomplete summary

- 2.6.16. The summary report given to the Executive was in our view heavily biased in favour of the Option 2 recommendation of the Officers. At no point is it apparent that the Executive was advised by Officers of the minority concerns of the Tong Partnership Board, nor that Leeds City Council had lodged a formal objection to the proposed extension (as the subsequently published consultation report showed). At no point was there any consultation with adjoining authorities, and when at the meeting of the Executive a petitioner suggested that the plans were of grave concern to residents in adjoining authorities, as well as to local residents, the Chairman of the Executive stated that Bradford would take its own strategic decisions about housing growth and

that it was of no concern either to other authorities or to residents outside Bradford what those decisions might be.

2.7. Why the process was flawed

- 2.7.1. It is our view that the substance of the wider public consultation was not fairly or fully recorded in the brief summary report given to the Executive before it took its decision on the Urban Extension.
- 2.7.2. We further contend that the cavalier way in which the NDP Consultation was dealt with prejudiced the effectiveness of the consultation on the Further Engagement Draft, in that residents were disinclined to participate further in an exercise in which their view could be similarly ignored, and there was confusion as to whether there was any point in making further representations on the issue of urban extension at Holme Wood outlined in the Further Engagement Draft, as the Council had clearly already decided the issue.
- 2.7.3. By making a decision on a key part of the Core Strategy before the wider public consultation had closed and before the Evidence Base supporting the Publication Draft had been assembled or even obtained the Executive pre-empted the process of preparation of the Plan.

Effect on Evidence base

- 2.7.4. The effect of this pre-emptive decision was that when the Evidence Base was assembled, it did not, in respect of the Urban Extension, provide support for the strategic proposal set out in the Plan, but rather set out the fact that the Urban Extension was Council policy and sought to provide retrospective justification for that established policy. The Urban Extension was therefore not subjected to an appropriate level of objective assessment.
- 2.7.5. As an example of a document included in the evidence base supporting the Publication Draft which has made the assumption that the Urban Extension was supported by the public consultation process on the NDP, we refer to page 11 of the "Bradford Growth Assessment – The Regional City of Bradford November 2013" authored by Broadway Malyan. This Growth Assessment, in assessing the effect of growth on the Green Belt in SE Bradford, states: *"The Holme Wood and Tong Neighbourhood Development Plan (January 2012) has previously identified potential green belt locations within the Holme Wood and Tong area. The potential location for regeneration and Green Belt growth within this neighbourhood plan were **supported** through public consultation"* This contrasts with the words on page 12 of the same document which reports that the Green Belt potential of Holme Wood *"has previously been **subjected** to public consultation....."* which we believe is a more accurate and appropriate statement, as the use of the word "supported" could lead the reader to the incorrect conclusion that local people were in support of the proposals.

2.8. Conclusion

Because:

- 2.8.1. the consultation process did not take place in the manner set out in the Further Engagement Draft;
- 2.8.2. the Council fast tracked the decision for the Urban Extension before consultation on the full Core Strategy had closed;
- 2.8.3. neither the Scrutiny Committee nor the Executive were in possession of a full and fair summary of the public views expressed through the consultation; and
- 2.8.4. the decision on this key element in the Core Strategy was taken without possession or consideration of an objectively determined Evidence Base,
- we consider that the Council has not complied with all the legal requirements applicable to the Local Plan and that it should not therefore at this stage be examined by the Inspector.

Particulars of the Tong and Fulneck Valley Association

We are a non-profit making Association whose objects are the conservation, protection, maintenance and enhancement of the Tong and Fulneck Valley and its environment. We are governed by a Board of Trustees. We have 497 members most of whom live within the immediate area of the Tong Valley, and many of whom are active users of the footpaths and bridle-ways within the Tong Valley either as walkers, cyclists, horse riders or lovers of the flora and fauna of the Tong Valley. This representation has been authorised by a resolution of the Board of Trustees dated 20 March 2014.

THE SCHEDULE

The Minority Report of the independent members of the Holme Wood and Tong Partnership Board

Holme Wood and Tong Neighbourhood Development Plan

Draft for Consultation (the Draft Plan")

Comments of the minority members of the Holme Wood and Tong Partnership Board (the "Board").

1. We are all the independent members of the community who sit on the Board. Three of us were appointed as local community representatives, and two of us serve as representatives of the Holme Wood Community Council.
2. At its meeting on 9 June the Board was asked a question which related to the inclusion of Option 2 within the Draft Plan. The resolution was passed on the casting vote of the Chairman (Cllr Alan Wainwright), with no independent community member voting in favour.
3. Option 2 is described at paragraphs 7.13 et seq. of the Draft Plan and includes three delineated areas of green belt. These are particularised in the consultation document at Key Concept (8) as Site 1 (300 New Homes adjoining the Holme Wood Estate ("Holme Wood") to the North east), Site 2 (1300 New Homes disconnected from and to the South east of Holme Wood between Raikes Lane and Westgate Hill) and Site 3 (500 new Homes between Site 2 and Tong Lane).

4. Holme Wood was developed from 1958 onwards on land standing at the head of the Tong Valley and, since then has been the subject of ad hoc green belt releases. Site 1 and Site 2 are separated by a section of green belt land forming the head of the remaining undeveloped part of the Tong Valley, and all three sites fall within the watershed of the Tong Valley, with the exception of a small part of Site 3 fronting Tong Lane which is at the head and within the watershed of the adjoining Cockersdale Valley. The Tong Valley falls on its south side within the boundaries of Bradford MDC and on its north side mainly within the boundaries of Leeds MDC. Cockersdale falls mainly within Leeds MDC.
5. The Board is unanimous in its desire to bring about a step change in the fortunes of Holme Wood, and we fully subscribe to the objectives set out at paragraph 4.2 of the Draft Plan.
 - 5.1. Objective 2 envisages the provision of a mix of good quality housing, and we are fully supportive of the need not only to upgrade and reconfigure the existing housing stock, but also for the provision of additional housing that would assist in creating a more socially mixed community.
 - 5.2. Objective 7 recognises the need to identify development sites to attract private developers to the area.
 - 5.3. Objective 5 recognises that the rural outlook and access to the countryside of Holme Wood and Tong creates a unique and highly desirable place to live.
6. All members of the Board have expressed their views that the preservation of the integrity of the Tong Valley provides a unique opportunity for residents of Holme Wood to gain immediate access to unspoiled countryside comprising high quality landscape, containing the historic villages of Fulneck (in Leeds) and the conservation village of Tong (in Bradford) as well as several Grade I and Grade II listed buildings of great historic and architectural interest. All members of the Board have expressed in the meetings of the Board a desire to retain the green belt surrounding Holme Wood, but acknowledging that some releases of less sensitive land may be required to meet Objective 7.
7. The Board agreed that Option 1 should be included in the public consultation. This provides for improvements to Holme Wood and development of infill sites within Holme Wood. These are shown as yellow on the plan at page 31 of the Draft Plan and in the public consultation document it is stated that there is the potential for up to 600 New Homes on such sites. This Option reflects the outcome of the public consultation exercise which took place in November 2009 where the public were given a range of options for the numbers of additional homes they would like to see in any development of Holme Wood, and where the overwhelming response was for 500 homes or fewer.
8. Board members, having regard to the latest forecasts for housing need, and the desire to achieve a "critical mass" in housing numbers to fund the infrastructural changes which are needed to meet the existing needs of the largest concentration of social housing in the District, as well as those necessitated by growth, were urged to consider that the latest consultation exercise should also offer an option for a greater number of houses on sites out of Holme Wood, and in the earlier part of the year a number of sites were suggested. However, at that meeting the suggestion that such sites be identified in the heart of the valley area, essentially to extend the Holme Beck Park estate, was strongly and universally opposed by all Board members..
9. The minority members of the Board are of the view that it is essential for the preservation of social cohesion within Holme Wood and the provision of infrastructure amelioration which both provides for the needs of the existing residents of Holme Wood as well as ensuring that any extension of Holme Wood is sustainable, that new housing developments are:-

- 9.1. focussed on Holme Wood as the centre for the community development area, and are of a scale that is proportionate to encourage healthy indigenous growth.;
 - 9.2. capable of providing residents with access to Bradford centre and the opportunities for civic services, education, skills training and employment provided by a revitalised Bradford centre;
 - 9.3. supported by adequate transport infrastructure, in particular by the upgrading of traffic flow in Tong Street and Westgate Hill and commensurate pedestrian support;
 - 9.4. accompanied, or preceded, by school and health provision proportionate to the increased housing numbers;
 - 9.5. aimed at providing a safe and socially cohesive community.
 - 9.6. Commensurate with identifiable employment opportunities.
10. The minority members were therefore unwilling to support Option 2 which was proposed as the only alternative to a development plan based upon Holme Wood alone because:
- 10.1. The numbers of additional new homes are disproportionately large for the growth needs of Tong Ward or indeed South Bradford. The Local Development Framework Core Strategy Further Engagement Draft envisages a total housing need for the regional City of Bradford including Shipley and lower Baildon to 2028 of 28,000. The total of 2700 New Homes proposed for the Holme Wood extension is therefore almost twice the average for the wards within the regional City of Bradford.
 - 10.2. Much of the green belt land that would be released if Option 2 were to be approved is land that is environmentally highly sensitive, both in terms of its position in relationship to neighbouring communities, and in the recreational potential it offers those communities. Such potential is already recognised and safeguarded in the use and protection of the neighbouring land that belongs to Leeds Metropolitan Council. It is particularly true of Option 2 land that is made up of Site 2 and Site 3. We are concerned that these are not issues that have received proper attention or evaluation by the Board.
 - 10.3. If Sites 1 and 2 were to be released from green belt protection and developed for housing we believe it is inevitable that this would lead to future release of land that lies between them.
 - 10.4. Whilst Site 1 does abut onto Holme Wood, Sites 2 and 3 (in this paragraph referred to as the "Stand-alone Estate") do not and lack sufficient physical connectivity with Holme Wood to be considered as being focussed on Holme Wood as a community centre.
 - 10.5. Indeed it is our deep fear that the construction of the Stand-alone estate would have the effect of detracting from the urgent need to provide step change improvements to Holme Wood.
 - 10.6. We also believe that the creation a physical division between the newly constructed Stand-alone Estate and Holme Wood would reinforce the sense of isolation and deprivation that may be perceived to apply to Holme Wood.
 - 10.7. We do not accept the case stated at paragraph 7.13 of the Draft plan that improvements in Holme Wood would be cross-subsidised by s.106 contributions and New Homes Bonus.
 - 10.7.1. We consider that it is probable that the Stand-alone Estate would require such a level of infra-

structure to be sustainable in its own right as to absorb all s 106 contributions (which is accepted in the contradictory statement at paragraph 7.17 acknowledging that such developer contributions would be absorbed). We are also conscious of the level of s106 debts which have not been recovered by local authorities in West and South Yorkshire, and that therefore raises concerns as to the dependability of this source of funding support.

- 10.7.2. We are sceptical that, in the current economic situation, a sufficient commitment would be given to dedicate New Homes Bonus receipts from the Stand-alone Estate to the regeneration of Holme Wood, given the extent of additional infrastructure cost that would arise as a direct consequence of the Stand-alone Estate development. It is clear from paragraph 7.19 that the Draft Plan envisages New Homes Bonus (if it were capable of being dedicated to the NDP) as being directed primarily to improvements in Tong Street. Our view is that Tong Street is a strategic transport issue to be addressed and funded at City level or regional level, and not by way of diversion of Holme Wood generated New Homes Bonus.
- 10.8. We do not believe that the “link road” shown on the Option 2 Plan would achieve the object stated at paragraph 7.15 “to properly connect the urban extension sites with the heart of the neighbourhood”. This road ends at Raikes Lane and as such comes nowhere near the “heart” of Holme Wood. The Draft Plan refers, at paragraph 5.82, to a “winding” route along Kesteven Road to Broadstone Way as a link with the new “neighbourhood”, but does not specify how this would be upgraded nor the consequences for the residents. We note with even greater concern that the LDF includes proposals for a much more radical “Bradford east link road” short circuiting Holme Wood across the central green belt land which we regards as needing the highest level of protection.
- 10.9. We support neither of these proposals for link roads, because we believe that the existence of the link road would actually generate “rat-run” traffic and exacerbate rather than relieve the problems of Holme Wood. It is difficult to see how this proposal can be reconciled with the recognition at paragraph 5.84 of the Draft Plan of the need to discourage extraneous through traffic from the Tong Valley.
- 10.10. We endorse the concerns expressed at paragraph 5.64 of the need to reduce congestion in Tong Street. We do not however endorse the proposal that a high occupancy traffic lane is a solution, and indeed this represents a fundamental failure to grasp the strategic significance for Bradford of the Tong Street congestion. We regard the need to tackle this issue as a pre-condition of any further house building outside Holme Wood. However we also recognise that any effective solution to Tong Street traffic congestion has got high financial implications, particularly if it ensures that there is minimal resulting social damage to the Tong Street Community. We note that ‘improving Tong Street’ is not a recent challenge, and we fear that it may once again prove to be little more than aspirational.
- 10.11. We consider the further delivery benefits described at paragraph 7.19 of the Draft Plan, namely the investment in Laisterdyke Station and the rapid transit route Bradford-Tyersal/Holme Wood Pudsey – Leeds to be at best aspirational, and requiring the co-operation of Network rail and the neighbouring local authority, which we understand has not yet been consulted.
- 10.12. At paragraph 6.10 it is stated in support of the Laisterdyke proposal that 50% of residences in Holme Wood and Tong are within 2 km (20 minute walk) of the proposed station. This clearly would not apply to any of the proposed new homes on the Stand-alone Estate. We strongly believe

that because of the proposed location of such homes, they would be heavily dependent on motor car access. This would place an enormous strain on the roundabout on the A650 at Westgate Hill, which already has traffic backing up down the Drighlington By-pass at rush hour, and would further add to the Tong Street congestion.

- 10.13. Additionally we are concerned that nowhere does the Option 2 analysis consider the effect on the conservation village at Tong of the proposed Stand-alone Estate. This village is already badly affected by traffic, particularly at rush hour and at the weekends, and undoubtedly, without draconian traffic measures, this problem would become significantly worse as traffic from the new development sought access to Leeds.
- 10.14. We should also note that the approach to Tong Village from Wakefield Road down the tree-lined Tong Lane would be seriously impaired by housing development on Site 3.
- 10.15. We believe that the only possible view that might be taken of a Stand-alone Estate on Sites 2 and 3 is that it would not be Bradford facing, would not contribute to the local economy of Holme Wood, would not look to Bradford as the natural centre for education, skills, civic services or employment, and hence not meeting our objectives at paragraph 9 above.

11. Further in respect of Option 2:

- 11.1. We understand that the local councillors who are members of the Board, who did support the inclusion of Option 2 within the consultation document said that they did so, having regard to advice from officers that the widest possible consultative options were desirable as a means of countering possible speculative planning applications within green belt land for which the council had not invited public consideration within the wider district housing plan. Some, including the Chairman on recording his casting vote, said that they were in fact opposed to the extension of housing development to the Tong Valley green belt and that they valued the benefits to the community which are afforded by this area of open and undeveloped countryside.
- 11.2. As independent members of the Board we take the view that we should support those provisions in which we believe, and have regard only to the interests as we see them of the local community in Holme Wood and Tong. For that reason we believe that the NDP should contain a strong statement that the community would not welcome a major release of green belt land in the Tong Valley particularly at Sites 2 and 3 and in the central valley east of Holme Lane. We would accept that small scale developments of land abutting the Estate and around the Yorkshire Martyrs site at Westgate Hill may be accepted.
- 11.3. We would also like to see the NDP contain a more positive statement as to the community benefit currently derived from the green belt land, the benefits of avoiding coalescence with the neighbouring authorities of Leeds and Kirklees through the defence of the green belt in South Bradford and at Tong, and a commitment to supporting community development of the Tong Valley countryside as an accessible recreational facility for Holme Wood and Tong and visitor attraction for residents across Bradford and in neighbouring authorities.

12. We do not know the outcome of the public consultation and do not wish to prejudge it. However we do wish it to be noted that the Board was not consulted on the form of the questionnaire used, and we should record that our experience from discussions within the community was that residents in Holme Wood found difficulty in addressing the apparently daunting format of the questionnaire. Not many residents felt

themselves sufficiently IT skilled to download all the documentation on the Council website, nor to respond electronically, and many who tried to complete 'hard copies' found the information and instructions confusing and complicated.

13. Finally we regret that the inclusion of Option 2 has led to the main concern of the Board, that of seeking the healthy long term social and community development of Holme Wood and Tong being overtaken by extensive green belt release proposals. In doing so important discussion and debate has inevitably been subverted.

The following members of the Board subscribe to the above views and comments.

Gordon Dey

Michelle Morgan

John Finnigan

David Wilford

Vie Lusandu

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.

We do not believe that a legal defect of this nature can be rectified.

However:-

if all references to the Urban Extension on the plan at Page 67, at Policy BD1 C.1 (page 73), Paragraph 4.1.3 (outcomes by 2030) (Page 64), Sub-area Policy BD2 E (Page 79) Paragraph 5.3.22 (page 158), Paragraph 5.3.34 (Page 161) Paragraph 5.3.35 (Page 162) Paragraph 5.3.37 (Page 162) Policy HO2 B 2 at Paragraph 5.3.37 (Page 163), Paragraph 5.3.42 (Page 164), Paragraph 5.3.61 (Page 169), Table 1 to Appendix 6 at Page 358 and Appendix 6 paragraph 1.9 (Page 363) were deleted and if the reference to the target number of 6000 in respect of SE Bradford at paragraph 5.3.38 were amended to 3,900 (reflecting the 2100 homes envisaged by the NDP to be constructed in a green belt release at Holme Wood) with the 2100 added as appropriate to other sector allocations either in the Regional City of Bradford or the wider District, and a statement included in Paragraph 3.103 (or elsewhere if appropriate) recognising the need to retain the green belt in the Tong Valley;

then the part of the Publication Draft which was the subject of the legal objection would no longer apply.

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, I do not wish to participate at the oral examination
YES	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:

I am not sure whether this question is appropriate to a legal representation, as I had understood that the inspector deals with these issues before commencing an examination. If however an oral examination does apply to legal representations then I would wish to be able to clarify or amplify any point which the inspector considers unclear or not fully explained in this written representation, particularly with reference to plans.

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:	Authorised by resolution of the Trustees of the Tong and Fulneck Valley Association dated 20 March 2014	Date:	24 March 2014
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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?			
Yes		No	I have an interest
2. Gender:			
Male		Female	Transgender
3. Age:			
16 or under		36 to 45 years	65 years +
16 to 25 years		46 to 55 years	
26 to 35 years		56 to 65 years	
4. Do you consider yourself to have a disability?			
No		Mental Health Issue	Hearing Loss
Physical Disability		Sight Loss	Deaf
Learning Disability		Blind	Other substantial and long term condition
5. Ethnic Origin:			
White English / Welsh / Scottish / Northern Ireland / British		Mixed Other	Black or Black British Other
White Irish		Asian or Asian British Indian	Chinese
White Eastern European		Asian or Asian British Pakistani	Arab
White Other		Asian or Asian British Kashmiri	Other
Mixed White / Black Caribbean		Asian or Asian British Other	Don't Know
Mixed White / Black African		Black or Black British Caribbean	Gypsy or Traveller
Mixed White / Black Asian		Black or Black British African	
6. Religion:			
No religion		Hindu	Sikh
Christian		Jewish	Other
Buddhist		Muslim	
7. Which of the following best describes how you think of yourself?			
Heterosexual / Straight		Gay	Lesbian
Bisexual		Other	
8. Equality Monitoring			
I do not wish to participate in this monitoring exercise			X