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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		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address		
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?

Sections	3 4 5	Paragraphs	<p>Key Diagram –Location Strategy and Key page 66/7</p> <p>4.1.3</p> <hr/> <p>5.3.22 5.3.34 5.3.35 5.3.37 5.3.42 5.3.61</p> <hr/> <p>Appendix 6 Table 1 page 358 Appendix 6 Paragraph 1.9 Page 363</p>	Policies	<p>Sub-Area Policy BD1 C 1.</p> <p>Sub-Area Policy BD2 E</p> <p>Policy HO2 B 2.</p>
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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	

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 Plan is unsound in that it is not positively prepared.
- 1.2. We do not believe that the strategy set out in the Plan, insofar as it relates to the urban extension mentioned in paragraph 1.3 below, has objectively assessed the development and infrastructure requirements of the District and in particular the SE Bradford sector of the regional City of Bradford.
- 1.3. Our representation specifically relates 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 (the "Council" or "Bradford") strategy to provide 42,087 new homes by 2030.
- 1.4. 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).
- 1.5. The Urban Extension was first proposed publicly in implied terms at the Further Issues and Options stage of the preparation of the Plan in November/December 2008, and in specific terms in the consultations which took place on the proposed Holme Wood and Tong Neighbourhood Development Plan (the "NDP") referred to in paragraph 1.9 of Appendix 6 to the Publication Draft. In the form adopted by the Council on 20 January 2012, the NDP provides for the construction of 2700 new homes in and around the existing Holme Wood estate of which 2100 new homes are scheduled to be built in the Green Belt on sites identified as Site 1, Site 2 and Site 3 on the plan at page 13 of the NDP Delivery Plan, and as SHLAA sites on the plan (the "SHLAA Site and Strategic Parcels Map: Bradford SE") at page 10 of the Bradford Growth Assessment prepared for the Council by Broadway Maylan and dated November 2013 (the "Growth Assessment").
- 1.6. We contend that the Publication Draft is not positively prepared, in that the size and location of the Urban Extension, and the infrastructure requirements to ensure that it could be a sustainable development, were not objectively assessed prior to the adoption of the NDP. We contend that the assumptions (particularly as to housing growth requirements within the District as a whole) driving the NDP had changed before the publication of the Publication Draft but that the NDP has subsequently been accepted for incorporation into the Core Strategy as a "fait accompli" without due consideration of or provision for alternatives to the large scale Green Belt release proposed.
- 1.7. Furthermore we contend that insufficient consideration has been given to the possibility of satisfying the development and infrastructure requirements of the Urban Extension within the time scales assumed in the Publication Draft or at all.

2. Particulars of Representation and supporting evidence

Other representations

- 2.1. We have submitted separate representations, on legal grounds arguing that the consultation arrangements relating to the NDP and the Core Strategy: Further Engagement Draft (the "Further Engagement Draft") were flawed and that the Duty to Cooperate was insufficiently observed in respect of that part of the Core Strategy which relates to The Urban Extension. The arguments set out in those representations have application also to the issue of whether the Plan has been positively prepared. We are also submitting further and separate representations on soundness relating to effectiveness, justification and accordance with national policy. There is therefore some repetition of background information in this and those other representations, and where appropriate particulars and evidence

set out in our other representations should be incorporated by reference in this representation.

2.2. In relation to the proposed Green Belt release at Holme Wood:-

Funding regeneration at Holme Wood

2.2.1. It appears to us that the purported need for large scale Green Belt release at Tong Valley results to a substantial degree from a belief that this was a neat way to combine the then perceived housing growth needs of the District with a means to maximise funding opportunities for the specific local regeneration programme in Holme Wood described in the NDP. We examine this assertion at paragraph 2.2.11.2 below.

Reduction in Target numbers within the District

2.2.2. When the concept of an urban extension at Holme Wood was first proposed at the Further Issues and Options Stage in 2008, it was in the context of the suggestion that one way to achieve the housing targets for the District was to include an urban extension or urban extensions. At that time the target number given for new homes was 50,000 for the relevant period. This number reduced to 45,500 in the Further Engagement Draft (Paragraph 3.2.39 of the Further Engagement Draft) of which 6000 new homes were allocated to SE Bradford. However in the Publication Draft the number has reduced to 42,087 (Paragraph 5.3.13 of the Publication Draft), a reduction in excess of the total number of houses proposed for the Urban Extension.

No reduction in Target numbers for Holme Wood

2.2.3. However the Publication Draft still allocates 6000 new homes to SE Bradford. This means that over 14% of new homes in the District are now allocated to SE Bradford, placing a disproportionate number of homes on the urban fringe and placing a disproportionate level of infrastructure burden on the adjoining authorities of Leeds MDC and Kirklees MDC.

2.2.4. Whilst some of the reductions in allocations of new homes to other parts of the District are explained by specific valid local considerations, there is clearly flexibility in potential allocations which is not reflected in the Publication Draft, and in our view the need for the full scale Urban Extension at Holme Wood, based on overall District requirements, has not been tested sufficiently.

2.2.5. This is clear from the statement made by the Housing Minister Kris Hopkins MP in January 2014 to the Telegraph and Argus (the local daily newspaper circulating in Bradford). Criticising the allocations of Green Belt land in the Publication Draft, Mr Hopkins said that in Bradford's Canal area *"There is a great opportunity for 20,000 houses. I'd like to see that project expand and accelerate."*

Mr Hopkins, as a local MP and former leader of Bradford Council, also said *"It is an easier process for the Council to look around its green fields – the leafy bits of the district. It needs to go back into the centre and ask, 'Where are the brownfield sites?' 'How can we bring the empty homes back into use?' "*

(The full text of Mr Hopkins statement as reported in the Telegraph and Argus is set out in the Schedule to this representation.)

Incorrect assertions of support for the Urban Extension

2.2.6. The Growth Assessment assumes, at page 11, that the Urban Extension was a settled policy and (wrongly) states that the NDP had been "supported" through public consultation. The location and numbers are not therefore subjected to the same level of scrutiny as the Growth Assessment

applies to other parts of the District.

2.2.7. In fact the plans for expansion into the Green Belt were strongly opposed in the public consultations (see Core Strategy Statement of Pre-Submission Consultation Issues and Options Stage (2011) and Core Strategy DPD: Further Engagement Draft Statement of Pre-Submission Consultation (2013).

2.2.8. Indeed the Urban Extension plans were further opposed by a petition of over 1000 local signatories.

2.2.9. Finally the extent of the Urban Extension and the resultant Green Belt incursions were opposed by all the independent local community representatives on the Holme Wood and Tong Partnership Board, who were so concerned that the long term social and community development of Holme Wood and Tong was being subverted by the drive for disproportionately high housing development in the neighbourhood that they produced and signed a Minority Report which was delivered to the Council. An extract from the Minority Report is included in the Schedule to this representation. (The full Minority report as delivered to the Council is set out in our legal representation relating to the flawed consultation process.)

The Council's Objectives in adopting the Urban Extension as Council policy

2.2.10. The Council's objectives are stated at paragraph 5.2.34 :

"Holme Wood is a case in point. Here comprehensive proposals involving both the more efficient use of existing land by remodelling existing areas of underused land, and linking built and open spaces more successfully have been combined with proposals for an urban extension. The combination of these proposals will secure significant funding for the improvement of the existing urban area. These proposals have been progressed via the production of a local neighbourhood plan led by the Council in partnership with local members and stakeholders."

2.2.11. We have two concerns about this statement.

The neighbourhood plan is not supported in the neighbourhood

2.2.11.1. Firstly the reference to *"a local neighbourhood plan"* is misleading, as was the use of the term *"Neighbourhood Development Plan"* in the context of the NDP. Appendix 1 part 2 to the Publication Draft (Glossary of LDF Terms) (*sic*) does not appear to have been updated since an earlier draft (another reason why the Plan is not properly prepared). It states *"Neighbourhood Development Plan (NDP) - The Localism Act (2011) will allow Neighbourhood Forums and Parish Councils to use new neighbourhood planning powers to establish general planning policies for the development and use of land in their area. This will be known legally as a Neighbourhood Development Plan and will need to conform with the key policies of the Local Councils"*. It would appear therefore that the Holme Wood and Tong Neighbourhood Development Plan is not a neighbourhood development plan as defined in Appendix 1, nor does it conform to s.38A Planning and Compulsory Purchase Act 2004 as amended by the provisions of Schedule 9 Part 2 of the Localism Act 2011. There is no Neighbourhood Forum or Parish Council in the Tong area of the District, and therefore the NDP has not been subjected to a local referendum. Furthermore the NDP was produced by the Council and voting membership of the Holme Wood and Tong Partnership Board (the Partnership Board") included councillors and council officers, so was not independent of the Council in any sense. Those community representatives on the Partnership Board opposed the large scale development in the Green Belt. We believe that the Council thought when it started the Tong and Holme Wood NDP consultation that the NDP would fall within the provisions of the Localism Act, as officers indicated that the NDP would be subject to

inspection, which they now indicate is not the case.

The concept of leverage of funding

- 2.2.11.2. Secondly the premise that the Urban Extension will produce significant leverage of funding for the regeneration of Holme Wood has not been tested at any level.
- A) The NDP assumed that the s.106 regime would apply. However the NDP itself says at paragraph 7.17 of the Final Report: *“However, developer contributions may also be absorbed by requirements for on/off site infrastructure arising from development of the site, limiting the potential for contributions to other regeneration interventions within Holme Wood.”*
 - B) The Council has not, either in the Publication Draft or in any other document that we can find, given any commitment to subvent or apply New Homes Bonus (“NHB”) (if the same still exist when the Urban Extension is commenced) to the regeneration of Holme Wood. Even if the Council applied all the NHB Bonus generated from 2700 houses, this would contribute (at current national average NHB rates of £1,474 per house) only £4m.
 - C) The Council has not mentioned the Local Infrastructure Fund (“LIF”) in its proposals relating to the Urban Extension, although this is one of the regeneration funding tools mentioned at paragraph 6.52 of the Publication Draft. The LIF is available to large scale developments on single sites to provide 1500+ houses, and it may be that in scaling the Urban Development, the Council had this type of fund in mind. If that is the case it again shows that funding and not housing growth needs in SE Bradford is the driver behind the Urban Extension proposal.
 - D) The only infrastructure costing figure of significance that we can find in published papers is the estimated cost of the proposed estate road linking the Urban Extension to the A650 at Westgate Hill. This is estimated at £40m. (CBMDC Local Infrastructure Plan October 2013 Page 143). That cost is only a part of the infrastructure needed to support a new settlement at Tong/ Holme Wood.
 - E) To suggest that by building 2700 more houses near to Holme Wood there would be infrastructure cost surpluses sufficient to regenerate the existing estate is questionable economics, but to commence the Urban Extension without undertaking the regeneration of Holme Wood would be contrary to all that the Council has said to the local residents.
- 2.2.11.3. We wholly support the more efficient use of existing land within Holme Wood. We would also specifically support a smaller scale release of Green Belt land to the north / north-east of Holme Wood, producing total growth of up to 900 new homes, subject to the necessary infrastructure being put in place. Such a development would in our view be fully sustainable.
- 2.2.11.4. However we believe that, in going beyond that scale of development, the construction of a further 1800 houses in the Green Belt, in a “stand-alone” estate, substantially separated from the existing Holme Wood estate, would create sustainability requirements of its own. This means that the funding raised from the additional scale of development would be required to support that development and not the regeneration of Holme Wood. The Council’s main justification for locating the Urban Extension at Holme Wood is therefore unsubstantiated.

Infrastructure issues related to the Urban Extension

2.3. In relation to the infrastructure issues:-

2.3.1. Because at least 1800 homes within the Urban Extension are predicated to be separated from the

existing estate and located at Tong Lane and Westgate Hill, right on the Leeds/Bradford/Kirklees boundaries, the knock-on infrastructure support becomes increasingly a burden on adjoining authorities.

Transport/highways

2.3.2. Our prime concern relates to the transport infrastructure implications of the Urban Extension.

2.3.3. The extent of the transport infrastructure requirement for the Urban Extension is understated in the Publication Draft. It is however more accurately stated in the "CBMDC Local Infrastructure Plan October 2013" (the "Infrastructure Plan"). This states, at page 49, that *"Highway Agency and the CBMDC Bradford District-wide Transport Study (2010) have highlighted that the planned growth and development in and around these areas [incl. Holme Wood] will see significant additional demand and impacts on the A650 route to M62 and on the A647 between Bradford and Leeds ring-roads."* And, at paragraph 6.2 on page 121, *"It is apparent that upgrades to the transport infrastructure are deemed to be the most important component in unlocking these developments [incl. Holme Wood]. In light of uncertainties in major transport infrastructure funding, important decisions are required as to the approach on these development sites – with the prospect of phased delivery, allied with smallscale infrastructure improvements seeming more likely in the short to medium term, rather than waiting for major infrastructure investment to take place before any development occurs."*

The East Bradford Link Road

2.3.4. The Core Strategy Further Engagement Draft, at pages 87/88, contained a proposal for an "East Bradford Link Road" between the A650 and the A6177 to the east of the Urban Extension. In an application to the West Yorkshire Transport Plus Fund in March 2013 this East Bradford Link Road was described as:-

"A new highway link from the A650 to the A6177 in South East Bradford. The route will link to the A651 to North Kirklees and A650 Westgate Hill roundabout. The scheme also involves improving Bowling Back Lane between the A650 roundabout and Sticker Lane. This will provide an alternative route for traffic between Bradford City Centre and Thornbury Gyratory."

The alternative Access Route

2.3.5. However the Publication Draft contains no reference to this road. Instead it refers, at Figure BD1 at page 76, to *"SE Bradford improvements"*, and in presenting the Publication Draft to Council on 10 December 2013, the Portfolio Holder said that there was "no plan" for an East Bradford Link Road and that access to the new housing would be along the lines of the existing highways.

2.3.6. In a response to a written request, The Principal Engineer – Transport Planning at Bradford MDC Department of Regeneration has said by e-mail dated 14 February 2014 *"We are now looking at the option for access to potential new development in the Holme Wood area that was identified in the Holme Wood and Tong Neighbourhood Development Plan which provides a route from Westgate Hill Street through the new development to link in to the existing highway network at Holme Wood."* The road proposals are described as "conceptual" only and are not proposed to be fully worked up until details of proposed housing allocations in the area are known.

Conflicting timing for road infrastructure

2.3.7. The Infrastructure Plan includes, at page 143, the following description of a road to serve the Urban Extension:

"Construction of a new access route from the A650 Westgate Hill Street to Holme Wood to serve

urban extension”

It is described as a “Long Term” delivery phase project estimated at 10-15 years and is costed at £40 million.

- 2.3.8. However the Publication Draft anticipates at page 358 that by years 4-8 of the Plan “*Work on growth areas [will be] beginning to show results i.e. Canal Rd and Holme Wood Urban Extension*”. This contrasts with Strategic Policy SC5 on page 49 of the Publication Draft which states that in determining the order of development “*Fourth priority [will be given to] to larger urban extensions in sustainable locations*”.

Lack of positive presentation in respect of transport/highway infrastructure

- 2.3.9. It is our contention that the Plan shows lack of positive preparation in relation to the extent of the need for infrastructure to support the Urban Extension, without which it, or at least the part not immediately attached to Holme Wood, will not be sustainable.
- 2.3.10. We argue that, since the NDP recognises, in detailed terms, that one reason why Holme Wood requires immediate regeneration is the inadequacy of the existing infrastructure, particularly the highways and transport infrastructure, it would be wholly unproductive and positively damaging to proceed with an Urban Extension within the phase 4-8 years as proposed on the basis suggested in the Infrastructure Plan of “*phased delivery, allied with smallscale infrastructure improvements*”.

Highway infrastructure should precede development

- 2.3.11. Our view is that, unless the Plan recognises that the implementation of material infrastructure improvements should be a pre-condition of commencement of work on the Urban Extension, the development would be unsustainable; and as the construction of an access road cannot be dealt with inside a 10-14 year time frame, and as there is no time frame at all, nor any funding, for the necessary further road improvements mentioned below, it is wholly unrealistic to regard the Urban Extension as being likely to make any substantial contribution to housing numbers in the period 2014-2030.

Re-allocate housing where the development will be sustainable

- 2.3.12. The Plan should accordingly reallocate housing numbers to other parts of the Regional City of Bradford where there are realistic plans within the appropriate timescales to provide adequate highways infrastructure.

Broader need for upgrade to A 650

- 2.3.13. Our concerns about highways infrastructure are not limited to an access road to the Urban Extension.
- 2.3.14. We would argue that, even if the Plan contained no reference to the Urban Extension, it should include, as a specific and priority requirement, to help unlock the economic potential of SE Bradford, road improvements to the A650. The reference to “*SE Bradford improvements*” in the Plan is insufficiently specific and indicates a lack of clear strategic vision by Bradford of the infrastructure required for this part of the District.

- 2.3.15. The A650 between Westgate Hill and Tong Street is the most congested road in the Regional City of Bradford with traffic speeds from 7.30-9.30 and 12.00-18.00 at between 0 and 5 kph for part or all of its length. (Holme Wood and Tong Neighbourhood Development Plan Baseline Report

11 August 2010 paragraph 2.3 page 40-46 and paragraph 3.1 page 47-48) Bradford has had unfulfilled plans for many years before the Urban Extension was mooted to widen the A650 along this section.

2.3.16. According to a Report of the Strategic Director Regeneration and Culture to the Council's Executive Committee on 12 March 2013 paragraph 11.1 and Appendix A, it applied to the West Yorkshire Transport Plus Fund in March 2013 for *"Highway widening on the A650 to increase capacity at junctions and allow for either a bus lane or a High Occupancy Vehicle Lane from the A650/A651 Westgate Hill Street to Knowles Lane. There are also provisions for an inbound priority lane on Westgate Hill Street east of the A651."* The high occupancy lane referred to was installed in 2013 and removed before the year was out as being totally ineffective in improving traffic flow or public transport punctuality or usage.

2.3.17. The modest improvements proposed for Tong Street/Westgate Hill are not likely to eliminate, but may alleviate to a degree the existing traffic congestion. Quite apart from any additional housing, Bradford estimates that car journeys will increase between 2010 and 2020 by 15% across the District. (see page 48 of the Holme Wood and Tong Neighbourhood Development Plan Baseline Report 11 August 2010 at paragraph 3.1) Car usage in Bradford District is significantly higher than the national average (71% commute by car against 63.1% nationally) and from Tong 57.4% travel to work by car against 74.4% of people who work in Tong travelling by car. (see page 39 of the Holme Wood and Tong Neighbourhood Development Plan Baseline Report 11 August 2010 at paragraph 2.2.2) Bradford was advised in the Sustainability Appraisal (see page 210 of the Sustainability Appraisal Full Report by Amec February 2014) that in respect of new housing in Holme Wood *"there are limited services/facilities within walking distance of the fringe of Holme Wood. Residents may therefore travel by car to access services/facilities elsewhere"*. It therefore seems a reasonable assumption that the proposed 2700 additional new homes, intended according to Bradford's policy to bring about a more equal mix of private/social housing in Tong Ward, will generate a significant amount of additional traffic, particularly at peak time.

Wider implications of traffic volume growth

2.3.18. Bradford clearly envisages that traffic from the Urban Extension would access the existing highway network at Westgate Hill roundabout. The A 650 at this point continues across the Leeds boundary towards the M62/M621 along the Drighlington by pass, or on a local road, the B 6135 Westgate Hill Street to Drighlington in Leeds, or via Tong Lane to Tong Village, a conservation area with a 20mph speed limit and traffic calming.

2.3.19. However Tong Lane is still used as an alternative route into Leeds and is becoming congested at peak hours with adverse effects on the quality of the conservation area. The construction of 2700 houses at the head of Tong Lane will inevitably lead to even greater use of Tong Lane by traffic from the new estate seeking alternative routes into Leeds (or indeed Bradford through Pudsey).

2.3.20. The highways infrastructure proposed the Publication Draft and clarified by the Principal Engineer is, on any objective assessment, inadequate to support a housing development of 2700. Furthermore the suggestion that access and egress from this estate would be through the existing highway structure of the existing Holme Wood estate is completely contrary to the concept of estate regeneration and improvement of quality of life for people on the estate.

Conclusion

2.4. Our contention is therefore that the Urban Extension is unsustainable at the scale envisaged and within the timescale of the Core Strategy. The strategy for transport and highways infrastructure in SE Bradford is not clearly articulated and reveals a background of indecision and division within the

Council. Accordingly, in view of the key role the Urban Extension plays in the overall housing strategy of the Plan we say that the Plan is not positively prepared.

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.

SCHEDULE

Part A

Statement Kris Hopkins M.P. Minister of Housing to Telegraph & Argus

'We don't need to build on green land' says housing minister Hopkins

6:00am Tuesday 14th January 2014

Exclusive By Rob Merrick

New Housing Minister Kris Hopkins today denies Bradford has a homes crisis – and accuses Council chiefs of failing to exploit the “huge amount of land on offer”.

In an interview to mark three months as a minister, the Keighley MP rejected the “crisis” word used by the National Housing Federation to describe Bradford’s plight.

Instead, Mr Hopkins – while admitting to a “challenge” – called for a redoubling of efforts to provide the extra thousands of new homes the district needs.

But he also vowed he would be “pushing back” to protect green fields in his own constituency, despite David Cameron’s orders to hit housebuilding targets.

Mr Hopkins said the extra homes could be found by:

- *Looking to Bradford’s canal area – saying: “There is a great opportunity for 20,000 houses. I’d like to see that project expand and accelerate.”*
- *Bringing empty homes – which were particularly common in areas with large Asian populations – back into use | Identifying and selling off local Council-owned land – allowing the authority to tap into extra Government funds.*

Mr Hopkins said: “The word crisis has been rolled out time and time again. I think there’s a challenge that needs to be addressed.

“I think the Council is facing up to it in its local plan, but Bradford itself is not short of land – particularly around the canal area.

“When I look back to the stock transfer, there was a huge amount of land retained by the Council on our old housing estates. We need to utilise some of that.

“It’s not just about building new houses, but about getting empty houses back into use as well. If we can do that, we can really make a difference.

“Lots of grandparents and parents went out and bought homes, particularly in Kashmiri and Pakistani communities, and we need to make sure those empty houses are brought back in.”

Growing pressure to build more homes has sparked fears that the district’s green and beautiful spaces will be concreted over – but Mr Hopkins insisted that was unnecessary.

Indeed, he vowed to stand shoulder-to-shoulder with residents in the Wharfe Valley against what he described

as “outrageous” housebuilding targets.

The minister said: “The challenge is in the centre. The housing population boom is not in Keighley and Ilkley – it’s in the centre of Bradford.

“Taking my ministerial hat off and putting my MP’s hat on, some of the figures they’ve talked about across Keighley and Shipley are outrageous.

“I’m sure Philip Davies would say the same and we will certainly be pushing back on those.

“There’s one road running through the centre of the Wharfe Valley and it couldn’t cope. Look at Addingham, where I think 5,000 houses was suggested, a ridiculous number.

“It is an easier process for the Council to look around its green fields – the leafy bits of the district.

“It needs to go back into the centre and ask, ‘Where are the brownfield sites?’ ‘How can we bring the empty homes back into use?’ “

Fears of a Bradford housing crisis were stoked late last year, when the National Housing Federation warned “prices were spiralling out of the reach of people”.

The average house price is £142,000, yet average annual earnings are £18,500. Meanwhile, more than 20,000 people are stuck on a waiting list for social housing.

Labour-run Bradford Council has acknowledged the district needs an extra 42,000 homes by 2030, which involves building more than 2,000 each year, but only about 900 are built, of which only a small proportion are “affordable”.

The report came out around the same time as official figures revealed the number of affordable homes built across the country had plummeted by 26 per cent.

But Mr Hopkins insisted: “The Prime Minister has asked me to go out and deliver our housing commitment.

That’s 170,000 affordable houses – to build them all by 2015.

“We’ve built nearly 100,000 already, so – with 16 months to go to the election – we are slightly ahead of target.”

Part B

Extract from Minority report of the Holme Wood and Tong Partnership Board

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

“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.”

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.

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) should be deleted and the reference to the target number of 6000 in respect of SE Bradford at paragraph 5.3.38 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;

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:

Whilst we have endeavoured to put our case clearly we feel that it may help clarify any areas of uncertainty, and to ensure that there is full co-ordination of evidence in relation to each of our representations if we were to be examined orally.

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.

