



For Office Use only:		
Date		
Ref		

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	BRADFORD	
Line 4	[REDACTED]	
Post Code	BD4 [REDACTED]	
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.

For Office Use only:			
Date			
Ref			

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

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.

Grounds of Representation

We contend that the Plan is unsound in that it is not justified as being the most appropriate Strategy.

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.

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).

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").

We contend that the Publication Draft is not justified in that: a) we do not feel that the proposal for the Urban Extension at Holme Wood, with the large scale Green Belt release envisaged, is the most appropriate strategy for the District; and b) we do not believe that the Publication Draft contains sufficient evidence of consideration of the alternatives, or indeed for a second option should the funding for the necessary major highways infrastructure not be forthcoming, or if other authorities do not co-operate in the provision of infrastructure to support an urban fringe development in Bradford.

Furthermore we agree with the opinion very recently expressed by the Minister of Housing that Bradford could and should adopt a strategy of accelerating and expanding housing development in the Canal Road corridor.

We also believe that other strategies should be explored in the light of changing economic circumstances.

We would propose therefore: a) the deletion of reference to the Urban Extension at Holme Wood; b) the reduction of the numbers of homes in the SE Bradford sector by 1800 (the difference between the 2700 proposed for Holme Wood and the 900 which we believe to be a sustainable level of expansion for the estate); and c) the redistribution of the 1800 homes deleted from SE Bradford to Canal Road and areas outside the Regional City of Bradford; / or d) the overall numbers of houses for the District being reduced by 1800 to 40,287. We also request a clear statement in the Core Policy that there is no proposal for large scale Green Belt release in the Holme Wood or Tong area.

Particulars of Representation and supporting evidence

1. We have submitted as requested separate representations on the grounds that the Plan was not positively prepared, is not effective and does not comply with national policies. Therefore a number of points made in those representations are duplicated here. We have also 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 is

justified. Where appropriate particulars and evidence set out in our other representations should be incorporated by reference in this representation.

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

- a) It appears to us that the need for large scale Green Belt release at Tong Valley results primarily from a desire to maximise funding opportunities for the still, apparently, un-costed regeneration programme in Holme Wood at a time when the economy was at a low point, and that this motivation has taken priority over any objectively assessed need for that number of houses (2700) at that location.
- b) The premise that the Urban Extension will produce significant funding for the regeneration of Holme Wood has not been tested at any level. 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."* The Council has not, either in the Publication Draft or in any other document that we can find, given any commitment to apply New Homes Bonus (if the same still exist when the Urban Extension is commenced) to the regeneration of Holme Wood. The only figure of significance that we can find in published papers is the cost of the proposed estate road linking the Urban Extension to the A650 at Westgate Hill, which 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. To suggest that by bringing 2700 more houses into an area there would be infrastructure cost surpluses sufficient to regenerate the existing Holme Wood estate, which is of similar size to the Urban Extension, is questionable economics.
- c) When the urban extension at Holme Wood was first proposed in 2008, it was suggested that the only way to achieve the housing targets for the District was to include such an urban extension. At that time the target numbers given were 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 were allocated to SE Bradford. However in the Publication Draft the numbers have reduced to 42,087 (Paragraph 5.3.13 of the Publication Draft), a reduction in excess of the total numbers proposed for the Holme Wood urban extension. Nonetheless the Publication Draft still allocates 6000 to SE Bradford. This means that over 14% of new homes in the District are 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.
- d) 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 a full scale Urban Extension at Holme Wood, based on overall District requirements, has not been tested sufficiently. This is clear from the statement made by the Housing Minister Kris Hopkins MP criticising the allocations of Green Belt land in the Publication Draft, 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."* (The full text of Mr Hopkins statement as reported in the Telegraph and Argus is set out in the Schedule to this representation.)
- e) We also consider that Bradford should have taken a much broader view of its housing ambition within the Core Strategy. Bradford has suffered serious economic decline and has in particular been hit by the consequences of its failure to develop the City Centre retail outlets in the way intended, with the seven year delay in the commencement of work on the Westfield Shopping Centre following on from the demolition of large swathes of the then existing retail outlets. This has resulted in a spiral downward in the quality of shops in the city centre, large numbers of shops with short lifespans, and empty premises. In this period on-line shopping has also resulted in a radical rethink of the function of the city centre retail outlet. We consider that Bradford should have taken the opportunity in its Core Strategy to review entirely the function of the high street. In doing so we believe that the use of a significant number of

city centre premises could be reconsidered, with city centre housing part of that review.

- f) The Growth Assessment assumes at page 11 that the Urban Extension at Holme Wood was a settled policy and wrongly states that the NDP had been “supported” through public consultation, when 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). Indeed the Urban Extension plans were further opposed by a petition of over 1000 local signatories. Finally the Green Belt incursions were not supported by the Minority Report signed by all the independent members of the Holme Wood and Tong Partnership Board. The Minority Report is included in the Schedule to this representation.
- g) 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.”
- h) We wholly support the more efficient use of existing land within Holme Wood and a modest small scale release of Green Belt land to the north / north-east of Holme Wood, producing growth of up to 900 new homes, provided that infrastructure is improved. Such a development would in our view be fully sustainable. However we believe that, in going beyond that scale of development, the building of further urban extension in the Green Belt, substantially separated from the existing Holme Wood estate as proposed in the NDP assumes sustainability requirements of its own. This means effectively that the funding raised from the additional scale of development will be required to support that development and not the regeneration of Holme Wood.
- i) As well as the inappropriateness of the size of the Urban Extension and its fragmentation into two distinct disconnected estates, there are substantial social and economic reasons why its construction would not be the most appropriate strategy for Bradford. These were explored in the Minority Report and we would wish to bring those reasons into evidence. They do not seem to have been considered in the Core Strategy and there is nothing in the supporting Evidence Base to suggest that there has been an objective assessment of these objections.

Conclusion

The Plan is not justified because; a) the Urban Extension is not the most appropriate strategy for the District having regard to its size, location and potential lack of sustainability; b) there is great uncertainty as to the costs and timing of the infrastructure needed to support the Urban Extension; c) there is insufficient objective evidence of the regeneration funding requirements relating to Holme Wood; d) there is insufficient objective evidence or a sufficiently well worked funding plan to assess whether claims that the Urban Extension would produce development surpluses sufficient to regenerate Holme Wood, or whether claims that the Urban Extension would leverage funds into Holme Wood are true; e) there are significant social and economic reasons why the Urban Extension would not produce the benefits claimed which have not been objectively assessed; and f) there are credible alternative strategies to meet the housing targets for Bradford not involving the urban Extension which have not been subjected to sufficient objective assessment.

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 Phillip 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

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 infrastructure 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.

██████████ Dey

██████████ Morgan

██████████ Finnigan

██████████ Wilford

██████████ 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.

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 amplify points and 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. It would be particularly helpful to be able to refer to relevant 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
----------------------	---	--------------	---------------

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.

