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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	SMITH	
Job Title <small>(where relevant)</small>		
Organisation <small>(where relevant)</small>		
Address Line 1	[REDACTED]	
Line 2	TONG	
Line 3	BRADFORD	
Line 4	WEST YORKSHIRE	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 24th 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.

This representation is one of 7 I have made on the grounds of Legal, Duty to Co-operate and Soundness .

They all relate to the Core Strategy Development Plan Document Publication Draft in particular those parts which refer to the Urban Extension at HolmeWood.

There will therefore be some duplication and equally, to minimise repetition, there are factors and details in the other representations which support this one.

1. Grounds of Representation

- 1.1. The Plan is unsound in that it is not positively prepared.
- 1.2. The strategy set out in the Plan, relating to the Holmewood Urban Extension has not objectively assessed the development and infrastructure requirements of the District and in particular the SE Bradford sector of the regional City of Bradford.

2. Particulars of Representation and supporting evidence

2.1. Regarding the infrastructure issues:-

- 2.1.1. There is no attempt in either the NDP or the Core Strategy to show how any of the infrastructure requirements of such a large new community will be achieved.
- 2.1.2. Because at least 1800 homes within the Urban Extension are to be 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.
- 2.1.3. To describe the development as a HolmeWood Urban Extension is misleading and does not pass even the most basic common sense test. HolmeWood clearly does not have the infrastructure to cope with a development of this scale. Furthermore only the westernmost 300 new home proposals for the Green Belt will be adjacent to HolmeWood. The further 1800 (nominally) destined for sites 99 & 100 are separated from HolmeWood by existing estates at Denbrook, Montserrat, Mossdale and Holme Beck. The NDP itself identifies that these areas, parts of which pre-date the HolmeWood estate, are not integrated with HolmeWood and common sense says that the new houses destined for the Tong Valley Greenbelt, some of which will be some distance away, are even less likely to be integrated. This is especially so as developers and potential new home owners, will be inclined to 'distance' their developments due to the difficulties HolmeWood suffers, well documented in the NDP. The very minor changes to the shopping areas within HolmeWood outlined in the NDF and expected to attract patronage from the new developments once again does not pass a basic common sense check and it is disingenuous for Bradford to claim otherwise.
- 2.1.4. Bradford is the 3rd most congested city in the UK and the A650 Tong Street is the most congested road in the city. Recent expenditure to improve traffic flow was a failure and further expense was necessary to revert. To build 6000 new houses in South East Bradford, nominally 2700 of which are in the HolmeWood/Tong Valley area, without a clear, costed, sustainable transport solution at the outset is foolhardy. This is especially so as the Bradford documents, particularly the SHLAA, featuring site 101, clearly indicates that Bradford Council even at this early stage have aspirations to build far more houses than the 2700 stated in the Core Strategy in the HolmeWood/Tong Valley areas. Simple maths almost doubles this number.

- 2.1.5. There is confusion about Bradford's intentions regarding road provision for the Urban Extension.

There is conflicting evidence regarding a proposal to build a new highway link road from Westgate Hill through the proposed development in the Tong Valley all the way through to Leeds Road at Thornbury, or simply to provide the proposed new community with an access road from a similar point on Westgate Hill

Each of these solutions has significant issues attached.

If the former (link Road) solution is chosen, it will need to be done in partnership with the broader West Yorkshire Plus Transport Fund and Leeds City Area and the timescale will be significantly longer than that proposed for the commencement of the urban extension. It will also mean greater devastation of the Green Belt and will result in a bigger impact on the ecology and visual impact of the Tong Valley.

The other (access road) solution will in theory allow access to the new developments without impacting traffic on the A650, other than at the Westgate Hill access point. However this assumes that all new residents will be travelling towards Leeds/Kirklees/the motorway network. Given that the new houses are intended to resolve Bradford's housing needs, and support job growth in Bradford this leaves quite a conflict. Any new residents who do actually need to access Bradford centre or the North, plus anyone who currently battles with the traffic into Bradford on the A650 Tong Street will be glad of a possible alternative; unfortunately the proposed access road ends abruptly at the easternmost edge of the current HolmeWood estate thus leaving all the additional traffic to find it's way either through the estate or via the unsuitable single track roads

2.1.6. It is absolutely vital that, if the Tong Valley Green Belt release was to go ahead, a satisfactory, long term access solution is agreed which suggests it can only be done once the link road has been definitely agreed or categorically cancelled. This in itself will push back the proposed timescales.

2.1.7. It would be absolute folly for Bradford to be successful in securing Green Belt release and commence building on the accessible fringes before a long term satisfactory road solution is agreed. For this reason it would be premature to release Green Belt at this stage.

2.1.8. The Rural single track farm roads which currently exist (New Lane, Raikes Lane, Holme Lane, Ned Lane) are woefully inadequate for current traffic volumes and the prospect of gridlock on the single track roads will be a regular occurrence with even a slight traffic increase in the area.

2.1.9. Bradford council have a bad track record in this respect when a golden opportunity to improve the eastern section of Holme Lane at the developers cost was missed when the Holme Beck development was built.

Conclusion

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, it follows that the Plan is not positively prepared.

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

No, I do not wish to participate at the oral examination

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:

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:

[Redacted Signature]

Date:

24th 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.

1. Do you live within or have an interest in the Bradford District?

I do not wish to participate in this monitoring exercise

X