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| 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 | 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 | 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 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.

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 that support this one.

Grounds of Representation

The Plan is Unsound in that it is Not Justified.

The Publication Draft is not justified in that it is clear that the proposal for the Urban Extension at Holme Wood, with the large scale green belt release envisaged, is not the most appropriate strategy for the District and that the Publication Draft contains insufficient evidence of consideration of the alternatives or for an 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.

The Green Belt should be given priority and there should be no loss of Green Belt unless there is no alternative. However there is no sign of this being a priority for Bradford Council. The inclusion of this Urban Extension in the NDP indicates a lack of commitment to Green Belt protection by the Council.

There is no evidence of Bradford Council having a Green Belt Policy with a clear strategy for redefining Green Belt and there has been no negotiation with neighbouring authorities on this.

As stated in a separate representation, the need for an Urban Extension appears to be driven by the NDP which requires that funding to regenerate HolmeWood be sourced from the new home contributions from the urban extension rather than a genuine need to provide a quantity of additional homes sufficiently strong to justify the release of particularly sensitive Green Belt in the Tong Valley.

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."*

To suggest that by bringing 2700 more houses into an area there would be infrastructure cost surpluses sufficient to regenerate the existing HolmeWood estate, which is of similar size to the Urban Extension, does not sound plausible.

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 well in excess of the total numbers proposed for the Holme Wood urban extension. Nonetheless the Publication Draft still allocates 6000 new homes to the South East Bradford area. 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.

In light of the reduction in overall housing requirement numbers it is Not Justified to claim that this is an exceptional case requiring the release of extremely sensitive Green Belt on which to build 2100 houses when the total housing stock requirement has, during the course of the process, reduced from 50,000 to 42087.

Furthermore the housing requirement of 42,087 contains a figure of 7687 which is stated to be the under supply of new homes up to 2013 from 2004. The Government requires that Housing Requirements should indeed include a figure for unmet need or under supply. However, that figure is arrived at by taking the 2004 estimate of annual requirement up to 2013 and diminishing it by actual completions. As such, an estimate, diminished by an actual figure remains an estimate. There is no evidence that the figure of 7687 has been sense checked 9 years down the line to establish that, as at 2013, that 7687 is a valid indicator of the current housing shortage, as other factors will have changed.

In summary

The overall Bradford housing requirement target can be achieved without the 1800/2100 destined for the Urban Extension therefore there is No Justification on the basis of housing numbers.

I agree with the opinion 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 long before any Green Belt is sacrificed. (see below)

There is No Justification for the urban extension on the basis of funding regeneration within the existing Holmewood estate.

Bradford Council have not taken Green Belt protection seriously and appear to be viewing the sensitive land of the Tong Valley as 'up for grabs' despite NPPD guidelines and that approach is clearly Not Justified.

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."

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.

As the above identifies an unsound document due to the Holmewood Urban extension being Not Justified, removal of references to the Urban Extension at Holme Wood, will resolve that aspect.

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:

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.

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:



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