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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 (where relevant)		
Organisation (where relevant)		
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	<b>Key Diagram –Location Strategy and Key page 66/7</b>  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.
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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 that support this one.

## 1. Grounds of Representation

### 1.1. The Plan is Unsound in that it is Not Effective because:

- 1.1.1. there is not sufficient evidence of effective cross-boundary working jointly with neighbouring authorities, particularly Leeds; and
- 1.1.2. that part of the Plan relating to the Urban Extension is not deliverable within the timescales envisaged in the Plan.

### 1.2. This relates to that part of the Core Strategy Development Plan Document Publication Draft which refers to an urban extension at Holme Wood which is a part of the Bradford MDC strategy to provide 42,087 new homes by 2030.

## 2. A separate representation "140324 Rep form 3" argues that Bradford MDC have failed in their duty to co-operate in preparing their Core Strategy, particularly with Leeds MDC the neighbouring authority which will suffer the greatest negative impact of the proposals for the Holmewood Urban Extension in particular and the other plans totalling 6000 new houses in the Bradford South East Area.

It follows therefore that without the high level of co-operation required particularly regarding the sensitivity of the Tong Valley Green Belt release proposal, traffic implications, etc, that the plan is unsound as it is not based on Effective Joint Working and Cross Boundary Strategic Priorities.

## 3. The Publication Draft is unclear about the delivery timetable of the Urban Extension.

### 3.1 Strategic Core Policy 5 (SC5) on page 49 suggests that land will be allocated in the following order:

- "1. First priority to the re-use of deliverable and developable previously developed land and buildings provided that it is not of high environmental value and the more efficient and effective use of existing developed areas within the City of Bradford, Principal Towns of Ilkley, Keighley and Bingley, the Local Growth Centres and the Local Service Centres.*
- 2. Second priority to other Greenfield opportunities within the settlements.*
- 3. Third priority to Local Green Belt releases to the built up areas of settlements in sustainable locations.*
- 4. Fourth priority to larger urban extensions in sustainable locations."*

### 3.2 However in the Housing Implementation and Delivery Strategy set out in the Publication Draft, Table 1 at page 358 shows that in years 4-8 of the plan 2018-23 "Work on growth areas beginning to show results i.e. Canal Rd and Holme Wood Urban Extension".

### 3.3 If Table 1 represents current intentions it clearly implies that release of land in SE Bradford for the Urban Extension would be given a higher priority than set out in Policy SC5, particularly as the Bradford Growth Assessment shows just under 2300 Previously Developed Land sites in SE Bradford, which should be used first under Policy SC5.

### 3.4 However for the reasons given below in relation to the lack of co-operation on highway infrastructure, it is impossible that the road infrastructure necessary to support the Urban Extension Wood could be in place

by year 4 of the plan, as the planning for it is in “conceptual” stage only at present, no cross-boundary consultations have taken place and no funding has been offered from any source.

3.5 The “CBMDC Local infrastructure Plan October 2013” (the “Infrastructure Plan”) states at paragraph 6.2 on page 121 that:

*“In light of uncertainties in major transport infrastructure funding, important decisions are required as to the approach on these development sites [the Urban Development]– 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.”*

3.6 It would not be effective to commence any work on the Urban Extension until all the necessary highways infrastructure is agreed with adjoining authorities, funded and materially in place to support the Urban Extension. The concept of ad hoc delivery associated with “small scale infrastructure” is ludicrous and wholly ineffective.

3.7 The earliest estimate which has been given by Bradford highways engineers for commencement of improvement works to the A 650 is 6 years. (As reported verbally to the Tong Neighbourhood Forum in September 2013. This work would only deal with the existing congestion problem).

3.8 The Infrastructure Plan (page 143) places the commencement of work on the Urban Extension access road at “Long Term” “10-15 years”.

3.9 Therefore the delivery of 2700 new homes in the Urban Extension is not achievable by 2030 and should therefore be struck out of the Plan.

- 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.**

References to the Holmewood Urban Extension should be removed from the plan.

**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 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