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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	Reverend Canon	
First Name	[REDACTED]	
Last Name	Dey	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	Bradford	
Line 3		
Line 4		
Post Code	BD9 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 28 th 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?

Section	3, 4 & 5	Paragraph	Key Diagram – Location Strategy and Key page 66/7, 4.1.3, 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	Policy	Sub-Area Policy BD1 C 1., Sub-Area Policy BD2 E and Policy HO2 B 2.
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4. Do you consider the Plan is:

4 (1). Legally compliant	Yes		No	No
4 (2). Sound	Yes		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.

I wish to challenge the legality of the Plan. I do so having been Vicar of Tong and Holme Wood from 1985 to 2011, and Chair of the Tong and Fulneck Valley Association – a position I still hold. My comments relate to that part of the Core Strategy that is proposing an Urban Extension to Holme Wood with consequent loss of a large swathe of countryside that currently enjoys Green Belt protection. In particular I would request that the Inspector carefully explores the following questions:

1. SUMMARY OF CONCERNS

- a) **HOLME WOOD CONSULTATION PROCESSES** – Have these been misrepresented in the process of developing the Core Strategy, and were decisions taken that pre-empted any proper evaluation of the Consultation at the Further Engagement draft stage that suggests that the Council was treating this as a 'cosmetic process' rather than one that should inform its planning?
- b) **THE TONG AND HOLME WOOD PARTNERSHIP BOARD 'MINORITY REPORT'** – Why did this need to be drafted, and why has Bradford Council never acknowledged this Report as a document that represented the views of all of the non political Community Representatives on the Board?
- c) **TONG AND HOLME WOOD NEIGHBOURHOOD DEVELOPMENT PLAN (NDP)** – Is this title 'fit for purpose'? Have the requirements of the Localism Bill been ignored in such a way that Bradford Council has no right to describe this document as a Neighbourhood Development Plan. Does the use of such a title suggest support from the local community in a way that is illegitimate?
- d) **NEIGHBOURHOOD DEVELOPMENT PLAN AND LDF FURTHER ENGAGEMENT DRAFT** – Why did Bradford Council rush all of this through and cause the NDP consultation process to be completed in advance of the LDF in a way that meant proper scrutiny and evaluation was seriously impaired?

2. HOLME WOOD CONSULTATION PROCESSES

Holme Wood is by far the largest social housing estate community in Bradford, with unusually high levels of social disadvantage. It is the kind of community where people often feel that they are powerless to influence or challenge public policy and decision making, and where people often feel manipulated.

Two main Consultation events took place over recent years in respect of Bradford's future housing development proposals, the second of which was also accompanied by three Bradford Council Neighbourhood Forum gatherings, in Tong Street, Holme Wood and Tong Village.

a) 1st HOLME WOOD CONSULTATION – 29th November 2008

At this point the Council was envisaging an extraordinary Urban Extension of up to 7,000 new homes! A fine attempt was made to consult local people in Nov. 2008 with simple questions and a presentation that elicited clear responses from local people – a method that was greatly assisted by support from 'Planning Aid' consultants, and local community development workers. The results were overwhelmingly opposed to the development of an Urban Extension, and the comments of local people showed considerable wisdom in their insight into the damage that this would do, both to Green Belt protected countryside, and to the social fabric of Holme Wood. I am appending a copy of the findings of this event as Appendix One.

b) 2nd HOLME WOOD CONSULTATION – 15th October 2011

The need for such an event was questioned at the time. It seemed to many local people that the Council was offering this because the questions that had been posed at the earlier event had not produced the responses that they were looking for! The event was much less 'user-friendly' than had been the case with the earlier event – a fact that was referred to at a later Bradford Council Scrutiny Committee. It was also not attended by the same proportion of Holme Wood residents – suggesting that many were dismissive of the Council's fresh attempts to 'seduce' them, or excluded by the methods that were being used. The Report on the event can be found at

[http://www.bradford.gov.uk/NR/rdonlyres/912452A2-D4E4-4A2C-8E04-](http://www.bradford.gov.uk/NR/rdonlyres/912452A2-D4E4-4A2C-8E04-8B29EC621877/0/HolmeWoodandTongNDPConsultationProgramme.pdf)

[8B29EC621877/0/HolmeWoodandTongNDPConsultationProgramme.pdf](http://www.bradford.gov.uk/NR/rdonlyres/912452A2-D4E4-4A2C-8E04-8B29EC621877/0/HolmeWoodandTongNDPConsultationProgramme.pdf) It appears to try and hide or minimise the fact that only nine people out of 141 from the BD4 area were in favour of large scale housing development. The nine people may of course include people who would personally gain from such developments.

In addition, all three Neighbourhood Forums that took place in September 2011 showed high levels of opposition to the Urban Extension proposals. Sadly this is not reflected at all in the Report, and the comments and conclusions of the Report could be seen as prejudiced towards large scale housing expansion.

Both the above Consultation events included 'heavy' attempts to persuade local people that if they were to agree to substantial housing development these would release high investment into Holme Wood. Clearly local people were not persuaded by this – though there is little sign of their views being reflected in the Core Strategy or its supportive documentation.

3. THE 'MINORITY REPORT'

I was a member of the Tong and Holme Wood Partnership Board from its inception until my retirement as Vicar of Tong and Holme Wood in July 2011. Initially the Board had been formed as a group that had no connection with the LDF. It had come together with a common concern to see major improvement take place **within** Holme Wood, and with a particular concern to see Holme Wood become a more socially mixed community. The LDF was later to re-constitute the group into the Partnership Board. I was deeply disappointed at the way in which the Board voted in favour of 'Option Two' at a meeting that followed the 2nd Consultation Exercise. It seemed to me that for the Board Chairman to use his casting vote in a circumstance that preferred the views of Council Officers and disregarded the views of all five of the local community members of the Board was utterly disgraceful.

Agreement to Option Two meant that that the Council technically had the Board's approval for its plan to establish a large scale Urban Extension to Holme Wood on what were described in the NDP as Sites 2 and 3 and required the loss of highly sensitive and strategically important Green Belt protected land – these are now represented in the Core Strategy as SE099 and SE100 in the SHLAA.

Community Members on the Board met shortly afterwards and were so frustrated by the above decision that they decided to produce and sign their own 'Minority Report' of the Board. This was duly completed and signed by all five members, and a copy was given to the Board's Chairperson. I am attaching this as Appendix B. The Report confirmed the common ground that we wanted to maintain with other Board

members – but opposed the plan for the Urban Extension with its heavy projected Green Belt release. The Report was never discussed or debated in any subsequent Board or Council meeting. The Council has frequently justified the inclusion of the Holme Wood Urban Extension in the Core Strategy by pointing to its inclusion in the Neighbourhood Development Plan.

In February 2011 I wrote to Bradford Planning Officer Andrew Marshall to request that the Minority Report be included in the Further Engagement Draft Consultation process that was ongoing at the time. I am including a copy of my letter to him as Appendix C. I do not see any sign of the Minority Report being reflected in the 'Statement of Pre-Consultation' the Further Engagement Draft.

The weight of such concern was further increased by the presentation of a petition of 1006 people opposed to the Urban Extension – the majority of whom lived in Holme Wood and Tong Street. This is by far the largest petition relevant to the Core Strategy that Bradford Council has received - particularly striking when it is recognised as emanating from a community that often feels disregarded in such matters.

4. THE NEIGHBOURHOOD DEVELOPMENT PLAN (NDP).

I am not well versed in the Localism Bill of 2011, but I gather that it prescribes a methodology for the formulation of NDP's that ensures that they are locally 'grown' and 'owned'. The only methods that were used to claim ongoing 'ownership' of the local community in Tong and Holme Wood was the involvement of the Tong and Holme Wood Partnership Board, and the NDP Consultation Process. With regard to the former – the process that led to the production of the Minority Report above amply demonstrates the cynical way in which local people were ignored in the decision making process. In addition at no point were the requirements of the Localism Bill presented to the Partnership Board, though the NDP title was maintained. Regarding the latter, the submissions by local people and organisations, and the substantial petition that carries my name as the lead petitioner is self evident. I would suggest that the use of the title NDP is misleading and illegitimate.

5. NEIGHBOURHOOD DEVELOPMENT PLAN AND LDF FURTHER ENGAGEMENT DRAFT

The Consultation Process that accompanied the publication of both the NDP and the LDF Further Engagement Draft, and the point at which Bradford Council Executive made its decision to approve the inclusion of 'Option Two' requires careful scrutiny. Indeed the Council's own Scrutiny Committee that took place after this process was critical of it. I would refer the Inspector to the submission by the Tong and Fulneck Valley Association for more detail regarding this.

6. SUMMARY

All of the above suggests that Bradford Council has conspired to produce a plan for a huge Urban Extension that would require heavy loss of Green Belt protected countryside, but has consistently failed to initiate and respond to Consultation in a way that is genuine, and it has misrepresented such Consultation in a way that is reprehensible. The Inspector may well feel that there are too many features attached to

the Core Strategy's methodology that appear to be either manipulative or lacking integrity of method for the Core Strategy to be legally acceptable.

APPENDIX A

LOCAL DEVELOPMENT FRAMEWORK FOR BRADFORD

CORE STRATEGY – FURTHER ISSUES AND OPTIONS HOLMEWOOD CONSULTATION

CONTEXT

New planning legislation which came into force in 2004 requires Local Authorities to replace their current development plans, in Bradford's case the Replacement Unitary Development Plan (RUDP), with Local Development Frameworks.

The Local Development Framework (LDF) will be made up of a collection of statutory and non-statutory documents which focus on either topics (e.g. housing) or a geographic area (e.g. Bradford City Centre).

The Core Strategy is a statutory document which will become the new development plan for the district once adopted. It will set out a spatial vision for the district along with broad aims and objectives to achieve the vision. It will contain broad policies for steering and shaping development and will set out the broad location for housing and employment growth and infrastructure investment until 2026.

There are key three stages in the preparation of any Core Strategy:

- **Issues and Options** – identification of the issues for the district and options to address these.
- **Preferred Options** – sets out the Council's preferred option(s) for the development of the district until 2026.
- **Submission Document** – Once the Council is satisfied with approach of the Core Strategy and once it is confident a sound document has been produced, it submits the document for adoption by the Government.

To address the Government's increase in housing targets, the Council decided to re-consult the public at the *Issues and Options* stage – this has been named the *Further Issues and Options* stage. This consultation identifies four spatial options for the location of housing and employment development until 2026. Holmewood and Esholt were identified as growth points in Options 3 and 4.

CONSULTATION

- A public consultation event to outline and discuss a proposal to extend Holmewood took place at the TDF Centre in Holmewood on Saturday 29th November 2008 between 9am to 3pm.
- The event was jointly run by Planning Aid, Streets Ahead the Council's LDF Team.
- The event was advertised at Area Forums and a flyer was distributed locally by Streets Ahead to advertise the event. In addition, there was media interest surrounding the housing growth issue during the run up to the event.
- Different methods were used to explain and draw out comments from the public:
 - **Presentation display panels** to explain context of the proposal;
 - **Large table top aerial photograph** to stimulate discussion, teeth out issues and place comments on;
 - **A series of questions mounted on wall** for people to use sticky dots to express their opinions
- A total of 175 people attended the event.

OUTCOMES AND FEEDBACK FROM CONSULTATION – PLANNING AID

Planning Aid produced a summary report of the outcome of the questions which were mounted on the wall.

Below is a summary of the main points to the questions "If Holmewood was to be made bigger..."

- Majority of people (77) felt 500 or less homes was acceptable; 15 people thought 1000 homes were acceptable.
- 8 people thought over 5000 homes were acceptable.
- Larger housing was favoured, as well as housing for elderly and disabled.
- Mixed views on tenure of housing.
- Strong support for modern 'eco' homes which fit into the environment.
- Majority of residents would not want to live in new homes.
- Residents favoured a range of community facilities, a police station and health centre scored highly.
- Residents had mixed views regarding what kinds of shops and eating facilities they would like to see in Holmewood; fresh food shops, supermarket and shopping centre were favoured highly.
- A variety of recreational areas would be favoured, ranging from a county park, swimming pool to urban farms.
- In terms of transport:
 - Better and more affordable bus services
 - Improvement to Tong Street
 - Bus link to new train station (at Laisterdyke)
 - New train station
 - New major link road (3 people objected to this)
- Empty homes and waste land to be considered before an extension.
- People commented that new communities facilities at the heart of the 'new' Holmewood and complimentary design of new houses would allow the two area to merge together.
- Overall, 17 people 'for' the extension, 100 'against' and 6 were not bothered.
- The main reasons (in order of priority) why people disliked the proposal was:
 - Loss of green belt/countryside
 - Should improve existing estate before build new one
 - Holme Wood would be too big
 - Don't believe we'd get the promised benefits
 - More traffic problems
 - Overcrowded health, school and other facilities
 - Leeds not Bradford will benefit
 - Loss of community spirit on estate

OUTCOMES AND FEEDBACK – COMMENTS ON AREIAL PHOTOGRAPH

Below is a summary of the comments placed on the aerial photograph.

- A masterplan is needed first
- Protect our woods and Greenbelt (Black Carr Woods)
- Bats in Black Carr Woods
- Questioning homes of animals.
- Area was a mining area (Charles Pit and Scholebrook)
- Springfield Gardens is a horticulture project for adults with learning disabilities
- New houses could be built on old Tong School Site
- Need new house (Land to north of Westgate Hill Street, opposite employment site)
- Setting of Tong Village will be compromised.

EVENT FEEDBACK

Generally the event was a success, with 67 people stating that the event was 'Good'. 8 people thought the event was 'OK' and 2 people thought it was bad.

Below is a summary of the comments regarding the consultation event itself:

- Good event.
- Information was well presented
- Using the sticky dots to illustrate response was brilliant.
- Appreciated being able to speak to planners and councillors.
- Planners more open than at other consultation meetings.
- Event was biased (in favour) of extension.
- Relevant information was not made available.

- The event presented as if this is a foregone conclusion.
- Vague on how this proposal benefits Bradford as a whole.

WRITTEN REPRESENTATIONS

In total, the Council received 23 written representations. None were in support of the proposal.

Below are the main points from the written representations:

- Settlement Study flawed as no reference to Holmewood
- No reference to Landscape Character SPD
- Proposal for extension of Holmewood should not go ahead
- Crime and anti-social behaviour already a problem, additional houses may increase problem
- Community spirit would be lost
- Improvements needed to A650 Tong Street and Westgate Hill Street
- There will be adverse effects upon the amenity and recreational value of the green belt
- Green Belt should be protected
- Develop brownfield land first
- Concerns regarding infrastructure (roads, schools, health facilities) to support development
- Extension would do little to enhance the economic development and prosperity of Bradford
- Housing should be concentrated in the Aire valley
- Development away from the Aire Valley with a concentration on South Bradford would have an impact on the economy
- Rail station at Laisterdyke would be of no benefit to residents of Holmewood

NEXT STAGE

The LDF Team are currently taking stock of all the comments received during the Further Issues and Options stage of the Core Strategy and are in the process of preparing the Preferred Options Report.

The Preferred Options Report will set out the Council's preferred approach for the location of housing and employment growth until 2026. This will be informed by a robust and sound evidence base.

It is anticipated that this report will be available for public consultation in June/July 2009 following approval from the Executive Committee in April 2009.

Emma Crossland Stephen
13.01.2009

APPENDIX 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.

13th February 2012

Dear Andrew

LDF CONSULTATION

Holme Wood and Tong Partnership Board – Minority Report

I am writing to you on behalf of five members of the Holme Wood and Tong Partnership Board to request that a 'Minority Report' signed by these members be included in the current LDF Core Strategy Consultation. I am enclosing a copy of this Report. All five members are community representatives. Two were elected to serve on the Board by the Holme Wood Community Council (David Wilford and Gordon Dey) ; the other three were selected to represent the local communities of Holme Wood and Tong after a careful interview process (Michelle Morgan, Virginie Lusandu and John Finnigan). The only other community representatives on the Board are the local elected Councillors.

The Report was written following a decision of the Board to include the controversial Option Two proposals in the Neighbourhood Development Plan. If agreed such proposals would result in substantial greenbelt release to enable a so-called Urban Extension to Holme Wood to be realised. Our Report challenges the wisdom of this, and highlights the way in which such inclusion has come about by methods that have not been consistent with good practice.

The Report is relevant to the LDF consultation, as we note that the current LDF Core Strategy proposals anticipate the inclusion of this 'Urban Extension' as a significant part of Bradford Council's proposed future housing provision for this area. We would therefore ask that the views and comments it contains are taken into account when the LDF plans are formulated and scrutinised, and when decisions are made regarding the Council's Core Strategy proposals. We would also ask that this document is available for perusal in any inspection process that is required to take place.

Yours sincerely

█ Dey

and on behalf of █ Finnigan, █ Lusandu, █ Morgan, and █ Wilford.

- 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.

If the Inspector finds that the questions I have posed persuades him that the plan has not been legally formulated the Council will need to begin again on a much more satisfactory foundation.

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?

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
<input checked="" type="checkbox"/>	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:

So that further detail of my submission can be given, and detail can be clarified.

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:

28th March 2014