

EXAMINATION OF THE

BRADFORD LOCAL PLAN CORE STRATEGY

SCHEDULE OF MATTERS, ISSUES & QUESTIONS FOR EXAMINATION

Day 2 (afternoon) Matter 3 Strategic Core Policies (Cont) SC4 – Settlement Hierarchy

Day 3 (morning) Matter 3 Strategic Core Policies Location of Development (Cont) SC5

SC5 –Location of Development

Statement by the Tong and Fulneck Valley Association

These are not sessions at which we are listed to attend.

Our detailed representations in respect of the matters listed at these sessions are set out in four forms of submission sent electronically on 25 March 2014 (and submitted also in hard copy) to ldf.consultation@bradford.gov.uk identified as *“Comment Form 3 Final not positively prepared soundness”* (“Form 3”), *“Comment Form 4 Final not justified soundness”* (“Form 4”), *“Comment Form 5 Final not effective soundness”* (“Form 5”) and *“Comment Form 6 Final not in accordance with national policy”* (“Form 6”)

We do not wish to modify our grounds of objection in the light of documents subsequently posted by Bradford MDC (“BMDC”), but to clarify how these representations relate to the questions posed by the Inspector at the relevant sessions, and to respond to **SD/017** the Core Strategy Publication Draft (2014) Background Paper 2: Housing (Part 1 and to the extent we have been able to analyse them the responses in Summary of Comments Received and Council Response to the Publication Draft Consultation. Our original representations should be read as submitted.

Questions 3.2 and 3.3

Whilst our concern relates primarily to the Holme Wood Urban Extension (the “Urban Extension”), to be discussed under Matter 6A Question 6.3, we wish to record our general observation that the balance of the Settlement Hierarchy and Location described in SC4 and SC5 places too great a proportion of new houses in SE Bradford at the very border with Kirklees and Leeds. Despite

BMDC's assertion in response to representations in the Statement of Pre-submission Consultation (2014) (Appendix 7J page 89) that: *"The target for SE Bradford "does not simply reflect the availability of a large tract of open land adjoining Holme Wood. It reflects the argument and evidence that this would be a sustainable location for growth"*, we continue to reject that argument and question the strength of the evidence produced, which is mainly based on the Growth Assessment by Broadway Maylan dated November 2013 (the "Growth Assessment") which recommends the inclusion of housing numbers for SE Bradford well above the baseline population distribution (14.3% vs 11.6%).

We argue that this is not a sustainable location for such growth because of lack of credible evidence within the Plan or the supporting documents that there will be available and fundable infrastructure and because BDMC has not demonstrated how employment opportunities will be developed, and because the evidence is that the existing Holme Wood estate is currently unsustainable and will be disadvantaged by, rather than benefit from, new growth, other than moderate infill and moderate development immediately adjacent to its boundaries. The growth that we support would be infill and development on the northerly side within the natural curtilage of Holme Wood. Such growth, if wisely undertaken, can provide an appropriate level of new housing and help to create a more sustainable community in Holme Wood.

The location of the Urban Extension makes no geographical or economic sense if as at paragraphs 3.85/6 of the Plan the intention is for *"a more transport orientated approach to development"* and for public transport to *"radiate from within settlements to link into main centres of activity"*. It is not totally clear what BDMC means here in application to the Urban Extension, but what does seem to be clear from the highways plans, such as they are, is that the natural pathway out from the Urban Extension is towards the A650 at Westgate Hill and away from Bradford City centre, if that might be thought to be the main centre of activity. If that is the case, then this points to a car centric development with links outside Bradford which does not meet the stated intention at 3.85/6.

Equally it is trite for BMDC to say at SC5 A 4 that *"larger urban extensions in sustainable locations"* are a fourth priority for development location, when the Plan sets out only the one Urban Extension and, as seems clear from paragraph 4.49 of [SD/017](#) and the Growth Assessment and the CMDC Local Infrastructure Plan 2013 that BDMC is already planning an early start on the Urban Extension.