Tong and Fulneck Valley Association-

John Finnigan

Comments on "Homework"

DAY NINE Wed 18th March 20156 10.00 am

Matter 7B

Policy HO4 Phasing & Release of Housing Sites

Comments on "Further Statement Clarifying Phasing Policy and 5 Year Land Supply Figures/Calculations

PS/FO61-CBMDC-Clarification of phasing and 5 year land supply figures

- 1. Strategic Core Policy 5 (SC5) A 4 puts the development of larger urban extensions in sustainable locations as a fourth priority. We supported that prioritisation because our view was and is that large tracts of green belt land should only be considered for release when all alternatives have been examined and exhausted. The Council confirmed to the Inspector during the hearing that the Core Strategy envisages only one urban extension (which they defined as more than 1000 houses in green belt land), namely that at Holme Wood.
- 2. The reason why we supported urban extension as a fourth priority (without prejudice to our overall objection to a development of more than 900 houses at Holme Wood) is that such extensions require major infrastructural support, careful planning and the active support of the community into which they are to be introduced, if they are to be successful.
- 3. In the Hearing we cited the existing Holme Wood Estate as an example of a large scale and complex development, first commenced over fifty years ago, which has brought with it a legacy of social disruption, because it was undertaken too quickly, on too large a scale and without adequate infrastructure. We pointed out that the local infrastructure at Holme Wood is still inadequate for the existing estate, and would require very substantial augmentation if any further development were to be sustainable.
- 4. We did not oppose the Council's phasing proposals at Policy HO4 as we are of the view that such phasing is a means of removing the temptation to the developers of early "easy pickings" in the form of large tracts of green belt land, which having regard to the obvious and understandable profit motive they would choose in preference to more challenging brownfield and smaller greenfield sites. This would ensure that sensitive and strategic green belt land would be used only as a final and unavoidable necessity.
- 5. However we were concerned to hear evidence given at the hearing (and set out in PS/DO18i Statement by Johnson Brooks) that the Council had held a meeting on 17 February 2015 with developers and agreed the principle of advance housing development at Holme Wood "and the total number of dwellings which can delivered in this first phase will be subject to transport

- assessment and the timing of development starts will be subject to the required application process and an agreed allocation and Green Belt boundary amendment."
- 6. Such an agreement seemed to us to be in contravention of the prioritisation set out in SC5 and, as it happens, contrary to verbal assurances given by planning officers to the community in the consultation meetings that, even if the larger numbers of housing envisaged by the urban extension proved necessary, they would only come "a long way down the line" and "when all the brownfield possibilities have been exhausted".
- 7. Accordingly we are disturbed to see the proposed insertion into Policy HO4 of the new paragraph D providing that:-
 - "Consideration will be given to the need to bringing forward large and complex sites within the first phase where this would aid delivery or help to secure required investment and infrastructure;".
- 8. We assume that this insertion is intended to include the Holme Wood Urban Extension and to give validation to the exercise that the Council had already apparently undertaken with Johnson Brooks clients.
- 9. We repeat our submissions that the full Urban Extension at Holme Wood as proposed (or even the development of up to 900 houses there which we have supported) would demand substantial infrastructure and substantial and sustained management and financial support from very many agencies over a sustained period.
- 10. There has been no evidence given as to consultation with or financial commitment from many of these agencies, other than a financial commitment from the West Yorkshire Transport Plus Fund for some improvements to Tong Street (but not for land purchase where the Council is not already land owner) and a less specific support for an as yet unidentified and costed South Bradford Access Route. Indeed the Council in evidence said that a number of agencies and authorities would not consider giving commitments until the Urban Extension had been given approval.
- 11. Our view is that bringing forward parts of the urban extension development into Phase 1 until the whole of the infrastructural requirements have been identified and committed would merely result in even more unsustainable development in Holme Wood to the considerable detriment of the local community and would not be a strategic step, but rather a tactical move to "bounce" infrastructural agencies, adjoining authorities and the communities into accepting as a *fait accompli* an overall excessive and unsustainable development.
- 12. These comments are given subject to our overall position that we oppose the inclusion of the Urban Extension at Holme Wood within the Core Strategy.