

## Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**  
(Additional Part B forms can be downloaded from the web page)

### 4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

No relevant Main Modification covers the issue

### 5. Do support or object the proposed main modification?

Support

n/a

Object

### 6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

n/a

No

### 7. Do you consider the proposed main modification to be 'sound'?

Yes

n/a

No – 'unsound'

unsound

### 8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Effective

Consistent with National Planning Policy (the NPPF)

### 9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to a proposed main modification).

- The Council has not addressed in the Main Modifications the issues of increased threats of flooding. In our representations on the Publication Draft we noted that we did not believe that there had been adequate (or indeed any) consultation with the Environment Agency and Yorkshire Water over the effects of the large scale housing development proposed at Holme Wood on the water table and surface water run off within the Tong Fulneck Valley and within Cockersdale, into one or the other of which valleys the land shown in the Tong and Holme Wood Neighbourhood Development Plan as being likely development sites drains.
- We expressed our concerns about the possibility of downstream flash flooding as both valleys drain into the Farnley Beck, which itself runs into the River Aire potentially



affecting many houses and businesses in Leeds, as well as the landscape structure of the two valleys.

3. The recent Boxing Day floods confirmed our fears that these watercourses are vulnerable, as the Pudsey Beck running through the Tong Valley broke its banks and caused extensive flooding and disruption to the apartments at Roker Lane and the recently developed Troydale housing.
4. Our concern is that Bradford has made the urban extension at Holme Wood a key plank in its housing strategy with giving any consideration to the now demonstrated effects of global warming on precipitation and the consequent effects of large scale housing and industrial development on previously virgin land.
5. We believe that the Local Plan should include by way of a Main Modification a confirmation that studies will be undertaken on the flooding effects of every housing development proposal and the extent of defensive or preventative civil engineering work that would be required within the landscape surrounding such proposal, particularly where such engineering would be required with Green Belt land.

**10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.**

**You need to say why this change will make the proposed main modification 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.**

Introduce new Main Modification confirming that studies will be undertaken on the flooding effects of every housing development proposal and the extent of defensive or preventative civil engineering work that would be required within the landscape surrounding such proposal, particularly where such engineering would be required with Green Belt land and could have an adverse effect upon the landscape.

**11. Signature:**

**Finnigan**  
For and on behalf of  
the Tong and Fulneck  
Valley Association

**Date:** 17 January 2016

**Thank you for taking the time to complete this Representation Form.**