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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	FINNIGAN	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	[REDACTED]	
Address Line 1	[REDACTED]	
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Line 4	[REDACTED]	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	Authorised by resolution of the Trustees of the Tong and Fulneck Valley Association dated 20 March 2014	Date: 24 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	<p>Key Diagram –Location Strategy and Key page 66/7</p> <p>Figure BD1: Spatial Vision Diagram</p> <p>4.1.3</p> <hr/> <p>5.3.22 5.3.34 5.3.35 5.3.37 5.3.42 5.3.61</p> <hr/> <p>Appendix 6 Table 1 page 358</p> <p>Appendix 6 Paragraph 1.9 Page 363</p>	Policies	<p>Sub-Area Policy BD1 C 1.</p> <p>Sub-Area Policy BD1 E 1.</p> <p>Sub-Area Policy BD2 E</p> <p>Policy HO2 B 2.</p> <p>Policy EN4 A</p>
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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.

Grounds of Representation

We contend that the Plan is unsound in that it is not in accordance with national policy.

Particulars of Representation and supporting evidence

1. Our representation specifically relates to that part of the Core Strategy Development Plan Document Publication Draft (the "Publication Draft") which refers to an urban extension at Holme Wood (the "Urban Extension"). The Urban Extension is a key part of the Bradford MDC (the "Council" or "Bradford") strategy to provide 42,087 new homes by 2030.
2. The Urban Extension is referred to on the plan at Page 67, at Policy BD1 C.1 (page 73), Paragraph 4.1.3 (outcomes by 2030) (Page 64), Sub-area Policy BD2 E (Page 79) Paragraph 5.3.22 (page 158), Paragraph 5.3.34 (Page 161) Paragraph 5.3.35 (Page 162) Paragraph 5.3.37 (Page 162) Policy HO2 B 2 at Paragraph 5.3.37 (Page 163), Paragraph 5.3.42 (Page 164), Paragraph 5.3.61 (Page 169), Table 1 to Appendix 6 (Page 358) and Appendix 6 paragraph 1.9 (Page 363).
3. The Urban Extension was first proposed publicly in implied terms at the Further Issues and Options stage of the preparation of the Plan in November/December 2008, and in specific terms in the consultations which took place on the proposed Holme Wood and Tong Neighbourhood Development Plan (the "NDP") referred to in paragraph 1.9 of Appendix 6 to the Publication Draft. In the form adopted by the Council on 20 January 2012 this provides for the construction of 2700 new homes in and around the existing Holme Wood estate of which 2100 new homes are scheduled to be built in the Green Belt in the Tong Valley on sites identified as Site 1, Site 2 and Site 3 on the plan (the "NDP Plan") at page 13 of the NDP Delivery Plan.
4. These sites appear (with slight variation) as SHLAA sites on the Strategic Housing Land Availability Assessment Update Report May 2013 Bradford South East Settlement Area Map (the "SHLAA Map").
 - 4.1. Site 1 on the NDP Plan includes sites SE/060, SE/055 and SE/046 on the SHLAA Map";
 - 4.2. Site 2 on the NDP Plan includes Site SE/100, SE/061 and a part of Site SE/099 on the SHLAA Map; and
 - 4.3. Site 3 on the NDP Plan comprises part of SE/099 and the whole of SE/057 on the SHLAA Map.
5. The SHLAA Map also identifies within the Green Belt, Sites SE/065 in the central part of the Tong Valley and SE/056 at the south of the area, on Westgate Hill Street, as being "potentially suitable" sites and Site SE/101 as being "not within the trajectory". These Sites are not included in the NDP Plan.
6. Additionally the SHLAA Site and Strategic Parcel Map (the "Growth Assessment Map") on Page 10 of the Bradford Growth Assessment with Site Assessment prepared for the Council by Broadway Maylan and dated November 2013 (the "Growth Assessment") shows two additional sites not included in the NDP Plan, namely SE/SP 001 and SE/SP 002, being all the remainder of the Tong Valley within a 500 metre buffer of the edge of Holme Wood not included in Sites 1,2 or 3 on the NDP Plan. This is described as "Strategic Parcel land".
7. In order to achieve the Urban Extension a substantial release of Green Belt land will be required, as is acknowledged in the Publication Draft. Whilst we accept that actual sites will need to be identified at the Land Allocation stage there is sufficient clarity as to the Council's intentions from the NDP Plan and the Growth Assessment Map as to the general location and size of the Urban Extension.
8. We do not believe that the proposed Green Belt release at Holme Wood is consistent with the Guidelines set out in the National Planning Policy Framework ("NPPF").
9. The relevant statements within the Publication Draft relating to Green Belt release are at Strategic Core Policy 7(SC7) B. on page 47 which states:-

"B. Green belt releases will be needed to deliver longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3 and will be delivered by a selective review of Green Belt boundaries in locations that would not undermine the strategic function of green belt within LCR and that would accord with the Core policies and the strategic patterns of development set out in Policy SC5. The Decisions on allocations on green belt land will be assessed against the purposes of including land in green belt as set out in national guidance."

And at paragraph 3.103 at page 58 which states:-

"The Local Plan will establish a green belt which is capable of lasting beyond the plan period given the contribution of windfall within the plan period will allow the allocated supply of sites to last longer and establish a green belt boundary to at least 2030." (sic).

10. We are not satisfied that these statements meet the requirements of paragraph 83 of the National Planning Policy Framework ("NPPF") which states that: *"Local planning authorities should establish Green Belt Boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt Boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries, having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period"*. We believe that this Plan should clearly set the Green Belt boundaries, or assert that the existing boundaries are to apply. It is clear that national policy recognises that the alteration of the Green Belt boundaries should be undertaken during the preparation of the Local Plan. This should not be left to some indeterminate ad hoc process at some uncertain future time.
11. In proposing a major Urban Extension within the Tong Valley, without specifying the actual effect on Green Belt boundaries at that point, Bradford is not, as required by paragraph 83, either establishing a boundary or altering a boundary.
12. Bradford may however say that, by proposing the Urban Extension, it is by implication suggesting an alteration to an established Green Belt boundary. In that case we would respond that such alteration is not one to which *"exceptional circumstances"* apply.
13. Bradford says that it must build on this part of the Green Belt, because that is where there is most land, and it does not have a sufficient supply of land elsewhere to achieve its targets. For reasons given in other representations lodged by us, we contend that there are alternative locations for the 1800 houses which would be located on sites SE/100 and SE/099 on the SHLAA Map. Therefore a claim of *"necessity"* is not valid.
14. Bradford also argues that development at these sites would assist in leveraging funding for the regeneration of Holme Wood. We do not agree that this would necessarily be the case (as we have explained in other representations lodged by us). However even if it is correct that development on these sites would leverage funding, that would not constitute exceptional circumstances within the terms of the NPPF. Bradford has alternative means of funding regeneration in Holme Wood. It sets these out in Policy ID8 A (we cannot find section B, but if there is one there may be even more methods) on page 308 of the Publication Draft. What is clear is that it is not entitled to claim impecuniosity as an *"exceptional circumstance"* justifying the sacrifice of Green Belt land.
15. Paragraph 88 of the NPPF (which we accept relates to planning applications rather than the establishment of a Local Plan) makes it clear that *"very special circumstances"* only apply when the potential harm to the

Green Belt is “clearly outweighed by other considerations”. That is a very high standard and one which we think should be considered in this case. Bradford has at all stages in the preparation of the Plan since 2008 put the Urban Extension at the head of its priorities without giving a value or weight to the function of and potential harm to the Green Belt at this point. Even if the relative weightings are equal, the national policy standard will not be met. The other considerations must clearly outweigh the harm to the Green Belt. We set out in the representation a number of weighty factors in favour of the retention of the Green Belt at Tong Valley.

16. Paragraphs 79 and 80 of the NPPF state:-

“79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes:

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

We are of the view that “Strategic Policy 7 (SC7): Green Belt” on page 57 would be strengthened if these five purposes were expressly set out. We note that one of the grounds of objection of Leeds MDC to the Further Engagement Draft was the failure of Policy SC7 to give due regard to national planning guidance in preventing neighbouring settlements from merging. Whilst it is encouraging that Bradford has now changed SC7 to acknowledge national guidance, if it were to set out clearly the five purposes within the body of the Plan, this would highlight the extent to which the Urban Extension falls without those purposes.

17. The Growth Assessment considers that the Green Belt in SE Bradford:-

“[P]rovides a significant contribution to the West Yorkshire Green Belt.”.....

It goes on to say:-

“The Green Belt significantly contributes towards preventing Bradford from merging with Leeds and more locally Bradford with Cleckheaton, Birkenshaw and Pudsey”.....

“Topography variations in this quadrant also mean that there are areas where development could be accommodated without having an impact on the openness of the Green Belt.”“Potential locations include the land between the south east of Bierley between Holme Wood and Lower Woodlands and between Holme Wood and Tyersal.”....

“The Green Belt in SE Bradford is not contributing towards preserving the setting and special character of a historic town. There are however, locations within the quadrant which contribute to preserving the setting of the Conservation Areas and Historical Assets”...”

These are very positive statements recognising the effectiveness and value of the Green Belt in this sector,

which are at odds with the overwhelmingly negative effects of massive Green Belt release in the Tong Valley.

18. Significantly the Growth Assessment does not comment on the effect of the location of proposed Green Belt releases in the Holme Wood and Tong Neighbourhood Development Plan save that these *"were supported through public consultation"*. (We have challenged, in a separate representation, the assertion that the NDP was "supported" through public consultation, as all the evidence from the Statements of Pre-Submission Consultation September 2011 (Issues and options Stage) and 2013 (Further Engagement Draft) show that the proposed Green Belt releases at Holme Wood were overwhelmingly opposed by the wider public consultation, as does the NDP Consultation Programme January 2012.)
19. The Sustainability Appraisal of the Bradford Core Strategy Publication Draft February 2014 by AMEC (the "Sustainability Appraisal") says at page 36 *"Development inHolme Wood... is likely to result in the loss of green belt land, which contributes positively to landscape character and plays an important role in preventing urban sprawl and maintaining countryside character and openness. However it is recognised that green belt releases are inevitable in order to meet housing need. Development of greenfield land along the urban fringe could also impact upon visual amenity and sense of space."*
20. We agree with this analysis save that the resigned recognition of the inevitability of Green Belt releases fails to address the question of scale and location of the releases. Particularly it does not seek to justify why the most sensitive section of the Green Belt at the Tong Valley was selected by the Council for the largest release and the one most likely to destroy countryside character and the sense of openness in a part of Bradford which has such a high proportion of its population with such a low level of easy access to open countryside otherwise than within The Tong Valley.

Urban Sprawl and Coalescence

21. It is our contention that the Urban Extension would significantly diminish the value of the Green Belt in SE Bradford at this point in preventing urban sprawl and coalescence between Bradford and Leeds both to the north at Pudsey / Fulneck and to the south and south east at Drighlington and between Bradford and Kirklees at Birkenshaw to the west.
22. This is clearly illustrated by the Growth Assessment Map, which shows SHLAA sites and strategic parcel land extending the full extent of the Settlements Buffer around Holme Wood. The most southerly SHLAA site shown on the Growth Assessment Map within that buffer (SE99) joins up with the settlement at Westgate Hill which itself joins the Kirklees settlement at Birkenshaw. The SCHLAA Map shows two additional sites (SE 057) and (SE056) even nearer to Drighlington which if developed would continue ribbon development along the B6315 Westgate Hill Street towards Drighlington.
23. Holme Wood has already grown significantly into the Green Belt with the development of the private estate at Mossdale and the infill of the Holme Beck Park estate up to Holme Lane. A significant Green Belt release was authorised by the Secretary of State for the construction of Tong School at Westgate Hill Street, which now sits awkwardly on the skyline when viewed up the Tong Valley. There has been a trend towards extension and it is clear that Bradford wishes to continue that trend.
24. Against this, it is significant that Leeds MDC has vigorously defended the Green Belt at this boundary with Bradford.
25. We agree with the Growth Assessment (at page 11) that there is some room for sensitive Green Belt release and housing growth between Holme Wood and Tyersal. This would be consistent with a more modest local

Green Belt release rather than the Urban Extension.

26. A more modest extension is what was sought by the community representatives on the Tong Partnership Board (an extract from whose minority report is quoted in Part A of the Schedule to this representation and a full copy of which is set out in the schedule to our first legal representation) at the time of the consultation on the NDP. That would also meet with the terms requested in the petition to Bradford Council of 1008 signatures which accepted the construction of up to 900 new homes on infill sites within Holme Wood and on small Green Belt releases at the edge of Holme Wood. The petition is referred to at page 18 of the Statement of Pre-submission Consultation Core Strategy DPD: Further Engagement Draft (2013) and its text is set out in Part B of the Schedule to this representation.
27. The threat of neighbouring towns merging into each other was recognised by Leeds City Council at the time of the consultation on the NDP and the Further Engagement Draft in respect of proposals for the Urban Extension, which were identical to those contained in the Publication Draft.
28. In fact Leeds City Council, as a planning authority, was so concerned about the effect of the Urban Extension on the continued effectiveness of the Green Belt, and on traffic infrastructure, that it lodged formal objections to the Further Engagement Draft. Leeds objected to Policy HO2 in identifying Holme Wood as an urban extension and Menston for growth of 900 dwellings. Leeds said:-
"The significant scale of development proposed at Holme Wood and Menston will require significant encroachment into the Green Belt gap between Bradford and Leeds which would be contrary to the role of Green Belt. Also, traffic congestion and hazards would be created to roads in Leeds, particularly the A657 and routes to Drighlington and beyond, and the A65."
Leeds also objected to Policy SC7 on the grounds that, as a Green Belt policy, it failed to give due regard to national planning guidance in preventing neighbouring settlements from merging.
29. The Leeds objection was entirely valid at the time it was made, and except for changes in the political composition of Leeds MD Council, and the resolution of the Leaders' Board of the Leeds City region Partnership Board of 12th December 2012 referred to at paragraph 2.27 of our representation on Duty to Cooperate, the situation has not in any way changed since that time.
30. Bradford's only answer to the Leeds objection is on page 135 of the Core Strategy DPD: Further Engagement Draft Statement of Pre-Submission Consultation (2013) where it says *"The proposed urban extension would in no way result in the coalescence of the two cities of Leeds and Bradford."* This statement is not supported by argument and, in our view, is simply wrong. We also are concerned that Bradford views coalescence in terms of the merger of the two cities of Leeds and Bradford, whereas national policy is specifically concerned with the merger of neighbouring towns. Therefore consideration of the value of the Green Belt at this point should also take into account the proximity of Pudsey, Birkenshaw and Drighlington to the Urban Extension.
31. In the same response Bradford incorrectly claims that the Growth Assessment *"indicates that the proposed urban extension can be accommodated without undermining the role and functioning of the green belt between Bradford and Leeds."* As we point out at paragraph 17 above the Growth Assessment indicates only that development between Bradford and Tyersal can be accommodated without adverse effect on the Green Belt, an opinion with which we agree.
32. One Leeds Councillor (a former leader of the Leeds Council) has sent us this unsolicited comment.

"Leeds City Council must object to Bradford's Core Strategy. There is a wholly unnecessary incursion into the Green Belt in Tong Valley and the Westgate Hill. This land is crucial as an environmental asset but also as the green wedge that separates the massive conurbations of Leeds and Bradford. I shall be doing everything I can to support the Tong/Fulneck Valley Association but the powers that be in Leeds City Council must not

let us down. Cllr Andrew Carter."

Assist in safeguarding the countryside from encroachment

33. Bradford's policy to create the Urban Extension would have the opposite effect of safeguarding the countryside from encroachment.
34. As has been indicated above, Bradford's housing policy has been to extend, by gradual steps, the urbanisation of the District into the Green Belt in SE Bradford. The sensitivity of the Tong Valley to such creeping urbanisation is recognised in the Landscape Character Supplementary Planning Document: Volume 7: Tong Valley (The "Landscape Character Assessment") at paragraph 4.1 which states:

"This unit of landscape is not continuous with other large areas of countryside, but enclosed by settlements on all sides. Most of these are under pressure to expand in some way, and as the adjacent settlements of Pudsey, Holmewood, Birkenshaw, Drighlington and Gildersome are all on higher ground, development will be very visible from Tong Valley. There is a real danger that the rural character of the valley will be fragmented and overshadowed by development along these skylines."
35. Any examination of the topography of the Tong Valley would show that, with the exception of the area of Green Belt Land to the north-west of Holme Wood and towards Tyersal, any further housing development would produce a significant encroachment into the Tong Valley, a very important peninsular of Bradford, a tongue of land which penetrates deep into the boundaries of Leeds.
36. The map at page 7 of the Growth Assessment shows that the Tong Valley contains three areas of ancient woodland. Of the two larger areas the northern wood, Black Carr Woods at 30.10 hectares is the largest area of oak wood in the Bradford District and according to the Landscape Character Supplementary Planning Document: Volume 7: Tong Valley (The "Landscape Character Assessment") it is one of the most natural ancient woods in the County. It is shown on the map at page 8 under the SEGIS/RIGS legend. Part of Black Carr Woods lies within the Leeds MDC boundary. The other large area of ancient woodland, Park Wood (or Shackleton Wood) is shown on the map at page 8 as being a "Bradford wildlife area", as is the third, much smaller wood, Kit Wood.
37. This is a valley of grade 3 agricultural land characterised by largely gently rolling open fields divided by narrow wooded footpaths and rural lanes and small streams and becks with long vistas eastwards into Leeds, and north/south between the historic settlements of Tong and Fulneck.
38. The Tong Valley contains viable agricultural based businesses, including an expanding Farm Shop selling home reared lamb and beef which graze on the land earmarked for the urban extension and two livery stables and riding schools. These businesses provide employment and are wholly dependent upon the land for their survival.
39. Whilst the Growth Assessment comments (at page 11) that *"The Bradford Landscape Assessment outlines that the South East area generally has a moderate to weak character. It cannot be classed as sensitive to further development though there are still fragments of landscape that should be protected from further development"*, an examination of the Landscape Character Assessment does not support that statement so far as it relates to the Tong Valley, which can scarcely be described as a "fragment of landscape". The Landscape Character Assessment actually concludes at paragraphs 5.1 and 5.2 that *"The Tong Valley has moderate strength of character; high historic continuity; is not remote; but has little twentieth century development and has immediate pressures on the integrity of the landscape unit. In summary, it can*

therefore be seen to be sensitive to further development.” “Taking account of the traditional settlement pattern and the sensitivity of the character area (in particular the village of Tong) it can be seen that in landscape terms the Tong Valley has limited potential for further development relative to other character areas.”

40. We are obviously concerned that the Growth Assessment has misstated or misinterpreted the Landscape Character Assessment in this way. It is clear that the Tong Valley has only limited potential (probably around the Tyersal area) for further development and that the Urban Extension would irreparably damage the landscape.
41. Permanence and openness are the essential characteristics of the Green Belt (paragraph 79 NCCF). These are the characteristics at present borne by the Tong Valley as evidenced by the Landscape Character Assessment and the Tong Conservation Area Assessment referred to in paragraph 44 below. This is the exact antithesis of Bradford’s policy of creeping extension into open countryside.

Preserving Character and nature of historic settlements

42. The Growth Assessment refers to the contribution of the Green Belt at Holme Wood to *“preserving the setting of the Conservation Areas and Historical Assets”*.
43. The Tong Valley includes 44 listed buildings of which two are grade I and seven grade II*. In the centre of the Tong Valley is the Conservation Area of Tong Village, shown on the map at page 9 of the Growth Assessment. To the immediate north of Tong Village across the District boundary and about 1/3 mile into Leeds MDC is another Conservation Area, that of Fulneck. The two Grade I listed buildings are located in Tong Village, namely Tong Hall, a Queen Anne mansion, and St James the Great Church, Tong a perfectly preserved Georgian Church built on the site of the only verified 11th century church in the County. Ryecroft Hall, a Grade II* listed Tudor hall would be surrounded by housing if developed on Site 2 on the NDP Plan.
44. We contend that the Green Belt in the Tong Valley is an essential element in preserving the character of the Tong Village Conservation area on the south side of the valley and the Fulneck Conservation Area within Leeds MDC on the north side. There is an historical link between these two settlements, as the site of the Moravian Settlement at Fulneck, then known as Lambs Hill, was identified from the terrace of Tong Hall in Tong Village by the founder of that community Count Zinzendorf, looking across the open valley.
45. The area around Tong Village was from Domesday times farmed as an integrated unit. Until the village and estate was sold in 1941 it was owned and run by the Tempest Family who resided at Tong Hall. The Tong Conservation Area Assessment December 2005 (pages 10, 11, 12 and 38) particularly singles out the value of the Green Belt in its conservation, thus:-

“The designation of Tong as part of a swathe of Green Belt between Bradford, Leeds and the other urban areas has effectively continued the resistance to development which typified the long Tempest era”

“Being able to see each of these settlements helps to place the village in its urban commuter village context, although also being able to see that the nearest settlement is over a mile away and across a valley gives Tong a stand-alone rural feel, and its setting an open and exposed air”

“The main approaches into the conservation area are along Tong Lane and at either end of the village the roadside is studded with mature trees which create a pleasant gateway into the village. In both cases the tree line peters out and views from the road open out onto the fields. At the edge of the conservation area, Keeper Lane becomes a narrower bridleway closely bounded by dry stone walls, snaking through the fields to

Fulneck.”

“The sight of distant settlements across open land gives the village an isolated, self-sufficient feeling.”

46. The proposal to build at Site 3 on the NDP Plan (SE/099 on the SCHLAAF Map) would bring housing into the main approach to Tong Village along Tong Lane, seriously compromising its “stand alone rural feel” and “self-sufficient feeling” which so impressed the authors of the Conservation Area Assessment. Bringing 2700 houses into the valley would remove the feeling of “distant settlements across open land”, and effectively bring to an end the benefits of the period of “resistance to development” resulting from an estate being managed on an integrated basis from Domesday to the Second World War which gives the landscape its unique character.
47. We should say that the negative effects of the Urban Extension apply even more to the Tong Valley as viewed from the Fulneck Conservation Area (shown on the plan at the Leeds City website http://www.leeds.gov.uk/docs/Pudsey%20-%20FULNECK%20CA%20no_6.pdf), as the topography brings almost all the proposed development area into view, so that the impact on the openness of the Green Belt is as great if not greater in Leeds, a factor which has not been considered in the Bradford Growth Assessment, and which may have been apparent had there been active cross-boundary working between the authorities during the preparation of the plan.
48. We contend that it is not possible to retain the values of the Tong Village Conservation Area, nor the Fulneck Conservation Area, whilst planning the development of the Urban Extension on the scale proposed.
49. Rather than extend housing further into the Tong Valley, we believe that Bradford should at this point make a clear statement in the Core Strategy that this area, being the only substantial area of open countryside easily accessible to the population of Bradford on its southern side, should be designated for the period of the Plan as Green Belt, with the intention of incorporating it into the Leeds/Bradford Country Park mentioned at Sub-Area Policy BD1 E 1 at page 74 of the Publication Draft. This is an area which should clearly be retained and developed for leisure and recreation, not housing.

Establishing defensible boundaries for the Green Belt

50. The NPPF sets out guidance in relation to Green Belt boundaries at paragraphs 83-85 incl.
51. At present the boundaries of the Green Belt at Holme Wood and Tong follow natural and clearly recognisable features, in the main the lines of the ancient rural highways traversing the former Tempest estates, Holme Lane and Raikes Lane. An exception is at Ned Lane where the Green Belt is drawn to the west of that highway. The sites marked SE/046, SE/056 and SE/060 on the SCLAA Map fall within that area, and we would not argue against a limited local Green Belt release to bring the Green Belt Boundary up to the natural line delineated by Ned Lane.
52. However it is clear from the Growth Assessment Map that development on the sites identified would result in no natural or defensible boundary. In the case of SE/100, the northern boundary is Raikes Lane, but the eastern boundary is an arbitrary field division which shows no distinctive features. It is easy to contemplate further attempts to extend this proposed development site further to the east, to New Lane or beyond, which would have a devastating effect on the openness of the valley, the setting of the Fulneck Conservation Area and the openness of the field landscape in the direction of the terrace of Tong Hall. SE/SP/002 is the most sensitive part of the Tong Valley, providing a panoramic point for views to Fulneck and Tong Hall and the natural vanishing point of views up the Tong Valley from Fulneck and Tong. SE/SP/002 straddles Ned Lane and has an eastern boundary which is totally arbitrary. Any development at

the north of this site would be a threat to the site of ecological/geological importance (SEGIS) at Black Carr Woods and the absence of a defensible line to the east would inevitably open the Tong Valley to future development as far as the Leeds boundary at Scholebrook.

53. The fragility of the boundaries which would result from the Urban Extension at Holme Wood is demonstrated by the attention given to Site SE/101 in the most recent iteration of the SHLAA Map. This site, although noted as *"not attached to the main urban area and is presently on its own considered to be an unsuitable location for residential development"*, would not suffer that disadvantage if Site SE/100 came into play, and, as Site SE/101 crosses New Lane and Raikes Lane, it marks a clear ambition for Bradford Planners in the longer term and a perfect reason why, in accordance with NPPF Paragraph 85 the Core Strategy should *"define boundaries clearly, using physical features which are readily recognisable and likely to be permanent."*

Assist in urban regeneration by encouraging the recycling of derelict and other land urban land

54. We welcome the statement in Strategic Core Policy 5 (SC5) on page 49 of the Publication Draft giving larger urban extensions in sustainable locations the lowest priority in land allocation, but, as we have pointed out in a separate representation, Bradford contradicts this policy in its Housing and Delivery Strategy in Table 1 at page 358 of the Publication Draft when it says that work on the Holme Wood Urban Extension will be beginning to show results in years 4-8 of the Plan.
55. National policy clearly regards the use of the Green Belt as a last resort and not a convenient source of land for early intervention. Paragraph 84 of the NCCF expressly encourages development to be channelled towards urban areas within the Green Belt or towards areas outside the Green Belt. This is to encourage developers to take up brownfield, and greenfield sites within the urbanisation wherever possible. We have quoted in another representation the statement by the Minister of Housing, Kris Hopkins M.P. in January 2014 in which he expressed the view that Bradford could, and should be encouraged to, build up to 20,000 new homes in the canal area. We support the view that more brownfield sites nearer to the heart of the Regional City of Bradford could be utilised, and that such a policy would be more in accord with the NCCF than the policy of the Urban Extension as set out in the Publication Draft. (A full copy of the Minister's statement is set out in Part C of the Schedule to this representation).
56. The Urban Extension at Holme Wood, disconnected as it would be from the existing estate, and with access prioritised onto the A650 at Westgate Hill rather than into the Regional City of Bradford, would (contrary to paragraph 84) channel the development not into an urban area within the Green Belt, but into a non-urbanised part of the Green Belt.

Conclusion

57. For the reasons given above, we suggest that the Urban Extension contravenes national policy and should be struck out of the Core Strategy with appropriate consequential amendments.

Other representations

58. We have made separate legal representations, firstly about what was in our view a flawed consultation process and secondly about the legal basis of the NDP itself. We have submitted a Duty to Cooperate representation. We have also submitted three other representations as to the soundness of the Plan, including a representation relating to Bradford's references in the Core Strategy to a Leeds Bradford Country Park.

59. We incorporate by reference and repeat in this representation such relevant particulars and evidence as appears in our other representations which may also be relevant to our suggestion that the Plan is not in accordance with national policy

Particulars of the Tong and Fulneck Valley Association

We are a non-profit making Association whose objects are the conservation, protection, maintenance and enhancement of the Tong and Fulneck Valley and its environment. We are governed by a Board of Trustees. We have 497 members most of whom live within the immediate area of the Tong Valley, and many of whom are active users of the footpaths and bridle-ways within the Tong Valley either as walkers, cyclists, horse riders or lovers of the flora and fauna of the Tong Valley. This representation has been authorised by a resolution of the Board of Trustees dated 20 March 2014.

SCHEDULE

PART A

Extracts from the Minority Report of the independent members of the Holme Wood and Tong Partnership Board

"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.

11.3. We would also like to see the NDP contain a more positive statement as to the community benefit currently derived from the green belt land, the benefits of avoiding coalescence with the neighbouring authorities of Leeds and Kirklees through the defence of the green belt in South Bradford and at Tong, and a commitment to supporting community development of the Tong Valley countryside as an accessible recreational facility for Holme Wood and Tong and visitor attraction for residents across Bradford and in neighbouring authorities."

PART B PETITION TO BRADFORD COUNCIL

"We, the undersigned, are appalled by the proposals of Bradford Council to build 1800 new homes in the Westgate Hill area of Bradford from Tong Lane across to Raikes Lane – for the following reasons:

- The land to be built on is all greenbelt protected land, and for centuries has provided a vital countryside 'lung' between Leeds and Bradford.
- The land is adjacent to the heritage sites of Fulneck and Tong, and the scale of the building development will damage the unique setting that this land offers them, and all who enjoy the recreational opportunities they offer.

- The scale of the development will result in a huge increase in traffic, particularly on the Wakefield Road/Tong Street, in Tong Lane, and in the narrow farm roads between Holme Wood and Tong Village, resulting in the area being even more gridlocked than it is already.
- The new road that is planned to begin at the end of the Drighlington bypass into the top of Raikes Lane will become a most dreadful 'rat-run' into Holme Wood, as motorists try to avoid the escalating traffic congestion.
- The proportion of new housing that our area is being required to provide (10% of the total in the City region) is completely disproportionate to the total amount required.
- Those who will come to live in these new homes will bring little or no economic benefit to Bradford, as they will be seeking schools, employment, leisure and shopping opportunities in Leeds and Kirklees.
- We are appalled at the suggestion that this will somehow bring benefit to Holme Wood. We believe that this is a crude attempt to try and seduce local people mostly living in an area of high social disadvantage to agree to a scale of housing development that is entirely inappropriate.

We request that Bradford Council radically changes its plans, and limits any housing development to areas that do not require release of the greenbelt protected land in this area. "

PART C

Statement Kris Hopkins M.P. Minister of Housing to Telegraph & Argus

'We don't need to build on green land' says housing minister Hopkins

6:00am Tuesday 14th January 2014

Exclusive By Rob Merrick

New Housing Minister Kris Hopkins today denies Bradford has a homes crisis – and accuses Council chiefs of failing to exploit the "huge amount of land on offer".

In an interview to mark three months as a minister, the Keighley MP rejected the "crisis" word used by the National Housing Federation to describe Bradford's plight.

Instead, Mr Hopkins – while admitting to a "challenge" – called for a redoubling of efforts to provide the extra thousands of new homes the district needs.

But he also vowed he would be "pushing back" to protect green fields in his own constituency, despite David Cameron's orders to hit housebuilding targets.

Mr Hopkins said the extra homes could be found by:

- *Looking to Bradford's canal area – saying: “There is a great opportunity for 20,000 houses. I'd like to see that project expand and accelerate.”*
- *Bringing empty homes – which were particularly common in areas with large Asian populations – back into use / Identifying and selling off local Council-owned land – allowing the authority to tap into extra Government funds.*

Mr Hopkins said: “The word crisis has been rolled out time and time again. I think there's a challenge that needs to be addressed.

“I think the Council is facing up to it in its local plan, but Bradford itself is not short of land – particularly around the canal area.

“When I look back to the stock transfer, there was a huge amount of land retained by the Council on our old housing estates. We need to utilise some of that.

“It's not just about building new houses, but about getting empty houses back into use as well. If we can do that, we can really make a difference.

“Lots of grandparents and parents went out and bought homes, particularly in Kashmiri and Pakistani communities, and we need to make sure those empty houses are brought back in.”

Growing pressure to build more homes has sparked fears that the district's green and beautiful spaces will be concreted over – but Mr Hopkins insisted that was unnecessary.

Indeed, he vowed to stand shoulder-to-shoulder with residents in the Wharfe Valley against what he described as “outrageous” housebuilding targets.

The minister said: “The challenge is in the centre. The housing population boom is not in Keighley and Ilkley – it's in the centre of Bradford.

“Taking my ministerial hat off and putting my MP's hat on, some of the figures they've talked about across Keighley and Shipley are outrageous.

“I'm sure Philip Davies would say the same and we will certainly be pushing back on those.

“There's one road running through the centre of the Wharfe Valley and it couldn't cope. Look at Addingham, where I think 5,000 houses was suggested, a ridiculous number.

“It is an easier process for the Council to look around its green fields – the leafy bits of the district.

“It needs to go back into the centre and ask, ‘Where are the brownfield sites?’ ‘How can we bring the empty homes back into use?’ ”

Fears of a Bradford housing crisis were stoked late last year, when the National Housing Federation warned “prices were spiralling out of the reach of people”.

The average house price is £142,000, yet average annual earnings are £18,500. Meanwhile, more than 20,000 people are stuck on a waiting list for social housing.

Labour-run Bradford Council has acknowledged the district needs an extra 42,000 homes by 2030, which involves building more than 2,000 each year, but only about 900 are built, of which only a small proportion are "affordable".

The report came out around the same time as official figures revealed the number of affordable homes built across the country had plummeted by 26 per cent.

But Mr Hopkins insisted: "The Prime Minister has asked me to go out and deliver our housing commitment. That's 170,000 affordable houses – to build them all by 2015.

"We've built nearly 100,000 already, so – with 16 months to go to the election – we are slightly ahead of target."

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.

All references to the Urban Extension on the plan at Page 67, at Policy BD1 C.1 (page 73), Paragraph 4.1.3 (outcomes by 2030) (Page 64), Sub-area Policy BD2 E (Page 79) Paragraph 5.3.22 (page 158), Paragraph 5.3.34 (Page 161) Paragraph 5.3.35 (Page 162) Paragraph 5.3.37 (Page 162) Policy HO2 B 2 at Paragraph 5.3.37 (Page 163), Paragraph 5.3.42 (Page 164), Paragraph 5.3.61 (Page 169), Table 1 to Appendix 6 at Page 358 and Appendix 6 paragraph 1.9 (Page 363) should be deleted and the reference to the target number of 6000 in respect of SE Bradford at paragraph 5.3.38 amended to 3,900 (reflecting the 2100 homes envisaged by the NDP to be constructed in a green belt release at Holme Wood) with the 2100 added as appropriate to other sector allocations either in the Regional City of Bradford or the wider District, and a statement included in Paragraph 3.103 (or elsewhere if appropriate) recognising the need to retain the Green Belt in the Tong Valley; References in Sub-Area Policy BD1 paragraph E1 to "the green belt between Leeds and Bradford" to be amended to read "the green belt between Leeds and Bradford including the Tong Valley", the tag marked "Leeds Bradford Country Park" on Figure BD1 to be also shown over the Tong Valley area south of Pudsey, and reference to "Esholt Tong Valley" in Policy EN4: Landscape on page 232 be corrected to identify Tong Valley separately in its own right.

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, I do not wish to participate at the oral examination
YES	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 separate representations if we were to be examined orally. This would be particularly helpful in relation to references to plans and maps.

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:	Authorised by resolution of the Trustees of the Tong and Fulneck Valley Association dated 20 March 2014	Date:	24 March 2014
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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.

