



For Office Use only:		
Date		
Ref		

## 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]	
Line 2	[REDACTED]	
Line 3	BRADFORD	
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.

For Office Use only:			
Date			
Ref			

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

**3. To which part of the Plan does this representation relate?**

Sections	4.1 5	Paragraphs	Figure BD1: Spatial Vision  5.4 48-49  5.4.80-98	Policies	Sub-Area Policy BD1 E 1.  Policy EN4 A
----------	----------	------------	--	----------	--

**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.**

## 1. Grounds of Representation

- 1.1. We contend that the Plan is unsound in that it is not positively prepared/justified/effective.
- 1.2. This representation relates specifically to the failure of the Plan to recognise the special landscape character of the Tong Valley in SE Bradford, the historical significance of that area and of the conservation area comprising Tong Village and the place of the Tong Valley and Tong Village in relation to the historic Moravian settlement and village of Fulneck (part of Leeds MDC).
- 1.3. We ask for revision of the Plan to recognise those features as well as the cultural, recreational and leisure potential of the area and to make it clear that Tong Valley will be included in proposals for a Leeds/Bradford Country Park.
- 1.4. We also ask for the correction of an apparent error in Policy EN4.

## 2. Particulars of Representation and supporting evidence

- 2.1. We have made representations elsewhere about the Bradford MDC ("Bradford" or the "Council") plans for an Urban Extension in the Tong Valley, which we oppose. This representation is independent of those representations and is applicable whether or not the Urban Extension proceeds. We feel that the cultural, recreational and leisure potential of the Tong Valley is substantial. If the Urban Extension precedes the need to make full use of this potential will be just as important as it would be were the Tong Valley to remain unchanged as an important part of the Green Belt between Leeds and Bradford.
- 2.2. Tong Valley is shown at Figure EN4: The Bradford District Landscape Character Areas on page 234 of the Core Strategy Development Plan Document: Publication Draft (the "Publication Draft"). It is more particularly delineated on the plan at page 10 of the Landscape Character Supplementary Planning Document: Volume 7: Tong Valley October 2008 (The "Landscape Character Assessment").
- 2.3. The Tong Valley can also be seen on the plans at pages 6, 7, 8, 9 and 10 of the Bradford Growth Assessment Regional City of Bradford: November 2013 by Broadway Malyan (the "Growth Assessment"). On each such plan the Tong Valley is the land falling within the Bradford District boundary on the eastern side of the settlements boundary.
- 2.4. The map at page 7 of the Growth Assessment shows 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 Assessment it is one of the most natural ancient woods in the County. It is shown on the map at page 8 of the Growth Assessment 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.
- 2.5. The remainder of the Tong Valley is largely gently rolling open fields divided by narrow wooded footpaths, rural lanes and small streams and becks.
- 2.6. The Tong Valley includes 44 listed buildings including two Grade I and 7 Grade II\*.
- 2.7. 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.
- 2.8. 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. Fulneck is a linear settlement built along the contour of the Valley at approximately the level of Tong Hall on the south side. It is a Moravian Settlement founded by Count Zinzendorf at the end of the 18<sup>th</sup> century. He identified the site which he called "Lamb's Hill" from the terrace of Tong Hall opposite. At the centre of Fulneck is the still active

Moravian Chapel. The village street incorporates small cottages and larger buildings forming part of the Moravian Fulneck School, a mixed day and boarding school. There is a Moravian graveyard with numbered grave stones (Moravians do not put names on their graves).

- 2.9. Keeper Lane links Fulneck with Tong Village, crossing the Tong Valley at right angles. It is a narrow leafy track used from early mediaeval times as a pack horse trail which was paved in the 17<sup>th</sup> century. It still incorporates for much of its length the stones which formed the ancient pathway. Hedgerow studies have indicated that it is probably 900 years old.
- 2.10. The Tong Valley in Bradford is linked with the Cockersdale Valley in Leeds. The two valleys fall from west to east and are divided by a ridge or tongue of land at the centre of which is Tong Village, which derives its name from this tongue-like topographical feature. The watercourses running down each valley join to the east inside the Leeds boundary and form the Farnley Beck.
- 2.11. In the 1970s/1980s Leeds and Bradford formed a partnership known as the Tong Cockersdale Countryside Management Project to maintain footpaths and bridleways, arrange signage and manage voluntary work-schemes relating to this landscape area. The Project was based in the farm outbuildings of Tong Hall. However Bradford unilaterally withdrew from this scheme, which had contributed significantly to making this area of open landscape more accessible to visitors.
- 2.12. Leeds, however continued its funding to keep open and well maintained the areas of Green Belt land falling within its boundaries and separating Leeds from Bradford and has developed a successful "West Leeds Country Park and Green Gateways" initiative, which it describes on its website as follows:  
*"An integral part of the initiative is the West Leeds Country Park and Green Gateways trail. The 32km circular trail runs from the city centre, through the green corridor of the Aire Valley and into the countryside around Calverley. From there the trail follows the green corridor between Leeds and Bradford, moving through the countryside south of Pudsey before finally entering the urban areas of Armley and Wortley."*
- 2.13. The countryside south of Pudsey, which is described in that extract, is all the land surrounding the Tong Valley. Very many of the Leeds Country Park and Green Gateways footpaths and bridleways lead to or link with footpaths and bridleways in the Tong Valley. Leeds has also provided signage at these boundary points indicating local historical or countryside attraction across the Leeds District boundary within the Tong Valley. Bradford has undertaken no reciprocal actions and has effectively ignored the recreational and leisure benefits of the Tong Valley.
- 2.14. Footpaths within the Tong Valley continue to be very heavily used, many walkers making a base at Tong Village from which to undergo a circular walk covering both the Tong Valley in Bradford and Cockersdale in Leeds, with walks from Tong to Drighlington, Tong to Black Carr Woods and Tong to Fulneck being particularly popular. There are indications that the area is becoming more rather than less popular with walkers, both locally based and visitors.
- 2.15. The area is also the site of several livery stables and riding schools. Two of these are directly threatened by the proposed Urban Extension at Holme Wood (which is the subject of separate representations by us). However we expect horse riding to continue to be a very popular recreational activity and acknowledge that Bradford has undertaken work in recent years to maintain and improve bridle paths.
- 2.16. The Tong Valley is heavily used by cyclists, particularly mountain bikers. A recent popular activity has been "night biking", mountain biking at night using powerful helmet lamps. This brings a much more youthful group of recreational users within the Tong Valley.
- 2.17. One problem that has been experienced is the use of bridle paths and green roads within the Tong



Valley by 4 wheel drive vehicles and quad bikes. This causes damage to the roads and ways and makes them less accessible to legitimate users. Quad bikes are a particular problem in Black Carr Woods. An advantage of Leeds' policy in relation to the West Leeds Country Park is that it has been able to patrol the paths to deter such anti-social usage.

- 2.18. A group of volunteers has recently been formed with the help of the Council. It is called "Friends of Black Carr Woods" and is funded in part by s 106 monies. It is hoped that the activities of these volunteers will contribute to the improvement of the recreational value of that part of Tong Valley.
- 2.19. Tong Village is a Conservation Area, as noted at paragraph 2.6 above. 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"*.
- 2.20. 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 (the "Conservation Assessment")(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."*
- 2.21. St James Church in Tong Village is described in the Conservation Assessment as an *"epitome of the Georgian rural church"* (Hey, 1981). It is Grade I listed for its exceptional importance as it is virtually unchanged internally and externally since its completion in 1727 for Sir George Tempest. As well as being a textbook example of Georgian church architecture and liturgy, the interior of St James's church incorporates the chancel arch and a perpendicular style window of the medieval chapel it replaced (built circa 1140)." It was built by the stonemason John Nelson who went on to become a firebrand Methodist preacher and later a right hand man to John Wesley.
- 2.22. Tong Hall, the other Grade I listed building in Tong Village, with its park, was in the 1970's in the ownership of Bradford Council and open to the public as a museum. Unfortunately Bradford sold the building and the park, which is no longer accessible to the public.
- 2.23. There is a hotel in Tong Village (the Holiday Inn) and a public house, "The Greyhound", an Ice Cream farm shop, a Garden Centre, the largest in the district, and a recently opened Farm Shop at Tong Lane.
- 2.24. There are therefore very many reasons why Tong Village could form the focus for countryside based leisure and recreational centre or country park.
- 2.25. We are very disappointed that the Publication Draft in Sub Area Policy BD1 shows little or no vision for the Tong Valley and its potential as a recreational asset for the population of SE Bradford, the wider population of West Leeds and visitors from further afield. We feel this is a missed opportunity which should be rectified before the Plan is accepted as being sound.

- 2.26. We particularly emphasise that to locate such a Country Park in the Tong Valley would provide direct access to this joint facility to large sections of the populations of South Bradford and West Leeds, which would give it a considerable advantage over the location indicated at Figure BD1 mentioned in paragraph 2.28 below.
- 2.27. At paragraph E 1. of Sub Area Policy BD1 Bradford says that it will:  
*“Enhance the role of the green belt between Bradford and Leeds as a high quality Country Park for active recreational leisure for residents of both districts.”*
- 2.28. That would be admirable were it not for the fact that in Figure BD1: Spatial Vision Diagram on page 76 of the Publication Draft Bradford shows the tag “Leeds Bradford Country Park” as being located to the north of Pudsey somewhere in the Woodhall Hills/Bradford Moor area. We would like to see that figure re tagged to show the Leeds Bradford Country Park as being in the Tong Valley Area also.
- 2.29. This would then be consistent with the Local Infrastructure Plan October 2013 (the “Infrastructure Plan”) which refers at page 42 to: *“An aspiration for a new Country Park in the Tong area to enhance the role of the green belt between Bradford and Leeds as a high quality Country Park for active recreational leisure for residents of both districts.”* We are at a loss to understand why the Core Strategy and the Infrastructure plan differ on the important issue as the location of this Country Park.
- 2.30. Whether there has been any active consultation with Leeds over the “aspiration” for a Leeds Bradford Country Park is unclear. If there has not been, that is another ground upon which this part of the plan is unsound.
- 2.31. However we believe that an “aspiration” is an unsatisfactory objective for a document which sets out spatial visions, and accordingly we would like to see a specific statement in the section commencing at paragraph 4.1.1 and running through to 4.1.10 that one of the outcomes by 2030 will be that:  
*“The Leeds Bradford Country Park builds on the West Leeds Country Park and encompasses the Tong Valley, where people from both Districts, and visitors from out of District, enjoy a high quality experience of the conservation areas of the District and of the recreational and leisure opportunities within the open landscape, woodlands and streams of the Tong Valley”.*
- 2.32. We would like to see the Historic and Landscape values of the Tong Valley being more clearly acknowledged in The Core Strategy (in the section 5.4) as one of the only areas in the south part of Bradford which is easily accessible to a significant part of the District’s population.
- 2.33. We think that particular mention of “Esholt Tong Valley” in Policy EN4 is misleading. There is no place in Bradford of that name, although there is a “Tong Park” at Esholt. It may be that this is merely a drafting error and that the authors of the Publication Draft intend to refer separately to Esholt” and “Tong Valley”, in which case we would ask that the error is corrected. It is important that development in the Tong Valley is subjected to careful scrutiny and analysis as to impact.
- 2.34. If Policy EN4 is to apply to Tong Valley, we would ask that the meaning of the statement in EN4 B is clarified *“In circumstances where impacts can be managed and the degree of change made acceptable, contributions need to relate to the scale of the project under consideration, the significance of any assets affected.”* as this is currently ungrammatical, but more particularly open to wide interpretation, which, in a Policy Statement, would be best made plain.

### 3. Conclusion

We believe that the Tong Valley is an immensely valuable recreational and leisure asset for Bradford with important historical associations. Bradford has in the past paid little attention to the important area, first

by selling Tong Hall, then by pulling out of the Tong Cockersdale Partnership and now by proposing that the area should be the site of an urban extension. We feel that this position should be rectified by the positive statements in the Core Strategy that we are suggesting and that real vision should be displayed now for its future.

## 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.

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.

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.

Reference to “Esholt Tong Valley” in Policy EN4: Landscape on page 232 be corrected to identify Tong Valley separately in its own right.

A statement to be introduced in sections 4.1.1 – 4.1.10 that:

“The Leeds Bradford Country Park builds on the West Leeds Country Park and encompasses the Tong Valley, where people from both Districts, and visitors from out of District, enjoy a high quality experience of the conservation areas of the District and of the recreational and leisure opportunities within the open landscape, woodlands and streams of the Tong Valley”.

Policy EN4B to be clarified as requested above.

Section 5.4 to be strengthened to emphasise the historical, recreational and leisure importance of the Tong Valley.

*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 representations if we were to be examined orally. This is particularly relevant where references are made to maps and plans.

**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.**

<b>9. Signature:</b>	Authorised by resolution of the Trustees of the Tong and Fulneck Valley Association dated 20 March 2014	<b>Date:</b>	24 March 2014
----------------------	---	--------------	---------------

**Core Strategy Development Plan Document (DPD) : Publication Draft**

**PART C: EQUALITY AND DIVERSITY MONITORING FORM**

