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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	SMITH	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	TONG	
Line 3	BRADFORD	
Line 4	WEST YORKSHIRE	
Post Code	BD4 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 24th 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  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 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

The Plan is unsound in that it is not in accordance with national policy.

## Particulars of Representation

1. This relates to that part of the Core Strategy Development Plan Document Publication Draft which refers to an urban extension at Holme Wood. The 2008 NDP states that 2700 new houses are planned for this, 2100 of which will require Green Belt release in the Tong Valley originally identified as sites 1,2 and 3.
2. 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").
  - 2.1. Site 1 on the NDP Plan includes sites SE/060, SE/055 and SE/046 on the SHLAA Map";
  - 2.2. Site 2 on the NDP Plan includes Site SE/100, SE/061 and a part of Site SE/099 on the SHLAA Map; and
  - 2.3. Site 3 on the NDP Plan comprises part of SE/099 and the whole of SE/057 on the SHLAA Map.
3. 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.
4. 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".
5. As will be demonstrated later, the ever expanding plans referred to above indicate that Bradford Council have no sensitivity to the historic, geographical, topological, environmental and social importance of the Tong Valley Green Belt. Firstly by allocating an initial 1800 new houses in the heart of the valley and even before gaining approval for the plan, increasing the number of houses destined for those sites, then adding a significant 54.1 acre site even deeper into the valley which in combination almost double the initially specified requirement of 1800 houses which forms a contribution to the Plan's total requirement of 3 42087 for the region
6. 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. 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.
7. Bradford also argues that development at these sites would provide funding for the regeneration of Holme Wood but that would not constitute exceptional circumstances within the terms of the NPPF
8. Paragraph 88 of the NPPF makes it clear that "*very special circumstances*" only apply when the potential harm to the Green Belt is "*clearly outweighed by other considerations*". 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
9. 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.*

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

*Provides a significant contribution to the West Yorkshire Green Belt.".....*

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

11. The Sustainability Appraisal of the Bradford Core Strategy Publication Draft February 2014 by AMEC (the "Sustainability Appraisal") says at page 36 *"Development in .....Holme 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."* However this fails to address the question of scale and location of the releases, and particularly why the most sensitive section of the Green Belt at the Tong Valley is selected 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.
12. 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.
13. 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.
14. It is significant that Leeds MDC has vigorously defended the Green Belt at this boundary with Bradford.
15. There is however 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.
16. A more modest extension is what was sought by the community representatives on the Tong Partnership 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 suggested 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).
17. 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. 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.

18. The Leeds objection was entirely valid at the time it was made, and except for changes in the political composition of Leeds MD Council, the situation has not in any way changed since that time.
19. 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 is simply wrong. 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.
20. 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."* But the Growth Assessment indicates only that development between Bradford and Tyersal can be accommodated without adverse effect on the Green Belt
21. Bradford's policy to create the Urban Extension would have the opposite effect of safeguarding the countryside from encroachment.
22. 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."*
23. 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.
24. 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"*, however this is totally at odds with the Landscape Character Assessment which 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.”*

25. The Growth Assessment has therefore ignored the Landscape Character Assessment findings. 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.
26. 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 below. This is the exact antithesis of Bradford’s policy of creeping extension into open countryside.
27. 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”*. 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 1/3mile 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 11<sup>th</sup> 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.
28. 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.
29. 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."*

30. 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.
31. 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](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.
32. 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.
33. Rather than extend housing further into the Tong Valley, 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.
34. The NPPF sets out guidance in relation to Green Belt boundaries at paragraphs 83-85 incl.
35. 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 it is reasonable for a limited local Green Belt release to bring the Green Belt Boundary up to the natural line delineated by Ned Lane.
36. 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.



37. 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.”*
38. 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. The Minister of Housing, Kris Hopkins M.P. in January 2014 expressed the view that Bradford could, and should be encouraged to, build up to 20,000 new homes in the Canal Road area. This would be more in accord with the NCCF than the policy of the Urban Extension as set out in the Publication Draft.
39. The Urban Extension at Holme Wood, disconnected as it would be from the existing Holmewood estate is planned to have a new access road commencing at the A650 at Westgate Hill. This has 2 major flaws. Firstly it suggests the new residents of the Urban extension will be drawn away from Bradford towards Leeds, Kirklees and the motorway network and yet the new housing is meant to provide homes to support employment growth in Bradford. Secondly the existence of the new access road will act as a conduit for traffic endeavouring to reach central Bradford and whose options previously were largely limited to the extremely congested A650. This would simply lead to a massive increase in traffic reaching the western end of the access road and then having to negotiate the back roads and already busy streets of Holmewood. This is a very ill-considered solution.

- 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.**

For the above reasons the Urban Extension, other than that pertaining to the original site 1 at Holmewood/Tyersal, contravenes national policy and should be removed from the Core Strategy.

*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**

No, I do not wish to participate at the oral examination

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:**

*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:**



**Date:**

24th March 2014

## 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.**

**1. Do you live within or have an interest in the Bradford District?**

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I do not wish to participate in this monitoring exercise

X