

MATTER 6A – SUB-AREA POLICIES

Growth Areas North East Bradford:

6.3a.ii Holme Wood Urban Extension: Is there sufficient justification and evidence to support the proposals for the Holme Wood Urban Extension, including the exceptional circumstances necessary to release Green Belt land, the impact on existing uses, historic/heritage assets, landscape and regeneration, the need for additional infrastructure, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

I Introduction

1.1 The comments set out below relate to solely with the impact which the eventual development of this area might have upon the historic environment.

1.2 The Holm Wood Urban Extension is likely to affect the setting of the Registered Battlefield at Adwalton Moor. Although the Council has produced a *Heritage Impact Assessment*, it provides little evaluation of the likely impact which this development might have upon the Battlefield or what mitigation measures would be necessary to ensure that the significance of this important designated heritage asset is safeguarded.

1.3 As a result, the Council has not demonstrated that:-

- (i) The principle of the Holme Wood Urban Extension is compatible with either national policy guidance or the plan's own Policies for the protection of the historic environment, or
- (ii) Given the need to safeguard those elements which contribute to the significance of the Registered Battlefield at Adwalton Moor, that the quantum of development that would result from the Holme Wood Urban Extension is actually deliverable

2 Importance of the Registered Battlefield at Adwalton Moor

2.1 The Battle of Adwalton Moor (30th June, 1643) played a pivotal role in the series of events that led to Parliamentary victory in the Civil War. The defeat of the Parliamentary forces at Adwalton Moor and the resulting loss of control of the north of England for the remainder of the year convinced the leadership of the Parliamentary cause that victory could only be achieved by seeking the military support of the Scottish Presbyterians. This support was forthcoming and a combined English and Scottish Parliamentary army defeated the Royalists at Marston Moor, York on the 2nd July, 1644.

2.2 The battle of Adwalton Moor was one of movement and ‘encounter’ and the surviving areas of the battlefield allow the course of the battle to be followed by the expert and, with suitable carefully sited interpretation, the battle could be made clear to the general public.

2.3 The *Adwalton Moor Battlefield Heritage Impact Assessment* provides out a good evaluation of the landscape today and the elements which contribute to the significance of the Battlefield

3 The impact of the Holme Wood Urban Extension upon the Registered Battlefield at Adwalton Moor

3.1 Policy BDI proposes an Urban Extension to the north of the Registered Battlefield. The areas which the Council considered suitable for inclusion within this Urban Extension were identified in the “*Holme Wood & Tong Neighbourhood Development Plan (NDP) Final Report*”. These appear in the SHLAA as Sites SE/057, SE099 and SE100. The development of all of these areas could, potentially, affect the setting of the Battlefield.

3.2 The NPPF makes it clear that Registered Battlefields are considered by the Government to be in the category of designated heritage assets of the highest significance where substantial harm or loss should be wholly exceptional. In its response to the Publication Draft, English Heritage Objected to the proposed Urban Extension because there had been no evaluation of the degree of harm which a development of this magnitude might cause to the Registered Battlefield or what measures the Plan might need to put in place to ensure that any harm is removed or minimised. As a result, English Heritage contended that the plan could not demonstrate that the allocation of this area was compatible with need to safeguard those elements which contribute to the significance of the Registered Battlefield.

3.3 Since the Publication Draft, the Council has produced the *Adwalton Moor Battlefield Heritage Impact Assessment*. This document provides a good evaluation of the elements that contribute to the significance of the Battlefield. However, other than for Site SE/056 (which actually lies within the boundary of the designated area and which the Assessment advises should not be developed), the *Heritage Impact Assessment* provides no meaningful evaluation, whatsoever, of the potential impact which the loss of the currently open farmland to the north of the Battlefield and its subsequent development might have upon the significance of this important designated heritage asset.

3.4 The Assessment, rightly, acknowledges that SHLAA Sites SE/057 and SE/099 (Sites 2 and 3 of the Holme Wood Urban Extension) have the potential to

impact upon the setting of the Battlefield. In the case of those parts of the sites adjoining the Battlefield, it highlights the fact that there is the potential to *“impact unacceptably upon key views from the heritage asset northwards”*. However, rather than evaluating precisely what this impact might be (and therefore, whether or not the development of this area would be compatible with the appropriate protection of the significance of the Battlefield (or, equally, what mitigation measures might be necessary to ensure that its development is achieved in a manner which safeguards the setting of the Battlefield)), the Assessment simply advises that *“their development for residential purposes would require careful assessment and a clear understanding of the significance of the battlefield and its setting, with particular reference to views into and out of the battlefield”*.

- 3.5 Given that this development has the potential to harm a designated heritage asset of the highest significance, it is not appropriate for a Local Plan to allocate such a site without first demonstrating that it is capable of being developed in a manner which would be compatible with the requirements to protect that asset as set out in national policy guidance. This has not been done.
- 3.6 As a result, the Council has not demonstrated that the principle of the Holme Wood Urban Extension is compatible with either national policy guidance or the plan’s own Policies for the protection of the historic environment.
- 3.7 In terms of this proposal, the Council has not demonstrated that:-
- (i) The principle of the Holme Wood Urban Extension is compatible with either national policy guidance or the plan’s own Policies for the protection of the historic environment, or
 - (ii) The quantum of development that would result from the Holme Wood Urban Extension is actually deliverable given the need to safeguard those elements which contribute to the significance of the Registered Battlefield at Adwalton Moor,

4 Conclusions

- 4.1 The Council has failed to demonstrate that the proposals for Holme Wood would conserve those elements which contribute to the significance of the Registered Battlefield at Adwalton Moor. As a result, the Plan has not shown that the allocation of this site is capable of being developed in a manner which would be compatible with the requirements to protect that asset as set out in national policy guidance