

CITY OF BRADFORD MDC

LOCAL PLAN FRAMEWORK

EXAMINATION OF THE

BRADFORD LOCAL PLAN CORE STRATEGY

SCHEDULE OF MATTERS, ISSUES & QUESTIONS FOR EXAMINATION

Day 3 (Afternoon) Matter 3 Strategic Core Policies (Cont) SC7 Green Belt

Statement by the Tong and Fulneck Valley Association

Our detailed representations in respect of the matters listed at these sessions are set out in seven forms of submission sent electronically on 25 March 2014 (and submitted also in hard copy) to [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk) identified as *“Comment Form 3 Final not positively prepared soundness”* (“Form 3”), *“Comment Form 4 Final not justified soundness”* (“Form 4”), *“Comment Form 5 Final not effective soundness”* (“Form 5”), *“Comment Form 6 Final not in accordance with national policy”* (“Form 6”) and *“Comment Form 7 Final recreation”* (“Form 7”).

We do not wish to modify our grounds of objection in the light of documents subsequently posted by Bradford MDC (“BMDC”), but to clarify how these representations relate to the questions posed by the Inspector at the relevant sessions, and to respond to **SD/017** the Core Strategy Publication Draft (2014 Background Paper 2: Housing (Part 1) and **SD/006** Duty to Co-operate Statement (February 2015 enlarged version) and to the extent we have been able to analyse them the responses in Summary of Comments Received and Council Response to the Publication Draft Consultation . Our original representations should be read as submitted.

**Question 3.4**

Our major concern relating to SC7, in answer to Inspector’s question 3.4, is that the proposed approach to the Green Belt is neither appropriate, effective, positively prepared, justified, soundly based nor is it consistent with national policy.

We deal with positive preparation in Form 3, justification in Form 4, effectiveness in Form 5 and non-compliance with national policy in Form 6.

BMDC has argued, in consultation meetings, that whether, and where, Green Belt land is released is a matter for separate consideration as to Green Belt release and Allocations DPD.

But in the case of the Tong Valley the facts do not bear out this assertion. BMDC have made the Urban Extension a key strategic element of the Plan. Without the contribution of 2700 homes in the Holme Wood area, they have argued, they cannot achieve their overall numbers or realise their aspirations for regeneration and employment within SE Bradford.

At paragraph 4.50 of [SD/017](#) they say that 2100 houses are needed within the Urban Extension. This can only come from Green Belt land in Tong Valley, and of these 1800 and any additional road infrastructure must fall within the most sensitive part of the Green Belt at that location.

So, release of substantial tranches of Green Belt in this single location, at a critical junction between the conurbations of Leeds, Bradford and Kirklees, has to be a prior issue which should have been subject to joint consideration before the Plan was published, and failure to have done this renders the Plan unsound.

BMDC argument seems to be as follows: We have not selected Bradford SE as a sustainable location for growth because there is a large tract of available land in the Green Belt. We have selected it because it is a good location and meets certain criteria and factors (see answer on page 89 Appendix 7J Summary of Comments Received and Council Response to the Publication Draft Consultation). There happens to be a large tract of available land there, but that is only one of a number of factors. And because it is a good sustainable location it merits exceptional circumstances treatment for release from Green Belt.

Our contention is that from a very early stage, at least as far back as 2008, planners at BMDC identified the Tong Valley as a virgin development zone where substantial additional housing numbers could easily be delivered, coupled with the chance to make use of perceived developer-funding for use in connexion with the regeneration of the Home Wood estate, which they would otherwise have to fund from other sources. This was a new and unilateral proposal made in contrast to BMDC's original UDP and contrary to the RSS proposals for housing growth. We suggest that the work which has subsequently been undertaken has been to justify, in national planning terms, how that could be achieved.

BMDC rely on the Growth Assessment by Broadway Maylan dated November 2013 (the "Growth Assessment") in support of their argument that this is a sustainable and suitable location for development. The Growth Assessment (page 11) however identifies the reasons why the Green Belt serves a valuable function in SE Bradford and then accedes to the idea of large scale housing development at that point, mainly because "*the Holme Wood and Tong Neighbourhood Development Plan (January 2012)* [the "NDP"] *has previously identified potential Green Belt locations within the Holme Wood and Tong area. The potential location for regeneration and Green Belt growth within this*

*Neighbourhood Plan were supported through public consultation”* (Page 11 of the Growth Assessment). This makes for a circular outcome, because the Green Belt release was a proposal of BMDC first advocated in the NDP and the location for Green Belt Growth was emphatically **not** supported by the consultation exercise. So the “objective” assessment produced for BMDC by Broadway Maylan is based upon mistaken belief that there was community support for a green belt release proposal contained in a document produced in the first instance by BMDC itself

For reasons set out in our representations we do **not** believe that this is a suitable or sustainable location.

In Form 6 we say that the Tong Valley exemplifies the purposes served by Green Belt set out in paragraph 80 NPPF. If this piece of Green Belt land is further compromised, the underlying function of the Green Belt between these conurbations will be destroyed. We say that the proposal within the Plan for the Urban Extension at that point would indeed *“undermine the strategic function of the Green Belt within LCR”* contrary to the policy statement at SC7B, and that any material release of Green Belt land at that point would result in uncertain and impermanent Green Belt boundaries contrary to paragraph 83 NPPF.

We do not believe that in drawing up their plans for the Urban Extension BMDC took full and proper account of the factors set out in paragraph 84 NPPF. BMDC have made it clear in the plans set out in the NDP that the main part of the Urban Extension will not be seamlessly attached to Holme Wood. BMDC initially said that it would be reliant upon a link road to the A650. However as stated above they withdrew the link road proposals from the Publication Draft and refer in the plan at Appendix 1 to **SD/006** to a “Tong Street Quality Corridor” only. They now refer in Appendix 7J Summary of Comments Received and Council Response to the Publication Draft Consultation (page 57) to a “South East Bradford Access Route” which does not appear in the Plan, and which is yet another example of the failure of BMDC to demonstrate clearly how it will deal with the highways infrastructure problems.

BMDC have no reasonable or coherent publicly available and funded or fully fundable plan at present which will

- (i) relieve the present congestion on the A650;
- (ii) resolve the issues of natural traffic growth on the A650 to 2030;
- (iii) absorb additional private and public transportation needs generated by the Urban Extension;
- (iv) provide a seamless integration of the Urban Extension and the existing and expanded Holme Wood estate.

We believe that the current proposals result in two separate developments;

the first (which, if done well, we support) an expanded Holme Wood with new infill housing and some Green Belt development to the north; and

the second, a stand-alone development to the south, not independently sustainable, not looking inward towards Bradford, not channelled towards existing urban development, but at best an

independent dormitory for Leeds/Kirklees sustainable only with the support of the adjoining MDCs, to which its residents would look for major retail, health and schooling.

BMDC say in their response to representations in Appendix 7J that they disagree with this latter point, but neither they, in their response, nor any of the studies they have commissioned, bring any evidence to show that this will not be the case.

The Growth Assessment does not in our view reflect the quality of the landscape in Tong Valley and the architectural and historic heritage. The Growth Assessment conclusion does not accord with (and seems not to have considered) BMDC's own reports in the Landscape Character Supplementary Planning Document: Volume 7 (Tong Valley), nor the Tong Conservation Area Assessment.

It is significant that when the NDP was published it entered into no analysis of the character or value of the Green Belt as a providing a green wedge between MDCs, nor as a setting for the Conservation Villages of Tong and Fulneck. These issues are discussed in detail in Forms 6 and 7.

The quality and function of the Green Belt at this point is so substantial that an overwhelming case has to be made for exceptional circumstances for Green Belt release at Tong Valley. BMDC rests its case on two points only; the need to achieve housing numbers and the funding benefits of a concentrated large scale development in one location.

Despite the Plan (SC5) indicating that BMDC would seek to release Green Belt for urban extensions as a fourth priority allocation, the concept of the Urban Extension at Tong being a driver for regeneration funding indicates that BMDC intends the earliest possible implementation of this development. That is borne out in Table 1 of the Plan at page 358 which shows that BMDC expects that the Holme Wood urban Extension would be *"beginning to show results"* in years 4 to 8 (2018-2023), and by paragraph 6.2 on page 121 of the CMDC Local Infrastructure Plan 2013 which, in relation to the Urban Extension, talks of *"the prospects of phased delivery, allied to smallscale infrastructure improvements seeming more likely in the short to medium term, rather than waiting for major infrastructure to take place before any development occurs"*.

The housing numbers currently proposed are substantially lower than those applicable when the Urban Extension was proposed and so it is clear that district numbers can be achieved by adjustment elsewhere. It is a policy choice to put the houses at Holme Wood, not an overwhelming and unavoidable necessity.

As to regeneration funding we point to paragraph 7.17 of the NDP which indicates that *"on/off site infrastructure arising from the development of the site"* would be such as to *"limit[] the potential for contributions to other regeneration interventions within Holme Wood"*. In other words the new development creates its own funding needs and does not solve that of the earlier development.

We ask for the references to urban extension at Holme Wood to be removed from the Plan because it is not sound with them in, but if a Green Belt review is contemplated this should be undertaken in co-ordination with adjoining authorities and should certainly include a specific focus on the function of the Green Belt at the Tong Valley triangle.

## SCHEDULE

Documents referred to in this statement:

Appendix 7J Summary of Comments Received and Council Response to the Publication Draft Consultation

The Growth Assessment by Broadway Maylan dated November 2013(the "Growth Assessment")

Holme Wood and Tong Neighbourhood Development Plan (January 2012)

The Landscape Character Supplementary Planning Document: Volume 7 (Tong Valley)

The Tong Conservation Area Assessment

CMDC Local Infrastructure Plan 2013