

CITY OF BRADFORD MDC

LOCAL PLAN FRAMEWORK

EXAMINATION OF THE

BRADFORD LOCAL PLAN CORE STRATEGY

SCHEDULE OF MATTERS, ISSUES & QUESTIONS FOR EXAMINATION

Day 7 Matter 6A Sub-Area Policies City of Bradford

Our detailed representations in respect of the matters listed at these sessions are set out in six 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 1A Final Legal” (“Form 1A”), “Comment Form 2 Final Duty to Co-operate” (“Form 2”), “*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 s 6.2 and 6.3 a**

In this statement we wish to highlight and focus our representations on the specific issues to be examined at this session.

We wish to express the very strong wishes of our membership that references to the proposed Urban Extension at Holme Wood (the "Urban Extension") should be removed from the Plan and that the Plan should be strengthened with a positive statement recognising the positive contribution of the Tong and Fulneck Valley both in fulfilling the functions of the Green Belt as set out in paragraph 80 NPPF and as one of the only extensive natural green spaces easily accessible to the residents of the southern part of the City of Bradford.

We represent over 450 individuals including residents within the Holme Wood area and Tong Conservation Village (BD4 postcode), councillors and residents in adjoining authorities, including many people with an interest in the Fulneck Conservation Village and walkers, birdwatchers, cyclists, horse riders coming from the immediate area and from further afield.

We have also delivered to BMDC during the consultation period on the FED a petition of over 1000 local residents opposing the large scale development and Green Belt release proposed.

We are not opposed to all development in the area and we have set out in our representations our belief that Holme Wood and the Tong area can absorb up to 900 additional homes out of the target for SE Bradford, but that that target should be reduced from 6000 by the 1800 homes that Holme Wood and Tong Neighbourhood Development Plan (January 2012) (the "NDP") and the Growth Assessment by Broadway Maylan dated November 2013 (the "Growth Assessment") indicate should be placed within the Tong Valley. We think that growth at the level we propose would help regenerate Holme Wood and would produce an integrated and sustainable community. It would of course have to be coupled with targeted and appropriate levels of infrastructure to meet the existing shortfalls as well as the needs of the new development

We argue that the proposed Urban Extension would in the scale contemplated by BMDC be excessive and would not be sustainable, and that hence reference to it in the Plan is unsound.

The reason why we support strongly the regeneration of Holme Wood is because Holme Wood is itself a development which was conceived and has since expanded without proper infrastructure and integrated management. It is itself not sustainable. It houses some of the most disadvantaged members of our community with very high levels of joblessness, poor health, low income, low educational outcomes and overall low esteem. It deserves focus and investment. But curiously many of the most effective means of regenerating an area such as Holme Wood do not come from high cost capital projects, but from a joined-up approach to problem solving.

One of the few things that we in BD4 have which is free, immediately accessible and which can provide some joy for those who have little other pleasures in their lives, is the beauty and tranquillity of the Tong Valley, the opportunity to get out into the natural countryside, to walk to Fulneck Village, to enjoy the views over to Tong and down to Leeds, to see the many horses in the stables in Raikes Lane and the cows and sheep grazing at Lane End Farm.

These are what BDMC proposes to take from the residents of Holme Wood and Tong, and it is not surprising that they and our members are distressed.

And why are BDMC proposing this? We believe that the proposal is primarily motivated by the financial incentives which BDMC saw in 2007/8 when they first made known their plan. The economy has changed, the funding routes have changed. So also has the understanding of how much infrastructure a new development needs to support itself as a sustainable community. This means that if BDMC still sees Green Belt release at Holme Wood as a prime funding source for Holme Wood regeneration, it is wrong.

BDMC owes a moral duty to Holme Wood to put right the deprivations to which the poor planning of earlier years has contributed. But it should not do that at the cost of creating a new planning error by allowing the creation of another urban fringe community which has no economic or social connection with the City, which will not contribute to the social regeneration of Holme Wood, which will destroy valuable countryside and which will encourage urban sprawl.

Of course our representations set out extensively all the other issues the Urban Extension highlights, including, but not limited to

- the fact that there is no overwhelming case of exceptional circumstance to justify the release of the Green Belt land needed for the Urban Extension;
- the fact that the Green Belt land in the Tong Valley triangle fulfils the paragraph 80 NPPF functions to the greatest degree in the LCR, and would not do so if there was further erosion of it;
- the contrast between the way that Leeds City Council has invested in, developed and maintained a continuous and accessible Country Park along the length of its green belt land in West Leeds and the way in which BDMC has withdrawn from partnership with Leeds over the Tong and Cockersdale Valley and allowed urban sprawl into the head of the Valley;
- the failure of BDMC to give proper weight to the requirements of paragraph 84 NPPF in formulating its proposals for the Urban Extension;
- the absence of further natural boundaries to the west of Ned Lane to indicate a viable and lasting western edge to any Green Belt release which could prevent development taking place even further down Tong Valley than mooted in the NDP+;
- the failure of BDMC to recognise the value of its historic assets in the Tong Valley including the Tong Village Conservation area, and to plan for the full use of leisure and recreational opportunities for the benefit of the whole LCR;
- the failure of BDMC to properly appreciate that the location of the "Tong Valley triangle" as it cuts deeply into the territory bordered by Leeds MDC, requires an approach that recognises the integrity of the land that they separately administer and work together on an appropriate common vision and plan for this important landscape;
- the ludicrously inadequate attempts by BDMC to square the circle of how to deal with the worst traffic congestion in the whole district and simultaneously to bring into the highways system the traffic generated by another 2700 homes without channelling existing traffic into the new development or the new developments traffic into the A650 and the already over congested highway systems in the adjoining authorities;
- the general absence of convincing evidence that the new development at Tong (as opposed to the moderate, integrated expansion of Holme Wood) would be anything other than a dormitory for workers in Leeds or Kirklees placing an unplanned strain on infrastructure in those MDCs;
- the strong expectation, born out by express words in the Bradford Infrastructure Plan, that the Urban Extension would be started piecemeal without proper infrastructural works and that BDMC

would thereafter struggle to fund the integrated support infrastructure needed to complete the development.

Finally we support and encourage to building of new homes in the district, but recognise that the economic and commercial reality of the planning system is that, if a planning authority opens the door to the possibility of development on Green Belt sites, the developers will walk through that door and turn their backs on any other more difficult development on brownfield land. Bradford desperately needs more houses in the City Centre. It does not need more houses on the urban fringes. Our view is that only by removing the reference to the Urban Extension and making a strong commitment to the retention of the Green Belt function at Tong Valley will this area of countryside be protected from the threat of opportunistic cherry-picking development.

\*the CMDC Local Infrastructure Plan 2013 paragraph 6.2 on page 121 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 Holme Wood and Tong Neighbourhood Development Plan (January 2012) contains plans showing possible locations for the Urban Extension

## 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)

CMDC Local Infrastructure Plan 2013