

Matter 3

Policy SC3 Green Belt

PS/FO67 CBMDC “Further Statement on Exceptional Circumstances for Green Belt Release”

### **Comments in Response - Gordon Dey**

Bradford Council’s latest statement of its intention to seek very substantial release of land currently afforded Green Belt protection is unsatisfactory and unconvincing. The Council has highlighted that such land will be required for both housing and employment use. They make it clear that in addition to release for housing their plans must include large scale release of green belt in for employment use – previously indicated in the Strategic Growth document, but not adequately spelt out in the Core Strategy.

My comments relate to their intention for the release of such land in South East Bradford so that their plans for the building of a large Urban Extension to Holme Wood can be approved.

### **Exceptional Circumstances – Housing Need**

The Council’s ‘exceptional circumstances’ argument continues to be the need to find land to meet their housing requirements. I would urge that with regard to South East Bradford this is rejected for the following reasons:

- Green belt release ‘exceptional circumstances’ is not to be justified only on the basis of housing need, yet this continues to be the Council’s only justification.
- The Holme Wood Urban Extension in Bradford South East will invade sensitive and important countryside that provides a precious ‘lung’ between settlements, and will threaten the value of heritage communities.
- It is entirely unacceptable that such a scale of development in South East Bradford can be proposed without the plan having sufficient detail for it to be properly examined, so that its impact on the green belt can be identified.
- Despite it being clear in the NPPF that green belt release must be achieved through co-operation with other neighbouring Local Authorities, Bradford Council give no indication in their latest statement that they recognise this, nor of them having undertaken this.
- I continue to maintain that the land that is proposed for such release in Bradford South lies in the ‘Tong Triangle’ and cuts deeply into Leeds territory. The unusual nature of this topography requires even greater collaboration and so must have regard to the views of Leeds Council, and be sensitive to their policy regarding adjoining land under their jurisdiction. There is no sign of this being recognised.
- It is entirely inappropriate to describe Holme Wood as a ‘key market location’. Incommunities, Bradford’s main social housing provider following previous Council Stock transfer is currently having increasing difficulties in achieving a satisfactory letting level of properties in Holme Wood. The invasion of further adjacent land to create a ‘Holme Wood Extension’ may well prove to be unsustainable – and certainly Bradford Council have yet to show how sustainability in such a challenging position would be achieved.
- Despite the above, I accept and would support the option of up to 900 homes being built that can be achieved, some of which would be in green belt territory, but without such strategic invasion. Such an amount is generously proportionate, achievable, and sustainable.

### **Exceptional Circumstances – Employment Use**

Many of the above points also relate to the release of green belt land for employment use – however there is an indication here that the Council would be looking for a substantial location that could form an Industrial Estate of varied units and provision. If there were to be the case, then the following points pertain:

- The need for adequate transport infrastructure that does not require access through the Holme Wood estate would be vital, and would probably require a major new highway such as that being muted as a new Link Road to Thornbury from Westgate Hill. If this were to be introduced then a corresponding even greater

loss of additional green belt protected land would be inevitable, and the invasion of this precious countryside would be comprehensive and devastating.

- The invasion of the landscape with such a large scale industrial feature would be entirely out of character to the countryside that would remain, thus damaging further this important opportunity for recreation and leisure development for future generations, as well as appropriate economic growth and development.
- It is entirely unsatisfactory that Bradford can be making such proposals without any apparent agreement with Leeds, despite the fact that such a road would require a route that would traverse Leeds territory.
- The continued expansion and development of land adjacent to the Euroway Industrial estate offers a much better option for employment development than invasion of green belt land in South East Bradford.

Bradford Council claims that there is 'Potential to release green belt land without significantly undermining the functioning of the green belt at a local and strategic level', yet they include no justification for this, as no Green Belt review has taken place to sustain such a statement. The Council generally states that it can be achieved on three sites, including a major site in South East Bradford that is substantial enough as to provide an Urban Extension that would amount to at least 1000 new homes. All the evidence from a variety of sources, particularly the so-called Tong and Holme Wood NDP, suggests that it will be much larger, and will require substantial green belt release to achieve 2,700 dwellings.

It is my view that they are mistaken in claiming that such release will not significantly undermine the functioning of the green belt in Bradford South East. The land they propose to adopt is highly sensitive and uniquely sited close to vast urban conurbations. We are extraordinarily fortunate that it has been retained in this way, mostly through it having been part of the ancient Manor of Tong, and we must retain our responsibility to sustain such protection. The existence of vital heritage settlements of Tong and Fulneck – unique communities that offer substantial added value to both Leeds and Bradford underlines all this.

Gordon Dey – Representee  
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