

THE TONG AND FULNECK VALLEY ASSOCIATION

Secretary: John Finnigan

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Elisa Atkinson
Housing Regeneration Project Co-ordinator
City of Bradford M.D.C
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4 November 2011

Dear M/s Atkinson,

Holme Wood and Tong Neighbourhood Development Plan (the "NDP")

I am asked by the Board of Trustees of the Tong and Fulneck Valley Association, who met on 28th October, to write to you in connection with the consultation exercise currently in force relation to the NDP.

This Association is a charitable members association whose main objects are:
"to promote the conservation, protection, maintenance and enhancement of the Tong and Fulneck Valley and its environment: and in furtherance of such charitable objects to consider, advise and comment on and/or to object to or make proposals for changes to or developments within the Tong and Fulneck Valley where such changes or developments may affect the quality of its landscape and/or ecosystems, its access to the public or the quality of lives of those inhabitants of the Tong and Fulneck Valley or the Adjoining Communities.."

Our membership is in excess of 300, a substantial proportion of whom live in the BD4 postcode area, and include walkers, horse riders and those with interest in the local countryside and architectural heritage of the area.

Firstly our Board have considered the consultation documents including the Report on the Draft Plan released on your web site immediately prior to the drop in events in Holme Wood and Tong Street. We welcome the considerable work which has gone into the production of the NDP and the vision and objectives set out in the Executive Summary. Many of our members live within the Holme Wood regeneration area and wish to see early progress being made to realise regeneration opportunities within the Estate. As an Association therefore we wish to add our support to the Option set out in Paragraph 7.7 of the NDP ("Option 1").

We are however sorry that the only other option offered for consultation is that described at paragraph 7.13 of the NDP ("Option 2") as this proposes a major release of green belt land falling wholly within the Tong and Fulneck Valley (as defined in our constitution) which we believe will adversely affect the quality of landscape and ecosystems and access to a large area of countryside which at present provides a valuable recreational access to residents and visitors alike.

We are clear that the inclusion of an "urban extension" (as defined in paragraph 3.2.36 of the Local Development Framework for Bradford Core Strategy Further Engagement Plan currently appearing on your website) at Holme Wood, coupled with the proposed revisions to National Planning Guidelines, would open the Tong and Fulneck Valley to serious environmental threat, to the detriment of the local community and would result in the Council being unable to control speculative "cherry picking" of development sites within the area.

We would have preferred your Council to have offered another specific option for less radical, controlled and limited housing development in areas abutting the estate to supplement the creditable proposals contained in Option 1, and our Association would not be unreasonable were such an alternative option to be set out.

Our specific reasons for not supporting Option 2 are as follows:

1. Tong Village is a conservation area containing two grade I listed buildings and other grade II listed buildings and structures. Housing development on Site 3 within Option 2 would destroy the open rural gateway to Tong Village which is a feature of its charm. We are sorry that the NDP, despite being described as relating to "Holme Wood and Tong" says nothing of significance about the value of Tong Village as a conservation area, nor about its importance as a centre for walkers and others using the paths and bridle ways of the Tong and Fulneck Valley, nor the historical value to Bradford which has followed from the preservation of the Tong and Fulneck Valley pretty well unspoilt and in its present form from the 18th Century to date.
2. The NDP also shows no evidence of consultation with, or consideration of the effects of major green belt release on, the neighbouring authorities of Leeds and Kirklees. In particular the community of Fulneck (many residents of which are among our membership) has a significant interest in the continuing integrity of the Tong and Fulneck Valley. We would like to see the NDP acknowledge the West Leeds Country Park initiative and indicate an intention, for the benefit of the residents of Holme Wood and Tong, of providing similar levels of encouragement and assistance to residents to use and maintain the footpaths and bridle ways within the existing green belt land.
3. The building of 2100 homes on Sites 2 and 3 would result in a massive strain being placed on the roads, particularly the A650 and the junction with the Drighlington Bypass at Westgate Hill. This would inevitably lead to Tong Lane and New Lane being used even more as "rat-runs" for access into Leeds, to the substantial detriment of Tong Village, and with the risks to pedestrian safety. The structure of properties

fronting Tong Lane is already subject to vibration from the volume of traffic and would be under greater stress if the development proceeds.

4. Site 3 is placed at the very head of Cockersdale, and housing at that point would blight the landscape quality of that valley. It is also at present the site of Lane End Farm, one of the best kept and most innovative farms in the district, which raises its own quality breeds of sheep and cattle for sale at the newly opened farm shop (itself an employment provider) and which has recently opened its doors to an animal menagerie with pigs, llamas, donkeys, ducks and hens as well as sheep and cattle forming an education and attraction for young children. This is the sort of farming that we should be encouraging, not building over.
5. Site 2 runs down to Raikes Lane and proposes an access road from Westgate Hill to Raikes Lane. It engulfs the grade I listed Rycroft and the Grade II listed Rycroft Farm. It is easy to see that if housing were permitted into the Tong and Fulneck Valley at that point, the next step would be for developers to seek to take housing through to Site 1, and indeed if developers made application for planning consent in that central area, which is key to the preservation of the integrity of the Tong Valley, it would be difficult for the Council to resist if it had indicated, either in the NDP or in the LDF, a willingness to release adjoining land from the green belt..
6. The NDP makes no provision for the traffic which would be generated by such access road, in the form of road improvements from the Raikes Lane/Holme Lane junction to the upgraded "Village Centre" in Broadstone Way. Unless there are such improvements, the "access road" would be ineffective as a means of integrating Sites 2 and 3 with the Holme Wood Community, and if there were such a connection it would have an adverse effect on that part of the regeneration area..
7. Furthermore the line of the road shown through Site 2 on the Option 2 Plan is disingenuous, because it is at odds with the LDF which refers at paragraph 4.1 to an "East Bradford Link Road". This is shown on the accompanying map as passing right through Sites 2 and 3 across Raikes Lane and to an unspecified link point in Tyersal. If the Council's real road link intentions are as set out in the LDF and not the NDP, then this constitutes an even greater threat to the rural aspect and peace of Tong and Fulneck Valley, as such a road would immediately be used to by-pass Tong Street and bring heavy volumes of traffic into the Tong landscape.
8. Sites 2 and 3 would result in a stand-alone estate with no community connection with Holme Wood. The developments would need to provide for a high proportion of car usage and would be unsustainable unless given their own infrastructure independent of Holme Wood. The financial arguments in favour of a substantial development outside the estate to support infrastructure within the estate are unfounded and not backed with any credible evidence. What is known is that your Council's officers themselves acknowledge at paragraph 7.17 of the NDP in relation to s 106 contributions that *"developer contributions may also be absorbed by requirements for on/offsite infrastructure arising from the development of the site"*.

Furthermore it is our understanding that local authorities in West and South Yorkshire are currently experiencing substantial losses arising from unpaid s 106 contributions. We also understand that there will be no guarantee that New Home Bonus payments will be fed back into benefit for Holme Wood, or to compensate for the substantial damage to the Tong Valley that would result from these proposals.

9. Paragraph 3.2.27 of the Core Strategy Further Engagement Draft states that *"national policy does allow for the deletion of green belt land in exceptional circumstances where all other realistic development options have been exhausted"*. In imposing a 2700 home development on Tong constituting 10% of the regional city of Bradford total to 2028, 2100 of which are proposed for green belt deletion, we do not believe that all other realistic development options have been exhausted within the regional city or even within south Bradford. We were encouraged by Cllr Greenwood's statement at the Executive meeting on 14th October that no part of the LDF proposals were not open to change, which clearly indicates that Council does have alternatives to making this major green belt deletion.

For these reasons we would ask the Council to proceed as quickly as possible in the adoption of the NDP based upon Option 1 and with the inclusion of an acknowledgement and assessment of the value of Tong Village and a clear statement of intention to preserve the green belt land comprising the Tong and Fulneck Valley and the head of Cockersdale.

Yours faithfully,

John Finnigan
Secretary
Tong and Fulneck Valley Association