

Local Development Framework for Bradford Core Strategy Further issues and Options for Consultation

Skeleton points

1. Position

- a. The comments below refer to the following documents, namely:
 - i. Undated Summary Document headed “Local Development Framework for Bradford “Your District in 2026” (the “Summary Document”)
 - ii. “Core Strategy – Further Issues and Options for Consultation – Spatial Vision and Strategy” - January 2008 (the Spatial Vision and Strategy Document”)
 - iii. “Core Strategy – Further Issues and Options for Consultation – Initial Sustainability Appraisal” - January 2008 (the “Initial Sustainability Appraisal”)
 - iv. “Core Strategy – Further Issues and Options for Consultation – Settlement Study” - January 2008 (the “Settlement Study”)
 - v. “Joint Housing Strategy for Bradford 2008-2020” presented to Council on 2 December 2008 (in the “JHS”)
 - vi. The “Landscape Character Supplementary Planning Document Volume 7 Tong Character Area – August 2008 (the “Tong Landscape Character SPD”)
 - vii. The Replacement Unitary Development Plan – October 2005 (the “RUDP”)
 - viii. Leeds City Region New Growth Point Initiative – report of Chief Officer - 4 August 2008 “Strategic Housing Issues” (the “NGP Report”)
 - ix. [Planning Policy Statement 7: Sustainable Development in Rural Areas](#) – August 2004 (“PPS7”)
- b. Our overall position is to oppose Options 3 & 4 set out in Part 4 of the “Spatial Vision and Strategy Document (individually referred to as “Option 3” and “Option 4” and together referred to as “Options 3 & 4”) because of
 - i. the extent of the proposed release of Green Belt land which would compromise the effectiveness of the remaining Green Belt land (including that adjacent land within the Leeds MDC boundary) and have an adverse effect upon the landscape character and amenity value of the Tong Valley (as defined at paragraph 3 a. below);
 - ii. the material levels of transport infrastructure required to support a large scale development, and the absence of meaningful proposals.
 - iii. uncertainty as to the effects of a north/south link road on the community;
 - iv. the adverse environmental effects of increased traffic through the Tong Conservation Area;
 - v. the need to create and maintain a sustainable community in South Bradford and the adverse social impact of a new large scale housing estate on the existing community;

- vi. The adverse effect upon the Bradford economy which would result from the creation of substantial Leeds-centric commuter housing development in South Bradford or an attempt to bring Holme Wood within a “Leeds/Bradford Corridor”.
- c. We recognise that the Planning Authority’s hands are tied by government requirements to find space for pre-determined numbers of additional houses, but feel that the methodology adopted in Options 3 & 4 is not appropriate to achieve this requirement. We regard Options 1 & 2 as offering a better solution, and emphasise that in every case priority should be given to making use of Brownfield land, both because this is more likely to support regeneration and because it is undesirable as a matter of principle to offer large scale Green Belt releases as a strategic plank in the development options.

2. Procedural

We have some initial procedural concerns as to the consultation process:

- a. Why were consultation documents not made available in the Library in Holme Wood, as this area is so intimately affected by the proposals? (The nearest place to Holme Wood where hard copy documents were stated in the Summary Document to be available was at the Planning Office at Jacob’s Well, or the immediately adjacent Bradford Central Library.)
- b. Why were insufficient copies of the Summary document printed to enable local distribution, and why were requests for further copies to enable distribution within affected communities not promptly followed up?
- c. The Summary document contains no indication of a timeframe within which comments are to be given, and without easy access to the hard-copy documents or the web a large number of people, particularly in the Holme Wood estate would be left without a clear view of when to respond.

3. Omissions and updates

- a. The document “Settlement Study” excludes from the settlements reviewed those areas not shown coloured in the Appendix 3 maps. The area coloured pink, described as “Bradford South East” excludes the whole of the Green Belt area comprising the Tong Valley (which in this document means the area bounded on the West by Ned Lane, Home Wood Lane, the Kirkdale Estate, Denbrook Avenue and the A650, on the South East by Tong Lane, on the East by the boundary with Leeds MDC at Roker Lane and on the North by the boundary with Leeds MDC at Pudsey/Tyersal).
- b. Consequently no reference is made at paragraphs 6.29 and 6.32 to the settlement at Tong Village (which presumably does not rank sufficiently highly in the Settlement Hierarchy definition at Schedule 5), nor of the Tong Conservation Area. Whilst size may be a reason for the exclusion of reference to Tong Village as a settlement, it is difficult to understand why reference is not made anywhere in the document to the Tong Conservation Area in view of its intimate relationship with, and amenity value to, the Bradford South East Area and its relationship with the proposed Green Belt release..

- c. Members of the public reading the Settlement Study may therefore be drawn to the conclusion that the absence of any such references, means that the Tong Village Conservation Area, is not intended to be “affected” by any of the options, and indeed that the Tong Valley is excluded from the proposed location of development. This is particularly the case as the Summary Document states that the Settlement Study “forms an evidence base to support the development of a hierarchy for the location of development at the next stage of the Plan preparation” and contains no evidence at all in respect of the Tong Valley.
- d. However planning officials responding to enquiries have made it clear that the Tong Valley is indeed proposed to be one of the major locations for development. The reference in Options 3 & 4 to “*an extensive Green Belt release to the east of Bradford at Holmewood*” contemplates material levels of housing development in the Tong Valley. Planners said that they would outline the contemplated development areas at a consultation exhibition organised by Planning Aid held in Holme Wood as late as 27 November 2008.
- e. At that meeting a possible development area was shaded which included the whole of the western half of the Tong Valley bounded in the East by a line from Tong Lane (south of the Tong Garden Centre), the western boundary of Park Wood, and the line of Tong Beck as far as Black Carr Woods, and to the West by the Holme Wood Estate / Denbrook Estate / A650 (that area being referred to in this document as the “Tong Valley Development Area”). In response to questions a planning official stated that the Tong Valley Development Area could accommodate up to 7500 houses at greatest levels of density, but that a number of 5000 houses was a more reasonable maximum estimate.
- f. Additionally planners indicated at the exhibition the line of a possible north/south road from the end of the Drighlington by-pass on the A650 to an unspecified northern point (possibly Tyersal Lane) intersecting the proposed housing development (in this document referred to as the “North/South Road”).
- g. Both (or either of) the optional housing development or the North/South Road would have material effects upon the settlement at Holme Wood, and, even though not contiguous with the Tong Conservation Area, the housing development would have a material effect on traffic in the Tong Conservation Area (see comments on “Transport infrastructure” at paragraph 5 below).
- h. None of the three consultation documents contains, in express terms, the information referred to at paragraphs d, e and f above.
- i. Nor does the Settlement Study contain any express settlement analysis of the Holme Wood Estate, except as part of the analysis of Bradford South East where, in particular, the comments on the transport infrastructure are inappropriate to Holme Wood. In the light of the magnitude of the effects of Options 3 & 4 on the communities living in the Holme Wood Estate and adjacent settlements it is unfortunate that the Settlement Study does not attempt a separate evidential analysis giving a more complete view of the nature of those settlements, to inform the consultation exercise.
- j. It is equally noteworthy that the settlement analysis does not give any definition of the “*Esholt*” area which is described in Options 3 & 4 as being a potential growth point. Nor does it provide any settlement analysis of “*Esholt*”. It is believed (but difficult to determine from an examination of the consultation

- documents) that “*Esholt*” is a misnomer for the Apperley Bridge area. As with Holme Wood Estate, “*Esholt*” would have benefited from a separate profile from that given to the Bradford North urban area in which it is located.
- k. The absence of evidential profiles applicable to the Holme Wood and “*Esholt*” areas makes meaningful consultation on the options for significant growth points in those areas difficult. Those compiling the Settlement Study made the point that the Canal Road Corridor (pop 1171) merited separation from the Bradford Urban Area profiles as it was identified as an area “*for considerable regeneration and growth...*” and the same argument should have been applied to Holme Wood and “*Esholt*”.
 - l. The Settlement Survey also contains no separate analysis of the Ravenscliffe and Laisterdyke communities. However each of those communities, together with Holme Wood, is identified in the JHS”) as being areas with “*significant growth opportunities*” where “*...upward of 6000 new homes could be provided...*”
 - m. The JHS also refers to the provision of five Housing Development Frameworks, being “The Canal Road Corridor”, Manningham, The Leeds/Bradford Corridor, the Airedale Corridor and the City Centre. It is clear that the JHS regards the Leeds/Bradford Corridor as a significant location for housing development in the period 2008-2020, having as an aim to “*boost developer confidence to build between Leeds & Bradford*”, and yet none of the consultation documents makes any reference to the Leeds/Bradford Corridor as forming any part of the strategic consideration for consultation, nor is there evidence of support from Leeds MDC for extensive building in Green Belt land between Leeds and Bradford, indeed indications at political level are that Leeds does not support material Green Belt incursions between the cities.
 - n. Paragraph 1.23 of the “Spatial Vision and Strategy” states that “*As will be seen in part four of this document, spatial options 3 & 4 consider the NGP initiative in the proposals for locating development across the District.*” That statement is unsupported by any reference in the text of part four to the NGP other than at 4.25 in relation to Option 3 that the option is “*in line with the growth point initiative being promoted by the Leeds City Region*”, without explanation as to how it lines up or indeed what the initiative is. Table 1 claims as strength of Option 3 that “*This option attempts to link the RSS Core Approach with the emerging Leeds City Region Growth Point Initiative*”, but no such claim is raised in respect of Option 4. The significant additional housing growth points in Options 3 & 4 are in Holme Wood and Esholt. These are the areas which the JHS describes as being within the “Leeds/Bradford Corridor”. However the NGP report refers only the “Bradford/ShIPLEY Canal Road Corridor” as being a new growth area within its terms, and all 4 Options pinpoint growth in the Canal Road Corridor. Furthermore the NGP Report indicates that Bradford is not one of the authorities who can bid for further funding at this point (paragraph 4.3 of the NGP Report). Those authorities whose bids were successful had committed to growth additional to the RSS growth. Presumably therefore the NGP benefits of Option 3 (whatever they were) can now be discounted.
 - o. The JHS was obviously published well after the three consultation documents, but within the consultation period, and the absence of reconciliation between the vision clearly stated in the JHS for a joint approach between authorities for the

development of housing in the Leeds/Bradford Corridor which sees Holme Wood as forming part of that corridor, and the approach set out in Options 3 & 4 which does not attempt to place Holme Wood development in that context but as a stand alone location needs to be explained. Without such reconciliation it appears that there is a mismatch between the current planning vision and the current housing vision, which could compromise consultation on the three Core Strategy documents.

- p. A further document which has been published after the three Core Strategy consultation documents is Tong Landscape Character SPD. This was not published until August 2008 and is therefore not referred to in the three consultation documents. As a SPD this should be taken into account as a material consideration in relation to any current development proposals. The Tong Landscape Character SPD concludes at paragraph 5.2 that of all the Landscape Character areas in the District, the Tong Valley is the landscape least appropriate for further development. As this conclusion is fundamental to and inconsistent with the viability of Options 3 & 4 one can only think that the Tong Landscape Character SPD should have been produced before the Options were formulated.

4. Commons Select Committee on Environmental Audit 12th Report

- a. It is appreciated that this Report is merely a House of Commons Select Committee Report which is not encompassed in government guidance to planners. However it does represent a viewpoint which is widely supported within the affected communities in and around the Tong Valley and we place on record those challenges which seem particularly apposite to Options 3 & 4 in Part 4 of the "Spatial Vision and Strategy".
- b. At paragraph 8 the Report recommends that the government seeks the advice of the Sustainable Development Commission on the environmental limits of continuous house building.
- c. At paragraph 12 it recommends that the government urgently reviews the assumptions on which its 3m house target by 2020 is based on the basis of latest economic growth projections, fundamental changes in mortgage market and falling house prices.
- d. At paragraph 18 it recommends that the government suspends the implementation of its regional spatial strategies until it has carried out an environmental appraisal of its house building targets.
- e. At paragraph 62 it recommends that the government ensures that developers do not gain easy access to Green Belt land in preference to brownfield sites by reintroducing a clear sequential test in favour of brownfield sites.
- f. At paragraph 67 it recommends that the government "*emphasise the importance of protecting and where possible extending green belt boundaries.*"
- g. We particularly regard these recommendations as pointing away from any large releases of Green Belt land, firstly because housing numbers are uncertain and unsupported by appropriate evidence, secondly because the current recession will inevitably impact upon the willingness of developers to engage in large scale new estate development and this is unlikely to resolve itself for several years

and thirdly because large scale Green Belt release is an irreversible process, whereas smaller releases (as and when required) provide flexibility while protecting sensitive landscape sites.

5. Transport infrastructure

- a. Transport infrastructure is a key to the attraction of housing developers to new large scale development.
- b. The Settlement Study deals at paragraphs 6.29 – 6.34 with Bradford South East which includes Holme Wood, but not as noted above the Tong Valley or Tong Village.
- c. At paragraph 6.31 it is stated in relation to road access that *“the transport infrastructure is an important vital asset to this area of Bradford: the M606 provides the gateway to the city from other destinations such as Leeds, and Manchester. There is a good level of public transport facilities to serve the area; the completed Manchester Road guided bus route allows for speed and efficiency, and the West Yorkshire Local transport Plan (WYLTP) 2 proposes another route to be located along the A 650 Tong Street”*.
- d. The reality is that the M606 terminates at the junction with the A6036/A6177 at Rooley Lane and has not been carried through into the city centre or to link with the trunk road system of the Aire Valley. In consequence substantial volumes of heavy goods traffic use the A650 Tong Street as their access to the city as this road does link into the A6037 along the Canal Road Corridor. The M606 undoubtedly provides the arterial link to Manchester and to the Kirklees District. It is very doubtful if it is or ever could be seen as a principal gateway into Leeds, as the M62 between the junctions with the M606 and the M621 is, despite recent improvements including a “2 person” lane on the hard shoulder, virtually gridlocked during long rush hour periods.
- e. The main road corridor between Leeds and Bradford used by local traffic and a substantial proportion of goods traffic accessing the Canal Road area is the A647 which joins the Leeds District at Galloway Lane and proceeds into Leeds via the Leeds Ring Road and the Stanningley Bye-pass.
- f. The A650 Tong Street is a single carriageway road passing through a heavily urbanised area with houses, shops, industrial and warehouse use intermixed. It is the site of a recently completed Health Centre serving Holme Wood. It also serves as the only access to the newly constructed Tong High School at Westgate Hill. It is gridlocked for large period of the day. It provides inadequate support to the existing Holme Wood housing and would be quite incapable of serving additional housing development without major upgrade. In its present state the introduction of a guided bus lane would exacerbate the problems.
- g. The M606 and the Manchester Road bus services provide no effective road benefit to the Holme Wood area, and reference to them in the context of housing growth in Holme Wood is misleading.
- h. The M606 does provided an attractive link to encourage light industrial and warehousing and distribution to the Bradford South area, and there is some prospect of the development of the Rooley Lane area as an employment growth area, but the nature of the commercial use likely to be attracted to the area is unlikely to justify in itself a material expansion of housing numbers in Holme

- Wood., which already has large numbers of un-jobbed residents to whom employment expansion prospects should first be directed.
- i. Because of the inadequacy of the arterial road links from the Bradford South area to Leeds there is a tendency for traffic, including heavy goods traffic to seek alternative routes into Leeds. This has led to increasing volumes of traffic using Tong Lane as a link down the Tong Valley and through the Tong Conservation Area and Ton Village into Leeds via the Leeds Ring Road at Farnley. This is currently the source of much concern. Although traffic calming measures have been introduced which initially reduced speed, traffic volume on Tong Lane has increased and the absence of policing has resulted in speeds increasing. Any expansion of housing development into the Tong Valley, particularly at the Westgate Hill area would have a devastating effect on the flow of traffic through Tong Village without positive action to restrict use, and any such restriction might serve to move the same problem into the Leeds District by increasing traffic flow on the A58 from Drighlington.
 - j. It is feared that the proposed housing development in the Tong Valley would become part of the strategy described in the JHS as the Leeds/Bradford Corridor with proposals to link the development growth directly into Leeds by the construction of a road link along the Tong Valley to join the Leeds Ring Road at Farnley. That would be regarded as totally unacceptable, and would destroy what part of the Tong Valley might escape the housing development.
 - k. Option 4 states in Table 1 that *“Development will be based on existing transport infrastructure”*. For the reasons given above we do not believe that any housing development east of Holme Wood can be undertaken without radical improvements to the existing transport infrastructure and accordingly could not support that Option.
 - l. Option 3 is unspecific as to how transport infrastructure would be affected, but we assume that the North/South Road is one of the options under consideration.
 - m. If the North/South Road was intended as an arterial link road dividing the existing Holme Wood Estate from the new housing development that would have serious implications for the creation of an expanded but integrated community. We can see the reasons why an arterial link might be considered, but fear that rather than link into Tyersal Lane as indicated on the plan displayed at the consultation meeting on 27 November, there may be a temptation to seek to follow the route of the “Pudsey/Dishworth Motorway” as proposed in the 1970s and link into the Leeds Ring Road at Dawson’s Corner. Such a link would result in heavy volumes of traffic being filtered through Holme Wood to link with the M62 at Junction 27.
 - n. If on the other hand it is seen as a link road to provide better estate access then further major infrastructure would need to be undertaken to alleviate traffic flow both along the A650 and through Tong Village. This would almost certainly be unsuccessful without improvements to the link from the present end of the M606 and the Canal Road Corridor.
 - o. If there is an ambition to create a Leeds/Bradford Corridor we do not think that it is suitable to regard Holme Wood as being part of that corridor. A link down the Aire Valley through Ravenscliffe/Apperley Bridge, or along the A 647 would be more realistic, but in each of those cases our concern for the preservation of

Green Belt would apply, and our view is that the Leeds/Bradford Corridor per se should not be part of the Spatial Vision for Bradford.

- p. Paragraph 6.31 of the Settlement Survey contemplates provision of a new railway station at Low Moor. There may be good reasons for this in terms of benefit to other parts of Bradford South east, but it would have no benefit for housing development at Holme Wood.
- q. Paragraph 6.31 of the Settlement Survey contemplates provision of a new railway station at Laisterdyke. This would no doubt be beneficial to housing expansion in the Laisterdyke area as contemplated by the JHS, as it would provide rapid access to Leeds and beyond. It is unlikely to be used for access to Bradford City Centre, nor without a cross City Centre rail link, for access to the Canal Road Corridor/Shipley/Bingley. Most particularly it is too far from Holme Wood to be of any benefit to a housing development in the Tong Valley. We would however encourage the expansion of material Park/Ride facilities based on a Laisterdyke station, as Park/Ride at New Pudsey is generally unavailable to daytime commuters as the car park there is used as an overflow for the Green Flag offices at Dawson's Corner.
- r. Quite independently of any large scale housing development at Holme Wood we would encourage investment in transport infrastructure improvements for the Tong Street area.

6. Tong Valley Amenity

- a. Planning Policy Guidance 2 states that:
“Once Green Belts have been defined, the use of land in them has a positive role to play in fulfilling the following objectives:
 - *to provide opportunities for access to the open countryside for the urban population;*
 - *to provide opportunities for outdoor sport and outdoor recreation near urban areas;*
 - *to retain attractive landscapes, and enhance landscapes, near to where people live;*
 - *to improve damaged and derelict land around towns;*
 - *to secure nature conservation interest*
 - *to retain land in agricultural, forestry and related uses”*
- b. The Tong Valley functions as part of the Green Belt for the first three such purposes. However such function would be destroyed by a large scale release of the Tong Development Area, because:
 - the remaining part of the Green Belt forming the eastern part of the Tong Valley and the Cockersdale Valley, the vast part of which lies within the Leeds MDC boundary, would provide severely limited access to the countryside, in a part of the metropolis where access to other areas of countryside of such quality is limited;
 - recreational use, particularly walking and horse riding, would be reduced and made substantially less attractive because of the loss of footpath and bridleway interconnectivity, and the adverse effect on stabling for horses within the area; and

- The overall effect would be to reduce materially the quality of the remaining countryside.
- c. Together with the adjacent Cockersdale Valley to the south, the Tong Valley was until recently part of the “Tong–Cockersdale Country Park” with joint funding between Leeds and Bradford for maintenance and improvement of footpaths and bridle paths. The area is extensively used by walkers, and by horse riders. The pasture-land around the Tong Valley is the site of riding schools, and recent improvements to the bridle paths, gateways and stiles has resulted in diminished incursions by motor bikes and 4WDs and substantially increased use by horse riders, very many of them young people living in the adjacent urban areas.
 - d. Encroachment into this section of Green Belt by either authority would have adverse effects on the other. At present the Tong and Cockersdale Valleys contain a network of interlinked public pathways and bridle paths from Farnley in the west up the Cockersdale Valley through Sykes Wood, across from Drighlington to Tong (where three paths cross the valley), down the Tong Valley to Fulneck and up the Tong Valley through Park Woods to Black Carr Woods and Tyersal, all without crossing any road other than Tong Lane. This interconnectivity would be destroyed by housing development in the Tong Development Area.
 - e. The Tong Valley, in our submission, separating as it does the historic Moravian settlement of Fulneck, dominating the northern side of the Tong Valley (but within the boundary of Leeds MDC) from the Doomsday village of Tong, located in the Tong Conservation Area on the south of the Tong Valley, should be regarded as an extension of those two historic settlements, the view of either of which would be irrevocably despoiled by housing development in the Tong Development Area. This is undoubtedly the key part of the attraction of the Tong Valley as a whole.
 - f. PPS7 states that: *“While the policies in PPG2 continue to apply in green belts, local planning authorities should ensure that planning policies in LDDs address the particular land use issues and opportunities to be found in the countryside around all urban areas, recognising its importance to those who live or work there, and also in providing the nearest and most accessible countryside to urban residents. Planning authorities should aim to secure environmental improvements and maximise a range of beneficial uses of this land, whilst reducing potential conflicts between neighbouring land uses. This should include improvement of public access (eg through support for country parks and community forests) and facilitating the provision of appropriate sport and recreation facilities.”*
 - g. The area character is, despite its proximity to the existing Holme Wood Estate to the west and the urban settlements of Fulneck and Pudsey to the north, predominately rural. Its preservation is the result of a feudal anachronism in that succeeding generations of the Tempest family insisted on the maintenance of the estate’s integrity despite opportunities to develop parts, and the opportunity afforded by this accident of history should not be missed. A very small amount of investment could result in the revival of the Tong-Cockersdale Country Park concept and provide South Bradford and West Leeds with a

significant and valuable leisure resource with the Tong Conservation Area at its heart.

7. Social Impacts

- a. The Initial Sustainability Appraisal paragraph 3.10 identifies Option 2 as providing residents with the widest choice of potential locations for future housing and opportunity for flexibility in housing type and affordability.
- b. Paragraph 3.16 of the same document recognises that focusing development at growth points puts greater pressure on infrastructure, and that principal towns provide access to a wider range of existing services, employment and transport links than “*Esholt*” or Holme Wood are likely to offer.
- c. Paragraph 3.17 recognises that a significant influx of people into a few communities could put pressure on social cohesion, particularly in deprived neighbourhoods. The same comment is made at paragraph 3.22 in respect of Option 4.
- d. We believe that far more evidence is needed of the effect on the social cohesion of Holme Wood of the addition of up 5000-7500 new houses to the estate, tripling it in size. Bradford MDC will be aware that without the dedication of a substantial body of publicly funded officials and community volunteers the problems of Holme Wood, which are and have been manifold, would be even greater. Holme Wood itself is still in need of further infrastructure and services to meet the desired objectives of social sustainability, and there is a lack of confidence, based on evidence of past performance, that whatever optimistic promises of infrastructure and services are made in support of a large scale development, the actuality will be that the infrastructure and service support will not be adequate to support the social need.
- e. If the intention is to build commuter houses to support a medium to upper income Leeds facing population heavily dependent on the car, the result would be to create a two tier community, possibly physically divided by the North/South Road, but certainly socially divided from the existing Holme Wood community, with little prospect of integration.
- f. If the intention, on the other hand, is to build substantial numbers of affordable homes and rented social housing to meet the aspirations of a growing existing inner-city population, the commitment to infrastructure to avoid the social pressures which would otherwise result will be massive, and far beyond anything offered in the Spatial Vision and Strategy Document.

8. Economic Growth in Bradford

- a. Options 1& 2 provide a better balance of housing mix and provide houses where they are most likely to be needed.
- b. There is clearly some case for further house building within the Holme Wood Estate and for moderate in-fill development in the Westgate Hill area (bearing in mind that part of the Yorkshire Martyrs school site will be vacated); and Options 1 & 2 might encompass such development. But we view the objectives of Options 3 & 4 as being more radical and harmful to the community.

- c. Our view is that the skewing of housing development away from the Aire and Wharfe valleys, towards a heavier concentration in South Bradford will be bad for the Sub-regional economy
- d. The economic downturn, which has occurred since the publication of the Core Strategy documents, has had a devastating effect on the financial services sector which is a major employer in both Bradford and neighbouring Calderdale. The acquisition of the retail part of Bradford & Bingley Bank by Banco Santander and the nationalisation of the remainder may result in job losses or in relocation of activities. It is unlikely that expansion at Yorkshire Building Society in Rooley Lane, which appears to remain viable, will compensate, whereas similar threats of restructuring and relocation of jobs may result in employees of HBOS presently located in Halifax seeking to commute to Bradford to mop up any new jobs in the financial services sector. Employment prospects in that sector (and the secondary activities which it supports) are therefore unlikely to require housing growth to be directed to South Bradford. However particular help will be needed for the Bingley and Shipley area and Option 2 seems the best proposal to give that support.
- e. There is some prospect for warehousing and distribution growth in the Rooley Lane/ M606 area, but without clearer guidance than that contained in the consultation documents it is not clear how many jobs would be created, nor as to what other industrial or commercial growth offerings are in prospect. The Holme Wood Estate contains a relatively high proportion of un-jobbed and it is to be hoped that employment growth in the area would be directed first to them and not to job seekers from the proposed new housing development.
- f. Clearly the economic downturn will result in pressure being placed on existing jobs over at least the next two years, before any prospect can be entertained of new jobs, and housing development plans which do not take into account the knock-on effects of this, and of reduced public spending budgets, which will affect growth for at least the next five years, will not gain the support of developers. There is no evidence that South Bradford is likely to become an employment “hot-spot” for the District.
- g. The JHS admits that Bradford has *“higher than average numbers of people in low skilled occupations”*, but has a vision that by 2020 a *“shift in the economic climate [will create] conditions which lead Bradford to becoming a high skill, high wage economy”*. The housing strategy is based upon that vision, but none of the consultation documents give any indication of how the underperforming skill-base of Bradford is to be turned around to produce the anticipated high skill outcome.
- h. The most likely result of diverting housing development from the heart of the Bradford District to its southern fringes would be to encourage settlement by a largely commuter orientated and car dependent population looking to employment opportunities in Leeds or possibly Kirklees rather than contributing to the Bradford economy. Again this is a good reason for emphasising the strength of Options 1 & 2 over Options 3 or 4.
- i. The Initial Sustainability Appraisal seems to recognise the weakness of the economic case for Option 3 when it says at paragraph 3.16 *“This Option could reduce the overall investment attracted to the district.”* and *“It underplays the potential of Airedale to attract people and high quality employment into the*

district". In respect of Option 4 it seems to accept that the emphasis on connectivity with Leeds will offer *"the opportunity for residents to benefit from a range of job opportunities there"*, which seems to amount to a resigned acceptance that under that Option Bradford will become a dormitory suburb of Leeds.

- j. Little is said in the consultation papers about the relationship between Leeds and Bradford. It needs to be emphasised that Leeds current policy is that it seeks to protect the Green Belt between the cities. Options 3 & 4 therefore would be unsupported by Leeds MDC, and accordingly transport infrastructure corridors would be moulded around the MDC boundaries in an arbitrary and ineffective way.
- k. There is a risk that the proposed North/South Road would develop into an arterial route towards the Leeds Ring Road, rather than provide infrastructure support to housing development in Home Wood.
- l. In conclusion, if Bradford were to place its housing development emphasis on South Bradford, the inevitable consequence would be that the area would either become economically unsustainable or it would be absorbed into the Leeds dormitory belt and would serve to grow the Leeds economy at the expense of that of Bradford, particularly the Aire Valley.