**REPRESENTATION ON BEHALF OF LAND OWNERS IN SHIPLEY AND SITE DF3.**

1. INTRODUCTION

1.1 Unfortunately, I am unable to attend the Inquiry/Hearing because of holiday commitments but would like to make a few comments on the proposals in the following documents that aim to deliver the identified objectives.

1.2 I have had experience in both the private sector and the public sector and most recently was responsible for producing an AAP for the Lower Aire Valley, which covered an area of some 1000ha and aimed to deliver, amongst other things, some 12,000 homes and 10,000 jobs – a £3billion inward investment project. I mention this to emphasise I have had some experience in producing plans that will deliver major regeneration. I am afraid that lots of well written prose about ambitions and objectives is all well and good but doesn’t go far enough in the delivery of those objectives. Real policies are required which are robust and sustainable and obviously compliant with the Core Strategy etc.

1.3 We have consulted on our site with the Council and were advised that our proposals were compliant with the emerging plan and after then producing: a Highways Transport Strategy, a Heritage Statement, a surface water drainage strategy and a Draft S106; we are then advised that they would like to see the old station retained. This old building is in very poor condition and has been the subject of all sorts of low key uses, mainly storage and in the emerging Plan we have seen no justification for its retention. Yes it has been identified as being of “local interest” but it has no official protection. It is obviously not a listed building nor is it within the setting of a listed building, nor would its development affect in any way the world heritage site. What its retention will do is inhibit the regeneration of this depressed area because it’s in such poor condition it will cost much more than normal “new build” costs to restore and convert. It’s much more likely therefore that the building will be left as economically unviable and all it will do is act as a blot on the local landscape with the likelyhood that the development of the surrounding area will not come forward either. In order to bring about “change” and effective regeneration one has to be dynamic and the policies and their interpretation need to reflect that need. If buildings of only local interest have to go then so be it – what’s more important – the successful regeneration of this key area or the former station building, which exhibits no real value.

1.4 Conservation is not about retaining everything in a status quo, it is about retaining and enhancing the real quality and potential of the historic fabric and its culture and not retaining buildings because they are old and once were of some local importance.

2. Shipley and Canal Road Corridor Area Action Plan Publication Draft

The Vision for Shipley and Canal Road Corridor AAP

2.1 I will now add a few comments in the following text to outline my concerns and those of my client (in italics). The Shipley and Canal Road Corridor has truly become an area of extensive transformational change, which is regarded as an exemplar Urban Eco Settlement between Bradford city centre and Shipley. The Corridor has borne witness to the delivery of over 3100 new homes supported by new businesses, retail, leisure and community facilities. This has created a series of vibrant new sustainable neighbourhoods that provide a range of high quality homes and local employment opportunities for residents connected by the Linear Park, revitalised Bradford Beck and Canal Road Greenway running from Bradford city centre to Shipley. This multi functional green corridor has helped enhance biodiversity and ecological networks and provides a high quality setting for walking, cycling, sport and recreation along the Corridor. Shipley has strengthened its role as an important town centre, through the expansion of its retail, leisure, office and housing market offer and much improved links to Saltaire, Shipley Station and the Leeds and Liverpool Canal. This redevelopment has improved the area as a key gateway to the World Heritage Site of Saltaire and has been managed in a way which has enhanced Shipley, the World Heritage Site and other heritage and environmental assets in its vicinity, creating a better offer for workers, visitors and residents alike. *I would have to add that this is work in progress and this text suggests that much of the work and transformation has been done and completed, which is far from true.*

The Corridor has been reinforced as a strategic transport route, supported by improvements to highway infrastructure along Canal Road, the Shipley Eastern Relief Road and development of Shipley as a transport hub. Improvements to Frizinghall and Shipley railway stations, bus provision along Canal Road and completion of the Canal Road Greenway have ensured the Corridor is an integrated and sustainable location, which offers opportunities for travel by a range of sustainable transport options.

Strategic Objectives

3.4 The Vision for the AAP will be achieved through the following Strategic Objectives – *I would add that strategic objectives are important but there implementation is crucial and how that is achieved and delivered is critical*:

1. Deliver an Urban Eco Settlement of over 3100 new homes within the AAP boundary by 2030 that will create exemplar sustainable neighbourhoods, which encourage healthy lifestyles and contribute to the key aims of delivering a low carbon economy.

2. Promote the effective use of land by delivering at least 55% of new housing development within the AAP on previously developed land. *Site DF3 is one such site which is being restrained by unnecessary complications, inhibiting the delivery of the housing target.*

3. Deliver a range of well designed high quality dwellings which meet the District’s current and future housing needs and support low carbon living.

4. Support sustainable economic growth and the transition to a low carbon economy by protecting and enhancing established employment areas and promoting a wide range of high quality economic development opportunities within the Corridor.

5. Support the vitality and viability of Bradford city centre and Shipley town centre as thriving places for shopping, living, leisure, tourism and business. *The current use of site DF3 is NOT supporting the vitality and viability of Shipley Town Centre and not providing a sense of place for shopping. LIVING, and enjoying leisure, tourism and business. The proposed use would very much help deliver all of this vitality and regeneration.*

6. Enhance Shipley and improve links between the town centre, Saltaire, Shipley Station and the Leeds and Liverpool Canal through new mixed use development, enhancements to the public realm and encouraging leisure and tourist developments, whilst respecting the ‘outstanding and universal value’ of the UNESCO World Heritage status of Saltaire. *Our proposals very much respect the value of the UNESCO World Heritage Site and can only improve the overall environment and its setting. Yes we would improve links and pedestrian penetration into and through the site.*

7. Protect and enhance biodiversity and green infrastructure by strengthening ecological networks and establishing a multi-functional linear park; consisting of a chain of interconnected green spaces and natural environments linked to an improved Bradford Beck and the Canal Road Greenway. *WE have committed in our Draft S106 to improving local greenspace. A contribution that will not happen if the proposed development and regeneration is inhibited and restricted unnecessarily.*

8. Reduce the impact of climate change through mitigation and adaptation by managing the risk of flooding along the Corridor, including from the Bradford Beck, and using opportunities provided by new development to enhance green infrastructure and deliver low carbon developments which maximise renewable energy generation, water and energy efficiency and sustainable urban drainage.

9. Maintain and improve Canal Road as a key strategic transport route and maximise sustainable transport options by developing critical road and public transport infrastructure, including improvements to Canal Road and Shipley and Frizinghall stations and creating safe and attractive cycle and pedestrian routes linked to the Linear Park and Canal Road Greenway, connecting Shipley and Bradford.

10. Enhance resident’s health and education outcomes through supporting development which encourages healthy lifestyles, promotes integration and improves access to good quality homes, jobs, schools, green space, sport and recreation facilities, and by reducing pollution and managing air quality along the Corridor particularly in identified Air Quality Management Areas.

*We fully support the ambitions of paras 8, 9 and 10.*

11. Protect and enhance the historic environment and setting of the Saltaire World Heritage Site by ensuring that development proposals avoid substantial harm and take account of the potential impact upon the character and setting of key heritage assets in the area, and where possible enhance the elements which contribute to their significance.

*The redevelopment of the former Windhill station, will cause NO HARM or impact (never mind substantial harm) to the world heritage site but must only improve its setting, NOR will it affect any KEY heritage assets (the old station buildings are NOT identified as KEY assets). I realise that the Inquiry into the Shipley and Canal Road Corridor Area Action Plan is not THE place to debate the development of one site or the retention or loss of some old dilapidated buildings but it does help illustrate that to be effective in bringing about change and regeneration and realising all the objectives that the plan must include cogent policies that ensure the most appropriate implementation of Policy. Buildings that MUST be retained should be indentified and justified. Whimsical references to buildings that “might” be of interest is not helpful. Policies need to be clear and concise as does their justification.*

Shipley Vision by 2030:

Shipley will have strengthened its role – *only if it adopts a realistic and dynamic approach to regeneration -* as an attractive place to live, work and visit with a vibrant town centre, new high quality mixed use developments and excellent public transport links. The retail offer of Shipley town centre will be enhanced, supported by a wider range of business, leisure and community uses alongside new homes. Market Square will remain the focus for the town centre, with new and refurbished buildings alongside high quality public realm, reconnecting the town with its quality built heritage. Significant improvements to public transport facilities and Shipley Station will see Shipley develop as an important transport hub. New and improved pedestrian and cycle routes will provide better linkages between the town centre, Shipley Station, Saltaire and the Leeds and Liverpool Canal, helping to recapture footfall and expenditure and improve the quality and attractiveness of the public realm around the town.

The Dockfield Road area will become a vibrant and attractive residential and business location - *only if it adopts a realistic and dynamic approach to regeneration -*, with high quality mixed use development around the waterside setting of the Leeds and Liverpool Canal and the River Aire. New homes, jobs and green spaces alongside the Bradford beck will be provided through comprehensive residential led mixed use development at Shipley East. This area will include a mix of family housing and apartments with supporting business and retail uses, which are well linked to Shipley Station and the town centre.

Context

3.14 Shipley has many distinct advantages that make it a focus within the Corridor. It has superb rail connectivity offering short journey times from Shipley Station to Bradford city centre and Leeds and rail links to London. The town centre is the focal point for the provision of shopping, leisure and public services, which caters for the local needs of the catchment north of Bradford city centre.

3.15 Within close proximity to the town centre is the World Heritage Site of Saltaire and significant employment areas, including a vibrant industrial and office cluster around Dockfield Road. Salt’s Mill, the focal point of Saltaire, is a fantastic example of the area’s architectural heritage and there are clusters of attractive historic buildings around the fringes of the town centre and the Leeds and Liverpool Canal Conservation Area.

3.16 Despite these advantages the town centre is not as attractive and vibrant a place as it should be - *CORRECT*. The environmental quality throughout the town centre varies and a number of units are in need of investment and refurbishment - *CORRECT*. The town centre experience is further undermined by unattractive pedestrian links between the town centre, Saltaire, Shipley railway station and the Leeds and Liverpool Canal.

3.17 There is significant scope for Shipley to enhance its current position as an important town centre, through the refurbishment and redevelopment of parts of the existing town centre and new residential and mixed use development in and around the town centre and Dockfield Road. Shipley Development Framework – *CORRECT but only if it adopts a realistic and dynamic approach to regeneration.*

3.18 Development will help to strengthen Shipley’s role as an important town centre and transport hub and safeguard and enhance the setting of the area as a key gateway to the World Heritage Site of Saltaire.

3.19 The Shipley sub area is broken down into 3 further areas which reflect the different characteristics and opportunities.

Shipley Town Centre (STC)

3.20 The town centre will be the focus for the provision of shopping, leisure and public services in Shipley. The town centre will be strengthened and diversified with a wider range of uses. The public realm, streets and pedestrian connections around the town centre will be enhanced to create a better quality town centre environment that is well integrated with its surroundings.

3.21 Market square will be maintained as the focal point of the town centre through the redevelopment and refurbishment of existing buildings and frontages around Market Square, alongside new mixed use development and enhanced public realm and market.

3.22 Shipley Station will be enhanced as a major transport hub. The development of sites adjoining the station will be expected to support this function. Dockfield Road (DR)

3.23 Sites around the Dockfield Road area will be developed for a range of business and residential uses as part of the regeneration of the area as a high quality waterside mixed use area. Shipley East (SE)

3.24 The development of land at Shipley East provides a key opportunity to deliver a high quality residential led development with supporting business, commercial and retail uses which are well linked to the station and town centre. Through development improvements will be sought to green infrastructure and habitat networks alongside the Bradford Beck. Shipley- Heritage and Design

3.25 The key characteristics of the area, which should be considered in any proposed development, are:

* the Leeds and Liverpool Canal Conservation Area and key historic landmark buildings and features
* sensitive repair/reuse of traditional buildings around the Leeds and Liverpool Canal and Shipley town centre
* high quality design to reconnect the town centre with its quality-built heritage and enhance the setting and important views into or out of the World Heritage Site of Saltaire.
* respond positively to the Bradford Beck, Leeds and Liverpool Canal and River Aire as key waterways and green infrastructure and habitat assets.

3.26 Key historic buildings and heritage assets within the Shipley sub area include:

* Grade II listed Manor Lane Wesleyan Reformed Church
* Grade II listed Junction Bridge
* key unlisted buildings including the former **Shipley and Windhill Railway Station** and Pumping Station – *up until now the former railway station has only been identified as being of possible local interest and its “upgrade” has not been justified and I would suggest has only come about following the submission of the application to demolish.*
* Shipley Old Hall, Otley Road

3.27 Development in Shipley sub area will include:

Residential Units – approximately 690 units through residential and mixed use developments in Shipley East, Dockfield Road and the town centre - *only if it adopts a realistic and dynamic approach to regeneration.*

A new supermarket well connected to the town centre to meet identified retail capacity

SECTION TWO THE VISION, OBJECTIVES & DEVELOPMENT PROPOSALS

* New comparison and convenience retail, business, community and leisure uses within the town centre
* New business and employment uses as part of mixed use developments in Shipley East and Dockfield Road
* Enhanced green infrastructure and ecological networks along the Bradford Beck, Canal Road Greenway and Leeds and Liverpool Canal
* Safer and more attractive pedestrian and cycle links and connections between the town centre, Leeds and Liverpool Canal, Saltaire and Shipley railway station
* Public realm enhancements including improvements to Market Square and Well Croft, Kirkgate, Westgate and Otley Road to improve the built environment around the town centre.

Key Development Opportunities:

* Land and buildings around Market Square in Shipley Town Centre (STC)
* Dockfield Road (DF)
* Shipley East (SE)

One site is DF3 Land between Leeds Road and Dock Lane which identified for: Residential/mixed use. *The allocation for Residential/mixed use - I find misleading. Does it mean that all sites should include residential AND mixed uses or does it mean that they can be developed for either residential or mixed use?. Perhaps the allocation should read : Residential OR Residential and/or mixed use, which may include office/business, retail or leisure.*

*3.* DF3: Land between Leeds Road and Dock Lane Site address:

Land between the railway line, Dockfield Road and Dock Lane, Shipley.

Existing use: Storage/business/scrap yard

Proposed use: Residential/mixed use

Site size: 0.71ha

Flood Zone: 1

The site is located on a key gateway route into Shipley and Saltaire fronting onto Leeds Road and is current in use for industrial/waste management. The area is likely to experience significant change following the regeneration of Shipley East, ***which could provide the stimulus for further*** redevelopment in the area. The regeneration of the site presents the opportunity to provide a more attractive frontage onto Leeds Road and Shipley East and ***enhance the setting*** of the Leeds and Liverpool Canal and Saltaire World Heritage Site.

Site Proposal

The site’s location opposite Shipley East and in close proximity to the station, gives it potential for redevelopment as part of the regeneration of the area. The site is suitable for suitable for business, commercial and residential uses. Redevelopment proposals should consider the comprehensive redevelopment of the site, including the relocation of the scrap yard subject to landowner agreement.

Development of the site will be expected to:

1. provide high density residential development, including flats/apartments
2. provide a strong frontage to Leeds Road to create an enhanced gateway to Shipley and the World Heritage Site of Saltaire.
3. safeguard and enhance the setting of Leeds and Liverpool Canal Conservation Area and key unlisted buildings, including the former Shipley and Windhill Railway Station and Pumping Station, which should be retained and integrated into any proposed redevelopment of the site – *the retention of such buildings is not justified – no argument is put forward.*
4. accommodate future ambitions to reinstate the Bradford Canal in accordance with Policy SCRC/ST8 – *this is a very ambiguous requirement as nobody knows what it means. As I understand it,* it’s *an ambition which although of some merit is very expensive and not likely to happen and how should this site reflect this ambition – this needs clarification.*
5. provide a positive visual backdrop when seen from the adjacent railway line Transport and Movement
6. This is an edge of centre site in a highly accessible location, close to the railway station and in an area where the local highway network is already at or near capacity. Therefore the development would be required to minimise traffic generation and incorporate a Travel Plan taking into account the adjacent core public transport, cycling and walking networks.
7. Development proposals should be accompanied by a Transport Assessment detailing access and service arrangements and connectivity to the wider highway network. There should be no new site access from Leeds Road. The existing site access from Dock Lane would be suitable – *but it doesn’t say suitable for what. Should it be the sole access/ egress point or can Leeds Road provide an ingress and some egress (left in - left out for example)*. Provision of direct pedestrian links to Leeds Road should be considered to compensate for substandard pedestrian facilities on Dock Lane.
8. Improvements to pedestrian and cycle links within and through the site to existing networks would help to connect the development to the surrounding area and encourage walking and cycling. This should include exploring the potential of creating a link between the railway station and the canal through the site via Junction Bridge
9. Expected Development - 60 residential units, business, commercial uses.

*4. CONCLUSION*

*4.1 The allocation should be clear. Implementation policies need to be robust and the retention of any buildings needs to be fully justified.*

*4.2 My sincere apologies for not being able to attend in person.*

*Richard Askham – 10th October 2016*