

Bradford City Centre Area Action Plan: Publication Draft

State of Consultation

**Public Consultation
December 2015 – February 2016**

FORWARD

This Statement of Consultation relates to the public consultation that was carried out on the Publication Draft of the Bradford City Centre Area Action Plan (AAP) in 2015 / 2016 and the responses received as a result.

The Publication Draft consultation formed the final round of public consultation on the City Centre AAP. The consultation sought to involve interested parties and stakeholders and invite representations on the draft planning policies and development allocations put forward by the council.

This Statement of Consultation provides a link between the representations received and how these have been taken into account and addressed in the AAP Submission Draft document.

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1.0 INTRODUCTION & BACKGROUND

- 1.1 The Planning and Compulsory Purchase Act 2004 brought about a major change to the planning system, in particular to planning policy and how development plans are to be prepared. This means that the adopted Replacement Unitary Development Plan (RUDP) (2005) will, in time, be replaced by the Local Plan (previously Local Development Framework). The Bradford City Centre Area Action Plan (AAP) is being produced as part of the Bradford District Local Plan. When preparing documents which will form part of the Local Plan, the council must carry out public consultation and engage with local communities and stakeholders in order to gauge views on the plan and its soundness. The minimum requirements which all authorities must achieve are set out within the planning regulations.
- 1.2 Planning Authorities are also required to prepare and publish a Statement of Community Involvement (SCI) which explains when and how any public consultations will take place, who will be consulted and what will be done to engage with the community at each stage of the consultation process and also within planning applications. The council is fully committed to community engagement in the delivery of local services and functions. The SCI for Bradford was adopted by the Council on 8th July 2008.
- 1.3 This report contains details of the full consultation process carried out for the Bradford City Centre AAP Publication Draft, a summary of representations received and how these representations have been taken into account in the preparation of the Submission Draft Draft.
- 1.4 Section 2 of the report sets out the methods of consultation and the programme of events. Section 3 provides a summary of the main issues raised from the consultation responses. Section 4 sets out the next steps for how the City Centre AAP will progress.
- 1.5 It is considered that this report provides a fair and accurate representation of comments, however some comments have necessarily been summarised. It should be noted that officers work from both these summaries and from the detailed full comments submitted to move forward to the next stage of the AAP. Appendix 3 contains a summary of all representations and Bradford Council's responses to the representations received.

Purpose of this document

- 1.6 When preparing the local plan, the council must notify key consultation bodies and stakeholders of the subject of the local plan which the council propose to prepare, invite representations about what the local plan ought to contain and take into account any representation made.
- 1.7 This Statement of Consultation report sets out how the council has involved the community and key stakeholders in the preparation of the Bradford City Centre Area Action Plan. It sets out what was done to consult the different organisations, agencies, and residents of the district, how this met the requirements of the regulations and how it complies with the council's adopted SCI. It also describes

how the results of the consultations have been taken into account in preparing the next stage of the plan – the Publication Draft.

- 1.6 The relevant regulations as set out within the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations are listed below:
- Regulation 17- Application and interpretation of Part 6 (Local plans)
 - Regulation 18- Preparation of a local plan
 - Regulation 19- Publication of a Local Plan
 - Regulation 20- Representations relating to a local plan
 - Regulation 22- Submission of documents and information to the Secretary of State
- 1.7 This report has been prepared to provide a formal record of the consultation which has taken place to accord with Regulation 22 'Submission of documents and information to the Secretary of State'. Regulation 22 requires the submission of a local plan to be accompanied by a statement, setting out the following:
- (i) how those bodies and persons were invited to make representations (Section 2 and Appendix 2)
 - (ii) a summary of the main issues raised by the representations made pursuant to regulation 19 (see Section 3 and Appendix 3)
 - (iii) how any representations made pursuant to regulation 18 have been taken into account (see Section 3)

Bradford City Centre Area Action Plan

- 1.8 The Bradford City Centre AAP is being produced as part of the Bradford District Local Plan. The Local Plan will be made up of a collection of planning documents that will guide future growth and development for the next 15-20 years. The AAP will set out detailed land uses and direct future development and investment.
- 1.9 There are a number of stages for preparation of the City Centre AAP; these are highlighted in the list below:
- 1 Pre-production scoping and evidence gathering (2006-2007)
 - 2 Consultation on Issues and Options (2007 – 2008)
 - 2 Consultation on Further Issues and Options (2013)
 - 3 Consultation on Publication Draft (2015)**
 - 6 Submission to Secretary of State
 - 7 Examination
 - 8 Adoption following an Inspectors report.
- 1.10 The Publication Draft consultation formed the final round of public consultation on the City Centre AAP. The consultation sought to involve interested parties and stakeholders and invite representations on the key issues and emerging development options put forward by the council. This Statement of Consultation relates to the public consultation that was carried out for the Publication Draft of the Area Action Plan (AAP) in 2015/16 and the responses received as a result.

2.0 METHODS OF CONSULTATION & EVENTS PROGRAMME

- 2.0.1 The City Centre AAP presented a final draft plan with policies and proposed allocation sites for public consultation. It was the intention of the council to seek the views of key stakeholders, agencies, community groups and residents with regards to soundness of the policies and proposals presented within AAP, along with the evidence base which supported the report.
- 2.0.2 Publication Draft Report was taken to the Council's Executive Committee for approval for public consultation on the 13th October 2015 and to Full Council on the 20th October.
- 2.0.3 In line with the SCI and requirements of the planning regulations, the council undertook a planned eight week public consultation on the Preferred Approach draft from December 2015 to February 2016. The consultation period started 14th December and finished on 8th February 2016, covering 8 weeks in total.

2.1 Consultation and Supporting Documents

- 2.1.1 The following documents were produced and made available for the Publication Draft consultation:

- Bradford City Centre AAP Publication Draft
- Habitats Regulations Assessment Screening Report
- Duty to co-operate statement
- Engagement Plan
- Health Impact Assessment Report - Draft
- Sustainability Appraisal Non Technical Summary
- Equality Impact Assessment
- Guidance note to accompany the Publication stage
- Statement of Representations Procedure
- Bradford City Centre comment form
- Statement of Consultation
- Sustainability Appraisal Report
- Ecological Assessment
- Infrastructure Delivery Plan
- Green Infrastructure Study
- SFRA Level 2 Appendix A
- SFRA Level 2 Appendix B
- SFRA Level 2 Appendix C
- Strategic Flood Risk Assessment Level 2
- Transport Study
- Viability Report Working Draft

- 2.1.2 Copies of the key consultation documents were placed for inspection at the following deposit locations listed below. Notifications of these locations were given in the consultation letter and on the council's website. Deposit locations were:

- at Planning Offices in Bradford (Jacobs Well)

- Ilkley Town Hall
- Council One Stop Shops at Keighley
- Shipley Town Hall
- in the main local libraries in Bradford, Bingley, Keighley and Ilkley

Evidence Base & Supporting Documents

2.1.3 In addition to the above consultation documents, the following reports which form part of the Local Plan’s evidence base were made publically available on the Council’s Local Plan webpages:

- Affordable Housing Economic Viability Assessment (AHEVA)
- Bradford District Employment Land Review Study
- Bradford District Housing Requirement Study
- Bradford District Retail Study
- Conservation Area Assessments & Management Plans
- Core Strategy Baseline Analysis Study
- District Wide Transport Study
- Draft Settlement Study
- Gypsy and Travellers Accommodation Assessment
- Local Economic Assessment (LEA)
- Local Infrastructure Plan
- Open Space Assessment
- Strategic Flood Risk Assessment Level 1 (SFRA)
- Strategic Housing Land Availability Assessmentn (SHLAA)
- Strategic Housing Market Assessment (SHMA)

2.2 Who was consulted?

2.2.1 Approximately 1,800 stakeholders, members, groups and individuals were invited to make comments to the Publication Draft consultation documents outlined above. The table below indicates those persons or bodies consulted. These are organised in line with the SCI.

Consultees List	Number of consultees
Statutory consultees	100
Previous respondents to Bradford City Centre AAP consultation	46
Other consultees	39
Councillors	90
LDF Notification List	1564
Total	1839

2.3 How the public and other stakeholders were consulted

2.3.1 The council used a number of different methods of community consultation and engagement which aimed to reach the different groups within the district. The ranges of methods used are outlined below:

2.3.2 A total of 1,839 **written notifications** were sent out on Monday 7th December 2015, either by letter or by email, to individuals, community groups, developers, agents and infrastructure providers in line with the SCI, notifying them of the consultation, how to view the documents and inviting them to make comments before the set deadline. A sample of the letter can be found in Appendix 2.

2.3.3 The table below provides a summary of who was consulted and by what means.

Links to SCI	Consultee	Method of notification
Specific Consultation Bodies	Statutory Bodies	Letter and email
	Town & Parish Councils	
General Consultation Bodies	General Consultees	Email
Other Consultees	Other Consultees	Email
List of Other Organisations and Groups not identified in Planning regulations	Bradford Councillors	Email
	Notification Request	Email
	LDF Newsletter Subscribers	Email
	Previous respondents to AAP consultation	

2.3.4 The Council issued a press release in December following Council Executive approval for public consultation. A copy of this can found in Appendix 2. Local news press / media provided coverage on the Publication Draft consultation. In particular, the Telegraph and Argus ran an article to highlight the draft plan and how to get involved for the local communities. The news article published can be found in Appendix 2. The following newspaper article was published by the Telegraph and Argus on Tuesday 13th October 2015:

http://www.thetelegraphandargus.co.uk/news/13844667.Regeneration_plans_for_Bradford_city_centre_Shingley_and_the_Canal_Road_approved/

2.3.5 The **Council's local plans website** (www.bradford.gov.uk/planningpolicy) was used to facilitate communication of the consultation and the time period. Consultation documents were made available to view and download throughout the consultation process and details of the technical and area 'drop-in' events were advertised. Details of how people could comment on the consultation documents, along with a comment form and online survey were clearly provided. A copy of the webpage can be found in Appendix 2. A link to the Publication Draft consultation was also placed on the council's main Consultation webpage <http://www.bradford.gov.uk/bmdc/Consultations>.

2.3.6 The use of a revised online survey form was used during the public consultation of the Publication Draft. The use of the new online survey form was considered productive and will be used more widely for parts of the Local Plan such as the Allocations DPD. The Council also trialled a new online interactive map to increase accessibility and the usability of the planning documents. The interactive

map also contained links to the online comment form to allow users to more easily make comments on planning policies and proposals put forward in the AAP.

2.3.7 **The November 2015 issue of the LDF Newsletter - *Plan-It Bradford*** was sent out electronically via email to over 1000 subscribers in November 2015 with details of the Publication Draft consultation. This newsletter along with past editions is available to view on the council's website. Extracts from this newsletter can be found in Appendix 2.

2.3.9 Several **area consultation events** were organised across the Bradford district to allow stakeholders, community groups and residents to come along and find out more about the Draft Area Action Plans and to gain a better understanding of the Local Plan process.

2.3.10 At each of these area events the following were available:

- consultation documentation (as listed in paragraph 2.1.1)
- evidence base documents
- exhibition panels summarising the documents
- officers from the council's Development Plans Team were available to answer any questions at each event.

2.3.12 The table below outlines the area consultation events which took place:

Date	Time	Area	Venue
Thursday 7 th January 2016	4pm- 7pm	Shipley	Kirkgate Centre
Monday 11 th January 2016	4pm- 7pm	City Centre	City Centre Library

2.3.13 The events were well attended and provided the opportunity for interested stakeholders and the public to talk to officers, ask questions and look in detail at the draft policies and proposals in the AAPs.

3. Schedule of Consultation Responses

3.1.1 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
1.	0001	Ann Morgan	Resident	
2.	0002	Lisa Reardon	Bradford District Crime Prevention Design Advisor	
3.	0003	Rachael A Bust	The Coal Authority	
4.	0004	Ian Smith	Historic England	
5.	0005	Toni Rios	Highways England	
6.	0006	Richard Hall	Natural England	
7.	0007	Lauren Garside	Yorkshire Wildlife Trust	
8.	0008	Ross Anthony	The Theatres Trust	
9.	0009	Montagu Evans on behalf of Mary Street Estate Ltd.	Mary Street Estate Ltd.	
10.	0010	Ian Sanderson	West Yorkshire Archaeology Advisory Service (WYAAS)	
11.	0011	Susan Stead	Bradford Urban Wildlife Group	
12.	0012	Bev Lambert	Environment Agency	

3.1.2 SCHEDULE OF WRITTEN REPRESENTATIONS

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Anne Morgan	<p>I wish to make an addition to my previous comments regarding the conversion of car parks to residential units.</p> <p>Recent news has revealed that Morrisons is closing down, leaving existing residents with no where to shop. Our nearest supermarket will be Tesco, Canal Road. The walk there can take best part of 30 min each way, and the return with the weekly shop is all uphill. This is not appropriate for a popping out for a pint of milk, nor the the phone call from a housebound neighbour who wants a few items picking up.</p> <p>The only saving grace was the free bus, which although not perfect for the route there, and is a walk to the bus stop at the Canal Road end, at least allowed the opportunity to get some relief on the way back.</p> <p>The AAP states that public transport is essential if the car parking is to be reduced, The removal of viable public transport makes these plans unsustainable for the future and puts into question the ability for existing residents to continue living here.</p> <p>There needs to be an answer for local people who will be charged £2 to pop out in all weathers to get a pint of milk. I fear the elderly will go without, rather than face the cost and the struggle.</p>	<p>Noted.</p> <p>The Council acknowledges the importance of accessible convenience shopping in enabling sustainable city living.</p> <p>However, there are numerous other smaller convenience stores located throughout the city centre, and Policy CL3 (Active Frontages and Community Provision) encourages the use of ground floors of new residential development for retail (amongst other uses).</p> <p>Noted.</p> <p>The Council is committed to improving public transport in the City Centre and encouraging people to use public transport over other unsustainable modes (car). The AAP puts forward a number of transport improvements (Figure 19) and a planning policies which encourages the use sustainable transport modes.</p>	<p>No action taken.</p> <p>No action taken.</p>
	<p>Lisa Reardon</p> <p>Bradford District Crime Prevention Design Advisor</p> <p>West Yorkshire Police</p>	<p>Having read through the proposals for the City Centre, a few of the residential developments I was aware of, however there is quite an extensive list of future apartment builds and the concern is that with the number of apartments being built and the increase of residents living within the City Centre, this could have a significant impact on Policing resources.</p> <p>I understand the importance of redeveloping the City Centre, in that each new building can bring 106 financial contributions which help generate the rest of the area and I appreciate that when the apartments are developed, the Council have no say or influence over who live reside there.</p> <p>In the past there were many high rise apartment blocks located in the City Centre that housed 'problem residents' which caused an increase in crime, where they became areas for anti-social behaviour, the concern is that we don't want problems of the past to reoccur.</p> <p>If Police can continue to be consulted on each new residential build, we can continue to provide the advice and recommendations in respect of security measures to each development, which may reduce the risk of crime.</p>	<p>Noted.</p> <p>The Council will continue consulting with West Yorkshire Police on the City Centre Area Action Plan and on all major planning applications within the City Centre.</p>	<p>No action taken.</p>

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Ian Smith</p> <p>Historic Environment Planning Adviser (Yorkshire)</p> <p>Historic England</p>	<p>This Section paints a good general picture of the development of the City, of its rich legacy of buildings from the period when it was the wool capital of the World, and the important contribution they make to the distinctive character of the City Centre.</p> <p>We would endorse the comments regarding the quality of some of the buildings which were constructed during the 1960s and the fragmentation of the City Centre that resulted from the roadbuilding schemes of that period.</p> <p>The legacy of buildings associated with the period in which the Bradford was the one of the World's main manufacturers of cloth play a major role in defining the distinctive identity of its City Centre. This section illustrates the Council's commitment to ensuring that these buildings have a sustainable future and some of the measures and initiatives that it has put in to encourage their reuse and adaptation. It also demonstrates that that these buildings can attract inward investment and the role that its heritage can play the regeneration of the heart of the City.</p> <p>We welcome the amendment to the boundary of the AAP to -include the retail park at Forster Square. The connectivity of this area to the Broadway Shopping Centre and its relationship to the regeneration of the area around Forster Square Station is a key issue the AAP needs to address.</p> <p>It is not clear why the Area Action Plan includes the mosque and the surrounding streets which lie to the north-west of Drewton Road. In view of the way in which the highway network severs this area from the remainder of the City centre, the little functional connection it has with the Shopping and Markets Area, and the fact that this area is not likely to be a key area in the regeneration of the City centre, it should be excluded from the boundary of the AAP.</p> <p>Suggested Change - The extent of the Area Action Plan should be reviewed to exclude the area between Drewton Road and Darfield Street/Lumb Lane.</p>	<p>Noted.</p> <p>The boundary used to define the City Centre Area Action Plan is also used to define a number of regeneration programmes past and present, including the now defunct regeneration company BCR, Regional Growth Fund initiative and the City Plan. This multi-service, multi-discipline approach ensures the delivery and implementation of the AAP will be greatly enhanced.</p> <p>Amending the boundary to remove Drewton Road and Darfield Street / Lumb Lane will result in the a separation in the integrated approach, thus jeopardising future delivery.</p>	<p>No action taken.</p>
	<p>Toni Rios</p> <p>Asset Manager</p> <p>Highways England</p>	<p>The AAP is supported by a Transport Study completed during 2015. The Transport Study focused on the ability of the city centre road network to accommodate the level of development proposed in both the Bradford City Centre and Shipley and Canal Road AAPs but did not address any issues of linkage with areas beyond the city centre.</p>	<p>Noted.</p> <p>The Council consider the requirement for developers to test whether the committed RIS schemes are sufficient</p>	<p>No action taken.</p>

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>The Area Action Plan (AAP) objectives include the delivery of 3,500 additional homes in the city centre, a high quality shopping and leisure offer and an additional 6,000 jobs. This scale of development will generate significant volumes of traffic in the peak hour. We have therefore used our Network Analysis Tool (NAT) to determine whether the largest of the proposed housing sites generate sufficient traffic to have an impact on the strategic road network (SRN). (NAT is a spreadsheet model that is used to predict links flows on the motorway network resulting from proposed land use development).</p> <p>Our analysis indicates that the individual housing sites tested will not have a significant traffic impact on the SRN. The implication is that the other smaller sites proposed for housing development in the city centre will also not have a significant traffic impact on the SRN.</p> <p>Policy E1 Development of Employment Space includes a target of 6,000 new jobs in office and flexible workspace developments during the Plan period. This is compared with existing city centre employment of 36,000. The Publication Draft does not translate the number of jobs into a figure for office floor space making it difficult to use our NAT model to assess the traffic impact of individual sites on the SRN. All that we are able to say is that growth of 20 per cent in city centre office employment during the Plan period will generate significant additional traffic on the SRN in both peak periods.</p> <p>Analysis undertaken as part of the Highways England West Yorkshire Infrastructure Study (WYIS) indicates that traffic generated by Local Plan development in Bradford and the other districts in West Yorkshire does not result in any severe congestion on the M606. The WYIS does show that the M62/M606 Chain Bar scheme included in the government's Road Investment Strategy (RIS) will provide some capacity to cater for the additional traffic generated by proposed Local Plan development in Bradford and the rest of West Yorkshire however further capacity enhancement to existing slip roads may also be required by 2030. It also shows that capacity improvements will be needed at M62 junction 27 by 2022 and again by 2030.</p> <p>Policy M4 requires all development proposals in the city centre to be supported by a transport assessment to be assessed against Core Strategy Policy TR1 and the NPPF. Transport assessments should be required to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by city centre sites on the SRN. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to additional schemes identified by the Highways England WYIS and included in the LIP or other appropriate schemes.</p>	<p>to deal with the additional demand generated by a proposed scheme, and if so be expected to contribute to additional schemes identified by Highways England is consider an onerous burden and an unreasonable requirement. Should the Council make the suggested change, this would be contrary to paragraph 21 of the NPPF – <i>“Investment in business should not be over-burdened by the combined requirements of planning policy expectations.”</i></p>	

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
				No action taken.
	Tom Keatley Team Leader Natural England	HRA screening for City Centre AAP - Natural England welcomes the conclusions and recommendations of the screening report.	Noted	No action taken.
	Bev Lambert Environment Agency	NEIGHBOURHOODS As a result of the Boxing Day 2015 floods, a number of properties in Bradford were affected which have not previously flooded. It is imperative that the flood outline for this event is considered for the proposed sites put forward in this document. Appropriate mitigation measures should be proposed on the site assessment forms and will need to be included in any future flood risk assessments submitted. It may also be appropriate to consider incorporating this latest flood event in the Level 1 and Level 2 SFRA's.	Noted. All proposed allocations have been informed by an update to date Strategic Flood Risk Assessment Level (SFRA) 2. The latest available data has been used to inform the SFRA Level 2 for the City Centre. Bradford Beck Model is considered up to date and the most robust and sound evidence available.	No action taken.

VISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	We support the Vision especially those aspects which relate to:- <ul style="list-style-type: none"> • The sensitive renovation and reuse of the historic buildings in Little Germany and Giotside for residential and employment purposes. • New build development which has incorporated high-quality design which respects the architectural heritage of the city. • The safeguarding and enhancement of the City's important cultural assets. • The improvements to the two stations and the pedestrian routes between them • The creation of new open spaces and public realm improvements. • The intention that the plan will build upon and enhance the existing qualities of this part of the District. <p>These measures should help ensure that the City's heritage assets have a sustainable future and that the distinctive character of this part of the District is retained and reinforced.</p>	Noted. The Council welcomes Historic England's support.	No action taken.
	Bev Lambert	The Vision We are pleased to see that our previous comments have been included	Noted.	No action taken.

VISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Environment Agency	relating to aspirations for improving green and blue infrastructure within the AAP boundary.		

OBJECTIVES				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	Objective 1 We support that part of this Objective which relates to supporting the heritage identity of the City. The Vision sets out an intention to offer a different experience from other cities. A key component of this experience is the quality and character which Bradford's heritage assets provide. Objective 2 We support this Objective, especially the intention to continue the public realm improvements throughout the City Centre. Elsewhere in the Country, an attractive environment and, especially, a high-quality public realm, has been shown to be one of the key components of a successful city centre.	The Council welcomes Historic England's support.	No action taken.
	Tom Keatley Team Leader Natural England	Natural England support plan objective 8 for provision of biodiversity and green infrastructure. Natural England welcomes the integration and promotion of biodiversity enhancement as objectives	The Council welcomes Natural England's support.	No action taken.
	Lauren Garside Conservation Planning Officer Yorkshire Wildlife Trust	Yorkshire Wildlife Trust welcome and support objective 8 and its aim to incorporate wildlife and biodiversity into the development of Bradford City Area. Such is in accordance with Paragraph 118 of the NPPF which states that: ' <i>opportunities to incorporate biodiversity in and around developments should be encouraged</i> '. We advise that wildlife is incorporated into the design of schemes at an early stage in order to secure the best gains for biodiversity and that developments are linked up in their approach in order to provide wildlife corridors across the city area. <i>'Designing for Biodiversity: A Technical Guide for New and Existing Buildings (2nd edition) – Kelly Gunnell et.al., Riba Publishing'</i> provides detailed guidance on how biodiversity enhancements can be incorporated into new and existing buildings.	The Council welcomes Yorkshire Wildlife Trust's support.	No action taken.
	Bev Lambert Environment Agency	Objective 3 We also welcome the reference to remediation of historically contaminated sites as suggested in our previous response. Objective 8	Noted. Noted.	No action taken. No action taken.

OBJECTIVES				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>The inclusion of 'reopening watercourses' at the end of objective 8 is positive and welcomed.</p> <p>We note our other comments on objective 8 have not been incorporated. However, we acknowledge that the general context of these comments has been picked up in paragraph 4.104 and the associated evidence base document 'Bradford City Centre Green Infrastructure Study, October 2014'.</p>		

CENTRAL BUSINESS AND LEISURE DISTRICT				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Ian Smith</p> <p>Historic Environment Planning Adviser (Yorkshire)</p> <p>Historic England</p>	<p>(1) The University is not only completely divorced from the centre of the city but also has little presence from the City Park. Other Cities have demonstrated how the expansion of a university campus at the heart of a City can be used to regenerate/revitalise other parts of that settlement. The Design requirements for Site B/1.6 (the former Bradford Odeon) recognise the potential for this site to enhance connectivity between the Central Business and Leisure District and the Learning Quarter and the improvement in the links between the two areas also forms part of the Vision for the Learning Quarter. This ought to be articulated within the Vision for this part of the City as well.</p> <p>Suggested Change - (1) Vision for Central Business and Leisure District amend to read:- "The University now has a presence in the heart of the city and the Learning Quarter is linked to the Central Business and Leisure District by a high quality public realm"</p> <p>(2) The Introductory Section of the Area Action Plan and the Section on Connectivity and Public Realm both highlight the fragmented nature of the City Centre which makes it difficult for pedestrians. The Vision should include reference to the intention that, by 2030, it will be easier and more pleasant for pedestrians to move around and gain access to the Central Business and Leisure District from the surrounding Neighbourhoods.</p> <p>Suggested Change: (2) Vision for Central Business and Leisure District amend to read:- "Traffic management and other improvements have created an attractive public realm making it easier for pedestrians to access the Central Business and Leisure District from surrounding Neighbourhoods"</p> <p>This Section provides a good overview of the range of heritage assets found in this part of the City, the elements that are particularly distinctive, and the opportunities offered by some of the proposed development sites.</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to clarify the University is not divorced from the city centre.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to clarify the University is not divorced from the city centre.</p>	<p>No action taken at this time.</p> <p>No action taken at this time.</p>

CENTRAL BUSINESS AND LEISURE DISTRICT				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not. The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for the Central Business and Leisure District. Such a Policy would help to ensure that the Vision for this part of Bradford is realised.</p> <p>Suggested Change: Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account. This Policy should be based upon the Spatial Framework set out on page 21. (See also below)</p> <p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy. In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p> <p>Suggested Change - Add to the end of the above Policy:-</p>	<p>This section, provides a framework for the sub area which builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council considers that the Central Business and Leisure Neighbourhood Spatial Framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council disagree this section requires an additional policy as , in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p> <p>NPPF para 157 sets out that Local Plans should allocate</p>	<p>No action taken.</p> <p>No action taken.</p>

CENTRAL BUSINESS AND LEISURE DISTRICT				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</p> <p>B/1.2 - This site lies within the City Centre Conservation Area and its redevelopment could affect the setting of the Grade I Listed City Hall. Consequently we welcome the design requirements set out for this site especially that:-</p> <ul style="list-style-type: none"> ☐ The proposed development will be of high- quality contextual design that responds sensitively to its setting adjacent to the Grade I Listed City Hall and its location within the City Centre Conservation Area. ☐The height of any buildings will not compromise the dominance of the City Hall buildings or harm key views and vistas of the building., and ☐☐Where possible, opportunities should be taken to open up new views of the City Hall. <p>As this site is in a key location at the heart of the City centre it is essential that the development of this area helps to animate the area around the southern part of the City Park. Consequently, we welcome the requirement in the second bullet-point that ground-floor areas of this development must contain active frontages.</p> <p>B/1.4 - This site adjoins the Grade II Listed Victoria Hotel. The site also lies within the City Centre Conservation Area. Therefore we welcome the Design considerations that are set out for this site, especially that:-</p> <ul style="list-style-type: none"> ☐☐Any development should have regard the principles set out in the City Centre Conservation Area Assessment and Conservation Area Appraisal ☐☐Proposals should safeguard those elements which contribute to the significance of the adjacent Listed Building <p>The current cinema complex (The Leisure Exchange) whilst close to</p>	<p>sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate</p> <p>It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs.</p> <p>The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed Shipley site allocations as drafted are sound and the proposed change is not required to make the plan sound.</p> <p>Noted. The Council welcomes Historic England’s support.</p> <p>Noted. The Council welcomes Historic England’s support.</p>	<p>No action taken.</p> <p>No action taken.</p>

CENTRAL BUSINESS AND LEISURE DISTRICT				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>Bradford Interchange, is somewhat divorced from the main retail area and, with its own multi-storey car park, does not particularly encourage people to use the city centre as part of their visit to the cinema. Therefore we welcome the requirement that consideration should be given to how the development of this site might assist in helping to better integrate The Leisure Exchange with the remainder of the City Centre.</p> <p>B/1.5 - This site lies to the south of the Little Germany Conservation Area. It is important that the redevelopment of this former depot has regard to the potential impact that it could have on the character of Little Germany and on views out of the Conservation Area towards this site. Therefore, we welcome the Design Guidance set out in the first bullet-point.</p> <p>B/1.6 - There are a number of Grade II Listed Buildings surrounding this site including the Alhambra Theatre and the warehouse opposite the former Gaumont Theatre (to the south), and the former warehouses at 8 to 24 Quebec Street (to the west). The site also lies within the City Centre Conservation Area. We support the Design proposals for this site especially:-</p> <ul style="list-style-type: none"> ☐☐The possibility of retaining elements of the former Bradford Odeon ☐☐The requirement for development proposals to respond sensitively to the surrounding Listed Buildings and the City Centre Conservation Area. <p>The University is not only completely divorced from the centre of the city but also has little presence from the City Park. Other Cities have demonstrated how the expansion of a university campus at the heart of a City can be used to regenerate/revitalise other parts of that settlement. Therefore, we welcome the requirement that new development should seek to enhance connections between the Central Business and Leisure District and the Learning Quarter.</p>	<p>Noted. The Council welcomes Historic England's support.</p> <p>Noted.</p>	<p>No action taken.</p> <p>No action taken.</p>
	Ross Anthony Theatres Trust	<p>Regarding the section on the Central Business and Leisure District:</p> <p>Figure 3 has a different boundary to Figure 4 and should be amended for consistency i.e. Fig 3 excludes the former Odeon site, which should be included in the central district, given its potential relationship to the Alhambra and other cultural destinations.</p> <p>Regarding the former Odeon Site B/1.6, The Theatres Trust would encourage the AAP to specifically note the desire for 'cultural uses' on this site and to provide support for the ambitions to restore and return the building to an entertainment use.</p> <p>Suggested Change - Regarding the section on the Central Business and Leisure District:</p>	<p>Noted.</p>	<p>No action taken at this time.</p>

CENTRAL BUSINESS AND LEISURE DISTRICT				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>Figure 3 has a different boundary to Figure 4 and should be amended for consistency i.e. Fig 3 excludes the former Odeon site, which should be included in the central district, given its potential relationship to the Alhambra and other cultural destinations.</p> <p>Regarding the former Odeon Site B/1.6, The Theatres Trust would encourage the AAP to specifically note the desire for 'cultural uses' on this site and to provide support for the ambitions to restore and return the building to an entertainment use.</p>	<p>Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.</p>	
	<p>Bev Lambert Environment Agency</p>	<p>Site B/1.2: No.1 City Park The narrative associated with this site suggests that it is located in flood zone 3a. Our flood map shows it to be located in flood zone 1 and therefore at lower risk of flooding. Table 3-6 in the Level 2 SFRA (dated September 2015) also suggests that this site is in flood zone 1 but may be at 'nominal risk of surface water flooding'. We recommend that the flood risk comment is reviewed to reflect the correct situation.</p> <p>Site B/1.5: Former Yorkshire Water Depot We recommend that the narrative associated with flood risk on this site also highlights the requirements for the sequential and exception tests to be applied and passed on this site as stipulated in the Level 2 SFRA.</p>	<p>Noted.</p> <p>This appears to be a factual error in the Allocation Statement. As the potential flood risk is actually lower than stipulated within the DPD and the correct information is stated within the SFRA Level 2, this not considered a matter of soundness. However, a minor change could be made to clarify the correct potential flood risk on this site.</p> <p>Noted.</p> <p>The allocation statement currently states "Any planning application on this site must be supported by a site specific Flood Risk Assessment." The statement also states "A sequential approach to site layout should be followed with the aim of locating the residential units outside of Flood Zone 3a.". A sequential and exception tests have already been carried out within the SFRA Level 2. This is considered compliant with the requirements of the NPPF.</p>	<p>No action taken at this time.</p> <p>No Action taken.</p>
	<p>Susan Stead Bradford Urban Wildlife Group</p>	<p>Regarding Section 2. The Vision, Objective and Development proposals B/1.6 Former Bradford Odeon Princess Way. A non ecological comment – Planning Permission for a mixed use development is now redundant concepts so why repeat it here? It is obvious that the description of the potentially of this site is not up-to-date. The design section here includes information on the type of new building which might be developed here. It should be acknowledged that the building is now to be restored as a music venue and performance area. Already the music team wishing to restore their vision for the Odeon has been approved by the Council and supported. This page needs amendment There should be a sound appraisal concerning consultation with the accepted organisations now hoping to restore the Odeon. How sound is the communication between the Music Live Group and the Planning Department?</p>	<p>Noted.</p> <p>The design section of the allocation proposal statement for site B/1.6 establishes guidance for any developer wanting to develop the site.</p> <p>The Council will continue to work with any developer in the successful delivery of the proposed allocated site.</p>	<p>No action taken.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Rachael Bust Chief Planner / Principal Manager Coal Authority	<p>The specific comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:</p> <p>Representation No.1</p> <p>Site/Policy/Paragraph/Proposal – Little Germany – Sites CH1.5 & CH/1.6</p> <p>Comment – Sites CH/1.5 (Burnett Street Car Park) and CH/1.6 (Olicana House, Chapel Street) in Little Germany are allocated for residential use. These sites are underlain by unrecorded probable shallow coal workings exist in thick coal outcrops as follows and it is suggested that this fact would be identified as a site specific issue in the schedule for each site on pages 38 and 39. Policy EN8 of the Core Strategy sets out an overall framework for addressing land instability.</p> <p>Reason – To aid the recognition of constraints to potential developers</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to clarify the potential mineral resource issue on these site.</p>	No action taken at this time.
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	<p>This Section provides a good overview of the range of heritage assets found in this part of the City, the elements that are particularly distinctive, the challenges they face, and the opportunities offered by some of the proposed development sites.</p> <p>This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for the Little Germany and Cathedral Quarter Neighbourhood. Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p> <p>Suggested Change - Add an additional Policy to the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account and which will deliver the Vision that is set out on page 30 and 31.</p>	<p>This section, provides a framework for the sub area which builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council considers that the Little Germany and Cathedral Quarter Neighbourhood Spatial Framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council disagree this section requires an additional policy as , in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p> <p>NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate</p>	<p>No action taken.</p> <p>No action taken.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
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		<p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p> <p>CH/1.1 - The buildings on the southern side of Holdsworth Street are Grade II Listed. These buildings also denote the northern edge of the Cathedral Precinct Conservation Area. Therefore, we welcome the requirements that proposals for the development of the southern end of the site will need to ensure that they relate sensitively to the character and setting of these Listed Buildings and the Cathedral Precinct Conservation Area.</p> <p>CH/1.2 - This site lies between the City Centre Conservation Area (the boundary of which it adjoins) and the Cathedral Precinct Conservation Area. Therefore, we welcome the Design Guidance for this site especially that:-</p> <ul style="list-style-type: none"> ☐☐Development should respond to the surrounding historic context ☐☐The walls of the former Midland Railway Station (which make a considerable contribution to the townscape character of the surrounding area) should be retained. ☐☐New high quality public realm should be delivered through the development ☐☐The potential for the creation of east-west routes between the Cathedral Quarter and the Station. <p>CH/1.3 - This site includes the Ring O'Bells public house (at its southern end) and lies to the south of Bradford College Cathedral Building. Both these buildings are Grade II Listed. The southern part of the site, to the east and south of the public house, lies within the Cathedral Precinct Conservation Area.</p> <p>Therefore, subject to the change set out below, we welcome the Design Guidance especially that:-</p> <ul style="list-style-type: none"> ☐☐The stone-setted route of Captain Street should be retained and exploited as the focus for development. ☐☐The scale and design of new development should respond sensitively to the surrounding historic context, and safeguard the character and setting of the two Listed Buildings. ☐☐The tower of the former school should remain as a prominent local landmark at the northern end of this site <p>One of the characteristics of development in the City Centre (which was noted in the Draft Baseline Report) is that taller buildings tend to be in</p>	<p>It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs.</p> <p>The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed Shipley site allocations as drafted are sound and the proposed change is not required to make the plan sound.</p> <p>Noted.</p> <p>Noted.</p>	<p>No action taken.</p> <p>No action taken.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>the valleys with the numbers of stories in the buildings decreasing as they go up the hillside. Therefore a reduction in heights higher up the slopes should be a requirement not an option. It is suggested that this Section uses the same phraseology as used elsewhere in the AAP.</p> <p>CH/1.4 - This site lies adjacent to the Grade II Listed Bradford College Cathedral Building. Subject to the amendment set out below, we support the Design requirements for this area especially that the scale and design of new development should respond sensitively to the surrounding historic context.</p> <p>One of the characteristics of development in the City Centre (which is noted in the Draft Baseline Report) is that taller buildings tend to be in the valleys with the numbers of stories in the buildings decreasing as they go up the hillside. Therefore we welcome the requirement that the layout and scale of the buildings should respond to the sloping nature of the site and that lower buildings are likely to be most appropriate on the upper slopes.</p> <p>The Bradford College Cathedral Building, to the east of this site, is a Grade II Listed Building. The tower of this former school is a prominent local landmark. The Design Requirements for the adjacent site (CH/1.3) include one which seeks to retain the tower of this building as a prominent local landmark. A similar requirement should be included for this site.</p> <p>Suggested - Add the following additional bullet-point to the section on Design:- “Any development should ensure that the tower of the former Bradford College Cathedral Building, to the east of this site, remains as a prominent local landmark”.</p> <p>CH/1.5 - There is a group of Grade II Listed Buildings along the southern side of this car park. Paper Hall, on the opposite side of Barkerend Road, is a Grade II* Listed Building. The site also lies within the Little Germany Conservation Area. Subject to the amendment set out below, we support the reference to the presence of these heritage assets and endorse the intention to create urban blocks which define and enclose the streets to repair the urban fabric of this part of Little Germany.</p> <p>Whilst the Design requirements note the presence of the heritage assets in its vicinity, there are no details about how they should be addressed. In line with the approach adopted elsewhere within this AAP, the need for any development to have regard to the heritage assets in its vicinity should be referred to as part of the design principles.</p> <p>In addition, one of the characteristics of development in the City Centre</p>	<p>Noted.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p>	<p>No action taken.</p> <p>No action taken at this time.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
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		<p>(which was noted in the Draft Baseline Report) is that taller buildings tend to be in the valleys with the numbers of stories in the buildings decreasing as they go up the hillside. In order to reinforce this aspect of Bradford's character, the design principles should also provide advice on the height of buildings which would be acceptable on this hilltop location.</p> <p>Suggested Change – (1) Design – Add an additional bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context, and safeguard the character and setting of the nearby Listed Buildings”. (2) Design – Add an additional bullet-point along the following lines:- “The layout and scale of the buildings should respond to the sloping nature of the site. It is likely that lower buildings will be most appropriate on the upper slopes”</p> <p>CH/1.6 - There are Grade II Listed Buildings to the north, south and west of this building. It also lies within the Little Germany Conservation Area.</p> <p>Whilst the Design requirements note the presence of the heritage assets in its vicinity, there are no details about how they should be addressed. In line with the approach adopted elsewhere within this AAP, the need for any development to have regard to the heritage assets in its vicinity should be referred to as part of the design principles.</p> <p>Suggested Change - Design – Add an additional bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context, and safeguard the character and setting of the nearby Listed Buildings”.</p> <p>CH/1.7 - There is a group of Grade II Listed Buildings to the north-west of this building. It also lies within the Little Germany Conservation Area. Whilst the Design requirements note the presence of the heritage assets in its vicinity, there are no details about how they should be addressed. In line with the approach adopted elsewhere within this AAP, the need for any development to have regard to the heritage assets in its vicinity should be referred to as part of the design principles.</p> <p>Suggested Change - Design – Add an additional bullet-point along the following lines:-</p>	<p>Noted. Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted. Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted. Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted. Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p>	<p>No action taken at this time.</p> <p>No action taken at this time.</p> <p>No action taken at this time.</p> <p>No action taken at this time.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>“The scale and design of new development should respond sensitively to the surrounding historic context, and safeguard the character and setting of the nearby Listed Buildings”.</p> <p>CH/1.8 - This site adjoins the boundary of the Cathedral Precinct Conservation Area. The need for development proposals to safeguard the character of the Conservation Area should also be a requirement for the development of this area.</p> <p>Suggested Change - Design – Add an additional bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the character of the adjacent to Cathedral Precinct Conservation Area”</p> <p>CH/1.9 - This is a very sensitive site within the Little Germany Conservation Area and adjacent to the boundary of the Cathedral Quarter Conservation Area. It has Grade II Listed Buildings to its southwest, north-east and south-east and lies opposite the Grade I Cathedral Church of St Peter.</p> <p>One of the characteristics of development in the City Centre (which is noted in the Draft Baseline Report) is that taller buildings tend to be in the valleys with the numbers of stories in the buildings decreasing as they go up the hillside. In order to reinforce this aspect of Bradford’s character, the reduction in heights higher up the slopes should be a requirement not an option.</p> <p>The need for development proposals to have regard to the sensitivities of this site need to be better reflected in the Design Principles.</p> <p>Suggested Change - (1) Design – Add the following additional bullet-points along the following lines:- “This site lies within the Little Germany Conservation Area and adjacent to the boundary of the Cathedral Quarter Conservation Area. It has Grade II Listed Buildings to its south-west and north-east and lies opposite the Grade I Cathedral Church of St Peter. The scale and design of new development should respond sensitively to the surrounding historic context and safeguard the character and setting of the Conservation Areas of Little Germany and the Cathedral Quarter and of the surrounding Listed Buildings (including St Peter’s Cathedral)”. (2) Design – Add an additional bullet-point along the following lines:- “The layout and scale of the buildings should respond to the sloping nature of the site. It is likely that lower buildings will be most appropriate on the upper slopes”</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p>	<p>No action taken at this time.</p> <p>No action taken at this time.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>CH/1.10 - This is a very sensitive site within the Little Germany Conservation Area and adjacent to the boundary of the Cathedral Quarter Conservation Area. It has Grade II Listed Buildings to its southwest and north-east and lies opposite the Grade I Cathedral Church of St Peter. One of the characteristics of development in the City Centre (which is noted in the Draft Baseline Report) is that taller buildings tend to be in the valleys with the numbers of stories in the buildings decreasing as they go up the hillside. In order to reinforce this aspect of Bradford's character, the reduction in heights higher up the slopes should be a requirement not an option. The need for development proposals to have regard to the sensitivities of this site need to be better reflected in the Design Principles.</p> <p>Suggested Change - Design – Add the following additional bullet-points along the following lines:-</p> <p>“This site lies within the Little Germany Conservation Area and adjacent to the boundary of the Cathedral Quarter Conservation Area. It has Grade II Listed Buildings to its south-west and north-east and lies opposite the Grade I Cathedral Church of St Peter. The scale and design of new development should respond sensitively to the surrounding historic context, and safeguard the character and setting of the Conservation Areas at Little Germany and the Cathedral Quarter and of the surrounding Listed Buildings (including St Peter’s Cathedral)”.</p> <p>(2) Design – Add an additional bullet-point along the following lines:- “The layout and scale of the buildings should respond to the sloping nature of the site. It is likely that lower buildings will be most appropriate on the upper slopes”</p> <p>CH/1.11 - This site lies opposite the boundary of the Little Germany Conservation Area. Therefore we welcome the Design requirements set out for this site.</p> <p>CH/.12 - Conditioning House is a Grade II Listed Building. Subject to the amendment set out below, we warmly welcome the encouragement for the reuse and adaptation of this building and support the Design requirements for this site.</p> <p>Whilst there may be potential for a multidecked car park on the northern part of the site, it should be made clear that this would only be permitted where it is compatible with safeguarding the setting of the Listed Building.</p> <p>Suggested Change - Design, fourth bulletpoint amend to read:-</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p>	<p>No action taken at this time.</p> <p>No action taken.</p> <p>No action taken at this time.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>“Subject to demonstrating that it would not harm the significance of the Listed Building, there could be an opportunity ... etc”</p> <p>CH/1.13 - Midland Mills is a Grade II Listed Building. We warmly welcome the encouragement for the reuse and adaptation of this building and support the Design requirements for this site.</p>	Noted.	No action taken.
	<p>Craig Blatchford Partner Montagu-Evans On behalf of James Honeyman Senior Asset Manager Mary Street Estate Ltd (British Land PLC)</p>	<p>CH/1.2 - The Site is currently subject of a live planning application (15/05725/MAF) for demolition and comprehensive redevelopment to provide Class D2 and Class A3 floorspace with associated car parking, pedestrian routes and landscaping. Prior to submission of the application and during this determination period, we have been (and continue to be) involved in extensive discussions with officers at the Council and our comments put forward in this representation reflect these discussions and the further information now available on, inter alia, physical constraints which affect the Site’s development potential.</p> <p><u>Points for Discussion</u></p> <p>On the whole, we are supportive of the Site’s inclusion in the AAP as an allocated site for “Leisure-led Mixed Use” (CH/1.2) However, we recommend a number of minor revisions are made to the current wording of the Site Allocation to better reflect the proposals subject of the live application as well as the discussions with officers and statutory consultees which have been undertaken so far. It is clear that the Site occupies a prominent and strategically important location within the City Centre which has the potential to deliver material benefits including improved linkages between Forster Square Retail Park, Forster Square Station and The Broadway. Bringing forward the development of the Site expediently will act as a further physical landmark of the City Centre’s regeneration and potentially act as a catalyst for further development. Conversely, were the Site to remain undeveloped and continue to deteriorate, it would present very negatively at an important City Centre gateway. Therefore, we consider that it is important to ensure that the proposed Site Allocation positively encourages the regeneration of the site and reflects all relevant material considerations.</p> <p><u>The extent of the site allocation</u></p> <p>The site boundary includes land outside of our client’s control, notably the Forster Square Rail Station Car Park and the Westfield site compound at Forster Court. Whilst it is acknowledged that redevelopment proposals for the Site should have due regard to the rail station car park and the Westfield site compound as part of a comprehensive approach to</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness minor changes could be made to incorporate the suggested changes.</p>	No action taken at this time.

LITTLE GERMANY AND CATHEDRAL QUARTER				
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		<p>regenerating and improving the area as a whole, it is unlikely that a single comprehensive proposal will come forward, due to the ownership issues and different priorities/timescales. That said, it is agreed that any proposals for the Site should not be considered in isolation and wherever practicable positively plan for, and at the very least not prejudice, the delivery of rail station car park and the Westfield site compound. This is the approach adopted by the current planning application. We therefore agree that the development of the Site should be considered in conjunction with the rail station car park and Westfield site compound and that any planning application should demonstrate how the Site positively relates to these other sites. However, we disagree that this should be led by a masterplanning exercise not only because of the different ownerships involved which has the potential to prejudice the delivery of the greater part of the Site Allocation but also the delay to securing the regeneration of the site that would inevitably arise from a requirement to prepare a master plan.</p> <p><u>Building layout</u></p> <p>A criteria of the proposed Site Allocation is that new buildings should define the edge of the route and respond positively to the corners of Valley Road where it meets Lower Kirkgate and St Blaise Way. The Site is currently constrained by an underground culverted mains drain running from north to south and the subterranean Bradford Beck which cuts across the south-eastern corner of the Site (See Appendix 1 taken from the Design and Access Statement for application 15/05725/MAF). Even in the event that Yorkshire Water would enter into a build over agreement allowing for buildings to be positioned over the mains and/or Bradford Beck it would extend very significantly the programme for bringing forward any development and materially increase construction costs undermining commercial viability and scheme deliverability. From recent discussions, we understand that Officers at the Council have raised the potential to position buildings over the water mains etc directly with Yorkshire Water in relation to application 15/05725/MAF and have been advised that Yorkshire Water will not support such. Having regard to the physical site constraints and the aspiration to deliver the successful regeneration of a key site in the city centre within a realistic timeframe, we consider that flexibility should be applied to the wording proposed in the Site Allocation in respect of the siting of the building whilst acknowledging the importance of views into and out of the Site.</p> <p><u>St Blaise Way, Valley Road and Lower Kirkgate</u></p> <p>The proposed Site Allocation suggest that active ground floor frontage and improvements to the public realm should be provided on the key routes of St Blaise Way, Valley Road and Lower Kirkgate. The proposed Site Allocation also supports improvements to pedestrian and cycle links</p>		

LITTLE GERMANY AND CATHEDRAL QUARTER				
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		<p>within and through the Site Allocation to help connect the development to the surrounding area and encourage walking and cycling.</p> <p>In keeping with the proposed Site Allocation, the current application proposes significant public realm improvements including dedicated pedestrian and cycle routes. By way of example, at the specific request of the City Council, the current application proposes a new designated cycle lane along the eastern part of the Site alongside Valley Road as part of the wider Route 66 Cycle Lane and a "straight line" route through the site linking The Broadway with Forster Square Station and the Retail Park beyond. The current application also demonstrates how the layout of the buildings can enhance the public realm and provide active frontages. Notwithstanding, as a result of the constraints imposed by the existing services running through the site which effectively rule out any buildings directly fronting Canal Road, Valley Road and Lower Kirkgate, as well as the Council's desire to include a length of the Route 66 cycle route to the site frontage, providing active ground floor frontages directly on the northern, eastern and southern boundaries of the Site is not possible. We therefore suggest that this is removed from the Site Allocation.</p> <p><u>Car Parking</u></p> <p>We respectfully suggest that car parking provision should be based on development specific parking demand considerations, including tenant requirements, and having regard to the relationship of the Site with the Train Station and other destinations (e.g. The Broadway and Forster Square Retail) to ensure a commercially and operationally viable scheme. Therefore, whilst in principle we agree that the level of car parking provision should have regard to the Council's maximum standards provision should be assessed on development specific evidence. Notwithstanding it is accepted that an objective of the Council will be to ensure that car parking on the Site operates efficiently and in continuity with other car parks within the City Centre. Therefore, we suggest that the Site Allocation be revised to include a car park management plan as a requirement of any scheme to ensure best practice and continuity with the car parking strategy throughout the City Centre.</p> <p><u>Retail Use</u></p> <p>It is our client's intention to deliver a leisure-led scheme on the Site in accordance with the current planning application. However, given the strategic importance of the site and the regeneration imperative, we consider it is good planning practice to provide flexibility in the development potential of the Site in the event that there is a material change in circumstances which would render a leisure led scheme undeliverable. Given the Site's location between The Broadway and Forster Square Retail Park, we consider that Class A1 retail would be an appropriate alternative or additional use. As such, we suggest that the</p>		

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		<p>proposed use for the Site Allocation is retitled to "Leisure / Retail Mixed Use". This would be consistent with Policy SL1 - Retail Development of the Publication Draft City Centre AAP which states that "New retail development (use class A1) within Bradford City Centre will be primarily directed towards the identified Primary Shopping Area or to sites which adjoin that." The Site adjoins the Primary Shopping Area on its southern and western boundary and therefore the principle of retail on the Site is supported through the general policies of the AAP and we suggest that the Site Allocation reflects this.</p> <p>Suggested Change –</p> <p>Site Size: 1.88ha Existing Use: Vacant Royal Mail Sorting Office Proposed Use: Leisure/ Led Retail Led Mixed Use Estimated Delivery: 2015 - 2020</p> <p>Design</p> <ul style="list-style-type: none"> • Development of the Sorting Office site should be considered in conjunction with the adjacent rail station car park and the Westfield site compound at Forster Court. As more than one ownership is involved, it may not be possible for a comprehensive development to come forward under a single planning application. Individual applications for constituent parts of the site should demonstrate how they contribute to the wider strategic objectives of the site. • Any scheme should improve north-south pedestrian links between the central shopping area/Broadway and the Forster Square Retail Park and railway station • The potential of creating east-west routes between the Cathedral Quarter and station should also be explored • Where possible, new buildings should define the edge of the routes and should respond positively to the corners of Valley Road where it meets Lower Kirkgate and St.Blaise Way. It is recognised that site constraints will influence the position of buildings on the site. • Active ground floor frontages and improvements to the public realm should be provided, including where possible on the key routes of St Blaise Way, Valley Road and Lower Kirkgate having regard to delivering other objectives such as improved pedestrian and cycle routes. • The site is located between two Conservation Areas and adjoins the Grade II Listed Midland Hotel • The scale of new development should respond to the surrounding historic context of the Cathedral Quarter and the Midland Hotel • The wall of the former Midland Railway Station should be incorporated / retained as part of any scheme • New high quality public realm should be delivered through the redevelopment of the site to create a new gateway location for the city 		

LITTLE GERMANY AND CATHEDRAL QUARTER				
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		<p>linked to the enhancements to Forster Square station.</p> <p>Transport</p> <ul style="list-style-type: none"> • The site is located in the city centre and therefore any proposed redevelopment would be required to minimise traffic generation and incorporate a travel plan. • Development proposals should be accompanied by Transport Statement detailing access and service arrangements and connectivity to the wider highway network. The existing site entrances into the car park on Canal Road would need to be closed and St. Blaise Way should be considered as a sole access/ egress for the development. • 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. • The level of car parking provision should be based on the specific requirements of the development proposed having regards to the maximum parking standards in the Local Plan Appendix 4. Due to the site's location the developer would be expected to justify any level of long duration parking provision. The development should make provision for some short stay public parking. A car parking management plan should be secured. <p>Floodrisk</p> <p>The site is currently located within Flood Zone 3a. Any planning application on this site must be supported by a site-specific Flood Risk Assessment.</p>		
	<p>Ian Sanderson Principal Archaeologist West Yorkshire Archaeology Service</p>	<p>CH/1.2 - Part of this site may contain pockets of important and significant archaeological remains from the post-medieval period to the 18th century, depending upon whether new build on a different footprint to the existing building is envisaged.</p> <p>CH/1.3 - This site may contain pockets of important archaeological remains from the medieval period to the 18th century. The listed building may need archaeological recording in advance of further conversion.</p> <p>CH/1.9 - This site may contain pockets of important archaeological remains from the medieval period to the 18th century.</p> <p>CH/1.10 - This site may contain pockets of important archaeological remains from the medieval period to the 18th century.</p> <p>CH/1.12 - This listed building would require archaeological recording prior to further conversion.</p> <p>CH/1.13 - The mill (which is listed) would require archaeological recording before conversion.</p>	<p>Noted.</p> <p>The potential of archaeological remains shall be incorporated into the allocation statements of the sites highlighted in the representation.</p>	<p>No action taken at this time.</p>

LITTLE GERMANY AND CATHEDRAL QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required

SHOPPING AND MARKETS NEIGHBOURHOOD				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Anne Morgan	<p>I wish to express my opinion on the proposed re-development of site M/1.4 the former Yorkshire Building Society (High Point) site.</p> <p>As a local resident, I would welcome redevelopment of this site. However, i would like it stipulated that the planning consent must include the following:</p> <p>a) The current building creates a "wind tunnel" effect. This is a severe problem for local residents. At high winds, I have witnessed the sight of elderly people clinging to the electricity box on the street and requiring rescuing. I have had to assist neighbours across the street, at times, as they have not felt safe without someone to cling to. In extreme is, and that is more frequent than ever, the area has to be avoided and the long way around taken. There are times when I will not walk near the building, This is not appropriate for elderly and low mobility neighbours. Assorted items including headware are blown into the road causing hazards, Given the increase of children expected in the area, there is a great risk of a child chasing a blown item onto a very busy arterial road. As the development plans are eager to promote public transport, it should be noted that in order to use the buses, people have to cross from the retail area into the hazard zone created by that building. I therefore request, thats there is an unconditional requirement as part of the re-development that the "wind tunnel" effect is dealt with and effectively removed for the safety of all concerned.</p> <p>b) The current building is an eyesore. It occupies a large space in the skyline of the city. If it is also not in keeping with the traditional architecture on that side of Westgate and down into the Goitside area. I therefore wish it to be a planning requirement that the exterior, at the very least, is subject to cladding that is more visually acceptable and in keeping with the surrounding area.</p>	<p>Noted.</p> <p>There are a number of policies relating to the design of developments within the City Centre contained within Built Form Chapter. Policy BF2 specifically relates all proposals for tall buildings within the city centre and contains a number of criteria to ensure they do not have a detrimental impact.</p>	No action taken.
	<p>Ian Smith</p> <p>Historic Environment Planning Adviser (Yorkshire)</p> <p>Historic England</p>	<p>We support the Vision for this Neighbourhood especially the role played by the greater number of residential premises above retail units, the conservation and enhancement of the area's historic streets and better connections to neighbouring communities.</p> <p>With the potential change to the retail economy of this area that is likely to result from the Broadway Shopping Centre, we would agree that there is a need for this area to review and adapt its past roles and functions.</p>		

SHOPPING AND MARKETS NEIGHBOURHOOD				
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		<p>This Section provides a good overview of the range of heritage assets found in this part of the City, the elements that are particularly distinctive and the opportunities offered by some of the proposed development sites.</p> <p>Spatial Framework - This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decisionmaker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for the Shopping and Markets Neighbourhood. Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p> <p>Suggested Change - Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account. This Policy should be based upon the Spatial Framework set out on pages 48 and 49.</p>	<p>This section, provides a framework for the sub area which builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council considers that the Central Business and Leisure Neighbourhood Spatial Framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council disagree this section requires an additional policy as , in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p>	<p>No action taken.</p>
		<p>Allocations - The Allocations in this Section set out a number of detailed development requirements which those proposing</p>	<p>NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land,</p>	<p>No action taken.</p>

SHOPPING AND MARKETS NEIGHBOURHOOD				
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		<p>development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p> <p>Suggested Cahnge - Add to the end of the above Policy:- “Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</p> <p>M/1.1 - This site has been amended from that which was included in the Issues and Options Consultation. The key change is that it no longer includes any Listed Buildings nor does any of it lie within the City Centre Conservation Area.</p> <p>As a result, the Design requirements will need some amendment to reflect the changed boundaries of this Allocation.</p> <p>The redevelopment of this area may be one of the few opportunities to encourage the reuse of the remains of the former Simes Street Chapel (Fountain Hall) which is a Grade II Listed Building. Consequently, the site should be extended to include this building.</p> <p>Suggested Change – (1) Amend the boundary of site M/1.1 to include the Grade II Listed Fountains Hall (Simes Street Chapel). (2) Design, first bulletpoint amend to read:- “The site lies adjoins the boundary of the City Centre Conservation Area. The site includes the remains of the Grade II Listed Simes Street Chapel (Fountains Hall). The United Reform Chapel, to the west of this site, is also Listed.”</p> <p>M/1.2 - This site adjoins the boundary of the City Centre Conservation Area. 32 Manor Row (to the south of this site) is a Grade II Listed Building.</p> <p>Consequently, we welcome the design requirements for this site, especially that:-</p>	<p>and provide detail on form, scale, access and quantum of development where appropriate</p> <p>It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs.</p> <p>The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed Shipley site allocations as drafted are sound and the proposed change is not required to make the plan sound.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted.</p>	<p>No action taken at this time.</p> <p>No action taken.</p>

SHOPPING AND MARKETS NEIGHBOURHOOD				
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		<p>Development should respond sensitively to the surrounding historic context and safeguard the character and setting of the nearby Listed Building.</p> <p>Carlton House should be retained as part of the scheme and any new buildings respond sensitively to it.</p> <p>M/1.3 - The Register Office on the southern side of Middle Street is a Grade II Listed Building. This site also lies within the City Centre Conservation Area. The presence of these heritage assets should be referred to as part of the site description. The need to ensure that the development of this site conserves those elements which contribute to the significance of these assets should be better articulated in the design principles.</p> <p>Suggested Change - Design – Amend the third bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context and safeguard the character and setting of the adjacent Listed Building.”</p> <p>M/1.4 - This site lies between the City Centre Conservation Area and the Goitside Conservation Area. We welcome the Design requirement that, if the building is redeveloped, that the scale and design of the building should respond more appropriately to the surrounding historic context and townscape.</p> <p>M/1.5 - The site lies within the Goitside Conservation Area. We support the design principles set out for this site the scale and form of new buildings should respond to the existing character of the area, in particular the way the buildings step up the hillside.</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted.</p> <p>Noted.</p>	<p>No action taken at this time.</p> <p>No action taken.</p> <p>No action taken.</p>
	<p>Ian Sanderson</p> <p>Principal Archaeologist</p> <p>West Yorkshire Archaeology Service</p>	<p>M/1.1 - This site may contain pockets of important and significant archaeological remains from the medieval period to the 18th century. If directly affected by development, the listed chapel may require recording in advance of development.</p> <p>M/1.4 - The small, unbuilt-on area of the site may contain pockets of important archaeological remains dating from the medieval period to the 18th century.</p> <p>M/1.5 - This site may contain pockets of important and significant archaeological remains from the medieval period to the 18th century.</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to clarify any potential archaeological issue on these sites.</p>	<p>No action taken at this time.</p>

GOITSIDE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ann Morgan	<p>I wish to register my concern regarding the City Centre Area Action Plan. Specifically, with relation to V1.4- the redevelopment of Wigan Street Car Park.</p> <p>I am a tenant on Longlands Street, and live in an end property next to the car park, so will be directly effected. As yet, I am unaware of anyone consulting us on the issue. My opposition to the re-development of the site is as follows.</p> <p>a) We were forced to move from Chain Street across to these flats. Living on the Square, we had greenery front and rear of the properties and open space. Here our only view of greenery and space is thanks to the car park and the trees around it, along with the unhindered view of the small piece of grass on the Westgate end. Also, from my kitchen, I can see across the tops of the buildings out to the moors, with the new building, we will have no view, no greenery, and no space to breath.</p> <p>b) Perhaps, you could advise me of whether my rights with regard to "Ancient Lights" will be infringed through this development.</p> <p>c) Many of my neighbours suffer with very little natural light, as a consequence of further development this could well be reduced further.</p> <p>d) Given that a considerable number of my neighbours are elderly and/or housebound, the "hemming in" and closure of the space, and removal of greenery will feel suffocating and reduce the quality of life.</p> <p>e) The impact which I feel I would suffer, and my neighbours, will be detrimental to health and I feel requires a health impact assessment, if you are considering proceeding with the development..</p> <p>f) Currently, we have no parking with the properties, and rely on the car park for our visitors and in particular carers to carry out their duties. With no parking available, this will become a major issue.</p> <p>g) Cars do use the car [park, and at certain times the car park is near capacity. For instance, when events are on , and when City has a home game. If this car park is removed, then we will probably be facing the consequences of illegal parking preventing people from having free egress from their homes.</p> <p>Please do not re-develop this site.</p> <p>Having just seen the proposal, I have provided you with my initial thoughts. Should I, on reflection, realise other issues I will, of course, forward them to you.</p>	<p>Noted.</p> <p>The Council is proposing a number of green infrastructure key interventions through Policy M6, which will deliver enhanced GI throughout the City Centre.</p> <p>There are a number of policies within the AAP and Core Strategy which ensure the design of any new development does not have a significant impact upon residential amenity. In regards to the right to a view, this is not considered a planning issue.</p> <p>In regards to the issue of health, a Health Impact Assessment of the AAP has been undertaken.</p> <p>In regards to car parking, there are a number of car parks within close proximity of the site such as the multi-storey Westgate Car Park at the Oastler Centre and the NCP on Thornton Road. There are also a number on street car parking spaces throughout the Goitside Neighbourhood.</p>	No action taken.

GOITSIDE				
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	Anne Morgan	<p>Further to my previous email, below. I am minded to think, with regard to the proposed re-development of V1.4 Wigan Street Car Park, that as you are also proposing a large number of residential, and residential led developments in the Goitside area, along with increased retail and residential developments on the otherside of Westgate, then there will surely be an increased need for this very car park.</p> <p>Therefore, there is even more reason to not go ahead with the proposed change of use and retain the existing car park.</p>	<p>There are a number of car parks within close proximity of the site such as the multi-storey Westgate Car Park at the Oastler Centre and the NCP on Thornton Road. There are also a number on street car parking spaces throughout the Goitside Neighbourhood.</p>	No action taken.
	<p>Ian Smith</p> <p>Historic Environment Planning Adviser (Yorkshire)</p> <p>Historic England</p>	<p>Goitside Vision - This is the Vision for the Shopping and Markets area.</p> <p>Goitside Character and Built Form - This Section provides a good overview of the range of heritage assets found in this part of the City, the elements that are particularly distinctive, its urban form and the opportunities offered by some of the proposed development sites.</p> <p>Goitside Spatial Framework - Once corrected, this Section will include a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for Goitside. Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p> <p>Suggested Change - Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account. This Policy should be based upon the Spatial Framework set out on pages 57 and 58.</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to correct factual errors.</p> <p>Noted</p> <p>This section, provides a framework for the sub area which builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council considers that the Goitside Neighbourhood Spatial Framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council disagree this section requires an additional policy as , in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p>	<p>No action taken at this time.</p> <p>No action taken.</p> <p>No action taken.</p>

GOITSIDE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p> <p>Suggested Change - Add to the end of the above Policy:-</p> <p>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</p> <p>V/1.1 - The site adjoins the boundary of the Goitside Conservation Area. Therefore we welcome the Design requirement that the scale and design of new development should respond sensitively to the surrounding historic context and that development should repair the urban structure by following the historic building line.</p> <p>V/1.5 - The site lies within the boundary of the Goitside Conservation Area. Therefore we welcome the Design requirement that:- <ul style="list-style-type: none"> ☐☐The scale and design of new development should respond sensitively to the surrounding historic context ☐☐Development should repair the urban structure by following the historic building line ☐☐The scale of the buildings should contribute to the character in Goitside of stepping up the valley side on the northern side of Thornton Road ☐☐New buildings should respond positively to the alley which runs through the site and the goit </p> <p>V/1.7 - This site lies within the Goitside Conservation Area. Colonial Buildings adjacent to its north-eastern corner are Grade II Listed. In line with the approach adopted elsewhere, the need for any development to safeguard the character and setting of these heritage assets should be referred to as part of the site description.</p> <p>Suggested Change - Design Requirements, add the following additional bullet-point:- “The site lies within the Goitside Conservation Area and there is a Grade II Listed Building adjacent to its northeastern corner. The scale and design of new development should respond sensitively to the</p>	<p>NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate</p> <p>It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs.</p> <p>The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed Shipley site allocations as drafted are sound and the proposed change is not required to make the plan sound.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p>	<p>No action taken.</p> <p>No action taken.</p> <p>No action taken.</p> <p>No action taken at this time.</p>

GOITSIDE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>surrounding historic context and safeguard the character and setting of the adjacent Listed Building”</p> <p>V/1.8 - 8 to 24 Quebec Street, to the east of this site, are Grade II Listed Buildings. The site also adjoins the boundaries of the City Centre and Goitside Conservation Areas.</p> <p>In line with the approach adopted elsewhere, the need for any development to safeguard the character and setting of these heritage assets should be referred to as part of the site description.</p> <p>Suggested Change - Design Requirements, add the following additional bullet-point:-</p> <p>“There is a group of Listed Buildings aligning the site’s eastern edge and it adjoins the boundary of both the Goitside and City Centre Conservation Areas. The scale and design of new development should respond sensitively to the surrounding historic context and safeguard the character and setting of the adjacent Listed Buildings”</p> <p>V/1.9 - Sunwin House is a Grade II Listed Building. It also lies within the City Centre Conservation Area. Therefore we support the design principles that any scheme should involve the conversion and reuse of this building.</p> <p>V/1.10 - The site adjoins the boundary of the Goitside Conservation Area. In line with the approach adopted elsewhere, the need for any development to safeguard the character and setting of this area should be referred to as part of the site description.</p> <p>Suggested Change - Design Requirements, add the following additional bullet-point:-</p> <p>“The site adjoins the boundary of the Goitside Conservation Area. Any redevelopment of this area should respond sensitively to the surrounding historic context”</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p> <p>Noted.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p>	<p>No action taken at this time.</p> <p>No action taken.</p> <p>No action taken at this time.</p>
	<p>Ian Sanderson</p> <p>Principal Archaeologist</p> <p>West Yorkshire Archaeology Service</p>	<p>V/1.9 - The unbuilt-on part of the site may contain pockets of important archaeological remains dating from the medieval period to the 18th century. The listed building may require archaeological recording prior to further conversion.</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to clarify any potential archaeological issues on this site.</p>	<p>No action taken at this time.</p>

LEARNING QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Ian Smith</p> <p>Historic Environment Planning Adviser (Yorkshire)</p> <p>Historic England</p>	<p>We support the Vision for the Learning Quarter particularly the intention that, by 2030 the Campus and City Centre will be brought closer together.</p> <p>The University is not only completely divorced from the centre of the city but also has little presence from the City Park. Other Cities have demonstrated how the expansion of a university campus at the heart of a City can be used to regenerate/revitalise other parts of that settlement.</p> <p>This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for the Learning Quarter Neighbourhood Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p> <p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p> <p>Suggested Change - Add to the end of the above Policy:- “Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</p>	<p>This section, provides a framework for the sub area which builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council considers that the Learning Quarter Neighbourhood Spatial Framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council disagree this section requires an additional policy as , in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p> <p>NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate</p> <p>It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs.</p> <p>The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed Shipley site allocations as drafted are sound and the proposed change is not required to make the plan sound.</p>	<p>No action taken.</p> <p>No action taken.</p>

LEARNING QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required

SOUTHERN GATEWAY				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Ian Smith</p> <p>Historic Environment Planning Adviser (Yorkshire)</p> <p>Historic England</p>	<p>This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account. However, it is unclear what status these requirements are meant to have.</p> <p>Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for the Southern Gateway.</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p> <p>Suggested Change - Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account. This Policy should be based upon the Spatial Framework set out on page 77.</p> <p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p> <p>Suggested Change - Add to the end of the above Policy:-</p>	<p>This section, provides a framework for the sub area which builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council considers that the Southern Gateway Neighbourhood Spatial Framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council disagree this section requires an additional policy as , in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p> <p>NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate</p> <p>It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs.</p> <p>The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed Shipley site allocations as drafted are sound and the proposed change is not required to make the plan</p>	<p>No action taken.</p> <p>No action taken.</p>

SOUTHERN GATEWAY				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		"Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations"	sound.	

POLICY CL1: HOUSING				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	<p>Para 4.20 - Given the number of Listed Buildings in the City Centre and the amount of currently-underused floorspace which could, potentially, be reused/adapted for residential purposes, we welcome the acknowledgement that conversion of historic buildings will be one of the main sources of housing supply in the City Centre.</p> <p>It is presumed that line 5 of the first Paragraph should refer to "conversion" rather than "conservation".</p> <p>CL1 (B) - We support the intention to encourage greater use to be made of vacant and underused upper floors within the City centre. Such an approach not only encourages a greater level of activity in the heart of the City throughout the day (and thereby adds to these area's vitality and viability) but it also encourages greater investment in the properties (which is particularly important for historic buildings).</p> <p>CL1 (E) - We support the intention to allow lower densities than proposed in this Criterion if local circumstances demand it. This would help to ensure that new residential developments safeguard the distinctive character of the various parts of the City centre within which they are developed.</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could to correct any factual errors.</p> <p>Noted. The Council welcomes Historic England's support.</p> <p>Noted. The Council welcomes Historic England's support.</p>	<p>No action taken at this time.</p> <p>No action taken.</p> <p>No action taken.</p>

POLICY CL2: FLOOD RISK				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Bev Lambert Environment Agency	<p>Policy CL2: Flood Risk</p> <p>The wording of this policy is quite clumsy and contains errors, particularly bullet point B, and you may wish to consider reviewing it.</p> <p>The second paragraph of this policy should be expanded to include reference to the exception test as required by the NPPF. Table 3 of the PPG shows when the exception test is required – ie highly vulnerable uses in flood zone 2 and more vulnerable uses in flood zone 3 (note that highly vulnerable uses are not appropriate in flood zone 3, such uses include basement dwellings amongst others). It is noted that paragraph 4.30 mentions the exception test, but we consider it appropriate to include it in the policy itself.</p> <p>Currently, the policy refers to the need for a site-specific FRA, which is just one of the elements</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness, minor changes could be made to incorporate these suggested changes.</p>	<p>No action taken at this time.</p>

POLICY CL2: FLOOD RISK				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		required under the NPPF. All proposals in flood zones 2 and 3 will require a site specific FRA. Bullet point B – we recommend the addition of ‘taking into account climate change’ after ‘lifetime of the development’. Bullet point B.2.v. refers to ‘criterion 4a’ but there is no indication of what this is. This needs to be explained.		

POLICY CL3: ACTIVE FRONTAGES AND COMMUNITY PROVISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	We support the requirement that new build developments and conversion of buildings within the City Centre should have active frontages at ground floor levels. This will help to sustain the vitality and attractiveness of the area.	Noted. The Council welcomes Historic England’s support.	No action taken.

POLICY CL4: PRIMARY AND SECONDARY EDUCATION PROVISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	We support the encouragement of new schools within the City Centre). This will help encourage more people to make use of and visit the City Centre. This will not only help to create vibrancy in the heart of the City but also reduce the numbers of vehicular trips across Bradford	Noted. The Council welcomes Historic England’s support.	No action taken.

POLICY SL1: RETAIL DEVELOPMENT				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

POLICY SL2: PRIMARY AND SECONDARY FRONTAGES				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	Figure 12 - Given the uses currently occupying the majority of premises along the southern part of Ivegate, it is questionable whether this street should be defined as a Primary Frontage within the City Centre. Suggested Change - Define the southern part of Ivegate as a Secondary Frontage.	Noted. Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.	No action taken at this time.

POLICY SL3: IMPROVING CONNECTIONS BETWEEN SHOPPING AREAS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

POLICY SL4: CULTURAL ASSETS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	It is clear that from the experiences of other towns and cities around the country that retailing, on its own, is not likely to be enough to deliver a successful, vibrant city centre. Research has shown that successful city centres are those which offer the best "experience". Therefore we welcome the encouragement of the expansion of existing and creation of new cultural and tourist facilities in the City Centre.	Noted. The Council welcomes Historic England's support.	No action taken.
	Ross Anthony Theatres Trust	The Theatres Trust supports proposed Policy SL4: Cultural Assets. The policy reflects guidance in para. 70 of the NPPF relating to the protection and safeguarding of existing cultural facilities, as well as encouraging new facilities.	Noted. The Council welcomes the Theatres Trust's support.	No action taken.

POLICY B1: DEVELOPMENT OF EMPLOYMENT SPACE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

POLICY ED1: PROMOTION OF THE EDUCATION QUARTER				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

POLICY M1: WALKING, CYCLING AND PUBLIC REALM				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	<p>Para 4.84 - We would support the requirement that any development proposals will be assessed against the guidance set out in the Streetscape Design Manual. The creation of attractive public realm is an important component in developing a high-quality shopping and leisure experience and the use of this document should assist this process.</p> <p>Policy M1 - Subject to the amendment set out below, we support this Policy especially those elements which relate to:-</p> <ul style="list-style-type: none"> Facilitating pedestrian movement between key locations including those in the hinterland of the City Centre and public transport facilities Using opportunities [provided by development to redesign the road space to provide a greater focus on pedestrian and cycle movement Identifying the ongoing Heritage Streets Improvement as one of the Councils priority routes within the City Centre Improving the pedestrian and cycle linkages between the two stations. <p>Policy M1 (B) - The Introductory Section of this Area Action Plan highlights the fragmented nature of the City Centre which makes it difficult for pedestrians. However, the AAP does not put forward any proposals to lessen the severance caused by the current highway infrastructure or ways in which</p>	<p>Noted.</p> <p>The Council welcomes Historic England's support.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be</p>	<p>No action taken.</p> <p>No action taken at this time.</p>

POLICY M1: WALKING, CYCLING AND PUBLIC REALM				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>connectivity might be improved. It is particularly important that the plan facilitates easier pedestrian movement between the Learning Quarter and the new residential areas and the heart of the City centre.</p> <p>Suggested Change - Policy M1 Criterion B add an additional sub – Criterion under B identifying those areas where the City council will actively seek to lessen the severance caused by the existing highway system and improve pedestrian and cycle linkages between the City Centre and key areas outside it. These should be identified on the Proposals Map</p>	made to incorporate this suggested change.	

POLICY M2: PUBLIC TRANSPORT SERVICES AND INFRASTRUCTURE (INCLUDING TAXIS)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	Policy M2 (E) - We would fully support the intention to improve people's first impressions of the City when arriving by train, particularly at Bradford Interchange. We would also endorse that any redevelopment of the stations needs to include not just the stations themselves but also the townscape and approaches between them and the City.	Noted. The Council welcomes Historic England's support.	No action taken.

POLICY M3: TRAFFIC, HIGHWAYS AND PARKING				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	<p>Para 4.93 - As this section notes, car parking is spread throughout the City centre in a random manner much of which is poor quality and does not present a very favourable impression of the City. Consequently, we would strongly endorse the development of a Strategy to rationalise the amount of car parking provided across the City centre. A key part of the Strategy should be to improve the visitor experience of the City. Therefore it ought to should set out the expected quality which any car parking facilities should attain. Such an approach has been used in Sheffield City centre.</p> <p>Policy M3 - As this section notes, car parking is spread throughout the City centre in a random manner much of which is poor quality and does not present a very favourable impression of the City.</p> <p>Paragraph 4.93 notes that a parking strategy is currently being undertaken of the City Centre. However, there is no reference to this within Policy M3 or the approach that will be taken to applications for additional car parking provision within the City Centre.</p> <p>Such a Policy should specifically set out that temporary use of land for car parking will only be permitted where it is needed to meet an identified shortage within the City Centre and is compatible with the provisions of the car parking strategy.</p> <p>Suggested Change - Policy M3 include an additional Criterion to the Policy which makes it clear that that temporary use of land for car parking (or the renewal of permissions for temporary car</p>	<p>Noted.</p> <p>The Council welcomes Historic England's support.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.</p>	<p>No action taken.</p> <p>No action taken at this time.</p>

POLICY M3: TRAFFIC, HIGHWAYS AND PARKING				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		parking) will only be permitted where it is needed to meet an identified shortage within the City Centre and is compatible with the provisions of the car parking strategy.		

POLICY M4: IMPACT OF NEW DEVELOPMENT UPON THE TRANSPORT NETWORK				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

POLICY M5: BIODIVERSITY IN THE CITY CENTRE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Tom Keatley Team Leader Natural England	Natural England support policies M5 and M6 re biodiversity and green infrastructure.	Noted. The Council welcomes Natural England's support.	No action taken.
	Lauren Garside Conservation Planning Officer Yorkshire Wildlife Trust	Yorkshire Wildlife Trust welcomes and supports the proposed policy on biodiversity and is pleased to note that all developments within the city centre would be expected to incorporate biodiversity into their design, where viable and feasible to do so. We advise that such enhancements are not just restricted to the projects highlighted to within the policy wording. Structural features such as bat and bird boxes and green/ gravel roofs can provide breeding habitats and shelter for a number of bird, mammal and invertebrate species. Yorkshire Wildlife trust has also reviewed the Ecological Assessment for the Shipley – Canal Road Corridor & Bradford City Centre Area Action Plans produced by West Yorkshire Ecology. We support the ecological enhancement recommendations made in the document, especially the suggested wild flower meadows at Frizinghall and Forster Square stations and advise that this is adopted.	Noted. The Council welcomes Yorkshire Wildlife Trust's support.	No action taken.
	Susan Stead Bradford Urban Wildlife Group	Ecological Proposals: Opening up areas of Bradford Beck acceptable. Like do support the suggestions in the Ecology Assessment for the Shipley – Canal Road Corridor and Bradford City Action Plans by West Yorkshire Ecology regarding Green Roofs within the City Environment (and of course more hanging baskets are important). Support the wildlife haven in the Cathedral grounds. Bradford Forster Square Station Do support a section of meadow – garden????? it is necessary to establish what is there naturally first to decide on future planting. (We would be happy to look at the areas first and make recommendations. However it should be recognised that it is Network Rail and the railway companies who own the stations and they must give permission for any redevelopment of an ecological business.	Noted. Bradford Council welcomes Bradford Urban Wildlife Group's support. The Council will continue to work closer with Network Rail and rail franchise providers in the delivery of the Stations Masterplans and specifically the delivery of ecological improvements.	No action taken. No action taken.

POLICY M6: GREEN / BLUE INFRASTRUCTURE AND OPEN SPACE WITHIN THE CITY CENTRE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Tom Keatley Team Leader Natural England	Natural England support policies M5 and M6 re biodiversity and green infrastructure.	Noted. The Council welcomes Natural England's support.	

POLICY M6: GREEN / BLUE INFRASTRUCTURE AND OPEN SPACE WITHIN THE CITY CENTRE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Bev Lambert Environment Agency	Policy M6: Green/Blue Infrastructure and Open Space within the City Centre We welcome and support the inclusion of this policy. The Green Infrastructure Study identifies the multiple benefits of green and blue infrastructure, for example the use of playing fields as flood storage areas. Such measures will help people and wildlife adapt to the possible future impacts of climate change.	Noted.	

POLICY BF1: THE NATURE OF THE BUILT FORM				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	We support this Policy especially Criterion F relating to the need for development proposals to preserve and enhance the character, appearance and setting of the heritage assets of the AAP and to the requirement for development proposals to have regard to the adopted Conservation Area Appraisals. Bradford has a particularly distinctive City Centre and, unique amongst most of the Cities in the north, a building material which is used consistently across the City (certainly up to the 1950s anyway).	Noted. The Council welcomes Historic England's support.	No action taken.
	Lauren Garside Conservation Planning Officer Yorkshire Wildlife Trust	Yorkshire Wildlife Trust welcomes and supports the proposed policy on green/ blue infrastructure. We advise that all blue/ green infrastructure is managed and designed to provide net gains in biodiversity. The Town and Country Planning Association has produced guidance on how green infrastructure can be designed for biodiversity, which can be found on the link below: http://www.tcpa.org.uk/data/files/TCPA_TWT_GI-Biodiversity-Guide.pdf	Noted. The Council welcomes Yorkshire Wildlife Trust's support.	No action taken.

POLICY BF2: TALL BUILDINGS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	Subject to the amendment below, we support this Policy which should help to ensure that any new tall buildings compliment rather than detract from the character of the City Centre. We particularly welcome the requirement that tall buildings should:- ☑☑Respect and/or enhance the skyline, key views, vistas and landmarks ☑☑Have a positive relationship with the surrounding context including the scale of buildings in historic areas and the City's natural bowl topography. It would be helpful to users of the document if the AAP identified what were considered to be the key buildings, views and vistas to which tall buildings ought to have regard. Suggested Change - The AAP should include a figure which identifies the key buildings, views and vistas which are of especial importance to the distinctive character of Bradford City Centre and which, therefore, would particularly fall to be considered under the provisions of Criterion B of the Policy.	Noted. Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.	No action taken at this time.

POLICY BF3: BUILT FORM AND THE ENVIRONMENT

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith Historic Environment Planning Adviser (Yorkshire) Historic England	Para 4.122 – 4.126 - This Section sets out a good overview of the heritage assets within the area covered by this AAP and the important contribution which they make to the distinctive character of the City Centre. More importantly, it alerts users of the Plan to the need for any proposals to have regard the Policy for the historic environment that is set out in the Core Strategy.	Noted. The Council welcomes Historic England's support.	No action taken.
	Bev Lambert Environment Agency	Policy BF3: Built Form and the Environment We welcome the inclusion of bullet point C relating to ground contamination. We would like to see an additional bullet point added to this policy to protect and, where possible, improve controlled waters in line with the objectives of the Water Framework Directive (WFD). WFD objectives are to prevent deterioration of water bodies, to achieve good status in water bodies and to prevent pollutants entering water bodies). The Bradford Beck which crosses parts of the AAP is currently achieving 'poor' status. We suggest: 'Future development proposals will be expected to address the key objectives of the Water Framework Directive and respond to the guidance and recommendations in the Humber River Basin Management Plan.'	Noted. Whilst not considered a matter of soundness a minor change could be made to incorporate this suggested change.	No action taken at this time.

POLICY BF4: DISTRICT HEAT NETWORKS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

IMPLEMENTATION AND DELIVERY				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

EVIDENCE DOCUMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

SUSTAINABILITY APPRAISAL				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		No representations received.		

Appendix 1 – Email and Notification Letter

City of Bradford MDC

www.bradford.gov.uk

Department of Regeneration
Development Plans
2nd Floor (South) Jacobs Well
Nelson Street
Bradford
BD1 5RW

Tel: (01274) 433679

Email: planning.policy@bradford.gov.uk

Date: Monday 14th December 2015

Dear Sir / Madam,

RE: LOCAL PLAN FOR THE BRADFORD DISTRICT

- **Waste Management Development Plan Document**
- **Bradford City Centre Area Action Plan**
- **Shipley and Canal Road Corridor Area Action Plan**

- PUBLICATION DRAFT (REGULATION 18 & 19)

I am writing to you as a statutory consultee or because of your previous interest in the Local Plan for the Bradford District. On 20th October 2015 the Council approved the Development Plans listed above for submission to the Secretary of State for public examination by an independent Planning Inspector. In advance of submission, the Publication Draft Development Plans will be published formally for representations, in line with the relevant Regulations on **Monday 14th December 2015**.

The Development Plans listed above set out proposed sites and policies which will provide the planning policy framework for determining future planning applications in these areas to 2030

Aim of this consultation

This consultation seeks your written representation(s) on the Publication Draft before the Council formally submits the documents to the Government for examination. In particular comments are sought in relation to the ‘**soundness**’ of the plans, including whether the plans have been prepared in accordance with the **legal requirements** and fulfil the **Duty to Co-operate**.

Your comments are invited on these Publication Draft Development Plan Documents during the period of consultation, which runs for 8 weeks until Monday 8th February 2016 (1pm).

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities such as email to make their responses in this way. Representations can be made using the Representation Form available online at www.bradford.gov.uk/planningpolicy or by email to the address planning.policy@bradford.gov.uk

As well as electronic representations the Council will also accept responses by post to Development Plans, City of Bradford Metropolitan District Council, 2nd Floor South, Jacobs Well, Nelson Street, Bradford BD1 5RW

All comments should be with the Council by 1pm on Monday 8th February 2016.

Your personal details and comments cannot be kept confidential and will be published and submitted to the Secretary of State alongside each of the Development Plans for public examination by an independent Planning Inspector.

Any representation submitted may be accompanied by a request to be notified at a specified address of the submission of the relevant Development Plan for independent examination; of the publication of the recommendations of the person appointed to carry out the examination on the Core Strategy; and on the adoption of the Core Strategy.

The Development Plans listed have been subject to the following assessments: Sustainability Appraisal and Habitat Regulations Assessment, Equality Impact Assessment and Health Impact Assessment.

Availability of Documents

All three development plans and supporting documents will be available to view on the Council's website at: www.bradford.gov.uk/planningpolicy.

Reference copies of each Development Plan Document together with the supporting documents listed will be available for inspection at the deposit locations listed below:

Development Plan Documents

- **Waste Management Development Plan Document Publication Draft**
- **Bradford City Centre Area Action Plan Publication Draft**
- **Shipley and Canal Road Corridor Area Action Plan Publication Draft**

Supporting Documents

Sustainability Appraisal
Habitats Regulations Assessment
Equality Impact Assessment
Statement of Representations Procedure
Statement of Consultation
Engagement Plan
Duty to Co-operate Statement

Deposit Locations

- **CBMDC Principal Planning Office: Jacob's Well, Bradford, BD1 5RW.**
- **CBMDC libraries: Bradford Local Studies Library, Bradford City Library, Bingley, Keighley and Ilkley.**
- **Town Halls & One Stop Shops: Shipley, Keighley and *Ilkley (*By appointment only).**

As part of the consultation a number of sessions have been organised where officers will be available to discuss the individual Development Plans and procedures for making representations. The sessions have been organised as follows;

Waste Management Development Plan Document (Publication Draft)

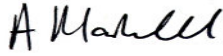
- **6th January 2016 - Keighley Town Hall, Bow Street, Keighley - 3pm to 6pm**
- 8th January 2016 - Shipley Kirkgate Centre, 39a Kirkgate, Shipley - 4pm to 7pm
- 12th January 2016 - Bradford City Library, Centenary Square, 9 Aldermanbury, Bradford - 3pm to 7pm

Bradford City Centre Area and Shipley and Canal Road Corridor Action Plan Development Plan Documents (Publication Draft)

- 7th January 2016 - Shipley Kirkgate Centre, 39a Kirkgate, Shipley - 4pm to 7pm,
- 11th January 2016 - Bradford City Library, Centenary Square, 9 Aldermanbury, Bradford - 3pm to 7pm

Should you have any further queries about the Development Plan Documents consultation process please contact a member of the Development Plans team by E-mail on planning.policy@bradford.gov.uk or telephone (01274) 433679.

Yours faithfully,

A handwritten signature in black ink that reads "A Marshall". The signature is written in a cursive style with a large initial 'A'.

Andrew Marshall
Planning & Transport Strategy Manager

Appendix 2 - List of Media and Press Releases relating to the Consultation

The council issued a press released in December 2015 (below), inviting interested parties to comment on the AAPs

“People are invited to have their say over the coming weeks on a series of Local Plan documents being drawn up by Bradford Council.

Public consultation is about to begin on several documents including that Bradford City Centre Area Action Plan (AAP), Shipley & Canal Road Corridor AAP, and Bradford District Waste Management Plan Development Plan Document (DPD) as well as the Bradford District Community Infrastructure Levy (CIL).

The consultation starts on Monday 14 December 2015 and lasts until Monday 8 February 2016 for an eight week period.

This is the formal period for representations before the plans are submitted to the Government for independent examination.

The documents plus background material and comment form will be available online at (www.bradford.gov.uk/planning).

Coun Val Slater, Bradford Council Deputy Leader, said: “We want to make sure as many people as possible are fully informed of our plans for the district’s future.”

Bradford Council will be holding drop in exhibitions early next year on the following dates:


6 Jan - Waste Management DPD - Keighley Town Hall, Ground Floor Room 3pm to 6pm.

7 Jan - AAP's Shipley Kirkgate Centre 4pm to 7pm.

8 Jan - Bradford City Centre AAP and Shipley & Canal Road Corridor AAP – Shipley, Kirkgate Centre 4pm to 7pm.

11 Jan - Bradford City Centre AAP and Shipley & Canal Road Corridor AAP - Bradford City Library - space in library available, 3pm to 7pm.

12 Jan - Waste Management DPD - Bradford City Library - space in library available 3pm to 7pm.”



Chance to discuss plans for the area

BRADFORD Council is running drop-in events across the district as part of a consultation over its Local Plan documents.

The first will be on January 6 for the Waste Management Development Plan Document (DPD) at Keighley Town Hall, Ground Floor Room, 3pm-6pm.

On January 7 the Bradford City Centre Area Action Plan and Shipley & Canal Road Corridor Area Action Plan will be at Shipley Kirkgate Centre, 4pm-7pm, and on January 11 at Bradford City Library, 3pm-7pm.

The Waste Management DPD will be on view on January 8 at Shipley, Kirkgate Centre from 4pm-7pm and on January 12 at Bradford City Library from 3pm-7pm.

Bradford City Centre Area Action Plan and Shipley & Canal Road Corridor Area Action Plan

The Council is currently preparing development plans for Bradford City Centre and Shipley and Canal Road Corridor, the two key regeneration areas for housing and economic growth within the District.

The Council's Executive Committee gave approval for public consultation on the Publication Draft versions of these plans on 13th October 2015. This was followed by approval at meeting of Full Council on 20th October 2015.

Public consultation on each Area Action Plan will commence in December 2015 for eight weeks. All those customers currently on the Local Plan database will automatically receive a separate notification at the start of this consultation with details of where to find the documents and how to make comments.

For further information on either Area Action Plan, please visit our website at: www.bradford.gov.uk/planningpolicy then click on 'Development Plan Documents'.

Appendix 3 - Summary of main issues raised through representations

General Comments
<ul style="list-style-type: none">• Lack of convenience retail offer within the City Centre;• Increase in City Centre living could lead to a significant impact upon Policing resources;• Concerns regarding the boundary of the City Centre AAP covering Drewton Road and Darfield Street / Lumb Lane area due to lack of connectivity;• 6,000 jobs target could result in a severe impact upon the Strategic Road Network;• Concerns regarding the flood risk potential of City Centre sites following the Boxing Day 2015 floods.
Vision
<ul style="list-style-type: none">• Broad support for the Vision for the City Centre put forward in the AAP, specifically the aspirations for built environment, connectivity and blue and green infrastructure.
Objectives
<ul style="list-style-type: none">• High levels of support for the Objectives put forward in the AAP, specifically in regards to heritage, biodiversity and public realm.
Central Business and Leisure District
<ul style="list-style-type: none">• Concerns regarding the separation of the University from the rest of the City Centre;• Suggested changes to the Neighbourhood Vision to create a more attractive public realm and pedestrian environment;• Suggested changes to the Neighbourhood Spatial Framework to establish this as a Policy;• Broad support for the Neighbourhood Spatial Framework and development proposals within neighbourhood chapter.
Little Germany and Cathedral Quarter
<ul style="list-style-type: none">• A number of suggested changes regarding exploring potential mineral deposit extraction on proposed allocation sites.• Suggested changes to the Neighbourhood Spatial Framework to establish this as a Policy;• A number of suggested changes regarding design and heritage in allocation proposal statements;• A number of changes suggested to the Royal Mail Sorting Office site (CH/1.2).• A number of changes suggested regarding potential archaeological remains to be investigated on proposed allocated sites;

The Shopping and Markets
<ul style="list-style-type: none"> • Concerns regarding the design and high winds associated with Former Yorkshire Building Society Building (M/1.4). • Suggested changes to the Neighbourhood Spatial Framework to establish this as a Policy; • A number of suggested changes regarding design and heritage in allocation proposal statements; • A number of changes suggested regarding potential archaeological remains to be investigated on proposed allocated sites;
Goitside
<ul style="list-style-type: none"> • Concerns regarding to the loss of car parking through redevelopment of Council Car Parks. • Concerns regarding loss of natural light to existing residents resulting from new development. • Suggested changes to the Neighbourhood Spatial Framework to establish this as a Policy; • A number of suggested changes regarding design and heritage in allocation proposal statements; • A suggested change suggested regarding potential archaeological remains to be investigated on proposed allocated sites;
Learning Quarter
<ul style="list-style-type: none"> • Suggested changes to the Neighbourhood Spatial Framework to establish this as a Policy;
Southern Gateway
<ul style="list-style-type: none"> • Suggested changes to the Neighbourhood Spatial Framework to establish this as a Policy;
City Living and Community Provision
<ul style="list-style-type: none"> • Broad support for the policies contained within the chapter, specifically reuse of upper floors, active frontages and the provision of education infrastructure; • Concerns regarding Policy CL2 and suggested changes to correct errors and make more refined
Shopping and Leisure
<ul style="list-style-type: none"> • Suggested change to the primary frontage allocation for Ivegate; • Broad support for policies relating to retail, leisure and cultural assets within the chapter.

Business
<ul style="list-style-type: none"> • No Comments Received.
Higher and Further Education
<ul style="list-style-type: none"> • No Comments Received.
Movement
<ul style="list-style-type: none"> • Suggested change to Policy M3 restricting the temporary use of vacant sites for car parking only when there is identified need; • Broad support for the policies contain within the Movement chapter, specifically improvements to visitors experience and provision of biodiversity and blue / green infrastructure;
Built Form
<ul style="list-style-type: none"> • Suggested change to Policy BF2 to take account of key vistas and landmark buildings; • Suggested change to Policy BF3 to take account of the Water Framework Directive and the recommendations of the Humber River Basin Management Plan; • Broad support for the policies contained within the Built Form Chapter, specifically relating to heritage and biodiversity, blue and green infrastructure.
Implementation
<ul style="list-style-type: none"> • No Comments Received.
Evidence Base
<ul style="list-style-type: none"> • No Comments Received.
Sustainability Appraisal
<ul style="list-style-type: none"> • No Comments Received.