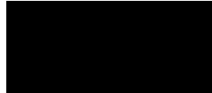


Development Plans ,  
 City of Bradford Metropolitan District Council  
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 Bradford BD1 5RW

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29 January 2016

Dear Sirs,

**The Local Plan for Bradford District – Bradford City Centre Area Action Plan: Publication Draft**

Thank you for consulting Historic England about the Publication Draft of the Bradford City Centre Area Action Plan. We have the following comments to make about the document:-

Page	Section	Sound/ Unsound	Comments	Suggested Change
7	Paragraph 2.5	Sound	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.	-
7	Paragraph 2.7	Sound	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 road-building schemes of that period.	-
9	Paragraph 2.29 et seq	Sound	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	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			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.	
14	Figure 1	Sound	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.	-
14	Figure 1	Unsound	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.	The extent of the Area Action Plan should be reviewed to exclude the area between Drewton Road and Darfield Street/Lumb Lane
18	Vision	Support	We support the Vision especially those aspects which relate to:- <ul style="list-style-type: none"> <li>• The sensitive renovation and reuse of the historic buildings in Little Germany and Giotside for residential and employment purposes.</li> <li>• New build development which has incorporated high-quality design which respects the architectural heritage of the city.</li> <li>• The safeguarding and enhancement of the City's important cultural assets.</li> <li>• The improvements to the two stations and the pedestrian routes</li> </ul>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>between them</p> <ul style="list-style-type: none"> <li>• The creation of new open spaces and public realm improvements.</li> <li>• The intention that the plan will build upon and enhance the existing qualities of this part of the District.</li> </ul> <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>	
17	Action Plan Objectives, Objective 1	Sound	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.	-
17	Action Plan Objectives, Objective 2	Sound	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.	-
17	Action Plan Objectives, Objective 3	Sound	We support this Objective especially the encouragement given to the reuse of the City's architectural heritage and the promotion of high-quality new design.	-
20	Vision for Central Business and Leisure District	Unsound	<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.</p> <p>The Design requirements for Site B/1.6</p>	(1) Vision for Central Business and Leisure District amend to read:- <i>"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"</i>

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>(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>(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>(2) Vision for Central Business and Leisure District amend to read:-  <i>“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”</i></p>
21	Central Business and Leisure District, character and Built form	Sound	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.	-
21	Central Business and Leisure District spatial framework	Unsound	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>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.</p> <p>This Policy should be</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<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 Central Business and Leisure District</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	based upon the Spatial Framework set out on page 21. (See also below)
23 to 28	Central Business and Leisure District Allocations	Unsound	<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>	Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i>
24	B/1.2 No.1 City Park	Sound	<p>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"> <li>• The proposed development will be of high- quality contextual design that responds sensitively to its setting adjacent to the Grade I Listed</li> </ul>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>City Hall and its location within the City Centre Conservation Area.</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Where possible, opportunities should be taken to open up new views of the City Hall.</li> </ul> <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>	
26	B/1.4 Exchange Court	Sound	<p>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"> <li>• Any development should have regard the principles set out in the City Centre Conservation Area Assessment and Conservation Area Appraisal</li> <li>• Proposals should safeguard those elements which contribute to the significance of the adjacent Listed Building</li> </ul> <p>The current cinema complex (The Leisure Exchange) whilst close to 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</p>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			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.	
27	B/1.5 Former Yorkshire Water Depot	Sound	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.	-
28	B/1.6 Former Bradford Odeon, Princess Way	Sound	<p>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.</p> <p>We support the Design proposals for this site especially:-</p> <ul style="list-style-type: none"> <li>• The possibility of retaining elements of the former Bradford Odeon</li> <li>• The requirement for development proposals to respond sensitively to the surrounding Listed Buildings and the City Centre Conservation Area.</li> </ul> <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</p>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			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.	
29	Vision for Little Germany and Cathedral Quarter	Sound	We support the Vision for this Neighbourhood especially the role that the reuse and adaptation of the numerous historic buildings is envisaged to play in delivering large-scale residential uses in this part of the City Centre..	-
30	Little Germany and Cathedral Quarter Neighbourhood, Character and Built form	Sound	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.	-
30	Little Germany and Cathedral Quarter Neighbourhood Spatial Framework	Unsound	<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>	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.



Page	Section	Sound/ Unsound	Comments	Suggested Change
			<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</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	
34 to 46	Little Germany and Cathedral Quarter Neighbourhood Allocations	Unsound	<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>Add to the end of the above Policy:-  <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i></p>
34	CH1/1 Area east of Valley Road	Sound	<p>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>	-
35	CH/1.2 Royal Mail Sorting Office	Sound	<p>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>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<ul style="list-style-type: none"> <li>• Development should respond to the surrounding historic context</li> <li>• The walls of the former Midland Railway Station (which make a considerable contribution to the townscape character of the surrounding area) should be retained.</li> <li>• New high quality public realm should be delivered through the development</li> <li>• The potential for the creation of east-west routes between the Cathedral Quarter and the Station.</li> </ul>	
36	CH/1.3 Cathedral Quarter Phase 1	Sound	<p>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"> <li>• The stone-setted route of Captain Street should be retained and exploited as the focus for development.</li> <li>• 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.</li> <li>• The tower of the former school should remain as a prominent local landmark at the northern end of this site</li> </ul>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
36	CH/1.3 Cathedral Quarter Phase 1, Design, second bullet-point	Unsound	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 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.	CH/1.3 Cathedral Quarter Phase 1, Design, second bullet-point amend to read:- <i>“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”</i>
37	CH/1.4 Cathedral Quarter Phase 2	Sound	<p>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>	-
37	CH/1.4 Cathedral Quarter Phase 2	Unsound	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	Add the following additional bullet-point to the section on Design:- <i>“Any development should ensure that the tower of the former Bradford College Cathedral Building, to the east of</i>

Page	Section	Sound/ Unsound	Comments	Suggested Change
			site.	<i>this site, remains as a prominent local landmark”.</i>
38	CH/1.5 Burnett Street Car Park	Sound	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.	-
38	CH/1.5 Burnett Street Car Park	Unsound	<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 (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>(1) Design – Add an additional bullet-point along the following lines:-  <i>“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”.</i></p> <p>(2) Design – Add an additional bullet-point along the following lines:-  <i>“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”</i></p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
39	CH/1.6 Olicana House, Chapel Street	Unsound	<p>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>Design – Add an additional bullet-point along the following lines:-</p> <p><i>“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”.</i></p>
40	CH/1.7 East parade Car Park	Unsound	<p>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.</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>Design – Add an additional bullet-point along the following lines:-</p> <p><i>“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”.</i></p>
41	CH/1.8 Land west of Wharf Street	Unsound	<p>This site adjoins the boundary of the Cathedral Precinct Conservation Area.</p> <p>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>Design – Add an additional bullet-point along the following lines:-</p> <p><i>“The scale and design of new development should respond sensitively to the character of the adjacent to Cathedral Precinct Conservation Area”</i></p>
42	CH/1.9 Vacant Plot bounded by Church	Unsound	<p>This is a very sensitive site within the Little Germany Conservation Area and adjacent to the boundary of the Cathedral Quarter Conservation Area. It</p>	<p>(1) Design – Add the following additional bullet-points along the following lines:-</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Bank, Vicar Lane and Currer Street		<p>has Grade II Listed Buildings to its south-west, 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 better reflected in the Design Principles.</p>	<p><i>“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.</i></p> <p><i>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)”.</i></p> <p>(2) Design – Add an additional bullet-point along the following lines:-  <i>“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”</i></p>
43	CH/1.10 Vacant Plot bounded by Church	Unsound	This is a very sensitive site within the Little Germany Conservation Area and adjacent to the boundary of the Cathedral Quarter Conservation Area. It	Design – Add the following additional bullet-points along the following lines:-

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Bank, Peckover Street and Currer Street		<p>has Grade II Listed Buildings to its south-west and north-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 better reflected in the Design Principles.</p>	<p><i>"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.</i></p> <p><i>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)".</i></p> <p>(2) Design – Add an additional bullet-point along the following lines:-  <i>"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"</i></p>
44	CH/1.11 Gate Haus 2	Sound	<p>This site lies opposite the boundary of the Little Germany Conservation Area.</p> <p>Therefore we welcome the Design</p>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			requirements set out for this site	
45	CH/1.12 Conditioning House, Cape Street	Sound	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.	-
45	CH/1.12 Conditioning House, Cape Street	Unsound	Whilst there may be potential for a multi-decked 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.	Design, fourth bullet-point amend to read:- <i>“Subject to demonstrating that it would not harm the significance of the Listed Building, there could be an opportunity ... etc”</i>
46	CH/1.13 Midland Mills, Valley Road	Sound	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.	-
47	Vision for Shopping and Markets Neighbourhood	Sound	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.	
48	Shopping and Markets Neighbourhood, first Paragraph	Sound	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.	
48	Shopping and Markets Neighbourhood character and Built form	Sound	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.	



Page	Section	Sound/ Unsound	Comments	Suggested Change
48	Shopping and Markets Neighbourhood Spatial Framework	Unsound	<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 Shopping and Markets Neighbourhood</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	<p>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.</p> <p>This Policy should be based upon the Spatial Framework set out on pages 48 and 49.</p>
51 to 55	Shopping and Markets Neighbourhood Allocations	Unsound	<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>Add to the end of the above Policy:-  <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i></p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
51	M/1.1 Car park, Simes Street	Unsound	<p>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>(1) Amend the boundary of site M/1.1 to include the Grade II Listed Fountains Hall (Simes Street Chapel).</p> <p>(2) Design, first bullet-point amend to read:-  <i>“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.”</i></p>
52	M/1.2 Car Park on Site of former Carlton Grammar School, Grammar School Street	Sound	<p>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> <ul style="list-style-type: none"> <li>• Development should respond sensitively to the surrounding historic context and safeguard the character and setting of the nearby Listed Building.</li> <li>• Carlton House should be retained as part of the scheme and any new buildings respond sensitively to it.</li> </ul>	-
53	M/1.3 Stone Street Car Park	Unsound	<p>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.</p>	<p>Design – Amend the third bullet-point along the following lines:-  <i>“The scale and design of new development should respond sensitively to the</i></p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
			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.	<i>surrounding historic context and safeguard the character and setting of the adjacent Listed Building.”</i>
54	M/1.4 Former Yorkshire Building Society Headquarte rs, High point, New John Street	Sound	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.	-
55	M/1.5 Former Tetley Street Shed, Tetley Street	Sound	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.	-
56	Vision for Goitside	Unsound	This is the Vision for the Shopping and Markets area.	Amend accordingly
57	Goitside, character and Built form	Sound	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.	-
57	Goitside Spatial Framework	Unsound	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.	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

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<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</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	based upon the Spatial Framework set out on pages 57 and 58
60 to 69	Goitside Allocations	Unsound	<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>	Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i>
60	V/1.1 Former Provident Financial Head-quarters, Sunbridge Road	Sound	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	-
64	V/1.5 Yorkshire Stone Yard	Sound	The site lies within the boundary of the Goitside Conservation Area. Therefore we welcome the Design requirement	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
	and Mill, Thornton Road/Lowe r Grattan Road		that:- <ul style="list-style-type: none"> <li>• The scale and design of new development should respond sensitively to the surrounding historic context</li> <li>• Development should repair the urban structure by following the historic building line</li> <li>• 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</li> <li>• New buildings should respond positively to the alley which runs through the site and the goit</li> </ul>	
66	V/1.7 Vacant site south of Sunbridge Road, bounded by Tetley Street and Fulton Street	Unsound	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.	Design Requirements, add the following additional bullet-point:- <i>“The site lies within the Goitside Conservation Area and there is a Grade II Listed Building adjacent to its north-eastern corner. 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”</i>
67	V/1.8 Car Sales/ Filling Station Site, Thornton Road	Unsound	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.  In line with the approach adopted elsewhere, the need for any development to safeguard the character	Design Requirements, add the following additional bullet-point:- <i>“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</i>

Page	Section	Sound/ Unsound	Comments	Suggested Change
			and setting of these heritage assets should be referred to as part of the site description.	<i>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”</i>
68	V/1.9 Sunwin House, Godwin Street/Sun bridge Road	Sound	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.	-
69	V/1.10 Thornton Road/ Water Lane	Unsound	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.	Design Requirements, add the following additional bullet-point:- <i>“The site adjoins the boundary of the Goitside Conservation Area. Any redevelopment of this area should respond sensitively to the surrounding historic context”</i>
70	The Learning Quarter Vision	Sound	We support the Vision for the Learning Quarter particularly the intention that, by 2030 the Campus and City Centre will be brought closer together.  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.	-
71	Learning Quarter	Unsound	This Section includes a specific Vision of how this area will look and function in	Add an additional Policy to this Section of the

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Neighbourhood Spatial Framework		<p>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</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	<p>Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account.</p> <p>This Policy should be based upon the Spatial Framework set out on page 71.</p>
72 to 75	Goitside Allocations	Unsound	<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>Add to the end of the above Policy:-  <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i></p>
76	The Southern	Unsound	<p>This Section includes a specific Vision of how this area will look and function in</p>	<p>Add an additional Policy to this Section of the</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
	Gateway Spatial Framework		<p>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 Southern Gateway</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	<p>Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account.</p> <p>This Policy should be based upon the Spatial Framework set out on page 77.</p>
78 to 82	The Southern Gateway Allocations	Unsound	<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>Add to the end of the above Policy:-  <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i></p>
88	Paragraph 4.20	Sound	<p>Given the number of Listed Buildings in the City Centre and the amount of</p>	-



Page	Section	Sound/ Unsound	Comments	Suggested Change
			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.	
88	Paragraph 4.20, line 3	Factual correction	It is presumed that line 5 of the first Paragraph should refer to “ <i>conversion</i> ” rather than “ <i>conservation</i> ”.	Paragraph 4.20, line 3 change “ <i>conservation</i> ” to read “ <i>conversion</i> ”
88	Policy CL1, Criterion B	Sound	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).	-
88	Policy CL1, Criterion E	Sound	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.	-
90	Policy CL3	Sound	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	-
91	Policy CL4	Sound	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	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			Bradford.	
95	Figure 16	Unsound	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.	Define the southern part of Ivegate as a Secondary Frontage
96	Policy SL4	Sound	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.	-
103	Paragraph 4.84	Sound	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.	-
103	Policy M1,	Sound	Subject to the amendment set out below, we support this Policy especially those elements which relate to:- <ul style="list-style-type: none"> <li>• Facilitating pedestrian movement between key locations including those in the hinterland of the City Centre and public transport facilities</li> <li>• Using opportunities [provided by development to redesign the road space to provide a greater focus on pedestrian and cycle movement</li> <li>• Identifying the ongoing Heritage Streets Improvement as one of the Councils priority routes within the City Centre</li> </ul>	

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<ul style="list-style-type: none"> <li>Improving the pedestrian and cycle linkages between the two stations.</li> </ul>	
103	Policy M1, Criterion B omission	Unsound	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 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.	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
105	Policy M2, Criterion E	Sound	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	
105	Paragraph 4.93	Sound	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.	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
106	Policy M3	Unsound	<p>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>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 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>
111	Policy BF1	Sound	<p>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.</p> <p>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).</p>	-
112	Policy BF2	Sound	<p>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</p>	-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			that tall buildings should:- <ul style="list-style-type: none"> <li>• Respect and/or enhance the skyline, key views, vistas and landmarks</li> <li>• Have a positive relationship with the surrounding context including the scale of buildings in historic areas and the City's natural bowl topography.</li> </ul>	
112	Policy BF2	Unsound	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.	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
114	Paragraph 4.122 to 4.126	Sound	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.	-

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

  
Historic Environment Planning Adviser (Yorkshire)  
e-mail: 