

Your City - Your Plan

The Bradford City Centre Area Action Plan

Submitted - 08/02/2016

Client

Title
First Name* [REDACTED]
Last Name* [REDACTED]
Job Title (if applicable) Senior Asset Manager
Organisation (if applicable) Mary Street Estate Ltd (British Land Plc)
House Number/Name* [REDACTED]
Street name* [REDACTED]
Locality (e.g. Haworth) [REDACTED]
Town/City* [REDACTED]
Postcode* W1H [REDACTED]
Email Address* [REDACTED]
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Agent

Title [REDACTED]
First Name* [REDACTED]
Last Name* [REDACTED]
Job Title (if applicable) Partner
Organisation (if applicable) Montagu Evans
House Number/Name* [REDACTED]
Street name* [REDACTED]
Locality (e.g. Haworth) [REDACTED]
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Telephone Number [REDACTED]

What comment do you wish to make?

A specific site/policy/section in the plan

Details

Site reference from the document or Map (e.g. B/1.1)* CH/1.2
Do you agree with the proposed use of the site* No

Is the plan sound?

Do you consider the the plan to be sound?* No

Which test of soundness are you comments about?

Postively Prepared
Effective
Justified
Consistency with National Policy

Please set out why you think the plan is unsound ?

See covering letter reproduced below.

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.

Points for Discussion

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.

The extent of the site allocation

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 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.

Building layout

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.

St Blaise Way, Valley Road and Lower Kirkgate

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 within and through the Site Allocation to help connect the development to the surrounding area and encourage walking and cycling.

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.

Car Parking

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.

Retail Use

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 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.

Please set out what change(s) you would consider necessary to make the Plan sound?

See proposed revision to CH/1.2

Site Size: 1.88ha

Existing Use: Vacant Royal Mail Sorting Office

Proposed Use: Leisure/ LedRetail Led Mixed Use

Estimated Delivery: 2015 - 2020

Design

- 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 linked to the enhancements to Forster Square station.

Transport

- 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.

Floodrisk

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.

Is the Plan legally compliant?

Legally compliant* Don't Know

Which part of the legal compliance is your comment about?

- | | |
|--|-------------------------------------|
| Local Development Scheme | <input type="checkbox"/> |
| Planning and Compulsory Purchase Act 2004 | <input type="checkbox"/> |
| Statement of Community Involvement | <input type="checkbox"/> |
| Sustainability Appraisal Report | <input type="checkbox"/> |
| Consultation of appropriate Statutory Bodies | <input type="checkbox"/> |
| Town & Country Planning (Local Planning) Regulations | <input type="checkbox"/> |
| Duty to Cooperate | <input type="checkbox"/> |
| Not sure/other | <input checked="" type="checkbox"/> |

Please give details of why you consider the plan is not clear on legality ?

See covering letter

Taking part in the public examination

Your comments will be taken into account by the Planning Inspector. Would you like to take part in the forthcoming Public Examination?

Yes

Future updates

Please select from below if you would like to be notified of any of the following?

The Submission of the Plan(s) for Public Examination



Furure adoption

