

**BRADFORD CITY CENTRE AREA ACTION PLAN AND SHIPLEY AND CANAL  
ROAD CORRIDOR AREA ACTION PLAN EXAMINATION**

Inspector: Miss Louise Nurser BA (Hons) Dip UP MRTPI  
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**BRADFORD CITY CENTRE AREA ACTION PLAN AND SHIPLEY AND CANAL  
ROAD CORRIDOR AREA ACTION PLAN**

**INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR DISCUSSION AT  
THE EXAMINATION HEARINGS**

**VERSION 1**

The Hearings Programme may be updated. Please ensure that you check the latest position if you wish to attend a particular hearing by contacting the Programme Officer or viewing it on the website at [www.bradford.gov.uk](http://www.bradford.gov.uk).

Please remind yourself of the guidance concerning the format of the hearing at this Examination, contained in the Inspector's Guidance Note.

*The two documents were submitted for examination at the same time.  
Accordingly, where possible, cross cutting issues will be dealt with together.*

**Matters relating to flooding, including potential impact on individual sites, have not been referred to within these MIQs and will be the subject of a separate document.**

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## **Matter 1: Legal Compliance, Sustainability Appraisal, including Duty to Co-operate.**

*Issue 1: Have the plans been prepared in line with the relevant legal requirements and procedural matters?*

### **1. Have both plans been prepared in accordance with the Local Development Scheme, including in terms of timing and content?**

#### **Council Response**

Both Area Action Plans (AAPs) have been prepared in accordance with the Local Development Scheme (Core Strategy Document SS/054 - Local Development Scheme 2014-2017). The timing and content of both plans are considered to be in accordance with the latest Local Development Scheme (SS/054).

### **2. Has consultation been carried out in accordance with the Statement of Community Involvement and the relevant Regulations?**

#### **Council Response**

Consultation on both plans has been carried out in accordance with the Statement of Community Involvement (SCI) (Core Strategy Document SS/055), and the relevant Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012).

For the Shipley and Canal Road Corridor (SCRC) AAP see the SCRC Statement of Consultation (SCRC SD-008, SCRC SD-011), SCRC Engagement Plan (SCRC SD-010, SCRC SD-013) and the SCRC Legal and Soundness Self-Assessment checklist (SCRC SD-015, SCRC-SD-016) for further details.

For the Bradford City Centre (BCC) AAP see the BCC Statement of Consultation (BCC SD-008, BCC SD-009) BCC Engagement Plan (BCC SD-014) and the BCC Legal and Soundness Self-Assessment checklist (BCC SD-015, BCC -016) for further details.

### **3. Have the plans been subject to Sustainability Appraisal (SA), including a final report on the published plans, and Habitat Regulations Assessment (HRA)? Have all reasonable alternatives been considered in terms of policies and sites and is it clear how the SAs have influenced the plans? Are there any policies where there were no reasonable alternative policy options to consider, if**

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### **so, what is the justification? Are there any outstanding issues deriving from the HRA?**

#### **Council Response**

The plans have been subject to Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) Screening, including a final report on the Published Plans. See the final SA Reports and Non Technical Summary (SCRC SD-003 and BCC SD-003) and HRA Screening (SCRC SD-018, SCRC SD-019 and BCC SD-017). The SA and HRA comply with the relevant Regulations.

The Council confirms that the Sustainability Appraisal reports (BCC-SD-003 and SCRC-SD-003) appraise all the various reasonable alternative options considered and clearly indicate why the preferred option was chosen, including all necessary mitigation measures and the reasons for rejecting any reasonable alternatives. There are no outstanding issues related to the Sustainability Appraisal work.

A Habitats Regulation Assessment (HRA) screening has also been carried out for both AAPs (BCC-SD-017 and SCRC-SD-019). The HRA screening process has reviewed the available data and the Submission Draft AAPs, and it is concluded that both the BCC and SCRC AAPs will have no likely significant effects (alone or in combination) on the North Pennine Moors SAC or the North Pennine Moors SPA due to either an absence of impact pathways, policy controls within the plans that can be relied on to ensure significant effects are avoided, or external controls that account for the growth aspects of the plan and with which the plans are consistent. It is therefore concluded that there is no need to undertake a further or full HRA process.

The final HRA report for the SCRC AAP (SD-019) recommends that the wording of three policies (NBE4, NBE1 and HSC2) could be strengthened. It is considered that the SCRC AAP approach to protecting the South Pennine Moors and their Zone of Influence in regards to policies in the AAP are soundly based and consistent with national policy and the Core Strategy. The Council recognise the recommendations in the HRA Screening report (SD-019) for strengthening the three policies (NBE4, NBE1 and HSC2,) however these changes are not considered necessary as the SCRC AAP has clear links in Policy SCRC/NBE4 to Core Strategy Policy SC8. Policy SC8 sets out the detailed policy approach for protecting the South Pennine Moors and their zones of influence. The Council has identified a draft proposed modification (PM0023) to ensure the SCRC AAP reflects the most up to date Core Strategy Policy SC8 following main modifications to the Core Strategy. However, the Council is willing to consider further modifications in line with the HRA Screening recommendations if these are considered necessary to make the plan sound.

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### **4. Have the plans been prepared in accordance with the relevant Act and regulations?**

#### **Council Response**

It is considered that both AAPs have been prepared in accordance with the relevant planning Act and Regulations. See the Soundness Self-Assessment Checklist and the Legal Compliance Checklist (BCC SD-015, BCC -016) (SCRC SD-015, SCRC-SD-016) for further detail.

### **5. Have the Plans been prepared in accordance with the Duty to Co-operate, particularly in terms of whether the Council has discharged its duty to maximise the effectiveness of the plan-making process in relation to strategic matters, including development and infrastructure requirements, flooding and other cross-boundary issues and strategic priorities, including those of the Local Enterprise Partnership (LEP) and the Local Nature Partnership (LNP), as well as other prescribed bodies such as Highways England (HE), the Environment Agency (EA), Historic England (Hist E) and Natural England (NE).**

#### **Council Response**

The plans have been prepared in accordance with the Duty to Co-operate. The AAP Publication Draft Background papers (SCRC SD-014 and BCC SD-15) set out how the plans have addressed strategic planning and the Duty to Cooperate.

The Council consider that the legal requirements of the Duty have been met. The Council has engaged constructively, actively and on an on-going basis during the preparation of the AAPs with the prescribed consultation bodies to maximise the effectiveness of plans in the context of strategic cross boundary matters. This is demonstrated in the AAP Duty to Co-operate Statements and supporting appendices (SCRC SD-017, SCRC SD-024 and BCC SD-016, BCC SD-020).

Details of the consultation undertaken at each plan production stage and the responses received can be found within the Statements of Consultation (BCC-SD-008, BCC-SD-009, BCC-SD-034 and SCRC-SD-008, SCRC-SD-011).

Local Nature Partnerships (LNPs) are prescribed in the Regulations as bodies which local authorities 'should have regard to' given their role in the management of natural environmental assets, supporting biodiversity and,

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in particular, identifying Nature Improvement Areas. They are relatively new partnerships and have evolved from recommendations in the Natural Environment White Paper. Bradford is part of two Local Nature Partnerships – the South Pennines LNP and the Yorkshire West LNP which are at an early stage of development. The Yorkshire West LNP is currently developing an approach for responding to area plans and a framework for engaging partners and other LNP's in this work. Bradford will continue to engage with this process as it develops.

**6. Are the plans and their policies consistent with the emerging Core Strategy, the Strategic Economic Plan, and the objectives of the LNP and national planning policy? Are there any significant departures from national policy? If so, have these been justified?**

### **Council Response**

It is considered that both plans and their policies are consistent with the emerging Core Strategy and National Planning Policy. The AAP Publication Draft Background papers (SCRC SD-014 and BCC SD-15) set out the relationship with the other Development Plan Documents and how the AAPs and link to national planning policy and the emerging Core Strategy. It is not consider that there are any significant departures from national policy. See the Soundness Self-Assessment Checklist and the Legal Compliance Checklist (BCC SD-015, BCC -016) (SCRC SD-015, SCRC-SD-016) for further details.

**7. Is the evidence which has been used as the basis of the Area Action Plans (AAPs) up to date and have the final versions of all reports been provided? Is there any duplication of policies between the emerging CS and the AAPs?**

### **Council Response**

It is considered that the plans area based on up-to-date and robust evidence, in accordance with NPPF paragraph 158. The AAP Publication Draft Background papers (SCRC SD-014 and BCC SD-15) provides a summary of the key evidence that has informed the plans.

Final versions of all evidence base documents have been submitted including the Bradford City Centre Car Parking Study (PS-A012) in response to the Inspector's initial questions.

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It is not considered that there is any duplication between the policies in the emerging CS and the AAPs. Where relevant, both AAPs include policy links to higher level strategic policies in the Core Strategy.

### **8. Should the plans each include a list of superseded policies? If so, should lists be provided?**

#### **Council Response**

Regulation 8(5) of the Town and Country Planning Regulations (2012) states that "*Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy*". It is therefore considered that the Plans should include a list of policies from the RUDP 2005 which will be superseded as an Appendix to the AAPs through a main modification. The Council will provide a list of superseded RUDP policies for each AAP.

#### *Issue 2: Coverage and general approach*

### **9. Is it appropriate that substantial reference is made within both AAPs, including within policies, to strategies and plans which are not statutory planning documents? Have both plans been prepared so that they are effective and justified, so that, together with the emerging Core Strategy, they satisfy the requirement in paragraph 154 of the Framework to provide a clear indication of how a decision maker should react to a development proposal without deferring to other non-statutory plans or documents<sup>1</sup>?**

#### **Council Response**

The Council are of the opinion that the reference to non-statutory strategies and plans is considered necessary to demonstrate the Area Action Plans are justified through being based on a proportionate evidence base. The reference to the various non-statutory documents illustrates the Council's research and fact finding in support of the policies within the plan.

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<sup>1</sup> For example, Policies M5 and M6 of the BCCAAP refer to supporting evidence within the text of the policy, and Policy BF2 refers to the Neighbourhood Spatial Frameworks, and the City Centre Design Guide.

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It should also be noted the City Centre Design Guide is considered a statutory planning document, as the document is an SPD and was adopted by the Council in 2006.

The addendum to the City Centre Design Guide was produced during work undertaken on the City Plan in 2015. The addendum and City Plan was approved by the Council's Executive in February 2015, with the recommendation:

*"That City Plan be used to inform the policies, land allocations, and the delivery section of the City Centre Area Action Plan"*

The Neighbourhood Spatial Frameworks (as set out in pages 21, 30, 48, 57, 71 and 77 of the City Centre AAP) will form part of the statutory planning framework for the city centre upon adoption of the City Centre Area Action Plan.

Reference is made where appropriate to supporting evidence base documents, including the Green Infrastructure and Ecological Assessment, as these documents provide guidance and detailed technical information which is not considered appropriate to include in the AAPs but which will support the implementation of the plan policies and the consideration of appropriate solutions as part of the consideration of site specific issues at the detailed planning application stage.

### **10. Do the Plans have sufficient flexibility to adapt to rapid change (para 14 of the Framework)?**

#### ***Council Response***

The Council are of the opinion the Plans incorporate sufficient flexibility to adapt to rapid change. As stipulated in the answers to Question 9, many of the live documents referenced within the plan will be subject to regular review and updates. In combination with this, many of the policies set out in the AAPs contain a number of contingencies, which ensure the plans are sufficiently flexible to adapt to changes which may arise through the course of the plan period.

This is also covered by the Implementation and Delivery Chapters of each AAP, which set out the monitoring framework supported and gives an indication as to how performance will be judged against outcomes and possible triggers for plan review. The Monitoring Framework which will measure the success of the Objectives and Policies within the AAP and help to identify any potential need for a review of all or part of the AAP, the

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relevant Core Strategy Performance Monitoring Framework indicators set out in the Framework. A review of the Plan is likely to be triggered where monitoring shows that key elements of the Plan would not be met to a significant extent.

**Is the status, and relationship between the Policy Frameworks of both AAPs and the detailed individual development proposals, adequately clear?**

### ***Council Response***

The Council are of the opinion the status and relationship between the Policy Frameworks of both AAP's and the proposed allocated development sites is adequately clear. Both plans state how the documents will "set out planning policies to guide development proposals and associated infrastructure in the city centre, along with details of how these proposals will be delivered. It will also be used to determine planning applications in the city centre over the next 15 years" (City Centre AAP) and "The development frameworks and site allocations in this section provide a planning framework for each sub area. In all cases, development proposals should be considered not only in the context of the development frameworks but also the area-wide policies within the AAP in Section 3" (Shipley and Canal Road Corridor AAP). The Council consider the wording set out in the AAP's adequately clear to establish the status and relationship between policies and proposals in the plans.

**If the text, relating to the individual sites is envisaged to be treated as a policy, is it adequately flexible?**

### ***Council Response***

The Council are of the opinion the allocation proposal statements are considered adequately flexible. The contents of the proposal statements allow for sufficient scope to ensure they are flexible and can respond the change. The proposed site allocations are not considered separate to that of the policy framework, and thus section 4 is applicable, which sets out the monitoring framework supported and gives an indication as to how performance will be judged against outcomes and possible triggers for plan review.

It should also be noted the Implementation and Delivery chapters also contains estimated delivery of sites allocated within the Plans and the monitoring framework.



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A review of the Plan is likely to be triggered where monitoring shows that key elements of the Plan would not be met to a significant extent.

### **11. Are all the policies of both AAPs which have a geographical application clearly and consistently shown on the Policies Map?**

#### ***Council Response***

The Council are of the opinion all the policies of both Area Action Plans have been presented clearly and consistently on the Policies Map for the respective documents.

### **12. In what ways are the proposed modifications which have been subject to public consultation necessary (DPM023 and DPM030) to ensure the soundness of the BCCAAP?**

#### ***Council Response***

The proposed modifications DPM023 and DPM030 are considered necessary to ensure the Bradford City Centre Area Action Plan is robust and sound.

DPM023 sets out the correct neighbourhood vision for Goitside, as opposed to the Markets neighbourhood vision, which was used in the consultation material at the publication stage and also submitted to the Secretary of State for independent examination. The correct vision for the Goitside neighbourhood (as depicted in DPM023) ensures the vision for the area is justified and effective.

DPM030 sets out a modified Policies map, which now includes all geographical interpretation of all relevant policies within the City Centre AAP. The relevant policies were previously mapped, but not on one comprehensive map. The modification was considered necessary to ensure the soundness of the City Centre AAP to ensure it is consistent with national policy which requires a policies map (singular) [NPPG - Paragraph: 010]

*Council*

*Highways England*

*Montagu Evans*

*Iain Bath Planning*

*Courthouse Planning*

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### **Matter 2: Vision and Objectives**

*Issue 1: Whether the Spatial Visions for the Bradford City Centre and Shipley and Canal Road Area Action Plan are justified, locally distinctive and appropriate, reflecting community views and issues raised during the preparation of the Plan; are the Objectives appropriate, effective, justified and soundly based and will they help to deliver the spatial vision of the Plan.*

#### **13. Are the objectives and visions of the sub areas consistent with those of each AAP and the emerging CS?**

##### ***Council Response***

The Council are of the opinion the sub-area objectives and visions of the AAP are consistent with the emerging Core Strategy and the AAP vision and objectives set out at the beginning of the documents.

The vision and objectives set out within the emerging Core Strategy establishes at strategic direction for the district. The vision and objectives in each AAP take forward this strategic approach to establish distinctive aspirations for the AAP areas. These vision and objectives are then applied to each sub-area of the AAP's to create local distinctive aims for each neighbourhood.

#### **Are the policies sufficiently detailed to be effective in realising the distinctive visions of each of the defined sub areas within the plans?**

##### ***Council Response***

The Council are of the opinion the policies are sufficiently detailed be effective in realising the distinctive vision of each of the defined sub area within the Area Action Plans. Each thematic policy section within the AAP's details which of the objectives the policies are aiming to achieve. As detailed above, the sub-area visions and objectives have been derived from the overall vision and objectives for the AAP's, which demonstrates how the policies within the Plans are realising the visions of each sub-area.

*Bradford City Centre Action Area*

#### **14. In what way is the proposed modification provided by the Council (DPM004) necessary to ensure the soundness of the AAP?**

##### ***Council Response***

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The Council consider the modification DPM004 necessary to demonstrate the plan has been positively prepared and consistent with national guidance, thus ensuring the soundness of the AAP. The modification promotes healthy communities within the City Centre by assisting in the delivery of a safe and accessible environment, in accordance with paragraph 69 of the National Planning Policy Framework.

### *ShIPLEY and Canal Road Corridor Action Area*

#### **15. In what way are the proposed modifications (DPM001 and DPM002) tabled by the Council required to ensure the soundness of the AAP?**

##### **Council Response**

The proposed modifications are considered necessary to ensure the plan is consistent with national policy. The proposed modification (DPM001) will ensure that AAP Objective 11 is fully consistent with paragraph 132 of the NPPF in response to representation by English Heritage (Smith, 003). The proposed modification (DPM002) will ensure the AAP Vision for the Shipley sub area is fully consistent with the wider AAP vision and will support the delivery of sustainable development in regards to enhancing the setting of the Saltaire World Heritage Site, in line with NPPF paragraph 137 in response to the representation by English Heritage (Smith, 003).

#### **16. What is meant by an Eco Settlement?**

##### **Council Response**

The Urban Eco Settlements (UES) Programme is the Leeds City Region's alternative to a freestanding Eco Town, which aims to deliver eco principles within the existing built urban environment on a number of major regeneration sites. The Shipley and Canal Road Corridor (SCRC) is identified as one of four UES locations in the Leeds City Region. See Leeds City Region Urban Eco Settlements, Delivery Programme, October (2009) (SCRC SD 048) and (Urban Eco Settlements Deliverability Assessment January (2009) SCRC SD 049) for further details.

The SCRC has been proposed as a UES due its location within the heart of one of the city region's major economic and population centres. The SCRC offers a unique opportunity in the Bradford District and wider city region to secure investment and innovation in the delivery of sustainable housing and economic development, environmental improvements and place making and the creation of vibrant and sustainable new urban neighbourhoods, which will benefit local and disadvantaged communities within and

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adjoining the area. The SCRC has the potential to become a popular place to live and work, which is well connected and located close to jobs and facilities, within a green and attractive environment. This context underpins the identification of the area as an 'Urban Eco-Settlement'.

As a basis to deliver the strategic growth and regeneration ambitions for the District, the Core Strategy identifies the SCRC as an 'Urban Eco-Settlement' under Policies SC6 and HO2 to highlight its status in the Leeds City region and the area's characteristics and opportunities in terms of its potential for housing growth and as a strategic green infrastructure corridor. Based upon this approach, the aspiration for the SCRC as set out in Core Strategy Policy BD1 is to deliver the overarching UES principles of sustainable development in terms of sustainable housing growth supported by environmental and sustainable transport improvements.

In accordance with the emerging Core Strategy, the SCRC AAP sets out planning policies and sites to guide the development of an UES in the Corridor, along with details of how these proposals will be delivered. The AAP aims take forward the principles of the UES programme taking into account the local context of the area, current national planning policy and viability issues. Appendix E of the SCRC AAP sets out how these principles have been taken forward in the AAP.

### **Is the Eco Settlement concept envisaged to include all development within the boundary of the AAP?**

#### **Council Response**

The UES concept will apply to whole AAP area and the Council will seek to ensure that all development in the Corridor incorporates UES principles, where possible, and takes opportunities to achieve high standards of sustainable design and construction. The transformation of the Centre Section of the SCRC AAP will be the focus for the UES as the area includes two large-scale housing sites (New Bolton Woods NBW1, Bolton Woods Quarry BWQ1), which present the opportunity to deliver significant numbers of new homes, jobs, open spaces and community infrastructure required to create new sustainable urban neighbourhoods over the longer term.

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**Is this approach justified by evidence and is it consistent with national policy, in particular the Written Ministerial Statement of March 2015?**

### **Council Response**

The Council recognise the ministerial statement of March 2015, which cancelled the Planning Policy Statement: Eco Towns, however it is considered that the AAP approach to identifying the area as a UES is fully justified. The UES programme is the Leeds City Region's response to the previous Government's Eco Town programme. The Eco town standards have therefore only informed the development of the SCRC AAP UES principles. The AAP will aim to deliver a local response to the UES principles and includes policies in relation to delivering new homes and sustainable neighbourhoods, sustainable design and construction, flood risk and water management, healthy lifestyles, maximising sustainable transport, biodiversity and ecology and green infrastructure. The general principles contained in the Eco Town PPS 1 Supplement (SD-047) have informed these policies, which have been tested through the evidence base to ensure that they are locally specific and deliverable. The AAP policies have been designed to ensure that standards are flexible and subject to feasibility and viability. The Council therefore consider that it has balanced its UES aspirations for the SCRC against the available evidence.

It is considered that identifying the SCRC's status in the Leeds City Region as an UES, will enable the Council to seek opportunities to deliver higher or innovative standards of sustainable development, where possible and to attract further funding to support the delivery of sustainable development, infrastructure and place making in the SCRC.

*Council  
Historic England*

### **Matter 3: Housing**

*Issue 1: Whether the approach to identifying housing sites is fully justified, based on up-to-date and reliable evidence, effective, deliverable, positively prepared, soundly based and consistent with the policies of the emerging CS and latest national guidance (NPPF/PPG)*

**17. How much certainty is there that at least 3500 (BCCAAP) and 3100 homes (SCRCAAP) will be delivered within plan period as a whole?**

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### ***Council Response***

The Council considers that there is extensive evidence to justify the housing figures within the Area Action Plans, identified as growth areas within the Core Strategy. These are the two areas where the most detailed work has already been undertaken to examine and bring forward comprehensive proposals for growth and regeneration and the provision not just of new housing but also of supporting infrastructure and green space.

The two AAP areas are all different in terms of their current make up, the proposals being brought forward and the mechanisms for delivery. The City Centre is an area currently with a modest housing offer but with massive potential for future development in particular in the re-use of its rich tapestry of historic buildings. It is however an area in need of on-going regeneration and where the developing housing offer was effectively put on hold at the onset of the housing market crash of 2008. Confidence in the City Centre following the opening of The Broadway Shopping Centre by Meyer Bergman and Westfield in November 2015 is now growing rapidly and there have been a range of investment proposals and projects which have been announced in the retail and commercial sectors over the last year which underline this. Most significantly The Broadway Phase 2 is now under construction which will include a boutique cinema and several restaurant units with a likely opening in 2017.

The Council is also investing heavily in the City Centre in terms of both physical projects and support for businesses. It is introducing a Local Development Order and Local Listed Building Consent Order to simplify the planning process in the City Centre and encourage the re-use of buildings of heritage value. It has also introduced a scheme offering rate relief to businesses in the city centre. It is facilitating the development of key sites including and is continuing to build on the success of its award winning City Park with a programme of events which are designed to promote the centre as a vibrant place.

The Area Action Plan for the City Centre will bring forward a suite of policies to support and reflect the range of projects and initiatives.

The Council and its partners have been undertaking detailed regeneration work in Bradford city centre over the last 15 years. In 2003, the Bradford Centre Regeneration Urban Regeneration Company produced the City Centre Masterplan (Will Alsop, 2003) which set out a new vision for the future of the city centre. The Masterplan was followed up with four detailed neighbourhood design frameworks which were adopted by the Council in

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2007 as material consideration in the determination of planning applications pending the adoption of the Bradford City Centre AAP.

Further work was commissioned by the Council in 2013 to review the Masterplan and the Neighbourhood Development Frameworks. The Council approved the Bradford City Plan on 10 February 2015 which will help support delivery of the Council's ambitions for the City Centre and will inform the detailed work on the AAP in line with the Core Strategy. The City Plan is a non-statutory plan which will act as the overarching regeneration delivery plan for the development of the city, including the establishment of shared principles to govern regeneration in the city centre, establish investment priorities, align planning and infrastructure investment and ensure a partnership approach to tackling issues affecting the city centre.

All of the initiatives within the city centre are designed to and expected to stimulate further development and investment including from housing developers. The Core Strategy growth area proposal and the housing target for the city centre also align with the latest evidence on land supply from the third SHLAA. The additional work which the Council has done to identify site options and assess deliverability has meant a significant increase in the available capacity in the current SHLAA as opposed to the SHLAA Update of 2013. Although the figures are provisional, the Council estimates a capacity of approximately 5,018 within the city centre. The proposals for the City centre as a growth area within Policy HO2 of the Core Strategy are therefore considered to be justified, reasonable, deliverable and based on up to date evidence.

The growth area identified for the Shipley and Canal Road Corridor area also reflects significant work already undertaken and the content of the emerging statutory Area Action Plan. The AAP has already been subject to issues and options consultation in March 2013. The Shipley and Canal Road Corridor extends from the northern edge of Bradford City Centre to Shipley. It includes Shipley town centre and areas of housing, open space, industry and employment located alongside Canal Road. The Canal Road Corridor is a priority regeneration area in the Bradford district and has been identified as one of four Urban Eco Settlement locations within the Leeds City Region.

The Shipley and Canal Road Corridor proposals have been informed by a number of reports, studies and strategies. This includes a Strategic Development Framework commissioned from consultants BDP, itself subject to consultation in February 2012. The Canal Road Corridor area includes a number of distinct areas and strategic development opportunities:

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- Shipley Town Centre - Shipley is an important town centre, which is a focus for future investment to deliver major improvements through the expansion of its retail, leisure, office and housing market offer;
- Canal Road Urban Village New Bolton Woods Masterplan Site - An 'asset based' Joint Venture Company between the Council and Urbo Regeneration Ltd, with the aim of delivering large scale regeneration within the designated Joint Venture Partnership Area.
- Bolton Woods Quarry - A large operational mineral extraction site which the owners have indicated is coming to the end of its operational life and is being promoted to be redeveloped for housing
- Employment zones - Including Canal Road employment zone and Shipley employment zone to the south of Otley Road
- Forster Square and Valley Road Retail Area - Existing area of large retail units including a Tesco food store and Forster Square Retail Park;

The Council are confident that the proposals for the Shipley and Canal Road Corridor are reasonable, justified and deliverable. It has already put in place mechanisms to ensure the delivery of the key central section of the corridor via the establishment of a Joint venture Company between the Council and Urbo Regeneration Ltd. The housing target for the area is based on the work carried out within the SHLAA and this in turn has been informed by the work being carried out as part of the AAP by both Council officers and its partners.

### **How many homes are likely to be delivered in the next 5 years within each AAP?**

#### ***Council Response***

The City Centre AAP has identified one site estimated to deliver residential units in the first 5 years of the plan. The site CH/1.6 - Olicana House is estimated to deliver a minimum of 20 units. The site is currently being developed for residential apartments as permitted office to residential conversion under the General Permitted Development Order.

The Shipley and Canal Road Corridor AAP has identified 11 sites estimated to deliver residential units in the first 5 years of the plan, which equates to 545. These figures do not include New Bolton Woods (NBW1) or Bolton Woods Quarry (BWQ1) as these are estimated to come forward over the plan period.



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**What contribution will both AAPs, individually and cumulatively, make to the delivery of housing in accordance with the phasing of the release of sites as set out in Policy HO4 of the emerging CS?**

### ***Council Response***

The emerging Core Strategy (as modified through modification MM92) states "As a result of allocation of 8/15 of the supply within phase 1 of the Allocations DPD and the allocation of all housing land within phase 1 within the two AAP's, the total land supply released at the start of the Local Plan period will amount to at least 25,533 units or 61% of supply." Taking this into account, the AAP's (cumulatively) they will contribute 6,600 to the over figure of 25,533. The Shipley and Canal Road Corridor AAP will contribute 3,100 units and the City Centre AAP will contribute 3,500 units.

All housing allocations set out within the Shipley & Canal Road Corridor and Bradford City Centre AAP's will be released at the start of the plan period. There are several reasons for this.

- Firstly this will ensure that a greater supply of sites is released in the early stages of the Local Plan period thereby enhancing delivery in the areas of the district where there is the most pressing need for new homes and for regeneration;
- Secondly it reflects the fact that the preparation of the AAP's is now at an advanced stage.
- In the case of the Shipley and Canal Road Corridor AAP the achievement of the proposed 3,100 homes is dependent on a small number of large and complex sites all of which have been assessed as potentially benefiting from the certainty that early release would provide.
- In the case of the City Centre AAP there is very little differentiation between sites with all being previously developed land and all being highly accessible to public transport services. The advanced nature of the work on the AAP has also given assurance that there are no significant infrastructure based reasons for a phased land release in this area. The Council also considers that in most cases these sites would have the potential to further establish and accelerate the emerging pattern of investment and regeneration in the City Centre that is now underway. The market within the City centre is changing at a rapid rate and it is considered important that the AAP takes a flexible approach which supports delivery on sites as and when proposals for development and investment arise.

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### **What assumptions have been made in relation to the loss of land within the individual site allocations to green and blue infrastructure and to transport improvements?**

#### ***Council Response***

On sites in the plans which are not supported by detailed masterplanning or which do not have detailed planning approval the consideration of site specific details within a development such as incorporating green and blue infrastructure and the transport improvement shall be undertaken during the planning application stage. The Council are of the opinion green and blue infrastructure and transport improvements can be incorporated into sites (where identified) and still achieve the level of development stated within the allocation statements.

In regards to the SCRC AAP on larger scale housing sites (SE1, NBW1) where new green/blue infrastructure and transport improvements will be expected on-site as part of the development to support the delivery of the linear park, assumptions regarding expected levels of development have been informed by detailed masterplanning work (New Bolton Woods Masterplan, SD-042) and detailed approved planning permissions (14/04818/MAF and 13/03792/MAF). These sites include the Bradford Beck and proposed canal route which are identified key green/blue infrastructure assets in the AAP.

### **Are the density levels which have been set within Policy CL1 (BCCAAP) and Policy H2 (SCRCAAP) realistic, consistent with market signals and the objective to provide for more family housing within the district?**

#### ***Council Response***

The Council is of the opinion the density levels set out in Policy CL1 of the City Centre AAP and H2 of the Shipley and Canal Road Corridor AAP are considered realistic, consistent with market signals and the objective of providing for more family housing within the District.

The Council has set out the approach to housing density to reflect local circumstances in accordance with NPPF paragraph 47. The proposed density targets will ensure that land within the AAPs is used effectively. The density policies have also been designed to allow flexibility should there be sites, where for good planning or design reasons, the normal required density targets cannot be achieved.

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Density levels set out in the policies are considered realistic and consistent with market signals as the sites proposed within both AAP's have been assessed through the Strategic Housing Land Availability Assessment. As part of the SHLAA analysis, the sites have been consulted upon with a working group including key stakeholders in the house building industry. These have included national and regional house builders and representatives from estate agency and surveyor consultancies.

Recent residential housing development within both AAP areas have also demonstrated the delivery of similar density levels (within their respective areas) to those set out in Policy CL1 of the City Centre AAP and H2 in the SCRC AAP.

They have been informed by a range of evidence including the latest SHLAA, the general characteristics of each area, an assessment of the specific nature of the site being proposed for allocation and the nature and type of housing needed in each sub area.

The Council consider the density levels set out consistent with the objective of providing increased family housing within each AAP area. Both AAPs include policies ensure residential developments will include family sized homes. The density of 40 dwellings per hectare in the majority of the SCRC AAP, and in particular the Centre Section where larger scale housing sites are located, is considered appropriate for sites within the urban area with good access to local facilities and transport and is a density which will still enable family type housing to be delivered on sites, with also the potential for some low rise flats/apartments.

### **18. What evidence is there that substantive viability issues will be able to be overcome in delivering the housing requirement over the plan period? Is this possible without compromising the regeneration objectives and policy requirements derived from the visions of the two AAPs, the policies<sup>2</sup> of the emerging CS, and the Core Planning Principles set out in the Framework?**

Council Response

The AAPs are supported by robust evidence, including AAP Viability and Delivery strategies (SCRC-SD-032 and BCC-SD-028) that identify a range of interventions for overcoming viability issues in regards to delivering the housing requirement.

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<sup>2</sup> For example, Policies HO9, BD1 and DS3 of the emerging Core Strategy

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The Council has provided further evidence (PS-A001b(i), PS-A001b(ii)) in response to the initial questions raised by the Inspector relating to the viability of development proposals in the AAPs.

The Council recognise that there are viability issues, in particular in the short term, and in regards to higher density development under current market conditions. The viability evidence indicates that, with the benefit of a continued improvement in market conditions it is expected that there will be an enhanced ability to meet policy standards. It is therefore considered that regeneration objectives and policy requirements are deliverable over the plan period but that flexibility is required in the wording of AAP policies and that supplementary measures are required to support delivery, especially in the short term.

The approach, as set out in Core Strategy Policy ID3 and AAPs, is to ensure all standards are flexible and subject to viability. This approach will ensure that where individual sites cannot meet all policy requirements due to economic viability, there is flexibility in the policy requirements to reduce or remove standards where justified on a site by site basis. This approach will allow development to come forward throughout the plan period and facilitate development throughout the plan period in accordance with NPPF paragraphs 173 and 174.

As highlighted in the AAP Viability and Delivery strategies (SCRC-SD-032 and BCC-SD-028) both plan areas are Regeneration Priority Areas for the District and will therefore be the focus of additional interventions and funding to support delivery and regeneration ambitions. It is considered that this will help enable the Council to overcome identified viability issues and meet policy standards and regeneration ambitions (improvements green infrastructure, sustainable housing) for the two plan areas.

**19. In line with the advice contained in the Planning Practice Guidance, and emerging Policy H08 of the CS how does each AAP recognise the different types of housing needed in the area and, where appropriate, identify specific types of housing to meet the anticipated housing requirements, including self-build<sup>3</sup>?**

### **Council Response**

In accordance with NPPF paragraph 159, the Council have produced a Strategic Housing Market Assessment (SHMA) (Core Strategy EB/050 and

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<sup>3</sup> Reference ID: 2a-021-20150326

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EB/052) to assess the need for all types of housing across the District. The SHMA has informed the policy approach and strategic housing priorities set out Core Strategy Policy HO8: Housing Mix and AAPs.

The approach for delivering different types of housing each AAP area is set out in the AAP policies SCRC/H2 and BCC AAP Policy/ CL1. These policies have been informed by the strategic housing priorities identified in the latest District SHMA (Core Strategy EB/052) and Core Strategy Policy HO8.

One of the main conclusions from the latest SHMA (Core Strategy EB/052) is that given the need to maintain the delivery of a variety of dwelling types and sizes to ensure that a better balance between demand and supply is achieved across the District, the Council should maintain a flexible approach in the delivery of open market dwellings. Both AAPs identify types of housing to meet housing requirements identified in the SHMA and Policy HO8 of the Core Strategy; however both AAP policies have been designed to offer flexibility to take into account site specific characteristics and local market demand, in accordance with recommendations from the SHMA and Core Strategy Policy HO8.

It should be noted that the latest SHMA does not cover some of the types of housing that the NPPG now asks authorities to plan for (such as self-build). Any update to the SHMA will cover the need for the different types of housing referenced in the NPPG. The Council is in process of developing the self-build register and therefore there is no specific data on the demand for self-build within the two AAP areas. However, the Council are aware of the ambitions of the Bradford Co-housing (016, Howson) group which align with the objectives of the AAP and Urban Eco Settlement principles. SCRC AAP Policy SCRC/H2 and Core Strategy HO8 supports custom/self-build on appropriate sites or as part of the overall housing mix.

### City Centre AAP

Given the nature of the land supply and characteristics of the city centre, the BCC AAP identifies that the majority of housing to be delivered is likely to be in the form of new build flats/apartments and the conservation of existing buildings. This is in line with the District's strategic housing priority of increasing the supply of high quality flats, particularly in city and town centres and accessible locations (Core Strategy Policy HO8/D5). The SHMA (Core Strategy EB/052, Figure 4.4) review of general market supply and demand indicates demand for flats in the city centre. In addition analysis of property type preferences for affordable housing suggests that primarily,

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delivery of one and two bedroom houses and flats is a priority (Core Strategy EB/052, paragraph 4.67).

In accordance with the Core Strategy strategic housing priority of delivering more family housing across the District, the BCC AAP (Policy CL1/A) sets out that development of new homes will be expected to contain a proportion of family sized homes, consisting of houses or apartments with two or more bedrooms. The policy does not define the exact proportion of family sized homes required to enable flexible approach to the delivery of dwellings which will respond to individual site characteristics and local market requirements for this type of housing on a site by site basis.

### **SCRC AAP**

Policy SCRC/H2/D of the SCRC AAP sets out that residential proposals should contribute to the District's strategic housing requirements and meet identified local needs in accordance with Core Strategy Policy HO8. Larger scale residential sites will be expected to deliver a range of housing types, sizes, and tenures and include a high proportion of family sized homes, with two to four bedrooms in accordance with the Core Strategy strategic housing priority of delivering more family housing across the District. The policy does not define the exact proportion of family sized homes required to enable flexible approach to the delivery of dwellings which will respond to individual site characteristics and local market requirements for this type of housing on a site by site basis.

The SCRC includes large scale housing sites, which offer the opportunity to deliver a range of house types and specialist housing products, as part of the overall housing mix. Policy SCRCH2/E identifies that larger scale housing sites should provide specialist housing products, including housing for older people to support the provision of specialist accommodation for older people in line with Core Strategic Policy HO8/D6, accessible homes and custom build/self-build plots. Proposals will be expected to consider the local need and demand for the inclusion of specialist housing products, such as specialist housing for older people and custom build/self-build plots, and be expected to take opportunities to meet any identified need within the site.

Guidance on housing mix is also set out in the relevant site allocation statements.

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### **20. What certainty is there that the proposed housing allocations will deliver levels of affordable housing consistent with Policy HO11 of the emerging CS?**

#### **Council Response**

Both AAPs set out that affordable housing will be required, in accordance with Core Strategy Policy HO11. The AAPs are supported by robust evidence, including AAP Viability and Delivery strategies (SCRC-SD-032 and BCC-SD-028) that identify a range of interventions for overcoming viability issues in regards to delivering the housing requirement. The Council recognise that while there are viability issues, particularly in the short term and on higher density sites under current market conditions, however the evidence indicates that improved market conditions will see an enhanced ability to meet policy requirements over the plan period. The affordable housing targets Core Strategy Policy HO11 are designed to be flexible and subject to viability to facilitate development throughout the economic cycle. Any reductions in affordable housing will need to be justified by robust viability evidence in accordance with Core Strategy Policy HO11 and ID3.

*Council*

*Iain Bath Planning*

*Courthouse Planning*

#### **Matter 4: Town Centre Uses**

*Issue 1: Whether the strategies for town centre uses within both plans are based on robust up to date evidence, consistent with national guidance<sup>4</sup> and the policies of the emerging CS?*

*Bradford City Centre Action Area*

### **21. How has the Parking Study<sup>5</sup> informed the identification of sites for development within the City Centre<sup>6</sup> and the wider strategy for the City Centre?**

#### **Council Response**

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<sup>4</sup> Planning Practice Guidance Paragraph 002:Reference ID: 2b-002-20140306

<sup>5</sup> Bradford City Centre Parking Study, August 2016

<sup>6</sup> Paragraph:001 Reference ID: 2b-001-20140306

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The Parking Study has assessed the existing need for parking and the potential future need for parking in the City Centre, and identified future strategy and policy directions for parking.

As part of the analysis undertaken in the Parking Study, there was an examination of the proposed site allocation currently in use as surface car parks to assess whether these would be required to meet existing and future need to car parking in the city centre. The results of the analysis shows that based on existing weekday car park occupancy, the consented development schemes and the future development assumptions (future development of AAP proposed allocated sites), sufficient public off-site car parking provision is forecast to be available.

The Parking Study also highlighted need to increase the modal share of the sustainable forms of travel accessing the City Centre. It was recommended that the early implementation of an active programme to manage parking demand and encourage mode shift towards non-car modes will reduce the demand for parking in the longer term and, as a result, the requirement for parking within the city centre. To encourage an increase in sustainable mode share, the study supports the delivery of the following sustainable transport improvements and actions, as put forward in the City Centre AAP:

- Bradford Forster Square Station Improvements
- Bradford Interchange Station Improvements,
- New Rail Provision
- Expand upon the committed City Connect Cycle Scheme
- Continue to work with City Region partners to support increased investment in the bus and rail services and infrastructure
- Continue to work with West Yorkshire Combined Authority on the Single Transport Plan

**What impact will the loss of surface car parking within the City Centre have, both individually and cumulatively, on the attractiveness of the City Centre to visitors, residents and commuters?**

### ***Council Response***

As stated in the answer to Q22. ,the results of the analysis shows that based on existing weekday car park occupancy, the consented development schemes and the future development assumptions (future development of AAP proposed allocated sites), sufficient public off-site car parking provision



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is forecast to be available. The Parking Study therefore demonstrates the loss of the surface car parks proposed for development will have no individual and / or cumulative impact upon the attractiveness of the City Centre, due to their being sufficient supply of alternative car parking for visitors, residents and commuters. The Council, in-line with the recommendations of the Parking Study, will continue to encourage modal shift to more sustainable modes of transport through the transport improvements put forward in the City Centre AAP.

### ***Council Response***

- 22. What up to date evidence is there that Bradford is “underserved in regard to its city centre retail offer”<sup>7</sup>? If so, does the AAP provide adequate flexibility and capacity for additional retail development within the plan period?**

### ***Council Response***

The delivery of the Broadway Shopping Centre has now absorbed the identified quantitative need, as presented in the Retail and Leisure Study (2013)[EB/034, ED/035, EB/036], for further comparison goods development, with the Centre providing medium to long term additional capacity.

The Council consider there is sufficient capacity for comparison retail to meet the identified quantitative need over the plan period to 2030.

The Council will therefore put forward a modification to amend the wording to reflect the current position in regards to retail capacity and demand.

- 23. Does the wording of Policy SL1 provide a clear, spatially distinctive approach to where unrestricted retail development would be appropriate within the City Centre and where the sequential test would be triggered for developments over 1500 square metres?**

### ***Council Response***

The Council is of the opinion Policy SL1 provides a clear, spatially distinctive approach to where unrestricted retail development would be appropriate within the City Centre. The Policy states 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 area, clearly

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<sup>7</sup> Paragraph 4.37 of the BCCAAP

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setting out a clear and spatially distinctive approach to where unrestricted retail can take place in the city centre.

In regards to the locally set floorspace threshold of 1,500m<sup>2</sup> for town centre uses, this relates to the wider city centre boundary and would be triggered for proposals on 1,500m<sup>2</sup> on the edge or outside this boundary, in line with Policy EC5 of the Core Strategy. The locally set threshold is based upon the work undertaken in the Retail and Leisure Study (2013), which states it will only generally be development of a scale greater than the 1,500m<sup>2</sup> threshold which will lead to a 'significant adverse' impact upon the City Centre, which could merit the refusal of an application for town centre uses.

### **On what basis has the boundary of the Primary Shopping Area (PSA) been drawn?**

#### ***Council Response***

The boundary of the Primary Shopping Area is based upon the work undertaken in the Retail and Leisure Study (2013, which states the proposed PSA has sought to assist in directing future retail development/investment. It still covers the main existing retail activity area but has been extended to cover the Westfield Broadway Centre site to positively encourage its implementation in the short term to encourage new retail investment in the city centre.

### **Is it appropriate to refer to development being acceptable in principle where it lies adjacent to the PSA?**

#### ***Council Response***

The Council is of the opinion a flexible approach to retail development within the city centre is necessary, especially in regards to the issues such as format and scale (NPPF Para 24). The Council recognises the limiting factors of focusing retail development within the historic core of the city centre, and is of the opinion this approach would still focus development within the centre, but also allow flexibility in regards to the availability of sites taking account of modern retail needs relating to format and scale.

### **Would retail development outside of the identified PSA be considered to be out of centre?**

#### ***Council Response***

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Yes.

### **24. Does Policy SL1 make adequate provision for other town centre uses, such as leisure or hotel uses?**

#### ***Council Response***

Policy SL1 should be read in conjunction with Policy EC5 of the Core Strategy. Policy SL1 sets out a number of criteria relating to town centre uses such as leisure and hotel uses. To ensure there is not duplication across the City Centre AAP and the Core Strategy, Policy SL1 of the City Centre AAP does not include further guidance in relation to centre uses. The AAP, however, does cover the appropriateness of leisure and other town centre uses within the Primary Shopping Area within Policy SL2.

### **25. To what extent is the wording of the criteria set out in Policy SL2 consistent with the Framework which requires that policies make clear which uses will be permitted in areas defined as primary and secondary frontages?**

#### ***Council Response***

The Council is of the opinion Policy SL2 clearly defines the primary and secondary frontages within the City Centre Primary Shopping Area, and establishing policy criteria which makes clear which uses will be permitted in such locations. This is consider consistent with Paragraph 23 of the National Planning Policy Framework and will ensure the vitality of the City Centre.

### **How does it relate to the provisions of the General Permitted Development Order?**

#### ***Council Response***

The General Permitted Development Order will still remain in place, with no Article 4 being issued within the City Centre to restrict its usage. Development which is not covered by the General Permitted Development Order, and thus requires planning permission, will be subject to the relevant policies within the City Centre AAP and the Core Strategy. The Council is unaware of any conflicts or misalignments between Policy SL2 and General Permitted Development Order.

### **What rationale was used to differentiate between the hierarchy of frontages and what was the rationale for defining the frontages in this location?**

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### ***Council Response***

Paragraph 23 of the National Planning Policy Framework (NPPF) states that in drawing up local plans, local authorities should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations. Also Annex 2, states that "Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses".

In formulating the Council's Policy SL2, while recognising the need for the policy to be restrictive, it was also considered that it should not be so rigid so as to exclude all non-retail uses – particularly those most likely to attract footfall and therefore capable of making a significant contribution to vitality and viability.

The Council undertook a survey of the streets within the Primary Shopping Area, mapping the streets in which the majority of premises have an active retail frontage and complimentary town centre uses (Use Classes A3 and A4); and those streets in which the majority of street were not active retail frontages and mainly occupied with other town centre uses. Those streets primarily consisting of active retail and complimentary uses (Use Class A3 and A4), with low vacancies, were then put forward for Primary Shopping Frontage. Those streets with a majority of premises with active non-retail frontages, and / or high vacancies were then put forward for secondary frontages.

The Retail and Leisure Study (2013) states the application of such frontage policy can often be counter-productive in terms of fostering activity and growth through other land uses, which still often add to the vitality of a town centre. However, the Council is of the opinion the Policy SL2 demonstrates sufficient flexibility to allow the delivery of complimentary non-retail uses which will enhance the vitality of the city centre.

The exception given banks, building societies, restaurants/cafes seeks to distinguish between uses that are 'directly related to a shopping trip' and all other non-retail uses.

### **26. Is there any tension between the objective of Policy CL3 to seek active frontages at the ground floor of new development within the**

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### **boundary of the City Centre AAP and the Policies SL1 and SL2 which seek to concentrate retail development within a constrained area?**

#### ***Council Response***

The Council are of the opinion Policy CL3 and Policies SL1 and SL2 are complementary and thus do not contain any tensions between them. All policies encourage the development of ground floor uses to ensure the vitality of the city centre with complimentary uses.

The primary objective of CL3 is to create active frontages across the city centre. Active frontages are important in order to create life, vibrancy and ensure activity over time. The contribution that active frontages can make to the quality of the built environment and creating sustainable communities for the future is recognised in best practice guidance. Well designed 'active' frontages add interest, life and vitality to the public realm. Policy CL3 does not restricted the use class of development in which an active frontage is being proposed as part of the proposal. The Council of the opinion Encouraging active frontages on the ground floor of developments will help ensure the vitality of the city centre and thus compliant with section 2. of the NPPF.

Any new development proposal will need to provide evidence of an active frontage at the ground floor level, however the use-class of that ground floor usage will still be subject to Policies SL1 and SL2 (other policies within the AAP and Core Strategy), where applicable.

#### *Shipley and Canal Road Corridor Action Area*

### **27. What role does Valley Road Retail Area have in the retail hierarchy? Is its role envisaged to provide capacity for large format bulky goods which could not be located within the Primary Shopping Centre? If so, is this reflected within the policy?**

#### ***Council Response***

The Valley Road Retail Area is identified an edge of centre location for Bradford City Centre. The Valley Road Retail area is identified as an edge of centre expansion area for larger scale retail and bulky goods for the City Centre which cannot be located within the PSA. When applying the sequential test for main town centre uses in Core Strategy Policy EC5, where the relevant centre is the city centre, if no preferable sites are

## **BRADFORD CITY CENTRE AREA ACTION PLAN AND SHIPLEY AND CANAL ROAD CORRIDOR AREA ACTION PLAN EXAMINATION**

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identified within the PSA or city centre boundary developers will be expected to consider the availability of sites within the Valley Road Retail Area before the local planning authority is likely to consider out-of centre locations. This is set out in the supporting text to the policy.

### **28. Is there duplication between Policy SE4 of the AAP and Policy EC5 of the emerging CS and the PPG<sup>8</sup>.**

#### **Council Response**

The council do not consider that there is duplication between Policy SE4 of the AAP and Core Strategy Policy EC5 and the PPG. The policy sets out the overall strategy for retail development in the SCRC and identifies locations within the SCRC, including Shipley town centre, the neighbourhood centre within the New Bolton Woods Site (NBW1) and Valley Road Retail Area where different scales and types of retail development will be acceptable

*Council  
Montagu Evans  
Highways England*

### **Matter 5: Employment**

*Whether the levels of employment proposed and subsequent allocations are justified by adequate evidence and whether these allocations are located so as to result in sustainable development.*

### **29. Is the level and distribution of employment land within both AAPs consistent with the emerging CS and justified by evidence?**

#### **Council Response**

The level and distribution of employment land within both AAPs is considered consistent with the emerging CS. The AAPs have been supported by robust evidence in accordance with NPPF paragraphs 158, 160 and 161. This includes the needs for all foreseeable types of economic activity over the plan period and the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. The Council has undertaken an Employment Land Review (ELR) (2010) (EB026) and ELR Update (2011) (EB/027).

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<sup>8</sup> PPG Paragraph 001 Reference ID: 2b-001-20140306

## **BRADFORD CITY CENTRE AREA ACTION PLAN AND SHIPLEY AND CANAL ROAD CORRIDOR AREA ACTION PLAN EXAMINATION**

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The SCRC Strategic Development Framework (2013) (SCRC-SD-038) provides more detailed evidence on economic development activity and development options which informed the preparation of the SCRC Issues and Options Report. The Strategic Development Framework (SDF) was supported by substantial baseline data including the needs for economic development and the suitability of land in the SCRC to meet identified needs. This included a Socio-Economic, Housing and Commercial Market Assessment paper, which assessed prospective demand for retail, office, industrial assessments, development interest and the relative performance of the Canal Road Corridor and Shipley Town Centre.

The SCRC AAP does not identify any specific employment sites as no sites were identified through the preparation of the AAP and relevant evidence. The SCRC AAP will support economic development within the AAP as set out in Policy SCRC/SE1. The SCRC identifies employment uses as part of mixed use sites within and adjacent Shipley Town Centre, Dockfield Road and New Bolton Woods (NBW1).

In line with paragraph 34 of the NPPF, all sites in both AAPs which include employment uses are located within the main urban area of the Regional City of Bradford in accessible locations which present opportunities to access jobs by sustainable transport modes, including walking, cycling, bus and train. These sites will also help to deliver a balance of land uses within the AAP areas and minimise journey lengths for employment in line with NPPF paragraph 37.

### *Bradford City Centre Action Area*

#### **30. What evidence is there that the levels of employment set out in the emerging CS will be delivered within the AAP over the plan period, and that such development will be financially viable?**

##### ***Council Response***

Policy EC3 of the Core Strategy sets out the planned requirement for 135 ha of employment land within the district will be distributed between the different parts of the District, with 100ha being delivered within the City of Bradford. The office floor space projection of 76,000m<sup>2</sup> to be delivered through identified sites within the City Centre AAP will contribute approximately 7.6 hectares to the overall 100ha target. Although this figure does appear small, due to the employment densities of the office development planned for in the AAP, the contribution towards the creation of Full Time Equivalent (FTE) jobs is significant.

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The proposed sites including office development within the City Centre AAP are considered financially viable over the plan period. Details of the financial viability of such schemes can be found within the Area Action Plan Viability and Delivery Report [BCC-SD-028] and Cushman and Wakefield's Appendix 2 Cushman and Wakefield response to AAP EiP queries [PS-A001b(ii)].

### **How important are the site specific office developments identified within the AAP to the soundness of the plan?**

#### ***Council Response***

Proposed site allocations which include the delivery of office floor space within the City Centre AAP are considered important to the soundness of the plan. The proposals for office development will assist in building strong and competitive economy (paras 18 - 22 of the NPPF) as they are a key element of the clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth. The Council recognise and seek to address potential barriers to investment, through work under taken by Cushman and Wakefield on development plan viability; and the various evidence base documents which seek to address any barriers to investment including infrastructure [BCC-SD-022. BCC-SD-023. BCC-SD-024] and the delivery of housing.

The enabling the delivery of office space through site allocations will also assist in ensuring the vitality of the City Centre (paras 23- 37 of the NPPF) by allocating a range of suitable sites to meet the scale and type of office development needed in Bradford City Centre.

The City Centre is also considered the most accessible location by public transport within the District. Through the delivery of office floor space (and the resulting FTE job opportunities) and new residential accommodation, the plan will promote sustainable transport (paras 29- 41 of the NPPF) by putting forward a spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.

### **Is adequate flexibility built within Policy B1?**

#### ***Council Response***

Policy B1 is considered to contain adequate flexibility. Table 3 within the Monitoring Framework identifies how Policy B1 will be monitored. Policy B1



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will also be monitored against that of Policy EC2 of the Core Strategy and the annual target of delivering 2879 jobs per annum. It should also be noted the Council is committed to updating the Employment Land Review to ensure adequate levels of employment land are currently being proposed through the Local Plan.

### **31. How do the sites identified for employment uses fit in with the wider strategy for the City Centre?**

#### **Council Response**

As part of the overall strategy for the City Centre, site identified which include office development have been focused within the Central Business and Leisure District. This area has also been identified for the concentration of leisure developments as the two land uses are considered complementary. The concentration of employment uses within the Central Business and Leisure District is further complimented by the close proximity to sustainable transport modes including Forster Square Railway Station and the Interchange Bus and Railway Station; this will ensure they are high accessible by public transport from within and beyond the Bradford District.

Sites identified for residential development are also within walking distance to identified employment opportunities, thus reducing the need to travel through balancing housing and employment provision.

#### *ShIPLEY and Canal Road Corridor Action Area*

### **32. Is the identification of Canal Road Employment Zone as an area in which Policy EC4 of the CS will be applicable, justified by evidence?**

#### **Council Response**

The SCRC AAP has been supported by robust evidence in accordance with NPPF paragraphs 158, 160 and 161. This includes the needs for all foreseeable types of economic activity over the plan period and the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.

The Council has undertaken an Employment Land Review (ELR) (2010) (EB026) and ELR Update (2011) (EB/027). The ELR update (EB/027) identifies the Canal Road Corridor as a priority regeneration area, which has potential for attracting new inward investment, retaining existing employers and is a location that makes and important contribution to employment land supply in the District.

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The SCRC Strategic Development Framework (2013) (SD-038) provides more detailed evidence on economic development activity and development options which informed the preparation of the SCRC Issues and Options Report. The Strategic Development Framework (SDF) was supported by substantial baseline data including the needs for economic development and the suitability of land in the SCRC to meet identified needs. This included a Socio-Economic, Housing and Commercial Market Assessment paper, which assessed prospective demand for retail, office, industrial assessments, development interest and the relative performance of the Canal Road Corridor and Shipley Town Centre.

The SDF emerging development framework (SD-038, page 55-61) proposed enhanced industrial areas to the west of Canal Road and employment uses and bulky goods retail in the Canal Road Employment Area as a continuation of its present functions. Canal Road Employment Area was identified as an area within the City Centre Fringe that offered short and medium term development opportunities. The SDF sets out that *"continued development in the Canal Road Employment Area, which has been successful in attracting new commercial development over the past 15 years, will help to retain and nurture this important component of the local and city economy."* (SD-038 page 60).

In summary the SCRC SDF emerging development framework (SD-038) for the Canal Road Employment Area did not propose to challenge the established character of this part of the SCRC as an employment area. It proposed that existing land uses such as warehousing, industrial units, car showrooms and bulky goods retail are either retained or similar uses encouraged where opportunities arise, especially on derelict land.

The proposed main modification (MM70) to Core Strategy Policy EC4 Criterion D (Identifying Strategic Employment Zones) recognises that there are key locations within the main urban areas where existing industrial and business uses predominate and the traditional employment activities of these areas will continue to play an important role in providing jobs for their surrounding communities.

It is considered that the evidence in the ELR and SCRC SDF justifies the identification of the Canal Road Employment Zone under Core Strategy EC4 Criteria D.

### **Matter 6: Infrastructure**

## **BRADFORD CITY CENTRE AREA ACTION PLAN AND SHIPLEY AND CANAL ROAD CORRIDOR AREA ACTION PLAN EXAMINATION**

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*Issue 1: Whether the approach to identifying and delivering the requisite infrastructure to support the development and regeneration objectives of the plan is fully justified, based on up to date and reliable evidence, deliverable, positively prepared and consistent with the policies of the emerging CS and the latest national guidance and wider cross boundary requirements.*

### **33. Are the Infrastructure Delivery Plans sufficiently up to date, and complete to provide an effective understanding of the infrastructure which is required to support the AAPs?**

The council considers that the contents of the Infrastructure Delivery Plans (IDP) are sufficiently up to date, and complete to provide an effective understanding of the infrastructure which is required to support the AAPs. This has been clearly highlighted as part of the AAP Legal Compliance Self-Assessment Checklist (BCC-SD-015 and SCRC-SD-016) and the Local Plan Soundness Self-Assessment Checklist (BCC-SD-015 and SCRC-SD-015) reports.

The IDPs also provide appropriate evidence and information on the AAPs infrastructure needs and they are soundly based on the infrastructure assessment undertaken as part of preparing the relevant Plan (AAP) in accordance with Paragraph 16 (Reference ID: 25-016-20140612) of the Government's National Planning Practice Guidance (NPPG) and Paragraphs 162 and 177 of the NPPF.

The two reports have been prepared with support from the key infrastructure delivery partners who regularly assessed and updated all relevant infrastructure information and helped the Council identify the means by which the required levels of infrastructure can be delivered, by whom and to what timescales. The IDPs thus provide the most up to date information on infrastructure requirements to support the envisaged growth in the AAP area and, as far as they are able, establish the costs of delivery and possible methods of funding.

The documents therefore are based on the Council's and relevant infrastructure provider's most up to date plan/programme/schemes at the time of preparation of the report and designed to be able to respond to changing infrastructure needs and circumstances over the AAP plan period. Consequently the Council treats the IDPs as 'live' documents and seek to update the reports regularly as new information re: infrastructure needs and delivery arrangements come forward.

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The submitted version of the IDPs (April, 2016) (BCC-SD-022 and SCRC-SD-027) are the latest version of the reports which have taken into account the most up to date available information and are prepared in collaboration with the relevant infrastructure providers. The IDPs also incorporate all the infrastructure and funding information referred within the Local Infrastructure Plan (LIP) (Document Reference: EB-044), and its subsequent updates, which has been produced in support of the Local Plan Core Strategy outlining a district wide short-medium-long term approach for infrastructure delivery; and as such IDPs should be read in conjunction with the latest version of the LIP.

### Social infrastructure

#### **34. Is there appropriate certainty that adequate levels of school, health and social infrastructure provision will be provided in a timely fashion and at appropriate suitably accessible locations so as to support the delivery of the growth proposed within the AAPs?**

The IDPs give the most up to date information on the likely social infrastructure requirements to support growth in the AAP areas and, as far as they are able, establish the costs and possible methods of funding. However, given the time period of the plan, not all social infrastructures will have specific identified location or delivery timescale at this stage. The AAPs themselves will provide the steer and inform various infrastructure investment plans in the future.

The Council is of the view that when Local Plans including the AAPs give certainty to the location, scale, and timing of future housing and economic development, infrastructure is likely to be far easier to plan for, secure funding for and to prioritise for by both the Council and all other relevant social infrastructure providers (e.g. NHS). Moreover, once specific site allocations are confirmed the necessary infrastructure will then be identified and costs estimated in order that their provisions can be tied into and phased with the development itself.

Future need of social infrastructure as identified within the IDPs (Document Reference: BCC-SD-022 and SCRC-SD-027) has been broadly based on the analysis of infrastructure provider's/agency's forward plans and investment strategies at the time of preparation of the reports. All planned social infrastructure is set out in the Infrastructure Delivery Programme of the IDPs (Section 13). Section 12 (Larger Sites Information and Analysis) of the reports further appraise the likely impacts of future developments on various infrastructure elements including health and education provisions.

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At this stage the level of information available and the extent of engagement by social infrastructure providers are such that the Council is able to place confidence on the prospects of successful delivery of the required level of social infrastructure in a timely fashion and at appropriate locations that would be suitably accessible by future residents of the area. The Council's response (Document Reference: PS-A005) to the Inspector's initial observation on proposed education provision to serve the two AAPs over the plan period provides an example of such deliberation by the Council and its partners. All the key agencies/service providers have not raised major objections to the scales of development that the AAPs are proposing, nor its distribution. Overall, it is considered that there are no particular social infrastructure requirements and/or delivery issues arising from the development proposed in the AAPs which have not been appropriately planned for and which cannot be met either within or in areas outside but accessible to the two AAP boundary areas.

The IDPs will be updated by the CBMDC Planning Service when necessary, to incorporate partners' future plans. Consequently, these reports remain as a 'live' document which should be reviewed and updated taking account of all the socio-economic, environmental and demographic changes as they come forward.

In terms of organisational set up, the Council has recently been through a major restructure and introduced a dedicated Transport and Infrastructure Delivery team with Team Leader and Officers to oversee the delivery and monitoring of infrastructure programmes across the district. The Team is currently working on setting up an 'Infrastructure Planning Group' with the responsibility to review any future iteration of the IDPs and also to develop an 'Infrastructure Project Tracker' to monitor potential infrastructure requirements emerging from new developments. With all these arrangements in place the Council is confident that there will be continued discussions between all infrastructure providers and concerted actions by all parties to establish mechanisms that will effectively address social infrastructure issues and deliver the required provisions in a sustainable manner.

### **35. Should individual sites for critical social infrastructure be identified on the Policies Map?**

Based on the evidence of future need for social infrastructure as identified within the IDPs (BCC-SD-022 and SCRC-SD-027) the Council do not consider it necessary to identify sites for critical social infrastructure on the Policies Map. It is considered that the need for social infrastructure

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including secondary schools and hospitals to support the AAPs can be provided through new and existing sites outside of the two AAP areas. No suitable individual sites for larger scale social infrastructure such as secondary schools or hospitals have been identified within the two AAPs through the preparation of the plans.

The AAPs identify town centre boundaries for the City Centre, Shipley town centre and a new Neighbourhood Centre within the New Bolton Woods Site (NBW1). It is considered these centres will be able to accommodate any demand for smaller scale social and community infrastructure (such as health and community facilities) arising over the plan period. The AAPs also contain policies (SCRC/SE5 and BCC/CL3) which support the delivery of smaller scale social and community infrastructure (such as health and community facilities) within the city/town centres/neighbourhood centre.

Within the SCRC AAP supporting community infrastructure, including a new primary school has been identified to support the delivery of larger scale housing sites including the New Bolton Woods site (NBW1). This is in line with NPPF paragraph 38 which sets out for larger scale residential developments, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities on site and key facilities such as primary schools and local shops should be located within walking distance of most properties.

Within the NBW1 site it is not considered necessary to identify any specific individual sites on the policies map as the broad locations for supporting social infrastructure, including the new primary school and health facilities have been identified through the New Bolton Woods Masterplan and the site allocation statement for NBW1 sets out the broad locational criteria for the location of any new primary school and community infrastructure as part of the development. It is considered that this provides the necessary flexibility, which will allow the detailed consideration of the type and exact location any new primary school provision and other supporting social infrastructure within the site (which is required under Policy SCRC/HS3) to be determined as part of the detailed planning permission.

### Transport Infrastructure

#### **36. Has adequate transport capacity, (including public transport improvements) been appropriately planned for, including on the Strategic Road Network?**

#### ***Council Response***

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The Council are of the opinion adequate transport capacity has been appropriately planned for within both Area Action Plans.

In 2010, a Transport Study was undertaken to examine the existing and future transport infrastructure of the Bradford District, including proposals set out within the Core Strategy. As a result of the work undertaken at this strategic district level in support of the Core Strategy, the two Area Action Plans have been subject to individual Transport Studies [BCC-SD-024 and SCRC-SD-029]. The studies present an analysis of the impact of forecast demands on existing networks and identify a package of potential interventions, both physical and non-physical, that could be delivered to support growth and accommodate additional demand across both Area Action Plans. The transport interventions identified have been taken forward in the AAP's and presented on the Policies maps, and the relevant transport chapters, in each Plan.

Since the transport studies were produced the Government has produced a revised national traffic growth forecast which in the case of Bradford district has reduced the level of expected growth in car usage. In addition to this the new Northern rail franchise will provide additional rolling stock and new direct rail services from Bradford across the North of England which will provide increased capacity.

**What are the potential implications of the proposed developments on the transport infrastructure both within and outside of the Plan area and how have they been addressed within the Plans?**

### ***Council Response***

The potential implications of the proposed developments on the transport infrastructure have been assessed through the Transport Studies [BCC-SD-024 and SCRC-SD-029] for each AAP. The Transport Studies also put forward a number of interventions to address the potential implications, with an assessment of each intervention also set out within the 'Study.

The transport interventions identified have been taken forward in the AAP's and presented on the Policies maps, and the relevant transport chapters, in each Plan.

**Is the approach fully justified with evidence, effective, deliverable and consistent with the emerging CS and national policy?**

### ***Council Response***

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The Council is of the opinion the approach taken to transport interventions is fully justified with evidence, effective, deliverable and consistent with emerging Core Strategy and national policy. The transport interventions are based upon the recommendations put forward in each individual Transport Study [BCC-SD-024 and SCRC-SD-029] for the Area Actions Plans.

The Policies set out in the Transport and Movement Chapter of the emerging Core Strategy has formed the strategic framework for transport policies within the AAPs. The Background Paper [BCC-SD-015 and SCRC-SD-014] for each AAP sets out the alignment of the AAP policies with the emerging Core Strategy policies and objectives, and themes of the NPPF.

**Is there adequate up to date evidence to demonstrate that the infrastructure will be implemented in a timely manner to support the proposed development and the strategic objectives? How it will be financed, and by whom?**

### ***Council Response***

The potential implications of the proposed developments on the transport infrastructure have been assessed through the Transport Studies [BCC-SD-024 and SCRC-SD-029] for each AAP. The Transport Studies also put forward a number of interventions to address the potential implications, with an assessment of each intervention also set out within the 'Study.

In addition the council considers that the contents of the Infrastructure Delivery Plans (IDP) (BCC-SD-022 and SCRC-SD-027) are sufficiently up to date, and complete to provide an effective understanding of the infrastructure which is required to support the AAPs. The IDPs provide appropriate evidence and information on the AAPs infrastructure needs and they are soundly based on the infrastructure assessment undertaken as part of preparing the relevant Plan (AAP) in accordance with Paragraph 16 (Reference ID: 25-016-20140612) of the Government's National Planning Practice Guidance (NPPG) and Paragraphs 162 and 177 of the NPPF.

### **City Centre AAP**

The current focus on new transport infrastructure in the city centre has been based on improving sustainable access into the city.

The Council in conjunction with Leeds City Council and the West Yorkshire Combined Authority was successful in attracting £60m funding across West Yorkshire for cycling infrastructure. This is being delivered over two phases. As part of phase one a new 23km segregated cycle path has been



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constructed between Leeds and Bradford at the cost of £30m. Phase two which will be delivered in 2017 includes a £2.5m project to provide improved segregated cycling infrastructure from the city centre to the Stanley Road junction along the Canal road corridor.

Through funding from the West Yorkshire plus Transport Fund (WYTF) the Council in conjunction with partners such as Network Rail, Virgin East Coast Trains and Northern Rail is seeking to improve Bradford Forster Square rail station. Initial concepts for Forster Square include the new lifts, a wood and glass roof and the provision of toilets, waiting rooms and improved retail facilities. The scheme will cost in the region of £15m and completed by 2021 at the latest.

Master planning work has just commenced on Bradford Interchange. It is recognised that the redevelopment of both the bus and rail station has the potential to complement other key public sector regeneration projects. These include the public service hub at Jacobs Well, No 1 City Park and the proposed Bradford City Centre swimming pool. The master planning work will also consider how the road network operates in the immediate area which may provide opportunities to divert traffic away from Hall Ings. Depending on the size and scope of the eventual scheme funding will be sought from the WYTF, third party developers and central Government. In the short term new direct rail services from the Interchange to Manchester Airport, Liverpool, Chester, Nottingham and Sheffield will be launched in the next three years. Opportunities to provide quick win improvements at the rail station are to be explored with Northern Rail to complement the introduction of new services from the station.

In terms of new and improved road infrastructure the Council has secured provisional funding from the WYTF to improve Tong Street and Harrogate Road / New Line which is in addition to provisional funding for the Canal Road corridor (covered in the AAP?). It is recognised that these are outside of the city centre but are indicative of the Council's aspirations to improve its road network. Within the city centre a new highway link between Westgate and Thornton Road is partly funded. £7 million has been secured from Council capital funds towards these improvements and the Council is seeking to secure the remaining £4.1m of funding from future funding bids.

### SCRC AAP

Table 2: Key Transport Measures on page 85 of the SCRC AAP identifies key transport measures, interventions and delivery funding/mechanisms. It is

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considered that this demonstrates how and when projects are likely to delivered and funded.

The council in conjunction with partners is seeking to deliver improvements along the Bradford Shipley Corridor through funding from the West Yorkshire plus Transport Fund (WYTF). The West Yorkshire plus transport fund identifies the Bradford to Shipley Corridor Improvements project which comprises a number of interdependent junction and corridor improvements between Bradford City Centre and Shipley. The project is at an early stage of development and may ultimately be delivered as a series of separate phases rather than as a single scheme. The decision on this approach will be based on the outcome of the Gateway 1 assessment and demonstration of appropriate GVA benefits for the packages of work. The scheme would comprise the following items of work:

**Bradford to Shipley Corridor Improvements** (Total Scheme Value: £46m)

The project

- Modification of the junctions of Otley Road / Valley Road and Bradford Road (including Network Rail crossing) (Phase 1)
- Gaisby Lane / Canal Road junction upgrade (Phase 2)
- A650 Canal Road Corridor dualling between Kings Road and Stanley Road junctions (Phase 2)
- Fox's Corner junction improvements and Otley Road approach bus lane (Phase 3)
- A650 Manningham Lane Quality Bus Corridor Improvements (Phase 4)

**37. Specifically, is there any conflict between proposed levels of growth and congestion? If so, is there appropriate evidence to demonstrate how any potential adverse impacts, including to health, will be mitigated?**

### ***Council Response***

The Transport Studies produced in support of the Area Action Plans have not identified congestions as an overriding issue as a result of proposed levels of growth in the Plan areas. Indeed since the transport studies were produced the Government has produced a revised national traffic growth forecast which in the case of Bradford district has reduced the level of

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expected growth. The Transport Studies do put forward a number of interventions which will assist in relieving existing, and potentially future, levels of congestion. These have been taken forward as part of the transport interventions in the AAPs.

With regards to health the Council successfully bid for £400k from the Clean Vehicle Technology Fund which allowed it to fit 25 buses with equipment that reduced vehicle emissions by 90% improving air quality. Through the city connect cycle programme new segregated cycle lanes will connect the city centre to the North, South and the East. A feasibility study is being undertaken to improve cycling routes to the west of the city centre. The Council is actively promoting mass participation in cycling with events such as Skyride which sees the city closed to vehicle traffic for the day.

**38. In line with paragraph 124 of the Framework, how has the presence of the Air Quality Management Areas been considered in the allocation of sites for development, and the provision of infrastructure? What are the implications of the AQMAs to the policies of the AAPs?**

### ***Council Response***

Air Quality Management Areas are only present within the City Centre AAP area. The Transport Study produced in support of the City Centre AAP and highlights air quality management as a key issue within the centre. There are two Air Quality Management Areas (AQMA) located outside but within close proximity to the SCRC AAP boundary.

The approach of the AAPs is to address air quality impacts through a range of measures including; minimising the cumulative impacts arising from planned development by securing reasonable emission mitigation, minimising trips generated by vehicles by locating development in accessible locations supported by sustainable transport options, and including air quality mitigation as part of sustainable design and strategic planning of green infrastructure.

Air quality management is taken into account in regards to the future growth in traffic and the interventions put forward. Both AAPs make reference to the Council's Low Emission Strategy and links to Core Strategy Policy EN8. Development proposals that have the potential to adversely impact on air quality will be required to incorporate measures to mitigate or offset their emissions and impacts, in accordance with Core Strategy Policy EN8 and the Low Emission Strategy

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The City Centre AAP addresses the issue of Air Quality Management within the Transport and Movement Chapter (paras 4.95 – 4.97) and within the Built Form Chapter (para 4.121), including Policy BF3 which requires applicants to ensure appropriate consideration has been given to the Bradford Air Quality Action Plan (or replacement guidance) and necessary mitigation measures incorporated into schemes.

It is also worth noting under BCC AAP Policy M4 an SCRC AAP Policy SCRC/ST3: applicants are required to submit a Transport Assessment in support of any planning application within the City Centre and will be assessed against policy TR1 of the Core Strategy. As part of the transport assessment, should there be any likely impact upon an AQMA an assessment of the likely associated environmental impacts of transport related to the development, particularly in relation to proximity to environmentally sensitive areas (such as air quality management areas or noise sensitive areas) [NPPG Para 015]. It is therefore considered that the AAPs take into account the presence of AQMA and the approach within both plans is in line with NPPF paragraph 124.

### **39. How do the Plans support a pattern of development which facilitates the use of sustainable modes of transport to widen choice?**

#### ***Council Response***

The Council consider both the City Centre and Shipley and Canal Road Corridor to highly accessible by public transport, pedestrian and cycling linkages throughout the boundary areas. Focusing the level of growth proposed within each AAP area ensures there is a wide choice of sustainable transport available.

Where sustainable transport modes are not readily accessible, the AAP's put forward a number of transport interventions to address these. These transport interventions can be found within the relevant transport chapters and Policies Maps of each AAP. Further detail regarding pedestrian and cycling improvements can be found within the Policy SCRC/NBE1 of the SCRC AAP and Policy M6 of the City Centre AAP.

It should also be noted that allocation proposal statements within both AAP put forward a number of sustainable transport improvements for the scheme and their wider benefits for the surrounding area.

#### **Are the transport sites, routes and specific proposals which are identified within the plans justified by adequate evidence and**

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### **consistent with the recommendations contained within the supporting documents<sup>9</sup>?**

#### ***Council Response***

The majority of transport interventions put forward within the AAP's have been assessed through the Transport Studies and Green Infrastructure Studies and are thus considered justified by adequate evidence and consistent with the recommendation of supporting documents.

Transport interventions put forward, which have not been assessed by the Transport Study, include the Forster Square Railway Station and Interchange Railway Station improvements. However, the proposed station improvements are supported by detailed work undertaken on the Stations Masterplans. Detailed design work has been commissioned for Forster Square station and a comprehensive masterplan will be developed over the next year covering Bradford Interchange and the surrounding area.

In regards to the tram-train route depicted on the Policies Map, WYCA are developing the concept of a metro style public transport network to be funded by the WYTF. This is looking at a number of corridors which includes Dewsbury – Bradford – Leeds Bradford Airport. The proposals for the transport network include both tram-train and bus rapid transit schemes. The Council is also pushing for a fixed link between the city centre and Leeds Bradford airport. If either scheme were to be delivered it will operate between Forster Square and the interchange rail stations to/from the airport and requiring the provision of new infrastructure. This work is on-going and timescales are not available.

In regards to the extension to the City Connect cycle into the heart of the City Centre, this is part of on-going work being undertaken at West Yorkshire Combined Authority.

### **Is sufficient emphasis given to promoting the use of means of transport other than the car?**

#### ***Council Response***

Both Area Action Plans put great emphasis on promoting the use of sustainable transport modes. The transport chapters of both AAP's put forward a number of policies to encourage developers to consider the use of

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<sup>9</sup> Transport Study in Support of the Shipley and Canal Road Corridor AAP May 2015; Transport Study in Support of Bradford City Centre AAP, May 2015

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transport modes other than car in proposed development schemes. Policies within these chapters encourage the walking and cycling through new and improved cycle and pedestrian routes; minimised car parking; improvements to railway stations and access to travel interchanges; and new green / blue infrastructure, combined with biodiversity enhancements, to improve the quality of the cycling / pedestrian environment.

Detailed transport design guidance is provided within the each allocation proposal statement, presenting sustainable transport improvements which will benefit not only the site but also the wider area.

The Council is also committed keeping an up to date Transport Study and Green Infrastructure Study for each AAP area. This will ensure the regular monitoring of proposed sustainable transport interventions, and how these can be enhanced and expanded.

### **40. Are the individual site allocations overly prescriptive with reference to parking levels?**

#### ***Council Response***

The car parking levels set out within site allocation statements are indications of what is expected to be delivered on site. Should an applicant wish to challenge this assumption, sufficient evidence identifying a greater or lesser car parking level would need to be submitted in support of the application. The Council would review this during the course of examining the proposal in consultation with Highways Development Control.

The Council are of the opinion this is a flexible approach and allows for contingency should it arise.

It should be noted that the prescribed parking levels detailed within the allocation statements are based upon those with Appendix 4 of the emerging Core Strategy.

#### *Bradford City Centre Action Area*

### **41. How does Policy M1 provide adequate certainty as to how and where pedestrian severance should be overcome?**

#### ***Council Response***

Policy M1 sets out a number of criteria to which will be applied to overcoming any identified pedestrian severance issues within the City Centre. The Transport Study [BCC-SD-024] does not specifically identify

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any 'severance' issues, but does raise a number of potential conflicts between car and pedestrian movements. The transport study has identified pedestrian / car conflicts on Westgate, Godwin Street / Sunbridge Road, Kirkgate Hall Ings and Bridge Street. The transport improvements put forward in Policy M3 look to address these through the schemes identified within the Policy and the Policies Map.

In areas where specific conflicts / severance have not yet been identified, Policy M1 (A) puts forward a number of criteria which will look to address this issue. Part B of Policy M1 (B), also puts forward a number of priority routes which the Council consider will address issues of car / pedestrian conflicts and severance.

### **42. What impact will the requirement in Policy M3 for underground or multi decked car parking set out within a number of designated sites have on the viability of development within the City Centre?**

#### ***Council Response***

The Council's strategic priority across all development sites is to minimise the level of car parking delivered as part of any proposed scheme. Should the need for car parking be identified, the priority will be basement level, in courtyards and / or multi-storey structures. The viability of the delivery of such structures will be assessed at the planning application stage.

### **43. A number of individual site allocations result in the loss of public surface car parking. What impact will this have on the viability of development within the town centre with particular reference to the Council's aspiration to improve the retail and leisure draw of the City?**

#### ***Council Response***

As stated in the answer to Q22. ,the results of the analysis shows that based on existing weekday car park occupancy, the consented development schemes and the future development assumptions (future development of AAP proposed allocated sites), sufficient public off-site car parking provision is forecast to be available. The Parking Study therefore demonstrates the loss of the surface car parks proposed for development will have no individual and / or cumulative impact upon the attractiveness of the City Centre, due to their being sufficient supply of alternative car parking for visitors, residents and commuters. The Council, in-line with the recommendations of the Parking Study, will continue to encourage modal

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shift to more sustainable modes of transport through the transport improvements put forward in the City Centre AAP.

Taking account of the sufficient identified levels of car parking available for existing and future demand, the Council consider there will be no impact upon the viability of development within the City Centre.

#### **44. What is meant by 'could/should' within Policy M4?**

##### ***Council Response***

The Council propose to delete the word "could" from Policy M4 to ensure the policy is clear in its wording.

#### **What is the justification for the requirement that a transport assessment be submitted with all planning applications in the City Centre?**

##### ***Council Response***

The justification for the requirement that a transport assessment be submitted with all applications in the City Centre is based upon compliance with the NPPF (para 32). All developments in the City Centre are likely to generate significant amounts of movement and thus should be supported by a Transport Statement or Transport Assessment.

##### ***Shipley and Canal Road Corridor Action Area***

#### **45. Is the Shipley Eastern Relief Road referred to within the emerging AAP the same proposed route as the Shipley Eastern Link Road referred to within Policy BD1 of the emerging CS? Is it appropriate that the proposed route of the key transport measure, the Shipley Eastern Relief Road (SERR) be described as an indicative route? Is the route justified by evidence, deliverable within the Plan period and is the protection afforded by Policy ST2 consistent with the emerging CS and national policy?**

##### **Council Response**

Yes. The Shipley Eastern Relief Road (SERR) identified in the SCRC AAP is the same as the Shipley Eastern Link Road referred to in Policy BD1 of the emerging Core Strategy. The SERR was previously identified as a key element of Connecting Airedale – Stage 4, to relieve congestion in Shipley town centre by creating a bypass to the east, connecting the A6037 Valley Road/Canal Road and A6038 Otley Road. The Council has identified an



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indicative alignment for the scheme, and further detailed feasibility work will need to be undertaken to inform the future delivery of the scheme

The route is described as 'indicative' as detailed proposals for the route have not been undertaken at the time of writing the plan. The indicative route is based on the most up to date evidence provided by the Council's highway department in regards to the most likely route the road will take developed as part of the Connecting Airedale proposals. However, as any final route is still dependent on detailed feasibility work it is considered appropriate to refer to the route as indicative. The route is shown as indicative to provide a degree of flexibility to allow development proposals to proceed, while ensuring they are designed to accommodate an alignment which enables the future implementation of any scheme.

The delivery of the SERR is still a longer term ambition for the Council and the West Yorkshire combined Authority (WYCA), however it is considered unlikely that the scheme will be delivered in the first ten years of the AAP due to the complexity of the scheme and competing priorities for major scheme funding. The future delivery of the scheme will be considered by West Yorkshire Combined Authority (WYCA) under the terms of the Growth Deal agreed in July 2014. However, it will be important to ensure future development safeguards a route through the AAP area between Valley Road and Otley Road to enable the future delivery of the scheme.

The SCRC AAP is supported by a transport study (SCRC SD/029). The Transport Study identifies that the SERR is a medium/longer term intervention which is not in itself required to accommodate future growth identified in the AAP but aims to address issues around safety and accessibility and support future growth in the rest of the District. The study indicates the Council should continue to support Connecting Airedale initiatives and, in particular, safeguard a route for the Shipley Eastern Relief Road. Funding to develop this scheme will be pursued as and when opportunities arise.

The AAP therefore includes policy ST2 to safeguard a route to enable the future implementation of the scheme, in line with Core Strategy Policies BD1/D4 and BD2/C and ID5/B. It is considered that this approach is consistent with NPPF paragraph 41 which states that Local planning authorities should identify and protect, where there is robust evidence, routes which could be critical in developing infrastructure to widen transport choice.

Further feasibility studies will be expected to be undertaken to inform any detailed proposals for delivering the Shipley Eastern Relief Road over the plan period. As set out in paragraph 4.5.52 of the SCRC AAP any significant changes in terms of the line of the route or need for compulsory purchase powers will result in an early review of the AAP.

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## *Green and Blue Infrastructure*

*Issue 2: Whether the policies relating to green and blue infrastructure set out in the AAPs are effective, realistic, deliverable, justified by evidence and whether the proposals can be financed over the plan period?*

**46. In line with Paragraph 154 of the Framework is there adequate detail, within both the planning policies of the AAPs and the individual development proposals to provide certainty as to where the green and blue infrastructure should be provided, who will implement it, and how and when it will be financed and delivered?**

### **Council Response**

Both AAPs include policies on Green Infrastructure. These have been supported by evidence in the AAP Green infrastructure Studies and Ecological Assessments, in line with NPPF paragraphs 114 and 165. It is considered both plans provide sufficient detail both within the policies, Green Infrastructure Frameworks and relevant site allocations. The AAPs policies and supporting text identify the key green infrastructure interventions for each AAP. The Green Infrastructure concept plans in both AAPs are indicative and provide a strategic approach in the plans for creation and enhancement and management of networks of biodiversity and green infrastructure across the AAP areas. Green infrastructure and ecological priorities are identified in Sub Area Development Frameworks and relevant site allocation statements where relevant.

Within the SCRC AAP there are larger scale development sites which are identified in the Green infrastructure Study which provide the opportunity to deliver new and enhanced green infrastructure assets as part of future the development. These sites include New Bolton Woods (NBW1), Bolton Woods Quarry (BWQ1) and Shipley East (SE1). These sites are identified on the policies map and further detail on green infrastructure enhancements are set out in the relevant site allocation statements.

In order for the plans to be flexible the AAPs are not prescriptive in setting out detailed green infrastructure proposals. The AAP Green Infrastructure studies provide further details of potential proposals that will inform any detailed proposals for green Infrastructure as part of a development or any strategic projects. This will enable the most appropriate intervention to be delivered at the time taking into various factors including site specific characteristics, layout, topography, ecology, viability and feasibility. The consideration of site specific details within a development such as detailed

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green infrastructure strategies or design green shall be undertaken during the planning application stage.

Strategic Green Infrastructure projects will be delivered through CIL and other funding sources and any on-site provision required by AAP or Core Strategy policies will be delivered through planning obligations.

**In order to provide clarity should the location and routes of the identified green and blue infrastructure, such as the proposals to reinstate the Canal and the Bradford Beck be shown on the Policies Map?**

### **Council Response**

The Bradford Beck is identified as a key waterway and green infrastructure asset under Policy SCRC/NBE2. The Bradford Beck is identified on the SCRC AAP policies map due to the opportunities to enhance the environmental quality of the Bradford Beck, including the re-naturalisation of the Beck, where appropriate and feasible, identified in the Green Infrastructure Study, Ecological Assessment and Bradford Becks Catchment management plan.

The supporting text to the policy identifies the key sites for enhancing the Beck include New Bolton Woods (NBW1), Shipley East (SE1), Dockfield Road North/South (DF4/DF55) and opportunity for re-naturalisation of the Beck is within the Centre Section of the AAP. It is considered that the policy provides sufficient clarity on the route and locations for enhancements, and the criteria for enhancement projects without being too prescriptive. Further detail for enhancement principles and interventions is provided in the Green Infrastructure Study (SCRC SD/028), Ecological Assessment (SCRC SD 025).

Figure 12 supporting Policy SCRC/ST8 of the SCRC AAP identifies an alignment for proposed re-introduction of the Bradford Canal which will be protected to enable its future provision. The SCRC AAP identifies the sites which will be required to protect the proposed alignment. It is considered that this provides sufficient clarity and certainty of the route and sites which will need to protect an alignment under policy SCRC/ST8. This is also set out in relevant site allocation statements of the SCRC AAP. The City Centre AAP also identifies the relevant sites (CH/1.12 and CH/1.13) that will be required to protect an alignment of the canal in the site allocation statement.

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It is therefore not considered necessary for the proposed route of the Bradford Canal to be identified on the policies maps, however the council is willing to consider a modification of the plans to show the route if this is deemed critical to the soundness of the plans.

Overall it is considered that the policies in the AAPs relating to green infrastructure are fully justified by robust evidence, effective and deliverable. The AAP policy approach to green infrastructure has been supported by various consultees including the Environment Agency, Canal and Rivers Trust and Yorkshire Wildlife Trust.

### **47. How significant is the timely delivery of the green and blue infrastructure to the success of the plan and its conformity to the emerging CS?**

#### **Council Response**

The Core Strategy identifies the Canal Road Corridor and City Centre as opportunities to improve Green Infrastructure linked to key areas of change under Strategic Core Policy 6 (SC6). Policy SC6 sets out that plans will support and encourage the maintenance, enhancement and extension of networks of multi-functional spaces, routes and key areas of Green Infrastructure, as an integral part of the urban fabric and to improve urban and rural connectivity. The Core Strategy states that further work to define Green Infrastructure will be carried out through the preparation of the other Local Plan documents. Locations for development will be identified that offer opportunities to enhance Green Infrastructure and principles for design will be set out to deliver this.

In line with Core Strategy policy SC6 the council have produced Green Infrastructure Studies (BCC SD 023 and SCRC SD 028) for each AAP area to identify key opportunities and principles for green infrastructure enhancements. The SCRC also contains sections of key District-wide green infrastructure and habitat networks, including the Leeds and Liverpool Canal and River Aire. In addition high quality Green Infrastructure is a key component of the Urban Eco Settlement principles and will be vital in transforming the SCRC and City Centred attractive places to live, supporting biodiversity and mitigating impacts of climate change, including flood risk and urban heating as set out in NPPG paragraph 99.

It is therefore considered that improvements to green infrastructure in both AAPs is important in delivering the AAP and Core Strategy objectives in

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these areas and in ensuing both these areas are attractive, sustainable places to live work and visit.

Implementing Green Infrastructure enhancements will also form an important part of the place making measures across the City Centre and SCRC to further boost environmental quality and distinctiveness. The Viability and Delivery strategies (SCRC SD 032 and BCC DC 028) identified investment in off-site place making including green infrastructure to enhance the market attractiveness, values and delivery prospects of adjacent development schemes as an intervention to help to accelerate scheme delivery in the APA areas. This is likely to be particularly relevant to the City Centre, Shipley Town Centre and City Centre Fringe based sites where place-making is an integral component of wider regeneration. An example of this is the substantial investment which has already been made in this respect with the Mirror Pool at City Park.

The council is therefore committed to securing funding to implement green infrastructure enhancement in both AAP areas.

*Council*  
*Highways England*  
*Montagu Evans*  
*Canal and River Trust*  
*Iain Bath Planning*

### **Matter 7: CIL/S106 and other funding sources**

#### *Issue 1: Deliverability of infrastructure*

#### **48. Is there adequate clarity of how and when infrastructure referred to within the two AAPs will be funded and who will deliver it?**

##### **Council Response**

Both AAPs are supported by Infrastructure Delivery Plans (IDP) which assessed the infrastructure requirements related to the proposed growth in the AAP in consultation with key infrastructure providers in accordance with NPPF paragraph 162. The IDPs include an Infrastructure Delivery Programme (SCRC/SD027 and BCC AAP SD/022 Table 14.1) which sets out in detail the various infrastructure types and schemes and delivery mechanism and phasing where known.

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The IDPs are treated as 'live' documents and will be regularly updated to ensure the AAPs are supported by an evidence base which is robust and sound. This will ensure the policies AAPs are both justified and effective and also provide a level of flexibility to ensure that delivery of infrastructure is informed by the most up to date evidence if circumstances change, such as additional funding being secured. It is therefore considered that the IDPs provide adequate clarity of how and when infrastructure will be funded and delivered.

**49. How are the policies of both plans consistent with the CIL regulations, where reference is made to developments making financial contributions to infrastructure which is not directly related to the development and/or would include pooled contributions from more than five developments? For example, Policies M1, M2, M3, M5, M6 of the BCCAAP and Policies NBE1, NBE2, NBE3, ST1, ST5, ST6 of the SCRCAAP.**

### **Council Response**

The Council consider that the policies of both plans are consistent with the CIL regulations. The Council is preparing a CIL charging schedule which is currently at Examination stage. The CIL Draft Charging Schedule is accompanied by a Draft Regulation 123 List which sets out the matters which CIL may be spent on. This list includes the following items:

- Sustainable transport improvement schemes except where improvements are required as a direct result of development
- Green infrastructure and public greenspace (e.g. improvements to open space), except for on-site provision required by Core Strategy policies
- Habitat mitigation including Suitable Alternative Natural Greenspace, except for onsite provision required by Core Strategy policies

The Council is aware that S106 contributions cannot be sought for specific infrastructure items on the 123 list and any planning obligation must meet the tests in Regulation 122. S106 or S278 Agreements will still be able to be sought for site specific matters needed to make the development acceptable in planning terms.

The Community Infrastructure Levy and Section 106 Agreements are both important tools the Council will use to help bring forward the infrastructure necessary to support the development set out in the AAP. Both AAPs set out the approach to Developer Contributions and state that other than for affordable and site specific measures required to make a development

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acceptable, developer contributions will be collected through the CIL (SCRC AAP paragraph 5.9 BCC AAP 4.140). Therefore any pooled contributions would be funded through pooled CIL contributions from the date that the CIL is adopted. Prior to this any pooled contribution will need to meet the tests in Regulation 122.

As set out in the AAPs Core Strategy Policy ID3,- 'Developer Contributions' will be the primary mechanism for securing any developer contributions.

*Council*  
*Highways England*  
*Montagu Evans*  
*Canal and River Trust*  
*Iain Bath Planning*

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### **Matter 8: Minerals**

#### *Issue 1: Safeguarding of Minerals*

#### **50. Whether the approach to the safeguarding of minerals within the policies of the AAP is consistent with, and in conformity with emerging Policy EN12 of the CS, and the policies of the Framework? Is it appropriate for specific reference to be made to mineral resources within identified sites?**

#### **Council Response**

The Council consider that the approach to safeguarding minerals within the AAPs is consistent and in conformity with Core Strategy Policy EN12 and NPPF paragraph 143. NPPF Paragraph 143 promotes the prior extraction of mineral resources to avoid their unnecessary sterilisation by non-mineral development. To safeguard mineral resources across the District the Core Strategy defines Minerals Safeguarding Areas (appendix 13). The City Centre AAP and the majority of the SCRC AAP are covered by the Coal Minerals Safeguarded Area, with part of the northern end of the SCRC AAP falling within the Sandstone Minerals Safeguarding Area.

Representations by the Coal Authority on the AAP Publication Drafts indicate that the AAP areas contain coal resources which are capable of extraction by surface mining operations. The AAP policies (SCRC AAP SCRC/SE7 and BCC AAP BF3) therefore promote the prior extraction of the surface coal where feasible and ensure that any mineral resources are not unnecessarily sterilised by new development. Representations by the Coal Authority (018, Bust) indicate Policy SCRC/SE7 sets out an appropriate planning framework for mineral safeguarding as required by Policy EN12 of the Core Strategy.

Specific reference is made to minerals in the Bolton Woods Quarry (BWQ1) site allocation statement as the quarry is an active minerals extraction site producing both building stones and construction aggregates. It is therefore considered appropriate to refer to this specific resource to ensure the prior extraction of any remaining stone reserves as it has local importance.

The Council do not consider it necessary to refer to make specific reference to minerals resources within other identified sites as the consideration of any prior extraction is covered by policies SCRC/SE7 and BCC/BF3 and Core Strategy Policy ENV12.

#### *Shipley and Canal Road Corridor Action Area*

#### **51. How deliverable is the housing and associated development at the Bolton Woods Quarry site given that it is currently a working**



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### **quarry. Is the allocation consistent with emerging Policy ENV12 and paragraph 143 of the Framework?**

#### **Council response**

The site BWQ1 is an active sandstone quarry known as Bolton Woods Quarry, the northern part already having been restored and re-developed for housing. The site owners have indicated that the quarry is approaching the end of its operational life and is available for redevelopment within the plan period. The redevelopment of the quarry presents a key opportunity for delivering a significant level of new housing on brownfield land and environmental improvements in the heart of the Corridor. The Council considers that the allocation of the Bolton Woods Quarry site (BWQ1) for residential development is necessary in order for the plan to be effective and positively prepared and to meet the proposed housing target for the SCRC in the Core Strategy (Policy BD1/B) and in particular deliver significant residential development in the Centre Section of the Corridor.

On 23 September 2002 a modern set of planning conditions were determined for Bolton Woods Quarry under the provisions set out in Section 96 and Schedule 13 of the Environment Act 1995, in respect of planning permission 10100, granted on 25 July 1956, permission 29292, granted on 5 June 1967, and permission 78/05/05904, granted on 13 October 1978. The quarrying consent covers the restoration of Bolton Woods Quarry to a low level (with full restoration details reserved by condition 23).

The Council have established a collaborative working arrangement with the Bolton Woods Quarry owners and are confident the site is deliverable for housing and associated development. Through representations on the AAP Publication Draft the quarry owners have supported the allocation of the site for residential redevelopment (004, Bath) and indicated the phasing and timescales for delivery of the site is logical and supported by the site owners. In addition the representation (004, Bath) sought to clarify that while the quarry is large operational mineral extraction site the quarry is shortly to come to the end of its operational life.

An outline planning application (15/06249/MAO) for residential development of up to 700 dwellings (C3 use) has been submitted on the part of the site owned by the quarry owners (BWQ1) the majority of which is in active use for quarrying. This demonstrates the site owner's commitment to bringing forward residential re-development of the quarry. In support of the application the applicant has indicated that evidence

## **BRADFORD CITY CENTRE AREA ACTION PLAN AND SHIPLEY AND CANAL ROAD CORRIDOR AREA ACTION PLAN EXAMINATION**

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provided in a minerals operation statement demonstrates that the reserves within the quarry have now almost been fully exhausted and the quarry is reaching the end of its operational life. The consultee response given to the planning application by the Council's Minerals and Waste Team states that given the extent to which the quarry has now been worked and the constraints imposed by the quarry's urban location and adjacent high voltage electricity pylons it is accepted that the quarry does not have possess significant viable mineral reserves. Any proposals for the redevelopment of the site should provide for the prior extraction of any remaining viable stone reserves, in accordance with and emerging Core Strategy Policy ENV12.

NPPF paragraph 143 sets out that Local Plans should set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place. The Council do not consider that there are tension between housing delivery on this sites and policies for safeguarding of minerals in the Core Strategy and NPPF.

In line with NPPF paragraph 143 and Core Strategy Policy ENV12, the SCRC AAP sets out in the site allocation statement for BWQ1 that any proposals for the redevelopment of the site should provide for the prior extraction of any remaining high quality stone reserves, and demonstrate it would not be affected by any unacceptable land stability risks, in accordance with Core Strategy Policy ENV12. In addition the site allocation statement sets out those redevelopment proposals should consider any opportunities to utilise remaining mineral waste stockpiles as engineered fill and for any remaining stone reserves to be used to produce walling stone for use in the redevelopment of the site. It is therefore considered that the allocation is in line with the Core Strategy Policy ENV12 and NPPF paragraph 143.

*Council  
Iain Bath Planning*

### **Matter 9: Historic Environment.**

*Issue 1: Whether the two Plans provide a positive framework relating to the historic environment consistent with Paragraph 126 of the Framework? Whether the policies of the AAPs are consistent with the objectives of the Framework, and policy EN3 of the emerging CS?*

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### **52. Is there duplication between the policies of the emerging CS, the individual site allocations of both AAPs, and the Framework in relation to the Historic Environment?**

#### ***Council Response***

The Council are of the opinion the site specific design guidance relating to the Historic Environment within both AAPs is not duplication of policies within the emerging CS and the NPPF. The policies within the CS and the guidance set out in the Framework do establish the strategic approach taken forward in the AAP, however, the guidance set out in the proposal statements are specific to each site and the surrounding area and any local historical assets.

### **53. Are the levels of detail set out in individual site allocations relating to designated and non-designated heritage assets justified and based on evidence?**

#### ***Council Response***

The guidance set out in the site allocation proposal statements relating to designated and non-designated heritage assets is considered justified and based on evidence. The guidance set out in the statements is considered justified as it founded on a robust and credible evidence base in the form of the Council's Conservation Area Assessments, Appraisals and Management Plans, and the Saltaire World Heritage Site Management Plan. The statements have also been shaped by guidance from a constructive and positive dialogue with Historic England and the Council's Design and Conservation Officers during consultation on each stage of the plan production (detailed of which can be found in the Statements of Consultation).

### *ShIPLEY and Canal Road Corridor Action Area*

### **54. What makes Policy NBE5 of the SCRCAAP locally distinctive?**

#### ***Council Response***

Policy NBE5 is considered to be locally distinctive in that refers to the the boundaries of the Leeds & Liverpool Canal Conservation Area and Saltaire World Heritage Site Buffer Zone which are defined on the policies map inside the AAP boundary.

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The supporting text to the policy provides further detail in regards to referring to other key heritage assets with the AAP boundary which are identified within the sub area development frameworks and site allocation statements to give a clear indication that any development proposals will need to consider these other local heritage assets.

The supporting text to the policy also requires proposals to have regard to Saltaire World Heritage Site Management Plan in accordance with recommendations of the Heritage Impact Assessment (SCRC SD/023).

**55. Have opportunities been sought within the setting of Saltaire World Heritage Site to enhance or better reveal its significance consistent with Paragraph 137 of the Framework? How does proposed amendment (DPM0025), to the wording of Principle no. 7, impact on the soundness of the plan with reference to national and local policy?**

### **Council Response**

The Council has undertaken a heritage impact assessment (SCRC SD/023) to support the SCRC AAP to ensure the AAP identifies opportunities to enhance or better reveal the significance of the Saltaire World Heritage Site in accordance with NPPF paragraph 137. This assessment was undertaken in consultation with English Heritage and was also informed by the Saltaire World Heritage Site Management Plan (SCRC SD/023).

The AAP has identified enhancement opportunities in the sub area development frameworks and relevant site allocation statements, in line with recommendations of the Heritage Impact Assessment (SCRC SD/023 appendix 1).

The proposed modification DPM025 is made to ensure clarification of heritage policy requirements and to ensure the plan is fully consistent with NPPF paragraphs 132, 133 and 137 in response to representation by English Heritage (Smith, 003).

*Council  
Courthouse Planning; Iain Bath Planning*

### **Matter 10: Design and Natural Environment**

*Whether the policies of the AAPs are consistent with the objectives of the Framework, national guidance and policies EN6 and HO9 of the emerging CS?*

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**56. Are the policies<sup>10</sup> relating to carbon reduction and housing standards, including reference to Building for Life consistent with the policies of the emerging CS, the Framework and the NPPG? Following the March 2015 Ministerial statement on building standards is it appropriate to refer to additional local requirements relating to construction, layout or performance of new dwellings or other developments?**

### **Council Response**

NPPF paragraphs 93-95 set out that planning plays a key role in securing radical reductions in greenhouse gas emissions and that when setting a local requirement for a building's sustainability, planning authorities must do so in a way consistent with the Government's zero carbon building policy and adopt nationally described standards. In relation to this the latest NPPG states that local planning authorities need to take account of Government decisions on the Housing Standards Review.

Policies HO9 and EC4 of the Core Strategy set out requirements relating to sustainable design and construction for residential and non-residential schemes are applicable to development within the AAP area. Following the Main Modifications to Core Strategy Policy HO9 (MM100) the requirements for housing standards including Code for Sustainable Homes/Zero Carbon Housing, internal space standards have been removed in accordance with National Planning policy.

NPPF paragraph 95 sets out that to support the move to a low carbon future, local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions. The policies in the AAPs therefore seek to encourage and support major developments to achieve the highest possible standards of sustainable design and construction, which exceed minimum requirements as set out in national planning policy and the Core Strategy, where possible. This is considered important to support Urban Eco Settlement principles and the Bradford Climate Change Framework for Action target to cut District carbon emissions by 40% by 2020. However, the plans do not set out any local requirement or sustainable housing standard in accordance with national policy (NPPF paragraph 95). In addition the Council consider that AAPs should support the use of on-site low carbon or renewable energy generation (where appropriate and feasible) to help meet the energy requirements of new housing development and reduce carbon emissions.

In regards to Building for Life, NPPF paragraphs 56-58 state good design is a key aspect of sustainable development and that Local Plans should develop robust and comprehensive policies that set out the quality of

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<sup>10</sup> Policy CC2 of SCRCAAP and BLF3 of the BCCAAP

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development that will be expected for the area. The latest NPPG reaffirms the importance of good design and that good design is an integral part of sustainable development. The NPPG states that local planning authorities should secure design quality through the policies adopted in their local plans (Paragraph: 003 Reference ID: 26-003-20140306).

Building for Life 12 (BFL12) is the industry standard for the design of new housing development and is based on the NPPF in relation to achieving good design. BFL12 is designed to be used at all stages of the development process and to guide design related discussions with the local community, local authority and other stakeholders. The Council therefore considers that BFL12 is a key tool which should be used to support the design quality of major housing applications. The Housing Standards Review did not consider standards for assessing the overall design quality of housing developments and the NPPG on the new optional technical housing standards does not refer to achieving good quality design. The Council therefore considers the reference to Building for Life as the basis for considering the overall design quality of a scheme, is fully justified and consistent with the latest national planning policy and the Government's approach for achieving good design as set out in NPPF and NPPG.

The supporting text to Core Strategy Policy HO9 sets out that the design quality of schemes over 10 units will be determined through a Building for Life 12 Assessment. The SCRC AAP does not set a specific standard in relation to Building for Life. However, in line with Core Strategy Policy HO9 the SCRC sets out residential schemes should perform well against Building for Life standard. In addition the Council will support and encourage proposals seeking to achieve 'Built for Life' approval. This is considered important given the areas status as an Urban Eco Settlement and to meet the objective of creating exemplar sustainable urban neighbourhoods. Therefore the Council will seek to promote high quality design and support and encourage proposals seeking to achieve 'Built for Life' where possible.

### **57. How does the proposed modification to Policy NBE6 which includes reference to the natural environment impact on the soundness of the Plan with reference to national and local policy?**

#### ***Council Response***

A key objective of the AAP is to deliver transformation regeneration of the area including enhancements to green infrastructure and biodiversity. The proposed modification is made to provide further clarification of policy requirements in relation to achieving high quality design, and to ensure the plan is fully consistent with NPPF paragraphs 61, 114 and 117 in relation to integration of new development into the natural, as well as built environment and creating, protecting and enhancing networks of biodiversity and green infrastructure.

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*Council*

### **Matter 11- Other Matters**

**58. Any other matters arising from the hearings.**

### **Matter 12: Implementation, Delivery and Monitoring**

**59. Do both AAPs have clear and effective mechanisms for implementation, delivery and monitoring?**

#### ***Council Response***

Both Area Action Plans are supported by comprehensive mechanisms for effective implementation, delivery and monitoring of the Plan's.

The AAPs each contain a chapter on Implementation and Delivery, which detail the approach taken to addressing strategic infrastructure required to support growth and key viability and delivery issues. The chapters cover key themes important to implanting and delivering the Plans, including Viability, Infrastructure, Developer Contributions and Working in Partnership.

The Implementation and Delivery chapters also contain estimated delivery of sites allocated within the Plans.

A key element of the Chapter is the Monitoring Framework which will measure the success of the Objectives and Policies within the AAP and help to identify any potential need for a review of all or part of the AAP, the relevant Core Strategy Performance Monitoring Framework indicators set out in the Framework. A review of the Plan is likely to be triggered where monitoring shows that key elements of the Plan would not be met to a significant extent.

Monitoring of the AAP will be reported within the Council's Annual Monitoring Report.

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**Individual Sites**

***Please address, where appropriate, within your response to the above main matters.***

<i>Bradford City Centre Area Action Plan</i>	
CH/1.2	<p><b>How are the proposed amendments to DPM006 and DPM007 necessary to ensure that the Plan is sound?</b></p> <p><b><i>Council Response</i></b></p> <p>The proposed modifications DPM006 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by West Yorkshire Archaeology Advisory Service.</p> <p>The proposed modifications DPM007 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 58 of the NPPF, ensuring optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments). This is in response to representation by Montagu Evans on behalf of British Land.</p>
CH/1.3	<p><b>How is the proposed amendment DPM008 necessary to ensure that the Plan is sound? Should reference be made to the sloping nature of the site?</b></p> <p><b><i>Council Response</i></b></p> <p>The proposed modifications DPM008 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by West Yorkshire Archaeology Advisory Service.</p>
CH/1.9, 1.10. 1.12 and 1.13	<p><b>Are the proposed amendments (DPM009, DPM015, and DMP017) necessary to ensure that the Plans are sound?</b></p>



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	<p>The proposed modifications DPM009, DPM015, and DMP017 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by West Yorkshire Archaeology Advisory Service and Historic England.</p> <p><b>Should reference be made to potential archaeological remains and the need to record them?</b></p> <p><b><i>Council Response</i></b></p> <p>Yes.</p>
CH/1.4- CH/1.10	<p><b>How are the proposed amendments (DPM009- DPM015, and DMP019) necessary to ensure that the Plans are sound?</b></p> <p><b><i>Council Response</i></b></p> <p>The proposed modifications DPM009, DPM015, and DMP019 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by West Yorkshire Archaeology Advisory Service and Historic England.</p>
CH/1.12	<p><b>How would the setting of the listed building be compatible with the proposed multi decked car parking?</b></p> <p><b><i>Council Response</i></b></p> <p>Any impact upon listed buildings shall be fully examined at the application stage using the policies set out in the City Centre AAP, Core Strategy and the NPPF.</p>
M/1.1	<p><b>How are proposed amendments DPM019 necessary to ensure that the Plans are sound?</b></p> <p><b><i>Council Response</i></b></p> <p>The proposed modifications DMP019 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by Historic England.</p>

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	<p>Should reference be made to potential archaeological remains and the need to record them?</p> <p><b>Council Response</b></p> <p>Yes</p>
M/1.4	<p><b>How should the proposed redevelopment of the site include reference to the need to militate against a “wind tunnel” effect?</b></p> <p><b>Council Response</b></p> <p>Any planning permission for a new building the site would be assessed against Policy BF2 of the City Centre AAP.</p> <p>In relation any impact the existing building has in regards to “wind tunnel” effect and the redevelopment of the building, the Council will work closely with the applicant to ensure this is minimised. However, it must be stressed any such existing impacts, should they exist, are already in existence and there would be limits to which the AAP could address this.</p>
M/1.4 and 1.5	<p><b>How are proposed amendments (DPM002 and DPM0022) necessary to ensure that the Plans are sound? Should reference be made to potential archaeological remains and the need to record them?</b></p> <p><b>Council Response</b></p> <p>The proposed modifications DMP002 was necessary to correct an error in the plan.</p> <p>The proposed modifications DMP022 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by Historic England.</p>
V/1.7- V/1.8 and V/1.10	<p><b>How are proposed amendments (DPMP024, DPM024 and DPM027) necessary to ensure that the Plans are sound?</b></p> <p>The proposed modifications DMP024 and DPM027 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by Historic England.</p>

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V/1.9	<p><b>How is proposed amendment DPM0026 necessary to ensure that the Plan is sound?</b></p> <p><b><i>Council Response</i></b></p> <p>The proposed modifications DPM026 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by West Yorkshire Archaeology Advisory Service.</p>
B/1.2	<p><b>How is proposed amendment DPM005 necessary to ensure that the Plan is sound?</b></p> <p><b><i>Council Response</i></b></p> <p>The proposed modifications DPM005 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by West Yorkshire Archaeology Advisory Service.</p>
B/1.6	<p><b>How is the proposed mix of development compatible with the use of the former Odeon for cultural uses, and consistent with the objectives of Policy SL3?</b></p> <p><b><i>Council Response</i></b></p> <p>The Council consider the re-use of the former Odeon for leisure and cultural uses is compatible with the building. The office element of the development would likely be supplementary to the cultural component of any proposed scheme. The Council also considers the redevelopment of the site consistent with the objectives of Policy SL3 as there are no apparent issues with improving connections between shopping areas as part of any proposed scheme.</p>
<i>ShIPLEY and Canal Road Corridor Area Action Plan</i>	
BWQ1	<p><b>Whether there are any tensions between the delivery of housing within the plan period and policies for the safeguarding of minerals in the emerging CS and the Framework?</b></p>

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	<p>Council response</p> <p>The southern part of the site BWQ is an active minerals extraction site the northern part already having been restored and re-developed for housing. The site owners have indicated that the quarry is approaching the end of its life and is available for redevelopment within the plan period. The redevelopment of the quarry presents a key opportunity for delivering a significant level of new housing on brownfield land and environmental improvements in the heart of the Corridor.</p> <p>The council do not consider that there are tension between housing delivery on this sites and policies for safeguarding of minerals in the Core Strategy and NPPF. As set out in the site allocation statement any proposals for the redevelopment of the site should provide for the prior extraction of any remaining high quality stone reserves, and demonstrate it would not be affected by any unacceptable land stability risks, in accordance with Core Strategy Policy ENV12</p> <p>In addition the site allocation statement sets out those redevelopment proposals should consider any opportunities to utilise remaining mineral waste stockpiles as engineered fill and for any remaining stone reserves to be used to produce walling stone for use in the redevelopment of the site.</p> <p>It is therefore considered the allocation is in line with the Core Strategy Policy ENV12 and NPPF paragraph 143.</p>
NBW1	<p><b>How do the proposed modifications (DPM0017 and DPM0018) tabled by the Council impact on the soundness of the plan?</b></p> <p>Council Response</p> <p>The proposed modifications will ensure then plan is consistent with national policy. The proposed modifications (DPM0017 and DPM0018) will clarify the proposed use in regards to the need for new and improved sports facilities and will ensure that the AAP is fully consistent with paragraph 73 and 74 of the NPPF in response to representation by Sports England (Ledger, 007).</p>
DF1	<p><b>How is the proposed development to be accessed by car?</b></p>

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	<p><b>Will there be any adverse impacts relating to noise?</b></p> <p>Council response</p> <p>As set out in the AAP site allocation statement (DF1), access to the site by car will be acceptable either via Dock Lane which leads from Leeds Road or via the swing bridge off Dockfield Road, which connects to the signalised junction at Otley Road.</p> <p>The site has extant outline planning approval (13/04594/OUT) for a mixed use development including business (B1) and residential (C3) uses. It is not considered there will be adverse impacts relating to noise. The consideration of site specific details associated with development such as mitigating any impacts relating to noise will be undertaken during the detailed planning application stage and mitigated through planning conditions where necessary.</p>
DF3	<p><b>Whether residential uses are compatible with a scrap merchant and whether the scrap merchant plays a role in the Council’s Waste Strategy?</b></p> <p>Council Response</p> <p>The scrap yard is located adjacent to the part of the site currently in business/industrial use. The scrap yard is brownfield land in a sustainable location and is considered appropriate to include in the overall boundary of the site (DF3). The site benefits from being located in very close proximity to Shipley Railway Station and local services within the Town Centre.</p> <p>The area is urban and mixed use in nature, including general industrial uses, a railway line, vacant land to the south and business and residential uses located directly to the east of the site. The site lies in an area designated under the RUDP 2005 as mixed use area (S/UR7.1), with the use classes identified as acceptable in the area: B1 Business B2 General Industry and C3 Residential. Therefore, where appropriate residential uses may be located within proximity to business/industrial uses.</p> <p>In addition, with the redevelopment of the Shipley East site (SE1) directly to the south of site DF3, the area is expected to undergo transformation which will make it a more attractive residential area in the future. The comprehensive redevelopment</p>

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	<p>of the site DF3 including the scrap yard (subject to landowner agreement) would facilitate removal of a potentially un-neighbourly use, as the area becomes more residential. The regeneration of the site also presents the opportunity to provide a more attractive frontage onto Leeds Road and Shipley East and enhance the setting of the Leeds and Liverpool Canal and Saltaire World Heritage Site.</p> <p>The remaining part of the site DF3 is being promoted for residential redevelopment by the landowner/developer for residential development with submission of outline permission for 60 new build apartments in 2016. The site is currently in the development management process. Representations on the AAP Publication Draft (001, Askham) by the landowner/developer have indicated that their proposal does not include the scrap yard, although the benefits of including that part of the site in a comprehensive development are recognised. The delivery of residential development on part of the site adjacent to the scrap yard is not considered dependent on the scrap yard relocating; however the relocation of the scrap yard to deliver more compatible uses is supported by the Council.</p> <p>It is considered that any site specific matters associated with development relating to any neighbour uses which may conflict with each other will be undertaken during the detailed planning application stage and could be effectively mitigated through planning conditions where necessary.</p> <p>Overall, it is considered that the allocation of the scrap yard within the site boundary is sound and will enable this brownfield site to be developed for residential led mixed use development as part of a comprehensive scheme, which will also enhance the setting of the Saltaire World Heritage Site.</p> <p>As an existing scrap yard the site forms part of the council's waste local plan strategy. However given its relatively small size and nature of operations it is not considered that the site plays an important part in regards to the Council's Waste local plan Strategy. Work undertaken on the Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study (a key evidence base for the Waste Management DPD) has indicated there is currently a significant oversupply of waste</p>
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	<p>metal recycling within the Bradford, and thus much the waste managed at sites within the District is currently imported from neighbouring authorities. Although these facilities are important to achieving Bradford’s Waste Hierarchy, the Waste Management DPD does make allowances for the redevelopment of these sites for other purposes other than waste management. Policy WDM3 establishes a criteria based approach for the redevelopment of existing waste sites within the District. Should an applicant satisfy the criteria of the policy (in combination with complying with other policies within the Waste Management DPD and Core Strategy) through the submission of adequate evidence in support of a planning application, the Council would be supportive of the redevelopment of scrap yard site put forward in the AAP.</p> <p>In addition the AAP site allocation states the council will support the relocation of the scrap yard to enable comprehensive redevelopment of the site subject to land owner agreement. This would enable any waste management capacity the site offers to remain in the District subject to an alternative, suitable waste facility site being identified elsewhere in the District that is capable of satisfying the site location criteria for the waste management facility.</p> <p>Therefore, it is considered that the site can be redeveloped for non-waste related uses without prejudice to the waste management strategy of the development plan.</p>
<p>DF1, DF3, STC6 and BWQ1</p>	<p><b>How do the proposed site specific modifications (DPM008, DPM010, DPM020, and DPM013) relating to heritage issues tabled by the Council impact on the soundness of the Plan?</b></p> <p><b>Council Response</b></p> <p>The proposed modifications will ensure then plan is consistent with national policy and fully justified.</p> <p>The proposed modification DPM008 will help ensure the AAP will safeguard and enhance the setting of the World Heritage Site, in line with the recommendations from the Heritage Assessment (SCRC SD023) and ensure the plan is fully consistent with NPPF paragraphs 132 and 137 in response to representation by</p>

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	<p>English Heritage (Smith, 003).</p> <p>The proposed modifications DPM0013 and DPM0010 will clarify the site’s heritage constraints and will ensure that the AAP is fully consistent with paragraph 137 and 141 of the NPPF in response to representation by West Yorkshire Archaeology Advisory Service (Sanderson, 015)</p> <p>The proposed modification DPM020 will clarify the site’s heritage constraints and help to ensure future development avoids harm and takes opportunities within the setting of heritage assets to enhance or better reveal their significance and ensure the plan is fully consistent with NPPF paragraphs 133 and 137 in response to representation by English Heritage (Smith, 003).</p>
HSC2	<p><b>How does the proposed alteration to the Policies Map (DPM0027) impact on the soundness of the Plan?</b></p> <p><b>Council response</b></p> <p>The proposed modifications will ensure then plan is consistent with national policy and fully justified.</p> <p>The proposed modification is made to correct the boundary of land designated as playing fields under Policy SCRC/HSC2, in response to representation by Sport England (Ledger, 007). This change will ensure the plan is fully justified, effective and ensure the plan is consistent with NPPF paragraph 74.</p>
STC1, STC2, STC4, STC6 and DF2 and DF3	<p><b>How do the proposed modifications (DPM003-DPM007, DPM009 and DPM0012) clarifying the proposed use of sites tabled by the Council impact on the soundness of the Plan?</b></p> <p><b>Council Response</b></p> <p>The proposed modifications will ensure then plan is effective and consistent with national policy.</p> <p>The proposed modifications are made to provide clarification of the proposed use of the site to ensure the plan is effective and consistent with NPPF paragraph 157.</p>
SE1, NBW7	<p><b>How do the proposed modifications DPM0016 and DPM0019 tabled by the Council relating to the potential</b></p>



**BRADFORD CITY CENTRE AREA ACTION PLAN AND SHIPLEY AND CANAL  
ROAD CORRIDOR AREA ACTION PLAN EXAMINATION**

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	<p><b>presence of unstable land impact on the soundness of the plan?</b></p> <p><b>Council Response</b></p> <p>The proposed modifications will ensure then plan is consistent with national policy and fully justified.</p> <p>The proposed modifications are made to provide clarification of the site specific constraints in relation to land instability to ensure the plan is justified and consistent with NPPF paragraph 120 and 121, in response to representation by the Coal Authority (018, Bust).</p>
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