

Shipleigh and Canal Road Corridor Area Action Plan: Publication Draft

Statement of Consultation

**Public Consultation
December 2015 – February 2016**

FORWARD

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

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

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

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1.0 INTRODUCTION & BACKGROUND

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

Purpose of this document

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

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

ShIPLEY and Canal Road Corridor Area Action Plan

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

2.0 METHODS OF CONSULTATION & EVENTS PROGRAMME

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

2.1 Consultation and Supporting Documents

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

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

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

- at Planning Offices in Bradford (Jacobs Well)
- Ilkley Town Hall

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

Evidence Base & Supporting Documents

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

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

2.2 Who was consulted?

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

Consultees List	Number of consultees
Statutory consultees	100
Previous respondents to Shipley and Canal Road Corridor AAP consultation	46
Other consultees	39
Councillors	90
LDF Notification List	1564
Total	1839

2.3 How the public and other stakeholders were consulted

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

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

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

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

2.3.4 The Council issued a press release in December 2015 following Council Executive approval for public consultation. A copy of this can found in Appendix 2. Local news press / media provided coverage on the Publication Draft consultation. In particular, the Telegraph and Argus ran an article to highlight the draft plan and how to get involved for the local communities. The news article published can be found in Appendix 2. The following newspaper article was published by the Telegraph and Argus on Tuesday 13th October 2015:
http://www.thetelegraphandargus.co.uk/news/13844667.Regeneration_plans_for_Bradford_city_centre_Shingley_and_the_Canal_Road_approved/

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

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

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

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

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

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

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

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

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

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

3. SHEDULE OF CONSULTATION RESPONSES

3.1 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

Ref	Name	Organisation
SCRC/PD/0001	Mr Askham	The Courthouse Planning Consultancy on behalf of Mr J Jameson
SCRC/PD/0002	Mr Watson	Local resident
SCRC/PD/0003	Mr Smith	Historic England
SCRC/PD/0004	T. Rios	Highways England
SCRC/PD/0005	Mr Hall	Natural England
SCRC/PD/0006	Ms Garside	Yorkshire Wildlife Trust
SCRC/PD/0007	Ms Ledger	Sport England
SCRC/PD/0008	Ms Fowler	Local Resident
SCRC/PD/0009	T. Higginson (Client) A. Rivero (Agent)	Network Rail
SCRC/PD/0010	Mr Coy	Canal & River Trust
SCRC/PD/0011	Ms Stead	Bradford Urban Wildlife Group
SCRC/PD/0012	Ms Knamiller	Local Resident
SCRC/PD/0013	Mr Robison	Local Resident
SCRC/PD/0014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group
SCRC/PD/0015	Mr Sanderson	West Yorkshire Archaeology Advisory Service (WYAAS)
SCRC/PD/0016	Ms Howson	Bradford Co Housing
SCRC/PD/0017	Ms Lambert	Environment Agency
SCRC/PD/0018	Miss Bust	The Coal Authority

3.1.2 SCHEDULE OF WRITTEN REPRESENTATIONS

Rep Id	Name	Organisation	Comment (Summarised by the City of Bradford MDC)	Council's Response	Action
Vision					
003	Mr Smith	English Heritage	Support the proposed Vision for the Shipley and Canal Road Corridor	Comment of support noted.	No action required
017	Ms Lambert	Environment Agency	Support the Vision which is clear and provides aspirations for significant improvements to the area with a strong focus on improving the natural environment to achieve enhanced biodiversity and ecology within the AAP.	Support noted	No action required
Strategic objectives					
003	Mr Smith	English Heritage	Support Strategic Objective 6. This area lies at one of the key gateways to the World Heritage Site. At present, it does not provide a good arrival point for visitors into one of Bradford's main tourist areas nor does it present a very favourable image of this part of the District.	Support for Objective 6 noted.	No action required
003	Mr Smith	English Heritage	Strategic Objective 11, Subject to the amendment set out below, we support this Objective. There are a number of designated heritage assets within the area covered by this Area Action Plan consequently, it is important that the strategy for this area ensures that these assets are appropriately conserved. Strategic Objective 11, line 4 The 1990 Act and the NPPF make it clear that any harm to a designated heritage asset should be avoided. Therefore, this Objective needs a slight amendment to more closely reflect national policy guidance. Amend to read:- "... avoid harm to and take account of..."	Support for Objective 11 noted. The Council considers that Objective 11 as drafted is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change would make the Objective more closely align with national policy.	No action taken prior to submission
006	Lauren Garside	Yorkshire Wildlife Trust	Yorkshire Wildlife Trust welcomes and supports strategic objective number 7, which aims to protect and enhance biodiversity and green infrastructure. Such is in accordance with Paragraph 118 of the NPPF.	Support for Objective 7 noted.	No action required
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	The following points are noted and supported <ul style="list-style-type: none"> - to promote the efficient use of land – at least 55% of new housing on previously developed land. - Deliver a range of well-designed quality buildings 	Support noted.	No action required
016	Ms Howson	Bradford Co Housing	Bradford Co-housing Group - Our ambition to build a cohousing community would help towards the development of an Urban Eco Settlement and the strategic themes of the AAP, in particular: <ol style="list-style-type: none"> 1) To deliver a wide choice of quality homes 3) To maximise sustainable transport options 4) To mitigate and adapt to climate change and also 6) to promote healthy, strong and inclusive communities 	Comment noted.	No action required
Context					
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	The following points are noted and supported – <ul style="list-style-type: none"> - There is a need for a comprehensive and up to date planning framework for the AAP area - There is a need for a clear vision, strategy and framework 	Comment of support noted.	No action required

014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	<p>1. The following points are noted and supported –</p> <ul style="list-style-type: none"> - The corridor area represents a strategic location for new development - Development within the area will make significant contribution to the regeneration of the district - More housing is needed within the corridor area - The corridor area is within the main urban area of Bradford - Canal Road is a major strategic route - One of the major features of the corridor area is Bolton Wood Quarry - Para 2.26 – the corridor is identified as part of the community strategy strategic aim to increase the quality, quantity and affordability of sustainable housing across the district and the AAP supports this <p>2. My clients would like to clarify the following reference - “Bolton Woods Quarry” – a large operational mineral extraction site – this should have additional text attached making reference to the fact that the quarry is shortly to come to the end of its operational life”</p>	<p>1. Comment of support noted.</p> <p>2. Comment noted. The Council considers that the AAP as drafted is sound and the proposed change is not in itself required to make the plan sound. The proposed change is considered unnecessary as this is already included in the Minerals and Waste section para 4.4.45 of the AAP.</p>	<p>1. No action required</p> <p>2. No action taken prior to submission</p>
Shipley sub area Development framework					
003	Mr Smith	English Heritage	<p>Shipley Vision - Sound Subject to the amendment set out below, we support the Vision for Shipley</p> <p>1. Shipley vision unsound. Given that one of the intentions of the overarching Vision of the AAP is to improve one of the gateways into Saltaire, the Vision for Shipley ought to make reference to the World Heritage Site. First paragraph add the following to the end:- <i>“It will provide an attractive gateway for those visiting the World Heritage Site”</i></p>	<p>1. The Council considers that the Vision as drafted is sound and the proposed change is not in itself required to make the plan sound. However, agree the proposed change would make the sub area vision more closely align with overall AAP Vision.</p>	<p>No action taken prior to submission</p>
003	Mr Smith	English Heritage	<p>Shipley Vision supporting text Unsound. This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not. The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for Shipley. Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p> <p>Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account. This Policy should be based upon the supporting text for the Vision set out on pages 23 and 24.</p>	<p>This section, provides a framework for the sub area that builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council consider that the Shipley sub area development framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council do not consider that this section requires an additional policy as, in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p>	<p>No action taken prior to submission</p>
Shipley Proposed site allocations					

003	Mr Smith	English Heritage	ShIPLEY Allocations Unsound. The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy. In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan. Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i>	NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate It is considered that the proposed AAP site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs. The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed ShIPLEY site allocations as drafted are sound and the proposed change is not required to make the plan sound.	No action taken prior to submission
Site STC1 ShIPLEY Indoor Market Hall					
003	Mr Smith	English Heritage	Sound. This site lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore welcome the Site Proposals which reflect the recommendations of the Heritage Assessment	Comment noted.	No action required
STC2: Market Square					
003	Mr Smith	English Heritage	Sound. Manor Lane Wesleyan Reformed Church including number 21 Manor Lane (to the west of this site) is a Grade II Listed Building. This site also lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore, we welcome the Site Proposals which reflect this.	Comment noted.	No action required
STC3 Station road					
009	T. Higginson (Client) A. Rivero (Agent)	Network Rail	STC3 - Support for the allocation particularly in terms of the reference to the need to upgrade Station Road to adoptable status	Comment of support noted.	No action required
STC6:Buildings along Briggate					
003	Mr Smith	English Heritage	Sound. This site adjoins the boundary of the Leeds Liverpool Canal Conservation Area. This site also lies within the Buffer Zone of the World Heritage Site at Saltaire. Subject to the change set out below, welcome the Site Proposals. This reflects one of the recommendations of the Heritage Assessment. Unsound. The Heritage Assessment also recommended that the site allocation statement should include a requirement that <i>“development would be expected to provide high quality architectural design to safeguard and enhance the setting of the World Heritage Site”</i> This should also be included in the Site Proposals. Add the following additional bullet point:- <i>“provide high quality architectural design to safeguard and enhance the setting of the World Heritage</i>	The Council considers that the proposed ShIPLEY site allocation is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change would reflect the detailed recommendations of the Heritage Assessment in regards to this site and provide further clarity in regards to on site heritage issues.	No action taken prior to submission

			Site		
DF1: Dock Lane					
003	Mr Smith	English Heritage	Sound. This site adjoins the boundary of the Leeds Liverpool Canal Conservation Area. This site also lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore welcome the Site Proposals that reflect the recommendations of the Heritage Assessment.	Comment noted.	No action required
DF2: Junction Bridge, Briggate					
003	Mr Smith	English Heritage	Sound. Virtually all this area falls within the Leeds Liverpool Canal Conservation Area. The canal bridge Number 208, 200 metres west of the junction with Dock Lane, is a Grade II Listed Building. This site also lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore, welcome the Site Proposals that reflect the recommendations of the Heritage Assessment.	Comment noted.	No action required
015	Mr Sanderson	West Yorkshire Archaeology Advisory Service (WYAAS)	Site DF2 will need evaluation with regard to the potential presence of archaeological features associated with the operation of the 18 th / early19th century Bradford Canal. We hope that these recommendations will be noted to & will appear in the revised drafts to be submitted for examination.	Comment noted. SCRC/Policy NBE5 Criteria A sets out that development will be expected to preserve and enhance the character, appearance and setting of key heritage assets within and adjacent to the Corridor, in accordance with Core Strategy Policy EN3: Historic Environment. Core Strategy Policy EN3 states that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. The Council therefore considers that the proposed site allocation statement is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may enhance the site allocation statement and provide further clarity to developers in regards to on site heritage issues.	No action taken prior to submission
017	Ms Lambert	Environment Agency	The site summary identifies that this site lies partially in flood zones 2 and 3a. No discussion is given on the impact of this on potential developments and possible mitigation measures that will be required. In order to meet aspirations to enhance green infrastructure on the site, and comply with the requirements of the NPPF Sequential Test, no built development should take place in those parts of the site which fall within the flood zone.	The SFRA Level 2 states that only 7.7% of the site is within Flood Zone 3a, which should be left free from the residential part of the development. The site allocation identifies flood risk zones 2-3a to south west of site and states redevelopment will be expected to enhance green infrastructure and ecological assets along the Bradford Beck and Leeds and Liverpool Canal. Policy SCRC/CC1 requires sites located in areas at risk of flooding include flood risk mitigation measures to ensure that the development is made safe for its lifetime, in line with site specific recommendations in the SFRA Level 2.	No action taken prior to submission

				The Council therefore considers that the proposed site allocation statement is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may strengthen the site allocation statement and provide further clarity in regards to on site flood risk issues and help ensure flood risk mitigation is fully considered in any proposed scheme.	
DF3 Land between Leeds Road and Dock Lane					
0001	Mr Askham	The Courthouse Planning Consultancy on behalf of Mr Jameson	<p>1. The text relating to the retention of the old Windhill Station -should be deleted. The building is not listed or within the setting of a listed building and there is no justification for the retention of this building. It is in very poor condition and does not exhibit any unique features to make it worthy of retention. If there were it would be listed. Its last viable use was many years ago and its use for low key uses has led in some ways to its poor condition. It needs to be demolished and it needs to be removed to make way for the proposed residential use, which is the prime use identified in the Draft Plan (DF3), which will significantly contribute to the regeneration and uplift of this immediate area and the buffer zone of the world heritage site. This proposal should not be hamstrung by the retention of this old and very tired building, which has no significance. Retention of this old building will not provide the new strong more attractive frontage to Leeds Road to create an enhanced gateway to Shipley and the World Heritage Site of Saltaire, whilst the proposed housing development of new and sustainable apartments certainly will. Part of making the Plan sound is to ensure that each detail is effective and deliverable. Currently the proposal DF3 is likely to be ineffective and counterproductive. This is not in compliance with National or local policy and initiatives and therefore needs amending. The consultation and engagement with the public is very important - the need to get detailed proposals "right" is prevalent, so as to ensure the ambitions for the Plan are deliverable. Soundness is important but only if the Plan is deliverable and valid.</p> <p>2. Our interest and proposal does not include the scrap yard, although we recognise the benefits of including that part of the site in a comprehensive development</p>	<p>1. The Council recognise the importance of ensuring the proposals in the AAP are deliverable. However, the Council must also consider the importance of protecting and enhancing heritage assets within the AAP in line with national policy. In accordance with NPPF paragraph 126 the AAP sets out a positive strategy for the conservation of heritage assets and seeks to conserve them in a manner appropriate to their significance.</p> <p>AAP Policy SCRC/NBE5 sets out that key heritage assets include key unlisted buildings and structures within Conservation Areas. The AAP identifies key heritage assets in the sub area development frameworks and site allocation statements. The old Shipley and Windhill Station is identified as a key heritage asset within the Shipley sub area in paragraph 3.36 of the AAP Publication Draft.</p> <p>The old Shipley and Windhill station is located within the Leeds and Liverpool Canal Conservation Area boundary and the World Heritage Site buffer zone. The building is not currently listed; however it is identified in the Leeds and Liverpool Canal Conservation Area Assessment.</p> <p>Based on the above the Council considers the text referring to the retention of the old Windmill Station in site DF3 is sound and the council therefore disagree the text should be deleted.</p> <p>2. Comment noted.</p>	<p>1. No action taken prior to submission</p> <p>2. No action required</p>

0010	Mr Coy	Canal & River Trust	<p>DF3 - We welcome and support that site DF3 'Land between Leeds Road and Dock Lane' specifies that the line of the Bradford Canal is to be protected to accommodate future aspirations to reinstate the Bradford Canal, in accordance with Policy SCRC/ST8 'Bradford Canal'.</p> <p>In our previous responses to the Council on the AAP, we highlighted the Bradford Canal as an important component of Green Infrastructure and stated that protecting the line of the canal will help to ensure that a future restoration is feasible.</p> <p>Such an approach is consistent with paragraph 114 of the National Planning Policy Framework (NPPF), which calls for local planning authorities to plan 'positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It would also help to conserve an important heritage asset as paragraph 126 of the NPPF calls for local planning authorities to set out in their local plans 'a positive strategy for the conservation and enjoyment of the historic environment' and 'recognise that heritage assets are an irreplaceable resource.'</p> <p>Therefore, this aspect of the plan is Sound as it is consistent with National Policy</p>	Comment of support noted.	No action required
003	Mr Smith	English Heritage	<p>Sound. This site adjoins the boundary of the Leeds Liverpool Canal Conservation Area. It also lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore, welcome the site proposals that reflect the recommendations of the Heritage Assessment.</p>	Comment noted.	No action required
015	Mr Sanderson	West Yorkshire Archaeology Advisory Service (WYAAS)	<p>Site DF3 will need evaluation with regard to the potential presence of archaeological features associated with the operation of the 18th/ early19th century Bradford Canal.</p>	<p>Comment noted. SCRC/Policy NBE5 Criteria A sets out that development will be expected to preserve and enhance the character, appearance and setting of key heritage assets within and adjacent to the Corridor, in accordance with Core Strategy Policy EN3: Historic Environment.</p> <p>Core Strategy Policy EN3 states where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>The Council therefore considers that the proposed site allocation statement is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may strengthen the site allocation statement and provide further clarity to developers in regards to on site heritage issues.</p>	No action taken prior to submission
DF4/DF5: Dockfield Road South					
003	Mr Smith	English Heritage	<p>Sound. This site adjoins the boundary of the Leeds Liverpool Canal Conservation Area. It also lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore, welcome the site proposals that reflect the recommendations of the Heritage Assessment.</p>	Comment noted.	No action required

017	Ms Lambert	Environment Agency	Parts of DF4 are identified as being within flood zone 3b (functional floodplain). Table 3 of NPPG makes it clear that development is not appropriate in zone 3b (with the exception of essential infrastructure, subject to passing the Exception Test, and water compatible uses). This should be made much clearer in the AAP. The Environment Agency will object in principle to any development proposals for less, more or highly vulnerable uses in flood zone 3b.	<p>The AAP has been informed by an SFRA Level 2, which recommends that sites DF4 and DF5 should be combined with more vulnerable uses directed towards DF5 and a sequential approach taken to site layout. This is reflected in the AAP and site allocation statement.</p> <p>As set out in the site allocation statement development will be expected to:</p> <ul style="list-style-type: none"> - be supported by a site specific flood risk assessment. - result in no net loss of the functional floodplain (zone 3b) and not increase flood risk elsewhere - safeguard land in the functional floodplain for green infrastructure and flood risk management <p>Under AAP Policy SCRC/CC1 sites located in areas at risk of flooding will be expected to include flood risk mitigation measures to ensure that the development is made safe for its lifetime, in line with site specific recommendations in the SFRA Level 2.</p> <p>The Council therefore considers that the proposed site allocation statement is sound in regard to flood risk and the proposed change is not in itself required to make the plan sound.</p> <p>However, further detail from the SFRA Level 2 could be included in the site allocation statement in regards to this issue to provide further clarity in relation to on-site constraints. This could include the option identified in the SFRA Level 2 to review and update the 2005 Upper Aire model, through a detailed site specific FRA, to assess whether the outputs may lower the risk to the site based on more up-to-date hydrological conditions and model components.</p>	No action taken prior to submission
DF6: Regent House					
003	Mr Smith	English Heritage	Sound. This site lies within the boundary of the Leeds Liverpool Canal Conservation Area. Junction Bridge, to the south of the site, is a Grade II Listed Building. The site also lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore, welcome the site proposals that reflect the recommendations of the Heritage Assessment.	Comment noted.	No action required

015	Mr Sander on	West Yorkshire Archaeology Advisory Service (WYAAS)	Site DF6 Junction Mill has previously been recommended for archaeological recording in advance of conversion by WYAAS.	<p>Comment noted. SCRC/Policy NBE5 Criteria A. sets out that development will be expected to preserve and enhance the character, appearance and setting of key heritage assets within and adjacent to the Corridor, in accordance with Core Strategy Policy EN3: Historic Environment.</p> <p>Core Strategy Policy EN3 states where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>The Council therefore considers that the proposed site allocation statement is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may enhance the site allocation statement and provide further clarity to developers in regards to on site heritage issues.</p>	No action taken prior to submission
017	Ms Lambert	Environment Agency	Part of this site lies in flood zone 2, but this has not been identified in the site details. Any proposals for development on this site will need to be accompanied by a flood risk assessment.	<p>All proposed allocations have been informed by an update to date Strategic Flood Risk Assessment Level (SFRA) 2. The latest available data has been used to inform the SFRA Level 2 for the AAP. The Bradford Beck Model is considered up to date and the most robust and sound evidence available.</p> <p>The SFRA Level 2 indicates that this site is wholly within Flood Zone 1. The Council therefore considers that the proposed site allocation statement is sound and the proposed change is unnecessary.</p>	No action taken prior to submission
DF7: Junction of Dock Lane and Dockfield Road					
003	Mr Smith	English Heritage	Unsound. This site adjoins the boundary of the Leeds Liverpool Canal Conservation Area. It also lies within the Buffer Zone of the World Heritage Site at Saltaire. The Heritage Assessment recommended that the site allocation statement should include a requirement that <i>“any development will be expected to safeguard and enhance the setting of the Leeds Liverpool Canal Conservation Area”</i> In case the current planning permission is not built, the recommendations of the Heritage Assessment should also be included in the Site Proposals. Add to the end of the Site proposal:- <i>“... residential development. Any proposals will be expected to:- · safeguard and enhance the setting of the Leeds Liverpool Canal Conservation Area”</i>	The Council considers that the proposed site allocation statement is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may strengthen the site allocation statement by reflecting the detailed recommendations of the Heritage Assessment in regards to this particular site and provide further clarity to developers in regards to on site heritage issues.	No action taken prior to submission
DF9: Dockfield Road					
017	Ms Lambert	Environment Agency	Part of this site lies in flood zone 2. Development will be subject to the requirements for a flood risk assessment. We suggest this is mentioned in the assessment.	All proposed allocations have been informed by an update to date Strategic Flood Risk Assessment Level (SFRA) 2. Under AAP Policy SCRC/CC1 sites located in areas at risk of flooding will be expected to include	<p>1. No action taken prior to submission</p> <p>2. No action required</p>

				<p>flood risk mitigation measures to ensure that the development is made safe for its lifetime, in line with site specific recommendations in the SFRA Level 2.</p> <p>The Council therefore considers that the proposed site allocation statement is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change could provide further clarity to developers in regards to on site flood risk issues.</p>	
SE1: Shipley East					
003	Mr Smith	English Heritage	<p>Sound. The site lies within the Buffer Zone of the World Heritage Site at Saltaire. Therefore, we welcome the Site Proposals that any redevelopment of this area should provide that reflect the recommendations of the Heritage Assessment</p>	Comment noted.	No action required
009	T. Higginson (Client) A. Rivero (Agent)	Network Rail	<p>Support given to the policy allocation particularly in relation to the provision of additional car parking for the railway station (as was originally the case in the recent planning application). The opportunity to re-open the subway links through the station is noted but careful consideration will need to be given to the requirements of the operational railway in terms of security and maintenance if this is to be delivered.</p>	Comment noted.	No action required
0010	Mr Coy	Canal & River Trust	<p>Welcome and support that site SE1 'Shipley East' specifies that the line of the Bradford Canal is to be protected to accommodate future aspirations to reinstate the Bradford Canal, in accordance with Policy SCRC/ST8 'Bradford Canal'.</p> <p>In our previous responses to the Council on the AAP, we highlighted the Bradford Canal as an important component of Green Infrastructure and stated that protecting the line of the canal will help to ensure that a future restoration is feasible.</p> <p>Such an approach is consistent with paragraph 114 of the National Planning Policy Framework (NPPF), which calls for local planning authorities to plan 'positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It would also help to conserve an important heritage asset as paragraph 126 of the NPPF calls for local planning authorities to set out in their local plans 'a positive strategy for the conservation and enjoyment of the historic environment' and 'recognise that heritage assets are an irreplaceable resource.'</p> <p>Therefore, this aspect of the plan is Sound as it is consistent with National Policy.</p>	Comment of support noted.	No action required

011	Ms Stead	Bradford Urban Wildlife Group	<p>Mention is made of enhancements and of green corridors – habitat networks etc. Location of new open space and wildlife areas etc: on this so called underused land there is already a high biodiversity – consisting of over 12 species of Butterfly on this site including a species which is rare for West Yorkshire and Bradford</p> <p>So to Biodiversity and ecology P108 of the Councils AAP . 4.7.31 and 4.7.32 and with reference to the West Yorkshire Ecology Document – key aim to enable regeneration to take place in a way that minimises adverse impacts on Biodiversity. How is this going to be achieved on SE1 Shipley East with the large number of housed etc for this site?</p> <p>We have been asked to look into the soundness of the Councils documents- I will say this yet again that there is a conflict between Development and proposed green structure with no suggestion as to how this is to be carried out and whether Policy SCRC/NBE4 – Biodiversity and Ecology will be incorporated into plans by developers. The only answer to this is to allow an area on field SE1 Shipley East to be cordoned off before Development to be conserved for the high number of species here and left to be managed later – Development First and then replanting afterwards will not bring back the established species of lepidotera. I bring it to your attention again</p>	<p>The AAP is supported by an Ecological Assessment and Green Infrastructure (GI) Study.</p> <p>These studies have informed policies SCRC/NBE1 and SCRC/NBE4, which set out the approach to green infrastructure and ecology in the AAP. Major developments will be expected to demonstrate that they will positively contribute to enhancing green infrastructure and ecological networks, and include green infrastructure as an integral part of the design</p> <p>The relevant findings of these studies have also been included in the site allocation statement for SE1 which sets out how impacts on biodiversity and new greenspace should be achieved on the site.</p> <p>Site SE1 is identified as a key site to deliver new greenspace within the development under Policy SCRC/NBE1. The Bradford Beck also flows through the site and therefore policies SCRC/NBE2 and SCRC/NBE3 will apply in relation to the Beck as an important GI asset and habitat highway.</p> <p>In accordance with NPPF paras 109 and 114 the AAP will ensure future development in the Corridor provides new and enhanced green infrastructure, mitigates identified impacts and protects and enhances habitat networks and provides gains in biodiversity in line with the recommendations of the GI Study and Ecological Assessment. It is therefore considered that the AAP is sound.</p>	No action taken prior to submission
011	Ms Stead	Bradford Urban Wildlife Group	<p>Finally repeated guidelines say that no development should take place between March and August (especially if areas of trees and bushes will be involved – because of nesting birds etc and we would like to see developers respecting this rule especially in east SE1.</p> <p>How sound is the communication between the Council and Developers in this respect? Especially East SE1 which needs a road bridge over the Beck before development can take place. Respect this ruling is essential – should be part of this document.</p>	Noted. This issue will be considered as part of any detailed planning application and is not considered relevant to include in the AAP.	No action required

018	Miss Bust	The Coal Authority	The site schedule for SE1 does not specify the site is affected by mining legacy despite what paragraph 4.4.51 states. Reason – To aid the recognition of constraints to potential developers	Comment noted. The Council recognise the importance of identifying site specific constraints in regards to potential land instability. As set out in paragraph 4.4.51 all proposals in areas with mining legacy will be required to fully consider ground conditions, in line with the requirements of paragraphs 120-121 of the NPPF and Core Strategy Policy EN8: Environmental Protection. The Council considers that the site allocation statement as drafted is sound. However, specifying that development proposals will need to consider the potential presence of unstable land and any planning applications are expected to be accompanied by a Mining Risk Assessment would help aid recognition of constraints to potential developers in accordance with AAP para 4.4.51.	No action taken prior to submission
017	Ms Lambert	Environment Agency	1. Parts of SE1 are identified as being within flood zone 3b (functional floodplain). Table 3 of NPPG makes it clear that development is not appropriate in zone 3b (with the exception of essential infrastructure, subject to passing the Exception Test, and water compatible uses). This should be made much clearer in the AAP. The Environment Agency will object in principle to any development proposals for less, more or highly vulnerable uses in flood zone 3b. 2. Welcome the expectation for developers to provide ‘significant improvements to green infrastructure...’ Bradford Beck is currently achieving poor ecological status under the Water Framework Directive (WFD), and any proposals should ensure that the objectives of WFD to achieve good status in water bodies and to prevent pollutants entering waterbodies, are met and must not result in deterioration in the quality status.	1. Noted. All proposed allocations have been informed by an update to date Strategic Flood Risk Assessment Level (SFRA) 2. As set out in the site allocation statement development will be expected to: <ul style="list-style-type: none"> - be supported by a site specific flood risk assessment. - result in no net loss of the functional floodplain (flood zone 3b) and not increase flood risk elsewhere - safeguard areas of the functional floodplain for green infrastructure and water compatible uses. Under AAP Policy SCRC/CC1 sites located in areas at risk of flooding will be expected to include flood risk mitigation measures to ensure that the development is made safe for its lifetime, in line with site specific recommendations in the SFRA Level 2. In 2014 the site was granted planning permission (13/03792/MAF) which was supported by a site specific FRA. The Council therefore considers that the proposed site allocation statement is sound and the proposed change is not in itself required to make the plan sound. 2. Comment noted.	1. No action taken prior to submission 2. No action required
Centre Section sub area Development Framework					
003	Mr Smith	English Heritage	Centre Section Vision supporting text Unsound. This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then	This section, provides a framework for the sub area that builds upon the overall AAP vision and strategic	No action taken prior to submission

			<p>sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not. The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for the Centre Section. Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p> <p>Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account. This Policy should be based upon the supporting text for the Vision set out on page 44.</p>	<p>objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council consider that the Centre Section sub area development framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council do not consider that this section requires an additional policy as, in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.</p>	
0007	Ms Ledger	Sport England	<p>Welcome the reference to new and improved areas for sport will be included in the central area, however wish it to be acknowledged that the package of measures to replace the playing fields lost or prejudiced by the 2014 application (ref: 14/04818/MAF) does not represent adequate compensation in line with the NPPF para 74, without further research and testing that limited access to one Artificial Grass Pitch can adequately compensate for the loss of two football pitches and that the cricket pitch as relocated will not be prejudiced by the proposed adjoining development, as well as the requirement for a new relocated changing pavilion.</p>	<p>This comment relates to an individual planning application and is therefore not considered directly relevant to the tests of soundness or AAP. Weight can be given to the emerging AAP, which is a material consideration in regards to determination of the relevant planning application as set out in the policy response to 14/04818/MAF</p>	No action required
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	<p>The following points are noted and supported –</p> <ul style="list-style-type: none"> - Sub areas – the centre section – the creation of a series of new vibrant sustainable neighbourhoods located within a green and attractive setting - Para 3.28 2 areas of significant potential are identified - New Bolton Woods (NBW) and Bolton Woods Quarry (BWQ) - It is acknowledged that a collaborative approach has been established between the LPA and owners of the quarry intention is to cease operations and restate the site in a manor that contributes to the LPA’s housing and development objectives. My clients reconfirm this intent. - Para 3.32 – the need for sites within the centre section to be developed as part of the comprehensive regeneration of the area - Para3.36 – development in the centre section to include circa 2398 dwellings and new and improved areas for sport, recreation and open space - Page 44 – the identification of Bolton Woods Quarry as a key development opportunity 	<p>Comment of support noted</p>	No action required
Centre Section Development Framework Proposed Site Allocations					

003	Mr Smith	English Heritage	The Centre Section Allocations Unsound. The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy. In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan. Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i>	NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate. The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected, in accordance with NPPF para 157. It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs. The Council therefore considers that the proposed Centre Section site allocations as drafted are sound and the proposed change is not required to make the plan sound.	1. No action taken prior to submission
NBW1: New Bolton Woods					
003	Mr Smith	English Heritage	Sound. This site lies on the opposite side of the valley to the Grade II Registered Historic Park and Garden at Lister Park. Therefore welcome the requirement that proposals should have regard to the potential impact upon any important views from this registered park	Comment noted.	No action required
007	Ms Ledger	Sport England	<p>1. Proposed use. This should specially acknowledge the sports facilities current and proposed as well as the generic reference to ‘open space’.</p> <p>2. Open Space, Sport and Recreation: first and third bullet points, this should acknowledge the wording of the NPPF para 74 second bullet point that the sports facilities will be replaced by equivalent or better provision in quantity, quality and location terms. Although this steer is in national policy, clearly as the current master plan does not deliver on this so further reiteration would be of assistance. Although we note this is covered by policy SCRC/HSC2 and point 1 and para 4.8.38.</p> <p>3. Welcome contributions to offsite playing fields, this should be sought in line with the needs identified in the playing pitch strategy.</p> <p>4. Welcome the acknowledgement that new changing facilities are required and crucially a cricket pavilion. A new pavilion is vital to ensure adequate compensation, ECB regulations require that the wicket table can be viewed from the pavilion to ensure change of batsmen within a timely manner. Locations for such facilities also need careful consideration with regards to car parking and access.</p> <p>5. Welcome the final bullet point that new sports facilities should include adequate long term management provision and community access. We would recommend that <i>‘and improved’</i> be added between ‘new’ and ‘sports’ to cover improved facilities.</p>	<p>1. The Council considers that the proposed site allocation statement as drafted is sound and the proposed change is not in itself required to make the plan sound. However, the allocation statement could be made more accurate by acknowledging sports facilities under current use.</p> <p>2. The proposed change would repeat national policy in the NPPF and is therefore not considered necessary or required to make the plan sound. This issue is also covered by Policy SCRC/HSC2.</p> <p>3. Comment noted.</p> <p>4. Comment noted.</p> <p>5. The Council considers that the proposed site allocation statement as drafted is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may make the allocation statement clearer in regards to the need for new and improved sports facilities.</p>	<p>1. No action taken prior to submission</p> <p>2. No action taken prior to submission</p> <p>3. No action required</p> <p>4. No action required</p> <p>5. No action taken prior to submission</p>

0010	Mr Coy	Canal & River Trust	<p>Welcome and support that site specifies that the line of the Bradford Canal is to be protected to accommodate future aspirations to reinstate the Bradford Canal, in accordance with Policy SCRC/ST8 'Bradford Canal'. In our previous responses to the Council on the AAP, we highlighted the Bradford Canal as an important component of Green Infrastructure and stated that protecting the line of the canal will help to ensure that a future restoration is feasible.</p> <p>Such an approach is consistent with paragraph 114 of the National Planning Policy Framework (NPPF), which calls for local planning authorities to plan 'positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It would also help to conserve an important heritage asset as paragraph 126 of the NPPF calls for local planning authorities to set out in their local plans 'a positive strategy for the conservation and enjoyment of the historic environment' and 'recognise that heritage assets are an irreplaceable resource.' Therefore, this aspect of the plan is sound as it is consistent with National Policy.</p>	Comment of support noted.	No action required
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	<p>1. Within the text on site proposals it is stated that – “the joint venture company should work with the LPA, key stakeholders, adjoining landowners and the local community to bring forward a scheme that will deliver the comprehensive regeneration and required infrastructure for the suite as a whole” Whilst there has been dialogue my clients request that levels of communication are increased and improved in the interests of bringing forward the comprehensive proposals.</p> <p>2. Within the section on transport and movement my clients request the addition of the following text:- “ the development should also take explicit account of the adjacent Bolton Woods Quarry masterplan proposals 'and' explicitly that provision for access to secure the delivery of the Bolton Woods Quarry site should be ensured”</p>	<p>1. Comment noted. The Council support on-going dialogue between the adjoining land owners as set out in the relevant site allocation statement. It is considered that the AAP provides the necessary framework for co-ordinating investment and action across all partners.</p> <p>2. Noted. The Council considers that the proposed site allocation statement as drafted is sound and the proposed change is not in itself required to make the plan sound.</p> <p>In addition Policy SCRC/NBE6 Criteria 6 states development will be expected deliver comprehensive development on large scale residential sites which relates well, and links to, existing communities and key sites in the area.</p>	<p>1. No action taken prior to submission</p> <p>2. No action taken prior to submission</p>
017	Ms Lambert	Environment Agency	Fully support the aspirations of both the Green Infrastructure and Ecology, and Flood Risk sections for this site, which should bring multiple environmental benefits and help to achieve the objectives of WFD, and adaptation to climate change.	Comment of supported noted.	No action required
NBW6: North Queens Road					
003	Mr Smith	English Heritage	Sound. This site adjoins the boundary of the St Paul Conservation Area. Therefore welcome the requirement that proposals should safeguard and, where possible, enhance that area.	Comment noted.	No action required
NBW7: New Bolton Woods Flats					
018	Miss Bust	The Coal Authority	<p>The site schedules for the sites affected by mining legacy do not actually specify this despite what paragraph 4.4.51 states. The sites affected are: NBW7</p> <p>Reason – To aid the recognition of constraints to potential developers</p>	Comment noted. The Council recognise the importance of identifying site specific constraints in regards to potential land instability. As set out in paragraph 4.4.51 all proposals in areas with mining legacy will be required to fully consider ground	No action taken prior to submission

				<p>conditions, in line with the requirements of paragraphs 120-121 of the NPPF and Core Strategy Policy EN8: Environmental Protection.</p> <p>The Council considers that the site allocation statement as drafted is sound. However specifying that development proposals will need to consider the potential presence of unstable land and any planning applications are expected to be accompanied by a Mining Risk Assessment could make the site allocation clearer and help aid recognition of constraints to potential developers in accordance with AAP paragraph 4.4.51</p>	
BWQ1: Bolton Woods Quarry					
003	Mr Smith	English Heritage	<p>Unsound. There are two Grade II* Listed Buildings at the eastern corner of this area (Bolton Old Hall and Bolton Old Hall Cottage). Historic England has recently provided advice on a Planning Application for the development of this area (Application No. 15/06249/MAO). Bolton Old Hall was historically surrounded by agricultural land which was gradually eroded with the advancement of the quarry and residential development in the nineteenth and twentieth centuries. An area of land remains undeveloped to the south- west of the listed buildings and the rural nature of this part of the application site contribute strongly to our understanding of the Hall and Cottage. Whilst this setting has now been compromised, to some degree, by the quarry, the land outside the quarried area retains its rural character, providing an historic setting which contributes to the significance of Bolton Old Hall and Cottage. Given the loss of setting elsewhere, this remnant of undeveloped land is particularly important and provides an historic context and rural setting to the listed buildings.</p> <p>In order to ensure that the significance of these buildings is not harmed through the development of this area, the extent of the allocation should be amended to exclude the area between the curtilages of these Listed Buildings and Brockwater Drive. Amend the extent of Site BWQ1 to exclude the area between the curtilages of Bolton Old Hall and Bolton Old Hall Cottage and Brockwater Drive.</p> <p>2. Minerals. Sound. The Bolton Woods Quarry has been producing high-quality building stone since the middle of the nineteenth century and, as such, its products have helped to contribute to the distinct identity of the District. We welcome the requirement that the redevelopment of the quarry will need to provide for the prior extraction of any remaining stone reserves.</p>	<p>1. The council recognises the importance of ensuring the significance of heritage assets are not harmed through development. It is therefore stated in the allocation statement for the site that any development should ensure elements which contribute to the character or setting of Grade II* Listed Bolton Old Hall and Bolton Old Hall Cottage are preserved. This will be considered as part of the considerations of any planning application for the site to ensure any harm is avoided in accordance with NPPF para 133.</p> <p>The listed buildings are also highlighted as key heritage assets in the site allocation statement and paragraph 3.35 of the Centre Section Strategic Development Framework. It is therefore considered Policy SCRC/NBE5 of the AAP will provide appropriate mitigation by expecting development to preserve and enhance the character, appearance and setting of key heritage assets within and adjacent the AAP.</p> <p>Given the above the Council therefore considers that the proposed Shipley site allocation is sound and the proposed change is not in itself required to make the plan sound. However, the allocation statement could be strengthened in regards to this issue by identifying the key elements which contribute to the setting of the listed buildings and by including text stating any new development should seek to avoid substantial harm and take opportunities within the setting of the heritage assets to enhance or better reveal their significance.</p> <p>2. Comment noted.</p>	<p>1. No action taken prior to submission</p> <p>2. No action taken prior to submission</p>

014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	<p>1. the following points are noted and supported –</p> <ul style="list-style-type: none"> - The site is allocated for development with residential development as the preferred use (BWQ1) - The site has a strategic position above the new Bolton Woods site - The site is previously developed land of strategic size and scale - The site is a key opportunity for delivering significant housing and environmental improvement - The owners, my clients, are committed to bringing the site forward <p>2. Within the site proposals section the estimated capacity of the site is stated as 1000 dwellings. Following assessment of the site as part of the planning application process the total number of dwellings achievable on site is 700 dwellings. My clients request that the text be amended accordingly.</p> <p>3. in the other sections of key considerations and in relation to the section on transport and movement request that additional text be added to ensure that – “access through the adjacent New Bolton Woods site to the south be made explicitly available to guarantee the deliverability of the Bolton Woods Quarry site”</p> <p>4. Any obligations deriving out of a development scheme on a quarry site would have as a matter of principle be required to be subject to overall viability testing and request the addition of text within the plan to cover this point.</p>	<p>1. Comments of support noted.</p> <p>2. The proposed site allocation differs from the submitted redline boundary as part of the planning application process. The Council therefore consider the expected development as set out in the AAP is achievable and reflects a realistic and deliverable approach to providing new homes within the area.</p> <p>The site allocation statements set out expected development based on available evidence, however it is recognised that these figures may be subject to change following detailed site proposals. However, a key aim of the AAP is to maximise the delivery of housing on suitable sites as set out in the Policy SCRC/H2.</p> <p>The council will monitor the AAP in regards to housing delivery on identified sites and review the AAP if necessary. The council do not consider the proposed change necessary to make the plan sound.</p> <p>3. See response to Rep 014 in regards to site NBW1.</p> <p>4. Noted. As set out in the implementation and delivery section of the AAP, contributions will be collected in accordance with Core Strategy Policy ID3. Core Strategy Policy ID2: Viability sets out the overall approach to viability consideration in regards to site contributions . The Council therefore considers that the proposed change is unnecessary and is not in itself required to make the plan sound.</p>	<p>1. No action required</p> <p>2. No action taken prior to submission</p> <p>3. No action taken prior to submission</p> <p>4. No action taken prior to submission</p>
City Centre Fringe sub area Development Framework					
003	Mr Smith	English Heritage	<p>City Centre Fringe .Vision supporting text Unsound. This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account. However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decision maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for The City Centre Fringe. Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	<p>This section, provides a framework for the sub area that builds upon the overall AAP vision and strategic objectives, which sets out a clear strategy for enhancing the natural, built and historic environment in line with NPPF Para 156</p> <p>The Council considers that the Centre Section sub area development framework as drafted is sound and the proposed change is not required to make the plan sound.</p> <p>The council do not consider that this section requires an additional policy as, in line with the NPPF, only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Specific</p>	<p>No action taken prior to submission</p>

			Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account. This Policy should be based upon the supporting text for the Vision set out on page 59.	policies are included the area-wide policies within the AAP in Section 3, and the relevant policies in the Bradford District Core Strategy.	
City Centre Fringe Development Framework Proposed Site Allocations					
003	Mr Smith	English Heritage	City Centre Fringe Allocations Unsound. The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy. In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan. Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i>	NPPF para 157 sets out that Local Plans should allocate sites to promote development and flexible use of land, and provide detail on form, scale, access and quantum of development where appropriate It is considered that site allocations are tied to the Local Plan through Core Strategy Strategic Core Policy 5, which states that the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs. The proposed site allocations are identified on the Policies Map and provide detail on the type and scale of development expected in accordance with NPPF para 157. The Council therefore considers that the proposed Shipley site allocations as drafted are sound and the proposed change is not required to make the plan sound.	No action taken prior to submission
Delivering a Wide Choice of High Quality Homes in the Corridor					
SCRC/H1 Housing Requirement					
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	The following points are noted supported and commented upon - major new housing development forming 2 new sustainable neighbourhoods within the centre section of the corridor area will be focused at New Bolton Wood and Bolton Woods Quarry	Comment of support noted.	No action required
SCRC/H2 Delivering new homes and sustainable neighbourhoods					
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	The following points are noted supported and commented upon 1. a density of 40 dwellings per hectare should be considered where possible – my clients would suggest flexibility with regards this figure given individual site characteristics and in particular the topographical features of the quarry site 2. Para 4.3.10 – where a reduction in affordable housing provision is sought due to financial viability the viability of the scheme should be considered on a phased basis as each phase of the development comes to be developed My client acknowledges that phasing is an appropriate element of development appraisal assessment but suggest that this wording does need to be amended to reflect the viability of any scheme as a whole at the outset justified by the submission of appropriate evidence.	1. The council considers Policy SCRC/H2 as drafted is sound. The policy has been written to allow flexibility where normal density targets cannot be achieved given site specific factors, in accordance with Core Strategy Policy HO5. 2. Comment of support noted. 3. The Council considers Policy SCRC/H2 as drafted is sound. In order to maximise the delivery of affordable housing it is considered appropriate for viability to be considered on a phased basis for larger scale housing sites such as Bolton Woods Quarry. The council therefore do not consider the proposed change would be effective in regards to delivery of affordable housing.	1. No action taken prior to submission 2. No action required 3. No action taken prior to submission
016	Ms Howson	Bradford Co Housing	1. Welcome the intention set out in 4.3.18 to support the development of self and custom build and suggest that this could be explicitly linked to new	1. Noted. The intention of the AAP is not to limit support for self-build to the Centre Section. This area	1. No action taken prior to submission

			<p>legislation which comes into effect in April 2016 which places requirements on local authorities to support self and custom building. We are however disappointed that this intention is limited to the Centre section and would suggest that it could apply to all 3 sections of the AAP.</p> <p>We would be keen to support policy ambitions in the AAP to improve community infrastructure and development of accessible green spaces and allotments. This could be through our common house being available as a venue for the wider community and our group managing allotments which were used by the wider community as well as ourselves.</p> <p>Our ambition to create a co-housing community would sit well with policy SCRC/H2 to develop new homes and sustainable neighbourhoods, and with Core Strategy Policy HO11 to build affordable homes – we are planning to adopt a version of the mutual home ownership scheme (MHOS) developed by LILAC an established co-housing community in Leeds, which shares costs across the co-housing community, thus enabling those who are less well off to afford to live there.</p> <p>As our aim is to be a low carbon impact community and to use public transport and bikes rather than cars, we would require far fewer car parking spaces than most developments and so would want to maximise green/growing space.</p> <p>2. Ideally we would like a site of about 1.5 acres in the Shipley area. We are therefore very interested in the plans for the Shipley/Canal Road Corridor and in particular would be interested in plots DF1, SE1, NWB1 and possibly NWB2 – either to develop ourselves or as part of a bigger development.</p> <p>We feel that our ambition to create a low impact, eco friendly sustainable and affordable community fits very well with the policy drivers articulated in the AAP and would welcome the opportunity to discuss the integration of a self build co-housing scheme within your plans for the Shipley and Canal Road Corridor.</p>	<p>has been identified as significant opportunity to deliver this type of housing as it contains two larger scale housing sites (NBW1 and BWQ2), which offer the opportunity to deliver a range of house types, including self-build as part of the overall housing mix.</p> <p>The Policy as drafted is considered sound. It is therefore not considered necessary to link this policy to the Self Build and Custom House building Act 2015.</p> <p>2. Noted. The Council recognise that the ambitions of Bradford Co-housing group align with the objectives of the AAP and Urban Eco Settlement principles and will contribute to delivering a diverse mix of high quality sustainable and affordable housing. Policy SCRC/H2 and Core Strategy HO8 supports custom/self-build on appropriate sites or as part of the overall housing mix.</p>	<p>2. No action taken prior to submission</p>
Achieving Sustainable Economic Growth in the Corridor					
Policy SCRC/SE7 Minerals Safeguarding					
018	Miss Bust	The Coal Authority	<p>1. The AAP area contains coal resources which are capable of extraction by surface mining operations. These resources cover most of the AAP area, except for the northern Shipley centre end.</p> <p>The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.</p>	<p>Comment noted. Policy SCRC/SE7: Minerals Safeguarding sets out that the within the AAP boundary must give full consideration to the extraction of mineral resources prior to development taking place, in accordance with Core Strategy Policy EN12</p>	<p>No action taken prior to submission</p>
018	Miss Bust	The Coal Authority	<p>1. Policy SCRC/SE7 sets out an appropriate planning framework for mineral safeguarding as required by Policy EN12 of the Core Strategy. Paragraph 4.4.51 identifies locally distinctive issues with regard to land instability in the AAP area. It further identifies the relevant sites affected throughout the plan will identify the need to consider this issue.</p>	<p>1. Comment of support noted.</p> <p>2. Comment noted. The Council recognise the importance site specific constraints in regards to potential land instability. As set out in paragraph</p>	<p>1. No action required</p> <p>2. No action taken prior to submission</p>

			<p>The approach of the AAP is supported, and the following sites correctly identify mining legacy:</p> <ul style="list-style-type: none"> • NBW1 – New Bolton Woods • BWQ1 – Bolton Woods Quarry <p>2. However the site schedules for two of the sites affected by mining legacy do not actually specify this despite what paragraph 4.4.51 states. The sites affected are:</p> <ul style="list-style-type: none"> • SE1 – Shipley East • NBW7 – New Bolton Woods Flats <p>Reason – To aid the recognition of constraints to potential developers</p>	<p>4.4.51 all proposals in areas with mining legacy will be required to fully consider ground conditions, in line with the requirements of paragraphs 120-121 of the NPPF and Core Strategy Policy EN8: Environmental Protection.</p> <p>The Council considers that the site allocation statement as drafted is sound. However, the proposed change could make the site allocation clearer and help aid recognition of constraints to potential developers in accordance with AAP para 7.4.51.</p>	
Maximising Sustainable Transport Options and Connecting the Corridor					
0002	Mr Watson	Individual	<p>It is vital that we do not operate back to front with any developments in this area. The first step, before properties are erected, must be to substantially improve the transport infrastructure in this congested area.</p> <p>As a start Canal Road should be dualled all the way from Shipley to Bradford before the commencement of any work.</p> <p>Secondly, it is vital that a Shipley Eastern Bypass is urgently moved forward so that this is in place not too long after the proposed developments have been completed.</p> <p>For far too often in Bradford we have seen inappropriate developments with no significant improvements to the transport infrastructure at all.</p>	<p>The council recognise improvements to the transport network are a key element of the AAP. The AAP is supported by a Transport Study, which identifies potential interventions that should be delivered to support growth and accommodate additional demand. Figure 10 on page 87 of the AAP identifies key transport improvement measures in the Corridor.</p> <p>The council recognise the importance of ensuring that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. The AAP is therefore supported by an Infrastructure Delivery Plan which contains an infrastructure delivery programme. Strategic transport improvements will be delivered primarily through Government transport funding sources. Identifying key transport improvement measures in the AAP will help support bids for future transport investment. In addition, future developments in the Corridor will be required to contribute towards or provide local transport improvements necessary to support developments as set out in AAP Policy SCRC/ST1.</p> <p>It is therefore considered that the policy approach as set out in the Maximising Sustainable Transport Options and Connecting the Corridor section of the AAP provides an effective basis for ensuring transport improvements are delivered in the Corridor to support housing growth. The council do not consider the proposal for no sites to be brought forward before substantial improvements to transport infrastructure to be justified or effective.</p>	No action taken prior to submission
004	T. Rios	Highways England	<p>Significant new development is proposed in the AAP Corridor in Policy SCRC/H1 including a minimum of 3,100 new homes. Three of the proposed residential sites are large and will generate significant volumes of traffic in the peak hour. We have therefore used our Network Analysis Tool (NAT) to determine whether</p>	<p>The Council recognise significant growth is planned in the District as set out in the Core Strategy and the SCRC AAP and that potential impacts on the Strategic Road Network (SRN) therefore need to be considered.</p>	No action taken prior to submission

		<p>these proposed housing sites generate sufficient traffic to have an impact on the Strategic Road Network (SRN).</p> <p>Our analysis shows that Site SE1 Shipley has no significant traffic impact on the SRN. The implication is that the other smaller sites proposed for development in Shipley will also not have a significant traffic impact on the SRN.</p> <p>However, the analysis also shows that Site NBW1 New Bolton Woods and Site BWQ1 Bolton Woods Quarry together generate a southbound flow of 70 vehicles on the M606 between the Staygate roundabout and M62 junction 26 Chain Bar. This will combine with traffic generated by proposed developments in Bradford city centre and South East and South West Bradford to increase traffic volume on the SRN.</p> <p>Analysis undertaken as part of the Highways England West Yorkshire Infrastructure Study (WYIS) indicates that traffic generated by Local Plan development in Bradford and the other districts in West Yorkshire does not result in any severe congestion on the M606. The WYIS does show that the M62/M606 Chain Bar scheme included in the government's Road Investment Strategy (RIS) will provide some capacity to cater for the additional traffic generated by proposed Local Plan development in Bradford and the rest of West Yorkshire however further capacity enhancement to existing slip roads may also be required by 2030. It also shows that capacity improvements will be needed at M62 junction 27 by 2022 and again by 2030.</p> <p>We have three comments arising from our modelling work:</p> <ul style="list-style-type: none"> • In general, the committed RIS schemes where construction is to be commenced in the period 2015/16-2019/20 should provide sufficient capacity on the SRN in and around Bradford to accommodate traffic generated by Local Plan development in West Yorkshire up to 2020. • The phasing of development of Site NBW1 New Bolton Woods and BWQ1 Bolton Woods Quarry will need to take account of the timing of the RIS capacity enhancement schemes. • Where sites have an adverse individual impact on the SRN transport assessments will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to additional schemes identified by the Highways England WYIS and included in the LIP or other appropriate schemes. <p>The three actions identified above will help to minimise the risk of traffic congestion due to insufficient capacity on the strategic road network.</p>	<p>The Core Strategy and AAP have been supported by Transport Studies and Infrastructure Delivery Plans, which have been informed by engagement with key stakeholders.</p> <p>AAP Policy SCRC Policy SCRC/ST3: sets out proposals will need to be supported by detailed Transport Assessments to ensure adequate local mitigation for new development. It is therefore considered the Plan as drafted is sound in regards to minimising traffic impacts. However including the issues and actions in relation to phasing and impacts on SRN s part of this section of the plan and relevant site allocation statements for BWQ1 and NBW1 may help to provide further clarity on this issue.</p>	
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008	Ms Fowler	Local Resident	<p>Regarding; "Maximising sustainable transport options and connecting the Corridor..." "Promoting healthy, strong and inclusive communities living in and alongside the Corridor ..." "Improving Health, Wellbeing and Quality of Life"</p> <p>Whilst the quality of air in the area is discussed as an issue, I want to highlight how important it is that we actually reduce air pollution levels in the area rather than increase them.</p> <p>The plan discusses sustainable transport options and air quality but as the levels on Otley Road and Valley Road are already so high, any increase in traffic which the developments will bring will have an adverse effect on these levels and consequently the health of the people of Shipley and Bradford.</p> <p>There are already schools and housing on these roads - for example; Shipley Cof E Primary's playground is next to Otley Road. A recent study by the University showed a link with air pollution and low birth weights in Bradford.</p> <p>The report acknowledges that the planned developments will increase traffic with the resulting impact on public health and on services. This is unacceptable and the Council should be doing everything it can to reduce traffic levels and air pollution.</p>	<p>The council recognise the importance of the issue of air quality.</p> <p>Maximising sustainable transport options and connecting the Corridor contains a range of policies and proposed interventions aimed at mitigating the impact of proposed growth, reducing car journeys and supporting sustainable transport options.</p> <p>Paragraphs 4.8.11 to 4.8.19 of the AAP set out the AAP approach to managing air quality in the Corridor.</p> <p>This includes identifying the two Air Quality Management Areas (AQMA) within close proximity to the AAP boundary.</p> <p>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 for Bradford and associated guidance documents.</p> <p>The council therefor considers that the AAP approach as drafted is sound and in accordance with NPPF para 124.</p>	No action taken prior to submission
012	Ms Knamiller	Local Resident	<p>As a local resident and parent I am very concerned about the air quality in our area. I requested a Freedom of Information disclosure on the air quality on Otley Road, between the junction with Keighley Rd and Shipley Airedale Road, as this is where Shipley Primary School is. The information I received was that the air at this point was not monitored but there was good reason to assume both particulates pollution and oxides of nitrogen would be high in this area. Informally, I know people who have measured air quality at this site in 2014 and have found it to be at legal limits.</p> <p>The planned further development in the Shipley area will lead to increased traffic which is going to push the air pollution beyond the legal limits. I cannot therefore agree in any sense to the paragraph on page 83, stating that local resident's health will be enhanced (point no.10). I do not find the plan has any adequate or effective means of addressing air quality at all. This is in light of the Born in Bradford study which has clearly stated a link between vehicle emissions and small birth weight in babies, and other evidence linking respiratory diseases and poor air quality. While this will have an impact on all in the area, pedestrians, cyclists and drivers (as air quality is also poor within vehicles), I am particularly concerned about children at Shipley C of E Primary. The nursery and reception playgrounds directly boarder the road where air quality is poor. It is known that poor air quality has a bigger impact on young children than on older people.</p>	<p>The Council recognise the importance of the issue of managing air quality. AAP Strategic Objective 8 is to Enhance resident's health and education outcomes by reducing pollution and managing air quality in the area.</p> <p>The Maximising sustainable transport options and connecting the Corridor section of the AA sets out a range of policies and proposed interventions aimed at mitigating the impact of proposed growth, reducing car journeys and supporting sustainable transport options. Paragraphs 4.8.11 to 4.8.19 set out the AAP approach to managing air quality in the Corridor. This includes identifying the two Air Quality Management Areas (AQMA) within close proximity to the AAP boundary.</p> <p>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 for Bradford and associated guidance documents.</p>	No action taken prior to submission

			I therefore object to the Shipley Area Action Plan. It is by no means 'sustainable' as it claims to be. To only focus on increasing active transport while not addressing the increase in vehicles and especially large, diesel vehicles, is a failure.	The council therefore considers that the AAP approach as drafted is sound and in accordance with NPPF para 124.	
013	Mr Robison	Local Resident	<p>What I've managed to glean from the plan, is that there will be a lot more HGV traffic (diesel emissions no doubt) and cars driving through areas which are already borderline if not totally illegal in terms of pollution levels. Manningham Lane, Otley Rd etc.</p> <p>I'm basically terrified that you're just using 'economic growth' to justify a continued increase in motor traffic, HGVs, building on green spaces and either don't understand or don't care about genuine environmental well-being and the social and health benefits that follow from it for communities (never mind the economic benefits - which are not guaranteed at all given the cost to the NHS of increased air pollution).</p> <p>I already have to walk my daughter to School through a mass of HGV pollution. You clearly are not concerned about reducing this but instead are proposing to increase it.</p> <p>A solid plan to reduce HGV traffic and car traffic with clear targets and penalties if these targets are not met. Without this, the word sustainable is not one you can honestly use</p>	<p>It is recognised that there will be an increase in traffic growth as a result of the planned growth in the District. However, it is considered that the AAP provides a plan for sustainable development and growth, which balances the economic, environmental and social dimensions of sustainable development.</p> <p>The Maximising sustainable transport options and connecting the Corridor section of the AAP set out a range of policies and proposed interventions aimed at mitigating the impact of proposed growth, reducing car journeys and supporting sustainable transport options. Paragraphs 4.8.11 to 4.8.19 set out the AAP approach to managing air quality in the Corridor. This includes identifying the two Air Quality Management Areas (AQMA) within close proximity to the AAP boundary.</p> <p>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 for Bradford and associated guidance documents.</p> <p>The Council therefor considers that the AAP approach as drafted is sound and in accordance with NPPF para 124. The AAP includes plans which will facilitate the use of sustainable modes of transport and minimise the need to travel in accordance with NPPF paras 30 and 34. It is not considered deliverable or reasonable for the AAP to include a plan to reduce HGV and car traffic as this is outside the remit of the Local Plan.</p>	No action taken prior to submission

NDM1	Ms Clement	Local Resident	<p>1. I would like to raise my concerns around the proposals which will increase traffic around the Canal Road/Otley Road/Keighley Road junctions. There is a lack of clarity in the plans relating to what will happen with the Branch Hotel itself. I live very close to these junctions and am concerned on the elevated pollutant levels which will be experienced by the primary school. Not to mention the increased speed of traffic around the area.</p> <p>2. There are elements of the plan which will improve Bradford but I do not believe that there have been comprehensive and deliverable enough plans for the sustainable and integrated transport for the developments.</p>	<p>1. The AAP is supported by a Transport Study. This has identified key transport improvement measures required to accommodate growth and mitigate impacts of new development. Figure 10 identifies key junctions requiring improvement. The branch is identified as a junction requirement improvement however this is outside of the AAP boundary. It is therefore not considered appropriate to include details of junction improvements in the AAP.</p> <p>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 for Bradford and associated guidance documents.</p> <p>2. Comment noted. It is considered that the AAP is sound and deliverable and has been informed by robust evidence and full sustainability appraisal.</p>	<p>1. No action taken prior to submission</p> <p>2. No action taken prior to submission</p>
Policy SCRC/ST1: Transport Improvement					
006	Ms Garside	Yorkshire Wildlife Trust	Welcome the requirement for transport schemes 'to take opportunities to enhance green infrastructure, biodiversity and habitat networks along the Corridor in line with Policy SCRC/NBE4 Biodiversity and Ecology and Policy SCRC/NBE1 Green Infrastructure'. Such is in accordance with Paragraph 118 of the NPPF.	Comment of support noted.	No action required
010	Mr Coy	Canal & River Trust	Support proposals to improve access within Shipley and the canal. The canal and towpath is a key component of green infrastructure that provides a car free transport route through Shipley promoting healthy lifestyles as people walk and cycle to work and school, thereby reducing congestion and pollution on the local road network. The AAP identifies several development sites along the Leeds and Liverpool Canal. New developments in the vicinity of the canal can lead to an increased burden on the waterway infrastructure, for example by increasing the use of the towpath by pedestrians and cyclists, expectations in relation to the cleanliness and condition of the waterway or an increased risk of flooding due to surface run-off. Such impacts could result in deterioration in the quality and condition of the canal infrastructure, to the detriment of all users of the canal corridor. As such we welcome that the Policy will ensure that new development will be required to support the implementation of local transport improvements through design and access considerations and/or developer contributions. Such an approach is consistent with paragraph 114 of the National Planning Policy Framework (NPPF), which calls for local planning authorities to plan 'positively for the creation, protection, enhancement and management of green infrastructure.	Comment of support noted.	No action required
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	The following points are noted supported and commented upon <ul style="list-style-type: none"> - any transport improvements deemed necessary would be determined by individual scheme assessments and integrated into a comprehensive framework. 	Comment noted.	No action required

Policy SCRC/ST5: Pedestrian and Cycle Movements					
010	Mr Coy	Canal & River Trust	<p>Support the Policy especially in relation to the Airedale Greenway which includes the Leeds & Liverpool Canal towpath. The Airedale Greenway is identified as a strategic cycle and walking route on the policies map and the Policy requires that all development proposals adjacent to, or impacting on, key strategic routes will be expected to aid in the delivery of and contribute to an appropriate and proportionate level of public realm improvements to these routes. It is important to recognise that new waterside developments place extra liabilities and burdens on waterway infrastructure and also provide an opportunity for this infrastructure to be improved.</p> <p>For example, increased usage of the towpath. Such a policy approach is consistent with paragraph 114 of the National Planning Policy Framework (NPPF), which calls for local planning authorities to plan 'positively for the creation, protection, enhancement and management of green infrastructure. The canal and towpath are key components of green infrastructure. Therefore, the policy is sound as it is consistent with National Policy.</p>	Comment of support noted.	No action required
Policy SCRC/ST8: Bradford Canal					
010	Mr Coy	Canal & River Trust	<p>The Bradford Canal which linked Bradford City Centre with the Leeds and Liverpool Canal at Shipley was closed in 1922 and has since been in-filled. In 2006, the Council proposed a restoration scheme to reopen the canal as a major component and catalyst for the wider regeneration of Bradford and the Shipley road canal corridor. The Trust supports such proposals that widen the inland waterway network. In our previous response to the Issues and Options consultation, we recommended a Policy that safeguards the route of the Bradford Canal is included within the AAP to fully support a future restoration scheme. As such, we note that policy SCRC/ST8 specifies that an alignment for the proposed re-introduction of the Bradford Canal will be protected to enable its future provision.</p> <p>Furthermore, figure 12 identifies the safeguarded route, and several proposed development sites along the safeguarded route will accommodate future aspirations to reinstate the Bradford Canal. We support this approach and note that it is consistent with paragraph 114 of the National Planning Policy framework (NPPF), which calls for local planning authorities to plan 'positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Furthermore, it would also help to conserve an important heritage asset as paragraph 126 of the NPPF calls for local planning authorities to set out in their local plans 'a positive strategy for the conservation and enjoyment of the historic environment' and 'recognise that heritage assets are an irreplaceable resource.' Therefore, this aspect of the plan is Sound as it is consistent with National Policy.</p>	Comment of support noted.	No action required
Mitigating and adapting to climate change along the Corridor					
Policy SCRC/CC1: Flood Risk and Water Management					

017	Ms Lambert	Environment Agency	We support this policy. It should be noted, however, that as a result of the Boxing Day 2015 floods, a number of properties in Bradford were affected which have not previously flooded. It is imperative that the flood outline for this event is considered and appropriate mitigation proposed in any future flood risk assessment for development proposals. It may also be appropriate to consider the impact from this flood event in the Level 2 SFRA.	Comment of support noted. All proposed allocations have been informed by an update to date Strategic Flood Risk Assessment Level (SFRA) 2. The latest available data has been used to inform the SFRA Level 2 for the AAP. The Bradford Beck Model is considered up to date and the most robust and sound evidence available.	No action taken prior to submission
Policy SCRC/CC2: Sustainable Design and Construction					
016	Ms Howson	Bradford Co Housing	Cohousing is a community where each household has an individual flat or house and together share a common house where meals and activities can be organised jointly plus a laundry, guest rooms and workshop shared. Our intention is to self-build to high environmental standards in order to create an affordable low impact, sustainable community which is part of and interacts with, the wider community. Our ambition is to build to high ecological standards that would support policy SCRC/CC2 on sustainable design and construction. We intend to use Build for Life 12 industry standards. We intend our dwellings to be accessible and adaptable.	Comment noted.	No action required
Protecting and Enhancing the Natural and Built Environment of the Corridor					
Policy SCRC/NBE1: Green Infrastructure					
006	Ms Garside	Yorkshire Wildlife Trust	Welcome and support the proposed policy on green infrastructure. We advise that all blue/ green infrastructure is managed and designed to provide net gains in biodiversity. Part of the Shipley & Canal Road AAP area is within our Aire Valley Living Landscape. This is an area that we have identified as an important corridor for wildlife which connects habitats and allows wildlife to move between areas. In our Living Landscape areas we hope to restore, recreate and reconnect wildlife-rich areas by working in partnership with local communities, landowners, schools and businesses.	Comment of support noted. Policy SCRC/NBE4 aims to minimise impacts on biodiversity and provide net gains in biodiversity where possible. This approach has been supported by an Ecological Assessment and Green Infrastructure (GI) Study. The GI study has taken into account the finding of the Ecological Assessment.	No action taken prior to submission
011	Ms Stead	Bradford Urban Wildlife Group	To Consider Aspects of the Corridor a) Development – Houses etc large numbers b) Cycle Track c) An area put aside for re-introducing the Bradford Canal d) Linear Park – Canal Road Greenway Bradford Beck e) included nectar Highway and butterfly express Looking at the map of green infrastructure Framework Figure 13 we see multifunctionality however how sound is all this? We see a complicated structure, which will be difficult to achieve P103: 4.7.11 Shipley East (SE1) included in this the paragraph suggest green space should be provided within the site- (this should be defined as an area to be Cordoned off as a butterfly site – As it is and managed later as a wildlife area.). Example given of developers agreeing to lease an area for wildlife – example – Oak Shea, Eldwich/Gilstead and Barratts (who have successfully allowed a complete translocation of a bee orchard site(with butterfly larvae)	Comment noted. The Green Infrastructure Framework has been informed by the Green Infrastructure Study. Under Policy SCRC/NBE1 site SE1 is identified as a key site for new greenspace within the development. Further detail is provided in the site allocation statement. The council recognised the importance of ensuing wildlife is protected as identified in the good example submitted. However the council consider the proposed change unnecessary as the site allocation for SE1 already includes sufficient detail about this issue. It is considered Policy SCRC/NBE1 is sound and based on robust evidence.	No action taken prior to submission

			onto higher ground.) This is the way forward and should be included in this Document i.e. to retain sections for wildlife within the development (as it is) when Biodiversity levels are high.		
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	The following points are noted and supported <ul style="list-style-type: none"> - Para 4.7.13 – suggests the creation of a linear park linked to a revitalised Bradford Beck between Gaisby Lane and Briggate and a new eco settlement park within the Bolton Woods Quarry site. My clients consider that the Bolton Woods Quarry site has been incorrectly referenced in relation to this aspect and whilst any development proposal would consider ecology and greenspace aspects this reference does not appear relevant to the quarry site. Further clarification is requested on this point. 	The AAP is supported by a green infrastructure study. The Green Infrastructure Study identifies the Bolton Woods Quarry (BWQ1) site as a key site for delivering new greenspace within development. This includes an opportunity to create a new park within the Bolton Woods Quarry site to serve new and existing communities as part of the GI Framework for the Corridor. The site has therefore been identified as a key site, which should provide new and enhanced greenspace within the development under Policy SCRC/NBE1. In line with Policy SCRC/NBE1 development proposals will be expected to demonstrate that they will positively contribute to enhancing green infrastructure and ecological networks, and include green infrastructure as an integral part of the design.	No action taken prior to submission
017	Ms Lambert	Environment Agency	Welcome and fully support this policy.	Comment of support noted.	No action required
Policy SCRC/NBE2 Waterway Environments					
003	Mr Smith	English Heritage	Sound. Support this Policy especially those elements which relate to the conservation and enhancement of the character and setting of the waterways. The Leeds Liverpool Canal is a Conservation Area and has numerous historic buildings and other heritage assets along its length. This Policy should assist in ensuring that the full potential which these assets can make to the regeneration of this part of the District is realised.	Comment of support noted.	No action required
010	Mr Coy	Canal & River Trust	Welcome the policy on waterway environments which specifies the Leeds & Liverpool Canal and note the requirement that development proposals should positively relate to, and take advantage of, proximity to waterways and support their economic, recreational, environmental, historic and ecological value. Such an approach will help to ensure that development adjacent to the canal will fully acknowledge and enhance its waterway setting and seek to mitigate the impacts of the development on the waterway. Furthermore, this Policy will be consistent with many of the requirements and aims of the National Planning Policy Framework; in particular promoting sustainable transport, requiring good design, promoting healthy communities and conserving and enhancing the natural and historic environments. Therefore, we consider that this aspect of the plan is sound.	Comment of support noted.	No action required
017	Ms Lambert	Environment Agency	Whilst we would prefer to see the inclusion of a direct WFD reference, the objectives of WFD are implicit within the type of improvements listed. We suggest the words “where appropriate and feasible” can be removed from point B as developments negatively impacting on watercourses are unlikely to be compliant with WFD anyway.	Comment noted. The Council considers that Policy SCRC/NBE2 as drafted is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may help to strengthen the policy in relation to the Water Framework Directive objectives.	No action taken prior to submission

Policy SCRC/NBE3: The Bradford Beck					
006	Ms Garside	Yorkshire Wildlife Trust	Welcome and support the proposed policy to enhance the environmental quality of the Bradford Beck. Such is in accordance with Paragraph 118 of the NPPF. Advise that all developments along the beck provide ecological enhancements that complement the beck habitat.	Comment of support noted. Criteria B of Policy NBE3 sets out that development of sites adjacent to the Bradford Beck will be expected to support its enhancement as an accessible, clean and visible waterway and habitat highway.	No action taken prior to submission
017	Ms Lambert	Environment Agency	Fully supportive of maximising opportunities to re-naturalise watercourses, particularly opening up existing culverts. These bring not only huge benefits to wildlife, but also help to manage flood risk.	Comment of support noted.	No action required
Policy SCRC/NBE4 Biodiversity and Ecology					
005	Mr Hall	Natural England	There is a need in paragraph 4.7.33 to reflect modified policy SC8 and the descriptions of the zones related to the SPA and we would expect this section of the plan to make more explicit reference to recommendations in HRA. Welcome the requirement in 4.7.39, however this too needs to reflect the latest version of Policy SC8 and reflect the revised definitions of the zones in that policy.	<p>Comment noted. The Council recognise the AAP should reflect the policies in the Core Strategy, however the Core Strategy is still at Examination with proposed main modifications in relation to this issue due to be discussed at further hearing sessions before the final Inspectors Report.</p> <p>It is therefore not considered appropriate to update the AAP in relation to this issue before submission at this time as the final policies may change before the AAP Examination. However, the council recognise modifications to the AAP may be necessary in order to reflect final policies in the Core Strategy.</p>	No action taken prior to submission
006	Ms Garside	Yorkshire Wildlife Trust	Point A. 3. Welcome and support the wording for station improvements to 'enhance biodiversity and ecological assets in line with Policy SCRC/NBE4 Biodiversity and Ecology'.	Comment of support noted.	No action required
011	Ms Stead	Bradford Urban Wildlife Group	<p>1. Shipley Station Butterfly Garden local wildlife site (incidentally is not a garden – part of an unploughed meadow already existing. A garden suggests a planted meadow. This is not so – We would like this corrected.) The word garden suggests planting. We are pleased that the proposals for Shipley Station are to safeguard (and mitigate) any adverse impacts on Shipley Butterfly meadow – however network Rail the owners of the land will have to be consulted over new proposals. The meadow should stay exactly as it is.</p> <p>2. Habitat Highways Table 3 –pleased that the Council has taken seriously the importance of conserving for butterflies i.e. the Nector Highway and the Butterfly Express (evidence from the Ecological Assessment 2014). Looking at the map (figure 14) for Habitat Highways – we see a very wide area (covering also the field SE1) this is good. However again, how is the highway to be fitted into the high Development expected on this field? We are told the Council will work with landowners, developers and local wildlife groups to support the delivery of ecological enhancement projects etc (4.7.41 Table 3). We hope this will be carried out and developers will accept this ruling otherwise a more legal imperative will be needed. In conclusion both the Council environmental section and the Shipley Canal Road Corridor ecological Assessment from West Yorkshire Ecology are excellent- but how sound is the Assessment relating to implementation?</p>	<p>1. Comment noted. The change proposed is not in itself required to make the plan sound. However, the proposed modification could help to ensure the site is more appropriately named.</p> <p>2. The AAP is supported by an Ecological Assessment and Green Infrastructure (GI) Study.</p> <p>These studies have informed policies SCRC/NBE1 and SCRC/NBE4, which set out the approach to green infrastructure and ecology. Major developments will be expected to demonstrate that they will positively contribute to enhancing green infrastructure and ecological networks, and include green infrastructure as an integral part of the design.</p> <p>Based on the above it is considered the AAP is sound in accordance with NPPF paras 109 and 114 and will ensure future development in the Corridor provides new and enhanced green infrastructure, mitigates identified impacts and protects and enhances habitat</p>	<p>1. No action taken prior to submission</p> <p>2. No action taken prior to submission</p>

				networks and provides gains in biodiversity, in line with the recommendations of the GI Study and Ecological Assessment.	
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	Table 3 page 117 – habitat highway –my clients would request clarity on this point as appears unrelated to the quarry site	<p>Table 3 is on page 109 of the AAP. Table 3 identifies Habitat Highways. These have been identified in the Green Infrastructure Framework informed by evidence in the Ecological Assessment.</p> <p>The Ecological Assessment has identified an important ecological corridor along the eastern side of the Shipley – Canal Road Corridor AAP area, reaching as far as the northern end of the Bradford City Centre AAP area. This includes areas of species-rich acid and neutral grasslands within and around the Quarry site (Ecological Assessment para 4.8.2, Figure 54).</p> <p>The Ecological Assessment identifies that these habitats should be retained and enhanced wherever possible (see Section 4.8.2 below). In line with Policy SCRC/NBE4 proposals should enhance and strengthen habitat highways and take advantage of the key opportunities, identified in the Ecological Assessment.</p>	No action taken prior to submission
017	Ms Lambert	Environment Agency	Support this policy, subject to a minor wording change in point A, as highlighted below 'Development proposals likely to have an adverse effect on biodiversity, important habitats and or areas designated as a Local Wildlife Site, Site of Ecological/ Geological Importance, (SEGI))or Bradford Wildlife Area (BWA) will be assessed in accordance with Core Strategy.'	Comment of support noted. The Council considers that Policy SCRC/NBE4 as drafted is sound and the proposed change is not considered necessary or required to make the plan sound.	No action taken prior to submission
Policy SCRC/NBE5 Heritage and Conservation					
003	Mr Smith	English Heritage	Sound. Support this policy and its justification. There are a number of important heritage assets within or adjacent to that part of the City covered by this AAP. This includes the World Heritage Site at Saltaire. This section of the plan alerts users of the document to the presence of these assets, to the need for any proposals to have due regard to them, and to the requirement for any proposals to comply with the provisions of the overarching strategic policy for the historic environment that is set out in the Core Strategy.	Comment of support noted.	No action required
Policy SCRC/NBE6 Ensuring High Quality Design					

003	Mr Smith	English Heritage	<p>Sound. Subject to the amendment set out below, we support this Policy especially Criterion 7 relating to preserving and enhancing the setting and key views of important heritage assets.</p> <p>1. Criterion 7 Unsound. It would be helpful to users of the document if the AAP identified what were considered to be the key views of heritage assets to which this Criterion relates. The AAP should include a figure which identifies the key heritage assets which would be included under the provisions of this Criterion.</p> <p>2. Criterion 7 Unsound This Criterion would benefit from a slight rewording in order to improve its clarity Policy SCRC/NBE6, Criterion 7 amend to read:- “... <i>important heritage assets, especially those elements which contribute to the Outstanding Universal Value of Saltaire</i>”</p>	<p>1. The Council considers that Policy SCRC/NBE6 as drafted is sound and the proposed change is not in itself required to make the plan sound.</p> <p>Main heritage assets are identified on Figure 15 under policy SCRC/NBE5 and are identified in the sub area Development Frameworks. The Council do not consider that it would be appropriate to specify key views in the AAP as it is considered more appropriate for proposals to have regards to and be informed by the most up to date evidence identified in specific documents such as the World Heritage Site Management Plan and conservation area assessments.</p> <p>2. The Council considers that Policy SCRC/NBE6 as drafted is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may make the policy clearer and provide further detail.</p>	<p>1. No action taken prior to submission</p> <p>2. No action taken prior to submission</p>
017	Ms Lambert	Environment Agency	<p>Would like to see the inclusion of the natural environment into point 4, as follows ‘...enhances the quality of the built and natural environment...’</p>	<p>The Council considers that Policy SCRC/NBE6 as drafted is sound and the proposed change is not in itself required to make the plan sound. However, the proposed change could help to clarify that delivering a high quality public realm should enhance the natural as well as built environment.</p>	<p>No action taken prior to submission</p>
Promoting healthy, strong and inclusive communities living in and alongside the Corridor					
018	Miss Bust	The Coal Authority	<p>The AAP area has been subjected to limited coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.</p> <p>Within the AAP area there are 10 recorded mine entries, and three coal mining related hazards has been reported to The Coal Authority. In addition there are areas of recorded shallow coal workings and areas of unrecorded probable shallow coal workings exist in thick coal outcrops.</p> <p>Three recorded mine entries are located south of Shipley in a line from the A6038 to the B6149. There are also recorded and unrecorded shallow coal workings and six mine entries along the Bolton Hall Road corridor. A further mine entry is located in the Bolton Woods area north of Drovers Way.</p> <p>Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not always a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p>	<p>Noted. Ground issues associated with former mining and quarrying are considered in the Minerals and Waste Section of the AAP. The AAP sets out that within areas affected by mining hazards, development proposals will need to afford due consideration to the potential presence of unstable land and proposals should be accompanied by a Mining Risk Assessment, or equivalent. This requirement is set out in the relevant site allocation proposal statements</p>	<p>No action taken prior to submission</p>
Policy SCRC/HSC2 Open space, sport and recreation					

007	Ms Ledger	Sport England	<p>1. Welcome point 1 of this policy that reflects parent policy in the core strategy and the NPPF para 74.</p> <p>Part B however would indicate that just because the recreational open space has fallen out of use, it is assumed this is no longer required. In Sport England's experience often this is because the landowner has decided to shut down access rather than indicating a lack of demand. This policy should be led by research and evidence on sport and recreation rather than assumptions.</p> <p>2. Para 4.8.38. We strongly welcome this specific wording and reference to our own policy, the playing pitch strategy and the support of the sports governing body.</p>	<p>1. The intention of the policy is that any loss of any land formerly used as recreation open space will be mitigated through the provision of new and enhanced areas of open space within the Bolton Woods Quarry and New Bolton Woods sites.</p> <p>It is considered that the policy has been informed by robust evidence in the Green Infrastructure (GI) Study and Playing Pitch Strategy. The GI study identified that in order to accommodate high levels of development in the Corridor some existing GI may be lost. However, the GI study identifies that that is potential within the SCRC to create new high quality GI assets to mitigate any losses through new development. Sites including New Bolton Woods (NBW1) and Bolton Woods quarry (BWQ) have been identified under Policy SCRC/NBE1 as key sites for delivering new green space within development.</p> <p>2. Comment noted.</p>	No action taken prior to submission
Implementation and Delivery					
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	Paras 5.13 and 5.14- these paragraphs state the NPPF guidance requires careful attention being given to viability and delivery in the plan making and that there are a number of potential funding and delivery mechanisms and opportunities that the LPA will utilise to ensure delivery of the AAP. My clients request further details on this aspect and discussion in due course.	Comment noted.	No action taken
014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	Table 4 page 133 – AAP sites delivery – BWQ1's timescale is stated as 2015 - 2030 with anticipated development between 2015-20, 2020-25 and 2025-30. Such phasing is logical and supported by my clients. The anticipated dwelling capacity should however be revised to 700 dwellings given site characteristics	<p>Comment noted. The proposed allocation differs from the submitted redline boundary as part of the planning application process. The Council therefore consider the expected development as set out in the AAP is achievable and reflects a realistic and deliverable approach to providing new homes within the area.</p> <p>The site allocation statements set out expected development based on available evidence, however it is recognised that these figures may be subject to change following detailed site proposals. However a key aim of the AAP is to maximise the delivery of housing on suitable sites as set out in the Policy SCRC/H2. The proposed change is therefore not considered required to ensure the Plan is sound.</p> <p>The Council will monitor the AAP in regards to housing delivery on identified sites and review the AAP if necessary.</p>	No action taken prior to submission
Monitoring					
007	Ms Ledger	Sport	Recommend the implementation and delivery of the playing pitch strategy	Noted. The Council considers that Plan as drafted is	No action taken prior to submission

		England	would be a useful indicator for IND9(EV) and IND8(EV) under Environment	sound and the proposed change is not in itself required to make the plan sound. However, the proposed change may help strengthen the monitoring framework.	
Supporting Documents					
007	Ms Ledger	Sport England	<u>Evidence base – omission (as shown on the web page)</u> The evidence material listed should include the recently adopted playing pitch strategy (2014) which sets out the supply and demand for pitch sports across the district. This recent study identifies significant shortfalls across the district that should be addressed through strategic planning, and site specific policies such as the AAP. This omission is not reflected by the reference at para 4.8.29 explicitly to the playing pitch strategy, which is very much welcomed.	The Playing Pitch Strategy forms part of the AAP evidence base and is available on the council's website. The council intend to publish and make available the Playing Pitch Strategy as part of the submission documents for the AAP.	Playing pitch strategy to be included in submission evidence base
Sustainability Appraisal					
003	Mr Smith	English Heritage	Appendix F, spreadsheet on page F4, Site BWQ1: Bolton Woods Quarry. There are two Grade II* Listed Buildings at the eastern corner of this area (Bolton Old Hall and Bolton Old Hall Cottage). The Assessment correctly identifies this site as being likely to potentially harm the significance of these buildings and therefore would harm SA Objective SA05. However, it puts forward no meaningful mitigation measures. In order to ensure that the significance of these buildings is not harmed through the development of this area, the SA should be recommending that the extent of the allocation should be amended to exclude the area between the curtilages of these Listed Buildings and Brockwater Drive.	Noted. The Sustainability Appraisal (SA) Report identifies potential harm to the listed buildings and consequently SA objective SA05. The SA report identifies that the site allocation statement for BWQ1 should include the following "Development should ensure elements which contribute to the character or setting of Grade II* Listed Bolton Old Hall and Bolton Old Hall Cottage are preserved." Also the SA Report notes on page 62 Policy SCRC/NBE5 will provide appropriate mitigation by expecting development to preserve and enhance the character, appearance and setting of key heritage assets within and adjacent the AAP. The listed buildings are highlighted as key heritage assets in the site allocation statement and paragraph 3.35 of the Centre Section Strategic Development Framework. The Council therefore considers the AAP is based on robust evidence which and includes appropriate mitigation against potential negative impacts identified in the SA Report.	No action taken prior to submission
0013	Mr Robison	Local Resident	The sustainability report seems to be pretty insubstantial	Noted. The Council considers the AAP has been based on robust evidence including a full Sustainability Appraisal, which has been prepared alongside the AAP, in accordance with the Local Planning and SEA Regulations.	No action taken prior to submission
HRA Screening for the Shipley and Canal Road Corridor AAP					
005	Mr Hall	Natural England	Natural England welcomes the conclusions and recommendations of the screening report. Natural England advises that there is a need to reflect the proposed modifications to text of Policy SC8 as it has been modified. Also support the recommended strengthening of the policies as set out in section 5.2.	Noted. The HRA will be updated for Submission and proposed modifications incorporated.	HRA Updated prior to submission
Transport Study					

004	T. Rios	Highways England	Paragraph 4.5.6 refers to the Transport Study completed by consultants in 2015. The Study focuses on identifying measures to mitigate the local transport impacts resulting from proposed growth in the Shipley and Canal Road Corridor but does not address any issues of linkage with areas beyond the AAP area and Bradford city centre. This approach is reflected in Policy SCRC/SRT1 Transport Improvements.	The council do not consider the role of the Transport Study to address issues beyond the AAP boundary and city centre. This has been considered in detail through the District Wide Transport Study in support of the Core Strategy.	No action taken prior to submission
Strategic Flood Risk Assessment					
017	Ms Lambert	Environment Agency	As a result of the Boxing Day 2015 floods, a number of properties in Bradford were affected which have not previously flooded. It is imperative that the flood outline for this event is considered for the proposed sites put forward in this document. Appropriate mitigation measures should be proposed on the site assessment forms and will need to be included in any future flood risk assessments submitted. It may also be appropriate to consider incorporating this latest flood event in the Level 1 and Level 2 SFRA's.	All proposed allocations have been informed by an update to date Strategic Flood Risk Assessment Level (SFRA) 2. The latest available data has been used to inform the SFRA Level 2 for the AAP. The Bradford Beck Model is considered up to date and the most robust and sound evidence available.	No action taken prior to submission
Policies Map					
007	Ms Ledger	Sport England	When comparing the playing fields notation with recent 2011 photographs from Google Earth this would suggest that the playing fields could extend further northwards than shown on this map. Goal posts and pitch markings are shown west of the full length of Powell Road and the southern end of Poplar Crescent. It would be worth reviewing this to ensure the notation is accurate.	Noted. The land-use designations on are shown on the Policies Map. This notation has been carried forward from the RUDP 2005 with no proposed changes. However, the proposed change may improve the accuracy of the notation in this location.	No action taken prior to submission
General					
007	Ms Ledger	Sport England	<u>Para – 2.16</u> We have previously made representations on the AAPs approach and impact on the Bolton Woods area, in particular the Gaisby Lane & King George Paying Fields site which includes playing fields containing a number of football pitches and a cricket pitch alongside ancillary changing accommodation. Similarly we have an outstanding statutory objection lodged against the 2014 masterplan application (ref: 14/04818/MAF) for this site as the proposals would result in a loss of playing fields without adequate replacement or compensation contrary to para 74 in the NPPF and the findings of the playing pitch strategy. It is arguable that the application is premature and prejudicial given the emerging status of the AAP.	This comment relates to an individual planning application and is therefore not considered directly relevant to the tests of soundness or AAP. Weight can be given to the emerging AAP which is a material consideration in regards to determination of the relevant planning application as set out in the policy response to 14/04818/MAF.	No action required
013	Mr Robison	Local Resident	The wording of this consultation and the requirements of this form would put anybody off whose full-time job it wasn't to read and understand such things. The process seems completely opaque, most residents know nothing about it (I only found out about it by chance)	The AAP has been consulted on in accordance with the Local Planning Regulations 2012. This has included informal consultation on the BDP Strategic Development Framework and formal consultation on the SCRC AAP Issues and Options Report in 2013 and the AAP Publication Draft in 2015/2016. Full details of the consultation and methods used are set out in the relevant statements of consultation. The online comment form has been designed to ensure comments address issues relating to the soundness or legal compliance of the plan. A guidance note was also prepared and made available as part of the Publication Draft consultation to provide further advice and detail on how to submit representations.	Full submission statement of consultation included in AAP submission documents

014	Mr Bath	Iain Bath Planning on behalf of The Marshall Group	<p>1. The following points are noted and supported –</p> <ul style="list-style-type: none"> • The AAP is part of the local plan for Bradford • The AAP will guide the transformation of the corridor area • The AAP will provide the policy framework to assist in the decisions on planning applications • The AAP will influence decisions about transport, housing, infrastructure, community facilities, economic and future investment • The corridor area is a priority regeneration growth area with a vision, strategic objectives, development proposals and policies. <p>2. Context. The following points are noted –</p> <ul style="list-style-type: none"> - My clients have been in collaborative discussions with key parties and emphasise the need for this to continue and be increasingly active - My clients submitted an outline planning application for the redevelopment of the quarry site for residential development in November 2015 and the application is currently progressing - The corridor area is a key growth area within the core strategy, has significant regeneration potential and the AAP's regeneration objectives are consistent with the core strategy <p>3. My clients are predominantly supportive of the content of the AAP and the allocation of the BWQ site for residential development. Certain small revisions to the plan are requested as set out by these representations.</p>	<p>1. Comment of support noted.</p> <p>2. Noted</p> <p>3. Comment of support noted.</p>	No action required
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Department of Regeneration
Development Plans
2nd Floor (South) Jacobs Well
Nelson Street
Bradford
BD1 5RW

Tel: (01274) 433679

Email: planning.policy@bradford.gov.uk

Date: Monday 14th December 2015

Dear Sir / Madam,

RE: LOCAL PLAN FOR THE BRADFORD DISTRICT

- **Waste Management Development Plan Document**
 - **Bradford City Centre Area Action Plan**
 - **Shipley and Canal Road Corridor Area Action Plan**
- PUBLICATION DRAFT (REGULATION 18 & 19)**

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

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

Aim of this consultation

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

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

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

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

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

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

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

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

Availability of Documents

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

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

Development Plan Documents

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

Supporting Documents

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

Deposit Locations

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

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

Waste Management Development Plan Document (Publication Draft)

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

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

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

Shipley and Canal Road Corridor Area Action Plan: Publication Draft Consultation
(December 2015 – February 2016)

to 7pm

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

Yours faithfully,

A handwritten signature in black ink, appearing to read 'A Marshall'.

Andrew Marshall
Planning & Transport Strategy Manager

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

Appendix 3 - Summary of mains issues raised through representations

Vision
<ul style="list-style-type: none"> • General support for AAP vision
Strategic objectives
<ul style="list-style-type: none"> • General support for AAP strategic objectives • Proposed amendment to Strategic Objective 11 sought to ensure the objective more closely reflects national policy guidance in regards to avoiding harm to designated heritage assets.
Shipley sub area Development framework:
<ul style="list-style-type: none"> • General support for Shipley sub area vision • Proposed amendment to sub area vision to include a reference to the Saltaire World Heritage Site in line with the overall AAP vision. • Comment questioning the status of proposals and requirements in supporting text to the sub area Vision. Requirements intended to assist decision making in regards to a development proposal should be incorporated into a specific spatial policy for Shipley. Such a policy for would help to ensure that the Vision for this part of Bradford is realised.
Shipley sub area proposed site allocations
<ul style="list-style-type: none"> • Comment that the site allocations in this section are not tied into any Local Plan Policy. To ensure that the constraints and development requirements are effective, site allocations need to be specifically referred to within a policy in the AAP.
<ul style="list-style-type: none"> • Welcome the site proposals that reflect the recommendations of the Heritage Assessment as set out in site allocation statement's for sites STC1, STC3, DF1, DF2, DF4/5, DF6, SE1 • Welcome site proposals for sites ST6, DF7 subject to the proposed additional text being included in the site proposal statement to reflect the recommendations of the Heritage Assessment
<ul style="list-style-type: none"> • Site allocations DF2, DF3 and DF6 should include the need for archaeological evaluation in regards to archaeological features.
<ul style="list-style-type: none"> • Welcome and support that sites DF3 and SE1 specify that the line of the Bradford Canal should be protected. Such an approach is consistent with NPPF paragraph 114 and will help conserve an important heritage asset in line with NPPF paragraph 126
<ul style="list-style-type: none"> • STC3- support the reference to the need to upgrade Station Road to adoptable status
<ul style="list-style-type: none"> • DF3- The text relating to the retention of the old Windhill Station should be deleted as the building is not listed or within the setting of a listed building. There is therefore no justification for the retention of this building. This particular proposal is neither effective nor deliverable and is therefore not in compliance with national policy.
<ul style="list-style-type: none"> • DF4- Parts of the site are identified as being within flood zone 3b. Development is not appropriate in zone 3b. This should be made much clearer in the AAP. The Environment Agency will object in principle to any development proposals for less, more or highly vulnerable uses in flood zone 3b.

<p>SE1 Shipley East</p> <ul style="list-style-type: none"> • Support for the provision of additional car parking for the railway station. The opportunity to re-open the subway links through the station will require careful consideration of operational railway requirements in terms of security and maintenance if this is to be delivered. • Site SE1 contains high biodiversity, including a rare species of butterfly. Question how regeneration can be achieved in a way that minimises adverse impacts on biodiversity. There is conflict between delivering development, proposed green infrastructure and Policy SCRC/NBE4 – Biodiversity and Ecology. An area of the site needs to be cordoned off before development, to be conserved for the high number of species and left to be managed later. The AAP should include the requirement that no development should take place between March and August to protect nesting birds. • The site schedule for SE1 does not specify the site is affected by mining legacy despite what AAP paragraph 4.4.51 states. This should be included to aid the recognition of constraints to potential developers. • Parts of SE1 are identified as being within flood zone 3b. Development is not appropriate in zone 3b. This should be made much clearer in the AAP. The EA will object in principle to any development proposals for less, more or highly vulnerable uses in flood zone 3b. • Welcome the expectation for developers to provide significant improvements to green infrastructure. • Bradford Beck is currently achieving poor ecological status under the Water Framework Directive (WFD), and any proposals should ensure that the objectives of WFD are met and must not result in deterioration in the quality status.
<p>Centre Section sub area Development framework</p> <ul style="list-style-type: none"> • Comment questioning the status of proposals and requirements in supporting text to the sub area Vision. Requirements intended to assist decision making in regards to a development proposal should be incorporated into a specific spatial policy for the Centre Section. Such a policy for would help to ensure that the Vision for this part of Bradford is realised. • Welcome the reference to new and improved areas for sport in the central area. • General support for sub areas vision and proposals, in particular the identification of New Bolton Woods (NBW) and Bolton Woods Quarry (BWQ) as two areas of significant development potential and the need for sites within the centre section to be developed as part of the comprehensive regeneration of the area
<p>Centre Section proposed site allocations</p> <ul style="list-style-type: none"> • Comment that the site allocations in this section are not tied into any Local Plan Policy. To ensure that the constraints and development requirements are effective, these need to be specifically referred to within a policy in the AAP. • Welcome the heritage requirements specified for sites NBW1 and NBW6 • Site BWQ1 unsound. There are two Grade II* Listed Buildings at the eastern corner of this area (Bolton Old Hall and Bolton Old Hall Cottage). The undeveloped land is particularly important and provides an historic context and rural setting to the listed buildings. To ensure that the significance of these buildings is not harmed through the development of this area, the extent of the allocation should be amended to exclude the area between the curtilages of these Listed Buildings and Brockwater Drive. • Welcome the requirement that the redevelopment of the quarry will need to provide

for the prior extraction of any remaining stone reserves.
<p>NBW1 (New Bolton Woods)</p> <ul style="list-style-type: none"> • The proposed use for the site should specially acknowledge the sports facilities current and proposed • Open Space, Sport and Recreation: should acknowledge the wording of the NPPF para 74 although it is noted this is covered by policy SCRC/HSC2 • Welcome contributions to offsite playing fields, this should be sought in line with the needs identified in the Playing Pitch Strategy. • Welcome the acknowledgement that new changing facilities are required and crucially a cricket pavilion • Welcome that new sports facilities should include adequate long term management provision and community access • Welcome and support that site specifies that the line of the Bradford Canal should be protected. Such an approach is consistent with paragraph 114 and will help conserve an important heritage asset in line with NPPF paragraph 126 • Within the section on transport and movement the following addition text should be included:- “ the development should also take explicit account of the adjacent Bolton Woods Quarry masterplan proposals ‘and’ explicitly that provision for access to secure the delivery of the Bolton Woods Quarry site should be ensured” • Support for the aspirations of Green Infrastructure, Ecology, and Flood Risk for this site, which should bring multiple environmental benefits and help to achieve the objectives of WFD, and adaptation to climate change.
<ul style="list-style-type: none"> • NBW7- The site schedule does not specify that the site is affected by mining legacy despite what AAP paragraph 4.4.51 states. This should be included to aid the recognition of constraints to potential developer
<p>BWQ1- (Bolton Woods Quarry)</p> <ul style="list-style-type: none"> • Support for the site being allocated for residential development. The site is a key opportunity for delivering significant housing and environmental improvement. The site owners, are committed to bringing the site forward • Following assessment of the site as part of the outline planning application process the total number of dwellings achievable on site proposed is 700 dwellings. Request that the text be amended accordingly. • Request the following additional text be added– “access through the adjacent New Bolton Woods site to the south be made explicitly available to guarantee the deliverability of the Bolton Woods Quarry site” • Any obligations deriving from development should be subject to overall viability testing request the addition of text in the AAP to reflect this.
<p>City Centre Fringe sub area Development framework</p>
<ul style="list-style-type: none"> • Comment questioning the status of proposals and requirements in supporting text to the sub area vision. Requirements intended to assist decision making in regards to a development proposal should be incorporated into a specific spatial policy for the Centre Section. Such a policy for would help to ensure that the Vision for this part of Bradford is realised.
<p>City Centre Fringe proposed site allocations</p>
<ul style="list-style-type: none"> • Comment that the site allocations in this section are not tied into any Local Plan Policy. To ensure that the constraints and development requirements are effective, these need to be specifically referred to within a Policy in the AAP.
<p>Delivering a Wide Choice of High Quality Homes in the Corridor</p>

<p>SCRC/H1 Housing Requirement</p> <ul style="list-style-type: none"> • Support for major new housing development forming two new sustainable neighbourhoods within the centre section of the corridor area focused at New Bolton Wood and Bolton Woods Quarry
<p>SCRC/H2 Delivering new homes and sustainable neighbourhoods</p> <ul style="list-style-type: none"> • The density target of 40 dwellings per hectare should be applied flexibly given individual site characteristics, in particular topography around the Quarry site. • Welcome the intention to support the development of self and custom build, suggest that this could be explicitly linked to new legislation which comes into effect in April 2016 • Bradford Co Housing group are keen to support the policy ambitions in the AAP. The group's ambitions aims align with AAP and Urban Eco Settlements principle and the group are interested in sites in the AAP to deliver an eco friendly self-build co-housing scheme.
<p>Achieving Sustainable Economic Growth in the Corridor</p>
<p>Policy SCRC/SE7 Minerals Safeguarding-</p> <ul style="list-style-type: none"> • The policy sets out an appropriate planning framework for mineral safeguarding as required by Policy EN12 of the Core Strategy • The approach of the AAP is supported, and correctly identifies mining legacy for sites NBW1 and BWQ1. However, the site schedules for sites SE1 and NBW7 affected by mining legacy do not actually specify this despite what paragraph 4.4.51 states.
<p>Maximising Sustainable Transport Options and Connecting the Corridor</p> <ul style="list-style-type: none"> • The first step, before properties are built should be to substantially improve the transport infrastructure in this area. Canal Road should be dualled all the way from Shipley to Bradford before the commencement of any work. Secondly, it is vital that a Shipley Eastern Bypass is urgently moved forward • Significant new development is proposed in the AAP. Analysis shows that Sites NBW1 BWQ1 could increase traffic volume on the Strategic Road Network (SRN). In general, committed schemes should provide sufficient capacity on the SRN in and around Bradford to accommodate traffic generated by Local Plan development in West Yorkshire up to 2020. The phasing of sites and BWQ1 will need to take account of the timing capacity enhancement schemes. Where schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to additional schemes identified by the Highways England and included in the LIP or other appropriate schemes. • Comments made raising concern over air quality in the area and highlighting the importance of reducing air pollution levels in the area rather than increasing them. The plan discusses sustainable transport options and air quality but levels on Otley Road and Valley Road are already high. Any increase in traffic will have an adverse effect on these levels and consequently the health of the people i and could push air quality pollution beyond legal limits. The AAP acknowledges that the planned developments will increase traffic with the resulting impact on public health and on services. This is unacceptable and the council should be doing everything it can to reduce traffic levels and air pollution. The plan only focused on increasing active transport while not addressing the increase in vehicles and especially large, diesel vehicles. Object to the AAP on sustainability grounds.

<p>Policy SCRC/ST1: Transport Improvement</p> <ul style="list-style-type: none"> • Welcome the requirement for transport schemes ‘to take opportunities to enhance green infrastructure, biodiversity and habitat networks along the Corridor. This is in accordance with NPPF Paragraph 118. • The Canal and River Trust support proposals to improve access within Shipley and the canal. The canal and towpath is a key component of green infrastructure. Welcome that the policy will ensure that new development will be required to support the implementation of local transport improvements through design and access considerations and/or developer contributions. Such an approach is consistent with NPPF paragraph 114.
<p>Policy SCRC/ST5: Pedestrian and Cycle Movements</p> <ul style="list-style-type: none"> • The Canal and River Trust support the policy especially in relation to the Airedale Greenway which includes the Leeds & Liverpool Canal towpath. The Airedale Greenway is identified as a strategic cycle and walking route on the policies map. The policy approach is consistent with paragraph 114 of the NPPF
<p>Policy SCRC/ST8: Bradford Canal</p> <ul style="list-style-type: none"> • In a previous response to the AAP Issues and Options consultation the Canal and River Trust recommended a policy that safeguards the route of the Bradford Canal is included within the AAP. It is therefore noted Policy SCRC/ST8 specifies that an alignment for the proposed re-introduction of the Bradford Canal will be protected to enable its future provision. Furthermore Figure 12 identifies the safeguarded route, and several proposed development sites along the safeguarded route will accommodate future aspirations to reinstate the Bradford Canal. Support this approach and note that it is consistent with paragraph 114 of the National Planning Policy framework (NPPF) and will also help to conserve an important heritage asset in line with NPPF paragraph 126.
<p>Mitigating and adapting to climate change along the Corridor</p>
<p>Policy SCRC/CC1: Flood Risk and Water Management</p> <ul style="list-style-type: none"> • The Environment Agency support this policy and note it may be appropriate to consider the impact from the latest flood event in the Level 2 SFRA.
<p>Policy SCRC/CC2: Sustainable Design and Construction</p> <ul style="list-style-type: none"> • Bradford Co Housing’s ambition to build to high ecological standards would support policy SCRC/CC2 on sustainable design and construction.
<p>Protecting and Enhancing the Natural and Built Environment of the Corridor</p>
<p>Policy SCRC/NBE1: Green Infrastructure</p> <ul style="list-style-type: none"> • Comments welcoming and supporting the proposed policy on green infrastructure. • The Green infrastructure framework shown in Figure 13 shows multi-functionality but is a complicated structure and may be difficult to deliver. • Comment that the Bolton Woods Quarry site has been incorrectly referenced in relation to the Green Infrastructure Framework and requesting further clarification on this matter.
<p>Policy SCRC/NBE2 Waterway Environments</p> <ul style="list-style-type: none"> • Support this Policy especially those elements which relate to the conservation and enhancement of the character and setting of the waterways • prefer to see the inclusion of a direct Water Framework Directive reference, however the objectives of WFD are implicit within the type of improvements listed.
<p>Policy SCRC/NBE3: The Bradford Beck</p> <ul style="list-style-type: none"> • Comments welcoming and supporting the proposed policy. The approach is

<p>considered to be in accordance with NPPF Paragraph 118.</p> <ul style="list-style-type: none"> • The Environment Agency support maximising opportunities to re-naturalise the watercourse as opening up existing culverts bring not only huge benefits to wildlife, but can also help to manage flood risk.
<p>Policy SCRC/NBE4 Biodiversity and Ecology</p> <ul style="list-style-type: none"> • Comments welcoming and supporting the proposed policy subject to minor changes. • Paragraph 4.7.33 needs to be updated to reflect modified Core Strategy policy SC8 and the descriptions of the zones related to the Special Protection Area (SPA). This section of the plan expected to make more explicit reference to recommendations in Habitats Regulation Assessment (HRA). • Comment supporting the proposals for Shipley Station are to safeguard (and mitigate) any adverse impacts on Shipley Butterfly Garden. This wildlife site should be renamed in the AAP to Shipley Butterfly Meadow to more accurately reflect its use. • Pleased to see the council have taken seriously the importance of conserving for butterflies (Nectar Highway and Butterfly Express Table 3), informed by the Ecological Assessment. Both the environmental section and the Shipley Canal Road Corridor Ecological Assessment from West Yorkshire Ecology are excellent. However question soundness relating to implementation. • Clarity sought in relation to the Habitat highways (Table 3 page 117) and text relating to the Bolton woods Quarry site
<p>Policy SCRC/NBE5 Heritage and Conservation</p> <ul style="list-style-type: none"> • Comment of support from English Heritage for this policy and its justification.
<p>Policy SCRC/NBE6 Ensuring High Quality Design</p> <ul style="list-style-type: none"> • Comments supporting the policy subject to minor amendments. • It would be helpful if the AAP identified what were considered to be the key views of heritage assets. The AAP should therefore include a figure which identifies the key heritage assets, which would be included under the provisions of this policy (Criteria 7). • Criterion 7 would benefit from a slight rewording to improve its clarity. • Comment seeking the inclusion of the natural environment into Criteria 4 of the policy
<p>Promoting healthy, strong and inclusive communities living in and alongside the Corridor</p> <ul style="list-style-type: none"> • Noted that within the AAP area there are 10 recorded mine entries, and three coal mining related hazards reported to The Coal Authority. In addition there are areas of recorded shallow coal workings and areas of unrecorded probable shallow coal workings exist in thick coal outcrops. However it is important to note that land instability and mining legacy is not always a complete constraint on new development
<p>Policy SCRC/HSC2 Open space, sport and recreation-</p> <ul style="list-style-type: none"> • Comment welcoming Criteria 1 of this policy that reflects the core strategy policy and the NPPF para 74. • Comment strongly welcoming the specific wording in paragraph 4.8.38 of the AAP and reference to Sport England's Playing Pitch policy, the playing pitch strategy and the support of the sports governing body.
<p>Implementation and Delivery</p> <ul style="list-style-type: none"> • Table 4 (AAP sites delivery)– BWQ1's timescale and phasing is logical and supported. However the anticipated dwelling capacity should be revised to 700 dwellings given site characteristics
<p>Monitoring</p>

<ul style="list-style-type: none"> • Comment recommending the implementation and delivery of the playing pitch strategy would be a useful indicator for IND9(EV) and IND8(EV) under Environment.
Supporting Documents
Sustainability Appraisal <ul style="list-style-type: none"> • Appendix F for site BWQ1. Noted that There are two Grade II* Listed Buildings at the eastern corner of this area. The Assessment correctly identifies this site as being likely to potentially harm the significance of these buildings and therefore would harm SA Objective SA05. However, it puts forward no meaningful mitigation measures. To ensure that the significance of these buildings is not harmed, the SA should be recommending that the extent of the allocation should be amended to exclude the area between the curtilages of these Listed Buildings and Brockwater Drive. • Comment that the sustainability report seems to be pretty insubstantial
HRA Screening <ul style="list-style-type: none"> • Natural England welcomes the conclusions and recommendations of the screening report. • There is a need to reflect the proposed modifications to text of Core Strategy Policy SC8. • Support the recommended strengthening of the policies as set out in section 5.2.
The Transport Study <ul style="list-style-type: none"> • The Study focuses on identifying measures to mitigate the local transport impacts resulting from proposed growth in the Shipley and Canal Road Corridor but does not address any issues of linkage with areas beyond the AAP area and Bradford city centre
Strategic Flood Risk Assessment <ul style="list-style-type: none"> • It may be appropriate to consider incorporating the latest flood event in the Level 1 and Level 2 SFRA's.
Evidence base <ul style="list-style-type: none"> • The evidence material listed should include the recently adopted playing pitch strategy (2014) which sets out the supply and demand for pitch sports across the district. This omission is not reflected by the reference at para 4.8.29 explicitly to the playing pitch strategy, which is very much welcomed.
Policies Map <ul style="list-style-type: none"> • Comparing the playing fields notation with recent 2011 photographs from Google Earth would suggest that the playing fields could extend further northwards than shown on this map. It would be worth reviewing this to ensure the notation is accurate.
General comment s <ul style="list-style-type: none"> • The wording of this consultation and the requirements of the online form would put anybody off whose full-time job it wasn't to read and understand such things. The process seems completely opaque, most residents know nothing about it. • Consultation has been difficult to engage with.

- An outline planning application for the redevelopment of the quarry site (BQW1) for residential development was submitted in November 2015 and the application is currently progressing.
- The corridor area is a key growth area within the core strategy, has significant regeneration potential and the AAP's regeneration objectives are consistent with the core strategy