

Development Plans ,
 City of Bradford Metropolitan District Council
 2nd Floor South,
 Jacobs Well,
 Nelson Street
 Bradford BD1 5RW

Our Ref: [REDACTED]
 Your Ref:

Telephone: [REDACTED]
 Mobile:

29 January 2016

Dear Sirs,

The Local Plan for the Bradford District – Shipley and Canal Road Corridor Area Action Plan: Publication Draft

Thank you for consulting Historic England about the Publication Draft of the Shipley and Canal Road Corridor Area Action Plan. We have the following comments to make about the document:-

Page	Section	Sound/ Unsound	Comments	Suggested Change
18	The Vision	Sound	<p>We support the proposed Vision for the Shipley and Canal Road Corridor, especially those aspects which relate to:-</p> <ul style="list-style-type: none"> • Improving the links between Shipley and Saltaire, Shipley Station and the Leeds and Liverpool Canal. • Improving the area as a key gateway to the World Heritage Site • The redevelopment of the area enhancing the World Heritage Site and other heritage and environmental assets in its vicinity • Creating a better offer for workers, visitors and residents alike. <p>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</p>	-

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			tourist areas nor does it present a very favourable image of this part of the District.	
19	Strategic Objective 6	Sound	<p>We support the intention to enhance Shipley and improve links between the town centre, Saltaire, Shipley Station and the Leeds Liverpool Canal.</p> <p>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.</p>	
19	Strategic Objective 11	Sound	<p>Subject to the amendment set out below, we support this Objective.</p> <p>There are a number of designated heritage assets within the area covered by this Area Action Plan</p> <ul style="list-style-type: none"> • It lies in close proximity to the World Heritage Site and, indeed, the northern part of the Area Action Plan (around Shipley) lies within the Buffer Zone for Saltaire. • The Canal Road Corridor has Conservation Areas at its northern end (The Leeds Liverpool Canal Conservation Area), southern end (The City Centre Conservation Area), and also along part of its western boundary (St Paul Conservation Area). • There are two Registered Historic Parks and Gardens in its vicinity. • There are a number of Listed Buildings both within and adjacent to its boundary. <p>Consequently, it is important that the strategy for this area ensures that these</p>	

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			assets are appropriately conserved.	
19	Strategic Objective 11, line 4	Unsound	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.	Strategic Objective 11, line 4 amend to read:- <i>“... avoid harm to and take account of ...”</i>
22	ShIPLEY Vision	Sound	Subject to the amendment set out below, we support the Vision for ShIPLEY especially the intention that by 2030:- <ul style="list-style-type: none"> • New and refurbished buildings alongside high-quality public realm will reconnecting the town with its quality built heritage. • New and improved pedestrian and cycle routes will provide better linkages between the town centre, ShIPLEY Station, Saltaire and the Leeds and Liverpool Canal • The Dockfield Road area will have become a vibrant and attractive residential and business location around the waterside setting of the Leeds and Liverpool Canal and the River Aire. 	
22	ShIPLEY Vision	Unsound	Given that one of the intentions of the overarching Vision doe the AAP is to improve one of the gateways into Saltaire, the Vision for ShIPLEY ought to make reference to the World Heritage Site.	ShIPLEY Vision first Paragraph add the following to the end:- <i>“It will provide an attractive gateway for those visiting the World Heritage Site”</i>
23	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.	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

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			<p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decision-maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for Shipley</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	<p>account.</p> <p>This Policy should be based upon the supporting text for the Vision set out on pages 23 and 24.</p>
26 to 42	Shipley Allocations	Unsound	<p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p>	<p>Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i></p>
26	STC1: Shipley Indoor Market Hall	Sound	<p>This site lies within the Buffer Zone of the World Heritage Site at Saltaire.</p> <p>Therefore, we welcome the Site Proposals that any redevelopment of this area should:-</p> <ul style="list-style-type: none"> • respond sensitively to its setting in the World Heritage Site buffer zone, and • provide an improved gateway to the town centre for those arriving from 	-

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			<p>Saltaire or the Leeds and Liverpool Canal</p> <p>This reflects the recommendations of the Heritage Assessment.</p>	
27	STC2: Market Square	Sound	<p>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.</p> <p>Therefore, we welcome the Site Proposals that any redevelopment of this area should:-</p> <ul style="list-style-type: none"> • Safeguard the character and setting of the Grade II building • Be of high-quality design to reconnect the town centre with its quality-built heritage and enhance the setting of Saltaire <p>The second bullet-point reflects the recommendations of the Heritage Assessment.</p>	-
31	STC6: Buildings along Briggate	Sound	<p>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.</p> <p>Therefore, subject to the change set out below, we welcome the Site Proposals that any redevelopment of this area should take opportunities to provide an improved gateway to Shipley and Saltaire and enhance the setting of the Leeds Liverpool Canal Conservation Area</p> <p>This reflects one of the recommendations of the Heritage Assessment.</p>	-

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31	STC6: Buildings along Briggate	Unsound	<p>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></p> <p>This should also be included in the Site Proposals.</p>	<p>STC6: Site Proposals add the following additional bullet-point:- <i>“provide high quality architectural design to safeguard and enhance the setting of the World Heritage Site”</i></p>
32	DF1: Dock Lane, Canalside	Sound	<p>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.</p> <p>Therefore, we welcome the Site Proposals that any redevelopment of this area should:-</p> <ul style="list-style-type: none"> • provide new and improved pedestrian and cycle links along the Leeds and Liverpool Canal • safeguard and enhance the setting of the Leeds and Liverpool Conservation Area, including providing a high-quality frontage to the canal and open space and access to the canalside for residents <p>These reflect the recommendations of the Heritage Assessment.</p>	-
33	DF2: Junction Bridge, Briggate	Sound	<p>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.</p> <p>Therefore, we welcome the Site Proposals that any redevelopment of this</p>	-

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			<p>area should:-</p> <ul style="list-style-type: none"> • safeguard and enhance the setting of Leeds and Liverpool Canal conservation area and the key heritage assets including, the Grade II Listed Junction Bridge and the key unlisted building Junction House • create positive frontages to the canal including the canal basin area and consider the elevation to the railway, which passes by at an elevated level <p>These reflect the recommendations of the Heritage Assessment.</p>	
34	DF3 Land between Leeds Road and Dock Lane	Sound	<p>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.</p> <p>Therefore, we welcome the Site Proposals that any redevelopment of this area should:-</p> <ul style="list-style-type: none"> • provide a strong frontage to Leeds Road to create an enhanced gateway to Shipley and the World Heritage Site of Saltaire. • safeguard and enhance the setting of Leeds and Liverpool Canal Conservation Area and key unlisted buildings, including the former Shipley and Windhill Railway Station and Pumping Station, which should be retained and integrated into any proposed redevelopment of the site <p>These reflect the recommendations of the Heritage Assessment.</p>	-
35	DF5: Dockfield Road South	Sound	<p>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.</p>	-

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			<p>Therefore, we welcome the Site Proposals that any redevelopment of this area should safeguard and enhance the setting of the Leeds Liverpool Canal Conservation Area and provide a high-quality frontage to the canal.</p> <p>These reflect the recommendations of the Heritage Assessment.</p>	
37	DF6: Regent House	Sound	<p>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.</p> <p>Therefore, we welcome the Site Proposals that any redevelopment of this area should safeguard and enhance the setting of the Leeds and Liverpool Conservation Area and key heritage assets including the Grade II Listed Junction Bridge and the unlisted mill buildings and provide a high-quality frontage to the canal</p> <p>These reflect the recommendations of the Heritage Assessment.</p>	
38	DF7: Junction of Dock Lane and Dockfield Road	Unsound	<p>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.</p> <p>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>”</p> <p>In case the current planning permission is not built, the recommendations of the</p>	<p>Add to the end of the Site proposal:- <i>“... residential development. Any proposals will be expected to:-</i></p> <ul style="list-style-type: none"> • <i>safeguard and enhance the setting of the Leeds Liverpool Canal Conservation Area”</i>

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			Heritage Assessment should also be included in the Site Proposals.	
40	SE1: Shipley East	Sound	<p>The site also lies within the Buffer Zone of the World Heritage Site at Saltaire.</p> <p>Therefore, we welcome the Site Proposals that any redevelopment of this area should provide:-</p> <ul style="list-style-type: none"> • a strong sense of place and that the design process should be informed by the preparation of a Masterplan/urban design framework • an enhanced built form and public realm with a strong frontage to Leeds Road to create an enhanced gateway to Shipley and the World Heritage Site of Saltaire • a high-quality architectural and sustainable design to safeguard and enhance the setting of the Saltaire World Heritage Site. <p>These reflect the recommendations of the Heritage Assessment.</p>	-
43	The Centre Section Vision supporting text	Unsound	<p>This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p>	<p>Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account.</p> <p>This Policy should be based upon the supporting text for the Vision set out on page 44.</p>

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			<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 Centre Section</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	
46 to 57	The Centre Section Allocations	Unsound	<p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to within one of the Policies within the plan.</p>	<p>Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i></p>
46	NBW1: New Bolton Woods	Sound	<p>This site lies on the opposite side of the valley to the Grade II Registered Historic Park and Garden at Lister Park. Therefore we welcome the requirement that proposals should have regard to the potential impact upon any important views from this registered park</p>	
53	NBW6: North Queens Road	Sound	<p>This site adjoins the boundary of the St Paul Conservation Area. Therefore we welcome the requirement that proposals should safeguard and, where possible, enhance that area.</p>	-
55	BWQ1: Bolton Woods Quarry	Unsound	<p>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</p>	<p>Amend the extent of Site BWQ1 to exclude the area between the curtilages of Bolton Old Hall and Bolton Old Hall Cottage and</p>

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			<p>No. 15/06249/MAO).</p> <p>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.</p> <p>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 contributes 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.</p>	Brockwater Drive.
56	BWQ1: Bolton Woods Quarry, 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	-

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			reserves.	
59	City Centre Fringe Vision supporting text	Unsound	<p>This Section includes a specific Vision of how this area will look and function in 2030. The supporting text then sets out a number of proposals and design requirements which, presumably, are intended not only assist in the delivery of the Vision but also are matters which those proposing development within this part of the City would need to take into account.</p> <p>However, it is unclear what status these requirements are meant to have. Although some elements are incorporated (in a more generic form) within some of the Policies in Section Three, the vast majority of the more detailed spatial aspects are not.</p> <p>The requirements set out in this section seem intended to assist the decision-maker determine how they should react to a development proposal. If this is the case, then they should be incorporated into a specific spatial policy for The Centre Section</p> <p>Such a Policy for would help to ensure that the Vision for this part of Bradford is realised.</p>	<p>Add an additional Policy to this Section of the Plan which sets out the detailed spatial considerations which those proposing development in this part of the City would need to take into account.</p> <p>This Policy should be based upon the supporting text for the Vision set out on page 59.</p>
61 to 63	City Centre Fringe Allocations	Unsound	<p>The Allocations in this Section set out a number of detailed development requirements which those proposing development would be expected to take into account. However, these are not tied into any Local Plan Policy.</p> <p>In order to ensure that the constraints and development requirements are securely and effectively tied into the AAP, these need to be specifically referred to</p>	<p>Add to the end of the above Policy:- <i>“Development proposals will be expected to accord with the development principles that are set out in each of the Site Allocations”</i></p>

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			within one of the Policies within the plan.	
106	Policy SCRC/NBE2	Sound	<p>We support this Policy especially those elements which relate to the conservation and enhancement of the character and setting of the waterways and to the requirement that proposals should positively relate to and take advantage of their proximity to these waterways.</p> <p>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.</p>	-
111	Policy SCRC/NBE5	Sound	<p>We 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.</p> <p>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.</p>	-
113	Policy SCRC/NBE6	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.	-
113	Policy SCRC/NBE6, 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	The AAP should include a figure which identifies the

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			heritage assets to which this Criterion relates .	key heritage assets which would be included under the provisions of this Criterion.
113	Policy SCRC/NBE6, 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>

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

Yours faithfully,


Historic Environment Planning Adviser (Yorkshire)
e-mail: 