

IAIN BATH PLANNING

Bradford District Local Plan
City of Bradford MDC
Development Plans Team
2nd Floor South
Jacobs Well
Manchester Road
Bradford
BD1 5RW

8TH February 2016

Email – planning.policy@bradford.gov.uk

Dear Sirs ,

Re:- Shipley and Canal Road Corridor Area Action Plan Publication Draft December 2015 – February 2016

I write on behalf of my clients ; The Marshall Group , in relation to the above document which contains various references to their landholding at Bolton Woods Quarry , Bradford . These representations follow earlier submissions to the Bradford LDF Core Strategy , the Bradford Shipley Regeneration Corridor Strategic Development Framework and the Shipley and Canal Road Corridor Area Action Plan : Issues and Options document.

My clients would like to make the following comments as part of this formal public consultation process on the Publication Draft AAP.

1 GENERAL

The following points are noted and supported –

- 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 decisions on planning applications
- The AAP will also influence decisions about transport, housing, infrastructure, community facilities, economic development and future investment
- The corridor area is a priority regeneration growth area with a vision , strategic objectives , development proposals and policies.

2 CONTEXT

The following points are noted –

- 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

3 KEY OBJECTIVES

The following points are noted and supported

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- There is a need for a comprehensive and upto date planning framework for the AAP area
- There is a need for a clear vision , strategy and framework

4 BACKGROUND

The following points are noted and supported –

- The corridor area represents a strategic location for new development
- Development within the area will make a 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 Woods Quarry

My clients would like to clarify the following reference however -

‘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 ‘

5 SPECIFIC COMMENTS

The following points are noted and supported –

- 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
- Figure 4 – the defined boundary of the corridor includes Bolton Woods Quarry
- Vision strategy objectives – 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
- 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)
- Bolton Woods Quarry (BWQ)
- It is acknowledged that a collaborative approach has been established between the LPA and owners and the quarry intention is to cease operations and restate the site in a manner 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
- Para 3.36 – development in the centre section to include circa 2,398 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

6 PROPOSED SITE ALLOCATIONS

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The following comments are made –

A New Bolton Woods

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 site 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.

- 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 '

B Bolton Woods Quarry

The following points are noted and supported –

- 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

Within the site proposals section the estimated capacity of the site is stated as 1000 dwellings .In reality following assessment of the site as part of the planning application process the total number of dwellings achievable on the site is 700 dwellings .My clients request that the text be amended accordingly.

My clients note 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 '

My clients would also like to emphasise that any obligations deriving out of a development scheme on the 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 .

7 POLICY FRAMEWORK

The following points are noted , supported and commented upon –

-policy scrc/h1 – major new housing development forming 2 new sustainable neighbourhoods within the centre section of the corridor area will be focused at New Bolton Woods and Bolton Woods Quarry

-policy scrc/h2 – a density of 40 dwellings per hectare should be considered where possible – my clients would suggest flexibility with regard to this figure given individual site characteristics and in particular the topographical features of the quarry site

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-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 clients acknowledge 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.

-policy scrc/st1 – any transport improvements deemed necessary would be determined by individual scheme assessments and integrated into a comprehensive framework

- 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 green space aspects this reference does not appear relevant to the quarry site. Further clarification is requested on this point.

-table 3 page 117 – habitat highway – again my clients would request clarity on this point as this appears unrelated to the quarry site

-paras 5.13 and 5.14 – these paragraphs state that NPPF guidance requires careful attention being given to viability and delivery in 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.

-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.

8 SUMMARY

My clients are predominantly supportive of the content of the AAP and the allocation of the Bolton Woods Quarry site for residential development .

Certain small revisions to the plan are requested as set out within these representations.

I look forward to receiving formal written confirmation that these representations have been duly made as part of the plan's public consultation process and to continued dialogue moving forward through the process .

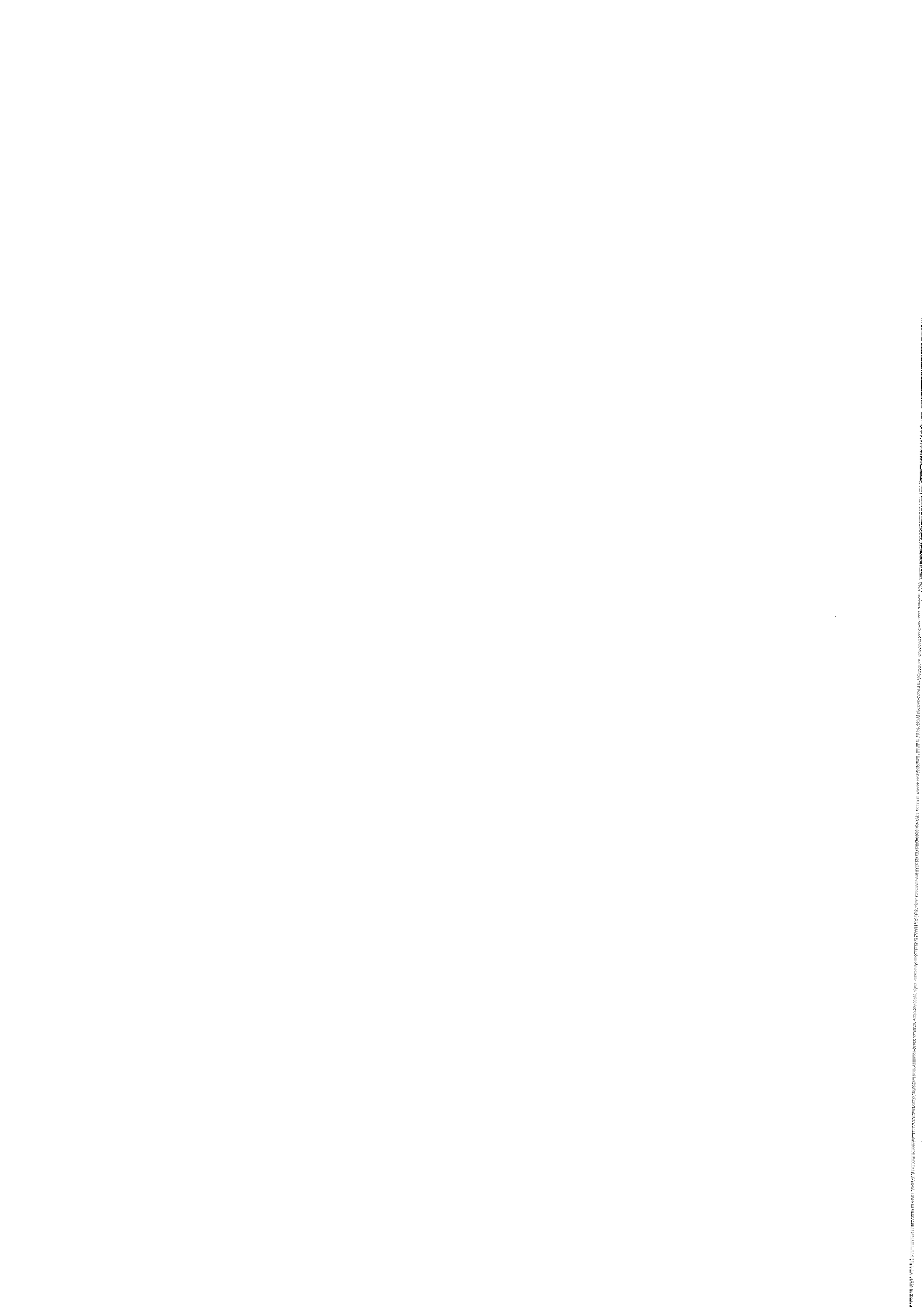
Yours sincerely



Iain Bath BA (Hons) MRTPI

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**Bradford Local Plan: Shipley and Canal Road Corridor
Area Action Plan**

Publication Draft - Representation Form

Monday 14th December 2015 to Monday 8th February 2016

This Plan is now at Publication stage and this is your chance to comment on them before they are examined by a Planning Inspector. We would like to hear your views on the Soundness and Legal Compliance of the Plan. Any terms we've underlined are explained in the guidance notes. Please read these before completing this form.

An online version of the plan (with supporting documents) and this form can be found at www.bradford.gov.uk/planningpolicy

Hard copies of the Plan can also be viewed at the Council Planning Offices and main libraries.

For further information you can contact the Development Plans team by:

- **Emailing us at:** planning.policy@bradford.gov.uk
- **Phoning us on:** (01274) 433679

Please make your representation on this form

Please return this completed representation form to the Development Plans Team by either:

- **E-mail to:** planning.policy@bradford.gov.uk
- **Post to:** Development Plans, City of Bradford Metropolitan District Council, 2nd Floor
South, Jacobs Well, Nelson Street, Bradford, BD1 5RW

Comments must be received within the 8 week consultation period which will run from Monday 14th December 2015 until **1.00 pm on Monday 8th February 2016**

Personal Details & Data Protection Act 1998

The council is required by law to publish the comments you send us about the Plans, including your name and postal address. Your comments will be made available for the public to read in council offices and online. Your telephone number, email address, and signature will not be published. In addition, the council is required to provide all information submitted to us, including all personal information, to the Planning Inspectorate and their designated Programme Officer as part of the public examination of the Shipley and Canal Road Corridor Area Action Plan. The Planning Inspectorate may use your personal information to contact you during the public examination process. All data provided to the Planning Inspectorate and their programme officer will be shared in accordance with the Data Protection Act 1998. Please note that we cannot provide anonymity or accept comments marked 'private' or 'confidential'. Comments that include offensive, racist, discriminatory, threatening and other non-relevant statements will be destroyed.

PART 1 – Your Details

Personal Details / Clients Details

Agents Details

Title	THE MARSHALL GROUP	IAIN BATH PLANNING
First Name	% AGENT.	[REDACTED]
Last Name		[REDACTED]
Job Title		PLANNING CONSULTANT
Address		[REDACTED]
		[REDACTED]
		[REDACTED]
Post Code		LS 29 [REDACTED]
Phone / Mobile		[REDACTED]
Email		[REDACTED]

PART 2 – What comment do you wish to make?

Please use a separate response form for each comment.

2.1 Which section of the Plan do your comments relate to?

a) **A specific site / designation in the Plan**
 Site reference from the document or map
 (e.g. B/1.1)

BWQ 1.

*

PLEASE SEE ATTACHED LETTER FOR ALL
 COMMENTS.

b) **Another part of the Plan**
 Title of the document (e.g. Publication Draft,
 Sustainability Appraisal)

[REDACTED]

Policy Reference (e.g. CL1) [REDACTED]

Paragraph Number [REDACTED]

Diagram / Map [REDACTED]

Other [REDACTED]

c) **Site previously considered and not allocated in the plan**

Reference [REDACTED]

Address [REDACTED]

[REDACTED]

[REDACTED]

d) A new site which has not been considered – Please attach site map

Address

PART 3 – Is the Plan sound?

At this stage, before the Plan is sent to the Secretary of State for Public Examination, we are asking for your views about the 'soundness' of the plan. An independent Inspector will examine the plan against the 'tests of soundness'

3.1 Do you consider the Plan to be sound?

YES (Go to 3.3)

NO (Go to 3.2)

3.2 Which test of soundness does your comment relate to? You must select at least one

Positively Prepared

Effective

Justified

Consistency with National Policy

3.3 Please set out why you think the Plan is sound / unsound

Your comments should briefly cover all the evidence and supporting information necessary to support or justify your view. It helps us if you can use subheadings to deal with specific issues. Please continue on a separate sheet if you need to. There may not be another opportunity to make further comments before the plan is sent to examination.

PLEASE SEE ATTACHED LETTER
FOR ALL COMMENTS.

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

You will need to say why this change will make the Plan. It helps us if you can be precise as possible and providing any suggested revised wording. Please continue on a separate sheet if you need to.

PLEASE SEE ATTACHED LETTER
FOR SUGGESTED CHANGES.

PART 4 – Is the Plan legally compliant

4.1 Do you consider the Plan legally compliant?
 YES NO Don't Know

4.2 Which part of legal compliance is your comment about?
 Local Development Scheme Planning and Compulsory Purchase Act 2004
 Statement of Community Involvement Sustainability Appraisal
 Consultation of appropriate Statutory Bodies Town & Country Planning (Local Planning) Regulations
 Duty to Cooperate

4.3 Please give details of why your consider the Plan is / is not legally compliant
Please try to be as precise as possible, using headings to break up your comments and continue on a separate sheet if you need to.

PLEASE SEE ATTACHED LETTER FOR ALL COMMENTS .

PART 5 – Take part in the examination

5.1 Your comments will be taken into account by the Inspector.
Would you like to take part in the forthcoming Public Examination?
 YES NO
N.B. The Planning Inspector will decide the best way to hear from those who wish to take part in the examination

PART 6 – Future Updates

6.1 Would you like to be notified of any of the following?
 The Submission of the Plan for Public Examination
 The Adoption of the Plan

Please Sign and Date this form

Signature  Date dd/mm/yy

Thank you for taking the time to give your comments on the Shipley and Canal Road Corridor Area Action Plan.
If you would like to make another comment on another site or different part of the Plan, please use a separate response form.