#### CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL

### BRADFORD CITY CENTRE AREA ACTION PLAN EXAMINATION

Inspector: Louise Nurser BA (Hons) Dip Up MRTPI Please direct all communications to:

Tony Blackburn, Programme Officer, 15 Ottawa Close, Blackburn, BB2 7EB.

Email: tony.blackburn@bradford.gov.uk

Tel: 01254 260286

Bhupinder Dev City of Bradford MDC

(by email)

12 May 2016

Dear Mr Dev

#### INSPECTOR'S INITIAL QUESTIONS AND OBSERVATIONS ON THE SUBMITTED BRADFORD CITY CENTRE AND SHIPLEY AND CANAL ROAD CORRIDOR AREA ACTION PLANS

As you know, I have been appointed to examine the two recently submitted Area Action Plans (AAPs). After reading through the submitted documents, I have a number of initial questions to which I would be grateful for a response.

I understand from the representations made by the Environment Agency that Bradford was affected by last year's Boxing Day floods. As the evidence which accompanies both AAPs predates this severe event this raises obvious concerns that the allocations set out in the two plans have been made in the absence of the most up to date information. Therefore, I would be grateful to understand how this is to be addressed.

It is clear from the viability assessments<sup>1</sup> of commercial and housing sites within both AAPs that the majority of the sites are not commercially viable, even without any additional costs. This lack of viability appears to be compounded by the high density at which some of the housing is envisaged to be built. I am aware that a number of potential interventions have been suggested. However, I would appreciate further understanding of how these serious viability issues are proposed to be overcome so that the AAPs are able to realistically deliver the

<sup>&</sup>lt;sup>1</sup> Area Action Plan Viability and Delivery Strategy- Shipley Canal Road Corridor Cushman and Wakefield 2015

Draft Area Action Plan and Delivery Strategy- Bradford City Centre Cushman and Wakefield 2015

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levels of housing identified within the emerging Core Strategy over the plan period.

Reference is made to the need for additional school places over and above that which could be catered for on existing sites within the City Centre AAP, and that CBMDC is exploring sites for a new secondary school either in the CCAAP area or the SCRCAAP. However, as far as I am aware no specific allocation for a secondary school has been made which appears surprising given its importance as supporting infrastructure. Nor, is it clear how demand for primary school places will be provided for. Similarly, whilst the City Centre is envisaged to provide for 6000 additional net jobs it is not clear how this figure has been translated into a requirement for land or the office space allocations proposed within the plan.

From my initial appraisal of the CCAAP I am aware that a number of the development sites are currently in use as surface car parks. In the absence of a parking strategy for the City Centre I am concerned how the potential loss of a significant number of parking spaces would impact on the City Centre, particularly, in the context of reduced on- site parking provision.

I am also aware that Natural England has requested that amendments are made to the policies of both AAPs following the proposed main modifications to policy SC8 of the emerging Core Strategy. I would also welcome the Council's view on this matter.

I would be grateful if you could let me know, via the Programme Officer, how you are intending to address the significant concerns which I have raised and how long you are likely to require to address them.

I would stress that this letter represents my initial assessment of the AAPs, and does not represent all of the issues which I am in the process of identifying. However, I feel that it is important to provide you with the opportunity to address these issues, as soon as possible, to help my consideration of the soundness of the two AAPs. I may have further questions to which I would like answers prior to my formulating my formal Matters Issues and Questions.

As an aside, I note that there are some inconsistencies between boundaries and names of neighbourhoods within documents. Also, a number of the figures have poor resolution and are therefore difficult to see.

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I look to hearing from you.

Yours Sincerely

Louise Nurser

Inspector