# Representations to the Bradford Core Strategy Publication Version

On behalf of Keyland Developments Ltd

March 2014



# Representations to the Bradford Core Strategy Publication Draft On behalf of KeyLand Developments Ltd

Status:	Draft	Final	
Issue/Rev:	P1	P1	
Date:	24/03/2014	31/03/2014	
Prepared by:	CA	CA	
Checked by:	ЭН	ЭН	

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Ref: 23214/A5/P1/CA

Date: March 2014

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## 1.0 Introduction

- 1.1 Barton Willmore has been instructed by Keyland Developments Ltd (herein referred to as "Keyland") to respond to the Bradford Core Strategy Publication Draft Document (herein referred to as "the Core Strategy").
- 1.2 Keyland Developments Ltd is the property development business and forms part of the Kelda Group. As a sister company of Yorkshire Water, one of its main activities is the redevelopment and regeneration of surplus and redundant Yorkshire Water operational sites. They have land interests in Bradford and are therefore a key stakeholder in the area and have a keen interest in the development of the Core Strategy which seeks to promote a suitable and flexible planning policy framework for the delivery of housing and jobs to meet the growth needs of the City.
- 1.3 These representations are made in respect of the areas of the Waste Water Treatment Works at the Esholt Estate, Bradford (herein referred to as "the Site") that are now redundant having been released from operational use following a substantial investment in the existing facilities. The extent of the Site that is the subject of these representations is shown on the Site Plan at Appendix 1. The redevelopment of the Site will provide an opportunity to deliver a high quality employment-led mixed use development incorporating residential development.
- 1.4 The remainder of this report sets out our Client's representations to the Publication Version of the Core Strategy, with specific regard to Sections 3, 4 and 5. In addition to the representations, a Promotional Document has been prepared with demonstrates that deliverability of the Site.
- 1.5 The National Planning Policy Framework (the NPPF) came into effect on the 27<sup>th</sup> March 2012 and sets out at paragraph 182 the tests that are required in order for the Core Strategy to be found "sound". These are set out below:
  - Positively prepared the plan should be prepared based on a strategy which seeks
    to meet objectively assessed development and infrastructure requirements from
    neighbouring authorities where it is reasonable to do so and consistent with achieving
    sustainable development;
  - Justified the plan should be the most appropriate strategy, when considered
    against the reasonable alternatives, based on proportionate evidence;
  - Effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

 Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

# 2.0 Representations to Section 3 – Spatial Vision, Objectives and Core Policies

- 2.1 Section 3 of the Core Strategy sets out the overarching spatial vision for the District up to 2030 and provides strategic policies that aim to ensure that the proposed vision is met throughout the plan period. These representations focus upon the Publication Draft of the Core Strategy, with particular regard to the following elements:
  - · The proposed Economic Growth Areas;
  - The Sub Area Policies;
  - · Green Belt Policies; and
  - · Economic Policies

#### Strategic Objectives

#### Policy P1 - Presumption in Favour of Sustainable Development

- 2.2 Our Client supports the inclusion of Policy P1 within the Core Strategy which seeks to ensure that planning applications that accord with an up to date Local Plan are approved without delay and where there are no relevant policies, or they are out of date, applications will be approved unless the impacts of doing so would significantly and demonstrably outweigh the benefits. The policy is considered to be in accordance with paragraph 14 of the NPPF.
- 2.3 In addition, our Clients are encouraged to see that the policy states that the Council will always work proactively with applicants to find solutions in order to ensure that development proposals are approved wherever possible. Again, this accords with advice set out in the NPPF.

#### Strategic Core Policies

#### Policy SC1 - Overall Approach and Key Spatial Priorities

2.4 Keyland is generally **supportive** of the contents of Policy SC1 which sets out the overall strategy vision for the District. Our Clients are encouraged by the Council's aspirations to "enhance the role of Bradford District within the wider Leeds City Region as an important business location" and to "optimise the opportunities provided by the close proximity of Leeds Bradford International Airport as an international business gateway". Furthermore,

our Client **supports** the aspiration to transform the economic conditions within the Regional City of Bradford.

- 2.5 Our Client also supports the identification of the Site as an Economic Growth Area as defined within the Location Strategy. The Site represents an excellent opportunity for the Council to facilitate a sustainable employment-led redevelopment that could be closely linked to the proposed railway station at Apperley Bridge and Leeds Bradford Airport, in addition to being located within the Regional City of Bradford. Furthermore, the redevelopment of the Site would be delivered on previously-developed land.
- 2.6 The legend associated with the Location Strategy implies that further information regarding Economic Growth Areas can be found within Policy SC1 of the Core Strategy. However, the policy does not contain any information regarding Economic Growth Areas and our Client **objects** to the Policy as currently proposed. It is considered that the policy should be amended to include a definition as to what the Council is seeking to achieve within Economic Growth Areas, in addition to providing a clear indication as to where such areas are being proposed. It is considered that the following description would provide clarity as to where Economic Growth Areas are being proposed:

"To maximise opportunities for economic growth within the District and in order to deliver areas of high quality employment land, it is proposed to establish Economic Growth Areas in the following locations — North Bradford (Esholt/Apperley Bridge), South Bradford (M606 Corridor), the Airedale Corridor and Ilkley"

With regards to the Economic Growth Area at Esholt/Apperley Bridge it is considered that the following aspiration for the site should be included within the Policy:

"The Sites location at the heart of the Leeds City Region provides an opportunity to develop a high quantum, high quality employment area that can maximise its prominent location within proximity of existing entrepreneurial business along the Airedale corridor and Leeds Bradford Airport".

2.7 Without providing clarity regarding such areas there are concerns that Policy SC1 and the proposed Location Strategy may be considered unsound as currently proposed as the provision of Economic Growth Areas have not been fully justified in accordance with the requirements of paragraph 182 of the NPPF. Providing clarity on this matter will provide greater security for the Council in terms of steering future economic growth through the plan period, in addition to providing assurances to the Inspector at Examination.

#### Policy SC4 - Hierarchy of Settlements

- 2.8 The policy provides guidance as to where the Council proposes to concentrate new development within the District, with settlements listed in a hierarchy. Our Client supports this approach as it gives a clear indication as to the role of settlements within the District and will ensure that development is located in sustainable locations.
- 2.9 Keyland supports the role of the Regional City of Bradford (with Shipley and Lower Baildon) as being the main focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities within the District. Furthermore, our Client supports the inclusion of the Site within the Regional City of Bradford.

#### Policy SC5 - Location of Development

- 2.10 Policy SC5 of the Core Strategy outlines the criteria that will be considered when allocating sites within the Allocations DPD and Area Action Plan DPDs. Our Client supports the proposal for the "re-use of deliverable and developable previously developed land and buildings" as the main priority when considering the suitability of sites for allocation.
- 2.11 Whilst our Client is generally supportive of the proposal for local Green Belt release they object to the specific wording of part A3 of the policy which states that "third priority to Local Green Belt releases to the built up areas of settlements in sustainable locations". Our Client's site is not located adjacent to the built up area of a settlement and there are concerns that the policy as currently worded does not provide sufficient assurance that the Site will be considered when undertaking a Green Belt review. Given that the release of this Site is significant in delivering an Economic Growth Area, it is considered that the Policy could be unsound as currently worded. It is therefore suggested that it is reworded as follows:

"third priority to Local Green Belt releases to the built up areas of settlements and in other sustainable locations"

#### Policy SC7 - Green Belt

- 2.12 Our Client broadly supports the contents of Policy SC7 which acknowledges that Green Belt release is required in order to ensure that the Council can adequately deliver the Districts housing and employment needs.
- 2.13 However, they are concerned and therefore object to the Council's proposals to undertake a selective rather than full Green Belt review. We refer to the interim conclusions of the

Inspector at the Leeds City Council Local Plan Examination, who has considered this approach to be unsound and has therefore recommended the Plan be modified to allow for a full Green Belt review. There are also concerns that the Policy does not provide clear guidance as to the locations where the selective review will be concentrated on and this will not be addressed until the Allocations DPD comes forward.

2.14 In order to ensure that sufficient land is allocated to provide the housing and employment needs of the District, and to prevent further alterations during the plan period, a full Green Belt review should be undertaken. It is advised that the Policy is reworded as follows:

"Green Belt releases required to deliver the longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3 will be delivered by a full review of Green Belt boundaries that accord with the Core policies and the strategic patterns of development set out in Policy SC5".

# 3.0 Representations to Section 4 – Sub Area Policies

- 3.1 The Core Strategy divides the Bradford District into four strategic areas and Section 4 of the document sets out the proposed aspirations and levels of growth that is anticipated in each area. The District is split into the following areas:
  - · Regional City of Bradford including Shipley and Lower Baildon;
  - · Airedale;
  - Wharfedale;
  - Pennine Towns and Villages.
- 3.2 Keyland supports the inclusion of the Site within the Regional City of Bradford including Shipley and Lower Baildon.
  - Policy BD1 The Regional City of Bradford including Shipley and Lower Baildon
- 3.3 The Policy provides details regarding the sub-division of the Regional City of Bradford and the proposed distribution of housing within each area. The Site is situated within the North East sub-area where it is proposed to provide 4,700 new homes, which our Client generally considers to be a suitable figure. However, our Client reserves the right to make further comment regarding the distributions of housing targets at the forthcoming Examination.
- 3.4 Our Client is encouraged by the principle of part C2 of Policy BD1, in which the Site is proposed as a new employment opportunity adjacent to Apperley Bridge. However, our Client objects to the wording of this aspect of the Policy, as it is considered to be too prescriptive and would not allow for flexibility throughout the lifetime of the plan should circumstances change over the next 15 years. Paragraph 21 of the NPPF states that "policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances".
- 3.5 The Council is proposing to provide a "high quality research and development led technology park and commercial enterprise". The southern extent of the Site located adjacent to Apperley Bridge measures approximately 35 hectares in size and could potentially accommodate up to 1.5 million sq ft of employment space. Whilst it is considered possible that the Site could accommodate an element of research and development uses, is not considered appropriate to restrict the Site solely to this use.
- 3.6 The Site is not regarded as a primary distribution location due to its relative distance from major road networks such as the M606 and M62 but is considered to be highly suitable for

small to medium sized businesses, many of which may already be situated within Bradford or Leeds. It is considered likely that such businesses will feed into other manufacturing businesses in the North Bradford area creating supply chain links. The Site would provide an excellent opportunity for the Council to provide a high quality employment site that attracts new-economy businesses. There are approximately 1,280 businesses in manufacturing, utilities and energy within the Bradford District who employ approximately 25,000 people. These people account for 12.8% of all employees compared to 9.8% in Great Britain as a whole. A report prepared by Dove Haigh Philips which is included at Appendix 2, provides further evidence as to the type and demand of businesses that the Site will attract.

- 3.7 The Promotional Document that has been prepared in support of the Site demonstrates the deliverability of the Site and further emphasises the unique opportunity provided at Esholt. The proximity of the Site to indigenous business is graphically illustrated by Plan No. GIS01 included at Appendix 3, which maps the current position of business activity within both a 5 mile and 7 mile radius of the Site. The development of the Site would utilise previously developed land and would not lead to the loss of greenfield land. It is considered that these qualities, together with the high quality setting, will attract innovators, entrepreneurs and investors to Esholt who need a 'best in class' base which reflects the values of their growing businesses.
- 3.8 There are concerns that the proposals outlined in part C2 of Policy BD1 have not been fully justified by the Council and cannot be considered to be sound. This is on the basis that it does not comply with the requirements of paragraph 182 of the NPPF with regard to being justified and effective.
- 3.9 The wording of the Policy should be amended so that it provides greater flexibility as to the end use of the Site. The Policy should read as follows:
  - "A new employment opportunity including high quality research and development and new economy businesses linked to the Airedale Corridor will be located at Apperley Bridge"
- 3.10 It is considered that the above will ensure that a high quality employment site comes forward at the Site which includes research and development uses whilst also providing greater flexibility to allow other suitable employment uses at the Site.

# 4.0 Representations to Section 5 – Thematic Policies

4.1 Section 5 of the Core Strategy provides policy guidance regarding a number of key themes such as the economy and jobs, housing and transport.

#### Policy EC2 – Supporting Business and Job Creation

- 4.2 The Policy states that the Council will aim to deliver at least 2,897 jobs annually throughout the lifetime of the plan and in order to achieve this they will plan for an employment supply of at least 135ha. Our Client generally finds this target to be acceptable although they reserve the right to make further comments at the Examination into the Core Strategy.
- 4.3 However, our Client strongly objects to the Council's proposal within part A of the Policy to refuse planning permission for alternative uses where land has been allocated for employment purposes. This would fail to meet the requirements of paragraph 21 of the NPPF and would not provide any flexibility to account for changes in circumstances that may occur through the lifetime of the plan. It is considered that a caveat should be included within the Policy to allow for an alternative use if it has been successfully demonstrated that the site is no longer viable for employment purposes following a specific period of marketing.
- 4.4 The Policy as currently proposed is not considered to be sound as it is not justified, effective or consistent with national policy and as such would not comply with the tests set out in paragraph 182 of the NPPF.

#### Policy EC3 - Employment Land Requirement

- 4.5 Our Client generally agrees with the Council's proposals to provide 100ha of the District's overall employment land within the City of Bradford. Our Client reserves the right to make further comments at the Examination into the Core Strategy.
- 4.6 In addition, our Client is encouraged by the proposal at part C of the Policy to undertake Green Belt deletions through the Allocations DPD to provide high quality employment locations. The Policy makes specific reference to undertaking Green Belt deletions "within North Bradford tied to the locational benefits of proximity to Leeds Bradford International Airport and Apperley Bridge Rail Station". However, as stated in Section 2 of these representations, our Client objects to the Council's proposal to undertake a selective review of the Green Belt and believe that a full review is required.

Policy HO2 – Strategic Sources of Housing Supply

- 4.7 Keyland is keen to ensure that the Council delivers a Plan that is sufficiently robust, comprehensive and sound and therefore have an interest in the housing policies contained within the Core Strategy.
- 4.8 Part 3 of the Policy states that the Council's housing requirement will be partially met through the local Green Belt release. As stated within these representations our Client is concerned that the Council are only proposing to undertake a selective Green Belt review. It is considered that full Green Belt review should be undertaken. This is further emphasised by the lack of clarity that is provided within the Core Strategy with regards to the proposed locations of the selective review.

#### Policy H04 - Phasing the Release of Housing Sites

- 4.9 The Council's approach to phasing and releasing of housing sites across the district is contained within Policy HO4 of the Core Strategy. It proposes the release of land for housing development in two phases; one covering 8 years of the plan (2015 2023) (on the basis that the Core Strategy is adopted by 2015) and the other covering the remaining 7 years of the plan (up to 2030). It is intended that whilst the phasing of the release of land will need to be consistent with Policy HO3 of the Core Strategy, it will also depend on a number of future site allocating development plan documents coming forward which will provide further detail.
- 4.10 Nevertheless, for the time being, Appendix 6 of the Core Strategy provides a housing trajectory which broadly splits the delivery in the following way:
  - 2015/16 2022/23 = 18,300 dwellings
  - 2023/24 2029/30 = 25,000 dwellings
- 4.11 The justification for this approach for the Council is that a phased approach to housing is necessary to ensure a sustainable pattern of development and that the correct infrastructure is in place to support the housing.
- 4.12 It is our Client's view that the notion of phasing the release of housing sites is unsound and on this basis **objects** to Policy HO4.
- 4.13 The Framework is clear in Paragraph 47 that it is the local planning authority's role to 'boost significantly' the supply of housing and subsequently the Framework does not support the phased release of housing land. This would indicate prima facie that the Council's approach

is inconsistent with national planning policy and that Policy HO4 has not been prepared positively and is ineffective in light of Paragraph 47's overall approach.

- 4.14 Whilst Paragraph 47 also states that the Council should provide its own housing trajectory and housing implementation strategy (which the Council has duly undertaken) the nature of the current implementation strategy is unnecessarily constraining housing delivery earlier on in the plan period by allowing an average of 2,288 dwellings per annum from 2015/16 to 2022/23 and then 'ramping up' house building later on in the plan period to an annual average of 3,571 dwellings from 2023/24 2029/30.
- 4.15 Contrary to the justification that the Council has sought which mentions the need to create a sustainable pattern of development (paragraph 5.3.65 of the Core Strategy), it is considered by our Client that constraining the release of housing sites earlier on in the plan period will in itself lead to unsustainable patterns of development in that it will inevitably lead to imbalanced local housing markets and commuting as a result of constrained supply.
- 4.16 The Council also seek to justify constraining the release of housing sites to allow infrastructure to come forward to support development, however with the inevitable introduction of the Community Infrastructure Levy (CIL) and the continuing use of S106 contributions (be it individual or pooled contributions) it should be possible to deliver the necessary infrastructure alongside the delivery of any housing development without the need to constrain housing delivery.
- 4.17 The need to provide a 5 year supply of housing land as highlighted in paragraph 47 is indeed important and it explicitly referenced by the Council in paragraph 5.3.70 of the Core Strategy to support Policy HO4. It is noted however within the Council's own evidence base (namely the 2013 SHLAA update) that the Council currently does not have a 5 year housing land supply and in fact has a supply closer to 2.3 years (as a best case scenario) with a notable shortfall in dwellings which has accumulated over recent years.
- 4.18 To overcome this significant shortfall and given the confirmation in the National Planning Policy Guidance (NPPG) that any backlog should be addressed in the first five years, it is clear that the Council should be seeking viable sites much earlier in the plan to provide delivery and address its current shortfall. Phasing of sites in the way that the Council proposes will not achieve such results (in fact it will simply exacerbate the situation); particularly as the Council is seeking to promote sites in regeneration areas and on previously developed land which are likely to have viability issues.

4.19 To enable Policy HO4 to be sound, the Council needs to remove the requirement to phase development over the plan period and to allow dwellings to come forward in a way which reflects the principles of paragraph 47 of the Framework. Furthermore, Inspectors have concluded at the Leeds City Council Core Strategy Examination and the Rotherham Metropolitan Borough Council Local Plan Examination that the proposal to phase the delivery of housing should be deleted from the Plan.

#### Policy HO5 – Density of Housing Schemes

- 4.20 Policy HO5 seeks a minimum density of 30dph across all sites. It is unclear whether such a requirement relates to net or gross site areas. Given other requirements within the plan, such as open space and Policy DS3 it is important that any requirement should relate solely to the net developable area. Whilst paragraph 47 of the Framework permits the Council to set out its approach to housing density to reflect local circumstances our Client has not seen any substantive evidence to support the Council's position. On this basis the policy is unsound as it cannot be justified.
- 4.21 It should also be noted that the policy requirements may create conflict with other policies particularly Policy HO8, which seeks larger homes and need for accessible homes both of which need larger floor areas and therefore will reduce densities, and Policy DS3 which seeks development to be within the context of its urban character.

# Policy H09 - Housing Quality

- 4.22 Whilst our Client does not dispute the need to provide for quality homes over the plan period, there are concerns regarding the wording of Policy HO9.
- 4.23 Part A of the policy requires developers to submit Building for Life ('BfL') Assessments with planning applications over 10 dwellings. Whilst our Client already strives to meet the 12 standards of BfL, we believe it is overly onerous to require developments for formally submit such assessments as they will simply create additional costs and burdens. As the evidence required to justify the mandatory requirement for such an assessment has not been made we believe this element of the policy is unsound as it is unjustified. To make this part of the policy sound the Council should withdraw or make optional the requirement for such an assessment.
- 4.24 Part B of the policy requires that developments conform to Code for Sustainable Homes (CfSH) Level 4 and achieve zero carbon homes by 2016. Given that the Government through its Standards Review is withdrawing the CfSH and are making zero carbon homes a building

- regulations requirement, then there is no need for this element of the policy and to include it would be unsound because it is unjustified. We therefore seek Part B's removal.
- 4.25 Part C of the policy requires accessible homes adaptable to changing needs over the occupants' lifetime. Paragraph 5.3.140 interprets this as Lifetime Homes standards. Whilst our Client is supportive of accessible homes and many developers already conform to such standards, the policy should seek to encourage rather than require a specific standard. The Lifetime homes website quotes additional costs per dwelling for implementing the standards to be in a range from £545 to £1615 per dwelling. This is not an insignificant figure when it is considered that much of the plan area is unviable or marginal even with no additional burdens placed upon it. In addition, due to the fact that Lifetime Homes generally require a larger footprint but do not provide additional revenue, the costs on site of providing Lifetime Homes are often multiplied. This issue does not appear to have been considered within the Viability Study. On this basis Part C of the policy is unsound given that it is not justified against the evidence base provided by the Council. As such Part C should be adapted to ensure that such standards are optional/aspirational and not mandatory.
- 4.26 Part E of the policy outlines space standards for houses within the District. This part of the policy is unsound as it is unjustified; especially as Government has signalled the introduction of national space standards. There is little evidence to support this locally based standard and indeed its introduction will be to detriment of house building in the area as the requirement to build larger homes will mean more expensive homes which will price individuals and families out of mainstream housing. The Council in fact notes within its Housing Background Paper (Paper 2) that these standards may indeed not be feasible or viable. It is therefore queried how the Council can justify the inclusion of such standards and as such our Client seeks their removal.

# Policy HO11 - Affordable Housing

- 4.27 Whilst our Client supports the notion of different affordable housing contributions in different areas of the District outlined in Policy HO11, we note from studying the Council's Local Plan Viability Assessment that the current proposals for affordable housing render developments in all areas apart from highest value market areas as unviable even in the event of a significant pick-up in the market. On this basis the policy is unsound as it will be unjustified based on the Council's own evidence.
- 4.28 This situation deteriorates further when the cumulative impact of the CSDPD's policies are taken into account with the *Local Plan Viability Assessment* stating:

"The cumulative impact of the proposed policy standards shows that even in the more viable parts of the District, the impact could be to compromise / undermine the delivery of development."

- 4.29 This further reinforces the fact that the policy as drafted is unsound. Whilst the policy allows for negotiation on the amount of affordable housing to be provided on a case by case basis (in relation to viability), as it currently stands, this would require the majority of schemes to go through this process which will further delay the delivery of much needed housing in Bradford.
- 4.30 To address this issue the Council should seek to reduce affordable housing levels to align with its Viability Assessment.

## 5.0 Conclusions

- Our Client is fully supportive of the Council's proposals to deliver a high quality employment-led mixed use development at the redundant elements of the Waste Water Treatment Works at Esholt, and this is reflected within the relevant policies of the Core Strategy.
- 5.2 Notwithstanding this, our Client has concerns regarding certain policies within the Plan in its current form, some of which are considered to be flawed and would not meet the tests of soundness outlined in paragraph 182 of the NPPF.
- 5.3 In particular, our Client's site is identified in the Core Strategy as being an Economic Growth Area where the Council are proposing to bring forward a high quality employment-led development, yet there is no definition or explanation with the Core Strategy as to what constitutes an Economic Growth Area. As this forms an important part of the Council's growth strategy throughout the plan period, there are concerns that the Plan would not be considered sound or justified, particularly as the Site would need to be released from the Green Belt.
- 5.4 In addition, it is considered that a full Green Belt review as opposed to a selective review should be undertaken and the Council should delete the proposal to phase the delivery of housing, particularly in light of the recent Inspectors conclusions at Local Plan Examinations.
- 5.5 We would be grateful to receive acknowledgement of receipt of these representations in the first instance. Please keep us informed of all future opportunities to comment on any of the documents of the Bradford Council Local Plan.

Appendix 1

Site Location Plan



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Appendix 2

Esholt for Business Occupiers

## **Esholt for Business Occupiers**

Esholt site is the historic result of strategic land assembly by a key utility company who needed to assemble a large flat site in close proximity to the population of Victorian Bradford.

Over a century later the release of this land has been made possible by further major investment in new technology by the water company.

This release presents a unique opportunity for the new economy of Bradford which would not be available without that historic commitment to land assembly within the urban area by Yorkshires water utility provider.

Today the industrial economy of Bradford District is known as a producer city in which businesses create innovative goods and services, making them competitively and trading them globally.

Bradford has a proud industrial heritage but the modern reality of Bradford's economic scale and breadth is an £8.3 billion economy which ranks as the 8<sup>th</sup> largest in England and as a globally significant centre for manufacturing.

There are over 15,000 businesses employing almost 200,000 people in Bradford which accounts for 15% of the total employment within the Leeds City Region.

25,000 people are employed in production in the city by 1,280 businesses in manufacturing, utilities and energy. These people account for 12.8% of all employees compared to 9.8% in Great Britain as a whole.

Bradford has a young population and a powerful culture of entrepreneurship with a growing track record of new business start ups.

A number of major companies have their headquarters within the district including Morrisons, Yorkshire Building Society, Police, Kelda Group, Santander and Hallmark Cards.

The Esholt site is uniquely placed, to deliver a new quality and quantum real estate facility for the Bradford Economy and wider city region.

The Esholt site is unique, in several fundamental aspects.

Scale: A very large brownfield site within the single ownership and control of Kelda Group, one of Bradford's largest companies.

Availability: Keyland Developments / Kelda Group have the resources to deliver a large

quality site for industry which is compatible with its adjoining and ongoing

utility operations.

Location: The Esholt site is within the heart of Leeds City Region at the gateway to the

Aire Valley towns and immediately adjacent to the population of Bradford City

Centre.

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# DOVE HAIGH PHILLIPS

In Bradford the M606 corridor is well developed and provides the motorway gateway to the city for large scale logistics and supply chain operations.

The Esholt site is well positioned to serve the growing entrepreneurial population of the Aire Valley and wider district.

Many smaller and medium sized companies will be attracted by the proximity of the site to their existing investments and workforces.

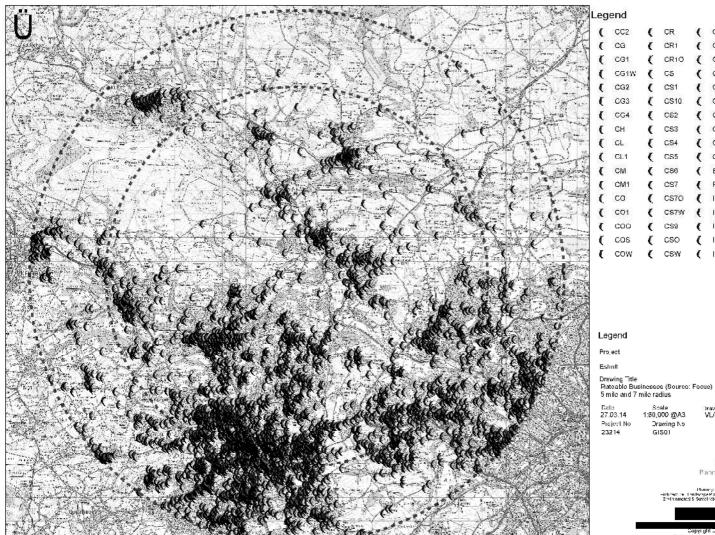
This is a quality location with good accessibility for decision makers and with strong links to Leeds Bradford International Airport.

These powerful qualities will attract innovators, entrepreneurs and investors to Esholt who need a 'best in class' base which reflects the values of their growing businesses.

Esholt can provide a vital factor of economic production to assist growing businesses spread across many sectors to flourish, expand and contribute significantly to the new economy of Bradford.

Appendix 3

Businesses Located within 7 Mile Radius of Site



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