

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Keyland Developments Limited****(Representor ID: 444)*****Matter 3: STRATEGIC CORE POLICIES*****Preamble**

1. Keyland Developments Limited ("our Client") is the property development business of Kelda Group and a sister company of Yorkshire Water. Our client has been operating across Yorkshire for over 20 years, redeveloping and regenerating surplus and redundant Yorkshire Water operational sites for a range of uses and in doing so, facilitating development across the region.
2. Our Client owns the areas of the Esholt Waste Treatment Works at the Esholt Estate (the Site) that are now redundant having been released from operational use following a substantial investment in the existing facilities.
3. The Site has the potential to deliver a significant and high quality employment led mixed use development that would make a significant contribution to Bradford's future development needs through the redevelopment of a brownfield site.
4. As a key stakeholder in the Bradford district our Client has 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.
5. This statement should be read alongside our previous written representations and Promotional Document submitted in relation to the emerging Core Strategy.
6. Our response to Matter 3, which covers the Strategic Core Policies, is contained in this statement. The key issue highlighted by the Inspector is:

*“Is the overall approach and Key Spatial Priorities, the justification for the proposed Settlement Hierarchy, the principles of location of development, the general approach to Green Belt, for Bradford, and the approach to development proposals in the South Pennine Moors Zone of Influence soundly based, effective, appropriate, deliverable, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment, and other development, and is it positively prepared and consistent with the latest national policy?”*

7. We consider below the relevant specific questions asked by the Inspector:

**Policy SC1 – Overall approach and key spatial priorities**

**a) How does the policy identify appropriate spatial priorities, and where is the justification and evidence?**

8. Our Client is broadly supportive of Policy SC1. The NPPF states at paragraph 7 that there are three dimensions to sustainable development; economic, social and environmental. It is considered that the Council’s overall approach and key spatial priorities conform to this and represent a balanced approach that ensures that all three dimensions are delivered with the outcome being a more sustainable pattern of growth and movement across the district. The spatial priorities are based on the delivery of the Core Strategy Vision and Objectives and flow from a number of background documents including the Community Strategy and Employment Land Review.
9. However as set out in our previous representations, the key associated with the Key Diagram - Location Strategy (page 67) 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 therefore 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 additional aim added to Part B of the Policy would provide clarity in relation to the Economic Growth Areas:

**“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.”**

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

**“The Site’s 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”.**

11. Without providing clarity regarding such areas there are concerns that Policy SC1 and the proposed Key Diagram - 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 certainty in terms of steering future economic growth through the plan period and in the production of future development plan documents.

#### **Policy SC4 – Settlement Hierarchy**

**a) Is the Settlement Hierarchy for each town and settlement appropriate, effective, locally distinctive, justified and soundly based, and is it positively prepared and consistent with the latest national policy?**

12. The Settlement Hierarchy is based on the existing characteristics and settlements and their intended role through the Plan period, reflecting the Core Strategy’s Spatial Vision. The characteristics of settlements within the hierarchy take account of a range of factors (as set out in the 2011 Settlement Study) including population, the availability of services and facilities, infrastructure requirements and population.
13. The Settlement Hierarchy allows for the prioritisation of growth at sustainable locations. By concentrating growth according to the hierarchy, development will occur at the most sustainable locations and enable regeneration opportunities to be released over the plan period. In particular our Client supports the Regional City of Bradford performing a regional role and being the prime focus for development.

**a) What is the basis of the proposed Settlement Hierarchy, and is it based on up-to-date and reliable evidence?**

14. The Settlement Hierarchy is based on robust evidence and reasoning which is presented in the Draft Settlement Study (2008), Settlement Study Update (2001), Local Infrastructure Plan (2011) and Community Strategy 2011-2014. The Council's approach seeks to create a settlement hierarchy which will promote a sustainable development pattern and will allow for the delivery of development in tandem with the necessary supporting infrastructure.

**a) Is the status of various settlements (e.g. Ilkley, Burley-in-Wharfedale) in the settlement hierarchy fully justified and soundly based; and are the various criteria for each level of the hierarchy appropriate and fully justified?**

15. Our client supports the position of the Regional City of Bradford at the top of the Settlement Hierarchy on the basis that it is appropriately designated and is justified in the Council's supporting evidence base.

16. In addition the criteria for the City are considered to be appropriate and justified. They will help to ensure that the redevelopment of previously developed sites is maximised and support a sustainable pattern of development concentrated within the City and its surrounding area whilst also ensuring much needed regeneration takes place. In particular our client supports the aim to improve connectivity between the City and the Airedale Regeneration Priority Area and the Regional City of Leeds.

**Policy SC5 – Location of Development:**

**a) What is the justification for setting the priorities and criteria for locating new development; is it supported by evidence, appropriate and soundly based?**

17. The Council's justification for setting the priorities and criteria for locating new development is that the a sequential approach is fundamental in terms of future site allocations for various reasons including the reuse of brownfield land and existing infrastructure and services, strengthening the Role of the city and Principal Towns and minimise the need to travel and to develop Greenfield land. In addition Policy SC5 seeks to avoid significant adverse environmental impacts.

**a) Does the policy make the appropriate balance between prioritisation of brownfield land, use of brownfield land and windfalls, and Greenfield land, and safeguarded land?**

18. Given that the Council's main priority in considering the suitability of sites for development is the *"re-use of deliverable and developable previously developed land and buildings"* (as set out at Part A.1.) It is considered that approach to Green Belt releases/allocations is unsound. Whilst the principle of Green Belt releases is supported by our Client on the basis that they are necessary (as set out in further detail in below) our Client objects to the fact that Policy SC5 does not take into account previously developed sites within the Green Belt in sustainable locations outside of the built up areas of settlements.

19. For example, our Client's deliverable previously developed site is not located within the built up area of Bradford 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"**

20. We expand on this point further under our comments relating to Policy SC7.

**b) How will sites be assessed and are the accessibility standards inflexible?**

21. The policy suggests that the Council will use an accessibility orientated approach when identifying and comparing sites for development. Sites could be discounted for development should they not meet these standards. However there are likely to be sites that could come forward for development which whilst they would not meet the standards now, could meet them through the implementation of the proposed development i.e. contributions towards the provision of a new bus route, or improvements to the footpath or cycle network or through provision of other planned infrastructure such as new rail stations.

22. The standards are also not justified as there is only a limited amount of background evidence available against which to assess the sites and it would appear premature to adopt a set of accessibility standards which are not based upon a robust evidence base. In their current form the accessibility standards are inflexible.

**Policy SC7 – Green Belt**

**a) Is the proposed approach to the Green Belt appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy (NPPF; 84), particularly in terms of:**

- i) Identifying the exceptional circumstances necessary for using Green Belt land;**
- ii) Demonstrating the need to promote sustainable patterns of development, including the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (NPPF; 84);**

23. A Green Belt review is clearly required to ensure that the City of Bradford meets its identified development needs rather than transferring the requirement elsewhere. The overriding objective to accommodate development where it is needed in order to support the local economy, cannot take place elsewhere in the district and still have the same effects of securing the City's regeneration and long term health. Therefore exceptional circumstances exist which justify a need to strategically assess growth options across the Green Belt.

24. The Council has provided evidence to justify its approach (see for example Background Paper 1, the Growth Assessment and paragraph 5.1.19 of the Core Strategy). These documents identify that the exceptional circumstances needed to justify altering Green Belt boundaries are essentially the need to allocate sufficient land for market and affordable housing and employment development, combined with the significant adverse consequences for patterns of sustainable development of not doing so, since it is not practicable to fully meet the development needs of the area without amending the Green Belt boundaries.

25. The underlying objective of the Core Strategy is to deliver the largest proportion of growth to the Regional City of Bradford and this is clearly set out in Policy SC4. As a result of focusing growth to the City to satisfy sustainability objectives, it is recognised through the SHLAA and Growth Assessment that there are a lack of suitable sites to meet identified housing and employment needs within the existing settlement boundaries. This evidence base work provides further justification for exceptional circumstances for alterations to the Bradford Green Belt boundary.

**a) Whether there should be a full or selective review of the Green Belt, and would such a review be co-ordinated and agreed with neighbouring authorities?**

26. See comments below.

**a) What evidence is available to justify decisions to release particular areas of Green Belt for development?**

27. The Growth Study, Housing Background Paper and SHLAA all provide evidence of the need to release Green Belt for development in order to meet Bradford's identified housing needs.

28. The 2013 SHLAA demonstrates that in order to meet its housing needs in full, there is a requirement to accommodate a significant number of dwellings (circa 11,000) on Green Belt land based on the Council's assessment of housing need.

29. The NPPF (paragraph 84) makes clear that when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. Accordingly, our Client supports the identification of North East Bradford as a location where Green Belt boundaries will be revised (see Key Diagram – Location Strategy and Policy BD1). This will contribute to the development of sustainable communities and help to support a balanced pattern of development across the district.

30. However we refer to The House of Commons Note on Green Belt published on 10<sup>th</sup> December 2014 which notes that there is considerable previously developed land in many Green Belt areas which could be put to productive use. Councils are encouraged to make best use of this land. Given the constrained nature of Bradford district, it is considered that there is justification to release such areas of Green Belt for development. Accordingly, our Client considers that its Site should be identified as a 'Potential Localised Green Belt Deletion' on the Key Diagram on the basis that it is a sustainable location where such a release would be appropriate and reflects the desire for an Economic Growth Area in this location together with a new high quality employment opportunity as set out in Policy BD1. The Promotional Document submitted with our Client's previous representations includes a Green Belt assessment of the Site against the five purposes of the Green Belt set out in the NPPF. The assessment concludes that the Site comprises brownfield land and is visually well contained with clearly defined boundaries. A clear distinction between developments can be maintained. In addition, the Sustainability Appraisal within the Promotional Document concludes that the site has the potential to be extremely well related in terms of public transport provision, particularly rail, together with local amenities such as schools, doctors and supermarkets. The Supporting Statement produced by Dove Haigh Phillipps and included at Appendix 1 of this Statement also provides compelling evidence as to why the Site should be released from the Green Belt. Accordingly, the Esholt Site should be identified as a

potential Green Belt deletion in order to make best use of previously developed land, which is a key overall priority of the Core Strategy.

31. Our Client is concerned that whilst the Growth Assessment pertains to be sufficiently comprehensive to identify small and medium scale changes to the Green Belt, it is not a strategic review of the Green Belt. Based upon the 'Potential Localised Green Belt deletions' identified on the Key Diagram, the Growth Assessment is not sufficiently detailed enough to identify broad areas or explicit locations where Green Belt will be released. Furthermore, the Growth Assessment arbitrarily applies a 500m cut off beyond which sites are considered to be unsuitable for Green Belt release on the basis of being 'significantly detached' from the existing settlement. This approach fails to take account of the availability of sustainable brownfield sites such as our Client's Site, outside the 500m boundary which have the potential to offer other sustainability benefits.



**Appendix 1  
Employment Land Supporting Statement**

**Bradford Core Strategy Examination in Public  
Supporting Statement**

Relating to:

**Land at the Esholt Estate  
Bradford  
West Yorkshire**

Prepared by

**Dove Haigh Phillips**

20<sup>th</sup> February 2015

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## **1.0 Qualifications and Experience**

- 1.1 Dove Haigh Phillips are a firm of Chartered Surveyors specialising in the commercial property market in the North of England market, specialising in sites located in West Yorkshire.
- 1.2 The firm was established in 2006 and all of the partners were formerly operating out of the Leeds Office of Knight Frank.
- 1.3 Dove Haigh Phillips advise owner managed businesses, publicly quoted companies, public bodies, property companies, banks and other financial institutions on the viability, procurement and appraisal of commercial development land and property.
- 1.4 In particular, the firm has advised on the development, letting, sale and acquisition of a wide number of commercial sites and buildings and development land of varying size and purpose throughout the Bradford property market over the past 5 years. We consider that this is particularly relevant due to the change in market conditions and dynamics which have influenced this sector of the property market which is specifically relevant to the subject site.
- 1.5 We therefore consider that we have the appropriate experience to provide an objective statement in support of the proposals for the subject site as an essential high quality mixed use commercial development opportunity in the Bradford property market.

## 2.0 Background

- 2.1 The Esholt Estate comprises an operational Waste Water Treatment Works owned by Yorkshire Water together with adjacent redundant operational land comprising former filter beds and tanks owned by Keyland Developments Limited (hereafter referred to as the Esholt Site).
- 2.2 The existence of the Esholt Estate 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.
- 2.3 Significant investment (in the region of £100M) in new technology from Yorkshire Water has rendered the former filter beds and tanks as redundant structures on the developed part of the site which largely comprise historic concrete / brick former sewage works. As such, the release of this land from its former use represents a unique opportunity for the new economy of Bradford which would not be available without the historic commitment to the land assembly of this site with the urban area by Yorkshire Water.
- 2.4 As the emerging release of the Esholt Site has become apparent, the landowner, Keyland has started the progress proposals to redevelop the site for beneficial future use.
- 2.5 Written representations to the Core Strategy have been previously made by Barton Wilmore which provide a comprehensive background including detail on constraints and opportunities and a basis for the future strategy of the entire site. The written representations submitted in 2014 together with the associated Promotional Document clearly identified a vision for a high quality development in a sustainable location, and this was assessed against the Bradford Core Strategy and the exceptional circumstances to release it from the Green Belt.
- 2.6 As part of the Examination of the Bradford Local Plan Core Strategy, a Schedule of Matters, Issues and Questions for Examination have been raised some of which are relevant to the Esholt site.
- 2.7 This report seeks to demonstrate that the Esholt Site is very much suitable for employment development as part of a comprehensive mixed use scheme. The analysis of the site has regard to the site characteristics, relevant planning policy, competing sites, existing allocations, and current property market conditions.

- 2.8 Where appropriate and relevant, certain information within this document does include extracts from the original representation document in respect of the site, in order that this report can be read with a comprehensive structure.

### 3.0 Site Characteristics

- 3.1 The Esholt Site is located to the east and south east of Esholt village and north of Apperley Bridge. The settlements of Baildon and Rawdon are also located within proximity of the site, whilst Bradford City Centre is located approximately 4.5 miles to the south west.
- 3.2 Esholt itself is located in the north east part of the the Bradford District, and is well located in relation to existing transport routes including the A6038 (Hollins Hall) to the north which provides access to Shipley and Bradford City Centre and the A658 (Apperley Lane) which provides access to Leeds Bradford Airport which is located approximately 3 miles to the north east.
- 3.3 There are two vehicular accesses to the site, via Station Road in Esholt and via The Avenue to the south which is located off the A658. The site has its own existing unique private roadway connecting both of the major routes.
- 3.4 The Apperley Bridge railway station and associated park and ride facility is currently under construction and is due to be in operation this Summer. The railway station is directly connected to the Esholt Estate via a pedestrian bridge over the rail line to the south of the Esholt Estate. The rail services will offer direct connections to Leeds, Bradford and a number of intervening stations thus providing a fast track Shipley – Leeds link and represents half of a £20m investment in two new rail stations in the region.
- 3.5 The principal component of the site comprises of two substantial areas of filter beds and tanks that are redundant and no longer form part of the operational treatment works. The filter beds are linked by a woodland known as Gill Wood, and there are several other woodlands located adjacent to the boundary which provide screening of the site within the immediate proximity in addition to landscaping that has been incorporated along the south western boundary of the site. The site is located within the valley bottom and land to the north and east rises relatively steeply.
- 3.6 Whilst the Esholt Site is located within Green Belt, the area occupied by the redundant filter beds comprises two significant areas of previously developed land which are currently designated within the RUDP as major developed sites within the Green Belt. The area occupied by both the north and south filter beds extends to approximately 29.06 ha, and represents the potential for a unique development platform due to the level topography in this location. (The entire Esholt estate extends to approximately 227 ha (560 acres)).

- 3.7 A number of former redundant and dilapidated farm buildings on the Esholt Estate (to the north west of the filter beds) have previously been refurbished and renovated to provide high quality business space. The development, known as Home Farm extends to just under 20,000 sq ft of bespoke office space and has attracted 10 regional businesses to this location, which demonstrates commitment from local employers to Esholt.
- 3.8 The whole site has a legacy of investment in a world class utility operation from many years of investment and planning which has now evolved leading to the availability of the redundant filter beds for a major unrivalled employment opportunity in the Bradford District.
- 3.9 A site plan is attached at Appendix 1.



## 4.0 Planning Policy Relevant to the Site

### The Core Strategy Policy and Vision

- 4.1 The spatial vision for the Bradford District as proposed by the Core Strategy seeks to recognise and promote Bradford as a dynamic location for housing and employment growth. Specifically in respect of the growing economy, it will be essential for the Core Strategy to support this via a wide range of high quality employment opportunities throughout the District via inward investment of promotion of suitable sites to accommodate new development.
- 4.2 Within the hierarchy of the Core Strategy, the Esholt Site is located within the north eastern area of the City of Bradford and is therefore situated in a sustainable location for new development. Policy BD1 of the Core Strategy identifies the site as a new employment opportunity comprising a high quality research and development led technology park. This is complemented by the Spatial Vision Diagram which identifies the site as a strategic location for a new business park.

### Existing Designation

- 4.3 Under the Bradford Replacement Unitary Development Plan (2005), The entirety of the Esholt site is located within the Green Belt and the two filter bed areas are specifically designated as a major developed site within the Green Belt under Policy GB6A. The majority of woodland areas located adjacent to and partially within the site are designated as Sites of Local Conservation Interest under Policy NE9 of the RUDP.

### The Requirement For New Employment Land

- 4.4 The Core Strategy has identified a requirement of 135ha of Employment Land within the District over the plan period. The land should be delivered as follows;
- City of Bradford – 100 ha
  - Airedale Corridor – 30 ha
  - Wharfedale Corridor – 5 ha

4.5 The delivery of new Employment Land through the District will be from the following supply;

- Unimplemented Sites allocated within the UDP
- Committed Sites with planning permission
- Sites identified in existing regeneration strategies for Bradford city centre and Airedale
- Sites identified in current and emerging masterplans including that for the Shipley and Canal Road Corridor City Plan for Bradford City Centre and Leeds Bradford Corridor, and;
- New Sites including high quality employment locations such as North Bradford tied to the locational benefits of the proximity to Leeds Bradford International Airport and Apperley Bridge Rail Station.

As part of the Examination of the Bradford Local Plan Core Strategy, Matter 5 'Economy and Jobs' the Inspector raises questions around the Council's economic strategy and policies including the provision and distribution of employment land.

#### Green Belt Policy Implications

4.6 Under Strategic Core Policy 7 within the emerging Core Strategy, it is acknowledged that in order to meet longer term housing and the employment growth requirement for the District, there will need to be a release of land from the Green Belt. This is due to a lack of a suitable supply of previously developed land and Greenfield land situated within existing settlement boundaries.

4.7 The approach to the release of Green Belt land is proposed to be achieved through a selective review which will come forward through the Allocations DPD. In particular, Policy EC3 acknowledges that Green Belt release will be necessary in order to provide adequate opportunity for employment growth.

4.8 The release of Green Belt land must be assessed against five criteria for the purpose of including land in Green Belts as identified within NPPF –paragraph 80, as follows;

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns, and;
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 4.9 An analysis of the Esholt Site in respect of the five purposes above has been undertaken by Barton Wilmore and the conclusion of the analysis states that overall, the site offers 'limited to some' contribution to the function of the Green Belt. However, the site comprises a significant element of brownfield land and is visually well contained with clearly defined boundaries. The area identified for new employment development is within the existing area of brownfield land, and this would not impact on the existing defined boundaries, nor would it impact on any existing woodland. Furthermore the development could provide opportunities for enhancement of the existing green infrastructure.
- 4.10 As part of the Examination of the Bradford Local Plan Core Strategy, the issue of releasing Green Belt land has raised as part of the Schedule of Matters, Issues and Questions for Examination. This includes a response to the following;
- a) Is the proposed approach to the Green Belt appropriate, effective, , positively prepared, justified, soundly based and consistent with the latest national policy (NPPF 84) particularly in terms of;
    - i) identifying the exceptional circumstances necessary for using Green Belt Land;
    - ii) demonstrating the need to promote sustainable patterns of development, including the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (NPPF 84)
  - b) Whether there should be a full or selective review of the Green Belt, and would such a review be coordinated and agreed with neighbouring authorities?
  - c) What evidence is available to justify decisions to release particular areas of Green Belt for development?
- 4.11 In summary, the Core Strategy has a clear vision for promoting new employment opportunities within the Bradford District. The amount of land required in order to fulfil this vision over the course of the plan period is 135 ha. It is therefore imperative to identify sites which can meet this requirement.
- 4.12 Although the Site is within Green Belt, a significant part of it comprising the redundant filter beds are previously developed brownfield land and the Site is visually well contained with clearly defined boundaries..

- 4.13 The Core Strategy acknowledges that the release of land from existing Green Belt designations should be facilitated in order to bring forward new opportunities for economic growth. This will be done through the allocations DPD and subject to assessment.
- 4.14 This document seeks to provide evidence in order to assist in addressing the points raised by the Planning Inspector in respect of the Economy and Jobs and the approach to the Green Belt..

## 5.0 Market Conditions

### Economic and Financial Overview

- 5.1 The UK economy has moved out of recession and the widespread problems affecting the commercial property market have now largely subsided. As a result, current market sentiment from occupiers and developers has improved and it is now becoming evident that the levels of demand for quality employment sites and new accommodation are improving, with a return to development and commitment to new buildings throughout the West Yorkshire region.
- 5.2 Bank base rates remain at a historical low of 0.50%, and although the availability of development funding remains lower than at the height of the commercial property market in 2006, lenders are prepared to provide facilities for new development. However, it is evident that funding for new development is reliant on high quality / prime sites and development proposals.
- 5.3 Business failures which were particularly evident in the period of 2009 - 2011 have stabilised and general sentiment from occupiers has becoming more positive as set out above. There is no longer a significant over supply of accommodation which was evident in the period following the market crash post 2007 and this has contributed to improved levels of activity in the commercial property sector.

### Occupier Demand

- 5.4 The market for employment buildings has evolved significantly since the late 1990s. Many occupiers traditionally associated with this sector have restructured their strategy for property occupation in line with changing market dynamics, on both a national and international scale and also with regard to the working environment for employees, This also encompasses environmental / energy efficient accommodation and high quality of space in order to attract and retain an enthusiastic and reliable workforce.
- 5.5 The factors associated with property occupation including, quality of design and environment, fluidity of logistics, efficient labour pool and general economies of scale have becoming increasingly important in a competitive market where businesses seek to maximise efficiency of all resources.

- 5.6 Whilst the existing motorway corridor locations are the traditional areas which will cater for continued development of single distribution units of 100,000+ sq ft, new business locations outside of the motorway corridors are more than capable of delivering high quality employment buildings suitable for occupiers requirements at a lesser scale of size for medium and smaller sized companies.
- 5.7 Therefore, in addition to the prime (and most expensive) sites, other employment locations have also been able to attract occupiers, due to different influencing factors which seek to provide a balance of factors including include proximity to workforce, and costs of occupation and operation. This has included areas such as the Bradford District which is well regarded as an location which has a number of highly regarded companies with either national or regional headquarter presence including Morrisons, Hallmark Cards, Santander and Kelda Group to name a few.
- 5.8 Occupiers are attracted to Bradford due to the availability of an economic labour pool and perception of good value for leasehold and freehold property terms. Now that the commercial property market has returned to a more traditional method of operation, it is anticipated that this influence will continue in the foreseeable future.
- 5.9 Occupiers will seek to achieve market terms which reflect the size and specification of accommodation required with these six key criteria:-
- i) Proximity to affordable labour pool and markets.
  - ii) Strong communication links for goods/HGVs and workforce, and access to national road network.
  - iii) A high profile environment including proximity to similar quality property and efficient infrastructure and naturally advantageous topography and security.
  - iv) An efficiency of design to embrace new technologies with full consideration given to the cost of operation for more factors influencing occupation and function of the property.
  - v) The initial cost of the development and/or ongoing operational costs.
  - vi) Certainty of delivery including the availability of planning and timing.
- 5.10 Therefore, in order for development to succeed, any particular site must therefore have the ability to satisfy the above criteria.

- 5.11 Demand for Bradford as employment location was given significant confidence despite the property market downturn by the commitment from Marks and Spencers to develop a new 1,000,000 sq ft distribution building at Rooley Lane, on the site of the former West Bowling Golf Course in 2008-2009. More recently, P&B Foods committed to this location with the acquisition of 12 acres of land for a new food importing business which will create up to 50 new jobs.
- 5.12 In particular, a new employment park which has recently been promoted within Bradford is the Baildon Business Park, which is in close proximity to the Esholt Site, in the Shipley area of the District. The park comprises approximately 13 acres (9 acres net developable) and development is now progressing by Russell Construction and Pendle Projects on land owned by Bradford Council. The site has a frontage to the A6038 Otley Road, which links Guiseley to Shipley and has planning approval for B1, B2 and B8 uses.
- 5.13 The site shares a number of similar characteristics to Esholt, principally in terms of location, availability to a suitable workforce and a desire to create a high quality new business environment. The new accommodation proposed for the site ranges in size from 5,000 sq ft - 25,000 sq ft with appropriate levels of car parking and external areas. The principal features of this development are as follows;
- An attractive landscaped environment
  - Buildings with eaves height to 11m
  - Good sized yard areas
  - Good transport links
  - High design content
  - Built to BREEAM “very good”
- 5.14 The main source of demand has been from occupiers seeking freehold accommodation in this location, and largely relocating from outdated space within a 10 mile radius. The occupiers who have committed to this site include Projumax (25,000 sq ft) a company in the aerospace sector based in Otley; Annetia (10,000 sq ft) producing medical / surgical products, and relocating from Guiseley; a local manufacturing company based in Shipley who are relocating into a new 10,000 sq ft unit; and finally another Shipley based company in the healthcare sector relocating to a unit of 5,000 sq ft.
- 5.15 The site has capacity for a total of 160,000 sq ft and at present only 3 units remain available which shows the return of confidence to the market and also this is confirmed evidence of demand for this area of the Bradford District as an employment location.

Land Supply

- 5.16 An Employment Land Review was initially commissioned in February 2007 by Bradford City Council, which was undertaken by third party consultants; Arup and DTZ.
- 5.17 The Employment Land Review comprised a number of elements including an overview of the economic structure of the district, an assessment of Employment Land Supply in the district, an assessment of projected demand for employment over the plan period, together with a review of market and property trends and other relevant data.
- 5.18 At the time of the initial report, a total of 123 hectares of land were identified and subjected to qualitative assessment against a number of criteria.
- 5.19 Following submission of the original report, the property market entered a period of significant change, in line with the wider UK recession and therefore an Employment Land Review Update was commissioned which was published in October 2011.
- 5.20 There have not been any further formal reports commissioned, although Bradford Council maintain an Annual Monitoring Report with the most recent data from 2014.
- 5.21 In the Core Strategy Background Paper: 3. Economy and Jobs; February 2014, the Council identified that 107.68 ha of employment land remained undeveloped from the existing employment sites allocated within the Replacement Unitary Development Plan of 2005. This was based on data from 1 April 2013 (Annual Monitoring Report).
- 5.22 The analysis of this data showed that there were a total of 49 sites of varying size and quality located across the district.
- 5.23 The analysis of the sites by size relevant to data as at 1 April 2013 was as follows;
- 25 Sites less than 1 ha
  - 18 Sites between 1 – 5 ha
  - 6 Sites greater than 5 ha
- 5.24 The availability of land was further broken down between areas for Bradford North, Bradford South, Bradford West, Keighley and Shipley.



- 5.25 The current supply of available land in Bradford was therefore analysed to show predominantly small sites to accommodate new local demand, generally as infill opportunities or expansion land for existing employers. There are only a handful of sites which could be considered as strategically important and it is acknowledged that this represents a challenge in bringing the land forward for immediate availability to meet modern business demands.
- 5.26 In addition to the allocated land, the Council's Employment Land Register, also contains a number of unallocated employment sites which have planning backing through the granting of permission for business uses. This represents a further 8 sites although providing a total of only another 7.08 ha.
- 5.27 We have also reviewed a copy of the Council's Annual Monitoring Report as at 1 April 2014 which we understand represents the most up to date information. At face value, this shows 106.68 ha of available employment land, although we are aware that there have been a number of market changes since this data was compiled and this is addressed within Section 6 of this report.
- 5.28 A copy of the 2014 Annual Monitoring Report is attached at Appendix 2.

## 6.0 Analysis of Available Sites

- 6.1 In order to assess the availability of the supply of employment land within the Bradford District, data has been considered from Bradford Councils latest Annual Monitoring Report dated 1<sup>st</sup> April 2014. This data lists all available and allocated employment sites within the District. In addition we have made further enquiries and used our own market knowledge to undertake further analysis of relevant data.
- 6.2 Throughout this research, 47 employment sites have been identified. This provides a wide range of land in terms of scale, which although policy compliant does not necessarily mean it is currently available or capable of delivering new supply of accommodation due to constraints and other factors.
- 6.3 The sites have therefore been sifted to eliminate those which are not considered suitable or capable of delivering new high quality employment space. The first stage of the review confirms that as previously identified in the Employment Land Report, the majority of land in the District is considered small scale suitable for infill development, or expansion.
- 6.4 We have set out market requirements for employment accommodation in Section 5 of this report. In order to satisfy the vision of the Core Strategy for new high quality employment space, have undertaken analysis of sites which have been included in the Annual Monitoring Report which are over 5 hectares (12.35 acres). This is because, in order to deliver the Core Strategy vision for high quality employment land, it will be necessary for development to be procured on sites which can meet the criteria set out in Section 5.9 of this report. We consider that 5 hectares is a minimum land size as a critical mass in order to provide the economies of scale for a suitable scheme for both occupiers and developers.
- 6.5 According to the initial analysis of the 2014 data, 6 sites have been identified which are allocated for employment and are over 5 hectares in size. These sites are as follows:-
- i) E/BN/26/0023/00 – Site at Woodhall Road (rear of Gain Lane, Thornbury, Bradford) – 9.85 ha
  - ii) E/BS/25/0019/00 – Land at West Bowling Golf Course (ProLogis Park) – 13.16 ha
  - iii) E/BS/30/0002/00 – AH Marks Works, Wyke Lane – 5.42 ha
  - iv) E/BW/23/0003/00 – Land at Thornton Road, Thornton Village – 6.68 ha
  - v) E/KY/16/0001/00 – Beechcliffe (A629) – 9.54 ha
  - vi) E/SH/01/0004/00 – Land at Buck Lane (Otley Road), Baildon – 6.31 ha

- 6.6 On the face of this first stage analysis, it is apparent that there are approximately 51 hectares (gross) of deliverable sites that could satisfy demand for prestige new employment land in the Core Strategy with site areas in excess of 5 hectares.
- 6.7 However, since the publication of the data as at 1<sup>st</sup> April 2014, we are aware of 2 notable changes to the availability of this land. These are as follows:-
- i) Land at West Bowling Golf Course (ProLogis Park). All of the land which was identified as remaining in 2014 has now been committed. This includes a significant part of the 13.16 ha to P&B Foods for the development of a food production unit and a second smaller piece of land has been sold to a developer for the procurement of small starter units. There is no remaining land for employment use on this site (although starter units will be developed on the small site which has just sold).
  - ii) Land at Buck Lane (Otley Road), Baildon. Since the collation of data for the 2014 Annual Monitoring Report, development is underway on this site and a significant amount of the availability (we understand over 50%), has either been committed or is under offer to occupiers. This reduces the available amount of land on this site to just over 3 ha and it is likely that this will be taken up in the near future.
- 6.8 This therefore leaves the following 4 sites to consider, with analysis of each below:-
- i) E/BN/26/0023/00 – Site at Woodhall Road (rear of Gain Lane, Thornbury, Bradford) – 9.85 ha
- 6.9 This backland site extends to 9.85 ha and is situated at the rear of two fully developed sites, one occupied by Morrisons and another a bakery which front Gain Lane. The site is currently significantly constrained by an acceptable lack of main road access and this is a major inhibiting factor for the future development of this site. It is regarded as a long term land opportunity, but there are no obvious prospects of development or indeed the ability to develop this site in the short – medium term, unless taken by one of the adjacent occupiers for their own expansion.
- ii) E/BS/30/0002/00 – AH Marks Works, Wyke Lane – 5.42 ha
- 6.10 This is an existing site which was carried forward from the 1998 adopted plan. It is Greenfield and is situated to the east of the AH Marks Chemical Works. The designation of this site is to allow further expansion of the factory away from the main urban area and this site would not be regarded as satisfying the demand for the vision of the Core Strategy; it is adjacent to an existing heavily regulated chemical works and has been earmarked for expansion of this use.

iii) E/BW/23/0003/00 – Land at Thornton Road, Thornton Village – 6.68 ha

- 6.11 This is also a site which has been carried forward from the 1998 adopted UDP. It is a parcel of Greenfield land attached to the western end of Thornton Village and formerly in agricultural use. A public footpath and watercourse run through the site and there is high voltage power line crossing the land. A significant amount of soft landscaping would need to be undertaken in order to facilitate any development and an improved access will also be required. We are not aware of any active marketing or promotion of this site and we note that none of this land has been previously developed. We consider it to be in a remote location and there are likely to be a number of challenging enabling works required to bring the land forward for development.

iv) E/KY/16/0001/00 – Land at Beechcliffe (A629) – 9.54 ha

- 6.12 This site is an amalgamation of four sites also carried forward from the 1998 adopted UDP. It represents a combination of brownfield/greenfield land on the edge of the urban area. However, out of the 9.54 ha, only 5.41 ha of land is available for development as the remaining 4.07 ha is categorised as functional flood plain. The site may also be contaminated. Although the site has a prominent location adjacent to the A629 there is a lack of access. In summary, this site has a number of issues which represent significant constraints to development.
- 6.13 Therefore, following analysis of the potential availability of key sites in excess of 5 hectares, the true analysis shows very little real availability or potential for development from sites identified for the Employment Land Review, and updated for the purposes of the Annual Monitoring Report 2014. The current analysis of this data therefore shows a critical lack of opportunity from existing allocations.
- 6.14 With the result of this analysis, it is clear that significant scope remains for bringing forward new land allocations with clear potential to provide a much needed employment space identified by the Core Strategy.
- 6.15 The demand for employment land in the district has been clearly demonstrated within the past 12 months. This is both from the commitment by P&B Foods at Pro-Logis Park and also a multitude of occupiers at Baildon Business Park; following anticipated take up of the remainder of this space there will remain very little land to bring forward for new development.

## 7.0 Assessment of the Site

- 7.1 The suitability of the site is now assessed in terms of its market appeal having regard to its suitability for employment use which is driven by the demand of current occupier requirements and its own unique special characteristics.
- 7.2 Section 6.14 of this report identifies the key criteria necessary for occupiers to make strategic decisions for their employment occupation / property requirements. These are now addressed directly in respect of Esholt.

### Assessment of the Site

- 7.3 The six key criteria in relation to the subject site are as follows;

#### 1. Proximity to affordable labour pool and markets.

- 7.4 The site has ready access to labour and markets. It is located in an area of the Bradford District which would provide prospective employers with the confidence to know that a ready workforce would be available due to its proximity to the local residential population. The site is surrounded by areas of dense population which already support many successful and expanding businesses.

#### 2. Strong communication links for goods / HGV's and workforce and access to national communication links networks.

- 7.5 As demonstrated by recent developments, demand from indigenous companies seeking high quality accommodation already exists in this location. This is currently evidenced by the demand and new development which is underway at Baildon Business Park only a short distance from Esholt. As identified under point 1 above, the site has excellent proximity to a suitable labour pool.
- 7.6 The site occupies a commercially attractive and improving location within the Aire Valley between Leeds and Bradford city centres in the heart of the Leeds City Region. The site is particularly well connected to Leeds Bradford Airport which offers rapidly increasing access to UK and European cities on a daily basis. The new Apperley Bridge rail station is now under construction immediately to the south of the site and due for completion in 2015. The new station will offer a rapid access to Leeds and Bradford city centres. A comprehensive road

improvement scheme along Harrogate Road is proposed which will also enhance access to this area of Bradford and the ring road.

3. A high profile environment including proximity to similar quality property and efficient infrastructure and naturally advantageous topography and security.

- 7.7 This is one of the key unique characteristics of the site; it has the ability to generate one of the highest, if not the highest quality environment in the Bradford District due to its scale, highly attractive Parkland setting and the large natural development platforms already created by the redundant filter beds. There are extremely limited opportunities elsewhere to provide this environment without significant ground works.

4. An efficiency of design to embrace new environmental technologies with full consideration given to the cost of operation from all factors influencing occupation and function of the property.

- 7.8 The quality of location and immediate setting will encourage the design, development and occupation of high quality buildings which embrace new environmental technologies. This is further reinforced by the step change interest in environmental technology already made by Kelda Group in its adjoining and retained site which has facilitated release of this opportunity.

5. The initial cost of the development and / or the ongoing operational cost.

- 7.9 There are no prohibiting economic factors which would prevent a building being offered to the market on competitive terms. The economies of scale for developing out a site with a suitable critical mass of development is a vital factor in ensuring that economically sustainable development can be delivered. This is a major advantage over smaller sites where costs are exponentially higher.

- 7.10 The filter beds are currently being removed to create an underlying plateau for viable development with a minimum of ground works necessary.

6. Certainty of delivery – timing.

- 7.11 The site has a unique quality of being within a single ownership of a large stable company holding a proven track record of delivery of large commercial sites. This significant factor ensures certainty of delivery if the site is allocated for employment use and planning permission is granted. Land assembly is often one of the most difficult aspects of the initial stages of development and can often stall or halt progress indefinitely.

- 7.12 Looking at the characteristics of the Esholt site, it has the unique ability to deliver with certainty on all of the key criteria above. This is perhaps the most important factor – it can deliver.
- 7.13 Although at face value, the evidence of available employment land within Bradford shows an aggregate area of 51 hectares (sites 5 ha +), this data has limited value when it is analysed in greater detail. Small sites may be suitable for limited infill but they are rarely appropriate for the promotion of a district as an 'Economic Growth Area', and this is what is proposed by the Core Strategy. In simple terms, there is not only market demand but also a necessity for sites with a critical mass of development. This is a factor desired by occupiers and required by developers in order to sustain economic development.
- 7.14 The site has the ability to deliver a quality design of buildings with regular plot sizes and layouts suitable for current requirements. The site also has adequate capacity to accommodate flexibility in design of buildings.
- 7.15 There are no constraints from either a topographic or economic perspective which would prevent commencement of development in a short timescale and the site can be developed on a phased basis with the ability to deliver throughout the plan period.
- 7.16 As identified in this report, notwithstanding the fact that the Esholt site has significant advantages over other sites, even if these are promoted for development, competition, or choice, is a positive consideration to promote a healthy market response.

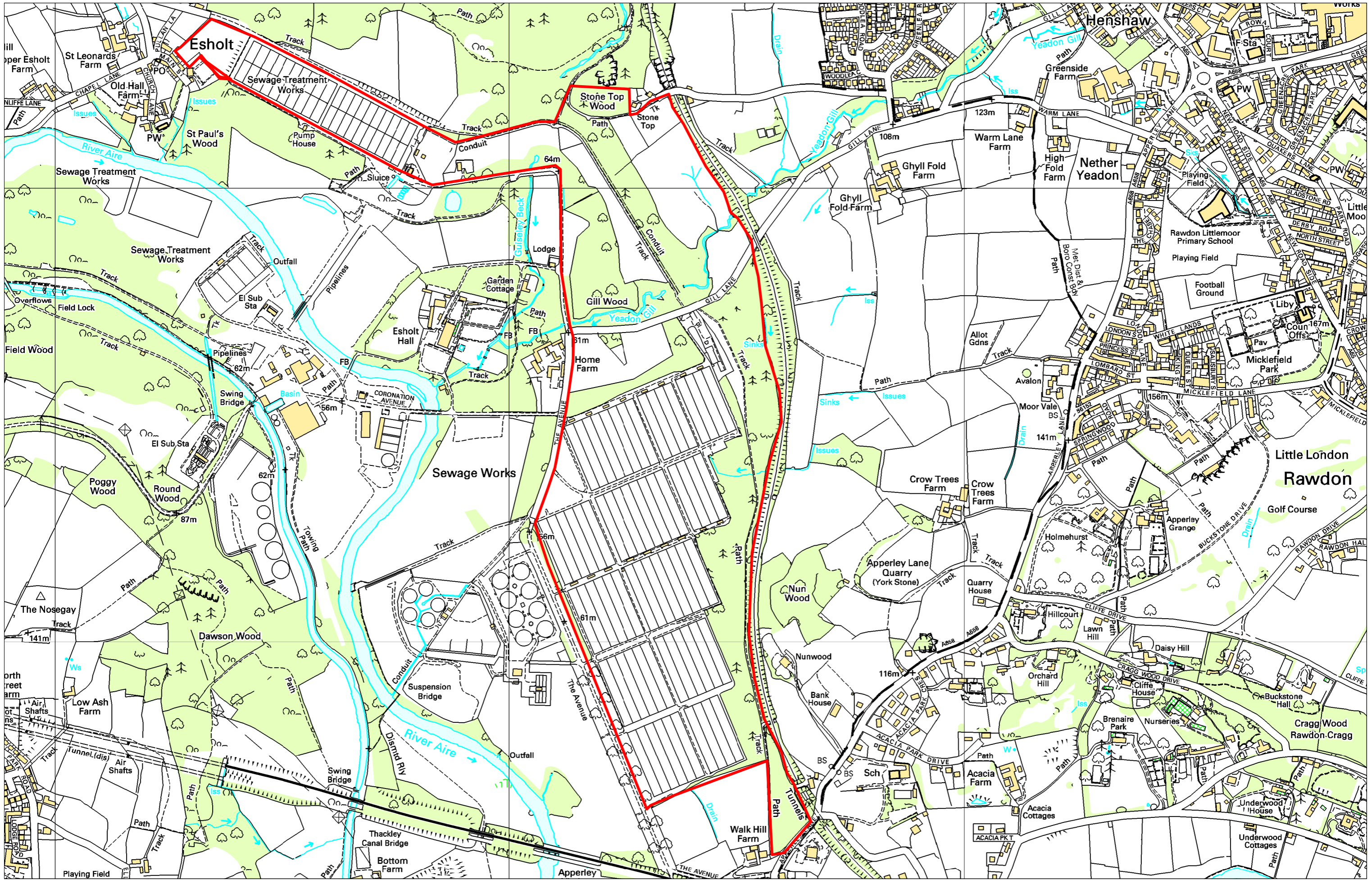
## 8.0 Summary and Conclusions

- 8.1 Over the past 10 years, the Bradford District has been subject to the challenges of recession, and the general trends of the UK commercial property market. A significant amount of accommodation in Bradford is outdated, however, renewed confidence in the property market has started to have become evident with an increase in market activity.
- 8.2 Notwithstanding the effects of the recession, Bradford secured Marks and Spencers to Pro-Logis Park at the head of the M606 in 2008 – 2009 for a new 1,000,000 sq ft distribution hub and more recently has attracted P&B Foods to a 12 acre site on the same park.
- 8.3 Beyond the motorway corridor locations, Baildon Business Park in Shipley has attracted a good level of demand from local companies seeking to relocate to new accommodation in the District. Development is on site and only a few buildings remain. The development of this space has been at sustainable levels and has gone a long way to promote confidence in the region.
- 8.4 The key to the success of the development at Pro-Logis Park and at Baildon Business Park has been the ability to develop sites with sufficient critical mass to facilitate economic development and also to attract occupiers to new business locations. If Bradford is to progress and deliver its vision for Economic Growth, it is essential to release sites with a critical mass big enough to meet this vision. Based on our analysis of the existing employment land supply, there is very limited choice, with the exception of the Esholt site in order to deliver a high quality employment location which will meet the requirements set out in the Core Strategy. We therefore consider it is essential to ensure that the site can be released for development.
- 8.5 The Core Strategy sets out a target of 135ha of employment land of which 100ha is within the City of Bradford, within which the Esholt site is located. Despite the identification of over 100ha of land within the District, much of this is poor quality, and the majority of this is small scale. Our analysis of sites shown which are identified as over 5ha has actually shown that there is extremely limited supply of suitable land. All things considered, we are therefore not aware of any other sites which can deliver the vision of the Core Strategy, either from the perspective of scale or with the backing of an organisation with the intent to deliver.
- 8.6 The Esholt site is a unrivalled opportunity for step change in quantity and quality for employment land within Bradford, and this has arisen recently following major capital investment by Kelda Group, the site owner in new environmental technology.



- 8.7 The programme for removal of the filter beds now underway, is creating natural underlying plateaux for development within the single ownership of a well resourced site owner who has a proven track record of delivering development.
- 8.8 The site is currently being enhanced further by construction of the adjacent Apperley Bridge station and road/car park infrastructure which links to Harrogate Road.
- 8.9 With excellent access to the airport, at the heart of densely populated West Yorkshire conurbation, the site is in close proximity to many successful businesses and a large workforce including decision makers.
- 8.10 Today, the Esholt site presents a unique high quality employment opportunity for the City of Bradford which is unrivalled by any other site and can deliver to provide the vision of the Core Strategy, and we therefore consider that these factors demonstrate credible reasons for release from the Green Belt.

## Appendix 1: Site Plan



Date Requested : 26/11/2013, 15:32:59  
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 Scale : 1:7500

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The position and depth of any YW apparatus shown on this map are approximate only.

**Appendix 2: Employment Land Annual Monitoring Report Data 1<sup>st</sup> April 2014**

SiteRef	UDPRef	SiteAddress1	DevelopmentStage	BASEDATE	TotalSiteArea	DevelopedSiteArea	Remaining 2014	SiteStatusDescription
E/BN/05/0029/00	BN/E1.3	BIRCH LANE	PARTIALLY DEVELOPED		1.85	1.31	0.35	AVAILABLE
E/BN/05/0033/00	BN/E1.6	Steadman Street	UNDEVELOPED	01/04/2011	0.43	0	0.43	AVAILABLE-NO CONSTRAINTS
E/BN/05/0045/00	BN/E1.1	Neville Road	UNDEVELOPED	01/04/2011	1.17	0	1.17	AVAILABLE-NO CONSTRAINTS
E/BN/06/0004/00	BN/E1.11	Dick Lane	UNDEVELOPED	01/04/2011	0.55	0	0.55	AVAILABLE-NO CONSTRAINTS
E/BN/12/0005/00	BN/E1.14	Harrogate Rd, Greengates	UNDEVELOPED	01/04/2011	2.55	0	2.55	AVAILABLE-CONSTRAINTS
E/BN/26/0023/00	BN/E1.17	Woodhall road	UNDEVELOPED	01/04/2011	9.85	0	9.85	AVAILABLE-CONSTRAINTS
E/BS/10/0007/00	BS/E1.4	Brackenbeck Road	PARTIALLY DEVELOPED				1.57	AVAILABLE-NO CONSTRAINTS
E/BS/10/0009/00	BS/E1.2	Northside Road	UNDEVELOPED	01/04/2011	0.47	0	0.47	AVAILABLE-NO CONSTRAINTS
E/BS/10/0010/00	BS/E1.1	Ingleby Road	UNDEVELOPED	01/04/2011	3.25	0	3.25	AVAILABLE-CONSTRAINTS
E/BS/18/0005/00	BS/E1.7	Staithegate Lane, North	PARTIALLY DEVE	01/04/2011	12.18	7.7	4.48	AVAILABLE-NO CONSTRAINTS
E/BS/19/0001/00	BS/E1.9	BLACK DYKE MILLS	UNDEVELOPED	01/04/2011	2.39	0	2.39	AVAILABLE-NO CONSTRAINTS
E/BS/25/0001/00	BS/E1.12	Westgate Hill Street	UNDEVELOPED	01/04/2011	1.69	0	1.69	AVAILABLE-NO CONSTRAINTS
E/BS/25/0002/00	BS/E1.11	Cross Lane	PARTIALLY DEVE	01/04/2011	4.91	3.84	1.07	AVAILABLE-NO CONSTRAINTS
E/BS/25/0003/00	BS/E1.13	Cordingley Street	UNDEVELOPED	01/04/2011	0.49	0	0.49	AVAILABLE-NO CONSTRAINTS
E/BS/25/0017/00	BS/E1.14	Shetcliffe Lane	UNDEVELOPED	01/04/2011	0.96	0.4	0.56	EXPANSION
E/BS/25/0019/00	BS/E1.16	WEST BOWLING GOLF COURSE	PARTIALLY DEVE	01/04/2011	35.16	22	13.16	AVAILABLE-NO CONSTRAINTS
E/BS/25/0024/00	BS/E1.15	Burnham Avenue	PARTIALLY DEVE	01/04/2011	2.8	2.24	0.56	AVAILABLE-NO CONSTRAINTS
E/BS/30/0002/00	BS/E1.26	AH MARKS WORKS	UNDEVELOPED	01/04/2011	5.42	0	5.42	EXPANSION
E/BS/30/0005/00	BS/E1.21	Commondale Way	UNDEVELOPED	01/04/2011	0.46	0	0.46	AVAILABLE-NO CONSTRAINTS
E/BS/30/0011/00	BS/E1.24	New Works Road	UNDEVELOPED	01/04/2011	0.72	0	0.72	AVAILABLE-NO CONSTRAINTS
E/BS/30/0016/00	BS/E1.22	Staithegate lane, South	UNDEVELOPED	01/04/2011	2.87	0	2.87	AVAILABLE-NO CONSTRAINTS
E/BW/17/0009/00	BW/E1.3	Ripley Road	UNDEVELOPED	01/04/2011	0.82	0	0.82	AVAILABLE-NO CONSTRAINTS
E/BW/17/0008/00	BW/E1.5	Ripley Street Bowling Road	PARTIALLY DEVELOPED		2.22	1.22	1	AVAILABLE
E/BW/23/0003/00	BW/E1.9	Thornton Road	UNDEVELOPED	01/04/2011	6.68	0	6.68	AVAILABLE-NO CONSTRAINTS
E/BW/27/0018/00	BW/E1.17	Princeroyd Way	UNDEVELOPED	01/04/2011	2.01	0	2.01	AVAILABLE-NO CONSTRAINTS
E/KY/08/0001/00	K/E1.7	Keighley Road, Silsden	UNDEVELOPED	01/04/2011	0.69	0	0.69	AVAILABLE-NO CONSTRAINTS
E/KY/08/0002/00	K/E1.9	Sykes lane	UNDEVELOPED	01/04/2011	2.39	0	2.39	AVAILABLE-NO CONSTRAINTS
E/KY/08/0004/00	K/E1.3	Station Road, Steeton	UNDEVELOPED	01/04/2011	0.56	0	0.56	EXPANSION
E/KY/08/0014/00	K/E1.6	Keighley Road(North), Silsden	UNDEVELOPED	01/04/2011	0.68	0	0.68	AVAILABLE-NO CONSTRAINTS
E/KY/13/0003/00	K/E1.11	Asklands Road, Ilkley	UNDEVELOPED	01/04/2011	1.03	0	1.03	AVAILABLE-NO CONSTRAINTS
E/KY/14/0005/00	K/E1.12	Aire Valley Road, Worth Village	UNDEVELOPED		0.68	0	0.68	AVAILABLE
E/KY/14/0008/00	K/E1.23	Bradford Road, Crossflats	PARTIALLY DEVE	01/04/2011	3.19	1.65	1.65	AVAILABLE-NO CONSTRAINTS
E/KY/14/0009/00	K/E1.16	East Avenue, Lawkholme	PARTIALLY DEVE	01/04/2011	1.85	1.25	0.6	EXPANSION
E/KY/14/0018/00	K/E1.15	Mitchell Street	UNDEVELOPED	01/04/2011	0.75	0	0.75	EXPANSION
E/KY/14/0024/00	K/E1.14	Aireworth Road, Worth Village	UNDEVELOPED	01/04/2011	1.73	0	1.73	RECYCLED
E/KY/14/0025/00	K/E1.13	Dalton Lane	UNDEVELOPED	01/04/2011	0.77	0	0.77	AVAILABLE-NO CONSTRAINTS
E/KY/16/0001/00	K/E1.18	Beechcliffe (adj Cemetery)	UNDEVELOPED	01/04/2011	9.54	0	9.54	AVAILABLE-NO CONSTRAINTS
E/KY/16/0006/00	K/E1.17	Holme Mill lane	UNDEVELOPED	01/04/2011	1.11	0.09	1.02	EXPANSION
E/SH/01/0004/00	S/E1.3	Buck Lane	UNDEVELOPED	01/04/2011	6.31	0	6.31	AVAILABLE-NO CONSTRAINTS
E/SH/02/0004/00	S/E1.9	Castlefields Lane	UNDEVELOPED	01/04/2011	0.67	0	0.67	AVAILABLE-NO CONSTRAINTS
E/SH/02/0006/00	S/E1.6	John Escritt Road	UNDEVELOPED	01/04/2011	0.92	0	0.92	AVAILABLE-NO CONSTRAINTS
E/SH/02/0012/00	S/E1.7	BINGLEY AUCTION MARKET	UNDEVELOPED	01/04/2011	1.76	0	1.76	AVAILABLE-NO CONSTRAINTS
E/SH/02/0013/00	S/E1.4	Dowley Gap Lane	PARTIALLY DEVE	01/04/2011	1.99	1.25	0.36	AVAILABLE-NO CONSTRAINTS
E/SH/02/0016/00	S/E1.8	Coolgardie	UNDEVELOPED	01/04/2011	3.8	0	3.8	AVAILABLE-NO CONSTRAINTS
E/SH/03/0003/00	S/E1.12	MANNYWELLS QUARRY	UNDEVELOPED	01/04/2011	4.28	0	4.28	AVAILABLE-CONSTRAINTS
E/SH/03/0004/00	S/E1.13	MANNYWELLS QUARRY	UNDEVELOPED	01/04/2011	0.94	0	0.94	AVAILABLE-CONSTRAINTS
E/SH/21/0009/00	S/E1.15	Dockfield Road 9adj Rail line)	UNDEVELOPED	01/04/2011	0.98	0	0.98	EXPANSION
<b>TOTAL</b>				01/04/2011			<b>106.68</b>	