

**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 5: ECONOMY AND JOBS*****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 Client's response to Matter 5, which covers the Economy and Jobs is contained in this Statement. The key issue highlighted by the Inspector is:

*“Does the Plan set out a clear, effective and soundly based economic strategy which positively and proactively encourages sustainable enterprise and economic growth, and are the policies for economic prosperity, rural economy, employment land, city, town, district and local centres appropriate for Bradford, supported by a robust, credible and up-to-date evidence base and consistent with the latest national policy?”*

7. Answers to all the questions posed by the Inspector must be put into the context of national policy and the economic and social problems facing Bradford.
8. The NPPF is strongly pro-growth and makes clear that this approach must be carried forward into Local Plans. Paragraphs 7 and 8 are unambiguous that facilitating economic growth is an essential part of sustainable development. Paragraph 18 says that the Government is “committed” to securing economic growth in order to secure jobs and prosperity. Paragraph 19 adds that the Government is also “committed” to ensuring the planning system does everything it can to support sustainable economic growth. It says planning should operate to “encourage and not act as an impediment to sustainable growth.” Paragraphs 160 and 161 deal with the implications for local plans, including very importantly making clear there is a requirement to address both quantitative and qualitative needs.
9. The Ministerial Announcement of September 2012 reinforces the overriding importance of the planning system facilitating economic growth. It says:

*“The Coalition Government’s number one priority is to get the economy growing. We must create the conditions that support local economic growth and remove barriers that stop local businesses creating jobs and getting Britain building again.”*
10. The emphasis on the need for the planning system to place a high priority on economic growth is particularly pertinent to Bradford because of its very severe economic and social problems. In 2010 Bradford was the 33<sup>rd</sup> most deprived authority out of 326 authorities in England (English Indices of deprivation 2010). According to Nomis figures, its residents also have high rates of unemployment (9.5%), worklessness (25% economically inactive) and low pay (£456.6 per week). There are encouraging signs that Bradford is beginning to turn round, but this should not disguise the magnitude of the need for continued high levels of economic development.
11. We consider below the relevant specific questions asked by the Inspector:

**Policy EC1 – Creating a Successful and Competitive Economy:**

**a) Is there sufficient evidence to justify the criteria and requirements for investment and planning decisions to deliver the particular economic benefits, as set out in the policy?**

12. The evidence underpinning Policy EC1 is substantial and includes the Regional Economic Strategy 2006-2015, Bradford Local Economic Assessment, Understanding Bradford District Report (2013), the 2011 ELR and Bradford District Retail and Leisure Study. Overall it is considered that this evidence base broadly justifies the criteria and requirements set out in Parts A to N of the Policy.

**b) Is the economic strategy appropriate, justified, effective, positively prepared, soundly based and consistent with the Leeds City Region LEP's economic growth strategy?**

13. The economic strategy set out in Policy EC1 supports the Core Strategy's vision and strategic objectives and is wide ranging. It seeks to support numerous economic sectors and build upon Bradford's existing economic strengths, as well as regenerating the City. Overall, it supports the desire for transformational change and promotes economic development and job creation and on this basis it is considered to be positively prepared and in accordance with the national pro-growth agenda. It is also considered to be consistent with Leeds LEP's Strategic Economic Plan (2014) which aims for the Leeds City Region to become the growth engine for the North and identifies Bradford as a strategic growth centre.

**c) Is the approach in line with national policy (NPPF/PPG)?**

14. As set out above, overall the economic strategy is considered to support economic growth and therefore accords with the principles set out in national policy.

**d) Does the policy give sufficient preference to supporting the rural economy, including agricultural and rural businesses, and to the tourism economy?**

15. Part M of Policy EC1 lends support to the diversification of agricultural and rural business. This subsection was added to the Policy at the Publication stage. Notwithstanding this, our Client considers that this part of the Policy could be further strengthened by making it clear that the Council supports new economic development that is sustainable in rural areas in line with the NPPF as follows:

**“M. Support sustainable economic growth, diversification and sustainability of agricultural and rural businesses.”**

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

**a) Is the basis of the proposed delivery of at least 2,897 jobs per year; is it justified by evidence and is it effective deliverable and consistent with the latest guidance (NPPF/PPG)?**

16. Our Client supports the proposed delivery of at least 2,897 jobs per annum in the Bradford district on the basis that it is required to achieve the overall ambitions and aspirations of the Core Strategy, and in particular to achieve greater employment levels of the district's residents. The rationale behind the 2,897 jobs figure is explained in the Economy and Jobs Background Paper. It comprises the increase in the working age population anticipated to be in employment at the end of the plan period (27,800 based on the 2010-based sub national population projections), together with those projected to be on Job Seekers Allowance (21,464 based on the 2010-based sub national population projections) which provides a new jobs demand of 49,264. This equates to an average of 2,897 jobs per annum between the 2011 to 2030 period.
17. The proposed jobs figure is considered to be ambitious, but deliverable, and is consistent with national policy, in particular the NPPF which is strongly pro-growth and makes clear that this approach must be carried forward into Local Plans. As set out above, paragraphs 7 and 8 of the NPPF are unambiguous that facilitating economic growth is an essential part of sustainable development. Paragraph 18 says that the Government is “committed” to securing economic growth in order to secure jobs and prosperity. Paragraph 19 adds that the Government is also “committed” to ensuring the planning system does everything it can to support sustainable economic growth.
18. In addition the proposed jobs figure is considered to be consistent with the Leeds LEP's Strategic Economic Plan (2014). The figure strikes a sensible balance between the scenario of continuing high unemployment levels and full employment over the plan period.

**b) What is the relationship between the delivery of 2,897 jobs per year and the housing target supporting some 1,600 jobs/year?**

19. Currently there is a mismatch between the housing target and the jobs growth target within the Core Strategy. Our Statement to Matters 4A and 4E cover this issue in further detail.

**c) How will this number of jobs actually be created and delivered?**

20. The Core Strategy seeks to build on the District's established strengths, key sectors and other key assets to promote inward investment and business opportunities leading to job creation. As referred to in Dove Haighs Phillips supporting report at Appendix 1, the provision of suitable high quality employment sites which reflect market demand is considered to be a critical part of this.

21. Providing support to small and medium enterprises (SMEs) via the Core Strategy will play a key part in driving job creation. This is reflected in the Leeds LEP's Strategic Economic Plan (2014) which also details the various funding mechanisms available to kick start development on stalled sites to drive job creation, major projects to be brought forward and infrastructure projects (such as the Apperley Bridge Rail Station), all of which will create and deliver future jobs over the plan period.

**Policy EC3 – Employment Land Requirements**

**a) What is the basis and justification for the employment land requirement for 135ha of employment land, is this effective and deliverable, and is it consistent with the latest national guidance (NPPF/PPG)?**

22. The Core Strategy projects forward the annual average rate of employment land take-up over the period July 2001 to March 2013 (9ha per annum) to produce an employment land requirement of 135ha for the plan period 2015 to 2030. Our Client is concerned that this methodology may not be robust as it takes no account of:-

- Whether the long term average take-up is a true reflection of past demand for employment land in the district or whether it has been constrained by a lack of adequate market-attractive supply in the recent past; and
- Whether the requirement it produces is sufficient to remedy the qualitative deficiencies in the Council's supply, and in particular whether it would cater for the

opportunities across all sectors of the economy over the plan period, including those specifically set out in the Core Strategy and the Economic Strategy.

23. Our Client supports the historic long term take-up rates as the starting point to consider future demand for employment land. However, when assessing past take-up it is always necessary to consider whether demand has been suppressed by an inadequate supply of market attractive sites. The 2011 ELR Update recognises at paragraph 7.2 that the use of past take-up rates has limitations.
24. The Economy and Jobs Background Paper states that take-up of employment land in the District has been monitored as an annual total since 1993 and up until March 2013 the total take up of allocated employment land was 258.7 hectares, a yearly average of 12.8 hectares. However the employment land requirement figure of 135ha reflects a lower annual take up of 9 hectares per annum over a shorter time period (July 2001 and March 2013). It is not surprising that there was a drop in take up over this period given the very severe economic downturn nationally over the latter part of this period. The issue is whether this reflected lower demand or was the result of an inadequate land supply.
25. Our Client considers that the longer term annual average take-up of 12.8ha per annum should be considered to be the minimum indicator of demand for employment land in the district (equating to 192 hectares over the plan period) and a higher take-up should be achievable if a good portfolio of market attractive sites is established.
26. Notwithstanding this, it is noted that Table 6.3 '*Take-up of Employment Land, March 2006 – March 2013 (Recession Years)*' indicates that the precise annual take up of employment land was 9.34 hectares and accordingly projecting this forward over the plan period actually equates to a target of 140ha not 135ha.
27. The second part of our case why the methodology used to establish the employment land requirement is defective is because it appears to involve little analysis of whether the existing identified supply is capable of meeting the qualitative needs of the area. National policy emphasises the importance of meeting qualitative as well as quantitative needs. In this regard, NPPF paragraph 21 (2<sup>nd</sup> bullet point) makes the clear distinction between sites for local investment (of the type which nearly all the sites within the Council's existing supply are only suitable for) and sites for inward investment "*to match the strategy and to meet anticipated needs over the plan period*". The third bullet point identifies the need for local plans to provide for the needs of specific business sectors. Similarly, NPPF paragraph 161 makes clear that local planning authorities should assess "*the needs for land or floorspace*

*for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic development.”*

28. In relation to qualitative needs, Policy EC1 and its supporting text identify various key economic development sectors that have the potential to support economic growth and job creation. These include modern manufacturing, knowledge intensive industries such as further and higher education institutions, SMEs and design and technology sectors. These are key to achieving the economic development objectives of the Council. The Council considers qualitative need at paragraph 5.1.19 of the Core Strategy which recognises that *“it is not only the quantity of available employment land that is important but the quality of supply in the right locations to attract inward investment and provide jobs. The current supply of employment land is largely comprises of small sites and in locations that would provide for local services only. The economic strategy of the Plan is to provide a portfolio of larger, flexible sites in highly accessible locations to meet the demands of modern enterprise.”*
29. This position is strongly supported by our Client, however the consideration of qualitative need does not appear to be reflected in the proposed 135ha employment land requirement which is simply based on past take up rates i.e. quantitative indicators. This apparent lack of consideration of qualitative need, and whether additional land needs to be identified to meet it, takes the Council's appraisal out of accordance with national policy.
30. Appendix 1 provides employment specialists' Dove Haigh Phillips' own assessment of the supply of employment land within Bradford, which concludes that there is a lack of larger, market attractive sites generally in the district. There are only a handful of sites which could be considered as strategically important. In particular, Bradford's existing land supply does not provide adequately for the key economic development target sectors and needs of modern businesses.
31. In summary, our Client has concerns regarding the methodology used by the Council to assess the need for additional employment because:-
- It does not properly reflect demand.
  - It does not provide for flexibility and choice.
  - It does not appear to address the qualitative deficiencies in the Council's current land supply in particular in terms of providing high quality sites for inward investment and economic growth areas.
  - It is not sufficiently pro-growth as required by national policy.

**b) What is the basis and justification for the proposed distribution of employment land to the specific areas listed and the sources of supply identified, including the areas of search for high quality employment locations?**

32. The spatial distribution of employment land is related primarily to population levels to provide all of Bradford's residents with access to employment opportunities. This approach is supported by our Client. However, the distribution of employment land also needs to match opportunities or demand. If Bradford is to progress and deliver its vision for economic growth, it is essential that sites are released with a critical mass big enough to meet this vision. Based on Dove Haigh Phillipps' analysis of the existing employment land supply, there is very limited choice of sites that can deliver high quality employment locations which will meet the requirements set out in the Core Strategy.

33. The release of our Client's site from the Green Belt would help remedy this deficiency in the district's land supply. The Site provides an unrivalled opportunity for step change in quantity and quality for employment land within Bradford and can be made available early in the plan period so that it can make its maximum contribution to the economic development of the district throughout the plan period. Accordingly, our Client fully supports part C1 of the policy which proposes to examine the need for Green Belt release within North Bradford to provide a high quality employment location. This needs to be reflected on the Key Diagram – Location Strategy through the provision of a 'Potential Localised Green Belt Deletion' at our Client's site.

**c) Has the policy properly considered the impact on roads and traffic congestion (including M602 and junctions), accessibility, the need to use brownfield land, infrastructure requirements, the environment, and the need to balance housing with employment land provision?**

34. Policy EC3 is underpinned by the 2013 Report 'Understanding Bradford' which recognises at page 6 that one of the biggest issues facing Bradford is how to accommodate a rapidly growing population and support economic growth in sustainable locations that make best use of previously developed land and minimise the need to travel by car. The report states *"The availability of good, well located sites, that are unconstrained, market ready and with good access arrangements is essential to generate development and provide jobs."*

35. Our Client considers that this is reflected in part in Policy EC3 through the identification of the need to allocate new sites for employment use together the examination of Green Belt deletes to provide high quality employment locations. However our Client is concerned that



the proposed requirement of 135ha of employment land may not be sufficient to deliver sufficient quality sites as set out above.

36. Strong support is given in Policy SC5 to the use of previously developed land when locating development and this is a key theme running throughout the Core Strategy. However this is not reflected in Policy EC3. Accordingly, it is suggested that Part B of the Policy includes such sites as an additional source.
37. In order to mitigate the issues surrounding the M606 Motorway it is essential that new allocated employment sites are not too focussed in the South east of Bradford at the expense of other areas. Balanced employment development in the North for example will help to alleviate congestion problems associated with the existing motorway corridor. As evidenced in Dove Haigh Phillips supporting report at Appendix 1 the success of locations such as the Baildon Business Park demonstrates demand for this part of district as a high quality employment location.

#### **Policy EC4 – Sustainable Economic Growth**

- a) Is the approach to assessing proposals in terms of sustainable economic development, including the criteria and requirements set out, consideration of proposals for alternative development on employment land, identifying Strategic Employment Zones and requiring BREEAM standards to be met, effective, deliverable and consistent with the latest national guidance (NPPF/PPG)?**

38. In line with advice in the NPPF and NPPG, it is considered that site proposals submitted as potential employment site allocations should also be considered for their availability and suitability in addition to their deliverability and sustainability. It is therefore requested that Part A of the Policy is amended to reflect this.
39. Part B of the Policy reflects advice in the NPPG (Paragraph: 042 Reference ID: 3-042-20140306) that although there is no formal requirement for an annual update of employment site allocations, local planning authorities should regularly review them.
40. Part C of the Policy is not consistent with Policy EC2 Part A, which in turn does not accord with the NPPF. As set out in our previous representations, our Client objects to the Council's proposal within part A of the Policy EC2 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. This would reflect the wording in Part C policy EC4.

**b) Does the policy consider accessibility, viability, regeneration and infrastructure requirements?**

41. Part A of the Policy states that the sustainability of potential site allocations will be considered by the Council. This would include an assessment of accessibility requirements. Other policies within the Core Strategy (e.g. the Implementation and Delivery policies) also set out the physical, social and environmental criteria against which all development proposals would be tested and cover issues relating to viability, regeneration and infrastructure.

**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 and 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.



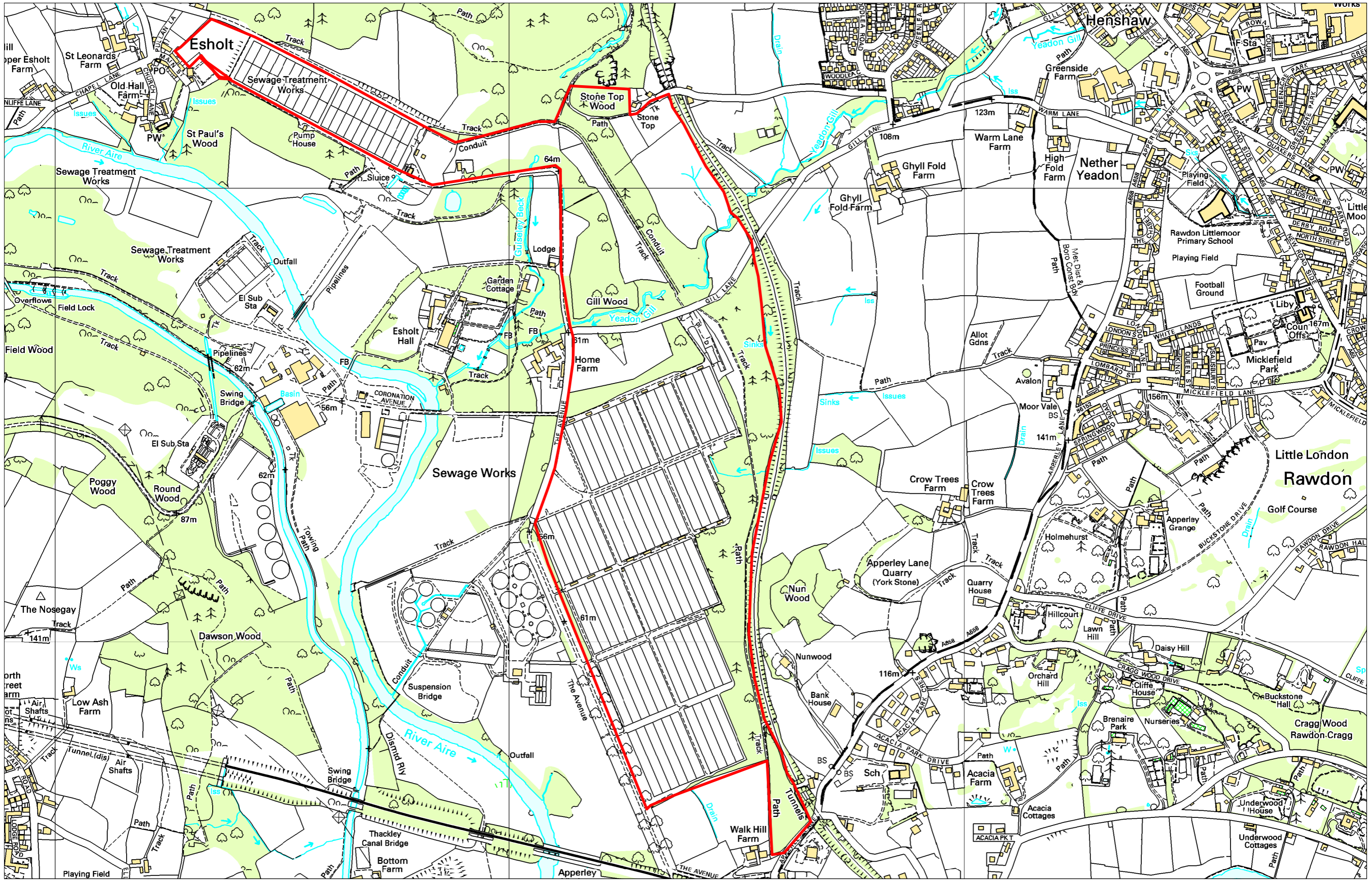
- 7.12 Looking at the characteristics of the Esholt site, it has the unique ability to deliver with certainty on all of the key criteria above. This is perhaps the most important factor – it can deliver.
- 7.13 Although at face value, the evidence of available employment land within Bradford shows an 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



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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	UDPRref	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	Staitthgate 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	Staitthgate 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>	