

**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 6 and 6A: 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 6 and 6A, which covers the Sub Area Policies, is contained in this statement. The key issue highlighted by the Inspector is:

*“Does the Plan set out a clear, effective and soundly based framework for the Sub-Areas of Bradford, Airedale, Wharfedale and the South Pennine Towns and Villages, which is appropriate for the area, effective, positively prepared supported by a robust, credible and up-to-date evidence base and consistent with national policy?”*

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

**MATTER 6A – SUB-AREA POLICIES**

**POLICIES BD1-BD2 – CITY OF BRADFORD INCLUDING SHIPLEY AND LOWER BAILDON, including Strategic Pattern of Development. Urban Regeneration and Renewal Priorities, Peripheral Communities and Growth Areas, including South-East Bradford, including Holme Wood urban extension, North-East Bradford, North-West Bradford and South-West Bradford**

**Strategic Pattern of Development**

**a) Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?**

8. The distribution of housing development is focused on the larger urban areas and settlements within the district. The principles underpinning this approach are set out at paragraphs 5.3.41 to 5.3.64 of the Core Strategy and are considered in general to provide sufficient justification and evidence to support the broad distribution of development.
9. Notwithstanding this it is noted that the housing targets for Bradford City Centre, Shipley and Canal Road Corridor and Bradford South East are particularly high. This appears to be at the expense of other areas such as Bradford North East where housing is proposed to be constrained to as level below the identified need based on population. This is considered to be an unsound approach.
10. The 2013 SHLAA indicates that for South East Bradford in particular there is insufficient capacity to accommodate the required dwellings (5,318 dwellings in comparison to the Council's target of 6,000 dwellings) over the plan period as well as a heavy reliance on sites where notable constraints are to be found. Conversely, the 2013 SHLAA indicates that North East Bradford has capacity to deliver an additional 500 dwellings above the proposed target of 4,700 dwellings.

11. This emphasises that accurately establishing distribution is difficult to achieve without knowing the details of allocations and so consequently the Council cannot fully justify the broad distribution of housing development within the Regional City of Bradford.
12. It appears that in arriving at its proposed distribution of dwellings across the District, the Council has placed a strong emphasis on the Growth Study that has been produced to examine areas adjacent to settlements that are subject to constraints. This however appears to largely ignore important factors such as viability considerations and sustainable sites (such as previously developed sites) located beyond the settlement boundaries. Our Client considers that without proper thought to viability it will be difficult for the Council to undertake their desired distribution of housing in lower value areas of the District and certain previously developed sites may not be able to be delivered in the current market. This in turn this will unduly affect the Council's ability to achieve its overall housing target.
13. The distribution of the majority of employment land (74%) to the Regional City is supported by our Client, but as set out in our Statement to Matter 5, our Client considers that the overall figure is too low and should very much be treated as a minimum. Accordingly, we consider that the employment land figure for the Regional City could be higher and at the very least this part of the policy should replace the word 'approximately' with 'a minimum of' 100ha of new employment land.

**a) Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**

14. Whilst our Client is broadly supportive of this part of Policy BD1 there are residual concerns around the approach taken to the distribution of housing and its deliverability in certain parts of the City, together with the overall quantum of employment land as set out above.

**Growth Areas:**

**b) North-East Bradford:**

- i. Is there sufficient justification and evidence to support the proposals for North-East Bradford, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?**
- ii. Is there sufficient evidence to justify the need for some local Green Belt changes?**

15. As set out in our previous representations, our Client strongly supports the principle of part C2 of Policy BD1, in which the Esholt Site is proposed as a new employment opportunity adjacent to Apperley Bridge. However, our Client objects to the specific wording of this aspect of the Policy, as it is considered to be too prescriptive and would not allow for flexibility throughout the lifetime of the plan period. In this regard, it is noted that paragraph 21 of the NPPF states that *"policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances"*.
16. The Council is proposing to provide a *"high quality research and development led technology park and commercial enterprise"*. The Esholt Site could potentially accommodate 1 million sq ft of employment space. Whilst it is considered possible that the Esholt Site could accommodate an element of research and development uses as part of the overall mix, it is not considered appropriate to restrict the Site solely to this specific type of employment use.
17. The Esholt Site is considered to be highly suitable for small to medium sized businesses, many of which may already be situated within Bradford or Leeds. It is considered likely that such businesses will feed into other manufacturing businesses in the North Bradford area creating supply chain links. The Esholt Site provides an excellent opportunity for the Council to provide a high quality employment site that attracts new-economy businesses.
18. The Promotional Document that has previously been submitted in support of the Esholt Site demonstrates its deliverability and together with the Supporting Report by Dove Haigh Phillipps appended to our Statement to Matter 5 'Economy and Jobs', further emphasises the unique opportunity provided at the Esholt Site. The Supporting Report demonstrates that the nearby Baildon Business Park site has successfully attracted a range of occupiers across various sectors such as aerospace, medical/surgical product manufacturing and the health care sector. This provides evidence that a range of businesses are attracted to this part of Bradford.
19. It is considered that the Esholt Site's location and high quality setting, will attract innovators, entrepreneurs and investors who need a high quality base which reflects the values of their growing businesses.
20. There are concerns that the proposals outlined in part C2 of Policy BD1 have not been fully justified by the Council and cannot be considered to be sound. This is on the basis that it does not comply with the requirements of paragraph 182 of the NPPF with regard to being justified and effective.

21. Accordingly, the wording of the Policy should be amended so that it provides greater flexibility for the types for the types of employment use that can be delivered at the Esholt Site. The Policy should read as follows:

**“A new employment opportunity including high quality research and development and new economy businesses linked to the Airedale Corridor will be located at Apperley Bridge”**

22. It is considered that the above revision to Part C of Policy BD1 will ensure that a high quality employment site comes forward at the Esholt Site which includes research and development uses whilst also providing greater flexibility to allow other suitable employment uses at the site, too provide for the greatest amount of economic growth. Accordingly, this would make this part of the Policy sound on the basis that it is deliverable, flexible and justified.

23. With respect to Green Belt changes, as set out in our Statement to Matter 3, it is clear that Green Belt sites will need to be released in order to meet North East Bradford’s housing and employment land requirement over the plan period and provide suitable high quality employment sites. Our Statement and the Support Report by Dove Haigh Phillipps at Appendix 1 create a compelling case as to why there are exceptional circumstances which mean that the Esholt Site should be released from the Green Belt.

**h) Is there a reasonable or realistic prospect of the Outcomes set out in the Plan (4.1.1-4.1.11) actually being delivered by the end of the Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?**

24. The outcomes include (at paragraph 4.1.11) the former treatment works at Apperley Bridge having become *“a high quality commercial research and development let technology park” of City regional significance* and has *“created a wide range of employment opportunities for Bradford district and the wider City Region.”*

25. As demonstrated in our previous representations and accompanying Promotional Document together with the Supporting Report at Appendix 1 of our Statement to Matter 5, there is a very reasonable and realistic prospect of this outcome being delivered by the end of the plan period( i.e. 2030) for numerous reasons as detailed in Section 7 of the Supporting Report at Appendix 1 of our Statement to Matter 5. They the fact that the Esholt Site is owned by a single landowner who has a credible track record of delivering the redevelopment of brownfield sites for commercial uses and in particular former operational Yorkshire Water

sites; the proximity of Site to an affordable labour pool and markets, its commercially attractive location including proximity to Leeds Bradford Airport and the new railway station and park and ride at Apperley Bridge and the Site's high quality environment. In addition, our Client wishes to bring the site forward for development as soon as possible. A number of background assessments have already been completed for the Site including a Phase 1 Ecology Survey and Report, Access Appraisal, Landscape Appraisal, Employment Evidence and an indicative masterplan has been drawn up for the Esholt site. These assessments have not identified any fundamental constraints to development. In addition, our Client has had numerous meetings over the last 12 months with the Council's officers to discuss the proposals for the Esholt Site and develop the masterplan.