

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: 108)*****MATTER 3: REVISED SPATIAL DISTRIBUTION OF DEVELOPMENT (policy SC5 and associated policies BD1, AD1, WD1, PN1 & HO3)*****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 and oral representations/statements and Promotional Document submitted in relation to the emerging Core Strategy.

6. Our Client's response to Matter 3, which covers the Revised Spatial Distribution of Development is contained in this Statement. The key issue highlighted by the Inspector is:

"Is the proposed revised spatial distribution and location of development appropriate, effective, deliverable, locally distinctive and justified by soundly-based, 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?"

a) Regional City of Bradford

- i. Why has the apportionment of development to the Regional City of Bradford (including Shipley & Canal Road Corridor [3,200-3,100], Shipley [1,250-750] and Bradford North-East [4,700-4,400]) been reduced from 28,650-27,750 dwellings?***

7. The Council states that the proposed reduction to North East Bradford is as a result of a decrease in potential available, deliverable and developable land supply in SHLAA 3 compared to SHLAA 2.

- ii. Does the amended distribution of development properly reflect policy constraints (e.g. Green Belt), physical constraints, such as flooding, infrastructure, facilities traffic and transport, heritage, landscape and environment (including the updated HRA), the latest land availability information, and cross-boundary implications?***

8. As per previous representations to the Core Strategy, including the proposed main modifications and during Examination hearings, our client continues to object to the Council's proposed reduction for North East Bradford.
9. The revised level of growth proposed is not considered to be commensurate with size and sustainable nature of North East Bradford. Policy BD1 is not considered to be sound as currently drafted and does not meet the tests as set out at paragraph 182 of the NPPF.
10. The proposed reduction would conflict with the Core Strategy's aim, as set out at Policy SC4 that the Regional City of Bradford will be the prime focus for housing.

11. We also refer back to the representations we made with regard to the viability and market issues facing other parts of the Regional City of Bradford (e.g. South East Bradford) which has significantly more houses proposed than North East Bradford.
12. There is sufficient land supply within the North East Bradford to accommodate a greater level of development than the 4,400 units now proposed and the number should revert back to the previously proposed 4,700 figure.

iii. Is the amended distribution of development likely to be deliverable over the plan period, and does it reflect an appropriate balance between brownfield and greenfield land?

13. It is Keyland's view that North East Bradford is able to deliver more than the current proposed distribution over the plan period and as such the distribution should be higher as set out in our previous representations.
14. The use of brownfield land within the Green Belt in North East Bradford is supported. We refer back to our previous comments at the 2015 hearing sessions in relation to the Government's clear support for the use of previously developed land in Green Belt areas which can be put to more productive use.
15. We look forward to expanding upon the above matters further at the forthcoming EiP.