

## Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

### PART B – YOUR REPRESENTATION - *Please use a separate sheet for each representation.* (Additional Part B forms can be downloaded from the web page)

#### 4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM18

#### 5. Do support or object the proposed main modification?

Support

Object

Object

#### 6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

#### 7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

Unsound

#### 8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Effective

Consistent with National Planning Policy (the NPPF)

Not Consistent

#### 9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to a proposed main modification).

The evidence shows that ample brownfield sites have been left undeveloped. Bradford has not had a positive strategy for recycling these sites and therefore cannot be said to have acted in accordance with National Policy. The SHLAA does not represent a full picture of land availability in the Bradford District. See evidence below.

There is substantial evidence to show that jobs have not been created as a consequence of greenfield development. Substantial greenfield sites were used during a period when Bradford lost 2,049 jobs and there was a structural change which reduced job densities (the closure of factories and a shift to office based jobs). This represents a migration of jobs out of the central urban area. Not the creation of jobs. The sites that were vacated have not been picked up/identified by the Council for redevelopment.

It is not possible to accurately quantify the totality of brownfield land and derelict premises across Bradford based on the information provided by the Council. It has not conducted a review /survey of brownfield sites despite being advised to in writing by the DCLG (as were all LPAs). The Employment Land Review focused solely on the sites remaining from the RUDP allocations and a few others that had planning permissions for B-class use and the SHLAA appears to consist of sites owned by the Council, Parish and Town Councils and sites proposed by owners and developers (incidentally one of these, in the greenbelt at Addingham, is owned by local residents who have no intention of selling as they bought it to prevent development). The Council has persisted in this approach and there is no evidence that it has been pro-active in ensuring that post-industrial brownfield sites in particular are promoted. Bradford did not appear on the list of applicants for Government grants for site remediation to kick start stalled sites.

However, there is ample evidence at street level of the scale of the problem and it is one of the primary concerns of local people. The southern half of Bradford West Constituency, formerly filled with thriving factories, is particularly badly affected. Vacant sites, unsurfaced car parks and derelict buildings can also be seen from satellite photographs (DEFRA Magic Maps are particularly useful, they are slightly out of date but not by much, they show the recently opened Westgate Shopping Centre as a building site).

In addition, there is clear evidence that both jobs and housing have been migrating onto greenfield sites and away from former industrial areas over a long period of time and this Plan will only reinforce and continue that process.

From 1998 to 2008 the DCLG maintained detailed records on business premises (now archived). These show year-on-year changes in the net internal area of business premises broken down by class for each Local Authority. What the records show is that across the decade there was a net reduction in internal floorspace for 'B'-class premises of 559,000 square metres in Bradford. This net figure does not show the full extent of abandonment because other premises, many on greenfield sites, were opened up during the period. Some of the vacant buildings or the land they stood on will have been recycled for residential or non-B Class business uses, some excellent developments listed in the RUDP have been completed (at Manningham Mills, Little Germany and Trident for example). But regeneration was limited, DCLG land use figures show that in recent times circa 40% of new homes in Bradford were built on previously developed land but much of that was formerly occupied by houses or their gardens, not industrial premises. This is about average for England but should not be happening in an area of industrial decline.

Table 5 (below) takes the data on the change in the floorspace occupied by businesses in Bradford from 1998 and 2008 and as an illustrative exercise estimates the area of land that might be associated with it using the formula employed by ARUP in Bradford's Employment Land Review.

<b>Table 5: Change in internal area of business premises Bradford 1998 - 2008 (metres squared)</b>				
<b>Business use class</b>	<b>1998 area</b>	<b>2008 area</b>	<b>Increase</b>	<b>Decrease</b>
Retail premises	1,188,000	964,000		224,000
Offices	735,000	904,000	169,000	
Factories	3,714,000	3,085,000		629,000
Warehouses	1,766,000	1,720,000		46,000
Other bulk premises	NA	171,000	171,000	
<b>Change</b>			<b>340,000</b>	<b>899,000</b>
<b>Net Change</b>				<b>559,000</b>
<b>Equivalent land area (ARUP Methodology)</b>	<b>Net internal area = 80% of Gross internal area</b>			<b>1,746,875</b>
	<b>Gross internal area = 40% of Land area</b>			<b>174.69 Ha</b>

The RUDP (2005) compounded the problem of migration to greenfield sites and abandonment of industrial areas. Of the 193 hectares of employment land it identified 100 are described in the narratives for Parliamentary Constituencies as 'greenfield' and one is the 35 hectare West Bowling Golf Club on the M606 corridor. The greenfield locations provided the bulk of the larger sites. By the time ARUP conducted the Employment Land Review (2007) only 123 hectares of the RUDP employment land remained and by April 1<sup>st</sup> 2013 just over 107 hectares, most of the larger sites (including the West Bowling Golf Club) having been used up (ref: Core Strategy Background Paper 3: Economy and Jobs, February 2014, BMDC). This might not induce concern, Lincoln for example has successfully created a thriving commercial and industrial ring round a vibrant residential and retail core, but for one fact: for much of that period the number of jobs in Bradford was falling; and to a greater extent than among regional neighbours (Leeds in particular) and across England as a whole. The Economic Forecast for Bradford November 2014 (published January 2015) cites the REM in showing that full-time equivalent posts in Bradford fell from 171,574 in 2007 to 169,525 in 2013. Clearly employment had migrated to greenfield sites, there had been no net job creation, rather a net loss of 2,049 jobs. This shows that premises and sites in the former industrial heart of the City will have been vacated but the topline figure masks the full extent of abandonment which would have been exacerbated by structural changes in the jobs market away from land-intensive low jobs density manufacturing industries towards less land intensive high jobs density office based operations.

Bradford Council's strategy for job creation based on the outward migration of jobs and homes from its core to its green fields does not work, it has not worked in the past and it will not work in the future. Encouraging further migration, into the greenbelt in particular, will not stop economic decline and will inflict further damage on an already fragile economy. Derelict areas and derelict cities deter inward investment and they present difficulties in maintaining and improving infrastructure that accelerate decline.

## **Sustainability**

Allowing development on greenfield sites and in the greenbelt while failing to regenerate urban areas has direct financial consequences. It commits the Council to building and maintaining the infrastructure required by that development yet does nothing to alleviate the financial burden of maintaining the infrastructure that remains centrally. The integrity of the complex network under, as well as over, ground has to be maintained but the urban land that should be generating income (rates and GDP) is no longer delivering the revenue required to it. It should not be a matter of policy, as it appears to be in Bradford, that outlying settlements maintain the core. Bradford's Local Plan will suck resources out of currently stable settlements and communities outside the centre and compromise their ability to sustain themselves.

In addition, when it occurs, development in the greenbelt has damaging environmental consequences, particularly in areas subject to flooding which generates additional costs. However, as we have seen, most outlying settlements will not see housebuilding at the levels proposed in the Plan because the customer base will not support it. The principal exceptions to this are Wharfedale settlements (particularly Ilkley) and Silsden. All which flood regularly. Bradford West Constituency does not have the same problem as it is a flat area away from rivers.

**10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.**

**You need to say why this change will make the proposed main modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete it.

11. Signature:

[Redacted Signature]

Date:

20/01/16

**Thank you for taking the time to complete this Representation Form.**