

Bradford City Centre Area Action Plan: Further Issues and Options

State of Consultation

**Public Consultation
February 2013 – May 2013**

1.0 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
1.		Claire Streather	Coal Authority	
2.		Ian Smith	English Heritage	
3.		Toni Rios	Highways Agency	
4.		Rose Freeman	The Theatres Trust	
5.		Ashok Burton	Resident	
6.		Brian Teale		
7.		Mr Wood		
8.		Matthew Naylor	Keyland Development Ltd	
9.		Mrs Slinger	Resident	
10.		Craig Blatchford (Agent)	BLD (Bradford) Ltd	Blue Sky Planning
11.		Andy Welsh	Bradford College	
12.		John King	Natural England	
13.		Bob May (Agent)	Westfield Shopping Town Ltd	Turley Associates
14.		Katherine Morgan (Agent)	Royal Mail Group	DTZ
15.		Bev Lambert	Environment Agency	
16.		Clive Brook	Bradford Property Forum	Dacres / Johnson Brook Planning
17.		Michael Long	Metro	
18.		Ivan Mack	Resident	
19.		Bruce Barnes	Resident	
20.		Sharon Smart	Resident	
21.		David Park	Resident	
22.		Graham Bentley	Resident	
23.		Richard Radcliffe	Resident	
24.		Jenny March	Resident	
25.		Dr G.J. Llewellyn	Resident	
26.		N H R Smith	Resident	
27.		Elizabeth Hubbard	Resident	
28.		Alan Hall	Bradford Civic Society	
29.		Mr & Mrs Shaw	Resident	
30.		Barney Lerner	Aire Rivers Trust	

2.0 Summary of Representations

2.1 The table below sets out the key points raised in the representations received for each section of the Bradford City Centre Area Action Plan. The full representations and responses can be found in Section 3 of this report.

Boundary
<ul style="list-style-type: none">▪ General support for the City Centre Boundary▪ Lack of explanation of why Forster Square Retail Park (Phase 1) is no longer within the AAP boundary.
Vision
<ul style="list-style-type: none">▪ High levels of support for the AAP Vision for the City Centre▪ The Vision needs to address issues of Green Infrastructure, Flood risk and generally have stronger links to the environment.▪ The vision needs to pick up on the cultural aspects and assets of the city centre.
Objectives
<ul style="list-style-type: none">▪ Broad support for the objectives put forward in the AAP.▪ Objectives fail to address Green Infrastructure and the environment, and will need to strengthen these themes in the Publication Draft objectives.▪ Objectives fail to address sustainable transport and will need to pick up this theme in the Publication Draft objectives
Strategic Approach
<ul style="list-style-type: none">▪ Confusion over the use of neighbourhood boundaries and land use. Clear need to clarify in the Publication Draft the boundaries are indicative and do not constitute land use planning zones.▪ Strategic approach needs to address Green and Blue (Bradford Beck) on a strategic city wide area.▪ Strategic approach needs to address connections between the neighbourhoods.
Bowl Proposals
<ul style="list-style-type: none">▪ The document needs to take greater consideration of the City Centre Conservation Area and listed buildings in the design statements for proposed allocations within the Bowl Neighbourhood.▪ Objections surrounding the proposed allocation for office led mixed use, with an alternative of music venue proposed for the former Bradford Odeon.
Channel Proposals
<ul style="list-style-type: none">▪ The document needs to take greater consideration of the City Centre, Little Germany, Cathedral Precinct Conservation Areas and listed buildings in the design statements for proposed allocations within the Channel Neighbourhood.▪ Concerns raised over the need for masterplans for the development of certain sites, and whether this is too stringent and may jeopardise the delivery of development.

Market Proposals
<ul style="list-style-type: none"> ▪ The document needs to take greater consideration of the City Centre Conservation Area and listed buildings in the design statements for proposed allocations within the Market Neighbourhood.
Valley Proposals
<ul style="list-style-type: none"> ▪ The document needs to take greater consideration of the Goitside Conservation Area and listed buildings in the design statements for proposed allocations within the Valley Neighbourhood.
Learning Quarter Proposals
No Comments Received.
Southern Gateway Proposals
<ul style="list-style-type: none"> ▪ Consideration should be given to the possibility of retaining and reusing some of the historic buildings in the Southern Gateway Neighbourhood, where their retention could assist in giving this area a sense of identity.
City Living and Community Provision
<ul style="list-style-type: none"> ▪ Lack of emphasis on how the plan will encourage the delivery of the residential conversion of historic buildings. ▪ The plan needs to examine the impact upon the environment development may have. ▪ The plan needs to emphasise the importance of protecting residents from the impacts of the night time economy. ▪ It should also explain how to facilitate development without creating pollution impacts on the environment and therefore meet the requirements of the WFD where relevant. ▪ Greater flexibility should be introduced into site designation so that in some locations a housing use is only seen as an option for the developer to consider alongside other uses. ▪ Greater clarity is required at this stage of the plan-making process with regard to the extent to which affordable housing can realistically be delivered in the City Centre.
Shopping and Leisure
<ul style="list-style-type: none"> ▪ The AAP will need to plan for a contraction in the extent of the existing retail area in order to achieve a more focussed, vibrant, retail core ▪ A flexible approach should be applied to shopping frontage policy ▪ Support for the use of primary and secondary frontage in the Primary Shopping Area. ▪ There needs to be better pedestrian connectivity between the retail areas and the other parts of the City centre. ▪ Key arrival points is important and this should extend to visitors arriving in the city centre by all modes of transport, including rail and car. ▪ More ought to be made of the fact that Bradford is a UNESCO creative city.
Business
<ul style="list-style-type: none"> ▪ The Plan needs to consider how the presence of the University and Bradford College might be better utilised to deliver the regeneration of the City. ▪ City Centre should be the main focus for large employer in major office, retail and leisure development. ▪ The expansion of cultural offer should be seen as a potential source of major jobs growth.

Further and Higher Education

- Future student accommodation has the potential to help regenerate the heart of the City.
- The wording is defensive and seems to be a missed opportunity to spell out just what a well planned and connected city centre action plan could deliver.
- The AAP need to encourage the expansion of knowledge and skills development in the city centre to support the necessary development of labour markets within the city but across the Leeds City Region
- The AAP should create a framework to attract investment into the city from businesses that compliment the offerings of the College and University.

Movement

- Quality of route in the city centre should include cyclists as well as pedestrians
- The Plan also needs to address the extent to which there is vehicle penetration into the heart of the City. Consideration should be given to closing roads to traffic in order to create a more pedestrian-friendly environment.
- Consideration also needs to be given to how the two stations might be better linked to one another.
- The scheme to connect the two stations should be an option.
- The city centre should have a coordinated car parking strategy

Built Form

- For sensitive or complex sites, the local planning authority should produce detailed Masterplans Design Briefs to guide their development.
- When considering speculative, unallocated, sites, proposals should also be assessed against not only the documents set out in this Section but should also have regard to the guidance contained in the respective Conservation Area Assessment.

Public Realm

- The AAP currently lacks any definition of green infrastructure, or local context to help quantify the importance of green infrastructure and green space in Bradford.
- The AAP makes no reference to the intrinsic value of biodiversity, nor the aim of enhancing it, as set out in objective 8.
- General support for the improvement to the public realm and the use of CIL / S106 to fund the improvements.

Implementation and Delivery

- Concerns regarding the issue of the viability of CIL in the City Centre.
- Some support for the use of an LDO in the City Centre.

2.0 SCHEDULE OF WRITTEN REPRESENTATIONS

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Claire Streater – Coal Authority	<p>Our records indicate that there are surface coal resources present across the entire City Centre AAP area. The Coal Authority considers that the AAP document should therefore acknowledge the presence of this mineral resource and promote the prior extraction of the surface coal as part of regeneration proposals within the AAP area. Paragraph 143 of the NPPF promotes the prior extraction of mineral resources to avoid their unnecessary by non-mineral development.</p> <p>Prior extraction of surface coal is not only applicable to large Greenfield developments on the edge of settlements; The Coal Authority has examples of small scale infill and regeneration schemes where prior extraction of surface coal proved viable and was undertaken, therefore we consider that there is no reason to exclude this requirement from the Bradford City Centre AAP.</p> <p>The Coal Authority would therefore wish to see the following paragraph added to the AAP: <i>Geological mapping indicates that there are coal resources present across the City Centre which are capable of extraction using surface mining methods. As part of any development or regeneration proposals within the AAP area full consideration will need to be given to the extraction of those mineral resources prior to development taking place, in order that the mineral resources are not unnecessarily sterilised.</i></p> <p>Reason – In order to ensure that coal resources are not unnecessarily sterilised by new development, in line with paragraph 143 of the NPPF.</p>	<p>The Council recognises the importance of coal resources raised within the Coal Authority's representation.</p> <p>The importance of coal resources and it's potential extraction will be stipulated within the Publication Draft document.</p>	See Policy BF3.
	Claire Streater – Coal Authority	<p>Comment – As a result of the presence of surface coal resources, there is a limited legacy of past coal mining activity within the AAP area. The extreme eastern edge of the AAP area is likely to have been subject to historic unrecorded underground coal mining at shallow depth, which could potentially result in the presence of unstable land. The Coal Authority therefore considers it important that the AAP recognises the mining legacy and requires developers to fully consider ground conditions in this part of the AAP area, in line with the requirements of paragraphs 120-121 of the NPPF.</p> <p>The Coal Authority provided your Development Management team in August 2010 with GIS data indicating the spatial extent of coal mining legacy across Bradford. This information indicates that parts of The Channel and Southern Gateway AAP sub-areas are potentially affected by unstable land. In particular, development proposals for proposed site allocations CH/1.6 and CH/1.7 will need to afford due consideration to the potential presence of unstable land. Any planning application for these two sites would be expected to be accompanied by a Coal Mining Risk Assessment, or equivalent. The Coal Authority would recommend that this requirement is highlighted in the AAP for these two sites.</p> <p>Reason – In order to ensure that issues of mining legacy and resulting unstable land are highlighted and afforded due consideration as part of development proposals, in line with paragraphs 120-121 of the NPPF.</p>	See previous response.	See Policy BF3.
	Ian Smith	This Section paints a good general picture of that part of the District covered by the AAP and	The Council is in agreement with this	Suggested change agreed and

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	English Heritage	<p>some of the issues that it faces. However, it would be worth emphasising the important role that its legacy of fine historic buildings plays in contributing to the distinct identity of the City Centre.</p> <p>Suggested Change: Paragraph 2.5 line add to the end:- ".. and this rich heritage helps to contribute to the distinct identity of the City Centre".</p>	comment and the suggested change will be taken into account in the production of the Publication Draft document.	amended.
	Ashrok Burton Resident	<p>My support and recommendations towards the consultation would be for the following proposals from the attached document ["Common Sense" Regeneration – A Plan to Revive the Fortunes of Bradford and its People]:</p> <p>-Proposal 5 - re-routing of the central Bradford ring road to incorporate, rather than cut off, areas of significant interest, e.g. the NMM and Goitside, to allow a more integrated development of Bradford city centre</p> <p>- Proposal 7 - development of a crossrail link, vastly improving transport through the city and also, as we discussed, giving the council some legal powers to compulsorily acquire at least a part of the Westfield site for passage of the rail line.</p>	<p>Transport improvements / proposals for overcoming issues facing the city centre will be tested through the Transport Study, currently being commissioned by the Council.</p> <p>The Transport Study will assess existing and future transport issues facing the city centre, and test proposals to overcome these issues and potentially put forward alternative solutions.</p> <p>The results and recommendations of the Transport Study will be taken forward into the Publication Draft document</p>	See revised Revised Movement Chapter.
	Brian Teale Resident	<p>On the whole I support the ambitions of the Bradford Area Action Plan. However, the delivery of 3,500 new homes, as proposed by the Core Strategy Further Engagement Draft is unrealistic, in my opinion. This is because much of the need and demand for new housing in Bradford is driven and will continue to be driven by its community of south Asian origin, who have a strong preference and need for family sized 3+ bed semi-detached and detached housing. Whilst there is also some need for 1 and 2 bedroom flats and bedsits, this can largely be attributed to those who lack the means to purchase market housing or pay market rents. Need is not therefore translated into demand and this will continue to stifle the viability and deliverability of housing within the City Centre. A significantly lower and more achievable housing figure ought to be adopted for Bradford City Centre, with the bulk of the housing that is proposed not being expected until after 2020.</p>	<p>The strategic approach of allocating 3,500 houses to the City Centre AAP boundary area has been tested through the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Further work on the housing figure for the District has been carried out through an update to the SHMA and the Housing Requirement Study.</p> <p>The housing figure for the city centre is considered robust and will not change in the production of the Publication Draft document.</p>	No action required.

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	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	<p>One of the key concerns of the Property Forum is the existence and production of multiple plans relating to the city centre including the following: -</p> <ul style="list-style-type: none"> ▪ The City Plan – an overarching plan which seeks to integrate all planning for people, property and places. (but with no planning status) ▪ Neighbourhood Plans. ▪ Street Design Guide. ▪ City – wide Infrastructure Delivery Plan. ▪ The City Centre Area Action Plan – the only statutory development plan currently with a rather narrow land allocations base. <p>In addition an extensive evidence base of several documents has been produced which is welcomed. The previously commissioned Alsop Master Plan (September 2003) provided a new vision and several exciting area – based master plan, macro design and regeneration initiatives. The delivery of City Park is a focal public realm project inspired by the Alsop Plan.</p> <p>The Forum's concern is that the CCAAP currently lacks a clear focus and vision and does not integrate with and draw upon other plans and design guidance which exist. The acid test for the future development of the CCAAP is whether this plan will provide i) the vision and inspiration required ii) a co-ordinated design and infrastructure approach iii) an appreciation of realistic delivery mechanisms which developers and investors require in order to create understanding and engagement.</p> <p>The Forum would have preferred to see one integrated plan for the City Centre for ease of understanding. We now have a better understanding of the bold vision and brand the Council seeks to build with City Plan, but have a concern that inward investors may find the relationship between City Plan and the CCAAP hard to grasp. We would welcome the production of a set of FAQs around their interface to address that.</p> <p>The Further Issues and Options Report is a collection of development site allocation proposals, the majority of which are heavily dependent on housing as the prime land use component. These allocations do not appear to be presented as options. If the intention is to support the progression of all of these development allocations then much greater clarity must be provided on the process and programme for their delivery and how they relate to and integrate with regeneration, public realm and infrastructure improvements, in particular transport and connectivity. This might for example be achieved via a set of integrated area master plans (see Section 6).</p> <p>Paragraph 2.24 of the draft AAP states that “the City Plan will inform the Bradford City Centre Area Action Plan (as the statutory development plan) to deliver the schemes and associated infrastructure over the next 15 years”.</p>	<p>The Council acknowledges this comment and will revisit the Vision and look to strengthen ties to other existing plans and design guidance.</p> <p>The City Plan is now complete, and forms the strategic framework to guide the regeneration of Bradford City Centre. The City Plan has been used to inform the AAP and will serve alongside the AAP.</p> <p>The list of proposed site allocation put forward in the Issues and Options Report is a long list of sites put out to consultation for initial testing. The Publication Draft document has taken account of comments made and put forward a comprehensive set site allocations, with detailed supporting statements and delivery information.</p> <p>The City Plan is will guide the regeneration of the city centre, with the AAP forming the statutory planning framework.</p>	<p>No action taken.</p> <p>No action taken.</p> <p>No action taken.</p> <p>No action taken.</p>

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		<p>If the 'City Plan' is to be fully integrated into the statutory AAP by Autumn this year and it leads to a speedier production of the final AAP then the Forum would support such an approach. However if there is a significant disconnect between the two plans and other evidence base plans, such as the Infrastructure Plan, this will in our opinion greatly weaken the positive planning which is required to deliver an enhanced City Centre environment for all.</p> <p>Housing</p> <p>While there has clearly been considerable background work on the evidence base the overall progress achieved to date and the length of time taken to reach this Further Options stage is disappointing, as is the level of refinement of most of the options.</p> <p>Given that housing is the majority land use proposal in the AAP we would expect to see at this stage an assessment of the major delivery mechanisms which might realistically be used. We suggest that this should include consideration of the following: - Involvement of the Homes and Communities Agency in forward funding. -Potential cross-investment by the major housebuilders from greenfield developments elsewhere in the City via variation in Section 106/CIL requirements particularly in relation to affordable housing. -Setting a nil CIL rate within the City Centre. -Utilise City Council owned property as a pump-priming mechanism.</p> <p>The evaluation of these and other delivery options would greatly assist an assessment of the realistic market potential for delivering 3,500 new City Centre dwellings within the plan period as well as the delivery potential of individual projects.</p> <p>The need to considerably enhance the provision of supporting community facilities and amenities is of vital importance to the creation of a successful housing sub market in the City Centre.</p> <p>The key issues for housing delivery in the City Centre are stated at paragraph 4.12 of the AAP. The following key issue should be added to the list: -</p> <ul style="list-style-type: none"> ▪ Funding mechanisms and achieving viable schemes. <p>The AAP needs to be much clearer with regard to how new housing development can be delivered as part of mixed use schemes.</p> <p>Shopping and Leisure</p> <p>The Property Forum strongly supports the Council's vision and objectives for enhancing the qualitative and quantitative aspects of the shopping and leisure experience in the City Centre. We agree that a cohesive retail core needs to be established with strong pedestrian connectivity with the new Broadway development. This is essential to the creation of a quality shopping environment and to do everything possible to avoid significant retail voids being created in the key connection areas.</p>	<p>See comments above on the Publication Draft site allocations.</p> <p>Major house builders and the Homes and Communities Agency have been consulted on the Issues and Options Report and will be further consulted during future stages of production.</p> <p>Viability is a key issue in the City Centre in regards to the delivery of developments. The Council has considered this key issue and produced a viability assessment of the plan</p> <p>The Council welcomes the 'Forums support for this approach.</p>	<p>No action taken.</p> <p>No action taken.</p> <p>See Viability Assessment for the Area Action Plan.</p> <p>No action taken.</p>

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		<p>Movement The forum are particularly disappointed with this section which does not appear to have advanced thinking on the much needed transport improvements in the City Centre. Attendance and discussion at the recent AAP workshop has added little to our understanding of the type, range and location of transport projects and connectivity improvements which the City Council have in mind. Reference was made to a possible NGT (trolley bus) connection but the timing and benefits of this do not appear to have been considered. It is of some concern that the draft AAP suggests a further transport study will be required before proposals can be formulated and costed.</p> <p>Built Form The Findings of the Conservation Area Assessments, the Listed Buildings Review and the City Centre Design Guide need to be fully integrated into the AAP. The strategic options for dealing with the numerous listed buildings are not covered.</p>	<p>The Council has recently completed a City Centre Transport Study. The Transport Study for the City Centre has assess the existing and future transport issues facing the city centre, and assesses the potential solutions and put forward alternatives where necessary.</p> <p>The Council has strengthened the guidance on heritage throughout the document.</p>	<p>See revised movement and Transport Study for the Area Action Plan.</p> <p>Heritage guidance inserted in Neighbourhood Spatial Frameworks and the Built Form Chapter.</p>
	Bev Lambert Environment Agency	<p>Water Management The report does not make any direct references to water resources/water management issues, such as water availability/demand/efficiency etc. We believe this is an oversight and that water resources should be addressed in the document. There is also no mention of the Water Framework Directive, water quality, or SuDS, in the document. Again, we believe these are all issues which should be addressed in the document.</p> <p>Waste Management There are also very few references to waste management issues, although the document does at least make reference to the existence of the Waste DPD.</p>	<p>The Council recognises the importance of water management in the City Centre will look to include this as a prominent issue in the Publication Draft document and strengthen links to the Water Framework Directive.</p> <p>The Council recognises the importance of waste management in the City Centre and has bolstered this issue in the Publication Draft document by strengthening links Waste Management DPD.</p>	<p>Water Management now an objective of the City Centre AAP.</p> <p>See Policy Linkages to Waste Management DPD throughout the document.</p>
	Mr Wood Resident	<p>On the whole I support the ambitions of the Bradford Area Action Plan. However, the delivery of 3,500 new homes, as proposed by the Core Strategy Further Engagement Draft is unrealistic, in my opinion. This is because much of the need and demand for new housing in Bradford is driven and will continue to be driven by its community of south Asian origin, who have a strong preference and need for family sized 3+ bed semi-detached and detached housing. Whilst there is also some need for 1 and 2 bedroom flats and bedsits, this can largely be attributed to those who lack the means to purchase market housing or pay market rents. Need is not therefore translated into demand and this will continue to stifle the viability and deliverability of housing within the City Centre. A significantly lower and more achievable housing figure ought to be adopted for Bradford City Centre, with the bulk of the housing that is proposed not being expected until after 2020.</p>	<p>The strategic approach of allocating 3,500 houses to the City Centre AAP boundary area has been tested through the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Further work on the housing figure for the District has been carried out through an update to the SHMA and the Housing Requirement Study.</p> <p>The housing figure for the city centre</p>	<p>No action taken.</p>

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			is considered robust and will not change in the production of the Publication Draft document.	
	Mrs Slinger Resident	On the whole I support the ambitions of the Bradford Area Action Plan. However, the delivery of 3,500 new homes, as proposed by the Core Strategy Further Engagement Draft is unrealistic, in my opinion. This is because much of the need and demand for new housing in Bradford is driven and will continue to be driven by its community of south Asian origin, who have a strong preference and need for family sized 3+ bed semi-detached and detached housing. Whilst there is also some need for 1 and 2 bedroom flats and bedsits, this can largely be attributed to those who lack the means to purchase market housing or pay market rents. Need is not therefore translated into demand and this will continue to stifle the viability and deliverability of housing within the City Centre. A significantly lower and more achievable housing figure ought to be adopted for Bradford City Centre, with the bulk of the housing that is proposed not being expected until after 2020.	The strategic approach of allocating 3,500 houses to the City Centre AAP boundary area has been tested through the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA). Further work on the housing figure for the District has been carried out through an update to the SHMA and the Housing Requirement Study. The housing figure for the city centre is considered robust and will not change in the production of the Publication Draft document.	No action taken.
	John King Natural England	Natural England support the policy approaches to the protection and enhancement of the natural environment. Natural England particularly welcomes the integration of green infrastructure and promotion of biodiversity enhancement as important objectives within both AAPs. There are clear opportunities within the AAPs to provide access to natural greenspaces and enjoyment of the natural environment.	The Council welcomes Natural England's support for the Area Action Plan (AAP)	No action taken,
	Bob May Turley Associates on behalf of Westfield Shopping Towns Ltd	The report identifies that Bradford lacks a cohesive retail core with the shopping area spread out between Broadway, the Kirkgate Centre and Forster Square Retail Park. While the recent improvements to the shopping offer since 2005 are noted it should be more clearly recognised the future vitality of the city centre as a shopping destination is dependent on a far more substantial investment in the retail offer, including introduction of a full line department store into the city centre, to enable Bradford to retain a greater proportion of shopping trips and expenditure from within its catchment. Overall Westfield Supports the Council's aspirations for the regeneration of the city centre and particularly the need to address Issues 8, 9 , 10 and 18 in the proposed Area Action Plan. Westfield's proposed Broadway shopping centre development will significantly improve the shopping facilities in the city and it's integration with the existing pedestrianised streets leading to the Kirkgate Centre and prime retail area around Darley Street and Kirkgate will help to create a more cohesive retail core. Westfield expects Broadway to meet the demand for "open A1" retail within the plan period. However the expected increase in visitors arising from the improved retail offer should also provided opportunities for related catering, restaurant and leisure uses in the adjoining areas within the city centre, particularly in Broadway, Bank Street and Charles Street. The document highlights that, considering the size of Bradford City Centre, it is considered to be underserved by City Centre offices. Westfield supports the proposals to encourage additional new office accommodation in the city centre as well as the focus on significant	Bradford Council recognises the importance of vitality in the city centre, and will look to strengthen this issue in the Publication Draft document. The Council welcomes Westfield's support for the AAP.	Links to vitality strengthen throughout the AAP.

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		growth in the city centre living and encouraging growth of the night time economy and improve leisure facilities.		
	Mr & Mrs Shaw Residents	On the whole I support the ambitions of the Bradford Area Action Plan. However, the delivery of 3,500 new homes, as proposed by the Core Strategy Further Engagement Draft is unrealistic, in my opinion. This is because much of the need and demand for new housing in Bradford is driven and will continue to be driven by its community of south Asian origin, who have a strong preference and need for family sized 3+ bed semi-detached and detached housing. Whilst there is also some need for 1 and 2 bedroom flats and bedsits, this can largely be attributed to those who lack the means to purchase market housing or pay market rents. Need is not therefore translated into demand and this will continue to stifle the viability and deliverability of housing within the City Centre. A significantly lower and more achievable housing figure ought to be adopted for Bradford City Centre, with the bulk of the housing that is proposed not being expected until after 2020.	<p>The strategic approach of allocating 3,500 houses to the City Centre AAP boundary area has been tested through the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Further work on the housing figure for the District has been carried out through an update to the SHMA and the Housing Requirement Study.</p> <p>The housing figure for the city centre is considered robust and will not change in the production of the Publication Draft document.</p>	No action taken.

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	<p>David Lerner Aire Rivers Trust</p>	<p>Introduction. As the City Park brilliantly demonstrates, water, especially moving water, makes everybody happy. It always brings drama to an urban landscape and adds value to both commercial and domestic sites. The Bradford Beck is a (literally) hidden and unused asset whose potential for benefiting the City is rather being ignored by the present Town Centre Area Action Plan ABC. The Plan should commit itself to the deculverting of the Beck whenever there is a viable opportunity. This must become a planning condition for future developments and should come into force as soon as possible so that no opportunities are missed.</p> <p>Benefits A liberated Beck will present many opportunities for creating green areas in a city centre that, as the AAP notes, is uniquely deprived of public space.</p> <p>Bringing daylight to the Beck is a way of confronting the Victorian heritage that sometimes oppressively defines our city. It will provide a link with our more distant past and the eponymous 'Broad Ford' of our beginnings. Small-scale greening projects such as these E can generate a sense of excitement and appropriateness that often gets lost in the sheer scale and complexity of large urban developments.</p> <p>The AAP can only benefit from deculverting. As well as the aesthetic, wildlife and ecological benefits, there are practical arguments for releasing the Beck from its present confinement.</p> <p>Our Victorian forefathers were confident builders; but this does not mean that 150 year old tunnels will last forever. Appendix 1 has pictures of Spencer Court, Newcastle, a disaster caused by a blocked culvert.</p> <p>Culverts must be regularly, – and expensively –, inspected. Maintenance is essential because blockages from a partial collapse or the build up of detritus will force flood water back up-stream. Pictures of the present state of the Bradford culvert are in Appendix 2.</p> <p>Presently the city centre is protected from flooding by a diversion tunnel which bypasses the culverted part of the Beck's course. However the increasing demands of urbanisation (some proposed by the AAP itself) and the higher expectations of flood protection are all aggravated by rising flood volumes driven by climate change. At some stage capacity will need to be increased. Deculverting is lower in cost and ecologically sounder than digging another diversion tunnel or enlarging the present culvert. See Appendix 3.</p> <p>There are other, perhaps unexpected, community benefits. Convincing evidence shows that deculverting reduces anti-social behaviour and makes people feel safer. A useful side-effect in a brownfield landscape.</p> <p>Background. For the city centre portion of the Beck's course it really is a case of out of sight, out of mind. In its lower reaches the Beck is more or less constantly above ground and, as a result, the Canal Road Corridor Plan pays attention to the Beck and its future. Extending the Canal Road thinking to the covered parts of the Beck will ensure a consistency of approach that will support the work done further downstream.</p> <p>The deculverting idea is not new. Really good ideas seldom are. It can also be found in the BCCAAP 2003 City Centre Masterplan produced by Alsop Architects which was accepted by the Executive in the October of that year. Also in March 2005 the Regulatory and Appeals Committee resolved that it should be treated as a material consideration in the determination of planning applications.</p> <p style="text-align: center;">Bradford City Centre Area Action Plan: Further Issues and Options Consultation (February 2013 – May 2013)</p> <p>The present AAP builds on this legacy. The Core Strategy envisions a future Bradford J where 'A greening of the city centre has occurred ... mitigating the effects of climate change in the city centre. The reopening of sections of the Bradford Beck, Becks Park, and The Channel</p>	<p>The Council has explored the reopening of the Bradford Beck within the City Centre through work on the Green Infrastructure Study. This has been taken forward in the form of Policy M6.</p>	<p>Please see Policy M6 and Bradford City Centre Green Infrastructure Study.</p>
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General Comments				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Graham Lamb GL Hearn On behalf of Kirkgate Bradford Trust Unit	<p>Key themes</p> <p>The document goes on to list seven key themes to identify the specific issues facing the City Centre, and set out a number of objectives and potential policy options to address these. 'Shopping and Leisure' forms the second of these key themes (Pages 55-57), with Objective 1 seeking "a unique, high quality shopping and leisure experience reflecting the city's cultural mix". Paragraph 4.14 also notes that Bradford "lacks a cohesive retail core with the shopping area spread out between Broadway, the Kirkgate Centre and the Forster Square Retail Park." Issue 8 concerns the extent of the Primary Shopping Area and proposes an option that supports the previously defined boundary, but retains a flexible approach to the designation of primary and secondary frontages.</p> <p>Objective 7 is included in both the 'Shopping and Leisure' and 'Movement' themes, seeking "easy access to and around the centre for all sections of the community, and a reduction in problems caused by through traffic problems". Issue 9 relates to connectivity and notes that the AAP will follow the guidance of the City Centre Design Guide in regards to improving signposting and way-finding, and that the West Yorkshire Local Transport Plan 3 (LTP3) will be the primary delivery mechanism for improving connectivity between the main shopping areas.</p> <p>We are also in agreement with the vision of the 'Shopping and Leisure' theme, to establish a more cohesive retail core by applying a flexible approach to the designation of frontages within the primary shopping area; and by improving pedestrian connectivity and way-finding between the main retail destinations.</p> <p>However, notwithstanding our client's general support for the overall vision, objectives, strategic approach and key themes of the plan, there are several areas that will require further detail and clarification in future versions of the AAP.</p> <p>Areas requiring further detail and clarification</p> <p>Firstly, I refer to key development site M/1.1 'Former Rawson Market and Car Park, Simes Street' within the Market area, which is proposed for residential led mixed use scheme with ancillary leisure and retail floorspace. This section provides little guidance on the proposed redevelopment, and raises a wider issue of how markets are dealt with throughout within the City Centre AAP and wider Local Plan.</p> <p>We believe the AAP may benefit from a co-ordinated strategy towards markets incorporating the expertise and resources of 'Bradford & District Markets 2013' organisation, thought to be part of the Council, with particular reference to the markets in the Kirkgate Centre and Oastler Centre.</p> <p>An example of the importance of markets can be seen in Manchester, where the 'Manchester Markets' organisation (also part of the Council) has been very successful in recent years in managing new and existing markets throughout the City Centre and wider borough, to drive regeneration. These include seasonal markets such as the Christmas markets, which draw huge amounts of visitors each December, and the permanent market at Piccadilly Gardens which draws in passing trade from the adjacent transport hubs. Please see the following link for reference- http://www.manchester.gov.uk/markets.</p> <p>Secondly, in respect of improving connectivity, we believe that Issue 9 does not go far</p>		
			The Council acknowledges the need enhance guidance on connectivity	See changes to Revised Movement Chapter.

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>enough, as it fails to provide any actual options for initiatives to improve connectivity between the major shopping destinations. It simply refers to the Street Design Guide; and states that improvements will be delivered through the West Yorkshire Local Transport Plan 3 (LTP3), which simply provides a basic framework for future transport initiatives, with little more than a page of guidance on connectivity.</p> <p>In terms of specific initiatives, the Bradford Property forum have previously suggested the use of moving pavements/ escalators etc, and we believe that such measures should at least be put forward as options, such that they can be investigated further, and subjected to the relevant cost-benefit analyses.</p> <p>Thirdly, we believe that parking provision within the City Centre needs significant attention. Within the 'Movement' theme section, Issue 18 notes that <i>"the existing car parks are spread throughout the centre in a random manner and there is currently no overall strategy for parking in the city centre"</i>. It also notes that many of the existing surface car parks may be subject to development interest going forward; which would lead to a shortage of parking. We agree with these statements, especially given that a large number of the key development sites put forward within the AAP are existing car parks.</p> <p>Potential option (a) proposes <i>"the inclusion of a car parking strategy and adopted parking standards policy in the AAP with reference to long stay, short stay, off-street, on-street, disabled parking, private and public owned parking. This would also establish car parking standards for all types of development within the city centre. If a park and ride system was to be developed, this would also be covered in the car Parking Strategy for the plan."</i> We would like to support this option, but believe that future versions of this plan should incorporate far more detail on the proposed parking strategy, potentially a draft of the document attached as an appendix or incorporated into the text. We also believe that this should be developed alongside wider improvements to connectivity, public transport and the City Centre's highway network.</p> <p>Conclusion</p> <p>Therefore in light of the above, on behalf of our client Kirkgate Bradford Unit Trust, we would like to support the overall vision for the Market Area, and for 'Shopping and Leisure' as a whole within the City Centre. However we also feel that several issues need to be clarified and addressed in far more detail in future versions of the plan; including a coordinated strategy for markets within the City Centre, specific options for connectivity improvements, and a detailed parking strategy.</p> <p>I trust that these comments are of assistance and will be used to inform the emerging AAP prior to subsequent consultations. I look forward to receiving confirmation that my client's representations have been duly received and registered. In the interim, if you require any further details, please do not hesitate to contact me at the above offices.</p>	<p>and will look to strengthen this in the Publication Draft Report. The Transport Study has assessed potential solutions and the findings / recommendations will be taken forward into the Publication Draft.</p> <p>In regards to the comment raised on car parking, the Council is committed to producing a car parking strategy for the city centre, which is currently underway. Detailed highways guidance has been inserted in the allocation statements.</p> <p>The Council acknowledges Kirkgate Bradford Trust Unit's support for Option A.</p>	<p>See revised allocation statements. Car Parking Strategy will be placed on the Council website once complete.</p>

BOUNDARY				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	<p>It is not clear why the Area Action Plan includes the mosque and the surrounding streets which lie to the north of Drewton Road. In view of the way in which the highway network severs this area from the remainder of the City centre and its current uses, it would seem that this area is not likely to be a key area in the regeneration of the City centre and could be excluded from</p> <p>Suggested Change</p> <p>Consider whether the extent of the Area Action Plan should be reviewed. The AAP. Conversely, there are other areas around the City centre which might have warranted inclusion within the Area Action Plan.</p> <p>These include:-</p> <ul style="list-style-type: none"> · The retail park at Forster Square whose connectivity to the Broadway Shopping Centre is likely to be a key issue. · The Little Horton Lane area with its concentration of Solicitors and other small offices. 	<p>The AAP boundary does include the Central Mosque.</p> <p>The AAP Boundary has been amended to include Forster Square Retail Park Phase 1.</p>	See amended AAP boundary in the Publication Draft.
	Craig Blatchford Blue Sky Planning on Behalf of BLD (Bradford) Ltd	<p>The proposed city centre boundary as shown on the main map (Page 20) and individual areas maps does not include Forster Square [retail park]. Given the role of that Forster Square performs in the city centre, and specifically Phase 1 given its direct relationship with inter alia, Forster Square Station and the provision of car parking specially linked to the City Centre, as a matter of principle we consider that it should be included in the City Centre boundary. This relationship was clearly acknowledged in the adopted UDP and in the Issues and Options version of the AAP. In our opinion, there is no reasoned justification to move away from this position.</p> <p>Notwithstanding the above, the fact that Forster Square, specifically Phase 1, is not included within the City Centre Boundary results in an arbitrary boundary. Areas within the adjacent Market and Channel sub areas which are contiguous or extend further north than Forster Square are included within the City Centre boundary. The clear impression one is given is that Forster Square has been specifically excluded without any clear or rationale justification.</p> <p>Therefore, we respectfully suggest that Forster Square is included within the City Centre boundary and included within The Channel sub area for its existing use (i.e. retail and leisure purposes). In the event the Council do not agree, we would request that Forster Square Phase 1 is included such that the revised City Centre boundary would run along Hamm Strasse and Phase 1 is allocated for continued retail and leisure purposes.</p>	The AAP Boundary has been amended to include Forster Square Retail Park Phase 1.	See amended AAP boundary in the Publication Draft.
	Matthew Naylor Keyland Developments Ltd	We support the City Centre boundary shown on Page 20.	The Council welcomes Keyland Developments Ltd support for the AAP.	No action taken.
	Bruce Barnes Resident	Yes, if this is a defined area for planning purposes such as the location of takeaways and cafe's with late licenses.	Noted.	No action taken.
	Dr G.J. Llewellyn	The Trinity Green and MacMillan sections of Bradford College and Laisteridge Lane and	Other than the inclusion of Forster	See revised City Centre AAP

BOUNDARY				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Resident	Trinity section of the University are not included. The new accommodation development at the junction of Park Road and Manchester Road is not included - possibly ALL the S-W sector could be included (to include St Luke's Hospital?) - the next 15 years could see big changes - St Luke's has stood the test of time.	Square Retail Park Phase 1, there will be no further changes to the AAP boundary as the Council is committed to a concentrated approach to regeneration in the city centre.	Boundary.
	NHR Smith Resident	Forster Sq retail parks should be included, as they have a significant impact on the city centre and ways should be found to "bridge the gap".	The AAP Boundary has been amended to include Forster Square Retail Park Phase 1.	See amended AAP boundary in the Publication Draft.

VISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	We support the draft Vision especially those aspects which relate to:- <ul style="list-style-type: none"> · The renovation and reuse of the historic buildings in Little Germany and Giotside. · New build design respecting the architectural heritage of the city. · The safeguarding of the City's important cultural assets. · The creation of new open spaces and public realm improvements. · The intention that the plan will build on and enhance the existing qualities of this part of the District. 	The Council welcomes English Heritage's support for the AAP.	No action taken.
	Andy Welsh Bradford College	While the Vision expresses a positive outlook for the future and pulls together a number of important strands it could benefit by mention of the city centre as a place to learn and gain new skills. It would also be useful to mention easy access to and around the city centre. In addition, "The plan will not create a new city centre , but will..." sounds negative and the sentence would much more readily support the aspirations of the city by dropping this part.	The Council acknowledges the importance of learning and skills, and will look to strengthen links to this theme within the Vision. The issue of not creating a new city but building on and enhancing existing qualities is an important one, and acknowledges the city centre has positive aspects which need to be recognised.	See revised Vision within the Publication Draft.
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	The Forum welcomes the draft vision and objectives stated at paragraphs 3.6 and 3.7 of the AAP. These are at the same time laudable and challenging: it is important that the key policies, plans and delivery mechanisms are of a sufficiently high quality to meet the challenges set by these objectives.	The Council welcomes the Property Forum's support for the AAP.	No action taken.
	Bev Lambert Environment Agency	We note that the vision does not include any reference to the natural environment. Whilst we recognise that within the CCAAP boundary there is limited green space, we would welcome the inclusion of and aspiration for protection and enhancement of existing environmental assets and even be more aspirational and look to create new environmental assets, such as the proposed Linear Park.	The Council recognises the important of the natural environment and has strengthened the link to this theme in the Vision of the Publication Draft document.	See revised Vision within the Publication Draft.
	Matthew Naylor KeyLand Developments Ltd	We are fully in support of the vision and objectives set out and are keen to help the Council achieve these targets.	The Council welcomes Keyland Developments Ltd support for the AAP.	No action taken.
	Ivan Mack Resident	If the quality of the new build is similar to recent projects it will create an ugly city no different to any other in the country. Bradford's historic buildings need greater protection and serious and sustainable plans for re-use. Too much emphasis put on tired and out of date models of mixed use office/retail/residential that will cost the city dearly and almost certainly produce ugly empty blocks much like Leeds canalside.	The Vision makes reference to high quality design and the need to respect heritage. Design statements in the Publication Draft allocations will be strengthened and expanded upon.	See neighbourhood Spatial Frameworks.
	NHR Smith	Yes, but! I think Bradford needs to recognise that in conurbation terms it is linked to Leeds. Bradford	The Council acknowledges the	See revised Vision within the

VISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Resident	<p>needs to do what Leeds can't easily do. One area that Bradford can shine is to expand the cultural offer in the area around City Park, brand it as the Cultural Quarter, and promote it nationally and internationally. The former New Victoria (odeon) cinema should become a museum, ideally a national one (Liverpool and Manchester have national museums, so why not Bradford?). The 2 obvious candidates are a national peace Museum (there is already a small one, and Bradford Univ has what I think was the first peace studies dept in the country.) An alternative would be a museum of South Asian museum. These attractions would attract people into Bradford for something that other places cannot offer. Additionally, I'd like to see some of the treasures in the Bradford Museums and Art galleries collection brought into a city centre site - perhaps a conversion of part of the court building or the old police HQ as an alternative to demolition. In an age of global warming and consequent climate change, with all the disasters to human and other animal and plant life that that will bring, Bradford needs greater use of public transport, and improvements wherever appropriate. Bringing the private car into the city centre for work or leisure should be discouraged by proven methods. Bradford needs better connectivity with other parts of West Yorkshire, South Yorkshire, and the Harrogate district. This means the council should be pushing hard for an enhanced rail system. Firstly, the reinstatement of the Spen Valley Line, possibly for tram-trains which could then traverse the city centre (stopping near both City Park and Westfield) providing a link with the Airedale line, probably terminating at Shipley which could be renamed Shipley Interchange. There is space to construct a bay platform there. Alternatively, run through to Skipton, which would link the World Heritage Village of Saltaire and the Keighley and Worth Valley railway with towns such as Cleckheaton. An alternative to tram-trains is heavy rail, and a once in a century opportunity to connect the two railway lines across the derelict Westfield site is being missed through short-sightedness</p>	importance of the city's cultural assets, and has strengthened this theme in the Vision of the Publication Draft document.	Publication Draft.

OBJECTIVES				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	<p>Objective 2</p> <p>We support this Objective, especially the intention to continue the public realm improvements throughout the City Centre. An attractive environment and, especially, a high-quality public realm, has been shown to be one of the key components of a successful city centre.</p> <p>Objective 3</p> <p>We support this Objective especially the encouragement given to the reuse of the City's architectural heritage and the promotion of high-quality new design.</p> <p>Omission</p> <p>The Vision sets out an intention to offer a different experience from other cities. A key component of this experience is the quality and character which Bradford's heritage assets provide. Whilst Objective 3 addresses the reuse of the buildings, it does not adequately deal with the protection and enhancement of its legacy of heritage assets or the reinforcement of the distinct identity of the various parts of the plan area. It is essential that the Objectives of the AAP include an intention to ensure that this character is not lost. This might be addressed by an addition to Objective 1.</p> <p>Suggested Change:</p> <p>(1) Paragraph 3.7, Objective 1, line 2 amend to read:- " ... the city's cultural mix and its distinctive historic character"</p>	<p>The Council acknowledges the importance to protect the legacy of heritage and has strengthened the need to protect and enhance this theme in the Objectives of the Publication Draft document.</p>	See revised Objectives within the Publication Draft.

OBJECTIVES				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		(2) Paragraph 3.7, Objective 1, line 5 amend to read:- “ .. in the centre and by reinforcing the distinct character of the City and protecting and enhancing its rich heritage”.		
	Joanna Gabrilatsou Jones Lang LaSalle on behalf of Legal General	LGP concurs with the Council in that links are necessary between the higher education campuses and the rest of the city centre. The encouragement of development including residential property will help to better integrate the various quarters within the city so that the education campuses are not isolated from the rest of the city.	Residential and Mixed Use development is encouraged throughout the city centre. Links between the Learning Quarter and the rest of the city centre is covered in the Revised Movement Chapter.	No action taken.
	Andy Welsh Bradford College	It is good to see objective 6 – “An enhanced higher education campus...”. Objective 7 relates to easy access to and around the city centre and is, again, most welcome. In Objective 5 I would query the use of the term SMART Cities. It doesn't appear in the glossary and is written as an acronym. There is European funded project by the same name but perhaps the document is referring more generally to the use of technology to improve the life of the city. If this is the case then much more should be made of this given the 15 year timescale of the plan. There is a wide literature available on this subject, which I won't go into here, that suggests how technology can be used to improve the experience of living and working in cities as well as monitoring and shaping trends in how different parts of the city centre are used in a sustainable way by people and businesses. There is a good opportunity with this plan to use the social media aspect of 'Smart Cities' to capture information on what citizens think and to engage with them over the content of the plan.	Terms removed from the Publication Daft.	Objective 5 amended in light of comments made. (“technological improvements”)
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	The Forum welcomes the draft vision and objectives stated at paragraphs 3.6 and 3.7 of the AAP. These are at the same time laudable and challenging: it is important that the key policies, plans and delivery mechanisms are of a sufficiently high quality to meet the challenges set by these objectives.	Bradford Council welcomes the Property Forum's support for the AAP.	
	Bev Lambert Environment Agency	We would like to see the inclusion of using sustainable methods to remediate any historic contamination from previous uses of the land from the city's industrial heritage. Objective 8 – We suggest that there is scope for the AAP, particularly through this objective, to consider more closely how green infrastructure (GI) can play a part in helping to achieve Bradford's economic ambitions. For example GI can play a crucial role in helping to mitigate against some of the effects of climate change, such as increased surface water run-off and heat waves. Appropriately developed GI can help to make locations more attractive to inward investors and the provision of a high quality environment helps to retain existing businesses. Further on in the AAP, it is recognised that there are issues of poor air quality within the city centre, but there is no recognition of how GI can help address air quality issues. The objective should also include reference to the quality of life of workers in the city centre.	The Council acknowledges the importance of historic contamination in industrial heritage and will look to ensure these sustainable remediation methods are highlighted within the Publication Draft document. The Council acknowledges the importance of Green Infrastructure and will be examining this in the Green Infrastructure Study. The importance of Green Infrastructure in the City Centre will also be strengthened in the Publication Draft document,.	See amendment to Objective 3. See amendment to objective 8
	Matthew Naylor KeyLand Developments Ltd	We are fully in support of the vision and objectives set out and are keen to help the Council achieve these targets.	Bradford Council welcomes Keyland Developments Ltd support for the AAP.	
	Ivan Mack Resident	The current city centre environment is woefully lacking in vision and future plans seem consistently low in aspiration. We seem to never veer far from the mediocre through trying to emulate mediocre development in other urban areas. I'd push for a large scale abandonment	The Vision does contain an emphasis on the reuse of historic buildings, but the Council will explore the possibility	See amendment to Vision.

OBJECTIVES				
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		of new build, turn waste ground near to the city centre eg. Westfield site into parkland, and focus on preservation and re-use of the historic built city.	of strengthening this in the Publication Draft.	
	N H R Smith Resident	re & see my earlier comments. Public transport, cycling and walking - Yes. Increased car use - definitely not. Consider Park and Ride so that car users can park further out, but the key thing is to improve and expand the public transport offer through thinking big.	The Council acknowledges the importance of sustainable transport and will look to incorporate this into the Vision of the Publication Draft document.	See amendment to Objective 7

STRATEGIC APPROACH				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	Whilst in terms of the strategic planning, it is understood why the City Centre has been subdividing into the six neighbourhoods, the precise boundaries of some of the areas do not fit in particularly well with the way in which certain areas currently function or how they might be developed and planned in the future. For example, the boundaries between the Learning Quarter and The Valley are not so clearly definable. Not only does the Goitside area already contain a number of educational-related uses, but other uses associated with the University have already earmarked sites in this area (such as the former Beehive Works) for future student accommodation. In terms of the strategy for this part of the City, a less stark demarcation between the different neighbourhoods may encourage the University and college to invest in areas surrounding their current sites (and help deliver increased investor confidence in those parts of the District). In the case of The Market and The Channel, residential uses have already become established to the east of Manor Row and it is likely that this will become the dominant use for this particular part of The Market area over the plan period. Consequently, consideration should be given to having more "fuzzy" edges between the various areas (in a similar way to that used in the RSS for the various sub-Regional areas).	The Council acknowledges the unstructured reality of defined area of the city centre. The neighbourhood boundaries are considered indicative rather than absolutely definitive, and this will be made clear within the Publication Draft.	See neighbourhood Spatial Frameworks.
	Andy Welsh Bradford College	<p>It would be helpful if the section on The Bowl talked more about encouraging the movement of people between the Learning Quarter and the city centre. This potentially unlocks significant spending power for businesses in the city centre as well as making for easier access to the education facilities in the Learning Quarter.</p> <p>The Valley area is to be focused on residential developments but the previous emphasis on creating a linear park along the valley bottom appears to have diminished. The boundary appears to have extended into what was previously seen as part of the Learning Quarter area – see later comments.</p> <p>The College is perplexed as to the rationale behind the redrawing of the boundary to the Learning Quarter. The link to the Learning Quarter Neighbourhood Development Framework that is still live on the Council website shows the Learning Quarter extending down to the former Odeon site. It includes the Alsop school of the future site at the former Alexandra Hotel site. The proposed redrawing not only loses these two key sites that are essential to deliver the connection between city centre and campuses but it also removes elements of the College estate and other key sites. On the proposed redrawing of the boundary the following sites would be lost from the Learning Quarter: Arkwright Halls of Residence, Beehive Mills (a site identified in the AAP as additional student residence), Culture Fusion, the IFT Studio School as well as the following College buildings: Junction Mill, Garden Mill and the Appleton</p>	<p>The Council acknowledges the importance of movement between the neighbourhoods and will look to strengthen this theme in the Publication Draft document.</p> <p>The Green Infrastructure Study has assessed the feasibility of the linear park within the city centre. The findings and results of which have been taken forward into the Publication Draft document.</p> <p>The Council acknowledges the changes to the neighbourhood boundaries from those depicted in the Alsop Masterplan.</p> <p>It is important to reiterate these are indicative areas, not land use planning zones in terms of defining areas for specific types of development.</p>	<p>See Learning Quarter Neighbourhood Spatial Framework.</p> <p>See Policy M6 and Vision.</p>

STRATEGIC APPROACH				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		building. The redrawing seems to isolate the Learning Quarter from the city centre as opposed to encouraging connections.		
	Bev Lambert Environment Agency	<p>Flood risk to the identified neighbourhoods should be considered. The baseline evidence document identifies the need for a detailed understanding of the flood risks to the city centre and there is no indication that this has been applied in detail for the identified development sites. As identified in the report, flood risk needs to be managed at a strategic level to lessen the risk of constraint to the regeneration of the city centre. We would wish to discuss with the LPA how this will be achieved before the next round of consultations takes place.</p> <p>The Council will need to demonstrate that the flood risk sequential test and exception test (where required) have been applied and passed. Not only is this a requirement of the NPPF, but it will help to provide certainty to developers, investors and landowners and will provide a degree of information about mitigation measures that will be required if the aforementioned tests are passed. All neighbourhoods with the exception of the Market are identified on the Environment Agency maps as having flood zone 3 within them. There is also a need to consider climate change in line with the SA objectives.</p> <p>We welcome the aspirations to incorporate open space within the site specific descriptions. We recommend that Bradford Beck is identified in descriptions where it runs through any of the sites, for instance it is not mentioned in site B/1.7 – the Beck runs in culvert underneath the site. There could be specific flood risk issues that should be highlighted.</p> <p>We note the Council has aspirations to create a linear park along the Thornton Road Corridor, possibly incorporating water features. In order to secure the future for a linear park we recommend that the council considers including a policy rather than just an aspiration as this would be much more likely to be developed.</p> <p>When assessing the feasibility for redevelopment of the sites identified, the Council will need to consider risks from potential historic land contamination. This is particularly important for sites CH/1.1 (historic landfill), V/1.2 (former gas works and foundry) and V/1.9 (former petrol filling station). Guidance on the approach for assessing land contamination is given in our documents Guiding principles for land contamination (GPLC) which are available at http://www.environment-agency.gov.uk/research/planning/121619.aspx</p> <p>Key Theme – City Living The issue of flood risk and climate change impacts to the location of new development and facilities has not been addressed. The issue of how to facilitate the required development whilst providing the openspace needed by residents along with enhancement of habitat and wildlife is not addressed. No reference is made to green space or the incorporation of biodiversity enhancements into new developments. We feel that in urban areas, inclusion of green infrastructure which allows people to interact with nature is especially important. Consideration should be given to how to incorporate the key tenets of objective 8 into the theme.</p>	<p>The Council acknowledges the importance of assessing flood risk in the city centre. This has been assessed through the Strategic Flood Risk Assessment, the results of which have been taken forward in the Publication Draft document, with details of flood risk stated within allocation statements, and proposed planning policy.</p> <p>The Council acknowledges the importance of Green Infrastructure and this has been examined in the Green Infrastructure Study. The importance of Green Infrastructure in the City Centre has been strengthened in the Publication Draft document.</p>	<p>See Strategic Flood Risk Assessment Level 2, Policy CL2 and guidance within Allocation Proposal Statements.</p> <p>See Policy M6 and Vision.</p>

BOWL PROPOSALS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	<p>B/1.1 Wilson Street Car Park Removal of the surface car park and the redevelopment of this site would provide an opportunity to knit the townscape of this part of the City back together.</p> <p>20 Little Horton Street, at the eastern end of this site, is a Grade II Listed Building. There is a requirement in the 1990 Act that “special regard” should be had to the desirability of preserving Listed Buildings, their settings, or any features of special architectural or historic interest which they possess. The need to ensure that redevelopment of this area safeguards those elements which contribute to the significance of this building should be specifically referred to within the justification.</p> <p>This site also lies in the Little Horton Lane Conservation Area. Whilst we welcome the intention to retain and reuse the existing buildings on this site and the specific design requirements which are set out in the supporting text, reference should also be made to the need for the development to safeguard the character of this part of the Conservation Area.</p> <p>B/1.3 Business Forest Phase 1 This site lies adjacent to the Grade I Listed City Hall. The site also lies within the City Centre Conservation Area. These should be referred to as part of the description of the site. The Design requirements for this site are a little confusing.</p> <p>For example:-</p> <ul style="list-style-type: none"> · It is unclear what sort of “contrast” might be acceptable which would also be likely to “enhance” City Hall. · Whilst the first sentence of the Section on Design requires the scheme to “enhance” the Grade I building, the second sentence only requires enhancement “if possible”. 	The Council acknowledges the importance of listed buildings and conservation areas within the city centre. This has been strengthened in the Publication Draft document.	See heritage guidance in Neighbourhood Spatial Frameworks
		<ul style="list-style-type: none"> · It is unclear what the sentence “will be of sufficient scale not to obscure” the City Hall means. Does refer to the main block of the building or simply its tower? · Given the topography of Bradford, the City Hall is visible from a large area of the City. Where are the “key vistas” which should be safeguarded? This site is a key location at the heart of the City centre. It is essential, therefore, that the development of this area helps to animate the area around the southern part of the City Park. <p>Consequently, we welcome the requirement in the second bulletpoint that ground-floor areas of this development must contain active frontages. Because of the importance of this area, a development brief should be produced to guide the development of this area. English Heritage would be pleased to assist in the development of such guidance.</p> <p>Suggested Change:</p> <p>(1) The Site – add the following additional Paragraph:- “The site lies opposite the Grade I Listed City Hall and within the City Centre Conservation Area”</p> <p>(2) Design – amend the first bullet-point to read:- “The proposed office development within the Business Forest will be of high- quality</p>	The Council acknowledges the importance of the Grade I listed	See amendments to B/1.3 Proposal Statement.

		<p>contextual design that responds sensitively to its setting adjacent to the Grade I Listed City Hall and its location within the City Centre Conservation Area. The height of any buildings will not compromise the dominance of the City Hall buildings or harm key views and vistas of the building. Where possible, opportunities should be taken to open up new views of the City Hall.”</p> <p>(4) Design - Add the following additional bullet-point:- “Because of the sensitivity of this area, a Design Brief will be produced to guide its development”.</p> <p>B/1.5 Exchange Court This site adjoins the Grade II Listed Victoria Hotel. The site also lies within the City Centre Conservation Area. The presence of these heritage assets and need for the development to safeguard those elements which contribute to their significance should be referred to within this Section. The current cinema complex (The Leisure Exchange) whilst close to Bradford Interchange, is somewhat divorced from the main retail area and, with its own multi-storey car park, does not particularly encourage people to use the city centre as part of their visit to the cinema. Consideration might be given to how the development of this site might assist in helping to better integrate The Leisure Exchange with the remainder of the City Centre. This could involve limiting vehicular access of Vicar Lane to make it more pedestrian friendly.</p> <p>In terms of the potential uses on Site B/1.5, consideration should be given to the possibility of also using the site for some leisure activities. These would help to better connect The Leisure Exchange with the heart of the City.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following additional sentence:- “The site lies within the City Centre Conservation Area and adjacent to the Grade II Listed Victoria Hotel.”</p> <p>(2) Design - add the following additional bullet-points:- “Any development should have regard the principles set out in the City Centre Conservation Area Assessment and Conservation Area Appraisal” Proposals should safeguard those elements which contribute to the significance of the adjacent Listed Building. Consideration should be given to how the development of the site could better connect and integrate The Leisure Exchange with the main part of the City Centre”.</p>	<p>building City Hall and the City Centre Conservation Area, and the need to ensure any new development does not compromise the architectural and historical context of the building and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p> <p>The Council acknowledges the importance of the Grade II listed building Great Victoria Hotel and the City Centre Conservation Area, and the need to ensure any new development does not compromise the architectural and historical context of the building and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p>	<p>See amendments to B/1.5 Proposal Statement.</p>
		<p>B/1.6 Former Yorkshire Water Depot This site lies to the south of the Little Germany Conservation Area. It is important that the redevelopment of this site also has regard to the potential impact that it could have on the character of Little Germany particularly on views out of the Conservation Area towards the former Yorkshire Water Depot site. This aspect is not particularly well reflected in the development requirements.</p>	<p>The Council acknowledges the importance of the Little Germany Conservation Area, and the need to ensure any new development does not compromise the architectural and historical context of the buildings and</p>	<p>See amendments to B/1.6 Proposal Statement.</p>

		<p>Suggested Change:</p> <p>(1) The Site – Add the following additional sentence:- “The site lies opposite the Little Germany Conservation Area.”</p> <p>(2) Design – amend the first bulletpoint:- “... enclosing the surrounding streets. Particular regard should be had to the impact of the development upon the character of the Little Germany Conservation Area, especially those views from within the Conservation Area that look across this site”.</p> <p>B/1.7 Former Bradford Odeon, Princess Way There are a number of Grade II Listed Buildings surrounding this site including the Alhambra Theatre and the warehouse opposite the former Gaumont Theatre (to the south), and the former warehouses at 8 to 24 Quebec Street (to the west). The site also lies within the City Centre Conservation Area. We support the Design proposals for this site especially the possibility of retaining elements of the former Bradford Odeon and the requirement for development proposals to respond sensitively to the surrounding Listed Buildings. The description of the site, however, should alert those reading the document to the proximity of these heritage assets.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following additional sentence to the first Paragraph:- “There are a number of Listed Buildings to the south and west of the site, including the Alhambra Theatre, and it also lies within the City Centre Conservation Area”</p>	<p>area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p> <p>The Council acknowledges the importance of the Grade II listed buildings Alhambra Theatre and Warehouse and the City Centre Conservation Area; and the need to ensure any new development does not compromise the architectural and historical context of the building and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p>	<p>See amendments to B/1.7 Proposal Statement.</p>
	<p>Andy Welsh Bradford College</p>	<p>Site B/1.7 – the former Odeon building – is probably the key site in the Bowl in terms of ensuring and encouraging that connectivity. While it is important to give City Park a ‘sense of enclosure’ an unsympathetic development on this site could discourage the movement of people into the city centre and this should be reflected in the design bullet points.</p>	<p>The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p>	<p>See amendments to B/1.7 Proposal Statement.</p>
	<p>Matthew Naylor KeyLand Developments Ltd</p>	<p>We support the inclusion of site B/1.6 – Former Yorkshire Water Depot, within the consultation document. This is a brownfield site within the city centre in need of regeneration. However, we do have some suggested amendments to the description of the site and concerns prescribing such a specific use. Suggested amendments below:</p> <p>The Site – The site was previously occupied by Yorkshire Water with their George Street Offices and Laboratory. The offices are now part occupied by Citizens Advice Bureau. The site has outline planning permission for a mixed use scheme comprising of B1 Offices, C3 (400 apartments) and small scale A1, A2, A3, A4, D1 and D2 uses.</p> <p>The site is expected to deliver a mixed use scheme.</p> <p>We support the design and parking sections.</p> <p>Minimum Expected Development Threshold – While it is unlikely the current planning permission will ever be delivered Keyland would like to see more flexibility in this section. This will allow the site to respond to what the market requires in the area and can be designed to fit in with the design policies and other relevant policies within the AAP, Core Strategy and NPPF. We do not know how much floorspace for each use will be suitable at</p>	<p>The Council has considered broadening the proposed uses of the site within the Publication Draft allocations, in light of these comments and approved planning consents.</p>	<p>See amendments to B/1.6 Proposal Statement.</p>

		<p>this site yet.</p> <p>Existing Use – Offices part occupied by Citizens Advice Bureau</p> <p>Proposed Allocation – Mixed Use</p> <p>The reason for the change to the proposed allocation is to allow adaptability for market conditions.</p>		
	<p>Elizabeth Hubbard</p> <p>Resident</p>	<p>Site B/1.7 – Former Bradford Odeon Building</p> <ol style="list-style-type: none"> 1. I'm certain all the Bradford Councillors will believe Bradford is a metropolitan of talented cultural diversity? Right? But are all the Council willing to prove that this is so?! 2. The 'old new vic / Odeon ballroom floor to be brought back to former excellent condition plus retaining certain rows of permanent seats. 3. Use as a ballroom to begin again! Covering the dance area with non-slip material so other uses available. 4. Most seating to be removable well made, light but firm. 5. Because 'Odeon' would be for public use notices to be sent out to all council tax payers in the whole district declaring opening for public use. Notice could be given technologically as well as by post? To accompany 'public use' notice could council make appeal for as many people as possible to donate something towards same? (I believe strongly that many older people indeed many old folk still ballroom dance and dance modern etc too and would be glad to make a donation). 6. The accent Bradford's cultural diversity (bar to serve non-alcoholic drinks, tea, coffee, fruit drinks, pop etc so as not to offend folk of asian or other ethnicity, belief, culture etc. 7. For accentuating cultural diversity – for a very moderate charge – invite groups of any ethnic background to exhibit, dance, act etc so as to inform the 'host' community more fully. 8. Larger exhibitions and larger events could and should be held at the Odeon. Didn't the Beatles appear at the 'New Vic' in the sixties? I was there, wow!! (What about Simon Cowell and others events. Talent, Bradford's. 9. I trust the Central Library will continue to be used as a library despite present set backs. Should this not prove to be the case. A part of the Odeon could be used as a library?? 10. Could there be a small restaurant serving moderately charged meals for all? 11. Could dancing schools and schools of all types use a stage (The Alhambra's fees for such groups proves quite expensive. The Odeon could attract! 12. As well as St. Georges Hall, the Odeon could be a venue for craft displays, musical talent (young and older). 13. "Question and answer" evenings whereby a forum or other group / individual could provide the ethnic mix in understanding more fully the beliefs, traditions, food, backgrounds, dress, of all or most Bradfordians. 14. As well as dance schools , what about local youth bands or local 'pop' types groups being able to perform? 15. The Dales on the door step! Tourist too! Let's attract them. <p>All the above suggestions could provide a small fee for appearing? Also a small charge for all on entry?</p> <p>I do realise that some of these suggestions will not meet with approval but I do believe there are many Bradfordians who wish to see the Odeon retained for use. Bradford has no building like this one, none at all.</p> <p>I pray for wisdom, patience, skill and enthusiasm in all this lovely building's (please god) future, and the Odeon. Bless the cultural diversity of Bradford's people.</p>	<p>The Council will consider all planning related comments within this representation; however, many of these comments do not fall within the remit of the forward planning system.</p>	<p>No action taken.</p>

CHANNEL PROPOSALS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith	CH/1.1 Area West of Valley Road		
	English Heritage	<p>The buildings on the southern side of Holdsworth Street are Grade II Listed. These buildings also denote the northern edge of the Cathedral Precinct Conservation Area. It would be helpful to include a Section describing the site (as has been done elsewhere) making reference to the presence of these heritage assets. The section on Design should include a requirement that development proposals should ensure that those elements which contribute to the significance of these heritage assets are not harmed.</p> <p>Suggested Change:</p> <p>(1) Add an additional Section setting out a description of the Site which includes the following:- “The buildings on the southern side of Holdsworth Street are Grade II Listed and they also denote the northern edge of the Cathedral Precinct Conservation Area”.</p> <p>(2) Design – Add an additional bulletpoint along the following lines:- “Proposals for the development of the southern end of the site will need to ensure that they relate sensitively to the character and setting of the adjacent Listed Buildings and the Cathedral Precinct Conservation Area”.</p> <p>CH/1.2 Royal Mail Sorting Office</p> <p>This site lies between the City Centre Conservation Area (the boundary of which it adjoins) and the Cathedral Precinct Conservation Area. We welcome the requirement that development should respond to the surrounding historic context and retain the walls of the former Midland Railway Station (which make a considerable contribution to the townscape character of the surrounding area). However, the description of the site makes no mention of these assets and the Section on Design principles would benefit from a slight revision to better articulate its intentions regarding these heritage assets.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following additional sentence to the first Paragraph:- “The site is located between two Conservation Areas and adjoins the Grade II Listed Midland Hotel”.</p> <p>(2) Design – Amend the sixth bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context ... etc”</p> <p>CH/1.3 Broadway Shopping Centre Site</p> <p>There are a number Listed Buildings surrounding this site and it also lies between the City Centre, Little Germany, and Cathedral Precinct Conservation Areas. Given the importance of this area to the delivery of the Area Action Plan and its sensitivity in terms of the historic environment of the City centre, the AAP should include guidelines about how it is envisaged that the site will be developed. This would include consideration of how the development of the area might be used to open up/reinforce views and vistas across the City.</p>	<p>The Council acknowledges the importance of the Grade II listed buildings of Holdsworth Street and the Cathedral Precinct Conservation Area, and the need to ensure any new development does not compromise the architectural and historical context of the buildings and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p> <p>The Council acknowledges the importance of the Grade II listed Midland Hotel, City Centre and Cathedral Precinct Conservation Areas, and the need to ensure any new development does not compromise the architectural and historical context of the buildings and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p>	<p>See amendments to CH/1.1 Proposal Statement.</p> <p>See amended CH/1.2 Proposal Statement</p> <p>Due to the recommencement of development and the forecast completion of the Broadway Shopping Centre by November 2015, the proposed allocation of the site is no longer necessary and thus has been deleted.</p>

		<p>Suggested Change:</p> <p>Add description of the site and the design guidelines which set out how it is envisaged that this area will be redeveloped.</p> <p>CH/1.4 Cathedral Quarter Phase 1 This site includes two Grade II Listed Buildings (The Ring O’Bells public house (at its northern end) and Bradford College Cathedral Building (at its southern end) [although it is not clear whether Bradford College Cathedral Building falls within Site CH/1.4 or CH/1.5]). The southern part of the site, to the east and south of the public house, lies within the Cathedral Precinct Conservation Area. If the Bradford College Cathedral Building falls within this site, then it should be mentioned in the site description. The tower of the former school is a prominent local landmark whose dominance at this end of the site should be retained. If possible, opportunities should be taken as part of the development of this area to open up views towards it. The need for development proposals to safeguard the character of the Conservation Area should also be a requirement for the development of this area. One of the characteristics of development in the City Centre (which is noted in the Draft Baseline Report) is that taller buildings tend to be in the valleys with the numbers of stories in the buildings decreasing as they go up the hillside. In order to reinforce this aspect of Bradford’s character, the reduction in heights higher up the slopes should be a requirement not an option. In terms of the development of this area, you might consider using map regression to inform the layout of the blocks of development. This would help to reinforce the historic grain of the area.</p> <p>Suggested Change:</p> <p>(1) The Site - Amend the first Paragraph along the following lines:- “The site consists of a number of surface car parks. It contains two Listed Buildings and, at its southern end, lies within the Cathedral Precinct Conservation Area”.</p> <p>(2) Design – Amend the first bullet-point along the following lines:- “ ... the buildings should reduce in height further up the slope”.</p> <p>(3) Design – Add an additional bulletpoint along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context, and safeguard the character and setting of the two Listed Buildings. The tower of the former school should remain as a prominent local landmark at the northern end of this site”.</p> <p>CH/1.5 Cathedral Quarter Phase 2 It is not clear whether the Bradford College Cathedral Building falls within Site CH/1.4 or CH/1.5. If it falls within this site, then mention should be made of it within this site description. Even if the former school falls within the adjacent site, the development of Site CH/1.5 could impact upon the setting of this building so it should be referred to as a consideration when developing this area. In terms of the development of this area, you might consider using map regression inform the layout of the blocks of development. This would help to reinforce the historic grain of the area.</p> <p>Suggested Change:</p> <p>(1) If Bradford College Cathedral Building falls within Site CH/1.5 it needs to be referred to within the site description and the design principles (see above). (2) Notwithstanding the above, add the following additional bullet-point to the section on</p>	<p>The Council acknowledges the importance of the Grade II listed Ring O’Bells and College Building, and Cathedral Precinct Conservation Areas, and the need to ensure any new development does not compromise the architectural and historical context of the buildings and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p> <p>The Council acknowledges the importance of Bradford College Cathedral Building. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p>	<p>See amended CH/1.4 Proposal Statement</p> <p>See amendment to allocation site mapping for CH/1.5</p>
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		<p>Design:- “The tower of the former Bradford College Cathedral Building should remain as a prominent local landmark at the northern end of this site”.</p> <p>CH/1.6 Burnett Street Car Park There is a group of Grade II Listed Buildings along the southern side of this car park. Paper Hall, on the opposite side of Barkerend Road, is a Grade II* Listed Building. The site also lies within the Little Germany Conservation Area. The presence of these heritage assets should be referred to as part of the site description. In addition, the need for development to have regard to these assets should be referred to as part of the design principles. One of the characteristics of development in the City Centre (which is noted in the Draft Baseline Report) is that taller buildings tend to be in the valleys with the numbers of stories in the buildings decreasing as they go up the hillside. In order to reinforce this aspect of Bradford’s character, the design principles should also provide advice on the height of buildings which would be acceptable on this hilltop location.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the beginning of the first Paragraph:- “The site lies within the Little Germany Conservation Area and there are a number of Listed Buildings in its vicinity”.</p> <p>(2) Design – Add an additional bulletpoint along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context, and safeguard the character and setting of the nearby Listed Buildings”.</p> <p>(3) Design – Add an additional bulletpoint which sets out guidance on the heights of any new buildings on this site.</p> <p>CH/1.7 Olicana House, Chapel Street There are Grade II Listed Buildings to the north, south and west of this building. It also lies within the Little Germany Conservation Area. We support the design principles set out for this site.</p> <p>CH/1.8 East Parade Car Park There is a group of Grade II Listed Buildings to the north-west of this building. It also lies within the Little Germany Conservation Area. We support the design principles set out for this site.</p>	<p>The Council acknowledges the importance of the Grade II listed on Burnett Street, the Grade II* listed paper, Little Germany Conservation Area, and the need to ensure any new development does not compromise the architectural and historical context of the buildings and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p> <p>The Council acknowledges the importance of the Little Germany Conservation Area and the Grade II listed building in close proximity to the East Parade Car Park. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p>	<p>See amendments to CH/1.6 Proposal Statement.</p> <p>See amended CH/1.7 and CH/1.8 proposal statements.</p>
	<p>Craig Blatchford Blue Sky Planning on behalf of BLD (Bradford) Ltd</p>	<p>CH/1.2 Royal Mail Sorting Office In terms of the various design criteria, we would comment as follows in the order in which they are set out in the AAP:</p> <p>British Land acknowledges the objective of a comprehensive approach to the development of the wider site (i.e. including the Station Car Park and Forster Court Compound). However, it is important to allow for development to come forward on a phased and separate basis in line with ownership and deliverability so as not to impose undue constraint on development of the site and there by potential stagnate its regeneration. The requirement (our emphasis) for a Masterplan to co-ordinate the development of the site may unduly frustrate or delay the delivery of regeneration. This would be contrary to the objectives of the National Planning Policy Framework to bring forward sustainable economic development. In our opinion, the AAP Site Allocation (subject to comment herein) would provide sufficient guidance and context to bring forward development without the need for a comprehensive Masterplan. Should the situation arise whereby comprehensive development including the other</p>	<p>The Council recognises the importance of delivery and difficulties of land ownership.</p> <p>The Council considers a Masterplanning exercise would be beneficial in delivering the best scheme for this site.</p> <p>The wall of the former Midland Railway Station is considered of local heritage importance and should be incorporated or retained in a new development.</p>	<p>No action taken.</p>

		<p>ownerships is either not possible or come forward as a future phase, British Land acknowledge that any scheme should not prejudice and ideally facilitate the ultimate delivery of these aspirations.</p> <p>British Land supports the initiative of improving north south links between the central shopping area and Forster Square. Indeed, this requirement serves to reinforce the important and well established role that Forster Square performs in the City Centre.</p> <p>The potential for east west links could be more difficult to achieve (particularly given another City Council aspiration (see below) is the retention of the former Midland Railway Station wall. However, British Land acknowledges that the potential for east west links should be explored.</p> <p>Agreed, wherever practical</p> <p>Agreed, wherever practical and having regard to the different land ownerships involved at St Blaise Way (Network Rail / Train Operating Company) and Lower Kirkgate (Westfield / City Council).</p> <p>It is accepted that the nearby Cathedral Quarter and Midland Hotel will be factors in considering the scale of development. However, the existing buildings on site and other development adjoining / in the vicinity (e.g. the b-direct office building fronting Forster Square) are also relevant and should be acknowledged.</p> <p>The wall of the former Midland Railway Station is not listed and stretches for much of the western boundary of the site. British Land acknowledges that the potential to incorporate the wall should be considered where this is practical and viable and it does not conflict with other objectives for the development of the site (e.g. the scope to improve east-west links).</p>		
	<p>Katherine Morgan DTZ on behalf of Royal Mail Group</p>	<p><i>CH/1.2 Royal Mail Sorting Office Site Size: 1.88ha Proposed Allocation: Retail / Office / Residential The Site: Royal Mail has recently undertaken a national review of their sorting facilities and real estate within the UK. It is the intention of Royal Mail to close the Bradford West sorting office (CH/1.2) and move operations to the Inkersley Road site.</i></p> <p><i>The site has therefore been put forward as a proposed allocation to ensure the sustainable redevelopment of the site.</i></p> <p><i>Design:</i></p> <ul style="list-style-type: none"> ▪ <i>Subject to viability and deliverability, the development of the Sorting Office site should potentially be considered in conjunction with the adjacent rail station car park and the Westfield site compound at Forster Court. A Masterplan will be required to may be produced to assist in the coordination of the comprehensive development of the wider site area.</i> ▪ <i>Any scheme should improve north-south pedestrian links between the central shopping area/Broadway and the Forster Square Retail Park and railway station.</i> 	<p>The Council consider a Masterplanning exercise would be beneficial in delivering the best scheme for this site.</p> <p>The wall of the former Midland Railway Station is considered of local heritage importance and should be incorporated or retained in a new development.</p>	<p>See comments above.</p>

		<ul style="list-style-type: none"> ▪ <i>The potential of creating east-west routes between the Cathedral Quarter and station should also be explored.</i> ▪ <i>New buildings should define the edge of the routes and should respond positively to the corners of Valley Road where it meets Lower Kirkgate and St. Blaise Way.</i> ▪ <i>Active ground floor frontages and improvements to the public realm should be provided on the key routes of St Blaise Way, Valley Road and Lower Kirkgate.</i> ▪ <i>The scale of new development should respond to the surrounding historic context of the Cathedral Quarter and the Midland Hotel.</i> ▪ <i>The wall of the former Midland Railway Station should be incorporated as part of any scheme.</i> <p>We note that the draft Area Action Plan provides an opportunity for feedback on suggested timescales for the development of draft allocations. It is considered that the mail centre site could be developed in the short term (i.e. within 5 years).</p> <p>For the period that our client continues to have an interest in the site, we would welcome the opportunity to engage with the Council on the ongoing preparation of the Draft Area Action Plan and be involved in the development of any Masterplan for the site and the wider area. We understand that any prospective purchaser(s) of the site will submit representations to this and future consultations, and would ask that the Council engages constructively with these parties.</p>		
	<p>Bob May</p> <p>Turley Associates on behalf of Westfield Shopping Towns Ltd</p>	<p>CH/1.2 Royal Mail Sorting Office</p> <p>Westfield Support the comprehensive development of the wider site including both the Royal Mail Sorting Office and the adjacent rail station car park and the Westfield compound at Forster Court. The document proposes a Masterplan for the entire area to coordinate the comprehensive redevelopment of the wider site (page 31). Westfield supports redevelopment being of a scale commensurate with the Midland Hotel and Cathedral Quarter. Given that Royal Mail has recently announced the closure of their facility and proposed disposal of their site it is important that the planning authority engages urgently with the land owners to develop a Masterplan for the site. Suitable uses could include B1 Offices and or Leisure with an element of A1 convenience, A2 or A3 floorspace.</p>	Noted.	No action taken.

MARKET PROPOSALS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	<p>M/1.1 Former Rawson Market and Car Park, Simes Street</p> <p>This site includes (at its northeastern end) the remains of Fountain Hall which is a Grade II Listed Building. This part of the site also lies within the City Centre Conservation Area. The United Reform Chapel (to the north-west of this site) is a Grade II Listed Building. The presence of these heritage assets should be referred to as part of the site description. We welcome the requirement that the former chapel should be retained if viable. However, the need for development to have regard to the Conservation Area and safeguard the setting of the Reform Chapel should also be referred to as part of the design principles.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “The north-eastern part of the site lies within the City Centre Conservation Area. The site includes the remains of the Simes Street Chapel, a Grade II Listed Building. The Reform Chapel, to the west of this site, is also Listed.”</p> <p>(2) Design – Add an additional bulletpoint along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context and safeguard the character and setting of the nearby Listed Buildings”.</p> <p>M/1.2 Car Park on the Site of Former Carlton Grammar School, Grammar School Walk</p> <p>This site adjoins the boundary of the City Centre Conservation Area. 32 Manor Row (to the south of this site) is a Grade II Listed Building. The presence of these heritage assets should be referred to as part of the site description. We welcome the requirement that development should respond sensitively to the buildings along Grammar School Street. However, this should be expanded to embrace the other heritage assets in the vicinity.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “The site lies within the City Centre Conservation Area and there is a Grade II Listed Building on the southern side of Middle Street.”</p> <p>(2) Design – Amend the third bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context and safeguard the character and setting of the adjacent Listed Building.”</p> <p>M/1.5 Former Tetley Street Shed, Tetley Street</p> <p>The site lies within the Goitside Conservation Area. This should be mentioned as part of the site description. We support the design principles set out for this site.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “The site lies within the Goitside Conservation Area”.</p>	<p>The Council acknowledges the importance of the Grade II listed buildings and the City Centre Conservation Area; and the need to ensure any new development does not compromise the architectural and historical context of the building and area as a whole. The Council has considered these comments and amended the allocation statements for the Publication Draft document.</p>	<p>See amendment to M/1.1 Proposal Statement.</p> <p>See amend to M/1.2 Proposal Statement.</p> <p>See amend to M/1.5 Proposal Statement.</p>

VALLEY PROPOSALS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	<p>V/1.1 Former Provident Financial Headquarters, Sunbridge Road</p> <p>The site adjoins the boundary of the Goitside Conservation Area. This should be mentioned as part of the site description. The need for development to have regard to the Conservation Area should be referred to as part of the design principles.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “The site adjoins the boundary of the Goitside Conservation Area”</p> <p>(2) Design – Amend the third bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context.”</p> <p>V/1.5 Yorkshire Stone Yard and Mill, Thornton Road / Lower Grattan Road</p> <p>The site lies within the boundary of the Goitside Conservation Area. This should be mentioned as part of the site description. The need for development to also have regard to the Conservation Area should be referred to as part of the design principles.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “The site lies within the Goitside Conservation Area”</p> <p>(2) Design – Amend the third bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context”</p> <p>V/1.7 – Standard Building, Sunbridge Road</p> <p>This site includes, at its northeastern corner, 147, 149 and 151 Sunbridge Road which are Grade II Listed. The site also lies within the boundary of the Goitside Conservation Area. We support the design principles set out for this site.</p> <p>V/1.8 – Land to the rear of Holmfield Court, Holmfield Street / Soho Street</p> <p>The Colonial Buildings, to the east of this site, and 102 to 106 Thornton Road, to the south, are Grade II Listed Buildings. The site also lies within the boundary of the Goitside Conservation Area.</p> <p>The presence of these heritage assets should be referred to as part of the site description.</p> <p>We support the requirement that the development should seek to retain and refurbish the mill buildings of value on the site. However, the need to also ensure that the development of this site conserves those elements which contribute to the significance of the adjacent Listed Buildings and the character of this part of the Conservation Area should be better articulated in the design</p>	<p>The Council acknowledges the importance of the Grade II Listed Buildings, and Goitside and City Centre Conservation Areas, and the need to ensure any new development does not compromise the architectural and historical context of the buildings and area as a whole. The Council will consider these comments when producing the allocation statement for the Publication Draft document. The allocation statements in the Publication Draft will be more substantial than those in the Issues and Options report.</p>	<p>See amendment to V/1.1 Proposal Statement.</p> <p>See amendment to V/1.5 Proposal Statement.</p> <p>See amendments to V/1.7 Proposal Statement.</p>

		<p>principles.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “The site lies within the Goitside Conservation Area and there are Grade II Listed Buildings to the east and south.”</p> <p>(2) Design – Add a third bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context and safeguard the character and setting of the adjacent Listed Buildings.”</p> <p>V/1.9 – Car Sales / Filling Station Site, Thornton Road</p> <p>8 to 24 Quebec Street, to the east of this site, are Grade II Listed Buildings. The site also adjoins the boundaries of the City Centre and Goitside Conservation Areas. Given its sensitivity in terms of the historic environment of the City centre, the Area Action Plan should include guidelines about how it is envisaged that the site will be developed.</p> <p>Suggested Change:</p> <p>Add description of the site and design guidelines which set out how it is envisaged this area will be developed.</p> <p>V/1.10 – Former Alexandra Hotel and Empire Cinema, Randall Well Street</p> <p>The site lies within the boundary of the City Centre Conservation Area.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “The site lies within the City Centre Conservation Area”</p> <p>(2) Design – Amend the first bullet-point along the following lines:- “The site lies within the City Centre Conservation Area and has an important frontage to Great Horton Road. Any development should respond sensitively to this in terms of building line ...etc”</p> <p>V/1.11 Sunwin House, Godwin Street / Sunbridge Road</p> <p>Sunwin House is a Grade II Listed Building. It also lies within the City Centre Conservation Area. We support the design principles set out for this site.</p> <p>V/1.12 Thornton Road / Water Lane</p> <p>The site adjoins (and at its southern end lies within) the boundary of the Goitside Conservation Area. This should be mentioned as part of the site description. The need for development to also have regard to the Conservation Area should be referred to as part of the design principles.</p> <p>Suggested Change:</p> <p>(1) The Site – Add the following to the end of the first Paragraph:- “Part of the site lies within the Goitside Conservation Area”</p>		<p>See amendments to V/1.8 Proposal Statement.</p> <p>See amendments to V/1.9 Proposal Statement.</p> <p>See amendments to V/1.10 Proposal Statement.</p> <p>See amendments to V/1.11 Proposal Statement.</p> <p>See amendments to V/1.12 Proposal Statement</p>
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		<p>(2) Design – Amend the third bullet-point along the following lines:- “The scale and design of new development should respond sensitively to the surrounding historic context”</p>		
	<p>Joanna Gabrilatsou Jones Lang LaSalle on behalf of Legal General</p>	<p>Site allocation details are provided for Sunwin House (V/1.11). Overall LGP agrees with the content of this allocation, however considers that additional detail should be included and additional uses identified as acceptable. The section proposed within the draft AAP is repeated below in italics with the following amendments proposed in bold:</p> <p><i>Site Size: 0.50 ha comprising 100,000 sq ft over five floors. Existing Use: Vacant former Department Store and service yard</i></p> <p>Proposed Allocation:</p> <p>Retail (Use Class A1 to A5) / Residential /Office (Use Class B1) // Hotel (Use Class C1) / Residential (Use Class C3) including Student Accommodation / Health and other Community Uses (Use Class D1) / Education (Use Class D1)/ Leisure (Use Class D2)</p> <p>The Site:</p> <p><i>The site currently consists of a Grade II listed former department store. Following the closure of the TJ Hughes in 2010, the retail unit has remained vacant. The movement of the retail core of the city centre away from this site, the premises are no longer expected to deliver a large scale comparison retail offer. The site continues to be an important part of the retail core of the city centre. If the Broadway scheme is delivered it is essential that, due to Sunwin House’s location, the site contributes to maintaining and enhancing footfall across the city and maintaining a balance of activity along Kirkgate. It should remain in the PSA as a secondary shopping frontage due to the site’s prominent gateway location linking the west of the city centre into the PSA. Retail and other town centre uses should be encouraged at the site.</i></p> <p><i>The proposed allocation is expected to deliver a mixed use scheme, which makes use of the Grade II listed building. The make-up of this mixed use scheme is presently open, with views on the best use of this heritage welcomed.</i></p> <p>It is LGP’s view that the wording deleted above is replaced as proposed in bold. The current wording suggests that future retail is dismissed by the Council. However, although Sunwin House is currently attracting little interest from retail operators there is always the potential that a retailer could be interested in all or part of the building. LGP is keen to encourage retail as well as other uses, particularly at ground floor level to maintain an active ground floor frontage. This approach is considered to be in line with the NPPF’s approach at paragraph 23 as the area of Sunwin House is currently experiencing some decline. Therefore by applying a flexible approach to the future of the site, the LPA can ‘<i>plan positively for their future to encourage economic activity.</i>’</p> <p>Overall, LGP supportive of the objectives of the AAP which seeks to deliver a strong city centre economy. This will assist in encouraging the delivery of suitable tenants at Sunwin House. However, LGP is keen to encourage additional information which will promote greater integration between the designated neighbourhoods. The six neighbourhoods are considered individually within the draft AAP report, but do not suggest at any point that the various proposed uses can overlap and integrate neighbourhoods. As explained above, Sunwin House is located within the Valley and abuts the Market Neighbourhood and the</p>	<p>The Council acknowledges the land owners wish to remain within the primary shopping, but additionally want the site allocated for various uses other than A1 retail.</p> <p>These comments have been considered in the production of the Publication Draft Site Allocations.</p> <p>However, it must be noted, the allocation of non A1 retail uses on a site whilst remaining the proposed Primary Shopping Area is unlikely to be in robust and sound. It is also key to acknowledge Sunwin House has an established use as A1 Retail.</p> <p>In regards to restricting land uses within the neighbourhoods, the neighbourhood boundaries are considered indicative rather than absolutely definitive and thus land uses would not be absolutely restricted in line with these boundaries. This will be made clear within the Publication Draft.</p>	<p>No action taken.</p>

		Bowl Neighbourhood and is close to the Learning Quarter Neighbourhood. It is recommended by LGP that a section is included within the draft AAP Report which clarifies that the recommended main uses for each neighbourhood are not restricted solely to those neighbourhoods. Sunwin House is located in a prominent gateway location which can provide the opportunity to link and integrate the identified neighbourhoods. If a single user retailer cannot be identified at Sunwin House, then a variety of active ground floor uses with alternative uses above ranging from a hotel, to offices to residential and other uses could benefit from close proximity to the Learning Quarter, to office and leisure development within The Bowl and to retail uses within the Market. Therefore flexibility should be emphasised and made explicit by the Council. This approach further reinforces the objectives of the NPPF which should be reflected in the AAP.		
	Andy Welsh Bradford College	V/1.10 – Former Alexandria Hotel Project V/1.10 would see 100 residential units developed on the site of the 'Former Alexandria Hotel, Randall Well Street' (nb should this not be Alexandra?). This causes the College grave concern. For many years the College has aspired to develop this site as part of a strategy it believes the Council shares ie to connect the campuses with the city centre. In fact the site was identified as a school for the future in the Alsop masterplan. The College still retains a desire to develop this site. Even if the College were not to develop this site it would be essential that any development fulfilled the desire expressed elsewhere in the Area Action Plan to improve movement between the Learning Quarter and city centre and also to allow for an expansion of the education facilities contained in the Learning Quarter.	Bradford College is correct in pointing out the mistake in the title of this land use allocation. The site is the Former Alexandra Hotel, not the Alexandria. As the site has now been developed, the allocation has been removed in the Publication Draft.	Allocation Deleted.

LEARNING QUARTER PROPOSALS		
Rep ID	Name / Organisation	Summary of Representation
		No Comments Received

SOUTHERN GATEWAY PROPOSALS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	Although there are no designated heritage assets in this area, there are, nonetheless, several attractive historic buildings. Consideration should be given to the possibility of retaining and reusing some of these structures where their retention could assist in giving this area a sense of identity.	The Council acknowledges the importance of retaining historic buildings within the Southern Gateway, and will explore the possibility of these being retain and reused in the Publication Draft site allocation.	See revised Neighbourhood Spatial Frameworks.

Issue 1: The Amount of New Housing to be located in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	Given the number of Listed Buildings in the City Centre and the amount of currently-underused floorspace which could, potentially, be reused/adapted for residential purposes, we welcome the acknowledgement that conversion of historic buildings will be one of the main sources of housing supply in the City Centre. [It is presumed that line 5 of the first Paragraph should refer to "conversion" rather than "conservation"].	The Council welcomes the support of English Heritage on this issue. It is unlikely the Council will hold back vacant sites to prioritise listed building conversions. The priority of	No action taken.

Issue 1: The Amount of New Housing to be located in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		In view of the amount of underused floorspace, consideration should be given to prioritising the reuse of the buildings that are already there (particularly in areas such as Little Germany and Goitside) before developing vacant sites. English Heritage would welcome discussions with the Council to explore the possibility of using Local Building Consent Orders under the new Act to help facilitate the reuse of buildings in those parts of the City where there are concentrations of Listed Buildings (such as Little Germany, Goitside and the Markets).	developing sites will likely be left to the market. The Council has also introduced Local Development Orders and Listed Building Consent Orders to encourage the reuse of Listed Buildings in the City Centre. The AAP supports the use of these orders.	
	Bev Lambert Environment Agency	We fully support the statement „ <i>Delivery of housing within the city centre will also aid in the important reuse of brown field land within the district</i> “. You should note that this process should include an assessment of any risks to the environment and how these will be addressed.	The Council acknowledges the importance of assessing risks to the environment and has strengthened this point in the Publication Draft document.	See Strategic Floodrisk Assessment, incorporating floodrisk in allocation statements and Policy CL2.
	Ivan Mack Resident	This statement is meaningless. The round the clock economy is only sustainable where supported by a round the clock culture. The only nighttime economies currently turning over in Bradford are those related to drink and drugs. There's no clear sense from this how you intend to create a place that people will want to live in when the only businesses you seem to want to support are bars.	The Council acknowledges the need to protect residential amenity of existing and proposed homes.	See Policy BF1 and BF2.

Issue 2: The Location of New Housing in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	It is not clear whether the chosen Option will only relate to sites which are proposed as allocations. A more appropriate approach would be to define which blocks of the City are preferred as future residential areas. This would then provide a framework for considering any applications for conversions which may come forward. As part of the spatial strategy for residential development across the City Centre, the plan also needs to take into account the opportunities provided by:- (1) The reuse/conversion of vacant upper floorspace above existing ground-floor commercial activities, and (2) The potential offered through the reuse of existing buildings which may become available through the possible contraction in the extent of the retail area.	The Council acknowledges the importance of reusing the upper floors of commercial premises and vacant buildings. This point has been strengthened in the Neighbourhood Spatial Frameworks and objectives.	See Neighbourhood Spatial Frameworks and objective relating to imaginative reuse of historic buildings.
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	Greater flexibility should be introduced into site designation so that in some locations a housing use is only seen as an option for the developer to consider alongside other uses. Market, delivery and viability reasons may suggest an alternative use mix is more appropriate.	All proposed land use allocations will be viability tested for the production of the Publication Draft document. The importance of delivery and viability will be strengthened in the Publication Draft document.	See Viability Assessment of the AAP and the revised Delivery Chapter.
	Bev Lambert Environment Agency	Attractive open spaces can contribute significantly to the shopping and leisure experience and can help attract visitors and investors. Objectives 2 and 8 could therefore both be included within this theme. It should also explain how to facilitate development without creating pollution impacts on the environment and therefore meet the requirements of the WFD where	The Council acknowledges the importance of contribution open space has on the shopping and leisure experience.	See insertion of objectives 2 and 8 in City Living Chapter.

Issue 2: The Location of New Housing in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		relevant.	The Council acknowledges the potential pollution impacts of new development upon the environment.	See Policy BF2 – Built Form and the Environment.

Issue 3: The Type(s) of Housing to be encouraged in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	We support the intention that the density of each allocation will be dependent upon local/site specific circumstances. This would help to ensure that new residential developments safeguard the distinctive character of the various parts of the City centre within which they are developed.	The Council welcomes the support from English Heritage on this Issue.	No action taken,
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	The Council will need to decide in consultation with developers what proportion of family housing might be realistically achieved in the City Centre given the past experience in comparable City Centres during stronger market conditions.	The Council will continue to work with developers and land owners (amongst others) in the production of the AAP.	No action taken.
	N H R Smith Resident	Yes, but the city centre has to be really attractive in every way. I also have concerns about transport. Will these city centre dwellers own cars - if so, where do they park them? This level of development should go hand-in-hand with public transport improvements, measures to increase road safety for pedestrians and cyclists (which means curbing Bradford's speeding petrolhead culture), and developing some type of car share scheme to provide easy access to cars by city centre residents when they need one.	The impacts of future planned development on the transport network have been assessed through the Transport Study, the results and recommendations of which have been taken forward into the Publication Draft document. In regards to the comment raised on car parking, the Council is currently producing a car parking strategy for the city centre. Car parking requirements for allocated sets will be set out within supporting statements in the AAP and the Core Strategy.	See Transport Study, Highways guidance in proposal statements and Revised Movement Chapter.

Issue 4: Affordability of Housing in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	Greater clarity is required at this stage of the plan-making process with regard to the extent to which affordable housing can realistically be delivered in the City Centre. Consultation with housing associations and consideration of the Council's own role as landowner and a potential provider need consideration alongside the economics of delivering market housing in the City Centre. At present and for the foreseeable future it is unlikely that the major housebuilders will be able to deliver affordable housing as part of a market development which is almost certain to rely on special funding mechanisms such as cross-investment.	The Council will continue to work with housing associations on this issue in the production of the Area Action Plan. The amount affordable housing in the City Centre is dictated by the Core Strategy.	No action taken,

Issue 5: Access to Primary Education

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	We would support an approach which encompasses Option (b) and (c). As part of the strategy for encouraging more people to make use of and visit the City Centre, consideration needs to be given to how future education provision can help bolster this part of the District. Thus, rather than a strategy whereby those living within the area covered by the AAP commute out of it each day to schools in the surrounding parts of the District, the possibility of new schools being created within or on the edge of the City Centre should be explored. By this means, not only it will help to create vibrancy in the heart of the City but also reduce the numbers of vehicular trips across Bradford.	The Council acknowledges the importance of accessible education in the City Centre.	See Policies CL4 and ED1.
	Joanna Gabrilatsou Jones Lang LaSalle on behalf of Legal General	LGP recommends that the suggested options a) to c) are replaced with: <i>'The Council will support the proposal for a primary school including a Free School, in the Area Action Plan if a site is identified that can be delivered where appropriate and sufficient demand is demonstrated.'</i>	The Council acknowledges the importance of accessible education in the City Centre.	See Policies CL4 and ED1.
	Ivan Mack Resident	I think it's very important for the credibility of the council that they do what is best for the education of the city's children and make a firm commitment to avoiding any new privately funded schools.	The Council acknowledges the importance of accessible education in the City Centre.	See Policies CL4 and ED1.

Issue 6: The Need for Healthcare Facilities in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	We would support Option (a). Not only are healthcare facilities an important part of a community but they can also encourage greater use and activity in an area. As part of the strategy for reinvigorating the heart of Bradford, consideration needs to be given to how the locations of such facilities might be used to help encourage activity in those parts of the City which are underperforming. In addition, the current changes which are taking place in the retail sector could result in a decrease in the number of retail units within the City centre and a consequential increase in the number of vacant premises. Consideration should be given to whether new healthcare facilities might be able to occupy any vacated premises and thereby help to retain some of the vitality of these areas.	The Council acknowledges support for Option A.	No action taken,
	Joanna Gabrilatsou Jones Lang LaSalle on behalf of Legal General	LGP concurs with the objectives of both Issues 6 and 7.	Noted.	No action taken.

Issue 7: The Need for Small-Scale Convenience Shopping in the City Centre

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Joanna Gabrilatsou Jones Lang LaSalle on behalf of Legal General	LGP concurs with the objectives of both Issues 6 and 7.	Noted.	No action taken
	Ivan Mack Resident	I think it's very important for the credibility of the council that they do what is best for the education of the city's children and make a firm commitment to avoiding any new privately funded schools.	Noted.	No action taken.

Issue 8: Extent of the Primary Shopping Area				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	<p>The existing retail area is spread across a large part of the City Centre. Within this area, the Baseline Report has indicated that there is already a high vacancy level. With the current changes that are taking place in the retail sector, it is almost inevitable that the AAP will need to plan for a contraction in the extent of the existing retail area in order to achieve a more focussed, vibrant, retail core. Such an approach has already been used in Sheffield.</p> <p>As part of such an approach, however, it will be necessary for the AAP to set out a strategy for managing the buildings and areas where retailing is no longer the principal land use. This may necessitate the plan specifying uses for particular blocks within the City centre.</p> <p>With the current difficulties facing retailing, it is becoming increasingly apparent that, in order for the traditional retail areas to succeed, strategies for these areas may need to be more flexible than they have done in the past. Thus the AAP is likely to need to make it easier for one use to change to another or to enable temporary uses, especially those which will assist the delivery of a vibrant City centre, to become established. However, it is essential that any increased flexibility does not compromise the "quality" that is on offer.</p>	The Council acknowledges the importance of planning for change in areas which may be affected by the recommendations of the AAP.	No action taken.
	Ivan Mack Resident	Encourage more take up of spaces in the current city centre by local independent retailers within the remaining exceptional architecture of the victorian city. Become a destination for independent shopping. There is no real need or demand for redevelopment of Broadway. A park is more likely to bring people into the city centre than another poor concrete hanger of national retailers. I can't believe with nothing to lose Bradford still seems hell bent on making itself like every other city centre in the land. DO SOMETHING DIFFERENT!!!	The Council is committed to supporting existing and promoting new independent retailing within the city centre. The Council also recognises the importance in the delivery of the Broadway Shopping Centre, which will aid in overcoming the underserved retail market of the city centre. The Council is committed to Broadway Shopping Centre scheme and will continue to support the delivery of the development.	No action taken.
	Bruce Barnes Resident	I'm not sure what is involved in this proposition.	The Council acknowledges the Primary Shopping Area may not have been explained in sufficient detail. Further clarity on this point has been made within the Publication Draft document.	See Policies SL1 and SL2.
	N H R Smith Resident	not sure. Quality and accessibility, plus unique offers are important as well as attracting major retail chains.	The Council acknowledges the importance of independent retailing and major retail chains within the City Centre.	No action taken.
	Joanna Gabrilatsou Jones Lang LaSalle on	Sunwin House sits within, but on the edge of the existing PSA. LGP accepts that if the Broadway retail scheme is delivered that this will create a step change in shopping patterns	Primary and Secondary Frontages have been set out in the Publication Draft. As Sunwin House sits outside the Primary	See Primary and Secondary Frontages within Shopping and Leisure Chapter.

Issue 8: Extent of the Primary Shopping Area				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	behalf of Legal General	<p>within the City Centre, such that the centre of gravity within the core shopping centre will shift eastwards towards the Broadway scheme. This will pull shopping activity further away from Sunwin House which is located to the west of the PSA. In considering the future of Sunwin House, a flexible approach should be promoted which will allow a range of acceptable uses. Ideally a new large format retailer would be welcomed to occupy the property, however it is unlikely that a large format retailer will be secured for this building.</p> <p>LGP therefore recommends that Sunwin House remains with the PSA. The LPA has indicated that primary and secondary retail frontages are unlikely to be defined within the city centre to encourage flexibility within the city centre and minimise restrictions on end uses. LGP concurs with this approach which will encourage a greater chance of occupation of vacant properties within the centre. However, should the LPA decide to adopt defined primary and secondary retail frontages, LGP strongly recommends that Sunwin House sits within a Secondary Retail Frontage. In terms of policy compliance, there is greater flexibility for LPAs to support a combination of A1 retail and other non-retail uses in secondary retail frontages at ground floor level, unlike a primary retail frontage.</p> <p>Of particular relevance in considering the future of Sunwin House in preparing this AAP, the following bullets are highlighted from Paragraph 23 of the National Planning Policy Framework (NPPF),</p> <p>It is therefore LGP's view that in preparing the PSA boundary, Sunwin House should have the flexibility to deliver one or more uses which can encourage re-occupation. It is possible that an A1 retail operator may occupy the building in full or in part, but within the current market this is not the case and the future of the economy remains unclear. Limited interest from prospective tenants is further compounded by the the age and configuration of the building adding to the constraints it faces. Many national retailers require large format footplates with open strong presence at store entrances. Internally the building has large floorplates, with escalators positioned centrally and store entrances are restricted with indirect views and routes into the main shopping floors. Alterations to store entrances is possible however, the store's Grade II listing limits the changes somewhat. Nevertheless the LPA has indicated that they are willing to be flexible in terms of use and alterations so that the building can be reoccupied and avoid falling into further disrepair.</p> <p>Retaining the site within the PSA will encourage a link across Kirkgate, one of the City's main retail thoroughfares, from the west at Sunwin House to the east at the Broadway scheme. This will help to maintain footfall through Kirkgate and across Sunbridge Road towards Sunwin House and to the wider neighbourhood areas. The flexibility that the PSA can provide by avoiding the primary and secondary shopping frontage definitions can further encourage greater occupation of units by not restricting them to A1 retail uses only and therefore enhance the vitality and viability of the city centre.</p>	<p>Shopping Area, it is not included in either Primary or Secondary Frontages.</p> <p>As stated previously, Sunwin House already has an establish use of A1 retail.</p>	
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	We would consider that a flexible approach should be applied to shopping frontage policy.	The Council acknowledges the need for a flexible approach and has considered this in the production of the Publication Draft document.	See Policy SL2.
	Bob May Turley Associates on behalf	A single option is identified, as adopting the boundary of a Primary Shopping Areas as set out in the Bradford District Retail and Leisure Study from 2008, with a flexible approach to primary and secondary frontages. We recommend that the AAP includes a clear definition of a	The Council acknowledges Westfield's preference for a clearly defined primary shopping area, with	No action taken.

Issue 8: Extent of the Primary Shopping Area				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	of Westfield Shopping Towns Ltd	Primary Shopping Area and that both primary and secondary frontages are defined within that Shopping Area to ensure the Council's position is not weakened when considering the sequential test and resisting inappropriate or harmful development on fringe sites.	primary and secondary frontages.	

Issue 9: Better connections between shopping areas				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English	One of the issues which the Area Action Plan has noted is the fragmented nature of the City centre (due, in no small part, to the road building schemes of the 1960s). This has made it particularly difficult for pedestrian movement around the City. Whilst there is a need for better connections between the various parts of the retail area (and we would endorse the good practice put forward in the City Centre Design Guide), there also needs to be better pedestrian connectivity between the retail areas and the other parts of the City centre. This is especially true of those areas which, in the future, could generate a large number of pedestrians (such as the Learning Quarter and the residential areas in Little Germany and Goitside).	The Council acknowledges the importance of connections between shopping areas and other non-shopping related areas in the city centre. The Council acknowledges the potential future connection problems resulting from increased pedestrian movements through the delivery of development in the City Centre.	See Revised Movement Chapter and Highways Guidance in the allocation proposal statements.
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	The statement made with regard to this issue does not go far enough. We would expect actual optional schemes for enhancing connectivity between Broadway and Kirkgate, Broadway and Forster Square Retail Park etc. With regard to the Broadway – Kirkgate connection the options should include various types of moving pavement/lift system/escalator. There are no clear aspirations here to guide developers.	The Council acknowledges the comments on the options not being strong enough. The Publication Draft includes specific policies on Movement. The Council will explore the use of moving pavement / lift systems / escalators to improve connections within the city centre.	See revised Revised Movement Chapter.
	Bob May Turley Associates on behalf of Westfield Shopping Towns Ltd	Westfield supports improved connectivity within the city centre, building on the recent public realm investment made by the Council in the city centre. In addition way finding from key arrival points is important and this should extend to visitors arriving in the city centre by all modes of transport, including rail and car.	The Council acknowledges the importance of way finding and has strengthened this point in the Publication Draft.	See Policy SL3.
	N H S Smith Resident	As I have said earlier, a much bolder approach to public transport development is needed.	Improvements to public transport have been assessed through the Transport Study, the results and recommendations of which have been taken forward into the Publication Draft document.	See Revised Revised Movement Chapter.

Issue 10: Expansion of the leisure offer in the city centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	It is clear that from the experiences of other towns and cities around the country (such as Exeter) that retailing, on its own, is not likely to be enough to deliver a successful, vibrant city centre. In the future, there will be a need for these areas to provide for an increasing amount of leisure-based development. Bradford City centre needs to become a "destination" rather than simply a shopping area. In order to achieve this, it is likely that leisure uses will become an increasing important component of the mix of uses within the city centre. In terms of the options put forward, the problem with encouraging leisure uses as a priority above other competing uses on allocated sites is that the current range of development sites identified in the AAP is not particularly well located with respect to either the existing or future	The Council acknowledge the importance and need for the leisure offer to be a more integral part of the city centre and has strengthened this through the Central Business and Leisure District Neighbourhood Spatial Framework. The Council acknowledges the	See Central Business and Leisure District Neighbourhood Spatial Framework. See Policy SL2.

Issue 10: Expansion of the leisure offer in the city centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>main retail areas. It would seem preferable, therefore, to promote leisure activities as a key supporting activity for the retail area.</p> <p>In several other City Centre redevelopment schemes, the local planning authority has sought to encourage greater activity by including uses such as multi-screen cinemas to support retail developments at the heart of their urban areas. The current cinema complex (The Leisure Exchange) whilst close to the Bradford Interchange, is somewhat divorced from the main retail area and, with its own multi-storey car park and associated food outlets, does not particularly encourage people to use the city centre as part of their visit to the cinema. Consideration needs to be given to how this facility might be better integrated with The Bowl and the remainder of the City centre.</p>	<p>supporting role leisure can play within the wider retail area of the city centre. The Council has strengthened this through the use of primary and secondary frontages within the Primary Shopping Area.</p> <p>The Council acknowledges the importance of access to existing leisure facilities in the City Centre and has strengthened this point in the Publication Draft.</p>	See Policy M1.
	Bob May Turley Associates on behalf of Westfield Shopping Towns Ltd	Three options are set out. Westfield supports the promotion of leisure uses in the city centre and the positive planning for such uses with allocations in appropriate locations.	The Council acknowledges Westfield's support for the allocation of site for leisure uses in appropriate locations.	No action taken.
	David Park Resident	I want the Odeon restored into something like it was when the New Victoria. Your Plan shows it that you want Grade A offices etc.	The Odeon site has been put forward for Music Venue and Leisure Complex in the proposed land use allocation in the Publication Draft. However, the Council will consider comments on alternative viable uses.	No action taken.

Issue 11: Promoting the evening economy whilst safeguarding the amenity of city centre residents				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ivan Mack Resident	Bars and club development has been a disastrously poor way of regenerating space in the city. The ghettoisation of leisure facilities will increase problems associated with drink and club culture and raise the costs of policing accordingly. A dispersed and smaller scale leisure scene focussed within residential areas helps leisure sites to be self policing as they conceptually belong to their neighbourhoods.	The Council acknowledges the potential negative effects of the night time leisure offer and the need to ensure this does not have a detrimental impact upon residential amenity and the city centre in general.	See Policy BF2 – Built Form and the Environment.
	Bruce Barnes Resident	Yes but only and only if there are no further developments of cafes, takeaways or shops with late night licenses outside the city centre and other defined urban centres.	The Area Action Plan will only form the planning legislation for the City Centre boundary, with no control outside of that area.	No action taken.
	David Park Resident	What did NES mean on previous question?	The Council is unaware of this acronym.	No action taken.
	N H S Smith Resident	sentence (b) doesn't make sense!	The Council will look to ensure the language used in the Publication Draft is clear and concise to avoid any misunderstanding, as expressed in this representation.	

Issue 12: Exploiting the city's cultural assets				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	Research has shown that successful city centres are those which offer the best "experience". With consumers becoming more discerning, quality is becoming increasingly important. The historic environment is a key element which can assist in making a visit to Bradford City centre a different experience to other places.	The Council acknowledges the importance of access in exploiting the city's cultural access. This shall be taken into consideration in production	See revised Revised Movement Chapter and Revised Shopping and Leisure Chapter.

Issue 12: Exploiting the city's cultural assets				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>Pedestrian connectivity between the newly-created City Park to two of the key cultural assets of Bradford (the National Media Museum and The Alhambra Theatre) involves crossing an extremely busy road. Consideration needs to be given to how the impact of this highway might be lessened in order to make the approach more attractive.</p> <p>More ought to be made of the fact that Bradford is a UNESCO creative city. For example, the Area Action Plan might consider if there are areas where creative hubs might become established and what opportunities there might be for the establishment of temporary uses linked to the UNESCO creative city.</p> <p>It should also be borne in mind that the city's cultural assets also include its numerous historic buildings. It is essential that the strategy ensures that those elements which give the various parts of the City Centre their unique character (and which play a significant role in helping to attract inward investment and visitors) are adequately safeguarded. Investment in the enhancement of the City's historic buildings and in improvement of the public realm can play a significant role in the realisation of the Vision for the City Centre.</p> <p>Within the Bradford MDC area, there are two cultural assets which attract large numbers of visitors – Saltaire and Haworth. The Council needs to explore how people visiting these attractions might also be encouraged to visit the City Centre. It is understood that the Bronte Parsonage has a large number of artefacts that it does not have room to display. What possibility is there of opening up a museum space in the City centre where these exhibits might be put on display?</p>	<p>of the Publication Draft document.</p> <p>The Council recognises the importance of the UNESCO status and will look to strengthen links to this status within the Publication Draft document.</p> <p>The Council acknowledges the interconnections between the cultural and historic assets in the city; and need to safeguard and enhance these connections.</p>	Added to the strategic objectives.
	Ivan Mack Resident	Broadly agree, but the focus on the city centre is sucking the hinterland and suburbs dry of council supported cultural activity. I'd rather see a scheme that incorporated better signposting and transport to sites outside of the city centre.	The Council acknowledges the importance of access to cultural assets outside the city centre. Access to other parts of the District from the City Centre has been picked up in the Revised Movement Chapter.	See Revised Movement Chapter.
	David Park Resident	Want existing Odeon building retained, but refurbished not changed to Grade A offices etc.	The Odeon site has now been forward for Music venue and leisure complex. However, the Council will consider comments on alternative viable uses.	No action taken.
	N H S Smith Resident	see earlier comments re developing a nationally important cultural quarter.	Noted.	No action taken.

Issue 13: The need to deliver forecast jobs growth within the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	The Plan needs to consider how the presence of the University and Bradford College might be better utilised to deliver the regeneration of the City. The Area Action Plan should examine whether there are parts of the City where small-scale business starter units or live-work units could become established connected to the two educational establishments.	The Council acknowledges the importance small business and their contribution to economic growth in the city centre. The Council has worked closely with education providers in the production of the Bradford City Plan, which is best placed for furthering these connections with the University and	No action taken.

Issue 13: The need to deliver forecast jobs growth within the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
			College.	
	Joanna Gabrilatsou Jones Lang LaSalle on behalf of Legal General	LGP concurs with the objectives of Issue 13. In particular the Option is supported which will allow the allocation of sites for employment uses such as office, retail and leisure within the AAP.	Noted.	No action taken.
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	The Forum agrees that the City Centre should be the main focus for major office, retail and leisure development. However, the translation of a large part of the 105 hectares of employment land to the City Centre is in our view ambitious and does not seem to match the allocation proposals in terms of their size and the primacy of housing as the main use in most cases.	The 105ha of employment land needed for the next 15 years to meet employment growth, as stated in the Core Strategy. The 105ha of employment land is not expected to be wholly delivered within the City Centre boundary, but instead will be delivered across the District as a whole. The Publication Draft puts forward an approximate jobs figure (for B1) to be delivered over the next 15 years.	See revised Business Chapter.
	N H S Smith Resident	but remember that a cultural quarter can give Bradford a unique offer which will make people want to live and work here - so ensure business use complements rather than jeopardises this.	The Council acknowledges the importance of the cultural offer contributing towards the meeting jobs growth in the city centre.	

Issue 14: Safeguarding the Campus Zone from Non-Educational Related Development				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	Future student accommodation has the potential to help regenerate the heart of the City. Such accommodation has already started to be developed on a number of sites within Goitside, which lies immediately adjacent to the Learning Quarter. Several currently-vacant or under-occupied buildings in Goitside (and, indeed, in other parts of the City Centre) would appear to lend themselves to student accommodation. Consequently, rather than concentrating future student accommodation solely in The Learning Quarter, consideration should be given to the potential for locating future student accommodation in Goitside and, where suitable locations exist, other parts of the City Centre. Sheffield has demonstrated how the expansion of a university campus at the heart of a City can be used to regenerate/revitalise other parts of that settlement. Where future educational accommodation is required, consideration should be given to the potential of locating some University/College Departments in areas outside the current Learning Quarter. The University is not only completely divorced from the centre of the city but also has little presence from the City Park. The Plan needs to consider how the educational quarter might be better linked to the Bowl. Could the former Bradford Odeon site become a gateway to the university and Bradford College?	The Council acknowledges the importance of the learning quarter being an integral part of the city centre and the potential need to see other areas (outside the Learning Quarter) promoted for education related development. The Learning Quarter shall remain as the primary focus for further and higher education, but the Council will support primary and secondary education other parts of the City Centre through Policy CL4 The Council acknowledges the importance of connections between the learning quarter and the rest of the city centre (especially the bowl) and will explore how these connections can be promoted and improved through the AAP.	See Policy CL4. See revised Revised Movement Chapter.
	Andy Welsh Bradford College	Key Theme 4 is specifically about Higher and Further Education and the Council should be applauded for identifying this as a key theme in its own right. At paragraph 4.26 the document refers to the College preparing ambitious plans. Given we are on site with £55m worth of	The Council acknowledges the importance of expanding of the knowledge and skills within the city	No action taken.

Issue 14: Safeguarding the Campus Zone from Non-Educational Related Development				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>development projects on the city centre campus this somewhat underplays what is actually being delivered.</p> <p>The Key Issue identified at para 4.29 is to safeguard the campus zone from non-education related development. The wording is defensive and seems to be a missed opportunity to spell out just what a well planned and connected city centre action plan could deliver. To my mind the Key Issues could be added to by stating a desire to be:</p> <ul style="list-style-type: none"> • Encouraging the expansion of knowledge and skills development in the city centre to support the necessary development of labour markets within the city but across the Leeds City Region • Attracting investment into the city from businesses that compliment the offerings of the College and University. <p>Issue 14 is also worded in a defensive manner ie "restricting development of uses which are not related to the activities of the institutions". Again, while the sentiment and support given to the institutions is welcome the wording could be much more positive and aimed to attract investment rather than to ward off unsuitable developers.</p>	<p>centre and the investment this will bring into the city.</p>	
	<p>Dr G.J. Llewellyn Resident</p>	<p>Having been involved with overseas students at both College and University there is a great scope for expansion/development - this is hampered by some pretty awfully maintained properties in the "V" between Little Horton Lane and Great Horton Road. This is a public health and road safety blackspot which puts off students from both home and overseas and needs to be dealt with in a pro-active manner (see previous comments linking in St Luke's which complements the rise in Health Studies at the University. Some overseas students are very wealthy so some high-end accommodation would be worth consideration in this enlarged area.</p>	<p>The area between Little Horton Lane and Great Horton Road currently lies outside the AAP boundary. However, the need for good quality student accommodation in the city centre is recognised and will be considered in the Publication Draft document.</p>	<p>See City Living Chapter.</p>

Issue 15: Quality and Availability of Pedestrian Routes				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Ian Smith English Heritage</p>	<p>We would support the adoption of the principles of the Streetscape Design Guide especially the use of the streets to reinforce the City's character. The creation of attractive public realm is an important component in developing a high-quality shopping and leisure experience.</p> <p>The Introductory Section of this Area Action Plan highlights the fragmented nature of the City Centre which makes it difficult for pedestrians. However, the AAP does not put forward any proposals to lessen the severance caused by the current highway infrastructure or ways in which connectivity might be improved. It is particularly important that the plan facilitates easier pedestrian movement between the Learning Quarter and the new residential areas and the heart of the City centre.</p> <p>The Plan also needs to address the extent to which there is vehicle penetration into the heart of the City. Consideration should be given to closing roads to traffic in order to create a more pedestrian-friendly environment.</p>	<p>The Council acknowledges the importance of good connectivity between areas of the city centre and need to address this issue.</p> <p>The Transport Study has assessed the existing and current transport / connectivity issues facing the city centre and put forward solutions to overcome them. The results and recommendations of the study have been taken forward into the Publication Draft document.</p>	<p>See Revised Movement Chapter.</p>
	<p>Richard Radcliffe</p>	<p>The City has 2 end-of-line railway stations that are close together but very poorly connected. Ideally both should be extended to give one central "through" station (perhaps a use for the</p>	<p>The Transport Study has assessed the existing and current transport /</p>	<p>See Revised Movement Chapter.</p>

Issue 15: Quality and Availability of Pedestrian Routes				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Resident	hole in the ground!). As this is unlikely improvements to both the pedestrian and vehicular linkage should be considered.	connectivity issues facing the city centre and put forward solutions to overcome them. The results and recommendations of the study have been taken forward into the Publication Draft document.	
	Jenny March Resident	this should include cyclists as well as pedestrians	The Council recognises the importance of cycling as a sustainable mode of transport, and improvement to cycle routes have been tested through the Transport Study, the recommendations of which have been taken forward in the publication Draft.	See Revised Movement Chapter.
	Dr G.J. Llewellyn Resident	The congregation of groups (especially young men) are perceived as a threat - especially to older folk - so the social aspect must be managed in such a way that Bradford develops a positive character which might encourage those who have deserted Bradford for Halifax (for example) to return.	The Council is of the opinion this is not a planning issue.	No action taken.

Issue 16: Provision of Public Transport Services and Infrastructure (including Taxis)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	<p>We would fully agree with the assessment that considerable work needs to be done to improve people's first impressions of the City when arriving by train, particularly at Bradford Interchange. (Option (c)).</p> <p>In the case of Bradford Interchange, any redevelopment of the station needs to include not just the station itself but also the townscape and approaches between the Station and the City along Bridge Street.</p> <p>In the case of Forster Square (which is the main link to the City centre from Saltaire) any redevelopment also needs to include an examination of how linkages to the City centre might be made more legible. At present, the current arrangements at the station tend to lead visitors out towards Valley Road.</p> <p>Consideration also needs to be given to how the two stations might be better linked to one another.</p> <p>We also support the development of Park and Ride facilities to help reduce the numbers of car journeys into the City centre.</p>	<p>The Council acknowledges the support for Option C.</p> <p>The AAP will support any potential redevelopment of the city's railway stations, as well as improving connection between them.</p>	See Revised Movement Chapter.
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	The statement with regard to the two railway stations and their detachment from the City Centre is agreed. However, with the exception of Option C relating to the potential redevelopment of Forster Square and the Interchange there are no real options beyond some fairly basic suggestions. The scheme to connect the two stations should remain an option for evaluation prior to final dismissal.	The Transport Study has assessed the connections between the stations. The results and recommendations of have been taken forward into the Publication Draft document.	See Revised Movement Chapter.
	Sharon Smart	If you are prioritising taxi's over general road users then i do not support this. General road	Taxi's as a mode of transport are	

Issue 16: Provision of Public Transport Services and Infrastructure (including Taxis)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Resident	user contribute more towards the pot of money available to bradford council more than taxi drivers who often live outside the city and should be given equal if not higher consideration.	seen as more sustainable due to the fact they are often carrying more passengers than general private car users. In line with traffic and highways regulation, taxi's will still be able to use bus lane and bus priority areas.	
	Graham Bentley Resident	Whilst supporting the general objectives in c), the longer term aim should be to link the two rail heads when funding can be sourced. The economic and movement benefits to the city would be enormous and would make a significant contribution towards the objectives in 17a). The prospective developers of the Forster Square site should be asked to safeguard the route within their plans before work starts which can still be done. This is a wonderful opportunity for Bradford which mustn't be missed.	The Transport Study has assessed the connections between the stations. The results and recommendations of which have been taken forward into the Publication Draft document.	See Revised Movement Chapter.
	Jenny March Resident	needs to be secure bike parking at stations	The Council acknowledges the importance of secure bike parking at the stations, and this will be incorporated into the future redevelopment of the stations	See Revised Movement Chapter.
	Dr G.J. Llewellyn Resident	It should not be necessary to take taxis between Rail Stations and the buses should be returned to an integrated bus station as originally conceived. I considered the link between Forster Sq and Interchange at your consultation with the aid of your maps - an extensive travelator/escalator link (via Westfield?) could be the answer as there are new developments in technology which could make this viable. Sheffield (Midland) has some grotty adjacent sites but the apron in front is uplifting and welcoming - surely the dreadful car park facing City Hall will need to be demolished soon thus opening up an equally welcoming view to Bradford (Sheffield has used Ian McMillan poetry - Hockney could be a theme to provide the link to your other area of concern (Shipley Corridor) via the World Heritage site at Saltaire. If the travelator system could link the art conscious areas along the Calderdale line with the Airedale lines, who knows, some might spend some time in the City. Your strategy needs a station at Low Moor and better links to Wakefield (now a cultural hub!) and Sheffield. The IMAX is now dated - 3-D has given way to 4-D and 5-D - this is where the Odeon comes in. Leeds seems to have won the shopping battle of the big brands - Bradford needs to build on all the visitors coming to the Media Museum - offer cheap, overnight accommodation with a show/concert/4-D + visit to Saltaire. I am concerned about the long-term viability of the on-line bus displays as they were obtained through special funding by Metro (so Metro has told me!) what happens when they are obsolete as they are vital to a well-used bus system. The Rooley area of Odsal is better served by buses to Leeds/Halifax than to the City Centre!!	The Transport Study will assess the connections between the stations and other potential transport solutions. The results and recommendations of which will be taken forward into the Publication Draft document.	See Revised Movement Chapter.
	N H S Smith	Join up the two rail networks either through tram trains or through a heavy-rail bridge across the Westfield site. A new station at Westfield could then replace forster Square, which would also be replaced by a new station at Manningham. North and South parts of the district, and beyond, would then be joined up.	The Transport Study will assess the connections between the stations and other potential transport solutions. The results and recommendations of which will be taken forward into the Publication Draft document.	See Revised Movement Chapter.
	Michael Long Metro	Bradford city centre has a number of bus and rail services that terminate or travel through the city centre. The city centre is therefore (as you would expect) the most accessible part of the city. As a result we accept the observation in the issue text in relation to the confusion for some public transport users to where they access bus services due to the number of buses that are available.	The Council will continue to work with Metro on production of the AAP.	No action taken.

Issue 16: Provision of Public Transport Services and Infrastructure (including Taxis)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>The routes and termination points in the city centre are generally determined by the area of the city the services originate and are able to circulate the city for the return journey. Ultimately there are only a limited number of routes through the city and kerb spaces where buses can terminate which restricts the opportunities to change the current patterns. Metro would oppose any reduction in kerb space for bus services without a suitable alternative being identified and agreed with operators. Metro will work with the council to see if any improvements can be made, particularly through the LTP Transport Hub programme in the LTP which aims to improve how services can be accessed.</p> <p>We have not provided comments on the specific land allocation proposals for the development land within the city in this AAP. However, it is important for Metro and operators to understand any implications these land use changes will have on passenger flows through the city.</p> <p>As commented in the Shipley and Canal Road AAP, the Forster Square Retail development underutilises its proximity to Forster Square station. To some extent by incorporating the Forster Square retail area into the city centre AAP area, could encourage more linked trips into the traditional city centre, especially when the Westfield development is completed.</p> <p>In relation to rail access into the city, the city benefits from 2 rail stations. The topography of Bradford has determined the alignment of these routes into the city. Metro would support (but can't guarantee funding) for improvements to both stations to improve the passenger experience for these gateways into the city. This includes support of better Taxi facilities at gateway sites. Connectivity between the stations is provided by the City Bus. We don't envisage a fixed link between these station in the plan period or beyond.</p> <p>Metro support the principle of Park and Ride where a positive business case can be demonstrated.</p>		

Issue 17: Air Quality Management				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	Compared to most Cities, there appears to be high vehicle penetration into the heart of the City with both on-street and off street car parking spread randomly throughout the central area. All this detracts from the attractiveness and pedestrian experience of the city. Consequently, we support all three options proposed to reduce the amounts of traffic and car parking.	The Council acknowledges English Heritage's support for all options.	No action taken.
	Michael Long Metro	<p>Metro would welcome in principle measures to improve air quality in the city centre. Reducing Vehicle emissions (including buses) is supported but we would oppose any restrictions on public transport to access the city centre based on their emissions.</p> <p>We support the council aspiration to introduce new vehicle technologies such as gas and electric vehicles. These have been recently introduced on some services in Leeds and Wakefield. As the technology develops we envisage that more services will use alternative fuels. The topography of Bradford may restrict the use of such vehicles in the short term but the policy is supported nonetheless.</p>	Noted.	No action taken.

Issue 18: Parking Provision				
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Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	As this section notes, car parking is spread throughout the City centre in a random manner much of which is poor quality and does not present a very favourable impression of the City. Consequently, we would strongly endorse the development of a Strategy to rationalise the amount of car parking provided across the City centre. A key part of the Strategy should be to improve the visitor experience of the City. Therefore it ought to should set out the expected quality which any car parking facilities should attain. Such an approach has been used in Sheffield City centre.	In regards to the comment raised on car parking, the Council is currently producing a car parking strategy for the city centre. Car parking requirements for allocated sets will be set out within supporting statements in the AAP and the Core Strategy.	See Car Parking Strategy and Revised Movement Chapter.
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	We agree that there is no overall strategy for parking in the City Centre. Further development of the options is necessary. The statement on new transport technologies should go further than this sample introductory sentence. Transport schemes need to be considered now as options for improving connectivity with some indication of the main funding and delivery sources.	The Transport Study has assessed the existing and current transport / connectivity issues facing the city centre and put forward solutions to overcome them. The results and recommendations of the study have been taken forward into the Publication Draft document.	See Revised Movement Chapter.
	Bob May Turley Associates on behalf of Westfield Shopping Towns Ltd	The city centre should have a coordinated car parking strategy that ensures that short stay visitors to the city centre are directed to available and convenient car parking spaces. Given the existing supply of existing car parking space in Forster Square Retail Park and competing out of town retail centres such as White Rose that offer extensive free parking, it is essential that Bradford manages the quality and quantity of its parking in a proactive way. Bradford city centre compares poorly to other major city centres in having no coordinated variable message and welcome signs aimed specifically at car borne visitors approaching the city centre.	In regards to the comment raised on car parking, the Council is currently producing a car parking strategy for the city centre. Car parking requirements for allocated sets will be set out within supporting statements in the AAP and the Core Strategy.	See Car Parking Strategy and Revised Movement Chapter.
	Michael Long Metro	Whilst we accept that some city centre car parking is required, the availability of car parking encourages car use. Metro encourage a restrictive approach to car parking with minimal long stay car parking in the city centre.	The Council acknowledges Metro's preference for restrictive approach to car parking.	No action taken.

Issue 19: Provision of a Safe and Inclusive Public Realm

Rep ID	Name / Organisation	Summary of Representation
		No Comments Received

Issue 20: Impact of new development upon the transport network

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Michael Long Metro	Metro support the City Centre Transport Study to determine the implications of the AAP proposals. All required infrastructure needs to be delivered in line with the related development. A number of transport schemes have recently been tested for the West Yorkshire Transport Fund using the Urban Dynamic Mode (UDM) developed by SDG consultants. Metro are in the process of taking the model in house so we would encourage that the council uses the UDM model with Metro to test different land use options and transport schemes.	The Council welcomes the Metro's support on the Transport study. The Council will continue to work closely with Metro on the production of the AAP.	No action taken.

Issue 21: The Nature of the Built Form

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	Bradford has a particularly distinctive City Centre and, unique amongst most of the Cities in the north, a building material which is used consistently across the City (certainly up to the 1950s anyway). We welcome the intention for the Area Action Plan to provide detailed	The Council acknowledges the need for design guidance to ensure new development does not adversely	See Revised Built Form Chapter and additional design guidance for proposed allocations.

Issue 21: The Nature of the Built Form				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>guidance for each of the proposed allocations. However, as we have pointed out in our comments above, the design guidance in the plan needs to make it clear where the development of a site is likely to impact upon a heritage asset and the considerations that need to be taken into account in order to ensure that these assets are not harmed.</p> <p>When considering speculative, unallocated, sites, proposals should also be assessed against not only the documents set out in this Section but should also have regard to the guidance contained in the respective Conservation Area Assessment.</p> <p>For sensitive or complex sites, the local planning authority should produce detailed Masterplans Design Briefs to guide their development.</p>	<p>impact upon the built heritage in the city centre.</p> <p>The Council recognises the potential need for Masterplans, Development Briefs etc, for the delivery of sensitive and complex sites.</p>	

Issue 22: Built Form and Use of Natural Resources		
Rep ID	Name / Organisation	Summary of Representation
		No Comments Received

Issue 23: Green Infrastructure and Open Space within the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Bev Lambert</p> <p>Environment Agency</p>	<p>The text currently lacks any definition of green infrastructure, or local context to help quantify the importance of green infrastructure and green space in Bradford. Whilst the city park in Centenary Square provides open space it does not constitute green infrastructure. The challenge for the AAP is to identify opportunities to create and enhance green spaces in a holistic manner so that they provide social and economic enhancements for the city without being ecologically sterile.</p>	<p>The Council acknowledges the importance of green infrastructure and this has been strengthened in the Publication Draft document.</p>	<p>See Green Infrastructure Study and Policy M6.</p>

Issue 24: Biodiversity in the City Centre				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Bev Lambert</p> <p>Environment Agency</p>	<p>The text makes no reference to the intrinsic value of biodiversity, nor the aim of enhancing it, as set out in objective 8. The next draft of the AAP needs a coherent and measurable strategy to enhance the biodiversity value of the AAP area.</p>	<p>The Council acknowledges the need to strengthen planning guidance on Biodiversity in the AAP and has strengthened this in the Publication Draft.</p>	<p>See Ecology Study and Policy M5.</p>

Issue 25: The Appearance of Streets				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required

Issue 25: The Appearance of Streets				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	We fully endorse the need for an attractive, high-quality, clutter free inclusive environment. We support the intention for the Area Action Plan to take forward the principles of the Streetscape Design Manual and the supporting Shopfront Design Guide SPD and would encourage the continuation of the current public realm improvements programme (Option (a)). We also support the extension of this programme to other part of the City Centre.	The Council welcomes English Heritage's support on this issue and specifically Option A.	No action taken.

Issue 26: The Use of Developer Contributions (CIL / S106 and S278)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	We would support the use of CIL contributions to assist in the delivery of public realm improvements across the city centre.	The Council acknowledges English Heritages support for the use of CIL to fund public realm improvements.	No action taken.
	Michael Long Metro	Metro support the use of both CIL and S106. Once the Transport Study is completed, Metro and the Council need to agree which schemes should fall under S106 and CIL respectively.	The Council will continue to work closely with Metro on the production of the AAP.	No action taken.

Issue 27: The use of 'alternative' forms of public financing for infrastructure provision				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Clive Brook Dacres / Johnson Brook Planning on behalf of Bradford Property Forum	This section presents a collection of possible mechanisms rather than an analysis of whether they will work in this context. For example, there is a popular argument that any CIL charging rate should be zero in the City Centre. The extent to which site specific Section 106 and Section 278 agreements will work in viability terms needs much more thorough analysis. The inclusion of this issue and the list of possibilities is welcomed. However work is required urgently to rationalise the options. The Forum will be pleased to provide further responses on delivery mechanisms and timescales for grouped sites on an area master plan framework basis.	The AAP will not decide whether or not CIL will be charged in the City Centre. The CIL will set out the charging schedule for all areas of the District. The section presents methods of how infrastructure can be funded. The Infrastructure Study for the City Centre contains detailed guidance on this. The Council welcomes the Property Forums support on providing further responses on delivery mechanisms.	No action taken.

Issue 28: 'Alternative' Delivery Mechanisms				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Ian Smith English Heritage	We would support the principal of using LDOs in specific parts of the City Centre, (Option (b)). As the document mentions, the Learning Quarter may well be an area where such an approach might be successfully adopted. It would also be worthwhile exploring the potential of utilising LDOs in other areas (such as Little Germany and the Markets) where they might help to increase investment in and encourage greater occupation/more effective use of currently-vacant floorspace. There are also other delivery mechanisms outside the AAP which might be used to deliver the Vision for the City Centre. These include the following:-	The Council acknowledges English Heritages support for Option B. The Council will consider the other suggested 'Alternative' delivery mechanisms in the Production of the Publication Draft document.	See revised Delivery Chapter.

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		<ul style="list-style-type: none"> • A City Centre Manager. • Portas suggested creation of Town Teams. • A Strategy for improving the quality of what is on offer <ul style="list-style-type: none"> ▪ including education of smaller retailers about ways of improving quality. • Measures for encouraging new start-up retailers into the City <ul style="list-style-type: none"> ▪ Centre • Encouraging temporary uses that attract people into the City • Centre and improve its vibrancy. 		
	Joanna Gabrilatsou Jones Lang LaSalle on behalf of Legal General	<p>V/1.10 Residential/Office/Retail/Hotel/ 0-3 years Private Funding Leisure/Education/Community/</p> <p>Clarification of the reference given to Sunwin House should be made. Within the Strategic Approach Chapter of the draft AAP, Sunwin House is reference V/1.11. Within the Delivery Chapter of the draft AAP, Sunwin House is reference V/1.10.</p>	The Council acknowledges the error in continuity between the two sections, which will be corrected in the Publication Draft document.	See Revised Allocation statement for Sunwin House.