Local Development Framework for Bradford

Core Strategy Issues and Options

Summary of Representations

Topic Paper 4: Economy and Jobs

December 2007











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यह दस्तावेज़ उन बहुत से दस्तावेज़ों में से एक है जिनसे मिलकर ब्रैडफोर्ड डिस्ट्रिक्ट का लोकल डिवेलप्मेंट फ्रेमवर्क बनता है। यदि आप इस दस्तावेज़ की जानकारी का हिन्दी अनुवाद या इसे ब्रेल, बड़े अक्षरों या टेप पर प्राप्त करना चाहते हैं , तो कृपया लोकल डिवेलप्मेंट फ्रेमवर्क ग्रुप से (01274) 434050, (01274) 434544 या (01274) 434606 पर सम्पर्क करें।

ਇਹ ਦਸਤਾਵੇਜ਼ ਅਜਿਹੇ ਬਹੁਤ ਸਾਰੇ ਦਸਤਾਵੇਜ਼ਾਂ ਵਿਚੋਂ ਇਕ ਹੈ ਜਿਨ੍ਹਾਂ ਨਾਲ ਬਰੈਡਫੋਰਡ ਡਿਸਟ੍ਰਿਕਟ ਦਾ ਲੋਕਲ ਡਿਵੈਲਪਮੈਂਟ ਫ਼ਰੇਮਵਰਕ ਬਣਦਾ ਹੈ। ਜੇਕਰ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਵਿਚ ਦਿੱਤੀ ਗਈ ਜਾਣਕਾਰੀ ਦਾ ਪੰਜਾਬੀ ਅਨੁਵਾਦ ਜਾਂ ਇਸਨੂੰ ਬ੍ਰੇਲ, ਵੱਡੇ ਅੱਖਰਾਂ ਜਾਂ ਟੇਪ 'ਤੇ ਪ੍ਰਾਪਤ ਕਰਨਾ ਚਾਹੁੰਦੇ ਹੋ ਤਾਂ, ਕ੍ਰਿਪਾ ਕਰਕੇ ਲੋਕਲ ਡਿਵੈਲਪਮੈਂਟ ਫ਼ਰੇਮਵਰਕ ਗਰੁੱਪ ਨਾਲ (01274) 434050, (01274) 434544 ਜਾਂ (01274) 434606 'ਤੇ ਸੰਪਰਕ ਕਰੋ।

ব্রাভফোর্ড ডিস্ট্রিক্ট (Bradford District) এর লোক্যাল ডেভেলাপমেন্ট ফ্রেইমওয়ার্ক (Local Development Framework – স্থানীয় উন্নয়ন কাঠামো) এর অনেকগুলো কাগজপত্র বা দলিলপত্রের একটি হলো এই তথ্যপত্রটি। এই তথ্যপত্রের বিষয়বস্তু কমিউনিটির লোকদের কোনো ভাষায় বুঝতে চাইলে অথবা লিখিত অনুবাদ চাইলে নতুবা তা ব্রেইলে (অন্ধলিপিতে), মোটা হরফে কিংবা ক্যাসেটে রেকর্ড করে চাইলে, অনুগ্রহ করে লোক্যাল ডেভেলাপমেন্ট ফ্রেইমওয়ার্ক গ্রুপ (Local Development Framework Group)-কে (01274) 434050, (01274) 434544 বা (01274) 434606 নাম্বারে ফোন করুন।

આ દસ્તાવેજ ઘણાંમાં નો એક છે કે જે બ્રેડફર્ડ ડિસ્ટ્રકટ નાં સ્થાનિક વિકાસ ની રૂપરેખા બનાવે છે. જો તમને આ દસ્તાવેજનાં લખાણનું પ્રાદેશિક ભાષઓમાં ભાષંતર કરાવવાની અથવા તેનો અર્થ સમજવાની જરૂર જણાય, અથવા તમને તેની જરૂર બ્રેઈલ, લાર્જ પ્રિન્ટ કે પછી ટેપ ઉપર હોય, તો મહેરબાની કરી લોકલ ડિવેલપમેન્ટ ફ્રેમવર્ક ગ્રુપનો (01274) 434050, (01274) 434544 અથવા (01274) 434606 પર સંપર્ક કરો.

بید ستاویز بریڈو روڈ ڈسٹر کٹ کے مقامی ترقیاتی لائخ ممل سے متعلقہ دستاویزات میں سے ایک ہے۔ اگر آپ کو اِس دستاویز کا زبانی یاتحریری ترجمہ کسی بھی کمیونٹی زبان میں درکار ہویا آپ اِسے بریل، لارج پرنٹ یاٹیپ میں چاہتے ہیں تو براہ مہر بانی لوکل ڈیویلپینٹ فریم ورک گروپ سے ٹیلی فون نمبر:01274 434544 434050, 01274 434544 یا 01274 434606 پر ابطہ کریں۔

LIST OF CONSULTEES WHO SUBMITTED COMMENTS ON TOPIC PAPER 4

- 1. Airedale Partnership
- 2. Arnold Laver (submitted by Drivers Jonas)
- 3. Ben Rhydding Action Group
- 4. Bolsterstone Plc (submitted by Drivers Jonas)
- 5. Bradford Centre Regeneration
- 6. Bradford Chamber
- 7. Costco Wholesale Ltd (submitted by RPS Planning)
- 8. Environment Agency
- 9. Government Office for Yorkshire and the Humber
- 10. Ilkley Civic Society

- 11. Ilkley Parish Council
- 12. Metro
- 13. Natural England
- 14. Royal Society for the Protection of Birds
- 15. Save Us Pub
- 16. Sport England
- 17. The Ramblers Association
- 18. Yorkshire and Humber Assembly
- 19. Yorkshire Water

COMMENTS	ORGANISATION
GENERAL	
The paper needs to be re-visited to take account of the recently launched Economic Strategy for the District. This Strategy inter alia notes the importance of the four economic hubs covered by masterplans within the District. These are referred to in the Topic Paper (paragraphs 2.9 to 2.11) but they should be explicitly acknowledged as the key locations for economic growth. Moreover the Bradford City Centre masterplan is given no coverage in terms of economic significance. In terms of employment alone, it is estimated (Regeneris 2006) that regeneration activity in the centre over the next 10 years could result in 12000 jobs, mainly in the centre but also elsewhere in the District.	Bradford Centre Regeneration
The Topic Paper could also make more mention of the important role of tourism and the arts.	
"Trading" land use should become a standard feature of the LDF (it is unclear whether or not this is the intent). To ensure maximum flexibility within the LDF and suitable outcomes for both planners and business, exchange of land use on specific sites, on a mutually beneficial basis, should become 'part of the norm'.	Bradford Chamber
Para 2.4 – Only DPDs in the LDF are part of the development plan. PPG3 and the addendum to which para 3.22 refers are superseded by PPS3 – see paras 26 and 38 (5 th indent).	Government Office for Yorkshire and Humber
The RSS policies which support directing development away from flood risk areas should be included.	Environment Agency
Whilst we recognise the need for economic regeneration and the demand for employment land, as above we would have serious reservations about the use of currently prescribed Green Belt or greenfield land for this purpose.	The Ramblers Association
3.26 refers to rural diversification with which we sympathise and understand the challenge. However we consider that any development must be sympathetic with the landscape and cultural heritage.	
We welcome the references to RSS and the summary that provides the context for this consultation paper. In relation to economic development, the 'key message' from draft RSS for Bradford is "There should be a significant sustainable supply of land for all employment uses given the strong growth forecast and to reflect the emphasis on Bradford in the sub area " (Draft RSS, Table 14). The Forecast Change in Total Employment Land in Use 2006 – 2016 is -15 to 44 ha (Draft RSS,	Yorkshire and Humber Assembly

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Table 14.6).	
Paragraphs 3.7 to 3.11 discuss the regionally forecasted demands for employment land in Bradford. Notwithstanding the view that there is potentially an oversupply of unsuitable sites, it will be worth emphasising that these forecasts look at net, not gross changes to the amount of land in productive use. Therefore, it needs to be recognised that a significant bank of employment land will be required to facilitate proper choice, movement and "churn" in the market.	
Paragraph 3.11 refers to more recent forecasting work that generates more optimistic econometric results. It should be emphasised that this work is based upon work carried out as part of the 2nd iteration of the Leeds City Development Programme (CRDP). It reflects, in common with the other CRDPs, a series of planned investments and interventions that all need to be delivered in order to realise the higher levels of growth. On this basis, the Core Strategy needs to identify which of these major projects it is able to support and make provision accordingly.	
Q 4.1 HOW CAN THE LDF CONTRIBUTE TO PROVIDING GREATER PROSPERITY TO THE DISTRICT?	
The framework needs to ensure that there is enough land/premises etc available to allow for the growth of new businesses in the area in line with the regeneration of Airedale, the impact of LEGI funding and the creation of new projects such as the Advanced Digital Institute in the district. There is also a need to provide sites which provide the opportunity for existing businesses to restructure and relocate from older premises which don't meet their current business needs. This may result in a loss of employment, as companies restructure. But this restructure will preserve the remaining employment and an increased contribution to the District's GVA as the company become more efficient and productive.	Airedale Partnership
The aim should be to provide sufficient land in the right locations and of better quality. This may require land assembly, remediation, servicing and improvement of older industrial/employment sites. With the shift to service employment and the focus on the knowledge economy, such sites need to be of a high quality environmentally, be well served by ICT infrastructure and be accessible by public transport. With the decline of manufacturing, the key issue is not about moving goods, it's about moving knowledge, either remotely through the ICT network or moving the people (the workforce) who have the knowledge to their place of work	
The best option is to provide better quality sites, in the right locations and for appropriate use , and bring to market at the earliest opportunity.	Bradford Chamber

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We do not necessarily think that more employment land needs to be designated, although we are unsure about the 'general perception' of an over-supply of employment land in the district.	
If a mapping exercise has not yet been done, identifying all unused sites and the prospect of their future availability, then perhaps that should be a priority.	
Some previously classified employment land has been allowed to change to housing classification. This allowed change will result in lesser opportunities for job creation as such land becomes scarcer. This shortage could also result in people having to travel further for jobs. This also then impacts on transport needs and infrastructure, which could mean that jobs cannot be created in some areas where there is no prospect of sections of highway becoming available to support the proposed jobs. We should also assess the impact id traffic calming is required in order that we create a safer environment in the area where any new roads are created. We should not sacrifice existing road networks in order that we create new ones. We should also assess any adverse impact on the well being and services of existing housing stock and the business community. Again we feel we should express caution before we commit to wholesale transport changes.	Bradford and District Chamber of Trade
It is considered essential that employment-generating opportunities are maximised within the area and as such a broad definition of suitable uses, including those that do not fall within a Use Class (sui generis), but which are considered appropriate on employment land should be included within the Bradford LDF. This will create the best opportunity for development of high quality and value businesses to come forward to help provide a wide range of quality, well paid jobs across a broad range of skills and types. This will provide a clear framework for the authority to consider proposals that come forward.	Costco Wholesale Ltd
Simply providing more land for employment use is unlikely to reflect national and regional policy or overcome unemployment and deprivation problems. Reference to tourism noted, its importance to Bradford's economy will need to be pursued.	Government Office for Yorkshire and Humber
Through a combination of <i>providing less land but in the right locations and by providing more quality sites</i> (Options 2 & 3). Also through promoting education opportunities and life long learning and raising attainment as a route out of poverty.	Ilkley Civic Society
Firstly by regaining a vibrant city centre	Ilkley Parish Council
If paragraph 3.10 is correct, then provide less land but in the right (i.e. accessible) locations.	Metro
The LDF needs to recognise the Environmental economy and the well being of the wider rural economy of the plan area, including the quality /enhanced natural and built environment and how this contributes to the	Natural England

attractiveness to inward investment, tourism income, leisure and recreation generation. The LDF also needs to recognise the continuing importance of the primary industry contribution- farming, forestry, minerals to the	
environment. Re- use of rural buildings should take into account specific rural needs and opportunities,	
impacts on landscape, wildlife and historic buildings, travel patterns including customer visits of any rural	
development. Rural areas should be encouraged and promote rural broadband/ICT and homeworking without	
adversely affecting neighbourhood amenities	
EMPLOYMENT LAND SUPPLY AND FORECASTS	
Q 4.2 HOW DOES THE LDF ENSURE THAT THERE IS THE RIGHT AMOUNT OF LAND ALLOCATED	
FOR EMPLOYMENT USE?	
Whilst land allocations based on statistical employment forecasts are a good starting point, a more	Airedale Partnership
sophisticated approach is necessary. The point that demand may result from companies wishing to	
relocate as part of an employment reducing restructure has already been made, in addition, the site	
requirements of the predicted growth sectors may vary. For example the Digital cluster is dominated by micro-	
businesses who, recent sector consultation has identified, have little desire grow above 4/5 employees.	
Growing the breadth of the sector and collaboration within the sector is the key to its success. This suggests	
that the sector's premises needs are for campus style development with flexibly sized units. The site and	
locational requirement for this type of development is likely to be very different from a large call centre for the	
financial services sector. I understand that more work is to be undertaken to develop the Experian forecasts	
as part of the City Region Development Plan and to examine premises/site needs of identified growth sectors.	
These should help inform the LDF.	D 16 101
By adopting a more market-led demand approach. The framework needs to have some element of flexibility	Bradford Chamber
in there to accommodate changes in industry, commerce and other economic development.	
Paging land allocation on statistical ampleyment forecasts is not appropriate on this accession. In an ever	
Basing land allocation on statistical employment forecasts is not appropriate on this occasion. In an ever- changing economy, especially one like ours at present, means that forecasts quickly become out-of-date.	
Looking at past take-up rates of land could also be meaningless, for the same reason.	
Looking at past take-up rates of land could also be meaningless, for the same reason.	
Perhaps a more pro-active approach is needed to ensure that land is available and allocated as needed. We	
recognise that use of Compulsory Purchase Orders is not universally popular but changing this 'last resort'	
policy to allow the buying up of more sites (whether by Bradford Council or another regeneration or special	
purpose vehicle) should be considered/adopted.	
Whichever options are pursued, they will need to be thoroughly justified in the light of the outcomes and	Government Office for

varied forecasts of studies undertaken, especially in relation to draft RSS and Leeds City Region. The spatial implications for Bradford reflecting its potential role in the development of the Leeds City Region will need more consideration.	Yorkshire and Humber
	Ilkley Civic Society
A <i>pragmatic development led approach</i> but ensuring that provision of employment sites needs to be	likiey Civic Society
geared to the specific sectors and locations where there is an employment problem.	Water Beriefe Correcti
By a more pragmatic development led approach	Ilkley Parish Council
I would recommend using the constrained growth forecast, but having a landbank to cater for the	Metro
unconstrained growth forecast and a strategy for re-allocating the land to other appropriate uses if the	
constrained growth forecast provides an oversupply of land.	
We recommend the completion of regular employment land needs surveys to feed into the LDF, taking into	Yorkshire Forward
consideration both past take ups of employment and statistical employment forecasts	
Key Question 4.2 sets out a number approaches to providing differing levels of employment land. While there	Yorkshire and Humber
are options to determine the amounts of land, these options do not ask meaningful questions about the mix of	Assembly
sites that should make up the employment land portfolio. Perhaps a more pertinent question would be to	-
examine how different types of sites and premises could deliver the economic strategy for Bradford.	
Paragraph 3.22 sets out some critical issues. The Assembly strongly supports these matters being pursued in	
the core strategy.	
THE LOCATION OF EMPLOYMENT ACTIVITIES	
Q 4.3 WHERE SHOULD THE LDF ALLOCATE LAND FOR EMPLOYMENT USES?	
The Partnership would support the focussing of development in growth areas such as Airedale. The	Airedale Partnership
Airedale Masterplan has identified the key locations for development within the area. These are on sites that	•
are well served by public transport and within or close to the town centres. These should be accessible to	
people from deprived communities who have less access to a car. Airedale is the location for a number of the	
growth sectors identified by the CRDP and the development of the Airedale Corridor has been specifically	
identified as an area of growth within the City Region. Work is already underway with Yorkshire Forward to re-	
enforce Airedale as a location for the electrical and optical equipment sector (electronics) through support for	
the Advanced Digital Institute and the identification of sites suitable for this sector.	
The Advanced Digital institute and the identification of sites suitable for this sector.	
With regard the financial and business services sector, this sector is well represented in Airedale through	
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companies such as Bradford and Bingley and Ecology Building Society. As you will be aware the CDRP	
included proposals to distribute future growth in this sector across the City Region to sites close to transport hubs including those in Airedale	

The point is to not adopt too prescriptive an approach on land allocation. It may be suitable at some point to reinforce existing employment areas, but also/simultaneously to support regeneration by allocating land in deprived areas. Wherever possible, companies themselves should be able to decide where to locate/expand, and not feel restricted by the identification of sites in places they might feel are inappropriate. It is generally accepted, however, that it would not be appropriate to locate an 'industrial' business in or near to the city or town centres. A flexible but practical approach should be applied throughout the district to land allocation. A holistic approach is also advantageous to assist business in a cost-effective and non-arbitrary manner. That is, allocating land for employment use that is evidenced or suspected to be unsuitable for companies (say, due to poor transport links) becomes wasteful (see also 4 below). Smaller towns and villages could retain facilities for mixed use. Conversely, though, there need be no principled opposition or obstacle to office-building occurring outside the centres, if that is the preferred option of some in business. Towns and villages should also be allocated land for employment use, and not merely be thought of as dormitories for larger centres. With ever-increasing traffic congestion, retaining local employment helps address commuting issues.	Bradford Chamber
Employment allocations must be informed by the Sequential Test and a Strategic Flood Risk Assessment.	Environment Agency
Paras 3.20-3.26 – The locational approach in draft RSS is an important consideration, in particular accessibility to a range of individuals especially by public transport. Some re-allocation of poorly located employment land in the rUDP may well be desirable. Employment locations should be sustainable. There may be scope for some limited additional floorspace to help sustain smaller settlements, including those in rural areas. As the strategy is developed it should indicate as far as possible the amount or proportions of land for employment in different parts of the district (and jobs to be created, if possible)	Government Office for Yorkshire and Humber
Employment should be focused in town and city centres, and in growth areas such as Airedale.	Ilkley Civic Society
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as well as reinforcing existing areas of employment use within new allocations.	
In city and town centres, i.e. the most accessible locations.	Metro
Development should avoid locations where they would be likely to affect international, national or locally designated wildlife sites, and areas of high biodiversity outside these areas. Furthermore, developments should be directed away locations with a high risk or flooding or where they would increase flood risk elsewhere. New development should also be sited where there is sufficient transport capacity, particularly public transport, to support the proposed level of growth. In all locations, opportunities should be identified and taken to incorporate beneficial biodiversity features (as per paragraph 16 of PPS9) e.g. the Bradford canal reinstatement should strengthen the wildlife corridor running into the city and incorporates high-quality green space.	RSPB
The release of employment sites should be strategically controlled to ensure development is targeted at areas such as <i>Bradford city centre and the main urban, and those areas identified as regeneration priorities</i> . This approach will also ensure that sustainable and accessible locations are brought forward in advance of sites that could result in the loss of Greenfield land or locations with limited accessibility by a range of transport modes.	Yorkshire Forward
To ensure efficient and appropriate land allocations are made, we recommend the completion of regular employment land needs surveys to feed into the LDF, taking into consideration both past take up rates and statistical employment forecasts.	
In order to complement the urban renaissance objectives within Bradford District, we believe that the anticipated rise within office developments should, where possible, be catered for within city and town centres in order to encourage sustainable travel patterns and re-invigorate the retail centres. Sufficient employment land must be provided to cater for both industrial and warehousing businesses to allow for the expansion and relocation of businesses. Sites should ideally be situated in locations which are attractive in the business community, sustainable in terms of access to services, and located in close proximity to good transport links.	
The Assembly supports the focussing of the majority of economic development in the city and towns	Yorkshire and Humber
centres especially in relation to office and other high-trip generating uses.	Assembly
PROTECTING EXISTING EMPLOYMENT LAND AND BUILDINGS	
Q 4.4 WHERE AND HOW MUCH OF THE EXISTING EMPLOYMENT LAND AND BUILDING SHOULD THE	

LDF BE PROTECTING?	
It is difficult to respond to this question without more work on demand and supply. Well located sites should be protected; however, some sites may need to be developed for a mix of uses to generate sufficient value to support the infrastructure and other costs necessary to make development financially viable. This applies equally in deprived and rural areas.	Airedale Partnership
The emerging RSS considers that opportunities to redevelop older industrial areas for housing should be exploited. Furthermore, an addendum to PPG3 published in 2005 states that additional housing schemes should be supported in industrial areas no longer suitable for continuing employment use. It is recommended that the Core Strategy promote these objectives within Bradford.	Arnold Laver
Arnold Laver would also welcome the designation of sites, which are in sustainable locations , currently allocated for employment uses or those previously used for employment for a mixed use development including employment, retail and residential uses.	
The Core Strategy should seek to review existing employment sites to establish whether the land is still required and whether continued use of the land for employment would be appropriate. This would ensure that land and buildings which are no longer required are protected unnecessarily and enable them to the redeveloped for more appropriate uses. Arnold Laver are therefore in support of <i>protecting sites in certain locationally suitable areas</i> .	
There may be a need to protect certain locationally suitable areas and a need to 'protect' certain existing stock for employment use.	Bradford Chamber
Conversely, though, we feel that some buildings in the district have been unnecessarily protected and possibly hindered change and economic development happening at a quicker pace – some mills, warehouses, church halls, and other listed buildings, for example.	
Protecting land or buildings in deprived areas to ensure employment opportunities should not be done without overwhelming evidence that the sites are suitable to business/employers.	
It is considered that to make the most of Bradford's potential for economic growth and to create opportunities for increased employment each existing employment zone should be assessed in terms of its suitability for individually proposed modern employment uses.	Costco Wholesale Ltd

Moreover, the acceptability of the proposals should be based on their individual merits. It is considered that a	
definition of uses appropriate for employment land should be included in order to provide the authority with a	
clear framework for considering proposals that come forward for each employment area.	
The opportunity to reduce flood risk on existing employment land/buildings should be considered.	Environment Agency
Sites should be protected if they are located in suitable areas. Sites in existing Employment	Ilkley Civic Society
Zones should also be protected (Options 1 & 2)	
Sites should be protected if they are located in suitable areas. Sites in existing Employment	Ilkley Parish Council
Zones should also be protected (Options 1 & 2)	
Protect sites in locationally suitable areas (i.e. accessible by sustainable transport modes).	Metro
The release of employment sites should be strategically controlled to ensure development is targeted at areas	Yorkshire Forward
such as Bradford city centre and the main urban area and those areas identified as regeneration	
priorities. This approach will also ensure that sustainable and accessible locations are brought forward in	
advance of sites that could result in the loss of Greenfield land or locations with limited accessibility by a	
range of transport modes. Office development should be catered for within city and town centres so they	
are sustainable in terms of access to services.	
The Assembly supports the protection of employment land (Paragraph 3.23). However, this should only	Yorkshire and Humber
be in cases where the loss of such land would undermine the achievement of the sustainable renaissance of	Assembly
the main urban areas.	
DEFINITION OF EMPLOYMENT USES	
Q 4.5 HOW SHOULD THE LDF DEFINE EMPLOYMENT USES?	
Whilst sympathetic to the idea to extending the employment uses to the activities such as those outlines in	Airedale Partnership
Para 3.24, I would not support a wider definition as the other major employment uses are retail and leisure.	•

The current Bradford UDP has a narrow view of employment uses. Its definition of employment as primarily B1, B2 and B8 uses does not allow for the changes in employment patterns. The Local Development Framework therefore needs to be more flexible in its definition of employment uses.	
The <i>widening of the definition of employment uses</i> would enable designated employment areas to become of a more mixed-use nature. This would encourage these areas to be used by a wider range of people and at different times throughout the day, and thus making them more sustainable.	
Arnold Laver is therefore in full support of the Option for the definition of employment uses being extended to include other employment generating activities. It is recommended that the definition of employment uses should now include the following:	
Core Employment uses of B1 (business), B2 (general industrial) and B8 (storage and distribution);	
Other employment activities such as car sales, vehicle repair and maintenance, and tourism related developments;	
Other uses including A1 (retail), A2 (financial and professional), A3 (restaurants and cafes), A4 (drinking establishments), A5 (hot food takeaways), C1 (hotels), C2 (residential institutions), D1 (non-residential institutions) and D2 (assembly and leisure) as appropriate on a site by site basis.	
We believe the <i>definition of employment should be widened</i> (and simplified) to include all enterprises which provide jobs, particularly local jobs. For instance many local shops and Pubs in small settlements may only provide a few dozen jobs but by their nature they will provide local and really sustainable employment opportunities. We would also like the Council to take the opportunity at the appropriate time to call upon the Government to amend the use class order in order to make pubs a specific use class in their own right.	Ben Rhydding Action Group

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Arnold Laver is therefore in full support of the Option for the definition of employment uses being extended to include other employment generating activities. It is recommended that the definition of employment uses should now include the following:	
Core Employment uses of B1 (business), B2 (general industrial) and B8 (storage and distribution);	
Other employment activities such as car sales, vehicle repair and maintenance, and tourism related developments;	
Other uses including A1 (retail), A2 (financial and professional), A3 (restaurants and cafes), A4 (drinking establishments), A5 (hot food takeaways), C1 (hotels), C2 (residential institutions), D1 (non-residential institutions) and D2 (assembly and leisure) as appropriate on a site by site basis.	
There is a need to clearly define uses of land for employment at an early stage. A more comprehensive and understandable definition would help with mapping, tracking and forecasting.	Bradford Chamber
Narrow definitions that exclude certain sectors will, as the Core Strategy consultation says, cause confusion and perhaps even disadvantage future economic development in Bradford. That is, if uses do not include categories that fall into developments featuring hotels, leisure and tourism, planning and regeneration could be affected.	
We therefore ask for an <i>inclusive and wide-ranging definition of employment uses</i> that can be considered in relation to the LDF. Retail should, of course, be included.	
'Business and Industry' is perhaps not a suitable description for the employment section of the plan, as it would not adequately cover all categories.	
As identified above, it is considered that the <i>LDF definition of employment uses should be widened to</i>	Costco Wholesale Ltd

	<u></u>
include sui generis uses including warehouse clubs. The Replacement Unitary Development Plan for Bradford District acknowledges that viable employment opportunities do not necessarily fall within the B use classes thus, a broad definition of suitable uses on employment land should be included in the LDF. It is considered that the following definition of employment would be appropriate: "All buildings which are used or designated for purposes within the Use Class B1, B2 and B8 and closely related uses not falling within a use class, sui generis, (such as warehouse clubs, cash and carry businesses and builders merchants) but which are commonly found in industrial estates."	
This broad definition of employment use would present the best opportunity for development to come forward within Bradford and to help to provide a wide range of quality, well paid jobs across a broad range of skills and types.	
The range of uses should be widened, but excluding major retail. This needs to be centred at places such as Bradford city centre.	Ilkley Civic Society
The employment section should be called Business and Industry.	Ilkley Parish Council
We believe it should be widened (and simplified) to include all enterprises which provide jobs, particularly local jobs. For instance, many local shops and pubs in small settlements may only provide a few dozen jobs but by their nature they provide local and sustainable employment opportunities	Save Us Pub
Sport England would support a <i>wider definition of employment</i> to cover jobs in sport, leisure and recreation. This would recognise the true value such activities provide to the local economy, and the wider benefits associated with sport.	Sport England
Any information that can be highlighted as early as possible within the production of the plan would be useful for Yorkshire Water as it helps us plan our forecasts for the future, i.e. 20ha of B8 warehouse units will use far less water than 20ha of food producing units. However we need to base these forecasts on realistic expectations and employment types should not be defined too specifically if there is not a good chance they will be developed as described.	Yorkshire Water
Q 4.6 HOW CAN THE CORE STRATEGY SUPPORT THE RURAL ECONOMY IN PARTICULAR	
AGRICULTURAL DIVERSIFICATION?	
There needs to be sufficient flexibility in the LDF approach to land use to allow for diversification in the rural	Airedale Partnership
economy. To protect the landscape of the District the size of any development and its impact on the	
environment could be consideration in determining uses	
The best way to support rural diversification, especially where such activities take place on green belt land	Ben Rhydding Action Group

and on the highest quality agricultural land, that complete certainty should be assured by a declaration that	
such land will never be subject to other development pressures	
Allow for sensitive redevelopment and diversification	Ilkley Civic Society
Allow sensitive redevelopment of buildings	Ilkley Parish Council
By promoting mountain biking/developing technical mountain biking trails in locations accessible by rail!!	Metro
Encourage and promote Environmental businesses, in particular forestry, farm diversification and rural tourism linked to re-use of farm buildings for economic use	Natural England
Rural businesses can diversify through 'green tourism' projects, providing opportunities for people to	RSPB
sensitively explore the exciting wildlife and landscapes within the District. Funding for environmental	KOI B
improvements (including visitor infrastructure) can be sought from the new Environmental Stewardship	
schemes, thereby supplementing farm income. The Core Strategy should therefore include policy that	
facilitates green tourism initiatives, and associated projects that restore or create lost habitats and encourage	
a greater understanding of biodiversity. Such projects also contribute to local employment and, by	
encouraging visitors to an area, stimulate other local businesses.	
We feel the core strategy should make a commitment towards providing incubator units and live work units	Yorkshire Forward
within rural areas in order to encourage the development of small and medium enterprise. The core strategy	Tornormo Formara
could also place a greater focus on supporting sustainable approaches to farming, tourism and land	
management to assist the economy in order to secure long term future for the district's rural areas. The RES	
acknowledges that 'reform of the common agricultural policy is having profound impacts on agriculture' and	
identifies a number of opportunities available to farmers which could be incorporated into the core strategy	
options including 'focusing on food quality, biomass and biofuels and environmental stewardship' (para 3.130)	
YW owns 70,000 acres of land, of which 50,000 is non-operational. This is used for a variety of farming and	Yorkshire Water
leisure uses e.g. shooting, fishing and sailing. Whilst the land is not in operational use, careful management	
is required in order to contribute towards the protection of the natural environment, particularly the quality and	
quantity of ground and surface water resources essential for the supply of clean water. Farm tenants, in	
particular, act as caretakers of the land and in this respect it is important for YW that farm units remain	
financially viable.	
YW would support a development plan policy which provides for the extension or erection of new agricultural	
buildings where there is a proven need for the development.	
YW would also support a development plan policy which provides for the diversification of the rural economy and the re-use and redevelopment of rural buildings.	

PPS7 requires that suitable commercial uses should be sought for redundant rural sites prior to the consideration of residential development. The use of buildings as residential units to let should be considered as a commercial use. Such units can provide a vital income stream to a farm. Restrictions on the use of the building for residential lettings as opposed to sale could be secured through the use of a planning agreement or condition.

Flexibility should also be given to the use of farm land and buildings for regular events, such as car boot sales, which can also be an important source of income for the farmer. It should be accepted that such events do have a temporary impact on the quiet enjoyment of rural areas but they have a role to play in supporting its economy.

Produced by the City of Bradford Metropolitan District Council

Local Development Framework Group

December 2007

