



# Yorkshire Water

*Representations to the Bradford Core  
Strategy (Publication Version)*

March 2014

It's part of our  
Blueprint for Yorkshire

# Contents

<b>1.0 Introduction</b>	<b>4</b>
<b>2.0 Representation on Section 3- Spatial Vision, Objectives and Core Policies</b>	<b>5</b>
<b>3.0 Representation on Section 4- Sub-Area Policies</b>	<b>7</b>
<b>4.0 Representation on Section 5.1- Thematic Policies (Economy and Jobs)</b>	<b>8</b>
<b>5.0 Representation on Section 5.3- Thematic Policies (Housing)</b>	<b>9</b>
<b>6.0 Representation on Section 5.4- Thematic Policies (Environment)</b>	<b>10</b>
<b>7.0 Representation on Section 6- Implementation and Delivery</b>	<b>11</b>

## 1.0 INTRODUCTION

- 1.1 Yorkshire Water (YW) is the statutory undertaker for water and waste water throughout Bradford District. Water supply is provided largely via a grid system with Chellow Heights treatment works playing a key strategic role in the provision of drinking water. The population is served by eighteen waste water treatment works (WWTW) of which fourteen are located in Bradford District. Yorkshire Water also owns and manages a significant area of upland to the north and west of the district providing both protection to water quality within reservoirs and a valuable contribution as a recreation resource and to biodiversity and ecosystem services.
- 1.2 Aside from catchment protection land, YW also has substantial operational land holdings, most notably at Esholt WWTW which whilst remaining functional as an operational site, also has a considerable amount of land available for redevelopment. This area has long been recognised by Bradford Council as providing an opportunity for a major new employment site and one that would not conflict with Esholt's function as one of the U.K.s largest WWTW. Other sites in the District within our ownership may come forward during the plan period as a result of changes in technology or legislative drivers.
- 1.3 YW's representations therefore reflect the fact that we are a major stakeholder in the area and key to the successful implementation of the Local plan. We welcome the general approach taken by Bradford in the plan and the recognition that Plan-making "involves planning ahead to ensure that services, utilities and infrastructure area available where they are needed....." (para 1.1).

## 2.0 Section 3 Spatial Vision, Objectives and Core Policies

### 2.1 Strategic Objectives

Yorkshire Water supports the principles of the strategic objectives described in para. 3.15, especially numbers 2, 3, 13, 15 and, and believes that they are consistent with national planning policy. Of particular relevance are parts:-

- 3 "Ensure that the appropriate critical infrastructure.....is delivered to support growth and the timing of development and infrastructure are aligned". It is essential that policies within the local plan reflect this objective in order to allow YW to provide for growth without impacting on water quality or increasing flood risk.
- 13 "To reduce the impact of climate change through mitigation and adaptation, particularly through reducing pollution, energy consumption, the risk of flooding and promoting the use of renewable energy and securing the means to become locally self-sufficient". YW is continually seeking to reduce its energy consumption, in part through greater use of on-site renewable technologies and its vital that Local Plan policies support all businesses in this aspiration
- 15 "Safeguard and enhance the District's biodiversity assets through careful landscape, woodland and waterways management. In particular the South Pennine Moors and upland fringe". YW is a major land owner in the South Pennines and believes that effective management for biodiversity will also protect and enhance water quality and assist in flood mitigation.
- 16 "Safeguard and enhance the District's natural and renewable energy resources, including water, agriculture, woodland and minerals, and promote the sustainable management of waste and recycling". It essential that the District's water resources are protected from inappropriate uses of land, such as landfill, within their proximity.

2.1.1 Policy P1, reflecting the NPPF's presumption in favour of sustainable development, seeks to ensure that "proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the Bradford District and wider Leeds City Region. Given that water and waste water infrastructure does not necessarily follow local authority boundaries, we especially welcome the emphasis on working with the wider Leeds City Region. The policy will also ensure that planning applications for new water/waste water infrastructure will be determined swiftly and so contribute to ensuring infrastructure is in place to serve new development.

2.1.1 We are satisfied Policy P1 accords with Planning Practice Guidance (PPG) in the emphasis on working proactively with applicants to find solutions. PPG encourages early discussions between local planning authorities and water and sewerage companies (WASCs) to ensure proposed growth and environmental objectives are reflected in company business plans.

### 2.2 Strategic Core Policies

2.2.1. Strategic Core Policy SC1- Yorkshire Water is supportive of the aims described within the policy and in particular parts:-

- 7 The role that YW plays in effectively managing the South Pennine Moors is noted above.

- 9 "Avoid increasing flood risk and manage land and river catchments for flood mitigation, renewable energy generation, biodiversity enhancement and increased tree cover" aligns with both YW's business objectives and PPG in encouraging a catchment-based approach. Adopting this approach will also assist in delivery of the Water Framework Directive (WFD). We would however like to see recreation added to the list of management objectives.

2.2.2. Strategic Core Policy 2 (SC2)- YW is generally supportive of the aims of the policy and welcomes the aspiration for Bradford to work with "partner organisations and local communities to appraise, reduce and manage all sources of flooding". We would be a key partner and believe that YW and the Environment Agency should be listed as taking a lead role for delivery of this policy. We are very pleased by the requirement for new development to use resources sustainably, particularly with regard to minimising water consumption and maximising sustainable drainage systems. YW also believes Local Plan policies should support it's, and other businesses, aspirations to produce and access renewable energy.

2.2.3 Strategic Core Policy 3 (SC3)- YW supports the aspiration for effective partnership working particularly with regard to Part A 6 and 7 of the policy. We concur that "planning decisions as well as plans, strategies, investment decisions and programmes should also be based on the effective discharge of the duty to co-operate to allow co-ordination of investment in infrastructure". As already noted, water and waste water infrastructure does not necessarily follow local authority boundaries. For example parts, of north-west Leeds drain to Esholt WWTW located within Bradford district. To ensure all new development is effectively served, LPAs should ensure that their housing policies in particular, are aligned in a timely manner. Similarly it is essential that all forms of flooding are managed on a basis of cooperation and partnership across boundaries. We believe the policy conforms with the Duty to Co-operate and PPG (Para 008).

2.2.4 Strategic Core Policy 5 (SC5)- YW fully supports the proposal for "re-use of deliverable and developable previously developed land and buildings" as the first priority. We suggest that the wording of part A3 of the policy stating "third priority to Local Green Belt releases to the built up area of settlements in sustainable locations" could prevent release of the developable land at Esholt WWTW which is within Green Belt but not adjacent to an existing built up area. If the policy remains as written in this respect, it appears to conflict with other policies within the Plan (see BD1 part C2 and EC3 part C).

2.2.5 Strategic Core Policy 6 (SC6)- YW agrees that "making space for water" can among other benefits, manage flood risk, improve water quality and enhance biodiversity. We support therefore support all parts of SC6 that will enhance and encourage green infrastructure.

2.2.6 Strategic Core Policy 7 (SC7)- YW generally supports release of Green Belt land to ensure that the District's housing and employment needs can be met. We are however concerned that the Policy appears to promote a piecemeal approach to release at Allocations DPD stage and as already noted, SC5 suggests that releases would be limited to areas close to the built up area of settlements in sustainable locations. We would prefer a Full Green Belt Review to be undertaken to ensure that land at Esholt WWTW is considered at an early stage. The entire site is within Green Belt with only the original works infrastructure designated as a Major Developed Site (MDS). The works has been upgraded in recent years to ensure compliance with the Freshwater Fisheries Directive and a significant part of the site outside the MDS now has WWTW plant located on it. Yorkshire Water believes that a Green Belt review should be undertaken at an early stage

and include the whole of the Esholt site. We do not believe that such an approach would "undermine the strategic function of Green Belt within the Leeds City Region".

The approach would not only assist YW in ensuring effective delivery of essential infrastructure but would also contribute to meeting the housing and employment needs of the District.

Outside of the Esholt area, a Green Belt Review should also consider the requirements of new development in terms of water and waste water infrastructure. Releases of Green Belt should include for locating any necessary infrastructure within the released land and should be considered on a strategic basis within the Leeds City Region in line with Policy SC7. It should also be noted that, as at Esholt WWTW, infrastructure upgrades to water and waste water treatment works etc. can result in land becoming available for redevelopment which may, along with the works, be within Green Belt.

### 3.0 Section 4 Sub Area Policies

#### 3.1 Sub Area Policies- Regional City of Bradford including Shipley and Lower Baildon

3.1.1 Sub Area Policy BD1- Yorkshire Water notes the proposed distribution of housing within the District. It is clearly essential that the allocation of new development is aligned with provision of infrastructure particularly in north-west Bradford where significant new/upgraded waste water infrastructure will be required in some locations.

YW supports the content of part C2 of the policy, including the proposed changes to Green Belt which will facilitate the delivery of the "high quality research and development led technology park" at Apperley Bridge. The site is close to Esholt WWTW, which will remain operational throughout the lifetime of the plan, but employment uses are generally compatible with the operation of a modern WWTW and YW would work with developers to ensure an effective "buffer zone" is put in place.

3.1.2- Sub Area Policy BD2- YW supports the intention to provide infrastructure, including flood risk management measures, to support regeneration initiatives on the Shipley and Canal Road, corridor (note this principle also applies to all sub-areas).

## 4.0 Section 5.1 Thematic Policies- Planning for Prosperity (Economy and Jobs)

### 4.1 Policy EC3 Employment Land Requirement

5.1.1 Yorkshire Water Supports part C of the policy which proposes examination of the need for Green Belt deletions “to provide high quality employment locations” including sites within north Bradford “tied to the locational benefits of proximity to Leeds Bradford International Airport and Apperley Bridge Rail Station”. We assume that this includes Esholt WWTW and as noted previously, suggest that the entire site is subject to review in order to ensure delivery of employment land and provision of effective waste water infrastructure to the wider District. Similarly, we support a review in the other parts of Bradford mentioned in the policy.



## 5.0 Section 5.3 Thematic Policies- Planning for People (Housing)

### 5.1 Figure HO1

5.1.1 Principle 2- YW supports "Prioritising, wherever possible, the use and recycling of previously developed land and buildings.....". Brownfield sites will usually have existing connections to water and waste water infrastructure and so reduce the impact of new development. Additionally there is often the opportunity for "betterment" with regards to surface water management whereby existing discharges to public sewer can be reduced by utilising more sustainable forms of drainage for new development.

5.1.2 Principle 4- YW strongly supports the "Phasing of land to ensure that housing growth is co-ordinated with planned infrastructure provision and to encourage the take-up of brownfield land in the most sustainable locations while ensuring delivery of housing targets in line with a published housing trajectory". The approach is in line with PPG which states that plan-making may need to consider "phasing new development so that water and waste water infrastructure will be in place when needed".

### 5.2 Policy HO4 Phasing the release of housing sites

5.2.1 YW strongly supports Policy HO4, particularly with regard to Part C 4 and 6

5.2.2 As noted above, YW concurs with the principle of the phasing of new housing, placing "a focus on the early release of deliverable and sustainable sites which are not dependent on significant new infrastructure and will place a focus ensuring that the timing of both housing and infrastructure are aligned" (para. 5.3.68).

5.2.3 Para 5.3.69 of the plan notes that the use of phasing policies will lead to some sites being held back until the second half of the Plan period. We agree with this principle but it should be noted that phasing may be required not just with respect to the overall housing delivery strategy but also to large individual sites, particularly in the north and northwest of the district where waste water infrastructure is at capacity in places. The approach will contribute significantly to flood risk mitigation and protection of water quality.

5.2.4 Para. 5.3.72. It is essential that the Local Infrastructure Plan is a key input into a phasing plan. As noted above there may be clear benefits in encouraging brownfield sites to come forward early as there is less likely to be a requirement for new infrastructure.

### 5.3 Policy HO7 Housing Site Allocation Principles

5.3.1 YW supports the policy particularly with regard to Parts C and D which promote maximising the use of previously developed land and prioritising sites which would remedy deficiencies in local infrastructure.

## 6.0 Section 5.4 Thematic Policies- Planning for Places (Environment)

### 6.1 Policy EN2-Biodiversity and Geodiversity

6.1.2 Yorkshire Water is major land owner within Bradford District and its upland land holdings in particular provide a valuable contribution to the District's biodiversity. We work with a number of partners to ensure this resource is effectively managed for water supply/quality and recreation as well as wild life. YW supports Policy EN2 in principle but it should be noted that we have a number of reservoirs and associated infrastructure within North and South Pennine Moors where works are sometimes required in the public interest (for example, reservoir safety legislative compliance). Given the scale of our interest, we suggest that we should be listed as having a "Lead Role" in delivering the policy.

### 6.2 Policy EN6- Energy

6.2.2 YW supports Policy EN6 and believes that it will comply with the NPPF in helping to deliver new low carbon and renewable energy technologies. The potential location of renewable energy facilities should be considered within the Green Belt Review.

### 6.3 Policy EN7- Flood Risk

6.3.1 YW as statutory sewerage undertaker supports policy EN7 and is pleased to note that it addresses all forms of flooding, with Part A6 providing an expectation that any need for improvements in drainage infrastructure is taken into account in assessing proposals for development.

6.3.2 YW will support Bradford Council in its intention to minimise run-off from new development (Part A8) and in the requirement on developers to examine SuDS as the preferred option for disposal of surface water

6.3.3 YW should be listed as having a "Lead Role" in delivering this policy.

### 6.4 Policy EN8- Environmental Protection

6.4.1 Yorkshire Water strongly supports the policy but suggests the first sentence is altered to read "In order to protect public health, **amenity** and the environment..." to reflect the first paragraph and Part C of the policy.

6.4.2 YW has a number of impounding reservoirs within the District that provide the public water supply. It is essential that no inappropriate uses of land are located where there could be connectivity from a pollutant source to the reservoir via a groundwater pathway. We agree with the suggested partnership approach and are pleased to note that YW is listed as taking a "Lead Role" in delivery of the policy.

## 7.0 Section 7 Implementation and delivery

### 7.1 Infrastructure delivery

Yorkshire Water as statutory water and sewerage undertaker is pleased that the Plan recognises that "new development, redevelopment and the intensification of existing activities can all generate additional demand for infrastructure including.....and utilities infrastructure". The Plan is correct in its assertion that it is vital that there is sufficient infrastructure to support the Core Strategy's policies.

7.1.2 YW strongly all elements of supports Policy ID 4 and welcomes the statement in para 6.35 that "the Council will work together with water supply and sewerage companies to ensure that water and waste water requirements are put in place alongside planned growth to avoid adverse environmental impacts and to improve water quality". We will commit to working with Bradford and other partners as appropriate in the preparation of an Infrastructure Delivery Schedule.

