

Bradford City Council – Core Strategy DPD Publication Draft

Representations made on behalf of **Caddick Developments Ltd**



Introduction

Please find set out below representations prepared by WYG Planning & Environment on behalf of Caddick Developments Ltd to Bradford City Council's Core Strategy Development Plan Document Publication Draft.

Caddick Developments Ltd own Conditioning House, a Grade II Listed mill located on Cape Street on the edge of Bradford city centre. The site is well located to deliver a number of land-uses and contribute positively to the continued regeneration of Bradford city.

Representation

In order to support the re-use of Conditioning House in line with the Council's strategic objectives, Caddick Development Ltd makes the following comments:

- Policy P1 – Presumption in Favour of Sustainable Development. We **support** this policy as it reflects the National Planning Policy Framework;
- Policy SC1 – Overall Approach and Key Spatial Priorities. We **support** this policy;
- Policy SC3 – Working Together. We **support** this policy.
- Policy SC4 – Hierarchy of Settlements. We **support** this policy and that Bradford remains the focus for development;
- Policy BD1 – The Regional City of Bradford including Shipley and Lower Baildon. We **support** this policy and that the number of new homes being delivered across the District are in line with the hierarchy of settlements;
- Policy BD2 – Investment Priorities for Regional City of Bradford including Shipley and Lower Baildon. We **support** this policy;
- Policy E3 – Employment Land Requirement. Under criteria (B) an item (6) should be added so as to include "Previously Developed Land and Buildings" as a source of floorspace to meet employment land requirements over the Plan Period. On that basis, we require that Policy E3 is **amended**;
- Policy E4 – Sustainable Economic Growth. We **support** that criteria (I) of this policy allows developers to demonstrate where meeting BREEAM ratings is not feasible or viable;
- Policy E5 – City, Town, District and Local Centres. We **support** criteria (A) of this policy as it supports Bradford as the focus for delivering a wide diversity of economic activity, including offices, residential, retail, markets, leisure, entertainment, arts, tourism and sports;
- Figure HO1 – 10 Principles for Achieving Sustainable Growth. One of the principles in this figure is the re-use of previously developed land and buildings. We **support** this policy;
- Policy HO2 – Strategic Sources of Housing supply. We **support** the aims and objectives of HO2;
- Policy HO6 – Maximising the Use of Previously Developed Land. This policy does not explicitly confirm that it includes previously developed buildings and we consider that it should do. This is especially relevant given that Bradford has a significant number of existing buildings, many of which are in very sustainable locations, which could be redeveloped for housing and make a valuable contribution to the housing supply across the Plan Period. The title of the policy should therefore be **amended** to read "Maximising the Use of Previously Developed Land **and Buildings**";
- Policy HO7 – Housing Site Allocation Principles. We **support** this policy on the basis that it includes prioritising allocations which would assist in regeneration and it reiterates that the use of previously developed land/ buildings should be maximised; this further supports our requirement for Policy HO6 to be amended to include explicit reference to previously developed buildings as well as land;



- HO11 – Affordable Housing. We **support** the inclusion of allowing developers to demonstrate viability regarding the delivery of affordable housing. We also support that the policy includes that provision is “up to” the relevant percentage thresholds. We would however suggest that a clearer map is provided at figure HO2;
- EN3 – Historic Environment. Part (D) of this refers to the preference for reusing Listed Buildings for its original use. Where this is not possible, the policy requires that it must be demonstrated that the alternative use is compatible with and will enhance the building and its setting and that no other reasonable use exists to safeguard the Listed Building. We request this part of the policy is **amended** so as to allow uses that would support the aims and objectives of the Core Strategy i.e. to support housing growth and the reuse of previously developed buildings. We suggest that the policy is amended to include Part (D)(3) to read “*the proposals reflect the strategic aims and objectives of the development plan*”;
- ID2 – Viability. In 2012 we submitted a representation to the Core Strategy and stated that there did not appear to be a sufficient mechanism for developers to demonstrate scheme viability. ID2 is a new policy in this Publication Draft. We therefore **support** the inclusion of Policy ID2 as it will allow developers who are progressing schemes on sites with abnormal costs, such as redeveloping listed buildings, are able to demonstrate viability throughout negotiations with the Council;
- ID3 – Developer Contributions. We require an **amendment** to Part A of this policy so that the “nature” of a development is considered as well as the scale and form of development. The Council is keen to support the reuse of previously developed land and buildings. As such the “nature” of an existing building, i.e. if it is Listed, would be considered within the context of viability throughout Section 106 negotiations. Part A of Draft Policy ID3 should therefore be amended to read “*scale, form and nature of development*”.