

IAIN BATH PLANNING

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Via Email: ldf.consultation@bradford.gov.uk

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IGB/tp

Dear Sirs

Local Plan for the Bradford District Core Strategy DPD Publication Draft

I write on behalf of my clients, The Marshall Group, in relation to the above document with comments setting out their views on the current content of the Core Strategy DPD Publication Draft document.

These representations follow an earlier submission dated 20 January 2012 to the Bradford Local Development Framework Core Strategy DPD Further Engagement Draft and specific representations made to the Bradford Shipley Regeneration Corridor Strategic Development Framework dated 8 June 2012.

Copies of both these submissions are appended for your background information.

General Context

At present Bolton Woods Quarry is an existing working quarry approaching the end of its life and it will become available for redevelopment in the short term.

The site is in excess of 40 ha, is of strategic size and scale and occupies an urban setting in the heart of the Bradford Shipley Canal Road Corridor.

The site is previously developed land situated in a highly sustainable location and represents the largest brownfield site in the district.

As is evidenced by the attached mineral reserve appraisal the site will be available for development by the end of 2016/early 2017 and consequently the land should be recognised within the Core Strategy as a strategic site capable of providing a significant level of development across a range and mix of land uses.

Strategic Objectives

The spatial vision for Bradford District contains a number of strategic objectives. My clients support the following key strategic objectives:-

1. A dynamic location for housing and economic growth within the Leeds City Region.

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2. The needs of housing, business and commerce to be met within sustainable locations.
3. To ensure associated critical infrastructure as part of development delivery.

Policy P1 (presumption in favour of sustainable development) which reflects National Planning Policy Framework guidance is supported by my clients. Furthermore, Strategic Core Policy 1 (SC1) is also supported which indicates that part of delivering the spatial and strategic objectives of the plan the transformation of the Canal Road Corridor Area will be a particular area of emphasis and key priority.

Strategic Core Policy 5 (SC5) deals with the location of development and is supported by my clients in that first priority is given to the reuse of deliverable and developable previously developed land within existing developed areas.

This context should be followed through in relation to my client's site in subsequent Allocations DPD and Area Action Plan DPD documents.

Sub-Area Policies (The Regional City of Bradford including Shipley and Lower Baildon)

The requirements set out within Sub-Area Policy BD1 in relation to housing numbers and employment land up to 2030 are noted. The broad distribution of housing development within the Shipley and Canal Road Corridor Area is acknowledged at a figure of 3,200 dwellings.

It is considered that further thought should be given by the Council to increasing this figure specifically for the Shipley and Canal Road Corridor Area given the land opportunities available for development and particularly the scale of my client's site.

It is also considered that a significant proportion of this housing requirement should be specifically identified for delivery from my client's site and identified as such as part of subsequent Allocations DPD and associated documents.

Within the sub-section B of Policy BD1 (Urban Regeneration and Renewal Priorities), recognition of the Bolton Woods Quarry site opportunity should be given specific reference as a strategic site recognising its importance in playing a significant and integral role in delivering this development priority (referenced later within the text of the plan at Section 4.1.8).

Thematic Policies

i) Economy and Jobs

The identification within Policy EC1 of the Canal Road Corridor Area (Section B) as a location for investment in order to create a more successful and competitive district economy is supported by my clients. It is noted within Policy EC3 (Section B) that the Canal Road Corridor Area is identified in emerging and current masterplans to provide for the employment land requirements within the City of Bradford Area (a total of 100 ha) and land will be specifically identified subsequently within the Allocations DPD document.

My client's site at Bolton Woods Quarry is capable of providing an element of employment as part of an overall mixed use strategic site and this should be more specifically acknowledged within the Core Strategy given its highly sustainable nature and scale. This would also accord with Policy EC4.

It is also noted that Policy EC5 includes the requirement to sustain and enhance the vitality and viability of a network and hierarchy of centres in the Bradford District by ensuring that new, appropriate scales of retail, leisure and office development are encouraged in sequentially preferable locations.

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More specific details aimed at delivering this context will be included within subsequent documents including the Shipley and Canal Road Corridor Area Action Plan DPD. The ability of the Bolton Woods Quarry site to play an important role within this should be acknowledged within the Core Strategy and advanced appropriately within the subsequent more detailed documents.

ii) Housing

Policy HO1 of the Core Strategy sets out 10 principles for achieving sustainable housing growth. This emphasises prioritising where possible the use and recycling of previously developed land and fully exploring the opportunities for housing growth to lever investment into remodelling and environmental improvements of existing urban areas.

The Bolton Woods Quarry site should be more specifically acknowledged within the context of this primary policy objective given its individual characteristics which fulfil all of these requirements.

Policy HO2 indicates the strategic sources of housing supply. It is noted within Paragraph 5.3.22 that this context reflects the Council's key regeneration priorities and programme particularly those which are geared towards delivering the regeneration and development of the Canal Road Corridor. My clients support this approach.

Paragraph 5.3.33 identifies the Shipley and Canal Road Corridor Area Action Plan as an area based initiative and growth area. My clients welcome this but consider that there needs to be more explicit recognition of their land asset at Bolton Woods Quarry as part of the strategic delivery of these requirements within the Core Strategy thus recognising the significance of the site.

In particular it is considered that perhaps the identified figure for the Canal Road Corridor Area Action Plan should be increased from 3,200 dwellings and whether this is or isn't taken forward the Bolton Woods Quarry site should, in any event, be identified within the subsequent Allocations DPD and associated Shipley and Canal Road Corridor Area Action Plan documents specifically as a site confirmed to deliver a significant proportion of this housing land requirement.

Given the strategic size of the Bolton Woods Quarry site and its integral location within the regeneration area it is considered that specific reference should be made within the Core Strategy to the Bolton Woods Quarry site as a strategic development opportunity.

Such acknowledgement would accord fully with the emerging context for the Canal Road Corridor Area as well as Policies HO6 and HO7 which seek to maximise the use of previously developed land and accord with housing site allocation principles.

iii) Implementation and Delivery

It is noted that Policy ID1 identifies the Shipley and Canal Road Corridor Area Action Plan DPD (Section 2) and indicates support for the work of the joint venture company established by the Council and Arnold Laver Group to deliver proposals for an urban eco settlement between Shipley Town Centre and Bradford City Centre.

Given the significance and scale of the Bolton Woods Quarry site within this area acknowledgement should also be made to the role that my clients can undertake in delivering these objectives. The Core Strategy should include specific reference to this and associated documents should be influenced by inclusion of my client's land asset with appropriate input and dialogue undertaken.

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Summary

The Marshall Group ownership of Bolton Woods Quarry is hugely significant within the context of delivering the objectives of the Core Strategy Policies and land requirements which will subsequently be specifically determined through the Site Allocations DPD and Area Action Plan designations for the Canal Road Area.

The strategic importance of Bolton Woods Quarry should therefore be specifically referenced within the Core Strategy and it is therefore requested that appropriate text be added at the relevant sections of the Plan to reflect this thereby establishing a defined context within which subsequent more detailed plan content can be advanced.

The Bolton Woods Quarry site occupies a remarkable urban setting within the heart of the Corridor area. The site represents the largest previously developed land opportunity within the district, is within single ownership and is available, deliverable and achievable at an early stage within the context of the overall framework.

Opportunities also exist as part of the site's redevelopment to provide significant and much needed levels of residential development and other supporting facilities as well as the potential for improvements and linkages to Canal Road and parallel linkages throughout the Bolton Woods area fulfilling the visionary objectives that the Council are wishing to progress.

The removal of the quarry use and its transformation to a redevelopment site will provide considerable environmental improvements to sit aside the residential, economic, social and infrastructure benefits that would come forward within the scheme proposals and the integration of the site into the wider corridor area initiative. It is therefore fundamental that the Bolton Woods Quarry site is properly recognised within the Core Strategy document as a strategic development opportunity and consequently it is requested that the Core Strategy Development Plan Document Publication Draft be amended accordingly.

I very much look forward to receiving your response to the comments made and in the meantime if you require any further information please do not hesitate to contact me.

Yours faithfully



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