

## IAIN BATH PLANNING

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**Via Email: [ldf.consultation@bradford.gov.uk](mailto: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, Hallmark Cards UK, in relation to the above document with comments setting out their views on the current content of the Core Strategy DPD Publication Draft document.

My clients are an existing major Bradford district-based company operating from two principal sites: Dawson Lane, Bradford and Bingley Road, Bradford together with associated woodland and fields.

These sites represent major land assets within Bradford district.

In recognition of the changing needs of my client's business operations it is important that the emerging Development Plan context provides suitable flexibility in land use terms to enable my clients to make informed decisions relative to redevelopment or new development on their landholdings over the course of the plan period.

### **General Context**

Whilst both of my clients sites are in current active employment based uses it may well be the case over the course of the plan period that certain areas of both sites become available for redevelopment. In this regard my clients wish to have comfort that alternative land uses would be appropriate giving them flexibility as part of any decision making process.

In this regard it is acknowledged that specific allocations or designations for their landholdings will be an exercise subsequently addressed as part of the allocations DPD following an approval of the Core Strategy. However, they do wish at this stage to register general comments that will assist this subsequent process.

### **Spatial Vision**

It is noted from Section 3 of the Core Strategy document that Bradford district requires a significant increase in the delivery of new houses within the plan period. Given that both of my clients sites are located within areas adjacent to existing housing this requirement is supported.

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The Core Strategy sets out a series of objectives indicating how the spatial vision for Bradford district will be delivered. Integral to these objectives is the need to ensure that the district's need for housing, business and commerce are met in sustainable locations. This follows National Planning Policy Framework guidance and is supported by my clients who regard both their sites as being in highly sustainable locations: one to the north of the main urban area of Bradford and one to the south.

In this regard my clients support Policy P1 of the Core Strategy which advocates a presumption in favour of sustainable development.

### **Strategic Core Policies**

Strategic Core Policy 1 (SC1) deals with the overall approach and key spatial priorities. The policy emphasises that planning decisions should seek to transform economic, environmental and social conditions of the district and in particular the regional city of Bradford and the Leeds/Bradford Corridor.

Both of my clients sites are located within this defined Corridor area and the emphasis of support for new development within this area is therefore supported by my clients.

Strategic Core Policy 4 (SC4) identifies the regional city of Bradford together with Shipley and Lower Baildon as the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the district. The greatest proportion of development and growth is proposed for this area. My clients sites are located within this area and consequently the policy objective is supported.

Strategic Core Policy 5 (SC5) addresses the location of development and emphasises that the first priority in achieving development requirements would be the reuse of deliverable and developable previously developed land as well as existing developed areas within the City of Bradford area.

Both of my clients sites would fall to be considered within this category and this emphasis is therefore supported.

Both my clients sites are also located adjacent to existing major transport infrastructure and would therefore be consistent with the Core Strategy advocated accessibility or orientated approach. This is supported and would be a relevant consideration as part of any subsequent Allocations DPD allocation or designation on my clients sites.

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

Sub-Area Policy BD1 sets out the proposed strategic pattern of development. Within both the north western and south eastern areas of the district significant levels of new housing is identified as being required (4,500 dwellings/6,000 dwellings respectively) as well as a total of 100 ha of new employment land up to 2030 in relation to the regional city of Bradford area.

Section C of Policy BD1 advocates significant levels of new residential development for both the south eastern and north western areas of the district together with associated community facilities and employment opportunities. The achievement in meeting these requirements in part through development and remodelling within the urban area is supported and both my clients sites would provide valuable opportunities in this regard for such alternative uses as part perhaps of mixed use redevelopment proposals.

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## **Thematic Policies**

### i) Economy and Jobs

Policy EC1 of the Core Strategy advocates that in order to create a more successful and competitive district economy, decisions will require economic growth, restructuring and diversification. My clients as a major Bradford based operation will require the flexibility to deal with such a context.

It is noted from Policy EC3 that the planned requirement for 135 ha of employment land within the district will be made up of 100 ha within the City of Bradford area. It is clear therefore that the Core Strategy envisages significant new employment land sites coming forward in locations considered suitable for employment use. Accordingly existing employment sites within areas where alternative land uses such as residential use might be more appropriate could be released as part of the Allocations DPD exercise. These would relate to both of my clients sites.

### ii) Housing

Policy HO1 of the Core Strategy outlines 10 principles for achieving sustainable housing growth prioritising wherever possible the use and recycling of previously developed land and buildings and fully exploiting the opportunities for housing growth to lever investment into the remodelling and environmental improvements of existing urban areas.

Both my clients sites are previously developed land within the existing urban area and this priority focus for new housing development is supported.

This accords with table HO2 of the Core Strategy which envisages that the most significant element of new housing will come forward on previously developed land. Table HO2 of the Core Strategy sets out an indication of the proposed settlement distribution for new residential development with 6,000 dwellings (14.3%) and 4,500 dwellings (10.7%) identified for the Bradford south east and north west areas respectively.

This represents a quarter (25%) of the overall district requirement, a significant level of required provision which could be greatly assisted by the availability of my clients sites during the plan period for residential development given their size and scale. These figures are replicated within Policy HO3 of the Core Strategy and the general levels are noted by my clients.

Policy HO6 of the Core Strategy advocates maximising the use of previously developed land with a clear priority given to the development of previously developed land and buildings. The policy emphasises the need for a minimum of 55% of the total number of dwellings to be subsequently allocated within the Allocations DPD on previously developed land.

My clients sites could provide a significant element towards the achievement of this total.

Policy HO7 sets out the housing site allocation principles. My clients sites would meet these various identified principles which would support their specific allocation as part of the subsequent Allocations DPD exercise.

## **Summary**

In general terms my clients support the policy context set out within the Core Strategy Publication Draft document which reflects National Planning Policy Framework guidance relative to sustainable development and the utilisation of previously developed land. Both of my clients sites are situated in highly sustainable locations and would represent previously

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developed land. Both sites would provide valuable opportunities in relation to meeting Development Plan land requirements.

It is acknowledged that the time for promoting these sites for specific allocation will come forward as part of progress on the Allocations DPD following approval of the Core Strategy. However, my clients do wish their comments to be given consideration at this stage so that a context is established for the submission of more detailed justification to be made in due course relating to identifying both of their sites for flexible mixed use redevelopment opportunities.

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



Iain Bath

