

Report of the Assistant Director (Planning, Transportation & Highways) to the meeting of Regulatory and Appeals Committee to be held on Monday 15 May 2017

AN

Subject:

Planning application for development at Milner Fields Farm, Primrose Lane, Gilstead.

Summary statement:

The committee is asked to consider a planning application, ref. 15/05538/MAF to develop an Innovation Centre (sui generis use) on the site of Milner Field Farm, Gilstead, involving the demolition of certain existing farm buildings, refurbishment and change of use of other existing farm buildings and construction of new innovation centre buildings, the formation of a new car park and the undertaking of ancillary landscaping, drainage and access works and landscaping works to the wider farmland to provide for enhanced public access, including to the remains of Milner Field House, and ecological enhancement. The application is an EIA application, within the meaning of the Environmental Impact Assessment Regulations and is accompanied by an Environmental Statement.

The proposed development is inappropriate development within the Green Belt. Although the development would be likely to result in significant economic benefits, and additionally some public and biodiversity benefits associated with proposed woodland planting and increasing public access to the site, including to the remains of Milner Field House, it is considered that these benefits do not clearly outweigh the harm the development would cause to the Green Belt.

The development would also cause other harm, in terms of substantial harm to the Saltaire World Heritage Site and erosion of its Outstanding Universal Value, harm to the historic landscape associated with Milner Field House, harm to the particular character of the local wooded incline landscape, potential harm to the integrity of the adjacent Trench Meadows SSSI and harm through a reduction in road safety at the canal bridge on Primrose Lane. When these other forms of harm are considered in combination with the harm the development would cause to the Green Belt it is considered that the benefits of the development/ other considerations put forward by the applicant clearly do not outweigh this cumulative harm.

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Portfolio:
Regeneration, Planning and Transport

Overview & Scrutiny Area:
Regeneration and Economy



1. SUMMARY

The Regulatory and Appeals Committee are asked to consider the recommendations for the determination of planning application ref. 15/05538/MAF made by the Assistant Director (Planning, Transportation and Highways) as set out in the Technical Report at Appendix 1.

The planning application is considered to sit in conflict with saved replacement Unitary Development Plan policies GB1 (New Building in the Green Belt), S/BH14 (Saltaire World Heritage Site), BH17 (Local Historic Parks and Gardens), NE3(A) (Landscape Character Areas), NE8 (Sites of Special Scientific Interest), TM2 (Impact of Traffic and its Mitigation) and TM19A (Traffic Management and Road Safety), emerging Local Plan Core Strategy Sub Area Policies BD1: The Regional City of Bradford and AD1: Airedale and Policy EN3: Historic Environment and the national planning policies set out in paragraphs 32, 87, 88, 118, 132, 133, 135 and 138 of the National Planning Policy Framework. Therefore refusal of planning permission is recommended.

2. BACKGROUND

Attached at Appendix 1 is a copy of the Technical Report of the Assistant Director (Planning, Transportation and Highways). This identifies the material considerations relevant to the assessment of the planning application.

3. OTHER CONSIDERATIONS

All considerations material to the determination of this planning application are set out in the Technical Report at Appendix 1.

4. OPTIONS

If the Committee proposes to follow the recommendation from the Assistant Director (Planning, Transportation and Highways) and refuse the application then the Assistant Director (Planning, Transportation and Highways) can be authorised to issue a Decision Notice refusing planning permission either for the reasons set out in this report or for any other reasons the Committee consider to warrant refusal of planning permission. Any reasons for refusal must be based upon development plan policies or other material considerations.

Alternatively, if the Committee decide that planning permission should be granted, they may grant planning permission either conditionally or unconditionally. Reasons for approval must be given which are based upon development plan policies or other material considerations. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

5. FINANCIAL & RESOURCE APPRAISAL

There is no requirement for a financial and resource appraisal in relation to the consideration of this planning application. The purported economic benefits of the proposed development are set out in the Technical Report at Appendix 1.

6. RISK MANAGEMENT & GOVERNANCE ISSUES

Not applicable.

7. LEGAL APPRAISAL

Both options set out above are within the Council's powers as the Local Planning Authority under the provisions of the Town and Country Planning Act 1990 (as amended). If planning permission is refused the applicant will have a right of appeal to the Secretary of State under the provision of Section 78 of the Act.

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 provide that, to the extent that development plan policies are material to an application for planning permission, planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.

8. OTHER IMPLICATIONS

8.1 EQUALITY & DIVERSITY

In writing this report due regard has been taken of the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between different groups and foster good relations between different groups, in accordance with the duty placed upon Local Authorities by Section 149 of the Equality Act 2010.

The context of the site, the development proposed and the representations which have been made have been reviewed to identify the potential for the determination of this application to disadvantage any individuals or groups of people with characteristics protected under the Equality Act 2010. The outcome of this review is that there is not considered to be any sound reason to conclude that refusing planning permission would unfairly disadvantage any groups or individuals with protected characteristics.

Equally, if the Committee resolved to grant planning permission, there does not appear to be any sound reason to conclude that allowing the development to proceed would unfairly disadvantage any groups or individuals with protected characteristics. Full details of the process of public consultation which has been gone through during the consideration of this application and a summary of the comments which have been made are attached at Appendix 1.

8.2 SUSTAINABILITY IMPLICATIONS

The National Planning Policy Framework advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It is not considered that the proposed development would contribute towards the achievement of sustainable development within the Bradford District. This is both because the proposal site is not a location where the need to travel to the innovation centre will be minimised and the use of sustainable transport modes can be maximised and also because the development will unacceptably harm the historic environment.

8.3 GREENHOUSE GAS EMISSIONS IMPACTS

Almost all development will result in the release of additional greenhouse gas emissions in relation to the manufacture of construction materials, the construction process itself, the energy which will be required to operate the proposed land use and the additional vehicular traffic which will be generated by people accessing the site. However these greenhouse gas emissions can be minimised by focusing development on existing population centres and highly accessible locations, incorporating low-energy construction materials, energy efficient buildings and micro-renewables and promoting sustainable modes of transport and the use of low emission vehicles.

It is acknowledged that the applicant has sought to minimise the greenhouse gas emissions associated with future vehicular traffic to and from the site through a travel plan framework which seeks to promote alternative modes of transport including walking, cycling and public transport and also by committing to providing 10% of the spaces within the proposed site 100 space car park with electric vehicle charging points. Nonetheless it is not considered that the location of the site is such that the need to travel to the innovation centre will be minimised and the use of sustainable transport modes can be maximised.

Therefore, although it is recognised that the applicant is agreeable to providing the level of air quality mitigation required by the Council's adopted Low Emissions Strategy, it should be recognised that the development of an innovation centre on an alternative site which was more centrally located and better connected to public transport/ cycle infrastructure would be likely to result in the release of less greenhouse gas emissions than would be the case for the proposed development.

8.4 COMMUNITY SAFETY IMPLICATIONS

The 'National Planning Policy Framework' makes clear that a key objective for new developments should be that they create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion. Design and access statements should demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places, as set out in Safer Places - The Planning System and Crime Prevention.

Saved policy D4 of the RUDP makes clear that new developments must incorporate the principles of secured by design, (SBD) and further states that developers will need to ensure that crime prevention is considered an integral part of the initial design of any development and not retrospectively or as an afterthought, in particular they will need to demonstrate how their development proposal has addressed the following issues in respect of designing out crime.

- 1) Natural surveillance of public and semi-private spaces in particular entrances to a development, paths, play spaces open spaces and car parking.
- 2) Defensible space and the clear definition differentiation and a robust separation of public, private and semiprivate space so that all are clearly defined and adequately protected in terms of their ownership and use.
- 3) Lighting in the development in particular streets and footpaths.
- 4) The design or any layout of pedestrian cycle and vehicular routes into and within the sites including how they integrate with existing patterns.
- 5) Landscaping and planting, hiding places and dark secluded areas should not be created.

The West Yorkshire Police Architectural Liaison Officer (ALO) has advised that, whilst there is a 'Design & Access Statement' submitted with the application that covers most points listed above, some areas require further clarification.

In terms of perimeter security the Police ALO has requested that either hedges/ planting are continued along the north and east of the site or that perimeter fencing is installed to around 1800mm which will provide more defensible space towards the rear of the development. The ALO has also recommended installing some form of access restriction on the main entrance such as lockable gates or access control barrier which

will prevent any unauthorised visitors from entering the development when the facilities are closed.

The ALO has also queried whether the existing track which leads towards Higher Coach Lane will be retained and used as an exit or emergency route, If this route is being retained the ALO has advised that it would be prudent to install some form of access restriction such as gated access along the hedge/ fence line to secure the boundary perimeter of the site.

The Police ALO has also requested the installation of lighting to cover the car parking areas and footpaths, in addition to the entrances and exits of the buildings. Any proposed lighting around the scheme should have good colour rendition and uniformity levels. In locations where impact on wildlife is a concern low level led lighting is suitable to use with hooded canopies which prevents any light pollution whilst still provide enough illumination to the areas required. The Police ALO has also requested the installation of monitored CCTV to cover the areas noted above including the inside of the buildings such as reception areas, entrances / exits, and work in conjunction with the lighting.

In relation to Physical Security the police ALO has suggested that, in relation to elevation 3 block B, the steel posts which support the canopies above the windows should be removed, as the posts could be used as a climbing aid to gain access onto the roof. If a canopy has to be installed it would be better if this was self-supporting in design, also elevation 4 block E, the Y frame steel supports again could provide a climbing element onto the sloped roof, it would be better if there were fewer canopy supports and if these were supporting each end.

Finally the Police ALO has advised that any door sets or ground floor or accessible windows look to achieve SBD standards. The main reception entrance should have some form of access control such as electronic intercom system that is vandal resistant, (DDA) Disability Discrimination Act compliant with CCTV and audio capabilities, in addition to access control on the main buildings such as swipe card reader / key fob access (which are security encrypted to prevent unauthorised copying) or key pad access which will prevent any strangers from entering the buildings.

The Police ALO has confirmed that West Yorkshire Police have no objection in principle to the proposal should the above recommendations be applied.

8.5 HUMAN RIGHTS ACT

The Council must seek to balance the rights of applicants to make beneficial use of their property with the rights of nearby residents to quiet enjoyment of their land; together with any overriding need to restrict such rights in the overall public interest. In this case there is no reason to conclude that either refusing or granting planning permission will deprive anyone of their rights under the Human Rights Act.

8.6 TRADE UNION

There are no implications for Trades Unions relevant to this application.

8.7 WARD IMPLICATIONS

The proposal site is within the Bingley Ward. Ward Councillors the Parish Council and local residents have been made aware of the application and have been given opportunity to submit written representations through three rounds of publicity. The

application was publicised as a Major Development Proposal accompanied by an Environmental Statement.

In response to this publicity 1,376 written representations have been received, 1,370 of which object to the proposal and 6 of which support the proposal. In addition objections have been made by Ward Councillors from both the Bingley and Shipley Council Wards, Baildon and Bingley Town Councils and the local Member of Parliament.

A summary of the representations which have been received and an assessment of the impact the proposed development is included in the report at Appendix 1.

9. NOT FOR PUBLICATION DOCUMENTS

None

10. RECOMMENDATIONS

To Refuse Planning Permission.

11. APPENDICES

Appendix 1: Technical Report

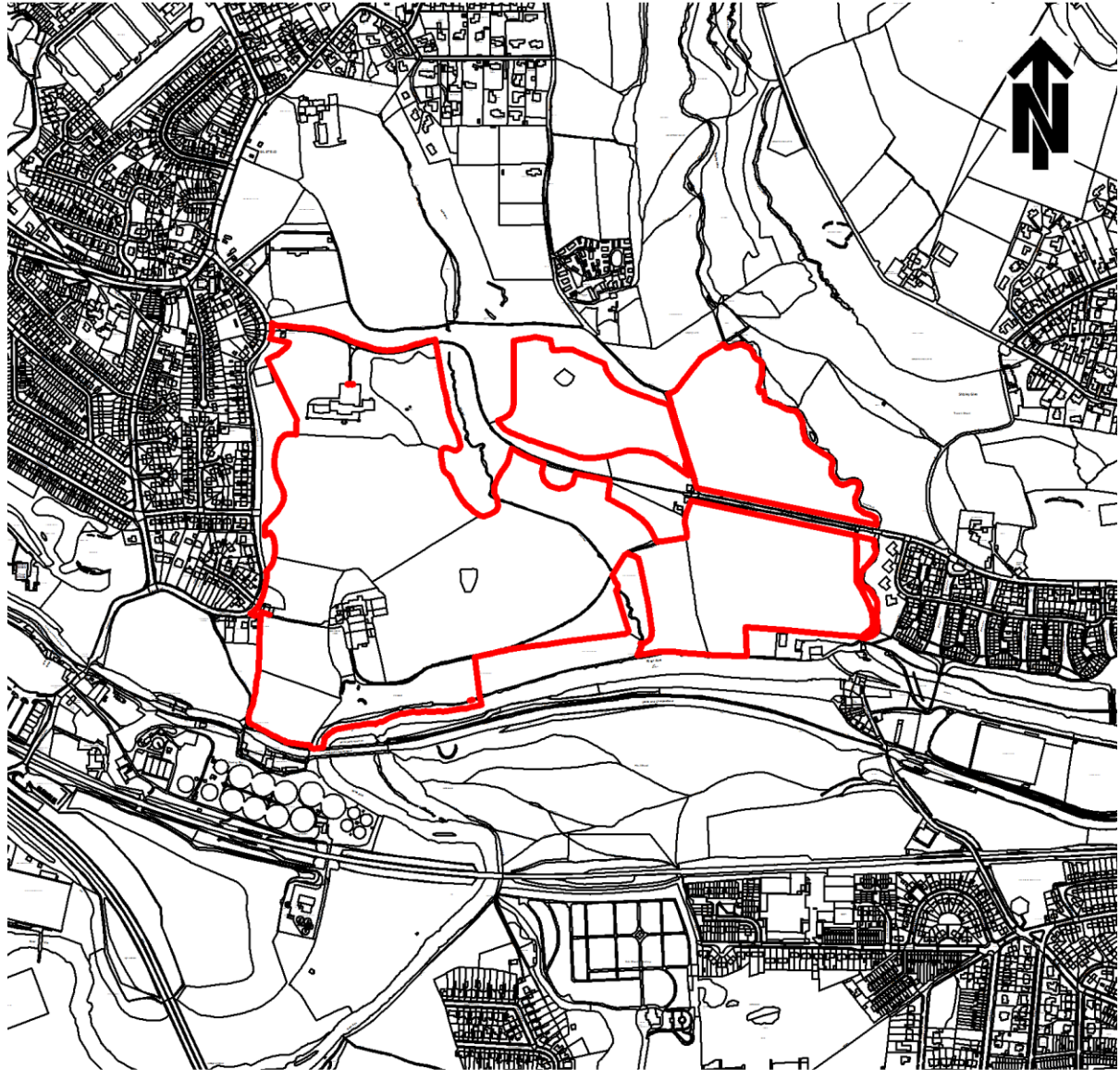
12. BACKGROUND DOCUMENTS

- Replacement Unitary Development Plan for the Bradford District
- Direction under paragraph 1(3) of schedule 8 to the Planning and Compulsory Purchase Act 2004 policies contained in the City of Bradford Metropolitan District Council replacement Unitary Development Plan adopted October 2005
- Core Strategy Development Plan Document Publication Draft
- Proposed Main Modifications Composite June 2016
- National Planning Policy Framework
- Application file 15/05538/MAF

15/05538/MAF

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**Milner Fields Farm
Primrose Lane
Gilstead Bingley
BD16 4QU**

15 May 2017

Ward: Bingley
Recommendation:
To Refuse Planning Permission

Application Number:
15/05538/MAF

Type of Application/Proposal and Address:

Full planning application, ref. 15/05538/MAF, to develop an Innovation Centre (sui generis use) on the site of Milner Field Farm, Gilstead, involving the demolition of certain existing farm buildings, refurbishment and change of use of other existing farm buildings and construction of new innovation centre buildings, the formation of a new car park and the undertaking of ancillary landscaping, drainage and access works and landscaping works to the wider farmland to provide for enhanced public access, including to the remains of Milner Field House, and ecological enhancement.

Applicant:
Bradford Innovation Centre Ltd

Agent:
Halliday Clark

Site Description:

The proposal site is a 42 hectare active dairy farm known as Milner Field Farm located to the east of Gilstead, south-west of Baildon and north-west of Saltaire. The site lies on the lower northern slopes of this section of the Aire Valley, with the River Aire lying immediately adjacent to the site's southern boundary and the parallel Leeds and Liverpool Canal lying a short distance beyond. A small watercourse discharging to the Aire transects the central part of the site.

The site includes a mixed landscape comprising dry stone wall and fence bounded grazing fields of an irregular pattern, the remnants of the historic parkland landscape associated with Milner Field House and patches of woodland, with more extensive woodland areas lying to the north-east and south. The remains of Milner Field House exist within the north-western area of the site, within which woodland has regenerated. The old Coach Road which linked Milner Field House to Saltaire transects the fields within the eastern part of the site, before running to the north of the site boundary.

The main farm building complex, including the farm house, an old U-shaped stabling block, more modern storage and stabling sheds and a slurry tank, is located within the south-western part of the site. The main access to this building complex is via an access track off Primrose Lane. The farm access is single carriageway and has a 12 metre wide dropped-crossing onto Primrose Lane. An old gatehouse adjacent to the site access onto Primrose Lane now appears to be being used as an independent residential dwelling.

Primrose Lane crosses the Aire to the south-west of the site via Scourer Bridge, before crossing the canal over a narrow single carriageway bridge, with no footway, known as Fisherman's Bridge. A further bridge crosses the railway line which runs along the bottom of the Aire Valley. The land between the railway line and the canal is partly occupied by a small business park and sewerage works. After the railway bridge Primrose Lane becomes Dowley Gap Lane and passes a household waste recycling centre before crossing over the A650. The road then becomes Wagon Lane for the remaining short section before its junction with Bradford Road. Wagon Lane serves as an access to Beckfoot School, which is located between Bradford Road and the A65, and also to an adjacent recreation ground which is the home of the Bradford and Bingley Sports Club.

Adjacent land uses comprise the residential area of Gilstead to the west, woodland and additional agricultural grazing land to the north, with a dwelling at north lodge (the head of the coach road) and also a small caravan park located to the north-east. The Trench Meadows SSSI (Site of Special Scientific Interest), areas of woodland and housing are located to the east and woodland and a sewerage works lie on the immediately adjacent land to the south beyond the river and canal, with the additional land uses described above lying further to the south/ south-west.

Relevant Site History:

15/00623/SCO - Request for EIA scoping opinion in respect of the development of a proposed Innovation Centre – Scoping Opinion Issued 17/04/2015

93/01994/FUL – Slurry store – Granted 01/10/1993

81/07/02846 – Residential Development – Refused 15/07/1981

Replacement Unitary Development Plan (RUDP):

Allocation

- The proposal site is within the Green Belt as defined by the RUDP Proposals Map.
- The whole of the site is within the Saltaire World Heritage Site Buffer Zone.
- The site includes an area of historically important parkland as identified by RUDP policy BH17 and is adjacent to the Leeds and Liverpool Canal Conservation Area.
- The proposal site also includes several areas of woodland which are identified as Bradford Wildlife Areas on the Proposals Map and is adjacent to the Trench Meadows SSSI to the East.

Proposals and Policies

The following saved policies of the replacement Unitary Development Plan are considered to be most relevant to the planning application:

- GB1 (New Building in the Green Belt)
- S/BH14 (Saltaire World Heritage Site)
- BH17 (Local Historic Parks and Gardens)
- NE3(A) (Landscape Character Areas)
- NE8 (Sites of Special Scientific Interest)
- TM2 (Impact of Traffic and its Mitigation) and
- TM19A (Traffic Management and Road Safety)

The following emerging policies of the Local Plan Core Strategy are considered to be most relevant to the planning application:

- Sub Area Policy BD1: The Regional City of Bradford
- Sub Area Policy AD1: Airedale
- Policy EN3: Historic Environment
- Policy EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region

The National Planning Policy Framework (NPPF):

The NPPF sets out a presumption in favour of sustainable development which means that development proposals which accord with the development plan should be approved without delay. Where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole;
- or specific policies in the NPPF indicate development should be restricted.

The proposal does not accord with the Development Plan and therefore it must be considered both whether any adverse impacts of the development would significantly and demonstrably outweigh the benefits of the development, when assessed against the policies in the NPPF taken as a whole and whether any specific policies in the NPPF indicate development should be restricted. The following paragraphs of the National Planning Policy Framework are considered to be most relevant to the planning application:

19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system

32. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

34. Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

136. Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

137. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

138. Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Parish Council:

Bingley Town Council

Bingley Town Council recommends that this application be refused on the following grounds:

1. It wishes to reiterate its objections to the previous application:
 - a. The proposed development is an unsustainable site.
 - b. There is poor traffic access
 - c. The proposed development is in the Green Belt
 - d. There are highways objections
 - e. We support the comments of the World Heritage Site Officer in 2.1 where they state “the level of detail in this application is insufficient and it is unclear what actual research activity is proposed for the site”. We would seek confirmation from Bradford University of the research they wish to carry out with sufficient detail for our consideration.
 - f. If the application is approved by Bradford Council, the Town Council requests that the application is referred to the Area Planning Panel

In addition the Town Council would like to make the additional objections:

1. Bingley Town Council objects to the loss of the historic farm and the loss of livelihood for the farmer and his 9 employees

2. The Town Council supports the draft document dated 12th March 2017 compiled by Mr Les Brook, ' An Alternative Landscape Management Plan Crafted by the Community

Baildon Town Council

Baildon Town Council objects to this application on the following grounds:

The land is in the green belt. Whilst it is recognised that in order to meet housing needs there may have to be some incursion into the green belt within the district this development is not within the housing sector. Several objectors have already pointed to the fact that suitable brownfield sites are available locally. This incursion is therefore unnecessary

In addition the intensified use will be such as to compromise the openness of the greenbelt and affect its recreational value as per our later point.

The protection of the green belt and encouragement to use brownfield is contained in the National Planning Policy Framework, from which p 6 para 17, Core planning principles states, 'Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should ...

- 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it';

- 'encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value'.

The development proposed is on an active dairy farm providing employment and services to local people. The current tenant farmer's family have been on the land since 1902 and this development threatens their livelihood.

The increase in traffic, particularly along Dowley Gap Lane and Primrose Lane will lead to dangerous situations for motorists and pedestrians. The narrow and historic canal bridge is not suitable for large vehicles or high volumes of traffic. Wagon Lane is already too busy a road that runs alongside Beckfoot School. Any increase of traffic along here would bring an unnecessary risk to the students, especially during arrival and closing times.

The proposed development is within the World Heritage Site Buffer Zone. The structures will change the vistas from a number of points around the valley as outlined by Helen Thornton, the World Heritage Site Officer for Saltaire in her submission. We believe that this will be detrimental to the setting of Saltaire WHS within its surroundings.

The site is one of great heritage. The farm has the footprint of a Victorian 'model' farm that is one of the last remaining examples of its kind in the country, with its classic C-shape buildings around a central courtyard and built to an extremely high specification in its heyday. Heritage such as this must be protected.

The NPPF states at para135, the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. And later that planning should recognise, the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

There will be Increased Flood Risk. Many of the roads close to the river in Bingley and Shipley were badly affected by flooding in December 2015. Such development could lead to aggravation of the problem by reducing soak away from the area

The area is on which is used by many people for recreation. This is enhanced by the Farm as something that is pleasing to the eye. To replace the view with a research establishment which may of necessity need to have security features in future will detract from people's enjoyment of the area for recreation.

Publicity and Number of Representations:

The application was publicised as a Major Development Proposal accompanied by an Environmental Statement through the posting of site notices and neighbour notification letters and the publication of a press advertisement. Three separate rounds of publicity have been undertaken, with the initial application publicity being published in November 2015 and subsequent rounds initiated in April 2016 and then February 2017, as a consequence of revised proposals and further information being submitted by the applicant.

In response to this publicity 1,376 written representations have been received, 1,370 of which object to the proposal and 6 of which support the proposal. In addition objections have been received from Ward Councillors from both the Bingley and Shipley Ward, Baildon and Bingley Town Councils and the local Member of Parliament.

Summary of Representations Received:

Principle

- The proposed innovation centre is inappropriate development within the Green Belt.
- The Green Belt area should be retained properly intact as a buffer to complement the Saltaire World Heritage site.
- The benefits and circumstances listed by the applicant do not counterbalance the harm the development would cause and therefore very special circumstances do not exist.
- The application would result in closure of an active dairy farm which is a land use which benefits the local community and is an appropriate use within the Green Belt.
- The food production at the existing farm contributes towards the sustainability of the local community and the farm is a local employer.
- The farm also has links to education establishments and offers agricultural work experience opportunities which would be lost if the development were to proceed.
- The application could be seen as a mechanism to allow the landowner to end the agricultural use of the land and open up development opportunities for the site which may not be limited to the current innovation centre proposal.

- There are many more appropriate sites available for the development of an innovation centre, including brownfield sites and sites within the existing centres of Bingley and Bradford which would be more accessible and offer greater opportunities to integrate with existing businesses and educational establishments.
- The government has stated that development on greenfield sites should only be granted when all other avenues have been explored and only as a last resort.
- The support of Bradford University for the development has been exaggerated by the applicant.
- The land is a working farm, worked by the same family for a number of generations. They would be put out of business and lose their home thus having a significant detrimental effect on the lives of the family and employees of the farm.
- This innovation centre has not demonstrated that it has to be built here.
- The site is too far from Bingley, Gilstead or Saltaire to bring any benefits to shops & facilities in these areas - limited free parking in Bingley makes it unlikely that employees on the site would travel in for lunch, shopping etc.
- The development would set a dangerous precedent for other development in this green belt area between the urban areas of Shipley and Bingley.
- The Permitted Development rights for the change of use of agricultural buildings to various other use classes have no relevancy to the proposal as the application states that the development would be a *sui generis* use.
- The fact that the applicant considers there to be a lack of harm to the Green Belt associated with the proposed development cannot be taken as a very special circumstance when the development is inappropriate development and therefore, by definition, harmful.
- The applicant has put forward no evidence to demonstrate why a Green Belt location is required for the Innovation Centre.
- The Local Plan will allocate 30 hectares of employment land within the Airedale Corridor, the proposed innovation centre is exactly the type of development which should be delivered on this allocated land.
- As a matter of principle and precedent the proposed ecological and public accessibility enhancements cannot be considered to outweigh the harm which will be caused to the Green Belt.

Economic/ Viability Issues

- If approved, the application will lead to the closure of a successful local agri-business and the weakening of the local economy.
- If the application is successful, three outcomes are certain: the Downs family will be evicted; farming will no longer take place at Milner Field; and a successful Gilstead business will close and jobs will be lost.
- In the short to medium term the project will undoubtedly result in economic and social loss.
- The applicant has put forward not evidence to demonstrate that the scheme is fully funded.
- The absence of even rudimentary business, financial or marketing plans does not inspire confidence in the project.
- All innovation centres are reliant on public funding both in the short and long term. The applicant does not acknowledge this, has not planned for it, and is in a weak position to get it.

- Whilst the national economic argument for innovation centres is well-founded, none have proven records of success. As a result, their economic benefits cannot be calculated.
- There is a strong case for saying the proposal is not viable - and therefore cannot result in sustainable development.
- There is a very real danger that the outcome of the planning process will be no farm and no Innovation centre.

Heritage

- Saltaire's setting has the same protection as the World Heritage Site itself, i.e. it has "the highest level of national protection".
- The buffer zone is part of the setting of the World Heritage Site. Milner Field Farm is in that zone
- Milner Field Farm therefore has "the highest level of national protection": development which would cause it substantial harm should be wholly exceptional and must only be permitted where substantial public benefit outweighs the harm.
- Bradford Council policy is that, within the Saltaire buffer zone, development that might result in the loss of heritage fabric will be refused.
- The Milner Field Farm buildings are long-established and have a historical, cultural and heritage significance that should be conserved as an absolute priority.
- The Farm itself through its proximity to the Milner Field estate should essentially be regarded as part of the greater Saltaire area which has UNESCO World Heritage status.
- The farm was built as a Model Farm by Titus Salt Junior. It had not been realised by local historians, how significant that history was when the first planning application was made.
- Previous research has not specifically identified that the farm was a model farm and neither has it identified that the Salt family were involved in agriculture to the extent that they were. The research highlights the fact that it was no accident that Milner Field model farm was sited next to the model village at Saltaire.
- There is no other example nationally of a model village and model farm developed by the same family and planned to be in such close proximity to each other. This makes Saltaire and Milner Field Farm unique and historically important and significant. The fact that the Salt family also built another model farm at Ferniehurst, Baildon shows their commitment to the concept. This is now no longer a farm.
- Although altered to some extent to meet changing farming needs over the last 145 years Milner Field farm continues to occupy the same footprint, essentially the same buildings, layout and land as it did when it was originally designed as a model farm circa 1872.
- There are few examples locally or nationally of any farms originally built as a model farm which are still fulfilling their original purpose i.e. farming, on the same site. This again makes Milner Field Farm unique and historically important and significant in both a local and national context.
- The proposed development would destroy the farm through the demolition and conversion of buildings, the change in land use and the proposals to plant out the fields into woodland; this would cause substantial and irreversible harm to the Outstanding Universal Value of the Saltaire World Heritage Site.

- The fact of a continuation of the farm from the Salt family to the present day should be celebrated and the farm protected from change of use and inappropriate development.
- The site is visible from the World Heritage Site and views into Saltaire and the historic gardens will be affected by the construction of the new buildings. The existing farm house and buildings are in keeping with their surroundings, the construction of the new innovation centre will harm the setting and views into the World Heritage Site as well as demolishing a historic part of Saltaire History.

Highways

- The proposal site cannot easily be accessed using public transport and is not in a sustainable location.
- There are no direct public transport links to the site, the nearest bus route now having a reduced
- The local road network is not adequate to support the increased traffic (particularly from a safety perspective), particularly the single track bridge by the Fishermans.
- The submitted Transport Assessment exaggerates current farm traffic and underestimates the traffic impact of the development.
- The Transport Assessment does not include any assessment of the surrounding highway network.
- The estimate of trips associated with the existing farm operations is believed to be highly inaccurate.
- The TRICS data used to estimate the development trip generation is based on characteristics that differ from the proposal which is highly inaccurate.
- Accident data should be updated.
- The development would create unacceptable highway safety risks, particularly at Fisherman's Bridge.
- The site access is unsafe.
- No tracking drawings have been provided in order to confirm whether large vehicles will have access to the site.
- Dedicated pedestrian access to the site has not been provided.
- The proposal to mix pedestrians on a narrow access road with insufficient width is considered to be unsafe and inappropriate.
- The proposed site would have an entrance on a dangerous bend.
- Transportation links to the site are unsuitable and the site would be detrimental to the local schools and surrounding communities in terms of road safety.

Natural Environment

- The development will increase the impermeable area of the site which will increase flood risk.
- The development would be an unwelcome intrusion into the quiet and unspoilt green oasis between Shipley and Bingley,
- The proposal site is part of the green lungs and green infrastructure of the area and the development would erode this function.
- The development would threaten the wildlife which the farm currently provides a habitat for, such as hedgehogs and bats.
- The landscape management and habitat creation proposals put forward by the applicant are inappropriate to the ecology and landscape of the area.

- I object to the change of use of the farm that has been a family business for such a long time. I feel it will spoil the beautiful landscape and destroy lots of wonderful wildlife.
- If agricultural land close to the River Aire is developed there will be an increased flood risk.
- The additional proposals for the area surrounding the proposed innovation centre, while being a welcome attempt to begin to take care of the area, are not proven to be sustainable either financially or ecologically in this situation. If the owner is genuinely interested in promoting the site for public and educational use, he could work with the current farmer, Mr Downs, who is in a better position to enhance the ecological value of the farmland, while maintaining its heritage and adding to Saltaire's story.

Alternative Landscape Management Plan

- Objectors have submitted an alternative landscape management plan which has been endorsed by various community groups including:
 - Baildon Local History Society
 - Bingley Local History Society
 - Bradford Urban Wildlife Group
 - The Downs Family
 - Eldwick Village Society
 - The Friends of Bracken Hall
 - The Friends of Roberts Park
 - Gilstead Village Society
 - Higher Coach Road Residents Group
 - Hirst Wood Regeneration Group
 - Jamie Roberts
 - Nicholas Salt
 - Saltaire History Club
 - Saltaire Village Society
 - Saltaire Walks and Talks
- The alternative management plan seeks to conserve heritage features associated with Milner Field Farm, and to establish a more accessible, environmentally sound and bio-diverse farm.
- The plan does not propose any built development or enclosure works on the site but proposes a number of short-medium and long term actions to realise the stated objectives of:
 - The development and implementation of a plan to encourage bio-diversity.
 - The improvement of existing farming systems and practices in order to support the bio-diversity plan.
 - The development and delivery of a programme of environmental and agricultural education which will include support to programmes in formal education.
 - The delivery of a programme of heritage education.
 - The improvement of signage and access to Milner Field mansion and parkland.
 - The development and implementation of a conservation and restoration plan for the Farm buildings and landscape.

Consultations:

Biodiversity

I have reservations about the proposals and remain opposed to the loss of local agricultural business (with further impact on other local businesses) and grazing land-use.

The revised proposals for substantial increase of woodland planting areas, could potentially, in the long-term, provide some increase in overall biodiversity; however, the proposed planting mix doesn't appear to be based on any particular, local NVC woodland community and therefore misses the opportunity for a robust, ecologically led approach to enhancement. There is no indication how a diverse woodland field layer would be developed, given that the current grassland is relatively 'improved' (i.e. fertilised)

It is acknowledged that the current site has a low ecological baseline, however, the extensive woodland planting covers some of the few areas where the existing grassland has greater biodiversity value.

The previous proposals indicated deer fencing would be required to allow for new woodland to establish. The increased woodland areas proposed would likely to require significantly more deer fencing which Natural England have rightly pointed out would impede foraging/commuting of local wildlife and would also have a visual impact on the World Heritage Site, along with the changes to the planned historic landscape .

The comments from Rosetta regarding their disappointment that the Council was unwilling to allow a seed source from Trench Meadows SSSI for the Wood Meadow proposals causes concern, because a) the Council was never formally approached with such a proposal and b) Trench Meadows SSSI is managed by grazing and has Countryside Stewardship agreement with Natural England. Therefore a 'seed source' is not available under this management regime. Any changes to the stewardship agreement would have to be negotiated with Natural England.

I therefore still cannot support the proposals.

Campaign to Protect Rural England

It is clear from the scale of public objections to the case that the community feels strongly that the scheme would be inappropriate. Comments from your own Conservation Officer and World Heritage Site Officer support this with direct reference to the landscape, the history of the site and the impact on Saltaire World Heritage Site.

NPPF allows for re-developments of previously developed sites within the Green Belt if they do not impact on the openness of the Green Belt, or on the purpose of the land being included within it. This test would only be triggered if the farm buildings were redundant and had resulted in a brownfield site: this is clearly not the case here, since the farm is a successful, going concern, and we understand that the tenant has recently secured their right to the ongoing tenancy. The tenant would obviously not have gone to this trouble if there were any doubt about the viability of the existing use.

In any event, changing use from a farm to a series of business units is clearly a significant intensification of use of the site (even if the built footprint remains the same), and such intensification is not appropriate to its Green Belt location, and is at odds with the purpose of the land being included in the Green Belt.

In summary, there is no justification for displacing a successful farm business that is providing important stewardship in a sensitive location, in order to pursue inappropriate development in the Green Belt. CPRE therefore asks that you refuse these applications.

Canal and River Trust

Due to the existing topography and location of existing woodland and the River Aire, the landscaping works shown will not have a significant visual impact on the Leeds and Liverpool Canal and its users or the heritage assets associated with the canal.

However, we note that the landscaping works shown in the Landscape Statement by Rosetta Landscape Design and Ecological Management Plan by Ecological Estates Ltd (both dated on the Local Authority Website on 16th February 2017) do not extend up to the full boundary line of the Location Plan, notably to the south west of the site, where the site adjoins the Leeds and Liverpool Canal.

We presume no works are proposed in this area. However, we would advise that it is clarified as to whether any landscaping works are proposed in this part of the site prior to an application being determined.

Should any works be proposed, we would wish to be consulted upon the details of these, if provided as additional information to this application or as details reserved by condition.

Drainage Unit/ Lead Local Flood Authority

The Lead Local Flood Authority (LLFA) has assessed the documentation relating to the surface water disposal on the proposed development, against the requirements of the National Planning Policy Framework and Planning Practice Guidance. Notwithstanding all the documentation submitted, an assessment of the submitted Flood Risk Assessment reference 14114/I/01 has been carried out and if the following details are implemented and secured by way of a planning condition on any planning permission the Lead Local Flood Authority have NO OBJECTION to the proposed development.

Condition:

1. The development shall not commence until full details and calculations of the proposed means of disposal of surface water drainage have been submitted to and approved by the local planning authority.
2. The surface water drainage infrastructure serving the development shall be managed in strict accordance to the terms and agreements, over the lifetime of the development, as set out in a Surface Water Drainage Maintenance and Management document to be submitted to the Lead Local Flood Authority for approval.
3. The maximum pass forward flow of surface water from the development shall be restricted to a rate agreed with the Lead Local Flood Authority.

The Lead Local Flood Authority is a statutory consultee on matters relating to surface water management on all major developments. The Drainage Department will therefore cease from providing comments on the surface water drainage proposals on major

planning applications. Insofar if the following details are implemented and secured by way of a planning condition on any planning permission the Drainage Department have NO OBJECTION to the proposed development.

1. No development shall take place until full details and calculations of the proposed means of disposal of foul water drainage have been submitted to and approved by the local planning authority

Environment Agency

We note that the new location plan submitted now covers flood zones 2 and 3. However the development itself has not changed and is still showing as being located solely in flood zone 1 and that surface water is still proposed to discharge into the beck (east of the site) which is considered to be an 'ordinary watercourse'.

We therefore have no objections and our previous comments from our response dated 21/12/15 still remain valid.

It is recommended that services should be raised as high as practicable to avoid possible flood damage.

We recommend that consideration be given to use of flood proofing measures to reduce the impact of flooding when it occurs. Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels. Consultation with your building control department is recommending when determining if flood proofing measures are effective.

Additional guidance can be found in our Flood line Publication 'Damage Limitation'. A free copy of this is available by telephoning 0845 988 1188 or can be found on our website www.environment-agency.gov.uk click on 'flood' in subjects to find out about, and then 'floodline'.

Reference should also be made to the Department for communities and local Government publication 'Preparing for Floods' <http://www.planningportal.gov.uk/uploads/odpm/400000009282.pdf> as well as the communities and local Government publication 'Improving the flood performance of new buildings' which can be viewed at: <http://www.communities.gov.uk/publications/planningandbuilding/improvingflood>.

Environmental Health – Air Quality

The proposed levels of parking and traffic generation associated with this application indicate that it constitutes a medium development for the purpose of Appendix 2 (Land use planning and road transport emission guidance) of the Bradford Low Emission Strategy (LES)(adopted November 2013), addendum to the Bradford Air Quality Action Plan (March 2013). This guidance supersedes the EPUK air quality planning guidance note in relation to planning and air quality / emission considerations in Bradford.

Under the provisions of the LES planning guidance **medium** developments are required to provide Type 1 and 2 emission mitigation as follows:

- Provision of electric vehicles charging facilities at 10% of the total parking spaces, (this may be phased with 5% provision initially and a further 5% at a later trigger)

- Adherence to the London Best Practice Guidance on the Control of Dust and Emissions from Construction and Demolition
- A Travel Plan which will discourage the use of high emission vehicles and facilitate the uptake of low emission vehicles.

Applicants are also required in some circumstances to submit an exposure assessment.

Exposure Assessment Requirement - It is unlikely that users of the proposed innovation centre would be exposed to concentrations of air pollutants above health based air quality objectives. On this basis an exposure assessment is not required.

Electric Vehicle Charging Requirement - The application indicates that there will be approximately 100 parking spaces provided and that EV charging will be provided in line with the requirements of the Bradford LES.

Construction Emission Management Plan (CEMP) - The applicant will be required to submit a CEMP for approval prior to the commencement of any works on the site. This must set out how they intend to adhere to the London Best Practice Guidance on the Control of Dust and Emissions from Construction and Demolition.

Low Emission Travel Plan - The travel plan framework submitted with this application indicates that there will be good walking, cycling and public transport provision at the site and makes some reference to the provision of EV charging points for the purpose of promoting low emission vehicle uptake.

The approach to encouraging the uptake of low emission vehicles could be strengthened further by:

- Actively promoting the purchase of low emission vehicles by staff
- Providing low interest loans for purchase of low emission vehicles
- Providing low emission pool cars for staff journeys (if applicable)
- Developing low emission procurement policies (e.g to ensure goods from third parties are delivered using low emission vehicles)
- Supporting low emission public transport in the area
- Setting targets for the uptake of low emission vehicles by people using the site / number of electric vehicle recharging events per annum

These issues should be considered further during the development of any subsequent travel plans for the site.

Heating and Power- It is not clear from the application how the applicant intends to provide heat and power to the site. It should be noted that the use of biomass boiler technology is not considered appropriate in this location.

Recommended Conditions- If the Local Planning Authority is minded to approve planning permission it is recommended that the relevant air quality related conditions are applied which address the matters set out above.

Environmental Health – Land Quality

- Historic land use data indicates the site has been previously occupied by a dairy farm. The PWA Phase 1 report identifies agricultural chemicals, made ground and other potential sources of contamination
- Therefore, Environmental Health concurs with the applicant's Phase 1 geoenvironmental assessment that intrusive investigation should be undertaken to refine the Conceptual Site Model and characterise the ground conditions.
- In this particular situation, Environmental Health would have no objections a site investigation being required by condition.
- Environmental Health therefore recommends that relevant site investigation & remediation conditions are included on the decision notice.

Heritage Conservation

The landscape at Milner Field Farm was planned by an eminent landscape architect of the day, Robert Marnock. It was intended in the main as a working farm, with more formal planting in proximity to the mansion. The farmland was planned to provide open pasture, with deliberate specific tree planting on the peripheries and in small clumps, both to complement the overall desired landscape effect, and to screen elements which it was better not to see.

The proposal to 'naturalise' the landscape will result in a differing visual presentation to grazed meadow. Additional tree planting will significantly change the visual impression sought by Marnock and which was considered fashionable, for predominantly open pasture with structured tree planting. In combination, these changes will substantially impact the landscape character and historic significance of this landscape, contrary to BH17.

The drawing relating to the 'historic house' 333.07.(SK)035 (A) is ambiguous and without substance. The whole of this wooded part of the estate is presently accessible and has been, without restriction, for many years. The woodland has been unmanaged and hence has become overgrown, although there is evidence of the historic layout and specimen planting in amongst. The submission gives no indication of how the house footprint is to be 'cleared' which could cause harm to its significance. The piles of rubble existing are not the safest of environments and would require further work to make accessible. This has both archaeological and heritage implications, neither of which are addressed here, and which would have significant cost implications.

The various areas of tree clearance illustrated would have a significant impact on the landscape. There is no indication that this would be done with proper regard to woodland management principles (the area being fully covered by TPO) or having respect for the original planting and landscaping regimes. This could therefore result in harm and not benefit. The scattering of interpretation and benches is meaningless and brings minimal benefit. The wider estate and woodland requires proper management to bring any real benefit and to allow it to endure in a meaningful way for the future. The proposals give no indication of how the enhancements would be subsequently maintained, without which this is a pointless one-off exercise which would rapidly degenerate.

In summary the proposals for the historic house area risk substantial harm to the understanding and significance of the remains and landscaping here, provide negligible benefit and arguably seek to present spurious benefits to distract from the harm arising from the principle of the development. The proposals in the area of the historic house have so little substance that they must be concluded to cause substantial harm to the undesignated asset and wholly conflict with policies BH17 and UDP3.

The car parking, lighting and general presentation of the environs of the proposed 'innovation centre' also continue to conflict with the purposes of Policy BH17, as has been previously advised.

Highways Development Control

Further information has been submitted by Halliday Clark in the form of an email (dated 07.04.2017), which also includes an attached Transport Assessment Addendum document, in support of the planning application.

The email has been submitted by the agent to demonstrate that other developments in the Bradford Metropolitan District have been supported by the Council even though these have also led to intensification in use of single lane bridges leading to and/or from the site. The addendum document also provides additional details on the traffic movements to and from the proposed development and its likely impact on the bridge.

In response to these I would comment as follows:

Halliday Clark Email dated 07/04/2017 - Swing Bridge at Apperley Road - The approaches to this bridge are straight & level and intervisibility between drivers of on-coming vehicles is excellent. Some pedestrian facilities also exist on the bridge in the form of narrow 'footways' with a raised kerb edge, which would accommodate single file movement of pedestrians. A 'priority' system for controlling vehicular movements over the bridge also exists and the bridge is not on direct route to a school. Therefore, unlike the hump back bridge at Primrose Lane, the same conflicts between pedestrian and vehicular movements do not arise.

Swing Bridge at Dockfield Road, Shipley - The northern approach to this bridge is straight and level although the southern approach is off a bend. Notwithstanding this intervisibility between drivers of on-coming vehicles is still good. Some pedestrian facilities also exist on the bridge in the form of narrow 'footway' and the bridge is not on direct route to a school. Therefore, unlike the hump back bridge at Primrose Lane, the same conflicts between pedestrian and vehicular movements do not arise.

Swing Bridge at Micklethwaite Lane (Sty Lane) - The approaches to this bridge are straight although the roads are at a gradient. Intervisibility between drivers of on-coming vehicles at the bridge is good. The area to the north of the bridge is lightly developed and therefore pedestrian movements across the bridge are low.

A planning application for up to 440 dwellings on land north of the bridge has been considered by Highways a new swing bridge, with full pedestrian facilities, as well as a separate pedestrian bridge over the canal to the south are to be delivered as part of the development. Therefore, unlike the hump back bridge at Primrose Lane, the same conflicts between pedestrian and vehicular movements do not arise.

Bridge at Swine Lane (near Dob Lane) - The approaches to this bridge are on a bend however it is signalled to control traffic movements and also has a separate pedestrian bridge running along the western side. Therefore, unlike the hump back bridge at Primrose Lane, the same conflicts between pedestrian and vehicular movements do not exist.

TRANSPORT ASSESSMENT ADDENDUM No 1 923C / April 2017 - In addition to a Transport Assessment the applicant has now a Transport Assessment Addendum No 1, dated April 2017. Having reviewed this document I would comment as follows. I do not accept the reasoning behind the distribution of the site traffic during the AM and PM peaks and the cumulative impact derived from these.

The Council's Highway Development Control response, dated 09 March 2017, raised concerns about the potential for further conflicts between pedestrian and vehicles due to an increase in vehicular movements over the bridge as a result of this development.

It is my view that in the AM peak the higher proportion of the estimated 44 trips generated by the development would be heading north over the bridge and not south from Gilstead Lane as shown in the addendum document.

Site traffic is more likely to arrive from the south along Bradford Road then Wagon Lane and Primrose Lane. Similarly in the PM peak a higher proportion of site traffic is likely to leave travelling south along Primrose Lane and over the bridge towards Bradford Road. Therefore the percentages shown in the addendum document for the movement of traffic to and from the site should actually be reversed for example:

- AM Peak - approximately 70% heading north over the bridge and 30% heading south from Gilstead Lane.
- PM Peak - approximately 70% heading south over the bridge and 30% heading north towards Gilstead Lane.

Then if these percentages are applied to the data supplied in the Transport Assessment and addendum document submitted by the applicant this would result in the following vehicular movements to & from the development site:

- AM Peak Arrivals - 26 vehicles heading north over the bridge and 11 heading south from Gilstead Lane.
- PM Peak Departures - 21 vehicles heading south over the bridge and 9 heading north towards Gilstead Lane.

The above would result in an increase of 6% in the overall traffic movements over the bridge in the AM peak and 5.4% in the PM peak.

A more accurate comparison would have been traffic movements to and from an existing employment site in the area i.e. people travelling to work in Gilstead and not just looking at general traffic movements on Primrose Lane.

The following is taken from the addendum document

"TD 41 / 95 'Geometric Standards for Direct Access' within Design Manual for Roads and Bridges states "Any application which results in a material increase in the volume of traffic or a material change in the type of traffic entering or leaving the trunk road shall be carefully considered. Generally, a material increase is considered to be if the turning traffic flows, as a result of the new development would increase by 5% or more".

Therefore according to the applicant's own reasoning the proposed development would result in a material increase in the levels of traffic crossing the bridge and given the lack of segregated pedestrian crossing facilities this would not be acceptable and my reasons for not supporting this proposal still stand.

Historic England

The application site lies within the buffer zone to the Saltaire World Heritage Site (SWHS) and is identified as contributing positively to the setting of SWHS in the Saltaire Environmental Capacity Study published in 2006. The site also has a historic functional link with Saltaire village having been the home of Titus Salt Junior. The nineteenth-century farmhouse, the associated outbuildings and the surviving historic parkland around the complex are undesignated heritage assets of local significance.

In order to be designated as a World Heritage Site, Saltaire's Outstanding Universal Value (OUV) is clearly set out and tied to UNESCO criteria. Although Saltaire Village is of the highest degree of significance, as defined in the Glossary of the *National Planning Policy Framework*, the idea of significance as set out in the NPPF is not the same as OUV. Significance is a wider appreciation of a range of heritage values associated with the site.

Saltaire Village is of OUV as an outstanding example of a mid-nineteenth-century industrial model village. Its importance arises from the way in which the village represents Titus Salt's philanthropic intentions, town planning and social welfare ideas, as well as for the extremely high quality of the architecture of the village's built form.

We wish to highlight the following sections of the *Statement of Outstanding Universal Value* for Saltaire:

"Beyond the (World Heritage) site's boundaries, development has surrounded the property to the east, south and west for the last century, with the remnant River Aire to the north."

"The original rural river valley setting has gradually disappeared over the last hundred years but significant views remain. Given that part of Salt's original intention was to locate Saltaire in a healthy environment, the buffer zone is important in this respect."

Titus Salt's vision was to give his workers somewhere to live and work which was removed from the unsatisfactory conditions of the industrial cities of the nineteenth century.

The valley location with rural views beyond was a key part of achieving this vision, as well as providing him with the raw materials and transport connections needed to operate his successful mill.

The rural and open character of the application site contributes to understanding Salt's original vision. This justifies the site's inclusion within the SWHS buffer zone. The site and surrounding area is identified as an 'important' rural backdrop in figure 9 of the *SWHS Management Plan 2014*.

As mentioned above, the significance of the site and its contribution to the significance of the SWHS is a wider consideration. In terms of the current application and its impact

on the WHS the most relevant aspects of the significance are the historic association with Titus Salt Junior and the farm use which provides continuity with the operation of the wider landscape in Salt's day.

The group of buildings at Milner Field Farm are of strong local interest and contribute to understanding the significance of the Salt family and the wider context of Saltaire.

We therefore welcome the retention of a greater proportion of the existing farm buildings within the amended scheme. The proposed development will not extend the amount of built form on the site in terms of footprint, and will result in a minor increase in scale. This will largely retain the open and rural character of the site and its surroundings, thus minimising the impact on this important aspect of the OUV of Saltaire.

The car park will have a more negative impact on this character and we have previously highlighted our concerns about this aspect of the scheme. The recently submitted drawing showing the car park layout gives a better understanding of the impact. The design attempts to mitigate the visual impact through an organic form to the parking spaces, broken up by areas of grass and trees/ shrubs. You should be satisfied that these measures will prevent the car park being dominant within key views towards Saltaire as identified in the management plan. The plan appears to show that the only lighting to be provided will be low-level within bollards. This should be clarified. High level street lighting or flood lighting would have a harmful impact on the rural character of the area, which is an important contributor to the OUV of Saltaire and would increase the visual impact of the development, particularly in winter.

The change of use of the site and demolition of some of the existing buildings will have an impact on the significance of the site as an undesignated heritage asset. This impact should be assessed in accordance with paragraph 135 of the National Planning Policy Framework. We defer to the expertise of your authority's Conservation Officer for advice on the level of this impact and its consideration in terms of local and national planning policy.

We consider the proposed development would have a negligible impact on the rural backdrop provided by the Saltaire World Heritage Site buffer zone, an aspect of the setting of the village which contributes to our appreciation of its Outstanding Universal Value.

Paragraph 137 and 138 of the *NPPF* concern the assessment of proposals for development which have the potential to affect the significance of World Heritage Sites. Further guidance is provided in paragraphs 28-38 of the *National Planning Practice Guidance*.

Setting is not a purely visual consideration. The site's current agricultural use provides a link back to its inception by Titus Salt Junior, and aids an understanding of the operation of the wider landscape in connection with the village in the nineteenth century.

The change of use will therefore harm the contribution the site makes to the historic value of Saltaire to a limited extent. In terms of the overall significance of the WHS, we consider this would have a minor harmful impact. This harm should have a

‘clear and convincing justification’ and be weighed against the public benefits of the scheme (paragraphs 132 and 134, NPPF). Paragraph 137 also requires local planning authorities to look for opportunities for development to enhance or better reveal the significance of heritage assets. Such an opportunity is mentioned on page 27 of the Heritage Impact Statement produced by AHP. If your authority is minded to grant consent for the development we recommend you consider appropriate mechanisms to secure these enhancements.

Recommendation

We would urge you to address the above issues and recommend the application should be determined in accordance with national and local policy guidance and on the basis of your specialist conservation advice.

Landscape Design

The site lies within the green belt of the Airedale Landscape Character Area (see CBMDC SPD LDF: Landscape Character Supplementary Planning Document, Volume 1: Airedale) and the Landscape Type is “wooded incline”. Relevant RUDP policies GB1, NE3 and NE3A apply.

- The overall description in the above SPD of the “wooded incline” states that.....”The wooded incline covers substantial areas of Airedale, located on the steeper valley slopes. There are five large areas of wooded incline which are prominent due to the valley landform and views afforded from across the valley. They often contain a mixture of woodland with associated pasture – in fact, many of these areas are not densely wooded but may also include large areas of sparse or dense scrub. Some of the woodland and associated habitats are of good ecological value. The wooded areas generally spread up the hillside from the valley bottom and rarely extend over the top of the slope. The specific areas of wooded incline in Airedale are (1) the areas including Curre Wood and Hawkcliffe Wood to the south of Steeton; (2) Spring Crag, Alder Wood and Low Wood on the north side of the Leeds-Liverpool Canal between Silsden and Riddlesden; (3) the hillside around Marley Hall, between Thwaites/Parkwood, Keighley and Myrtle Park at Bingley; (4) Walker Wood/Midgeley Wood, Hirst Wood and Milnerfields below Shipley Glen; and a smaller area (5) Bankfield Hotel/Nab Wood on either side of the A650 at Cottlingley Bar.” The visual prominence and enclosure of the “wooded incline” is described as prominent and open.....”The large blocks of woodland are visible from the valley floor and across the valley from many viewpoints.
- Although the wooded areas could appear contained from within, the broad shape of the Aire Valley gives a sense of openness rather than enclosure.” The historic continuity of the “wooded incline” is described as high.....”Although settlement has encroached into the edges of the wooded incline, there has been a continuity of woodland/pasture incline within the Aire Valley for over a century.”
- The landscape analysis of the “wooded incline” generally is that it has a moderate strength of character.....”Seemingly dense areas of woodland contribute to the character of the Aire Valley but have been weakened by the encroachment of settlement. Views of urban areas are dominant from many locations.”, the condition is described as declining.....”Substantial areas of woodland are being fragmented by the encroachment of piecemeal development, recreational pressure and the lack of or inappropriate management.” The overall landscape strategy guidelines are to “conserve and enhance” the “wooded incline”.....”Conserve the wooded nature of the incline

by resisting any proposals which would reduce the area of woodland or scrub or fragment the overall cohesiveness of the landscape unit, and especially where this would occur on the upper edges of the wooded incline.”.....”Conserve and protect the woodlands which have the greatest ecological value; ensure good management and encourage regeneration of semi-natural habitats by removing ‘naturalised non-native’ species. Manage the scrub habitat around the woodland edges to increase visual interest and habitat value.”.....”Enhance the existing woodland cover by additional tree planting, where appropriate and especially where development has encroached, resulting in an adverse impact upon the landscape. Concentrate new woodland planting in areas where this will have the greatest visual impact.”.....”Protect the universal value of the Saltaire World Heritage Site and minimise the negative impact of development within the Buffer Zone on the World Heritage Site.”

- The policy guidelines regarding the potential for development within the “wooded incline” state that.....”With moderate strength of character, high historic continuity and a prominent, open character the wooded incline is sensitive to change.”.....”The wooded character is an important element of Airedale but pressure for suburban development is beginning to erode that value, for example, on prominent slopes at Thwaites/Long Lee. Settlement is encroaching up the slopes from the valley bottom and it is important that these substantial woodland blocks are strengthened to mitigate the impact that recent developments have had on the Aire Valley. One of the features of Airedale, in general, is the equal proportions of woodland, pasture and settlement and this balance must be maintained in order to retain the character of the area.”.....”Should further development be required, small scale schemes of traditional detached housing or small hotel/office developments absorbed within a well wooded framework, to balance the landscape, would be most appropriate and could strengthen the current weaker edges where settlement has begun to intrude upon the skyline. Large scale suburban housing estates would be difficult to absorb into a wooded landscape and should not be considered on the upper slopes. Development of the pastures within the wooded incline are not appropriate as the open grassland and scrub elements form an important part of the landscape unit.”
- Any proposals within the Airedale Landscape Character Area “wooded incline” should therefore look to conserving and enhancing the landscape character of the area and any potential future development should consequently be sympathetic to this character. It would appear that none of the submitted information or documents pays any reference to the above mentioned CBMDC SPD LDF: Landscape Character SPD Volume 1: Airedale, or to RUDP policies NE3 and NE3A. Policy NE3 states that.....”Within the Landscape Character Areas as indicated below and shown on the Proposals Map, development will be permitted if it does not adversely affect the particular character of the landscape: Airedale, Thornton and Queensbury, Esholt, Tong Valley, Pennine Upland, Wisden, Rombalds Ridge, Wharfedale, South Bradford, Worth and North Beck Valley.”, Policy NE3A states that.....”Within the Landscape Character Areas identified in policy NE3, development likely to affect the landscape will be assessed having regard to the extent to which it would: cause unacceptable visual intrusion; introduce or remove incongruous landscape elements; cause the disturbance or loss of or help to maintain: (1) Landscape elements that contribute to local distinctiveness; (2) Historic elements which contribute

significantly to landscape character and quality, such as field, settlement or road patterns and landform; (3) Semi-natural vegetation which is characteristic of that landscape type; (4) The visual condition of landscape elements.” We believe that the proposed development applications do not take the above mentioned CBMDC Landscape Character SPD Volume 1: Airedale, or RUDP policies NE3 and NE3A into consideration and we believe that they do not accord with any of these.

- Regarding RUDP policies NE3 and NE3A – Policy NE3 states that.....**“Within the landscape character areas, as indicated below and shown on the proposals map, development will be permitted if it does not adversely affect the particular character of the landscape: Airedale, Thornton and Queensbury, Esholt, Tong Valley, Pennine Upland, Wilsden, Rombalds Ridge, Wharfedale, South Bradford, Worth and North Beck Valley.”** Policy NE3A states that.....**“Within the Landscape Character Areas identified in policy NE3, development likely to affect the landscape will be assessed having regard to the extent to which it would: cause unacceptable visual intrusion; introduce or remove incongruous landscape elements; cause the disturbance or loss of or help to maintain: (1) Landscape elements that contribute to local distinctiveness; (2) Historic elements which contribute significantly to landscape character and quality, such as field, settlement or road patterns and landform; (3) Semi-natural vegetation which is characteristic of that landscape type; (4) The visual condition of landscape elements.”** We believe that the proposed development applications do not accord with the above policies due to the following reasons: (a) the proposals for a car park within the historic landscape setting which we believe would adversely affect the distinctive existing landscape character of the area and the important historic landscape setting of the Milner Field Farm, (b) the proposals for considerable additional tree planting around the farm buildings and around the proposed car park which we believe would be detrimental to the unique historic parkland landscape character of the area.
- In addition to our previous comments from 3/10/16 we believe that the proposals to erect deer fencing around the entire site (as stated in the proposed Ecological Management Plan) do not comply with RUDP policies NE3 and NE3A and would adversely affect the distinctive existing landscape character of the area and the important historic landscape setting of the Milner Field Farm and House.

Natural England

This application is in close proximity to Trench Meadows Site of Special Scientific Interest (SSSI). Natural England considers that there is currently not sufficient information to determine whether the proposal will have a significant impact on the interest features for which the site has been designated. We advise that the following additional information should be provided:

- Further information should be provided on the proposed species to be introduced to the site and their provenance, including proposed wetland species and the assemblage to be used on the green roof. The close proximity of the site increases the likelihood of any inappropriate species spreading from the application site to the SSSI, where such species could adversely impact the its interest features. In particular, the origin of any species which are very rare and vulnerable on the SSSI, such as herb-paris Paris quadrifolia and early purple orchid Orchis mascula, would need to be carefully selected.
- Information is required on the ongoing management of the site, including

whether any pesticide or fertiliser use is proposed and what biosecurity measures are to be put in place to prevent non-native invasive species or pathogens being brought on to the site. This should be informed by details of the current condition of the land and sward composition, including soil samples to determine the phosphorus index of the soil. As the land has been dairy pasture to date it is likely that the soil will have high nutrient levels which may preclude the establishment of a species-rich sward. If less desirable species i.e. competitive grasses or forbs such as white clover or injurious weed species take hold, this may impact on the plant community within the SSSI. Control management would therefore be required if the proposed wood meadow habitat fails to establish.

- Details should be provided on the proposed sustainable drainage scheme, including information on water sources, management of water quality, maintenance of swales to prevent build-up of pollutants in the soil, and any other pollution prevention measures proposed. There are several flushes within the SSSI, which are notified features of the site and which drain into the watercourse running along the shared boundary with the application site.
- The proposal indicates that a deer fence will be erected around the whole site (30ha). This would reduce the ecological connectivity of the area, including the SSSI, and would reduce the feeding habitat available for large mammals, increasing such pressure in the surrounding area. We would wish to see evidence that a deer fence is required and consideration of its impact on ecological connectivity with the SSSI.
- Information should be provided on what mitigation measures should be put in place to prevent any impact of herbicide treatment on the SSSI i.e. what size of buffer adjacent to the SSSI will be used (this will depend on application method / machinery used).

Should the application change, or if the applicant submits further information relating to the impact of this proposal on the SSSI aimed at reducing the damage likely to be caused, Natural England will be happy to consider it, and amend our position as appropriate.

If your Authority is minded to grant consent for this application contrary to the advice relating to the Trench Meadows SSSI contained in this letter, we refer you to Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended), specifically the duty placed upon your Authority, requiring that your Authority;

- Provide notice to Natural England of the permission, and of its terms, the notice to include a statement of how (if at all) your authority has taken account of Natural England's advice, and
- Shall not grant a permission which would allow the operations to start before the end of a period of 21 days beginning with the date of that notice.

Trees Team

- There is an adverse arboricultural impact with the application but this could be, in my opinion, overcome by the proposed landscaping/tree planting – particularly a comprehensive tree planting plan should be conditioned.
- If approving please condition (subject to landscape dept) tree planting which could be TPOd to ensure long term retention.

Victorian Society

We welcome retention of the C19 farm buildings and the careful removal of C20 structures which detract from them. As our first obligation is to the buildings and their future, we support conservation and conversion of the C19 buildings.

The Society's principal interest and concern in this application is in the secure future which the scheme offers for this interesting group of Victorian model farm buildings, in a scheme which will afford them both preservation and long-term use. On architectural grounds the scheme is supported.

The legacy of the Salt family's development and occupation of the site, including the now demolished house "Milner Field", its pleasure gardens, lodges and model farm, is set out in the application documents. Harm to this legacy which might be caused by the cessation of continued historic use of the farm, should this application be approved, could to an extent be mitigated by the applicant's suggestion for the restoration of the pleasure gardens on the demolished house, the marking of the house's footprint and for enabling public access to them. The Society supports this suggestion.

World Heritage Site Officer

1. Description of the Heritage Asset

The development site – Milner Field Farm and land - contributes to our understanding of Attribute 4 of the Outstanding Universal Value (OUV) of Saltaire World Heritage Site. Put another way, Attribute 4 is an individual attribute which *conveys* the OUV of the World Heritage Site (WHS). Attribute 4 describes the landscape context for Saltaire and references 'intangible cultural heritage (ICH) attributes and associations' (ICOMOS 2011 *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* and see point 4 below). ICH in this context can be summarised as the intimate historical and associative links between this Model Farm and its land, Titus Salt, his family especially Salt Jn and Saltaire (these associations are described more fully in Cattell 2016) and the light that these associations shed on our understanding and appreciation of the cultural heritage asset of Saltaire.

In addition, the significance of locating Saltaire in the Aire Valley is mentioned in the UNESCO inscription statements of Integrity, Authenticity and Protection and Management Requirements (UNESCO Inscription 1028, 2001) as follows.

Integrity Statement: "...*Beyond the site's boundaries, development has surrounded the property to the east, south and west for the last century, with the remnant Aire river landscape to the north...*"

Authenticity Statement: "...*The original rural river valley setting has gradually disappeared over the last one hundred years but significant views remain. Given that part of Salt's original intention was to locate Saltaire in a healthy environment, the buffer zone is important in this respect...*"

Protection and Management Statement: "...*There is a need to ensure that development in the buffer zone respects the surviving landscape setting of the property...*"

The point being made in these Inscription Statements is that Saltaire's influence on the Garden City Movement in part stems from its deliberate (planned) juxtaposition with rural landscape. This juxtaposition helps us to understand the Victorian philanthropic paternalism for which Saltaire is inscribed. People working in Salts Mill could, almost uniquely at the time, have easy access to fresh air, woodland and farmed countryside (and Milner Field Farm is one of the last remaining elements of this historic farmed countryside setting).

2. Description of the harm

- a. The development will make it impossible to 'present' or 'transmit' this aspect of OUV to future generations and this threatens the ability of the Management Committee for Saltaire WHS (ie Bradford Council) to adhere to Article 4 of the World Heritage Convention (*Recommendation concerning the Protection at National Level, of the Cultural and Natural Heritage*, General Conference of the United Nations Educational, Scientific and Cultural Organization 1972)

Article 4 World Heritage Convention states that (author's emphasis):

*"...Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, **presentation and transmission** to future generations of the cultural and natural heritage referred to in Articles 1 and 2 (ie. World Heritage Sites) and situated on its territory, belongs primarily to **that State. It will do all it can to this end**, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain..."*

Although this application does not harm part of the WHS in a physical way (for example by demolition of key buildings), it is a *duty* of this State (ie the UK and thereby this Authority), to ensure that the OUV of this World Heritage Site can be *presented and transmitted to future generations*. This proposed development in the Buffer Zone has a range of uncertainties and harmful elements that puts at risk the Authority's duty under the Article 4. This development, if approved, may necessitate a review of the Statements of Authenticity, Integrity and Management within the UNESCO inscription to ensure they were still reflective of the site's values and attributes.

- b. Development on the Milner Field Model Farm will alter the setting of the WHS and destroy intangible cultural heritage (ICH) associations. The development of office buildings with attendant increases in traffic flows, car parking for 100 cars, site lighting and artificial landscaping will alter the appearance of the Farm. The Farm's land will stop being farmed and it will look different and its historic character will be changed, in essence, forever. The application has not provided sufficient comfort that these elements of the development will not cause harm.
- c. Harm to Designated Views. It is acknowledged that the applicant has improved the application in this regard – roofscapes, parking design, tree screening have been partly amended (although it is not clear how the reference to 'extensive tree planting' to provide visual screens in the revised Landscape Management Plan (Ecological Report Appendix by Brookes' - section 4.2) relates to the

original proposed planting around the proposed Innovation Centre. This may not be ideal given the designed nature of the landscape in this area).

There are still issues which will cause harm to Designated Views. There is no detailed Lighting Plan, there are 100 parked cars and the passage of cars are all still harmful issues for the Designated Views compared to the minimal traffic movements of a dairy farm. Visualisations of 'how the View might appear' once development has taken place are, inevitably, static and cannot be fully relied upon.

- d. The harm caused by this development to the OUV of Saltaire WHS is irreversible and substantial. Irreversible, because functionally it has changed and so the ability for it to convey the 'intangible cultural heritage (ICH) associations' (described above) will be impossible. The development site's contribution to OUV will become considerably less evident and consequently much more difficult to present to future generations . Once the farm is gone and its land is altered it seems unlikely that re-instatement could happen should the development fail. The landscape would stop being managed and become derelict. As an 'important rural setting' for the WHS (World Heritage Site Management Plan Appendix 7) erosion of that setting must be very carefully considered and mitigated with significant public benefits. The application has not set out these significant benefits.
3. Assessment of the application's proposed 'public benefits' and whether these mitigate the substantial harm.
 - a) The farmland will be subject to a Landscape Management Plan and a revised document has been submitted in Feb 2017.

This document's objective is to develop a strategy to maximise the potential of the site for wildlife and as an educational resource. Whilst commendable in itself, this does not mitigate or provide sufficient public benefit to justify the *substantial harm* caused by the loss of a Model Farm with close associations with the World Heritage Site. The NPPF para133 states:

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *the nature of the heritage asset prevents all reasonable uses of the site*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible*
- *the harm or loss is outweighed by the benefit of bringing the site back into use*

This development proposal does not demonstrate that there are *substantial* public benefits accruing from it that outweigh this level of substantial harm.

- There is no clear Business Plan presented for the Innovation Centre which demonstrates sustainability and actual economic success projections,
- the Interpretation Plan is sketchy and does not actually include reference to the Model Farm or the landscape (see further detailed comments below 3.c), instead it focusses on the House remains.
- the landscape objectives proposed have no costing to evidence their sustainability,
- the public access arrangements for the land are vague (see below 3.b comments on the revised Design and Access Statement)
- there is no link to Bradford Council's Supplementary Planning Document (SPD) NE3 and NE3a Landscape Character Assessment for Airedale in terms of justifying the planting regime.
- The revised Landscape Management Plan refers to 2 no. Interpretation Boards 'placed at strategic locations' and some leaflets as the primary way that the educational potential of the land for education could be harnessed. The location of the Interpretation Panels is not marked on any plans.

The heritage asset (the Model Farm and it's landscape links to the World Heritage Site) is still in viable use as an operating Farm, as it has been for over 100 years.

The actual hectares to be managed in this way is unclear. Figure 3 in Brookes's Ecological Appendix to the revised Management Plan indicates Areas A, B and C. However only one of these areas is labelled as 30ha when elsewhere in the report there is reference to the *total* area being managed as 30ha. The construction of a deer fence (presumably a high and substantial structure) potentially enclosing land does not appear to be marked on any plans and would need to be assessed if it met requirements of SPD NE3 etc.

b) Revised Design and Access Statement

This document proposes that there are public benefits arising from increased public access to and educational engagement with the land.

Page 6. Refers to "arranged" public access – this does not sound like an improvement on the current situation and in fact there are existing public footpaths on the land. The red line marked on the revised Location Plan has been altered. It would appear that the whole path from South Lodge to Milner Field House remains are not included in the planning application – however a prime mitigation offered to address harm caused by this development is that access to the House remains are improved. This would appear to be an inconsistency which needs explanation. Furthermore, the blue and green lines marked for footpaths are not described as upgraded or improved (only the purple boundary – entrance from Primrose Lane). Again this would appear to be inconsistent based on the objectives in the D&A Statement to mitigate harm and improve access to the remains and the land generally. No account of S/BH17.1 or landscape designations is made in this part of the application.

Schools already informally visit the Milner Field House remains and education work is based on these visits. The D&A Statement suggests that this sort of activity would be initiated by the land owner thus creating public benefit, however it is happening already without intervention. There is no new public access suggested. How would access be 'arranged'? Would it be confined to certain days of the year or month (this detail is not stated and is a presumption on the part of the author).

Page 8. "the limited access times shall be agreed with the local authority" – in perpetuity? Is it realistic to assume the Local Authority's role in this?

The revised D&A Statement, given that it is a pivotal document, lacks detail with regard to the land.

Taken together, these proposals do not fulfil para 133 of the NPPF nor do they "enhance or better reveal" the heritage assets (NPPF para 137).

- c) 'Interpretation Plan' – drawing SK 035 Rev A Proposed Plan of Historic Site at Milner Field

The applicant has referred to his willingness to implement interpretation and improved access at the remains of the Milner Field House. The applicant's proposal to do this was used by Historic England as offering *potential* mitigation for the harm caused by the application.

Further details of the interpretation and improved access presented informally by the applicant were examined by the World Heritage Site Officer in July 2016. These proposals in the current revised application in February 2017 are unchanged from the July 2016 version.

They are in essence superficial, limited to sign boards (2no), benches (5no) and 'upgrading' tracks and 'clearing' woodland. The proposals in their existing form do not follow best practice for heritage interpretation or the archaeological conservation of the house footings and other associated underground structures. The long term management of such changes is unknown as there is no mention of a maintenance plan for these items. There is no specific account taken within the interpretation proposals of the harm they are supposed to be mitigating or to RUDP landscape and other designations (BH 17) of the area. The interpretation appears to be primarily about the Milner Field House remains and not explicitly about the Model Farm and the land which is subject to the planning applications and the harm being caused by the development. The interpretation proposals certainly do not provide sufficient mitigation for the substantial harm caused by this development. Detailed comments on this element are attached at Appendix 1.

4. Other heritage comments

The applicant has not conducted a Heritage Impact Assessment (HIA) based upon the ICOMOS guidance (*op. cit*) in 2016 and there is no such document presented as part of the revised application in 2017. A HIA using the ICOMOS guidance is the most thorough way to analyse whether and how OUV is impacted by the development. There are two "impact assessments" submitted

with this application – by the Architectural History Practice March 2016 and by Wardell Armstrong April 2016. In the latter document page 31 Wardell Armstrong have not analysed OUV and in fact have mistaken it for being confined to “critical views”. The Architectural History Practice make no mention of OUV in their impact assessment and use a methodology from the *Design Manual for Roads and Bridges*. Whilst Bradford Council do not *require* an ICOMOS HIA of all applicants, many larger schemes within this sensitive heritage area do present them and they are considered the industry sector ‘gold standard’ for larger schemes in WHS. Previous public comments from the WHSO have highlighted issues related to assessment of significance and of impact.

To summarise the position of the WHSO, and to reiterate them quoting the *Guidance* from ICOMOS:

- a. the significance of Saltaire WHS and individual Attributes of OUV should be graded as ‘Very High’. This is also a historic landscape, albeit undesignated at this time (ICOMOS *Guidance* 2011 page 20) and an ICH.
- b. The impact grading of this type of development should be classed as ‘Major’.

5. Conclusion.

RUDP S/BH14 states that “development which would adversely affect the setting or views into or out of the WHS will not be permitted”. This application adversely affects the setting and views (setting is an important component of the OUV of Saltaire WHS) of the WHS and also the undesignated landscape of Milner Field House and as such this application does not accord with RUDP S/BH14 or S/BH 17.1.

This application would cause **substantial harm** to the OUV of the Saltaire World Heritage Site for the reasons described above and harm is caused to the Designated Views. The application causes harm to undesignated heritage assets and their setting (see previous comments May 2016). This development would therefore be contrary to NPPF paras 132, 133, 135 and 137 and 138. Concrete evidence of *sufficient* public benefits is not forthcoming, proposed mitigation measures are not sufficiently proportionate to the level of harm caused and there is no clear and convincing case for the substantial harm to an asset of the highest significance ie. Saltaire World Heritage Site. This application should be refused.

Yorkshire Gardens Trust

The Yorkshire Gardens Trust (YGT) is a member of the Gardens Trust; the statutory consultee for historic parks and gardens. The Gardens Trust supports the County Gardens Trusts in the protection and conservation of designed landscapes.

In response to these further amended plans we wish to make the following comments.

We still note with extreme concern that this further revised application shows no improvement in the understanding of Robert Marnock’s work at Milner Field, despite his being one of the greatest nineteenth century landscape designers.

The design of the new extensive tree and shrub planting scheme shown in the Landscape Strategy Plan, DRAWING NO 2513/9 REVISION D, is again completely unlike Marnock's original design, and if implemented would totally destroy over 50% of Milner Field's historic parkland within its designed landscape garden, together with nearly all its historic meadowland, and thus cause severe harm to Milner Field's designed historic landscape.

This further revised plan would also result in severe harm to this landscape garden's pastoral setting, both to the north and south of the Carriage Road on approach to the East Lodge. This is due to the proposal for new woodland on the whole of Beck Side Close pasture and on the majority of Holme Close pasture. This pastoral setting is a key component of the Marnock design and the retention of Beck Side Close and Holme Close as meadows is essential in order to retain the initial section of the intended dramatic approach to the site of Mansion, through an avenue of horse chestnut trees flanking these meadows.

Views

In detail, views under threat include:

- a) the principal views across the Park to the SE from the mansion site and its terraced gardens
- b) the designed views from the carriage drive across the parkland
- c) the view from the mansion site to the model farm

These threats emanate from:

- a) belts of newly proposed extensive woodland totally covering:
 - i) the meadows west of the model farm including Cow Pasture, the southern section of the Park, the Far Park, and the majority of Holme Close
 - ii) the meadows, Stubbing Close and Beck Side Close, north of the Carriage Drive/Road
- b) the proposed planting of a formal avenue of trees between the model farm and the mansion to replace the original informal planting of trees and shrubs.

The Parkland

Historic England considers historic parks to be "an integral part of the English Countryside, making a unique contribution to its character, its biodiversity and cultural heritage." Parkland is also a recognised priority habitat and the need for grazing animals in order to generate invertebrate and fungal diversity resulting from deposits of their dung, is well-understood.

Historic England recognises that "the principle of parkland conservation is to protect and retain the original historic fabric where possible" and "to accurately repair where needed". However these new proposals completely fail to meet these criteria since over 50% of the parkland would be lost to new woodland and all grazing of any retained grassland would cease.

Water Management

The proposed restoration of wetland habitat is confined to a small section of Little Beck south-east of the site of the Fishing Lake, yet the principal water feature of the Marnock designed landscape was the Fishing Lake immediately upstream. In our view restoration of the, at present, derelict Fishing Lake should be an integral component of any restoration programme for this historic landscape. The Fishing Lake is also

important historically as it reflects one of the few leisure pursuits of Titus Salt Junior - his building a trout hatchery at Milner Field to stock in particular this lake.

Conclusion

As the applicant has failed to demonstrate that this further revised application would not result in the loss of features which form an integral part of the special character of this Robert Marnock designed historic landscape, and also failed to demonstrate that it would not detract from the enjoyment, lay out, design character or appearance, we consider this proposal to be contrary to Policy BH17.

In conclusion, on the grounds of the specific reasons outlined above and our previous comments, the Yorkshire Gardens Trust strongly objects to this planning application.

Yorkshire Water

Please note this letter supersedes previous correspondence dated 7th December 2015 and reflects the amended site layout and associated changes. Note my comments regarding protection of public water supply and public sewerage infrastructure.

If planning permission is to be granted, the following conditions should be attached in order to protect the local aquatic environment and YW infrastructure:

Unless otherwise agreed in writing by the Local Planning Authority, no obstruction including trees and landscape features shall be located over or within a minimum 6 metres either side of the centre lines of the water mains, i.e. a minimum protected strip width of 12 metres per pipe, that are laid within the site boundary. If the required stand-off distance is to be achieved via diversion or closure of the sewer, the developer shall submit evidence to the Local Planning Authority that the diversion or closure has been agreed with the relevant statutory water undertaker

(In order to allow sufficient access for maintenance and repair work at all times)

Unless otherwise agreed in writing by the Local Planning Authority, no obstruction including trees shall be located over or within 5 metres either side of the centre lines of the 300mm and 375mm diameter sewers, i.e. protected strip widths of 10 metres per pipe, that are laid within the site boundary. If the required stand-off distance is to be achieved via diversion or closure of the sewer, the developer shall submit evidence to the Local Planning Authority that the diversion or closure has been agreed with the relevant statutory sewerage undertaker.

(In order to allow sufficient access for maintenance and repair work at all times)

The site shall be developed with separate systems of drainage for foul and surface water on and off site.

(In the interest of satisfactory and sustainable drainage)

No piped discharge of surface water from the application site shall take place until works to provide a satisfactory outfall, other than the local public sewerage, for surface water have been completed in accordance with details submitted to and approved by the Local Planning Authority.

(In order to prevent flooding and in accordance with sustainable drainage principles)

No development shall take place until details of the proposed means of disposal of foul water drainage for the whole site, including details of any balancing works, off-site works and phasing of the necessary infrastructure, have been submitted to and approved by the local planning authority. A pumped foul water connection shall not exceed four litres a second.

Furthermore, unless otherwise approved in writing by the local planning authority, no buildings shall be occupied or brought into use prior to completion of the approved foul drainage works.

(To ensure that no foul water discharges take place until proper provision has been made for their disposal)

The following information is relevant to the conditions listed above:-

There are several strategic treated water mains laid within the site boundary including a large diameter (30") pipe that forms a section of the Barden aqueduct.

The pipes are essential to maintaining the public water supply to Bradford and beyond and it essential that they are protected. It appears from the submitted landscape drawings that the wooded areas will be partially located over the pipelines. This is NOT acceptable and given this is an application for full planning permission, the relevant drawings and associated landscape documents must be amended prior to determination and Yorkshire Water re-consulted. The pipes have some protection via deeds of easement but the exact lines of the infrastructure should be determined via site survey. Given the size and strategic importance of these pipes, it is unlikely that they could be diverted.

1) On the Statutory Sewer Map, there are 150mm diameter public foul, 225mm diameter public combined, 300mm diameter public combined and 375mm diameter public combined sewers recorded to cross the site. It is essential that the presence of this infrastructure is taken into account in the design of the scheme. A stand-off distance of 3 (three) metres is required at each side of the 300mm & 375mm diameter public combined sewer centre-lines. It appears that the 375mm sewer is in an area proposed for woodland planting which is not acceptable. Given this is an application for full planning permission, the relevant drawings and associated landscape documents must be amended prior to determination and Yorkshire Water re-consulted. Trees must not be planted 5m either side of the public sewer centre-line(s).

There is also a 150mm diameter public foul sewer laid within the track linking Higher Coach Road with Primrose Lane. It is essential that the pipe is protected during development, for example if a road is to be laid along this path. The developer should note that this pipe has the benefit of a protective easement.

2) The local public sewer network does NOT have capacity available to accept any discharge of surface water from the proposal. The developer appears to have amended the original proposals for drainage of surface water and is now suggesting a "hybrid" solution utilising soakaway / SUDS / public sewer on the amended application form. We had understood from the documents originally submitted with this application that surface water would discharge to watercourse and it is not clear why this solution has changed. If infiltration or other SUDS are not viable, the developer is advised to contact the Environment Agency/local Land Drainage Authority with a view to establishing a suitable watercourse (there are several nearby) for the outfall as was previously proposed.

3) Foul water domestic waste should discharge to the 375 mm diameter public combined water sewer recorded in Primrose Lane, at a point adjacent to the site entrance. If the site, or part of it, will not drain by gravity, then it is likely that a sewage pumping station will be required to facilitate connection to the public sewer network. If

sewage pumping is required, the peak pumped foul water discharge must not exceed 4 (four) litres per second.

Foul water from kitchens and/or food preparation areas of any restaurants and/or canteens etc. must pass through a fat and grease trap of adequate design before any discharge to the public sewer network. Under the provisions of section 111 of the Water Industry Act 1991 it is unlawful to pass into any public sewer (or into any drain or private sewer communicating with the public sewer network) any items likely to cause damage to the public sewer network interfere with the free flow of its contents or affect the treatment and disposal of its contents. Contravention of the provisions of section 111 is a criminal offence.

Summary of Main Issues:

- 1) Proposal
- 2) Green Belt
- 3) Heritage
- 4) Landscape
- 5) Ecology
- 6) Flood Risk & Drainage
- 7) Traffic Impact
- 8) Environmental Impact Assessment
- 9) Community Safety Implications:
- 10) Equality Act 2010, Section 149:

Appraisal:

1) Proposal

1. The proposed development scheme involves the following elements:
 - Demolition of existing single storey agricultural sheds within the central, southern and eastern parts of the main farm building complex, cumulatively amounting to 1,863m² in footprint.
 - Demolition of the slurry storage tank within the south-eastern area of the main farm building complex with a 276m² footprint.
 - Refurbishment and conversion of the existing farmhouse, part of the central agricultural shed and the U-shaped agricultural stabling/ storage building to accommodate offices and meeting rooms, with additionally a socialising area to be incorporated within the converted shed.
 - Construction of a new 160m² single storey laboratory building within the U-shaped courtyard.
 - Construction of a 515m² single storey extension to the agricultural shed to be retained and converted within the central area of the main building complex, to accommodate additional offices and social space.
 - Construction of a 630m² footprint, agricultural style, new 2-storey building within the north-eastern part of the farm building complex to accommodate offices and meeting rooms.
 - Construction of a 270m² footprint single storey dining hall within the part of the site previously occupied by the slurry tank, with an associated external social and seating area.

- Formation of a 100 space car park on approximately 3,000m² of land to the south-west of the existing farm building complex with associated landscaping, service area and bin store.
- Improvement to the site access off Primrose Lane, including the provision of 2 new passing places.
- Implementation of a landscape management strategy in relation to the remainder of the 42 hectare site which would effectively result in the replacement of the grass pasture fields with broadleaved woodland, other than in the field between Milner Field Farm and the ruins of Milner Field House and smaller areas of land to the south of the old coach road which would be subject to an alternative landscaping approach, as follows:
 - Reintroduce the formal avenue of trees that runs southwards from the ruins of Milner Field House towards the copse adjacent to Milner Field Farm.
 - Introduce additional groups of specimen trees as shown on the earlier drawing. These would be set within grassland towards the edges of the open area that lies to the south of the house and other areas alongside the Coach Road.
 - Extend the woodland planting employed elsewhere on site to provide a new definition to the southern boundary of the parkland in visual terms.
 - Retain limited areas of grass to the south and east of the ruins of Milner Field House as well as immediately adjacent to the Coach Road in order to provide an open aspect in these locations.
 - Maintain the open garden areas by employing a conventional regime of management (i.e. regular cutting by landscape contractor).

2) Green Belt

2. Section 9 of the NPPF sets out a national framework for assessing the acceptability of proposals for the development of land within the Green Belt. At paragraphs 89 and 90 the NPPF defines types of development which can be treated as not being inappropriate development within the Green Belt. The stated exceptions to the general policy of Green Belt development restraint include limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. The list also includes the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

3. The NPPF defines previously developed land as land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

4. The proposal site is currently in agricultural use and therefore none of the proposal site comprises previously developed land, as defined by the National Planning Policy Framework. The proposal includes the complete displacement of the current agricultural use of the land with a new use as an innovation centre (sui generis) and therefore the replacement building provision equally cannot apply. Consequently both the proposed change in land use and the proposed new built development on the site must be treated as inappropriate development within the Green Belt.

5. In terms of the provisions of the RUDP, saved policies GB1 and GB4 provide the local policy basis for assessing the appropriateness of proposals for new development and conversions or changes of use within the Green Belt. The proposed development does not meet any of the exceptions stated within saved policy GB1 and includes development beyond the scope of the conversions/ changes of use which could be considered appropriate under saved policy GB4 and therefore the proposal must also be treated as inappropriate development in terms of the local Green Belt policy framework. Inappropriate development should only be approved in very special circumstances.

6. The NPPF confirms at paragraphs 87 and 88 that:

87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

7. It is considered that the proposed development would harm the Green Belt by reason of its inappropriateness, by reason of the harm to the openness of the Green Belt which would be caused by the new buildings and also by the urban encroachment which would be caused by the ancillary infrastructure and landscaping elements of the development, including the bin store, car park and external circulation, seating and social spaces. In accordance with National Policy (paragraph 88 of the Framework) each of those elements of harm attracts substantial weight. A more detailed analysis of that harm is set out below.

8. The proposal site cannot be regarded as previously developed land and the proposal would not retain any buildings in their current agricultural use and therefore all elements of the proposed new buildings must be considered to be inappropriate in the Green Belt irrespective of the fact that the development also involves the demolition of certain existing agricultural buildings and structures of a roughly equivalent footprint and volume. As described in the preceding section the proposed built development comprises:

- Construction of a new 160m² single storey laboratory building within the U-shaped courtyard.

- Construction of a 515m² single storey extension to the agricultural shed to be retained and converted within the central area of the main building complex, to accommodate additional offices and social space.
- Construction of a 630m² footprint, agricultural style, new 2-storey building within the north-eastern part of the farm building complex to accommodate offices and meeting rooms.
- Construction of a 270m² footprint single storey dining hall within the part of the site previously occupied by the slurry tank, with an associated external social and seating area.

9. It is considered that cumulatively the amount of new built development proposed on the site will cause substantial harm to the openness of the green belt. Additionally the proposed development includes a parking area which could be utilised by up to 100 vehicles at any one time. The parking of up to 100 vehicles at the site would also cause significant harm to the openness of the Green Belt over and above any harm that is currently caused by the storage of agricultural equipment and vehicles.

10. In relation to the harm the development would cause to the purposes of including land within the Green Belt, it should be noted that the NPPF sets out these purposes as follows:

- To check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

11. The stated purpose of including land in the Green Belt which is considered to be most relevant to the proposed development is the purpose of assisting in safeguarding the countryside from encroachment. In addition to the harm caused to the openness of the green belt by the proposed built development and car park the development would also harm the green belt through the encroachment of urban features into the countryside, contrary to the purposes of including land within the Green Belt. The principle element of urban encroachment associated with the development is the replacement of a 3,000m² greenfield area with a car park, albeit the car park would include significant landscaping and planting to soften and screen its appearance.

12. Additionally, although the applicant has intentionally proposed building designs which replicate the size, form and agricultural architectural style of the agricultural buildings to be demolished, it is nonetheless inevitable that the character of the building complex will change from that of a typical agricultural farm complex to more of the character of a business park/ research institution. This change in character will result from both the built form/ design, layout and lighting of the innovation centre and also the change in the intensity of use of the site, with the innovation involving a much high level of vehicular and pedestrian access and circulation around buildings than would be expected of a farm.

13. Overall, therefore, it is considered that the development would result in significant harm to the Green Belt in terms of inappropriateness, in terms of loss of openness and in terms of urban encroachment. As noted above, paragraph 88 of the NPPF advises that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

14. This report finds that the other harm which would be associated with the development comprises substantial harm to Saltaire World Heritage Site, harm to the undesignated heritage asset of the remains of the landscaped grounds of Milner Field House, harm to the particular character of the landscape, an unacceptable risk of harm to the adjacent Trench Meadows SSSI and harm to the safety of the road network. It is both the harm to the Green Belt and these other forms of harm associated with the development which fall on the negative side of the balance in the assessment of whether very special circumstances exist.

15. In terms of the positive side of the balance the applicant has submitted a Green Belt Justification Statement which sets out their view of the impact of the development on the Green Belt and the overriding benefits which they consider would be consequent from the proposals. The main considerations cited by the applicant in support of their proposal are:

- Very special circumstances exist in the first instance because there is a lack of harm to the openness of the Green Belt and the purposes of including land within the Green Belt.
- The development of an innovation centre accords with the established economic strategy of the district and the Leeds City Region Strategic Economic Plan. This strategy seeks to help foster the Districts indigenous companies and also attract the inward investment in the high value, creative and knowledge based industries by providing an attractive high quality environment across the District.
- The proposal helps fulfil the objectives of the Producer City strategy (developed in 2013) which focusses on creating the conditions to make Bradford the best place to set up, grow and run a business and putting skills, innovation and knowledge creation at the heart of the Bradford and region's economy.
- The proposal provides a collaborative approach (with both Bradford and Huddersfield Universities as shareholders in the project) to innovation which provides and enhances the skills base in the district and region in an appropriate setting. This is in accord with the Regional Economic Strategy 2006-2015, Bradford Local Economic Assessment and the Understanding Bradford District Report, all of which seeks to ensure that to provide for a more successful and competitive district economy, planning decisions should help support the potential of the University of Bradford, further and higher education institutions, and other knowledge – intensive industries including the tourism and cultural sector with the provision of innovation units within the Airedale Corridor.
- The proposal will deliver a facility which will help address the lack of STEM skills in the UK as a whole, and in Bradford in particular. Indeed, the proposal will improve the links between job opportunities, skills development and needs, business production and investment and the needs of excluded communities within Bradford district. It will form a major part of the regeneration of Yorkshire as a whole and will be at the centre of the Northern Powerhouse initiative,

- The innovation centre will provide a project which 3M, as a global enterprise, support and whom will be an ongoing investor in the centre.
- Overall, the proposal will deliver sustainable development by helping to build a strong, competitive economy which secures economic growth in order to create jobs and prosperity which proactively meets the development needs of business and support an economy fit for the 21st century (paragraph 23 of the NPPF).
- The provision of an innovation centre in this location will help support the sustainable growth and expansion of all types of business and enterprise in this locality as outlined in paragraph 28 of the NPPF. This will meet the strategic priority for the provision of jobs needed in the area as a whole. With the leading experts in innovation being shareholders and board members the intention is to create a centre of excellence in innovation that can be seen as a leader in global markets and put Bradford at the centre of the Northern Powerhouse initiative.
- Whilst the emerging Core Strategy makes provision for selective Green Belt deletions allowed under paragraph 83 of the NPPF to provide for 100 hectares of employment land within the City of Bradford, 30 hectares of employment land within the Airedale Corridor and 5 hectares of employment land in the Wharfedale corridor, this development is not seeking to change the designation of the Green Belt.
- The proposals have been very carefully designed to allow for the change of use of some of the buildings, and rebuilding of others on the same footprint and the same massing of the existing farm buildings along with the ecological management of the surrounding associated land in order that the proposal can sit within a quality environment and attract investment, jobs and skills to the district without creating harm to the attractive rural Green Belt setting.
- The proposal provides for significant environmental reinstatement to create a natural ecological state which provides significant gains for local wildlife and ecology and the use of innovative approaches to conservation. These public benefits are supported by paragraphs 109, 111, 112 and 117 of the Framework.
- The proposal also provides for the restoration of wetland habitat along with a watercourse through the site. It is considered that the establishment of these opportunities is in accordance with paragraphs 109, 111, 112 and 117 of the Framework. These advise that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils, recognising the wider benefits of ecosystem services and by minimising impacts on biodiversity and proving new gains in biodiversity, contributing to the Government's commitment to halt the overall decline in biodiversity.
- The proposals provide for public access to the site via positive links with the local community in the form of access to Salt Juniors garden. This accords with the requirements of paragraph 137 of the Framework which states that "local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and with the setting of heritage assets to enhance or better reveal their significance. Proposals that ...better reveal the significance of the asset should be treated favourably".
- The provision for school and youth educational visits, by invitation, to the environmentally reinstated area is also a welcome and positive feature of the development. Whilst the reinstatement of the land to its natural state contributes to protecting and enhancing the natural environment and to help improve biodiversity, the initiative to open the site for educational purposes fulfils a social role by supporting the health, and cultural well-being of the community.

- Significant public benefits arise from the provision of an improvement to the local landscape for both people and wildlife, by the establishment of opportunities for the local community and visitors to the area to interact with their environment. This is in conformity with paragraphs 9 of the Framework which states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environments, as well as in people's quality of life. Clearly moving from fields in constant use for a cycle of grazing and feedstuff production to one which achieves net gains for nature, and improving the conditions in which people work and take leisure is a very beneficial element of the scheme which fully meets the expectations of the Framework.
- Quality benefits in terms of health and well-being to the local community by facilitating woodland planting. As the Framework states, "sustainable development is about change for the better, and not only in our built environment. Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.
- Public access to the ruins of Titus Salts Jr's mansion house and provision of suitably designed interpretative features for the area are an integral part of the scheme. This is a very positive benefit which provides opportunities to enhance and better reveal the historical significance of the setting of the heritage assets of Salts Mill and the World Heritage site; as such, the proposal is in accord with paragraph 137 of the Framework which seeks to preserve those elements of the setting that better reveal the significance of the asset. The Framework advises that such benefits should be treated favourably.
- Whilst not specifically within the scope of this report, it is considered that due to the sensitive treatment of the landscape in this Green Belt location, ensuring that away from the existing and proposed built form the landscape remains open, it is considered that the rural backdrop to the setting of the World Heritage site will not be compromised. Whilst this element is not a 'very special circumstance', it should be considered as an asset to the World Heritage site.
- Overall, the substantial benefits which are advanced via this application are clearly unique to this Green Belt/rural site within this particular location of the World Heritage Buffer Zone and would not be replicated if the development was to be provided elsewhere in a City/Town Centre location.
- The site circumstances and those considerations put forward in this justification statement (even when attaching substantial weight to any harm to the Green Belt) are benefits that are considered to amount to 'very special circumstances' in this case which are sufficient to clearly outweigh the potential harm to the Green Belt and any other harm.

16. In terms of the above considerations it is accepted both that the development's impact upon the Green Belt will be reduced through the high quality design and landscaping approaches proposed and that the total built mass of development on the site will not increase significantly from the current condition of the site, other than in terms of the substantial new car park proposed. It is also acknowledged that the proposals for ecological enhancement are likely to result in some local benefits to biodiversity and that there are public benefits associated with increasing public access to the site, although the benefits associated with the proposed access improvement

works to the ruins of Milner Field House are queried for the reasons set out in the following section of this report.

17. Furthermore it is recognised that the development of an innovation centre within the District will be of significant economic benefit to the District and is consistent with the aspiration to provide incubator units and innovation units within Bradford City Centre and the Airedale Corridor set out in emerging policy EC1(F) of the Local Plan Core Strategy. Therefore it is recognised that the factors on the positive side of the balance are significant and should be given considerable weight.

18. However substantial weight must also be given to the harm the development will cause to the Green Belt and it is considered that the statement submitted by the applicant significantly understates this harm. Inappropriate development in the Green Belt can only be approved in very special circumstances. Very special circumstances can only be considered to exist where the harm the development will cause to the Green Belt and any other harm is clearly outweighed by other considerations. In coming to a decision on this planning application members of the Regulatory and Appeals Committee must consider whether the considerations set out above (either individually or in combination) clearly outweigh the harm the development will cause to the Green Belt and any other harm.

19. After giving due consideration to, and placing substantial weight upon, the benefits which would be associated with the development, in particular the economic benefits of facilitating the development of an innovation centre within the District, but also having considered the significance of the harm the development cause to the Green Belt, as well as the other forms of harm the development would cause, the advice of Planning Officers to the Regulatory and Appeal's Committee is that, in this case the positive factors associated with the development, even when considered in combination, do not clearly outweigh the harm the development would cause to the Green Belt, and accordingly, very special circumstances (so as to justify the inappropriate development in the Green Belt) do not exist and planning permission should be refused. It is further contended that, if the other forms of harm set out in this report are considered in combination with the harm the development would cause to the Green Belt, the benefits and circumstances associated with the development clearly do not outweigh the harm the development would cause.

3) Heritage

20. The proposal site is within the Saltaire World Heritage Site Buffer Zone and has cultural associations with Saltaire both in relation to the farm itself, which was set up as a model farm by Titus Salt Junior and also the remains of Milner Field House which exist on the site and which previously served as a mansion house for the descendants of Sir Titus Salt. The site also has significance through the fact that it effectively represents the only remaining substantial area of farmland located within the setting of Saltaire. Saved RUDP policy S/BH14 states that there will be a presumption in favour of the preservation of the world heritage site and its setting. Development which would adversely affect the character, appearance, setting or views into or out of the world heritage site will not be permitted. Therefore:

- 1) within the boundary of the world heritage site, as defined on the proposal map, applicants will be required to demonstrate that full account has been taken of the impact of their proposals upon the world heritage site and its setting and that their scheme will have no adverse effect upon it.

- 2) within the buffer zone, as defined on the proposals map, development which would be likely to adversely affect views into or out of the world heritage site will only be permitted where a suitable program of mitigation is proposed as part of the application.

21. The applicant has not conducted a Heritage Impact Assessment (HIA) based upon the ICOMOS guidance. A HIA using the ICOMOS guidance is the most thorough way to analyse whether and how Outstanding Universal Value (OUV) is impacted by the development. There are two "impact assessments" submitted with this application, by the Architectural History Practice, dated March 2016, and by Wardell Armstrong, dated April 2016.

22. In the latter document page 31 Wardell Armstrong have not analysed OUV and in fact have mistaken it for being confined to "critical views". The Architectural History Practice make no mention of OUV in their impact assessment and use a methodology from the Design Manual for Roads and Bridges. Whilst Bradford Council do not require an ICOMOS HIA of all applicants, many larger schemes within this sensitive heritage area do present them and they are considered the industry sector 'gold standard' for larger schemes in WHS. Previous public comments from the WHSO have highlighted issues related to assessment of significance and of impact.

23. Both the Council's World Heritage Site Officer and Historic England have been consulted on the application. Historic England have advised that the application site lies within the buffer zone to the Saltaire World Heritage Site (SWHS) and is identified as contributing positively to the setting of SWHS in the Saltaire Environmental Capacity Study published in 2006. The site also has a historic functional link with Saltaire village having been the home of Titus Salt Junior. The nineteenth-century farmhouse, the associated outbuildings and the surviving historic parkland around the complex are undesignated heritage assets of local significance.

24. In order to be designated as a World Heritage Site, Saltaire's Outstanding Universal Value (OUV) is clearly set out and tied to UNESCO criteria. Although Saltaire Village is of the highest degree of significance, as defined in the Glossary of the *National Planning Policy Framework*, the idea of significance as set out in the NPPF is not the same as OUV. Significance is a wider appreciation of a range of heritage values associated with the site.

25. Saltaire Village is of OUV as an outstanding example of a mid-nineteenth-century industrial model village. Its importance arises from the way in which the village represents Titus Salt's philanthropic intentions, town planning and social welfare ideas, as well as for the extremely high quality of the architecture of the village's built form.

26. The Statement of Outstanding Universal Value for Saltaire includes the following text:

"Beyond the (World Heritage) site's boundaries, development has surrounded the property to the east, south and west for the last century, with the remnant River Aire to the north."

"The original rural river valley setting has gradually disappeared over the last hundred years but significant views remain. Given that part of Salt's original intention was to locate Saltaire in a healthy environment, the buffer zone is important in this respect."

27. Titus Salt's vision was to give his workers somewhere to live and work which was removed from the unsatisfactory conditions of the industrial cities of the nineteenth century. The valley location with rural views beyond was a key part of achieving this vision, as well as providing him with the raw materials and transport connections needed to operate his successful mill.

28. Historic England advise that the rural and open character of the application site contributes to understanding Salt's original vision. This justifies the site's inclusion within the SWHS buffer zone. The site and surrounding area is identified as an 'important' rural backdrop in figure 9 of the *SWHS Management Plan 2014*. Historic England also confirm that the group of buildings at Milner Field Farm are of strong local interest and contribute to understanding the significance of the Salt family and the wider context of Saltaire.

29. Historic England have not raised strong concerns in relation to the built development aspects of the proposal but have raised concerns in relation to the proposed car park and have suggested the Council should consider whether the proposed landscaping measures will prevent the car park being dominant within key views towards Saltaire as identified in the management plan. They have also advised that any high level street lighting or flood lighting installed as part of the development would have a harmful impact on the rural character of the area, which is an important contributor to the OUV of Saltaire and would increase the visual impact of the development, particularly in winter.

30. The Council's World Heritage Site Officer has advised that Milner Field Farm and land contributes to our understanding of Attribute 4 of the Outstanding Universal Value (OUV) of Saltaire World Heritage Site. Put another way, Attribute 4 is an individual attribute which conveys the OUV of the World Heritage Site (WHS). Attribute 4 describes the landscape context for Saltaire and references 'intangible cultural heritage attributes and associations' (ICH).

31. ICH in this context can be summarised as the intimate historical and associative links between this Model Farm and its land, Titus Salt, his family especially Salt Jn and Saltaire and the light that these associations shed on our understanding and appreciation of the cultural heritage asset of Saltaire. In addition, the significance of locating Saltaire in the Aire Valley is mentioned in the UNESCO inscription statements of Integrity, Authenticity and Protection and Management Requirements as follows:

Integrity Statement: "...Beyond the site's boundaries, development has surrounded the property to the east, south and west for the last century, with the remnant Aire river landscape to the north..."

Authenticity Statement: "...The original rural river valley setting has gradually disappeared over the last one hundred years but significant views remain. Given that part of Salt's original intention was to locate Saltaire in a healthy environment, the buffer zone is important in this respect..."

Protection and Management Statement: "...There is a need to ensure that development in the buffer zone respects the surviving landscape setting of the property..."

32. The point being made in these Inscription Statements is that Saltaire's influence on the Garden City Movement in part stems from its deliberate (planned) juxtaposition with rural landscape. This juxtaposition helps us to understand the Victorian philanthropic paternalism for which Saltaire is inscribed. People working in Salts Mill could, almost uniquely at the time, have easy access to fresh air, woodland and farmed countryside and Milner Field Farm is one of the last remaining elements of this historic farmed countryside setting.

33. The Council's World Heritage Site Officer has advised that the development will make it impossible to 'present' or 'transmit' this aspect of OUV to future generations and this threatens the ability of the Management Committee for Saltaire WHS to adhere to Article 4 of the World Heritage Convention, which states at Article 4:

"...Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 (i.e. World Heritage Sites) and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation, in particular, financial, artistic, scientific and technical, which it may be able to obtain..."

34. Although this application does not harm part of the WHS in a physical way (for example by demolition of key buildings), it is one of the Council's duties to ensure that the OUV of this World Heritage Site can be presented and transmitted to future generations. The proposed development in the Buffer Zone has a range of uncertainties and harmful elements that puts at risk the Council's duty under the Article 4. The proposed development, if approved, may necessitate a review of the Statements of Authenticity, Integrity and Management within the UNESCO inscription to ensure they were still reflective of the site's values and attributes.

35. The World Heritage Site Officer has further advised that development on the Milner Field Model Farm will alter the setting of the WHS and destroy intangible cultural heritage (ICH) associations. The development of office buildings with attendant increases in traffic flows, car parking for 100 cars, site lighting and artificial landscaping will alter the appearance of the Farm. The Farm's land will stop being farmed and it will look different and its historic character will be changed, in essence, forever. The application has not provided sufficient comfort that these elements of the development will not cause harm.

36. There are also considered to be issues which will cause harm to Designated Views associated with the World Heritage Site. Although the proposed development has sought to replicate the footprint, massing and agricultural design ethic of the current site development it would involve substantial changes to external areas including: hard landscaping and outdoor socialising and circulation spaces, bin store and service access, 100 vehicle car park and site lighting arrangements required for security purposes. Also activity at the site in terms of the movement of people and vehicles would be much more intensive than the current level of activity associated with the dairy farm which would change the character of the site. Visualisations of 'how the View might appear' once development has taken place are, inevitably, static and cannot be fully relied upon.

37. The World Heritage Site Officer has advised that the harm caused by the proposed development to the OUV of Saltaire WHS would be irreversible and substantial. Irreversible, because functionally would change and so the ability for it to convey the 'intangible cultural heritage (ICH) associations' will be eroded. The development site's contribution to OUV would become considerably less evident and consequently much more difficult to present to future generations. Once the farm is gone and its land is altered it is considered to be highly unlikely that agricultural re-instatement could happen in the future and therefore the harm would effectively be irreversible.

38. The NPPF paragraph 133 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Paragraph 132 confirms that substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

39. In terms of the public benefits associated with the proposed development these are listed in detail in the preceding section and can be summarised as being:

- Ecological enhancement of the existing farmland principally through woodland planting and wetland enhancement;
- Increasing public access to the land generally;
- Specific proposals to make the ruins of Milner Field House accessible and legible;
- The economic benefits associated with the delivery of an Innovation Centre on the site.

40. In terms of the benefits of the proposed ecological enhancement of the farmland, these are recognised; however the delivery of ecological enhancement is not considered to constitute a public benefit so substantial/ exceptional that it would justify the level of harm the development would cause to the World Heritage Site. Equally increasing public access to the site is acknowledged to be a desirable outcome in terms of public access to the countryside; however existing footpath routes exist to the north and south of the site and it is not considered that securing additional routes through the site would result in such significant public benefits that the harm the development would cause to the World Heritage Site could be considered to be justified.

41. In relation to the specific proposals to clear and provide access to the remains of Milner Field House the Council's Senior Heritage Conservation Officer has advised that the whole of this wooded part of the estate is presently accessible and has been, without restriction, for many years. The woodland has been unmanaged and hence has become overgrown, although there is evidence of the historic layout and specimen planting in amongst. The applicant's proposals give no indication of how the house footprint is to be 'cleared' which could cause harm to its significance. The piles of rubble existing are not the safest of environments and would require further work to make accessible. This has both archaeological and heritage implications, neither of which are addressed. Furthermore the various areas of tree clearance illustrated would have a significant impact on the landscape and could therefore result in harm and not benefit.

42. The Senior Heritage Conservation Officer has further advised that the scattering of interpretation and benches would bring minimal benefit. The proposals give no indication of how the enhancements would be subsequently maintained, without which this is a pointless one-off exercise which would rapidly degenerate. Therefore the proposals for the historic house area risk substantial harm to the understanding and significance of the remains and landscaping and are considered to provide negligible benefit.

43. In relation to the potential economic benefits associated with developing an Innovation Centre on the site, as listed in the preceding section, these are acknowledged to be much more substantial. However these benefits are not considered to be so substantial, or the circumstances associated with the proposed development so exceptional, that the level of harm the development would cause to the Saltaire World Heritage Site would be justified. This is considered to be the case even when the benefits associated with the development are considered in combination.

44. It is therefore concluded that the proposed development would cause substantial harm to the Saltaire World Heritage Site and it is not considered either that the circumstances associated with the proposed development are wholly exceptional or that the substantial harm is necessary to achieve substantial public benefits that outweigh the harm. The proposal is therefore contrary to saved policy S/BH14 of the replacement Unitary Development Plan, emerging policies BD1, AD1 and EN3 of the Local Plan Core Strategy and paragraphs 132, 133 and 138 of the National Planning Policy Framework.

45. In relation to the undesignated heritage asset which the historic landscape associated with Milner Field House which is comprised within the proposal site, the Council's Senior Heritage Conservation Officer has advised that the landscape at Milner Field Farm was planned by an eminent landscape architect of the day, Robert Marnock. It was intended in the main as a working farm, with more formal planting in proximity to the mansion. The farmland was planned to provide open pasture, with deliberate specific tree planting on the peripheries and in small clumps, both to complement the overall desired landscape effect, and to screen elements which it was better not to see.

46. The Senior Heritage Conservation Officer advises that the proposal to 'naturalise' the landscape will result in a differing visual presentation to grazed meadow. Additional tree planting will significantly change the visual impression sought by Marnock and which was considered fashionable, for predominantly open pasture with structured tree planting. In combination, these changes will substantially impact the landscape character and historic significance of this landscape, contrary to saved RUDP policy BH17. The car parking, lighting and general presentation of the environs of the proposed 'innovation centre' also continue to conflict with the purposes of Policy BH17.

47. The Yorkshire Gardens Trust have also advised that the further revised application shows no improvement in the understanding of Robert Marnock's work at Milner Field, despite his being one of the greatest nineteenth century landscape designers. The design of the new extensive tree and shrub planting scheme, is again completely unlike Marnock's original design, and if implemented would totally destroy over 50% of Milner Field's historic parkland within its designed landscape garden,

together with nearly all its historic meadowland, and thus cause severe harm to Milner Field's designed historic landscape.

48. This further revised plan would also result in severe harm to this landscape garden's pastoral setting, both to the north and south of the Carriage Road on approach to the East Lodge. This pastoral setting is a key component of the Marnock design and the retention of Beck Side Close and Holme Close as meadows is essential in order to retain the initial section of the intended dramatic approach to the site of Mansion, through an avenue of horse chestnut trees flanking these meadows.

49. The Yorkshire Gardens Trust therefore advise that, as the applicant has failed to demonstrate that this further revised application would not result in the loss of features which form an integral part of the special character of this Robert Marnock designed historic landscape, and also failed to demonstrate that it would not detract from the enjoyment, lay out, design character or appearance, we consider this proposal to be contrary to Policy BH17.

50. It is therefore also considered that the proposed development and associated landscape management proposals would have an adverse effect on the Milner Field House historic garden/ parkland. The proposal is contrary to saved policy BH17 of the replacement Unitary Development Plan, emerging policy EN3 of the Local Plan Core Strategy and paragraph 135 of the National Planning Policy Framework.

4) Landscape

51. Saved policy NE3 of the RUDP states that within the Landscape Character Areas, development will be permitted if it does not adversely affect the particular character of the landscape. Saved policy NE3A states that development likely to affect the landscape will be assessed having regard to the extent to which it would cause unacceptable visual intrusion; introduce or remove incongruous landscape elements; cause the disturbance or loss of or help to maintain:

- 1) Landscape elements that contribute to local distinctiveness;
- 2) Historic elements which contribute significantly to landscape character and quality, such as field, settlement or road patterns and landform;
- 3) Semi-natural vegetation which is characteristic of that landscape type;
- 4) The visual condition of landscape elements.

52. The site lies within the green belt of the Airedale Landscape Character Area and the Landscape Type is "wooded incline". Relevant RUDP policies NE3 and NE3A apply. The overall description of the "wooded incline" landscape type states that "The wooded incline covers substantial areas of Airedale, located on the steeper valley slopes. There are five large areas of wooded incline which are prominent due to the valley landform and views afforded from across the valley. They often contain a mixture of woodland with associated pasture – in fact, many of these areas are not densely wooded but may also include large areas of sparse or dense scrub. Some of the woodland and associated habitats are of good ecological value.

53. The wooded areas generally spread up the hillside from the valley bottom and rarely extend over the top of the slope. The visual prominence and enclosure of the "wooded incline" is described as prominent and open" The large blocks of woodland are

visible from the valley floor and across the valley from many viewpoints. Although the wooded areas could appear contained from within, the broad shape of the Aire Valley gives a sense of openness rather than enclosure." The historic continuity of the "wooded incline" is described as high" Although settlement has encroached into the edges of the wooded incline, there has been a continuity of woodland/pasture incline within the Aire Valley for over a century."

54. The landscape analysis of the "wooded incline" generally is that it has a moderate strength of character" Seemingly dense areas of woodland contribute to the character of the Aire Valley but have been weakened by the encroachment of settlement. Views of urban areas are dominant from many locations.", the condition is described as declining" Substantial areas of woodland are being fragmented by the encroachment of piecemeal development, recreational pressure and the lack of or inappropriate management."

55. The overall landscape strategy guidelines are to "conserve and enhance" the "wooded incline"... "Conserve the wooded nature of the incline by resisting any proposals which would reduce the area of woodland or scrub or fragment the overall cohesiveness of the landscape unit, and especially where this would occur on the upper edges of the wooded incline."... "Conserve and protect the woodlands which have the greatest ecological value; ensure good management and encourage regeneration of semi-natural habitats by removing 'naturalised non-native' species. Manage the scrub habitat around the woodland edges to increase visual interest and habitat value."... "Enhance the existing woodland cover by additional tree planting, where appropriate and especially where development has encroached, resulting in an adverse impact upon the landscape. Concentrate new woodland planting in areas where this will have the greatest visual impact." Protect the universal value of the Saltaire World Heritage Site and minimise the negative impact of development within the Buffer Zone on the World Heritage Site."

56. The policy guidelines regarding the potential for development within the "wooded incline" state that..."With moderate strength of character, high historic continuity and a prominent, open character the wooded incline is sensitive to change."... "The wooded character is an important element of Airedale but pressure for suburban development is beginning to erode that value, for example, on prominent slopes at Thwaites/Long Lee.

57. Settlement is encroaching up the slopes from the valley bottom and it is important that these substantial woodland blocks are strengthened to mitigate the impact that recent developments have had on the Aire Valley. One of the features of Airedale, in general, is the equal proportions of woodland, pasture and settlement and this balance must be maintained in order to retain the character of the area."... "Should further development be required, small scale schemes of traditional detached housing or small hotel/office developments absorbed within a well wooded framework, to balance the landscape, would be most appropriate and could strengthen the current weaker edges where settlement has begun to intrude upon the skyline.

58. Large scale suburban housing estates would be difficult to absorb into a wooded landscape and should not be considered on the upper slopes. Development of the pastures within the wooded incline are not appropriate as the open grassland and scrub elements form an important part of the landscape unit." Any proposals within the Airedale Landscape Character Area "wooded incline" should therefore look to

conserving and enhancing the landscape character of the area and any potential future development should consequently be sympathetic to this character.

59. The Council's Landscape Architect has reviewed the landscape analysis contained within the submitted Environmental Statement and also the Landscape Statement submitted by the applicant. The Landscape Architect has advised that she believes that the proposed development applications do not accord with either policies NE3 or NE3A because the proposals for a car park within the historic landscape setting would adversely affect the distinctive existing landscape character of the area and the important historic landscape setting of the Milner Field Farm. Furthermore the proposals for considerable additional tree planting around the farm buildings and around the proposed car park would be detrimental to the unique historic parkland landscape character of the area.

60. It is considered that the proposed development would adversely affect the particular character of the landscape and cause the disturbance or loss of historic landscape elements which contribute significantly to landscape character and quality. The proposal is contrary to saved policies NE3 and NE3A of the replacement Unitary Development Plan and emerging policy EN4 of the Local Plan Core Strategy.

5) Ecology

61. This application is in close proximity to Trench Meadows Site of Special Scientific Interest (SSSI). Natural England have been consulted on the application and have confirmed that they consider that there is currently not sufficient information to determine whether the proposal will have a significant impact on the interest features for which the site has been designated.

62. In order to resolve their concern Natural England have requested further information on the proposed species to be introduced to the site and their provenance, including proposed wetland species and the assemblage to be used on the green roof. Natural England have further advised that the close proximity of the site increases the likelihood of any inappropriate species spreading from the application site to the SSSI, where such species could adversely impact its interest features. In particular, the origin of any species which are very rare and vulnerable on the SSSI, such as herb-paris *Paris quadrifolia* and early purple orchid *Orchis mascula*, would need to be carefully selected.

63. Natural England have also advised that further information is required on the ongoing management of the site, including whether any pesticide or fertiliser use is proposed and what biosecurity measures are to be put in place to prevent non-native invasive species or pathogens being brought on to the site. This should be informed by details of the current condition of the land and sward composition, including soil samples to determine the phosphorus index of the soil. As the land has been dairy pasture to date it is likely that the soil will have high nutrient levels which may preclude the establishment of a species-rich sward. If less desirable species i.e. competitive grasses or forbs such as white clover or injurious weed species take hold, this may impact on the plant community within the SSSI.

64. Natural England have also requested further details on the proposed sustainable drainage scheme, including information on water sources, management of water quality, maintenance of swales to prevent build-up of pollutants in the soil, and any other pollution prevention measures proposed. There are several flushes within the SSSI, which are notified features of the site and which drain into the watercourse running along the shared boundary with the application site. Natural England have further requested further information on what mitigation measures should be put in place to prevent any impact of herbicide treatment on the SSSI.

65. In light of their concerns Natural England have advised that, if the Council resolved to grant planning permission for the proposed development Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended), places a specific the duty placed to:

- Provide notice to Natural England of the permission, and of its terms, the notice to include a statement of how (if at all) the Council has taken account of Natural England's advice, and
- Not grant a permission which would allow the operations to start before the end of a period of 21 days beginning with the date of that notice.

66. On the basis of the information currently submitted it is considered that the landscape management proposals included with the development scheme pose an unacceptable risk of adversely affecting the Trench Meadows Site of Special Scientific Interest, contrary to saved policy NE8 of the replacement Unitary Development Plan and paragraph 118 of the NPPF.

6) Flood Risk & Drainage

67. The proposal site is partly located within Flood Zones 2 and 3, as defined by the Environment Agency flood risk maps; however the area to be developed as the innovation centre building complex is exclusively within flood zone 1 (where the risk of floods occurring is assessed to be in excess of 1 in 1,000 years). The Environment Agency have therefore confirmed that they have no objection to the proposed development in relation to flood risk.

68. Saved RUDP policy NR16 states that development proposals, which add to the risk of flooding or other environmental damage, as a result of surface water run-off will not be permitted unless effective control measures are provided. The policy also requires that development proposals incorporate sustainable drainage systems (SUDS), which control surface water runoff, as close to source as possible, wherever practicable. The applicant has proposed a surface water drainage system primarily draining to the existing watercourse which runs through the site, with flows attenuated through use of SUDS. These drainage proposals have been reviewed by the Council's Drainage Team who have confirmed them to be acceptable and consistent with saved policy NR16, subject to full drainage details being reserved by planning condition.

69. However Yorkshire Water have raised concern that, on the Statutory Sewer Map, there are 150mm diameter public foul, 225mm diameter public combined, 300mm diameter public combined and 375mm diameter public combined sewers recorded to cross the site. Yorkshire Water have advised that it is essential that the presence of this infrastructure is taken into account in the design of the scheme. A stand-off distance of 3 (three) metres is required at each side of the 300mm & 375mm diameter public combined sewer centre-lines.

70. Yorkshire Water further advise that it appears that the 375mm sewer is in an area proposed for woodland planting which is not acceptable. Yorkshire Water have consequently requested that the relevant drawings and associated landscape documents are amended prior to determination and Yorkshire Water re-consulted. Trees must not be planted 5m either side of the public sewer centre-line(s).

71. Although the concern of Yorkshire Water in relation to the proposed woodland planting on the line of the 375mm public sewer is considered to be valid, it is considered that this concern could be resolved through the imposition of a planning condition requiring the requested plan revision to be made and for the suggested 5 metre easement to be observed. Therefore it is not considered that this matter constitutes a reason for refusing planning permission.

7) Traffic Impact

72. Paragraph 32 of the NPPF indicates that all developments that generate significant amounts of movement should be supported by a Transport Statement or

Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

73. Saved policies TM2 and TM19A of the RUDP indicate that development which will lead to unmitigated adverse impacts on proposed or existing transport infrastructure will not be accepted and that road safety is a material planning consideration. RUDP Annex C specifies parking standards for residential development and saved RUDP policy TM12 indicates that in determining planning applications for residential developments the Council will require provision of parking in accordance with the council's adopted standards, although lower parking standards can apply for developments of affordable housing and for units located in the city and town centres with very good levels of public transport accessibility.

74. A Transport Assessment (TA) has been submitted in support of the application. The development scheme includes on-site highway infrastructure improvements in terms of the formation of 2 passing places on the site's single carriageway access road and the formation of a 100 space car park but no proposals for off-site highway improvements. The car park includes 3 visitor spaces, 3 disabled spaces, 5 car share spaces and 5 spaces equipped with electric vehicle charging points. A service access and bin store is also proposed to the rear of block D.

75. In terms of the accessibility of the development by modes of transport other than personal vehicles the TA's claim that the proposal site is a highly sustainable location are not considered to be valid. The nearest bus stops to the site are on Gilstead Lane about 800m from the site and are used by the 615, 616, 622 and 623 services. The first two provide a combined half hourly service during the day and hourly during the evening and on a Sunday between Bradford, Bingley and Eldwick. The latter two provide the combined daytime service with a 30 minutes frequency over the same route. The rail station in Bingley is located approximately 1.8km southeast of the site.

76. The separation distance between the proposal site and these bus stops exceeds the normally recommended maximum walking distance to a bus stop and it should also be noted that this walk would be uphill on the return journey. Equally the site is not well connected to the District's main cycle routes and the nature of the proposed land use is such that the future occupants of the site are unlikely to be drawn from the nearest walking distance population centre of Gilstead. It is therefore not considered that the proposal is consistent with the NPPF paragraph 34 test of being a location where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

77. The traffic generation data within the Transport Assessment indicates that the proposed development would generate 44 vehicle trips during the morning peak and 35 vehicle trips during the evening peak hours. The Transport Assessment concludes that the proposal is acceptable in terms of the capacity of the local highway network to safely accommodate the additional traffic which would be generated by the proposed innovation centre development. The main basis for this conclusion is cited as the lack of a significant accident record for the relevant roads/ junctions and also that the predicted modest increase in traffic flows which would be consequent from the development could be offset by the removal of the existing farming operations with associated movement of large vehicles.

78. The submitted Transport Assessment and the general traffic and transportation impacts of the development have been assessed by the Council's Highways Development Control Team. The outcome of this assessment is that the Highways Development Control Team have raised concerns in relation to the highways impacts of the development in terms of its effect in intensifying traffic over the canal bridge on Primrose Lane, known as Fisherman's Bridge. This bridge is single carriageway, without footway, and is relatively heavily trafficked by both pedestrians and vehicles at the start and the end of the school day for Beckfoot School.

79. The applicant has provided a Transport Assessment Addendum which seeks to demonstrate that the traffic generated by the development would not result in traffic conditions prejudicial to highway/ pedestrian safety at this bridge. However no mitigation is proposed to resolve the concern which has been raised. The addendum provided by the applicant has, again, been reviewed by the Highways Development Control team, who have indicated that they do not consider that the information provided by the applicant is sufficient to be confident that the development would not unacceptably worsen the safety of this bridge at peak school times.

80. It is considered that the increase in the intensity of traffic over Fisherman's Bridge which would be consequent from the proposed development would lead to increased road safety risks associated with potential conflicts between vehicles and pedestrians particularly at peak school access times. The highways safety impact of the development in relation to this intensification of traffic over the bridge would be considered to be severe and therefore the proposal is contrary to saved policies TM2 and TM19A of the replacement Unitary Development Plan and paragraph 32 of the National Planning Policy Framework.

8) Environmental Impact Assessment

81. The proposal is accompanied by an Environmental Statement and is for EIA development, as defined by The Town and Country Planning (Environmental Impact Assessment) Regulations 2011. In considering this application all relevant environmental information has been taken into account including the environmental statement, further and other information, and all representations made by consultation bodies in relation to the environmental effects of the development

9) Community Safety Implications:

82. The 'National Planning Policy Framework' makes clear that a key objective for new developments should be that they create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion. Design and access statements should demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places, as set out in Safer Places - The Planning System and Crime Prevention.

83. Saved policy D4 of the RUDP makes clear that new developments must incorporate the principles of secured by design, (SBD) and further states that developers will need to ensure that crime prevention is considered an integral part of the initial design of any development and not retrospectively or as an afterthought, in particular they will need to demonstrate how their development proposal has addressed the following issues in respect of designing out crime.

- 1) Natural surveillance of public and semi-private spaces in particular entrances to a development, paths, play spaces open spaces and car parking.
- 2) Defensible space and the clear definition differentiation and a robust separation of public, private and semiprivate space so that all are clearly defined and adequately protected in terms of their ownership and use.
- 3) Lighting in the development in particular streets and footpaths.
- 4) The design or any layout of pedestrian cycle and vehicular routes into and within the sites including how they integrate with existing patterns.
- 5) Landscaping and planting, hiding places and dark secluded areas should not be created.

84. The West Yorkshire Police Architectural Liaison Officer (ALO) has advised that, whilst there is a 'design & Access statement' submitted with the application that covers most points listed above, some areas require further clarification.

85. In terms of perimeter security the Police ALO has requested that either hedges/ planting are continued along the north and east of the site or that perimeter fencing is installed to around 1800mm which will provide more defensible space towards the rear

of the development. The ALO has also recommended installing some form of access restriction on the main entrance such as lockable gates or access control barrier which will prevent any unauthorised visitors from entering the development when the facilities are closed.

86. The ALO has also queried whether the existing track which leads towards Higher Coach Lane will be retained and used as an exit or emergency route, If this route is being retained the ALO has advised that it would be prudent to install some form of access restriction such as gated access along the hedge/ fence line to secure the boundary perimeter of the site.

87. The Police ALO has also requested the installation of lighting to cover the car parking areas and footpaths, in addition to the entrances and exits of the buildings. Any proposed lighting around the scheme should have good colour rendition and uniformity levels. In locations where impact on wildlife is a concern low level led lighting is suitable to use with hooded canopies which prevents any light pollution whilst still provide enough illumination to the areas required. The Police ALO has also requested the installation of monitored CCTV to cover the areas noted above including the inside of the buildings such as reception areas, entrances / exits, and work in conjunction with the lighting.

88. In relation to Physical Security the police ALO has suggested that, in relation to elevation 3 block B, the steel posts which support the canopies above the windows should be removed, as the posts could be used as a climbing aid to gain access onto the roof. If a canopy has to be installed it would be better if this was self-supporting in design, also elevation 4 block E, the Y frame steel supports again could provide a climbing element onto the sloped roof, it would be better if there were fewer canopy supports and if these were supporting each end.

89. Finally the Police ALO has advised that any door sets or ground floor or accessible windows look to achieve SBD standards. The main reception entrance should have some form of access control such as electronic intercom system that is vandal resistant, (DDA) Disability Discrimination Act compliant with CCTV and audio capabilities, in addition to access control on the main buildings such as swipe card reader / key fob access (which are security encrypted to prevent unauthorised copying) or key pad access which will prevent any strangers from entering the buildings.

90. The Police ALO has confirmed that West Yorkshire Police have no objection in principle to the proposal should the above recommendations be applied.

10) Equality Act 2010, Section 149:

91. In writing this report due regard has been taken of the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between different groups and foster good relations between different groups, in accordance with the duty placed upon Local Authorities by Section 149 of the Equality Act 2010.

92. The context of the site, the development proposed and the representations which have been made have been reviewed to identify the potential for the determination of this application to disadvantage any individuals or groups of people with characteristics protected under the Equality Act 2010. The outcome of this review is that there is not considered to be any sound reason to conclude that refusing planning permission would unfairly disadvantage any groups or individuals with protected characteristics.

93. Equally, if the Committee resolved to grant planning permission, there does not appear to be any sound reason to conclude that allowing the development to proceed would unfairly disadvantage any groups or individuals with protected characteristics.

Reason for Refusing Planning Permission:

- 1) The proposal is for inappropriate development within the Green Belt which would harm the Green Belt both due to the reduction it would cause to its openness and the encroachment it would lead to of urbanising features into the Green Belt. The economic, public and environmental benefits associated with the development have been carefully considered; however these benefits are not considered to clearly outweigh the harm the development would cause to the Green Belt by reason of inappropriateness, either when considered in isolation or when considered in combination with the other forms of harm the development would cause. The proposal is contrary to saved policy GB1 of the replacement Unitary Development Plan and paragraphs 87 and 88 of the National Planning Policy Framework.
- 2) The proposed development would cause substantial harm to the Saltaire World Heritage Site. It is not considered either that the circumstances associated with the proposed development are wholly exceptional or that the substantial harm is necessary to achieve substantial public benefits that outweigh the harm. The proposal is contrary to saved policy S/BH14 of the replacement Unitary Development Plan, emerging policies BD1, AD1 and EN3 of the Local Plan Core Strategy and paragraphs 132, 133 and 138 of the National Planning Policy Framework.
- 3) The proposed development and associated landscape management proposals would have an adverse effect on the Milner Field House historic gardens/ parkland. The proposal is contrary to saved policy BH17 of the replacement Unitary Development Plan, emerging policy EN3 of the Local Plan Core Strategy and paragraph 135 of the National Planning Policy Framework.
- 4) The proposed development would adversely affect the particular character of the landscape and cause the disturbance or loss of historic landscape elements which contribute significantly to landscape character and quality. The proposal is contrary to saved policies NE3 and NE3A of the replacement Unitary Development Plan and emerging policy EN4 of the Local Plan Core Strategy.
- 5) The proposed development would intensify vehicular traffic over a single carriageway bridge over the Leeds and Liverpool Canal on Primrose Lane close to Beckfoot School. This increase in the intensity of traffic over the bridge would lead to increased road safety risks associated with potential conflicts between vehicles and pedestrians particularly at peak school access times. The highways safety impact of the development in relation to this intensification of traffic over the bridge would be considered to be severe and therefore the proposal is contrary to saved policies TM2 and TM19A of the replacement Unitary Development Plan and paragraph 32 of the National Planning Policy Framework.
- 6) The landscape management proposals included with the development scheme pose an unacceptable risk of adversely affecting the Trench Meadows Site of Special Scientific Interest, contrary to saved policy NE8 of the replacement Unitary Development Plan and paragraph 118 of the NPPF.