

Bradford Metropolitan District Council
By Email

CPRE West Yorkshire
29th August 2019

Dear Sir/Madam,

Planning Application 19/02504/MAF: Hybrid application at Esholt Estate, Bradford

CPRE's headline comments

We warmly welcome the applicant's declared aspiration to create a 'truly sustainable development' at Esholt, which we believe has the potential to become a new episode in the long and interesting life of this unique site. The area must not be urbanised as a result of the proposals, and we see the built interventions as being rural developments – that is, they must be appropriate to the countryside.

We support appropriate redevelopment of the brownfield elements of the site, although we consider that the masterplan should be extended well beyond the red-line boundary to show how the various elements of the application will fit into a sustainable future for this wonderful area of countryside. The future of Esholt Hall and gardens, and the surrounding landscape, are particularly important to this.

We consider that the environmental enhancement opportunities for the area do offer very special circumstances for development in the Green Belt, although we do not accept that there is a strategic case for housing or employment land that would, in itself, justify Green Belt development. There is potential for a very special outcome, and we hope that the applicant, the Council and the local community will be able to work together to realise that potential.

We wish to see a development that looks forward to a 'low-car' future, where active travel is a realistic and attractive choice for many trips. To that end, we wish to see the station park & ride enhanced and expanded as a well-designed gateway to the site, alongside further measures to reduce car traffic within the site. Further thought should be given to a mixed use solution for the proposed employment area that enables functions which could bring vitality and purpose to a rail accessible location, for example some small shop units, nursery, bakery.

The residential scheme has many positive features but it is in an unsustainable location. On balance, if the full range of enhancements to the site and the landscape, for the benefit of the community, can be achieved, then we are willing to accept the shortcomings of the location, though a creative approach to public transport access would be very welcome improvement. We have a preference for a more compact layout, allowing more room for communal green space, tree planting and visitor parking.

We support the principle of redeveloping the filter beds for employment and/or mixed use, but we do not consider B8 storage and distribution uses to be appropriate or sustainable for this location, and in our view this should be removed. Given the outline nature of the employment proposals, we would wish to see a clear set of conditions on any approval, to lock in important aspects of the future character of this part of the site.

Our detailed position is set out below.

Overall principle of development

CPRE is a strong supporter of sustainable development and the re-use of brownfield sites. The built elements of these proposals – residential and employment – are contained within those parts of the site currently occupied by disused tanks and filter beds, we support the principle of a suitable redevelopment of those brownfield areas.

Having met with Keyland and Yorkshire Water, we believe we have a good understanding of their aspirations for the site, and the values that underpin their proposals. We particularly welcome their aims to create an exemplar of water efficient, flood resilient development, and to embrace the unique characteristics of the Esholt site. Avoiding a generic residential scheme, typical of a volume housebuilder, is crucially important on such a unique site, and it is clear from the detailed residential proposals that the applicant intends a bespoke solution. To that extent, we welcome the proposals, and we are actively seeking an opportunity to champion – locally and nationally – a scheme that re-uses brownfield land and demonstrates that innovative approaches are achievable.

Development in the Green Belt

From a policy perspective, it may not be necessary to demonstrate very special circumstances for re-use of brownfield land in the Green Belt, so long as the development does not have a greater impact on the openness or purpose of the Green Belt than the previous use. The existing uses generate very low volumes of traffic, are quiet and dark at night, and are well-screened by mature woodland. Bringing in all the urbanising impacts of 150 homes and 100,000 square metres of business space could potentially have a dramatic impact on tranquillity, which CPRE regards as a form of openness. Openness is not only visual, and tranquillity is not only about sound – the two qualities are inter-related. It is therefore our view that this application *does* need to demonstrate very special circumstances.

It is also clear that the character and openness of the countryside not just within the site but also across a wider area may be impacted by the presence of housing and employment on the site. However, continued or increasing dereliction is not desirable, the current blocking of the site by disused compounds and gated roadways, and the way that the community is excluded from enjoying Esholt Hall and its gardens, seriously undermine the site's existing role as a countryside asset.

We do not accept that the scale of need for the residential or employment development are, in themselves, justifications of very special circumstances. This is because:

- The total quantity of housing development proposed is low, and there is no strategic case for off-plan, Green Belt sites to be required to meet housing need.
- The affordable housing provision proposed is 30 dwellings. The relatively isolated location (about 1.5km from a bus service and 3km from a rail service) means that the proposed residential site is not, in principle, a sustainable location for new housing. Therefore the case for affordable housing in the area is really a matter of meeting localised need, which would normally be dealt with through exception sites.
- There are serious concerns about the road traffic implications of the employment development, and the Highways response (10th June) indicates a need for major interventions which imply that this is not, in reality, a suitable location for general employment.

However, the enhancement opportunity offered by a sensitive redevelopment of the site does, in our view, provide a much more compelling case for very special circumstances. This opportunity encompasses:

- Opening up public access to the site itself, the Hall and gardens, and the wider countryside the site sits within;
- Enhancing the appearance and function of the site by removing dereliction;
- Improving the ecological and heritage assets of which the site is part;
- Providing an exemplar of sustainable design and construction.

In other words, the opportunity to create what we term a very special outcome does, in our view, justify very special circumstances for development in the Green Belt in this location.

Proposed Uses and Masterplan

After careful consideration, we have reached the conclusion that the future of this site must be determined on the basis that it remains in the countryside. That is to say, it must not 'urbanised' by its redevelopment. The site has a long and fascinating history, and it is essential that it continues to tell an interesting story long into the future. The site and its immediate surroundings are characterised by:

- A country house and its estate, in need of enhancement;
- Ancient and other woodland, in need of connection, management and a net gain approach to ecology;
- A wealth of heritage features, with opportunity for much greater public engagement;
- Recreational access for walkers and cyclists, with scope for improvement;
- A central, functional role in Leeds and Bradford's water management, which will continue;
- A historic village, whose own character must be cherished;
- The Leeds-Liverpool Canal, which is not only a recreational corridor but also offers great potential for active travel to access the area on foot, cycle or boat;
- Some dereliction, which needs to be removed.

Looked at in this way, it is evident that the residential and employment elements of the scheme should be considered as two rural developments within a wider countryside setting. But it is essential that this wider countryside setting fully informs the planning application, so that the enhancement opportunities can be properly harnessed, as well as management of some risks such as vehicle traffic and parking. To that end, we consider that a more comprehensive area masterplan of the wider area is needed, and should be integrated with the West Yorkshire Green Infrastructure Strategy. We understand that much of the surrounding land is in the ownership of Bradford MDC, so it should not be too complex a process to produce such a plan.

We understand that Esholt Hall is now to be retained in Yorkshire Water's ownership, but falls outside of the red-line boundary for this application. In our view it is essential that the role of the Hall and gardens in the masterplan is properly set out before this application can be determined. There are several reasons for this:

- Opening up the Hall and gardens to the public is a huge economic and cultural opportunity, though with capital costs;
- The Hall is the central feature of the landscape here, which is currently hidden away, so the masterplan does not make sense without it;
- The Avenue role in the landscape is at least as important as its role as a means of access;
- There may be some amenities and community facilities that could be provided at the Hall to serve its re-configured estate.

Vehicle Access & Sustainable Travel

We believe that the whole site should be designed with a low-car future in mind. That means providing good opportunities for residents and businesses to have the vehicle access they need, but designing the scheme to actively encourage non-car access and ensuring that roads and spaces are multi-use instead of car-dominated. We do not think the masterplan adequately describes how this will be addressed, and further work is needed on this aspect.

Perhaps the biggest sustainability challenge for the whole scheme is that the residential element is located to optimise the re-use of the northern brownfield part of the site – the primary tanks – but this is also the most physically remote part of the site. That means it is the location most likely to encourage residents and visitors to choose their own car for the majority of journeys. If we ask the question, 'does the reclamation of the brownfield site in itself justify an unsustainable location?' our answer would have to be 'no', because it will lock in an unsustainable pattern of movement. This is especially problematic for people making multi-destination trips, such as to school and to work, because the options of catching a bus from Esholt, or cycling to Apperley

Bridge or Guiseley, quickly become unworkable. An unsustainable location also increases the likelihood of the site becoming snarled with additional vehicles.

An alternative approach would be to find a different, non-residential re-use for the primary tanks site and move the residential element into a mixed-use development with small business units at the south end of the site. We believe such a proposal would have merit, but it is not what is proposed in this application and we must address whether the residential scheme as proposed can be deemed sustainable. We will return to this issue later in our submission.

Having met with residents of Esholt, we know that the local community has concerns about how vehicle traffic to the new housing will be managed, and we defer to them in making representations about that matter. We also note the Air Quality Officer's response that the issue of minimising car-based journeys to school has not been resolved. We support the principle that there should not be through traffic using the site. In our view, the permit scheme for residents of Esholt village and the new housing needs to be tightly controlled, and a creative solution is needed such as an electric shuttle bus running regularly between Guiseley station and Apperley Bridge station, to give rapid access to the site from two rail routes. If this encouraged recreational visits to the area that could support its viability, and it could be a great way to increase accessibility for people who do not drive.

We have a number of concerns and suggestions about the proposed new access route from Station Approach.

- We understand that pedestrian and cycle access will be opened up from the station footbridge onto the Avenue. In our view this is essential both to the legibility of the site, and to encouraging active travel.
- The existing park and ride car park is already at capacity and is poorly screened and brightly lit, creating an unsightly landscape feature. The applicant tells us that the new road will provide landscape screening to the car park, which we would welcome.
- We consider that the role of the station car park should be scaled up, along with landscape mitigation. Providing a significantly larger, multi-use car park at the gateway to the site would enable many recreational visitors to the Hall, gardens and woodland to park safely and dramatically reduce the need for cars to access the Avenue. Effectively, it would put people arriving by train on an equal footing with those arriving by car: once at the site's gateway, they would then enter the site predominantly on foot or bicycle. Vehicle access to the site could then be limited to delivery vehicles, disabled users and permit holders, and the user experience within the site would be largely car-free. It might, in fact, be worth considering a sensitively designed multi-storey car park and public toilet building at the station, since it could provide greater capacity and be less anomalous in the landscape than a sprawling surface car park. We assume these measures will require collaboration with West Yorkshire Combined Authority and Network Rail.

The residential proposals

150 homes amounts to a new hamlet, substantially larger than Esholt village, and it is essential that this has appropriate amenities. The proposed community co-working space is therefore to be welcomed, and the new homes will be within a 10 minute walk of existing amenities in Esholt, which should benefit from additional custom.

CPRE generally campaigns for higher residential densities, not simply to reduce land-take but also because more compact places with people living closer together are better able to support local amenities and enable social cohesion. We understand from the applicant that the density of the proposed scheme is 22 dwellings per hectare, which is less than half of our recommended minimum for new housing, and much lower than the historic centres of most small villages. Indeed, we estimate that the density of Esholt village is around 60-70 dwellings per hectare. However we do not think a larger housing development on the proposed site would be

appropriate, because it would be out of scale with Esholt village. Even so, we would prefer to see a denser layout, with more terraced homes, allowing for more communal green space, additional tree planting – not least for carbon sequestration - and a well-screened courtyard for recycling facilities and visitor parking, to avoid the risk of cars and bins cluttering the street scene.

The proposed western village green, shared with Esholt village, is potentially compromised by the new scheme being at significantly higher level than the green, but there may be a way to resolve this. This feature also seems to be diluted by an additional village green at the eastern end of the housing. A better solution might be to have just one village green at the western end, with a café/kiosk at the co-working space with terracing down to the green. A more compact housing layout would allow for a children's playground at the upper level, adjacent to the co-working space. This shared village green is also the gateway to the proposed heritage trail.

We must return, then, to the matter of whether there are sufficient sustainability measures to minimise and mitigate the unsustainable location of the housing. We welcome the applicant's aspirations for sustainable construction, passive design features and for showcasing water efficiency and flood resilience. On balance, it is the combination of the re-use of the primary tanks, the opportunity for a genuinely innovative residential development model that could offer an exemplar elsewhere, plus – vitally – the opportunity for enhancement of the surrounding landscape and public enjoyment of that landscape, that make the case to justify the residential scheme.

In short, if all these other ingredients add up, then CPRE would be willing to sanction the residential use on the primary tanks site.

The employment proposals

There is currently a potential mismatch between the generalised nature of the outline application – 100,000m² of employment space – and the fine-grained approach suggested by the indicative layout. Of particular concern is that the Commercial Design Guide for the site, posted on the application portal on 8th August, allows for up to 22,000m² of B8 storage and distribution – which could easily be interpreted to mean a very large shed with a substantial number of commercial vehicle movements. This would be an unsatisfactory outcome, especially as the proposed layout would result in those larger vehicles having to travel throughout the employment site to reach the further-away buildings. Considering the policy justification for developments near the motorway – such as around the M62/M606 interchange – to be dominated by B8 uses in order to keep larger vehicles off the local road network, we do not see any justification to give 20% of the employment space to B8 on this unique, sensitive site a long way from the motorway, and we consider that this provision should be removed from the scheme.

We consider that the employment area also has scope to be more mixed-use, generating vitality and place-making opportunities. For example, if a children's nursery and a small parade of shops for passing trade were provided, then there would be greater potential for existing and new residents, workers in the employment area and visitors to the Hall and woodlands to make the most of a rail-accessible location.

The employment area is shown on the masterplan with a layout that suggests it may be suited to a rural setting, but clearly the layout is only indicative, and we would therefore suggest that key aspects of this should be locked into any outline permission by use of conditions - for example, the retention of the pump-houses.

It is unclear why the two 'hub buildings' are at the extremities of the employment area, rather than centred around the wetland and 'campus parkland', where there appears to be better opportunity for place-making and interaction between people from different parts of the site.

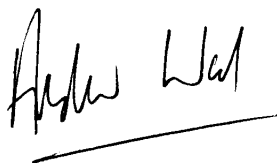
We would also wish to see the environmental credentials firmed up by conditions. The Design Guide makes reference to measures such as passive solar design, green roofs and solar PV panels, but in our view the

employment buildings need to be as exemplary as the housing. We would therefore wish to see zero-carbon being mandatory, and all roof surfaces to be either green or solar PV depending on their orientation.

Closing remarks

We hope you find our comments useful and constructive. We look forward to seeing the additional evidence that has already been requested by consultees, particularly a comprehensive heritage assessment for the wider site, and we hope you will agree with us the need for a wider masterplan before a determination can be made. We anticipate that the proposals will evolve further in the coming months and we ask that you keep us informed of amendments or further opportunities to comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Wood', is written over a horizontal line.

Andrew Wood
Consultant Planning Officer, CPRE West Yorkshire