



*City of*  
**BRADFORD**  
METROPOLITAN DISTRICT COUNCIL

## **Local Plan for the Bradford District**

### **Allocations Development Plan Document**

### **Further Issues and Options**

### **Green Belt Review – Draft Methodology Paper**

**December 2017**

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## SCOPE OF CONSULTATION

<b>Topic of this consultation</b>	The council is consulting on the proposed methodology for carrying out a 'Green Belt Review', which will form part of the Bradford District Local Plan evidence. The context for undertaking the 'Green Belt Review' is set out in the council's adopted Local Plan Core Strategy available at: <a href="https://www.bradford.gov.uk/planningpolicy">https://www.bradford.gov.uk/planningpolicy</a>
<b>Scope of this consultation:</b>	The purpose of this consultation is to seek views from the relevant stakeholders and the general public on the proposed approach for undertaking the 'Green Belt Review'.
<b>Geographical scope</b>	This consultation applies to the proposed Green Belt Review methodology for the Bradford District.

## BASIC INFORMATION

<b>To:</b>	This consultation is principally addressed to members of the public, community groups, and those professionally and personally interested in the Bradford District Local Plan
<b>Body responsible for the consultation:</b>	City of Bradford Metropolitan District Council
<b>Duration:</b>	This consultation will begin on Monday 18th December 2017 and will run for 6 weeks until Monday 29th January 2018. All responses should be received by no later than 5.00pm on Monday 29th January 2018.

<b>Enquiries</b>	<p>For any enquiries about the consultation please contact:          Email: <a href="mailto:planning.policy@bradford.gov.uk">planning.policy@bradford.gov.uk</a>          Phone: <a href="tel:01274433679">01274 433679</a></p>
<b>How to respond</b>	<p>Consultation responses should be submitted via email to <a href="mailto:planning.policy@bradford.gov.uk">planning.policy@bradford.gov.uk</a></p> <p>We strongly encourage all respondents to respond preferably by email if possible. However, should you be unable to respond online we ask that you complete the questions accompanying this document and send to:</p> <p>Local Plan          4<sup>th</sup> Floor Britannia House          Hall Ings          Bradford          BD1 1HX</p>

## 1. Introduction

- 1.1 Green Belt is a longstanding national planning policy in the United Kingdom. It is located in specifically designated areas around many, but not all, cities and towns.
- 1.2 The government's current policy for Green Belt is expressed in the National Planning Policy Framework (NPPF), the fundamental aim being “to prevent urban sprawl by keeping land permanently open”. National planning policy sets out that Green Belt serves five purposes:
- 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.
- 1.3 The Council has committed to a selective review of the District’s green belt as part of its Local Plan process. This is because some releases of green belt land will be required to meet the Council’s housing and economic growth targets in full, as set out in the adopted Core Strategy (2017).
- 1.4 The overall purpose of the ‘Green Belt Review’ will be to assess areas of the green belt against its main purposes in national policy, to determine how it is currently contributing to those purposes and to support the identification of the most appropriate land to be used for development through the Local Plan.
- 1.5 There is no set national guidance on how green belts should be reviewed. This report sets out the Council’s proposed approach for reviewing the District’s green belt.
- 1.6 It is important to note that the final ‘Green Belt Review’ report will not identify land for release or development. The findings from the report will be used along with a range of other evidence in the allocation of sites in the Local Plan.
- 1.7 The purpose of this document is to set out a draft methodology for a selective review of the green belt boundary within Bradford District. Following this consultation the council will publish a statement of consultation setting out how the council has responded to the main issues raised. When the methodology has been established following public consultation and any subsequent necessary changes made, the council will undertake the review using the established methodology. The results and recommendations will be set out within a final ‘Green Belt Review’ report, which will be made available as part of technical evidence at the next formal Local Plan consultation stage.

## 2. Summary of Approach

- 2.1 Any proposed changes to the green belt boundaries will be subject to several stages of consultation as part of the Local Plan Allocations Development Plan Document (DPD) process. Specifically, this paper represents the proposed methodology for undertaking the assessment of parcels of the green belt against the 5 purposes of green belt.
- 2.2 The 'Green Belt Review' will be undertaken in 3 steps:
- **Step 1 – Initial Sieving:** This step will remove areas of strategic importance which are protected by national or European law and national policy.
  - **Step 2 – Parcel Identification:** This step will identify green belt parcels with clearly defined boundaries using readily recognised features. Parcels will then be subject to testing in Step 3.
  - **Step 3 – Parcel Assessment:** This step of the Green Belt Review is to assess how the parcel is performing against the five main purposes of green belt:
    - Purpose 1: To check the unrestricted sprawl of large built-up areas;
    - Purpose 2: To prevent neighbouring towns from merging into one another;
    - Purpose 3: To assist in safeguarding the countryside from encroachment;
    - Purpose 4: To preserve the setting and special character of historic towns; and,
    - Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.3 The green belt boundaries of all settlements within the Core Strategy Settlement hierarchy will be assessed objectively and consistently against the local interpretation of the 5 purposes of green belt, to determine the extent to which parcels are considered to be currently fulfilling the role of the green belt. The 'Green Belt Review' will enable green belt parcels to be assessed to whether they are currently performing a strong green belt function.
- 2.4 Green belt parcels will be classified as follows<sup>1</sup>:
1. **Weakly Performing Parcel** – Parcel currently weakly performing against 3 or more green belt purposes.
  2. **Strongly Performing Parcel (Potential Mitigation)** – Parcel currently strongly performing against 3 or more of the purposes but with the potential to incorporate mitigation measures which could allow for the identification of a development site without a significant impact on the strategic functioning of the green belt (e.g. changing the size of a parcel through the creation of new defensible boundaries);
  3. **Strongly Performing Parcel** - Parcel currently strongly performing against 3 or more of the purposes with little or no potential for mitigation.

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<sup>1</sup> See Appendix 1 Detailed Assessment Result Scenarios Matrix

- 2.5 The results of the 'Green Belt Review' will be integrated into the Allocations DPD site assessment process (as set out in the Council's site assessment methodology document). It will both assist in the assessment of green belt sites already within the Council's list of options and provide the basis for assessing, for each settlement, whether there are other land parcels which would provide further or better options in green belt terms. In settlements where green belt release is required to meet the housing target (i.e. where there are insufficient sites in non-green belt locations), potential sites located within weakly performing parcels shall be considered in the first instance for allocation for housing / employment. Those sites located within 'Strongly Performing (Potential Mitigation)' parcels will also be considered should there be a lack of sites located within weakly performing parcels or where those potential sites in weakly performing parcels are ruled out for other reasons through the site assessment. Sites located within strongly performing parcels with little or no potential for mitigation will not be considered for allocation.

***Question 1: Do you agree with the overall approach set out above?***

### 3. Policy Context

#### Overview

- 3.1 The Council are currently preparing a Local Plan which will replace the adopted Replacement Unitary Development Plan (2005). The Local Plan consists of the following of Development Plan Documents:
1. Core Strategy
  2. Allocations Development Plan Document (DPD)
  3. Bradford City Centre Area Action Plan (AAP)
  4. Shipley and Canal Road Corridor AAP
  5. Waste Management DPD
- 3.2 The Council formally adopted the Core Strategy as part of the statutory development plan for the Bradford District as of July 2017.
- 3.3 Core Strategy Strategic Core Policy SC7 sets out the council's approach to the green belt, reaffirming its role and confirming that exceptional circumstances exist which require release of land from the green belt in order to deliver in full the required housing and jobs growth in the District. The Core Strategy plans for development and green belt change across the District in line with the settlement hierarchy and confirms any changes to green belt will be delivered by a selective review of green belt boundaries in locations that would not undermine the strategic function of Green Belt land.
- 3.4 The aim of the Green Belt Review will be to undertake an objective, evidence-based assessment to identify 'the most appropriate land' in green belt terms to be considered for development'. It is important to stress that the 'Green Belt Review' will not in itself recommend which areas of land should be allocated for development as it will concentrate purely on how land parcels perform against the 5 purposes of green belts. Decisions on which sites would be the most appropriate to allocate will be based on a wider range of criteria and evidence, the approach for which has been set out in the Council's Site Assessment Methodology paper published in 2016 as part of Issues and Options consultation. Thus while the 'Green Belt Review' will direct the consideration of which green belt parcels might provide options for allocation it will sit alongside a range of other evidence and policy considerations that will inform the production of the Allocations DPD.
- 3.5 Decisions to make specific alterations to the green belt boundary and release land from the designation will need to demonstrate that 'exceptional circumstances' exist for altering those green belt boundaries (NPPF paragraph 83). Only when 'exceptional



circumstances' exist should the council consider changes to green belt boundaries by having regard to their intended permanence in the long term and ensuring that boundaries are capable of enduring beyond the plan period.

## **National**

3.6 The starting point for any review of green belt is national green belt policy. The National Planning Policy Framework (NPPF) states that the fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of green belts are their openness and their permanence. green belts can shape patterns of urban development and help to ensure that development occurs in locations allocated in development plans. They help to protect the countryside, be it in agricultural, forestry or other use and can assist in moving towards more sustainable patterns of urban development.

3.7 The NPPF identifies the 5 key purposes of green belts as the following:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from 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.

3.8 Although not part of the purposes of green belt the NPPF indicates that once they have been identified, green belts also have a positive role to play in fulfilling the following:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, and enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and,
- to retain land in agricultural, forestry and related uses.

3.9 The NPPF requires that local planning authorities, when reviewing green belt boundaries, take account of the need to promote sustainable patterns of development. When defining boundaries, the NPPF requires that local planning authorities should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;

- Not include land which it is unnecessary to keep permanently open;
- Satisfy themselves that green belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

3.10 Green belt boundaries defined in adopted local plans or earlier approved development plans should be altered only in exceptional circumstances through preparation or review of the local plan. Detailed boundaries should not be altered or development allowed merely because the land has become derelict.

3.11 Boundaries should be clearly defined, using readily recognisable features such as roads, streams, and belts of trees or woodland edges where possible.

## **Local**

3.12 The development plan for Bradford comprises the recently adopted Core Strategy (adopted July 2017), adopted Waste Management DPD (adopted October 2017) and the saved policies from the Replacement Unitary Development Plan (adopted October 2005). The Council is currently in the process of adopting two Area Action Plans covering Bradford City Centre and Shipley and Canal Road Corridor, with formal adoption by Full Council due to take place in December 2017. The Council is in the process of producing the Allocations DPD, which (upon adoption) will form the final piece of the Local Plan, replacing the Replacement Unitary Development Plan. The Council is also supporting the production of a number of Neighbourhood Plans across the District, which will form part of the Local Plan. It should be noted in line with current Government guidance these Neighbourhood Plans cannot change the boundary of the green belt. All changes to the green belt boundary, if necessary, will only be made through the Allocations DPD.

## **Bradford Core Strategy (July 2017)**

3.13 The Bradford Core Strategy, which was adopted in July 2017, sets out the spatial direction for future development within the District to 2030. The Core Strategy contains the following policies and objectives with direct relevance to the designation of green belt:

- **Strategic Core Policy 5 (SC5): Location of Development**  
The policy provides a framework and sequential approach for the allocation of development sites which prioritises the use of deliverable previously developed land, focuses as much development as is practicable and viable within the existing urban area and therefore minimizes the amount of dispersal of

development to edge of settlement locations and the need for changes to green belt.

- **Strategic Core Policy 7 (SC7) Green Belt**

This policy provides the context and scope for the selective review of the green belt. This policy states that the review of the green belt is needed in order to deliver in full the longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3. Criteria B of Policy SC7 sets out the policy context for the 'Green Belt Review'.

Other relevant Core Strategy Policies for this review include:

- Sub Area Policy BD1: The Regional City of Bradford including Shipley and Lower Baildon
- Sub Area Policy BD2: : Investment Priorities for the Regional City of Bradford
- Sub Area Policy AD1: Airedale
- Sub Area Policy AD2: Investment Priorities for Airedale
- Sub Area Policy WD1: Wharfedale
- Sub Area Policy WD2: Investment Priorities for Wharfedale
- Sub Area Policy PN1: South Pennine Towns and Villages
- Policy HO2: Strategic Sources of Housing Supply
- Policy HO7: Housing Site Allocation Principles
- Policy HO11: Affordable Housing
- Policy EN1: Protection and improvements in provision of Open Space and Recreation Facilities
- Policy WM2: Waste Management
- Policy ID1: Development Plan Documents and Annual Monitoring Report

### **Bradford Replacement Unitary Development Plan (Saved Policies)**

3.14 The Bradford Replacement Unitary Development Plan (rUDP) was adopted in October 2005, with most of the policies saved through Direction by the Secretary of State in 2008. The rUDP sets out the current extent and detailed boundaries of the green belt in the District which will form the start point for the 'Green Belt Review'. The rUDP also contains the following policies and objectives with direct relevance to the designation of green belt:

- Policy GB1  
The policy sets out the need for applicants to demonstrate very special circumstance to develop in the green belt other than a set number of development types.
- Policy GB2  
The policy sets out how certain new buildings may be acceptable in principle in the green belt.
- Policy GB3

The policy sets out the criteria for developing in settlements 'washed over' by green belt.

- Policy GB4

The policy sets out the criteria for conversions and change of use of buildings within the green belt.

## **Sustainable Development**

3.15 The purpose of a green belt review is to assess how well the current adopted green belt functions against its main purposes and to support the identification of the most appropriate land to be used for development through the Local Plan. The process of determining the final site allocations through the Site Assessment process, will involve testing site options against a wide range of other criteria and allow their sustainability to be assessed and compared.

3.16 The NPPF identifies the relationship between sustainable development and green belt is that, 'when drawing up or reviewing green belt boundaries, local planning authorities should take account of the need to promote sustainable development' (NPPF para. 84).

3.17 The Council has already established at a strategic level a spatial strategy through the Core Strategy which will result in the promotion of a sustainable pattern of growth across the District. It has also used the Bradford Growth Assessment to confirm where growth can be accommodated in the most sustainable locations. However promoting sustainable development in line with Government policy will also require the detailed testing and comparison of all proposed site allocation options against a range of environmental, economic and social indicators and this will form part of the wider work in developing the preferred approach within the Allocations DPD. In line with Core Strategy Policy SC5 accessibility testing will form a key part of this work as will considering the potential impacts (and mitigation potential) of site options on the District's key environmental assets.

## **Exceptional Circumstances**

3.19 In 2017 Bradford Core Strategy was found sound (subject to a number of modifications being applied) and approved by the council following an independent Examination in Public. Core Strategy Strategic Core Policy SC7 sets out the council's approach to the green belt, reaffirming its role and confirming that some releases of land from the green belt will be needed, but indicating that the revised green belt boundary should endure for at least 15 years from adoption of the Core Strategy.

- 3.20 Policy SC7 Green Belt provides the context and scope for the 'Green Belt Review'. This policy states that the review of the green belt is needed in order to deliver in full the longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3. Criteria B of Policy SC7 sets out the policy context for the 'Green Belt Review'.

**Strategic Core Policy SC7 Green Belt**

*B. Exceptional Circumstances require Green belt releases in order to deliver in full the longer term housing and jobs growth in the District as set out in Policy HO3 and Policy EC3. These changes will be delivered by a selective review of Green Belt boundaries in locations that would not undermine the strategic function of green belt within the Leeds City Region and that would accord with the Core policies and the strategic patterns of development set out in Policies SC5 and SC4. The Decisions on allocations on green belt land will be assessed against the purposes of including land in green belt as set out in national guidance. The selective review will be undertaken through the Allocations DPD in consultation with local communities and stakeholders*

- 3.21 Policy SC7 together with the Council's evidence submitted as part of the Core Strategy Examination indicate that there are exceptional circumstances which justify releasing green belt to meet the objectively assessed needs for new homes in the District. The Council considers, having reviewed the evidence and all reasonable alternatives, that exceptional circumstances exist which justify and require a change to the green belt in order to meet its development needs for housing in full and to support long term economic success of the District. It is also noted that the land supply evidence indicates change maybe required to green belt in most settlements in the District. Core Strategy Policy HO7 seeks to ensure that through the Allocations DPD site selection process the use of green belt land is minimised.
- 3.22 Alongside establishing that the land supply in non-green belt locations is not available to meet the District's full needs, the Council have also undertaken a District Wide Growth Assessment. This has confirmed that there are potentially sustainable locations within the green belt for growth and that there are areas where the green belt can be changed without leading to the undermining of the role of the green belt either locally or strategically.

## Policy Summary

- 3.23 In summary NPPF paragraph 47 makes clear that Local Plans should meet their objectively assessed housing need in full, as far as is consistent with the policies set out in the framework. The Core Strategy has confirmed that the Council is planning to meet its need in full with the land supply being dependent on the release of significant amounts of currently designated green belt land. NPPF Paragraph 83 allows for the review of green belt boundaries under exceptional circumstances through the preparation of the Local Plan. Core Strategy Policy SC7 establishes that such exceptional circumstances exist and will also ensure that the key purposes of green belt as well as any strategic role it performs are considerations in any proposed changes to the green belt boundaries through the Allocations DPD.

## 4. Methodology

### Introduction

4.1 The 'Green Belt Review' will be conducted in three distinct steps. These steps are:

1. Initial sieving
2. Parcel Identification
3. Parcel Analysis

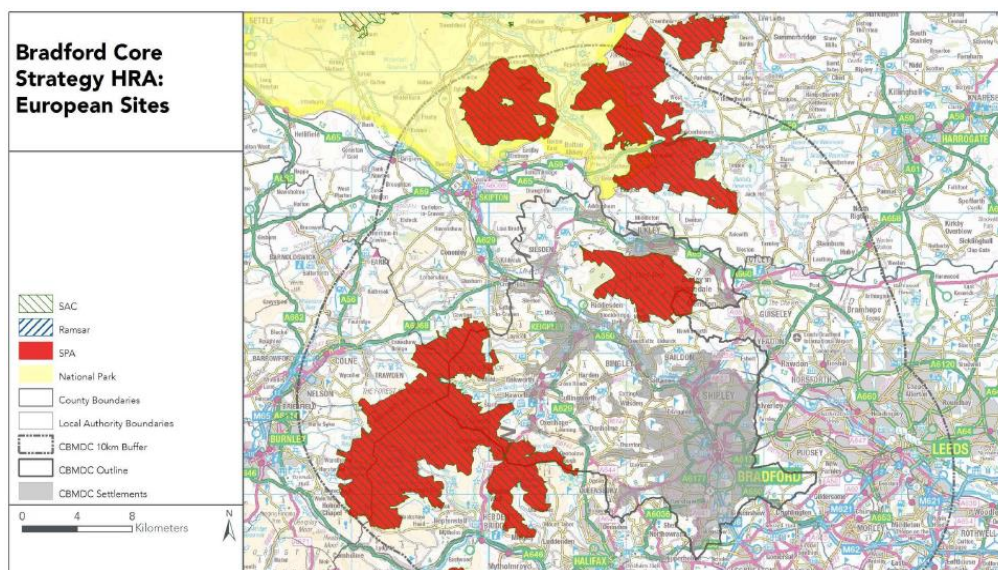
4.2 This report contains only the methodology for the 3 steps set out above. When the methodology has been established following public consultation and any subsequent necessary changes, the green belt will be reviewed using the established methodology. The final results and recommendations will be set out within a final 'Green Belt Review' paper, which will be made available at the next stage of the Local Plan production.

**Question 2: Do you agree with the 3 Step approach set out above?**

### Step 1 Initial Sieving

4.3 Using the existing green belt within Bradford as a starting point, the first step of the sieving process is to remove areas of strategic importance which are protected by national or European law and national policy. In terms these strategic constraints, these consist of the South Pennines (Phase 2) Special Protection Area and Special Area of Conservation (SPA/SAC) located in the North East and South West of the District, as shown in Figure 1 below; and Flood Zone 3b. If a parcel contains 100% of either designation, it will be removed from any further analysis. Other constraints which may render a site unsuitable for development (such as HSE exclusion zones, class 1 archaeological areas) will be factored into the final site selection process as part of the overall Allocations DPD site assessment.

Figure 1 - European Sites (SPA/SAC)



**Question 3 – Do you agree with the overall sieving approach taken in Step 1 of the Methodology?**

**Step 2 - Parcel Identification**

- 4.4 The next step of the 'Green Belt Review' will be to identify green belt parcels which would be subject to more rigorous testing against the criteria for each green belt purpose identified in Step 3.
- 4.5 Boundaries should be clearly defined using readily recognisable features where possible. Weak boundaries can be vulnerable to urban encroachment, whereas strong boundaries are less likely to be altered on an ad hoc basis, and are more likely to withstand the passage of time.
- 4.6 Green belt parcels will be identified using the following criteria;
- Parcels surrounding and / or within close proximity of settlements identified within the hierarchy as set out within the Core Strategy;
  - Parcels should not cross defensible boundaries such as motorways, rivers or protected woodlands. Each parcel should be clearly defined by durable, significant and strong physical boundaries wherever possible;
  - Parcels should take account of changing landscape and landform and should therefore be of similar character and land-use;
- 4.7 Parcel identification will be primarily desktop based using aerial photography and Ordnance Survey (O/S) digital mapping data to establish parcels, supplemented by site surveys where required. Due to the varied and often rapidly changing landscape and landform in Bradford, potentially a large number of parcels will be identified through this process. It is important to note that due to the criteria set out above, the parcels identified will not be of a uniform size or shape and may therefore vary greatly in regards to their overall dimensions.
- 4.8 Each study parcel will be assigned a unique identifier, and will be mapped using the Council's Geographic Information System (GIS).
- 4.9 Green belt land located outside the identified parcels will automatically be classified as Strongly Performing a green belt function and thus will not be examined in detail using the assessment methodology. This approach is consistent with NPPF (para 84.) that 'when reviewing green belt boundaries, local planning authorities should take account of the need to promote sustainable development' (NPPF para. 84).



**Question 4: Do you agree with the overall approach taken for identifying green belt parcels in Step 2 of the Methodology?**

### **Step 3 – Parcel Assessment**

- 4.9 Following the identification of green belt parcels surrounding each settlement within the settlement hierarchy, the next step of the 'Green Belt Review' is to assess how the parcel is performing against the five main purposes of green belt:
- To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns from 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.
- 4.10 In order to assess the green belt land against the five NPPF purposes, a set of local assessment criteria for each purpose has been developed. The justification for the criteria used are set out below and will be included in the survey pro-forma for each parcel to record the findings of the assessments, with the majority of criteria answered with a 'Yes', 'No', response. Written comments will also be provided for each parcel to explain how a judgement has been arrived at where appropriate. In addition, supporting text will explain how the overall parcel classification has been arrived at for each purpose.
- 4.11 The completion of the pro-forma will be undertaken in a consistent and structured manner by the Council's Planning Policy Officers through desk-based analysis using GIS and relevant evidence studies as well as site visits. Each completed pro-forma will be cross-checked to ensure results are being consistently recorded. The assessment against these criteria will enable an overall conclusion to be made whether the parcel meets that particular green belt purpose. Officer's planning judgement will be used to arrive at an answer for each criterion under each purpose.
- 4.12 The assessment will judge the value of the green belt by establishing if each parcel meets the five green belt purposes as set out in the NPPF. Parcels will be assessed against each of the five green belt purposes by answering YES or NO to a series of local criteria questions. The results of this assessment will enable the council to assess how strongly each parcel currently performs against each of the five green belt purposes.
- 4.13 Following this an overall conclusion on how each parcel currently performs in terms of its green belt function will be made. Parcels that

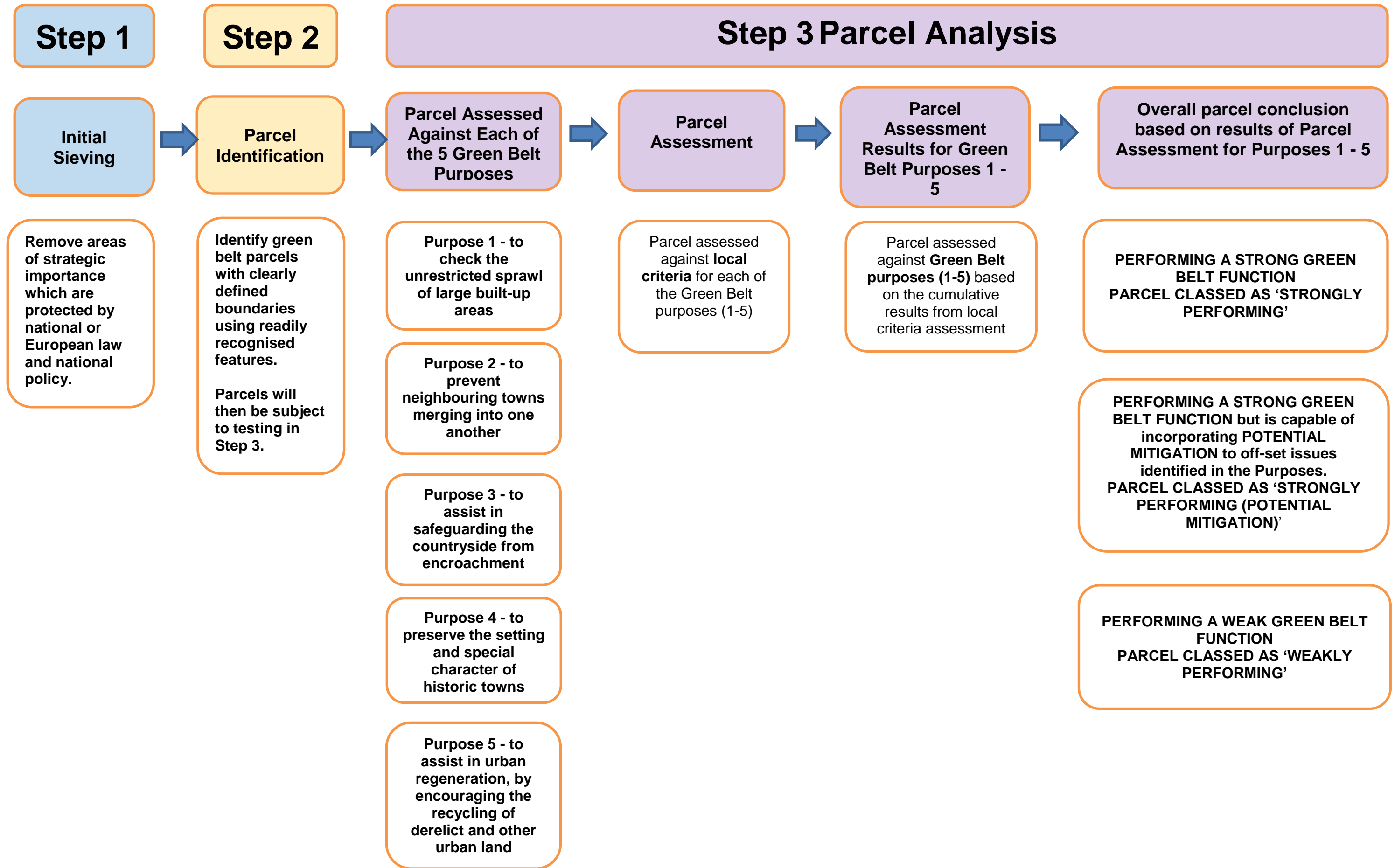
perform strongly against 3 or more of the identified green belt purposes will be assessed as 'Strongly Performing' as they are judged to be currently performing a strong role in regards to their greenbelt function. Those parcels currently performing 3 or more of the purposes but with the potential to incorporate mitigation measures which could allow for the identification of a development site without a significant impact on the strategic functioning of the green belt' (e.g. changing the size of a parcel through the creation of new defensible boundaries) will be classified as 'Strongly Performing' (Potential Mitigation). The remainder of the parcels, only performing strongly against 2 or less of the identified purposes, will be classed as 'Weakly Performing'.

- 4.14 A summary of the methodology can be found under Figure 2, and the detailed approach (and the assessment result scenarios) to the parcel assessment process is set out within Appendix 1.
- 4.15 As each purpose of the green belt is considered to be equal (the NPPF does not give a greater importance to one purpose over another), no weighting to any of the assessment criteria will be applied.
- 4.16 The results of the assessment will be recorded in a proforma<sup>2</sup> and mapped using GIS mapping software. This approach to assessing the green belt purposes allows the Council to demonstrate a clear and transparent evaluation that sets out the information needed to judge the overall contribution of each identified parcel. The assessment of each purpose will be supported with text, which will explain how the sensitivity classification has been arrived at. The comments recorded in the parcel proforma<sup>2</sup> will also provide transparent justification for the decision arrived at for each criteria assessed.

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<sup>2</sup> See Appendix 2 for an example of the Parcel Assessment Proforma

Figure 2 - Summary of Green Belt Methodology



## Next Steps Following Review – Site Assessment Report

- 4.17 In settlements where green belt release is required to meet the housing target (i.e. where there are insufficient sites in non-green belt locations), potential sites located within ‘Weakly Performing’ parcels shall be considered in the first instance for allocation for housing / employment. Those sites located within ‘Strongly Performing (Potential Mitigation)’ parcels will also be considered should there be a lack of sites located within weakly performing parcels or where those potential sites in weakly performing parcels are ruled out for other reasons through the site assessment process. Sites located within ‘Strongly Performing’ green belt parcels with no potential for mitigation will not be considered for allocation.

***Question 5: Do you agree with the overall approach for assessing green belt parcels against the five purposes of green belt outlined for Step 3?***

### Local Assessment Criteria for Assessing Green Belt Purposes

- 4.18 National Planning Policy and Guidance provides relatively limited detail for interpretation of the five purposes of the green belt. The following section sets out the proposed local criteria to be used for the assessment of parcels against each of the five green belt purposes and the justification for the chosen criteria. These have been based on national policy and good practice and adapted to take account of local circumstances. During the production of this methodology paper, consideration has been given to the green belt review approaches of other Local Planning Authority’s within the Leeds City Region.

## **Purpose 1: To check the unrestricted sprawl of large built-up areas**

### **Overview and Background Research**

- 4.19 The Planning Advisory Service (PAS) 'Planning on your Doorstep: The Big Issues Green Belt' (February 2015) guidance emphasises the variable nature of the term 'sprawl' and whether positively planned developed constitutes 'sprawl'.
- 4.20 The PAS note also suggests that land which is partially contained by built form, dependant on scale, would effectively be identified as 'infill', and therefore this land is likely to make a relatively limited contribution to the overall green belt.
- 4.21 Analysis of other Local Authorities whom have undertaken green belt reviews and which have Local Plans that have recently been found-sound or Local Plans which have progressed to a significant degree, identifies the following themes in the assessment of the purpose 1:
- Define the local interpretation of 'large built up areas' within the Local Authority and neighbouring Authorities; and,
  - Define the strength of the existing boundary in preventing unrestricted urban sprawl, which would not otherwise be prevented by a barrier; and,
  - Define methods for assessing the role of the green belt in protecting open land surrounding these large built up areas; and,
  - Define the role of the green belt in preventing continuous ribbon development causing unrestricted sprawl.
- 4.22 Based on the review of PAS guidance, recently adopted Local Plans or recently undertaken green belt reviews, it is possible to devise a local interpretation of the Purpose 1 of the green belt for Bradford MDC.

### **Applying Purpose 1**

- 4.23 The approach for Purpose 1 seeks to assess the strength of the existing green belt boundary to determine the extent to which it is able to restrict 'sprawl' of large built up areas in the Bradford District. Sprawl has therefore been defined as the 'spreading out of built form over a large area in an untidy or irregular way' (Oxford English Dictionary). Purpose 1 of the Green Belt also refers to 'large built-up areas and it is therefore necessary to determine what constitutes a large built-up area specifically for Bradford.

## Definition of Large Built-up Areas

- 4.24 The Bradford Core Strategy (adopted 2017) identifies the Regional City of Bradford as the primary-tier settlement within the Settlement Hierarchy. Within the Core Strategy, the Regional City of Bradford includes the City Centre, Shipley and Canal Road, and Lower Baildon.
- 4.25 The Core Strategy identifies 3 further tiers within its settlement hierarchy as follows:
- 1) **Principal Towns** – Ilkley, Keighley and Bingley
  - 2) **Local Growth Centres** – Burley-in-Wharfedale, Menston, Queensbury, Steeton, Silsden and Thornton
  - 3) **Local Service Centres** – Addingham, Baildon, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Oakworth, Oxenhope, Wilsden
- 4.26 The use of a settlement hierarchy in guiding and controlling the distribution of growth and development is a tool which plays a major role in establishing a sustainable pattern of growth and development across the District.
- 4.27 The Core Strategy sets out under Strategic Core Policy 7 that changes to the green belt will need to be made in sustainable locations to meet identifiable development needs within the majority of the District's settlements and sub areas. Such a requirement therefore applies to settlements and areas within each of the tiers of the Core Strategy settlement hierarchy. The need to review green belt boundaries applies to most locations and these are locations which have been judged to offer sustainable opportunities for development (albeit at widely differing scales). Therefore although many of those settlements are both small and self-contained, the decision has been taken to interpret the term 'large built up areas' broadly so that it covers all those settlements within the hierarchy.
- 4.28 Finally, Bradford has a number of small 'stand-alone' settlements completely washed-over by green belt. These settlements include Brunthwaite, Keelham, Denholme Gate, Laycock Esholt, Micklethwaite Goose Eye, Stanbury, Hainworth, Tong and Harecroft. Due to their size, relative isolation and lack of services these settlements will not be defined as a 'large built-up area' in terms of this study. Having defined large built up areas the table below summarises the criteria that will be used to assess parcels against Purpose 1 with the following text providing more detail as to how each criteria will be applied.

### **Question 6: Do you agree with how the Council has defined 'Large Built Up Areas'?**

**Table 2 - Purpose 1 Assessment Criteria**

Purpose 1	Aim	Criteria	Assessment
<p>To check the unrestricted sprawl of large built-up areas</p>	<ul style="list-style-type: none"> <li>• Protects open land which is contiguous to, connected to or in close proximity to a 'large built up area'</li> <li>• Prevents sprawl of the built form, which would not otherwise be restricted by a durable boundary.</li> </ul>	<ol style="list-style-type: none"> <li>1. Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl?</li> <li>2. Would development of the parcel result in an isolated development site not connected to existing boundaries?</li> <li>3. Is this Green Belt parcel only connected by two or less boundaries to the built up area?</li> <li>4. Would development of the parcel lead to/ constitute ribbon development?</li> <li>5. Would development of the parcel create an irregular settlement pattern?</li> </ol>	<ol style="list-style-type: none"> <li>1. The presence and permanence of recognisable defensible boundaries that separate areas of land, such as roads, railways, watercourses, tree belts, woodlands. If response is YES, higher potential for unrestricted sprawl.</li> <li>2. Isolated development has a high potential for urban sprawl. If response is YES, result would be isolated development, high potential for unrestricted sprawl.</li> <li>3. Whether the parcel is well connected to the built up area and the degree of containment provided by the adjoining built up area. If parcel has two or less boundaries with urban area it has more potential to result in urban sprawl. If response is YES, area is poorly connected i.e. has few boundaries with the adjacent urban area, higher potential for unrestricted sprawl.</li> <li>4. 'Ribbon' development constitutes a continuous but shallow band of development form along roads between towns. If response is YES, higher potential for unrestricted sprawl.</li> <li>5. The potential for rounding-off an existing built up area. If response is YES, development would not 'round off' the existing settlement, higher potential for unrestricted sprawl.</li> </ol>

**Criteria 1 - Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl?**

4.29 The strength of the existing green belt has a fundamental role in preventing unrestricted sprawl. Strongly defined landscape or hard infrastructure features alongside a regular built form boundary are likely to represent a strong green belt boundary in preventing urban sprawl. The assessment of this criterion will therefore be undertaken through an assessment of the physical boundary features and the strength of the built form boundary.

4.30 Boundary definition should reflect NPPF Paragraph 85, which states that Local Authorities should ‘define boundaries clearly, using physical features which are readily recognisable and likely to be permanent’. Boundary identification reflects this national requirement:

**Table 2 - Defensible Boundaries**

<p><b>Defensible Boundary</b></p> <p>Durable/ ‘Recognisable and likely to be Permanent’ Features</p>	<p>Infrastructure: Motorway; public and made roads or strongly defined footpath/track; a railway line; river; Landform: Stream, canal or other watercourse; prominent physical features (e.g. ridgeline); protected woodland/hedge; existing development with strongly established, regular or consistent boundaries.</p>
<p><b>Indefensible Boundary</b></p> <p>Features lacking in durability/ Not readily recognisable or likely to be permanent</p>	<p>Infrastructure: private/ unmade roads; power lines; development with weak, irregular, inconsistent or intermediate boundaries. Natural: Field Boundary including dry stone walls, fencing etc; Tree line (unprotected under statutory instruments e.g. TPO, Ancient Woodland etc)</p>

4.31 The function of the existing green belt parcel in preventing sprawl, which would not otherwise be restricted by a barrier, will also be considered through the extent to which the existing built form has strongly established or recognisable boundaries:

- Strong existing built form boundaries comprise ‘strongly established’, ‘regular’ or ‘consistent’ built form comprises well-defined or rectilinear built form edges which would restrict growth within the green belt;



- Weak existing built form boundaries comprise 'Irregular', 'inconsistent' or 'intermediate' built form comprises imprecise or 'softer' boundaries, which would not growth within the green belt.

**Question 7: Do you agree with how the Council has defined the strength of existing boundaries for assessing Criteria 1?**

**Criteria 2 - Would development of parcel result in an isolated development site not connected to existing boundaries?**

4.32 Green belt should function to protect open land which is contiguous, connected to or in close proximity with the 'large built-up areas' defined previously. 'Open land' in this instance is considered to be land which is devoid of or generally lacking development. Parcels will be assessed against their proximity to the relevant the large built up area. This is because development of a green belt parcel not connected to a settlement within the hierarchy and not within close proximity would likely result in an isolated development with a higher potential for urban sprawl than land adjoining or in close proximity to the built up area.

4.33 Definitions of the extent to which the role of the green belt is protecting 'open land' surrounding large built-up areas is as follows:

- **'Contiguous'**: This represents land which is highly contained within the existing built form of the 'large built up area'. Development of this land is likely to result in a natural rounding off of the urban form, which will be dependent on the scale of the parcel and the size of settlement, and what is deemed the most appropriate in regards to rounding off the settlement. Parcels assessed as contiguous are likely to be assessed as weakly performing against this criterion as development of the parcel would be less likely to result in unrestricted sprawl.
- **'Connected to and in close proximity'**: This represents land which displays low levels of containment within the existing urban form of the 'large built up area'. This may also include land which is connected to the large built up area but which is separated by a strong infrastructure boundary. Parcels assessed as 'connected to and in close proximity' are likely to be assessed as strongly performing against this criterion, but may have the potential to incorporate mitigation to overcome any issues identified through the assessment.
- **'Connected to but not in close proximity'**: All green belt within Bradford District is considered to be connected in some way to the overall green belt boundary, however if a parcel is not in close proximity to the 'large built up area', it is likely development of the parcel would result in isolated development and thus is more likely to result in unrestricted sprawl. Therefore

parcels assessed as 'connected to but not in close proximity' are likely to be assessed as strongly performing against this criterion, with little or no potential for incorporating mitigation.

***Question 8: Do you agree with how the Council has defined how the development of a green belt parcel would result in an isolated development site not connected to existing boundaries?***

**Criteria 3 - Is this green belt parcel only connected by two or less boundaries to the built up area?**

4.34 For this criteria parcels will be assessed in regards to the degree of containment provided by an adjoining large built up area (settlements defined within hierarchy). If a parcel is well connected (i.e. has several boundaries) to an urban area, there will be a lower potential for urban sprawl. Development of a highly contained parcel is less likely to harm the strategic function of the green belt in restricting urban sprawl. A parcel with only two or less boundaries with an existing built up area will not be as well related and has more potential to result in unrestricted sprawl.

***Question 9: Do you agree with how the Council has defined how a green belt parcel only connected by two or less boundaries to the built up area in Criteria 3?***

**Criteria 4 - Would development of the parcel lead to / constitute ribbon development?**

4.35 Ribbon development is identified as the building of houses along a main road, especially one leading out of a town or village (Oxford Dictionary Online). Generally, the dispersed nature of settlements within the green belt means that the effects of ribbon development are fairly limited.

4.36 Nevertheless, it is important to retain the pattern of settlements through restricting further ribbon development. 'Ribbon Development' is therefore defined as built form which could perceptibly reduce the degree of separation between settlements

4.37 Parcels will be assessed against whether the current green belt boundary restricts 'Ribbon' development, which constitutes a continuous but shallow band of development form along roads leading away from a settlement. Using this methodology, green belt boundaries will be assessed for their role in preventing linear development along roads and thus preventing 'merging'. Parcels assessed as restricting ribbon development are likely to be assessed as strongly performing

against this criterion as development of the parcel would be more likely to result in unrestricted sprawl.

***Question 10: Do you agree with how the Council has defined role of the green belt in preventing continuous ribbon development unrestricted sprawl?***

**Criteria 5 - Would development of the parcel create an irregular settlement pattern?**

4.38 For this criteria parcels will be assessed in regards to whether development of the parcel would consolidate (or round off) the current development pattern of the large built up area. Development of a parcel which would round off an existing urban area is less likely to harm the strategic function of the green belt in restricting urban sprawl. If the response is yes, development of a parcel would create an irregular settlement pattern and not 'round off' an existing large built up area and will therefore have a higher potential for unrestricted sprawl. This will be dependent on the scale of the parcel and the size of settlement, and what is deemed the most appropriate in regards to rounding off the settlement. Parcels assessed as creating an irregular settlement pattern (not rounding off) are likely to be assessed as strongly performing against this criterion as development of the parcel would be more likely to result in unrestricted sprawl.

***Question 11: Do you agree with the Aims, Criteria and Assessment for Purpose 1 and how they have been applied? If no please give reasons.***

## **Purpose 2: To prevent neighbouring towns from merging into one another**

### **Overview and Background Research**

4.39 The PAS 'Planning on your Doorstep: The Big Issues Green Belt' (February 2015) guidance stipulates that 'a scale rule' approach to small settlements near to towns should not be applied as the identity of a settlement is not really determined just by the distance to another settlement. The guidance does however state that a 'landscape character assessment is a useful analytical tool for use in undertaking this type of assessment'.

4.40 The Council have reviewed the approach taken by Local Authorities whom have recently undertaken green belt reviews or which have recently found-sound Local Plans have taken to addressing Purpose 2. Each Authority generally focussed their assessment on the following themes:

- Definition of 'Neighbouring Towns'
- Define whether the parcel is underdeveloped/sparsely developed by analysing the levels of built form, and determine the extent to which a strategic gap exists
- Define the role of the green belt in safeguarding intervisibility between settlements to avoid neighbouring towns merging
- Define the relative significance of 'separation' between settlements
- Define the strength of the existing boundary in preventing neighbouring towns from merging, which would not otherwise be prevented by a barrier
- Define the role of the green belt in preventing continuous ribbon development causing neighbouring towns to merge.

### **Applying Purpose 2**

4.41 Under the second purpose green belt performs a role in protecting gaps or spaces between settlements in order to prevent coalescence. The proposed approach for Purpose 2 seeks to assess the strength of the existing green belt boundary in preventing development which would result in the merging of gaps between neighbouring towns.

### Definition of ‘Neighbouring Towns’

- 4.42 Purpose 2 makes reference to merging of neighbouring ‘towns’. To adequately undertake the ‘Green Belt Review’ it is necessary to determine what constitutes a town.
- 4.43 The Core Strategy establishes the settlement hierarchy for the Bradford District, consisting of the Regional City, Principal Towns, Local Growth Centres and Local Centres. For Purpose 2 of the ‘Green Belt Review’, the settlements listed within the hierarchy in combination with other villages ‘washed over’ by green belt within the District will be used to assess the merging of towns. While it is recognised that most of the settlements in settlement hierarchy would not normally be defined as ‘towns’, it is considered justified to use a broader interpretation under this purpose, given the particular nature and extent of green belt change proposed in the District. A complete list of settlements is listed within Table 3 below:

**Table 3 – Neighbouring Towns**

<b>Regional City</b>	<b>Principal Towns</b>	<b>Local Growth Centre</b>	<b>Local Centres</b>	<b>Villages within the green belt not defined within the Settlement Hierarchy</b>
City of Bradford	Keighley Ilkley Bingley	Burley-in-Wharfedale Menston Queensbury Steeton Silsden Thornton	Addingham Baildon Cottingley Cullingworth Denholme East Morton Harden Haworth Oakworth Oxenhope	Stanbury Cross Roads Oldfield Riddlesden West Morton Burley Woodhead Laycock Brunthwaite, Keelham Denholme

			Wilsden	Gate Laycock Esholt Micklethwaite Goose Eye Hainworth Tong Harecroft
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**Question 12: Do you agree with how the Council has defined 'Neighbouring Towns'?**

**Definition of Merging**

- 4.44 It is difficult to define a minimum distance which should be determined between settlements, as applicable gaps between settlements will differ on a case by case basis. Therefore the important consideration is to assess this purpose in a pragmatic way and to judge the extent to which development of a parcel would result in settlements merging with each other.

**Neighbouring Authorities and Duty to Cooperate**

- 4.45 In addition, there are instances where a 'town' or a settlement of a similar scale within a neighbouring Local Authority borders or adjoins a settlement within Bradford District. It is therefore appropriate to tailor the interpretation of purpose 2 to capture all settlements within the within 5km of the Bradford green belt boundary. The 5km radius is drawn from the edge of the 'inset' CBMDC green belt boundary and the assessment considers the closest settlements in all directions up to 5km.

**Table 4 – Purpose 2 Assessment Criteria**

Purpose 2	Aim	Criteria	Assessment
<p>To prevent neighbouring towns from merging</p>	<ul style="list-style-type: none"> <li>• The parcel resists development that would result in merging, coalescence or significant erosion, both physical or visually of a valued gap between neighbouring settlements within the District.</li> <li>• Existing green belt boundary has resisted ribbon development which would otherwise have resulted in the reduction of perceived separation between settlements.</li> </ul>	<ol style="list-style-type: none"> <li>1. Is the parcel 'Predominantly Rural Character'? YES/NO</li> <li>2. Is there visibility between neighbouring towns? YES/NO</li> <li>3. Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for merging of neighbouring towns? YES/NO</li> <li>4. Would the loss of this green belt land lead to a significant reduction in the distance between, or the physical connection of neighbouring urban areas (including areas beyond the District boundary)? YES/NO</li> <li>5. Would the loss of this green belt land potentially lead to ribbon development between towns? YES/NO</li> </ol>	<ol style="list-style-type: none"> <li>1. 'Ruralness' of land use; If response is YES, the parcel will perform a stronger role in safeguarding the open character of greenbelt land separating towns.</li> <li>2. Inter-visibility across the green belt. If response is YES, parcel more likely to perform a role in preventing neighbouring towns from merging.</li> <li>3. A strong defensible boundary is more likely to perform a role in preventing neighbouring urban areas from merging. If response YES, area more likely to perform a role in preventing neighbouring towns from merging.</li> <li>4. The existing width of the green belt and the impact development would have on the function of the green belt in that area. If response is YES, high potential for merging.</li> <li>5. Whether the site prevents continuous ribbon development along transport routes that link towns. If response is YES, higher potential for merging.</li> </ol>

### **Criteria 1 – Is the parcel Predominantly Rural Character?**

- 4.46 For this criteria parcels will be assessed in regards to whether the parcel is underdeveloped/sparsely developed by analysing the levels of built form, and the extent to which a gap exists between settlements.
- 4.47 The level of built form within the parcel will be identified to assess whether a perceived strategic gap between settlements exists and to assess whether the release of the parcel would damage the substantial open character of the green belt separating towns and villages. The level of built form within the parcel will be identified using a built form character assessment of buildings and other ‘man-made’ structures as a proportion of the parcel. This will be undertaken through a qualitative analysis using a combination of site visits and aerial photography/mapping data.
- 4.48 Following the analysis of built form, the parcel will then be categorised as either:
- **Predominantly Rural Character** - A parcel where there is a general lack of built form and which is mostly characterised by rural land uses, such as agricultural, outdoor sport and recreational facilities, cemeteries and other ‘open’ uses of land or where there is sporadic built form and a limited number of man-made structures however this is largely linked to rural land uses.
  - **Predominantly Urban Character** - A parcel for which there a semi-urban character with apparent levels of ‘non green belt uses’.
- 4.49 Qualification will be necessary at this stage as there maybe a number of green belt uses which strongly impact on the openness of the parcel. Where the parcel is classed as having a Predominately Rural Character, the parcel will be assessed as strongly performing under Criteria 1 of Purpose 2.

***Question 13: Do you agree with how the Council has defined parcel as Predominately Rural or Predominately Urban in character by analysing the levels of built form?***

### **Criteria 2 - Is there visibility between Neighbouring Towns as defined in Table 3?**

- 4.50 Parcels will be assessed to examine to whether they are safeguarding intervisibility between settlements, and thus performing the green belt function of avoiding neighbouring towns merging. Consideration will be given to the potential for merging of neighbouring settlement edges as well as distinct settlement areas which might be defined as towns. In essence, the purpose seeks to avoid coalescence of built-up areas.



- 4.51 The interpretation of 'merging', in terms of geographic distances, differs according to the relevant settlement. Whilst a review of neighbouring towns might need to account for distances over several miles, settlements at a smaller scale may have intervisibility that spans a considerably shorter distance.
- 4.52 The extent to which the parcel fits with the existing settlement is a determinant of whether or not there is potential for increasing the likelihood of the future coalescence with the next nearest settlement edge. The test of intervisibility will be used to determine whether, if the land was removed and developed, there would be potential views of the next nearest settlement edge, which would reduce the sense of openness in the green belt.

***Question 14: Do you agree with how the Council has defined whether there is visibility between Neighbouring Towns within Criteria 2?***

**Criteria 3 - Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for merging of neighbouring towns?-**

- 4.53 This criteria is defined in detail in paragraphs 4.29 – 4.31 and Table 1.

***Question 15: Do you agree with how the Council has defined the strength of existing boundaries?***

**Criteria 4 - Would the loss of this green belt land lead to a significant reduction in the distance between, or the physical connection of neighbouring urban areas (including areas beyond the District boundary)?**

- 4.54 The PAS 'Planning on your Doorstep: The Big Issues Green Belt' (February 2015) guidance stipulates that 'a scale rule' approach to identify the role of green belt in preserving the setting of a small settlement near to towns should not be applied as the identity of a settlement is not always determined just by the distance to another settlement. The guidance does however state that a 'landscape character assessment is a useful analytical tool for use in undertaking this type of assessment. The assessment will therefore comprise the assessment of physical, visual and perceptual scale of the gap (in the **landscape context, visual context and perceptual context**). Using the Landscape Character Assessment of Bradford District Supplementary Planning Document (SPD) (2008) and professional inputs from the Council's Landscape Architects, the methodology for assessing these concepts and defining the significance of each gap will be undertaken as follows:

- Review the Landscape Character SPD and the relevant volume to the settlement;
- Undertaking desk and site visit based review of the land gap to assess the physical separation between settlements within Table 3. Based on these elements, professional judgement will be used to identify the extent to which a parcel of green belt protects a valued gap.

4.55 The extent to which a parcel of green belt protects a valued gap between any of the settlements set out in Table 3 will be assessed using the following criteria:

- **Essential Gaps** – A land gap between two or more settlements where any development of the parcel would significantly reduce the perceived or actual distance between settlements. Parcels assessed as ‘essential gaps’ are likely to be assessed as ‘Strongly Performing’ against this criterion as development of the parcel would be likely to result in merging of neighbouring towns.
- **Largely Essential or Wide Gap** – A land gap between two or more settlements where the overall openness and scale of the gap is important to the restricting merging or protecting other gaps involving green belt Settlements, but where limited development may be possible. Parcels assessed as largely ‘essential or wide gaps’ are likely to be assessed as Strongly Performing (Potential Mitigation)’ against this criterion as development of the parcel would be likely to result in merging of neighbouring towns, but may have the potential to incorporate mitigation to overcome any issues identified through the assessment.
- **Less Essential Gaps** – A land gap between settlements where development may be possible without significant risk of merging of settlements. Parcels assessed as ‘less essential gaps’ are likely to be assessed as ‘Weakly Performing’ against this criterion as development of the parcel would be less likely to result in merging of neighbouring towns.

***Question 16: Do you agree with how the Council has defined the relative significance of separation between settlements?***

**Criteria 5 - Would the loss of this green belt land potentially lead to ribbon development between towns?**

- 4.56 The proliferation of ribbon development is clearly a potential threat to the physical separation of settlements. Ribbon development is identified as the building of houses along a main road, especially one leading out of a town or village (Oxford Dictionary Online). Generally, the dispersed nature of settlements within the green belt means that the effects of ribbon development are fairly limited.
- 4.57 Nevertheless, it is important to retain the pattern of settlements through restricting further ribbon development. 'Ribbon Development' is therefore defined as built form which could perceptibly reduce the degree of separation between settlements
- 4.58 The parcels will be assessed to whether the current green belt boundary restricts 'Ribbon' development, which constitutes a continuous but shallow band of development form along main roads between towns. Using this methodology, green belt Boundaries will be assessed for their role in preventing linear development along access route and thus preventing 'merging'.

***Question 17: Do you agree with how the Council has defined the role of the green belt in preventing continuous ribbon development causing neighbouring towns to merge?***

***Question 18: Do you agree with the Aims, Criteria and Assessment for Purpose 2 and how they have been applied?***

## **Purpose 3: To assist in safeguarding the countryside from encroachment**

### **Overview and Background Research**

- 4.59 National Policy and Guidance does not specify what constitutes 'countryside', 'safeguarding' or 'encroachment' in the context of the countryside. The PAS 'Planning on your Doorstep: The Big Issues Green Belt' (February 2015) guidance interprets this purpose as the 'difference between urban fringe and open countryside' with a need to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.
- 4.60 The Council have reviewed the approach taken by Local Authorities whom have recently undertaken green belt reviews or which have recently found-sound Local Plans have taken to addressing Purpose 3. The Council have concentrated on defining the following themes:
- Definition of the terms 'Openness', 'Countryside' and 'Encroachment' in relation to green belt;
  - Analyse the extent to which Openness and Key Features could be considered as features which are fundamental to the appreciation of the Countryside;
  - Following the definition of key features of the 'Countryside' and the sensitivity to encroachment, assess the role the green belt has in protecting openness, by analysing the level of built form within each parcel, and determine the extent to which this role has been impacted by encroachment; and,
  - Define if a defensible boundary between the existing urban area and the parcel.
  - Define if the land provides public access to the countryside (footpaths, bridleways) or outdoor sport/recreation use (designated park, outdoor sport)

### **Applying Purpose 3**

- 4.61 Most reviews analysed the 'character' of the green belt based on the level of existing built form, minus beneficial or countryside uses, within the area. Where there was limited differentiation in levels of development in parcels, the green belt was then assessed for its sensitivity and tolerance to change.
- 4.62 The latter assessment theme does acknowledge that the quality of the landscape is not a reason for designating land as green belt, but seeks to assess the sensitivity of land to encroachment. This will support the

search for the most appropriate location for the release of green belt for development.

**Definition of the terms ‘Openness’, ‘Countryside’ and ‘Encroachment’ in relation to green belt**

4.63 This purpose assesses the extent to which the green belt safeguards the countryside. It is generally accepted that the countryside is enjoyed for its openness and the ability to appreciate rural characteristics. Therefore:

- Countryside: Open land characterised by an absence of built form and urbanising influences, which is generally enjoyed for its openness and ability to appreciate rural characteristics.
- Openness: Refers to the extent to which green belt land could be considered open from an absence of built form and urbanising influences, rather than from a landscape character sense.
- Encroachment: A gradual advance beyond usual or acceptable limits’ (Oxford Dictionary Online).

***Question 19: Do you agree with how the Council has defined the terms ‘Openness’, ‘Countryside’ and ‘Encroachment’ in relation to green belt?***

4.64 Following the definition of key terms, the local Interpretation of Purpose 3 is therefore based on a two stage process: analysis of the ‘sensitivity’ of key features of the landscape to encroachment, followed by the extent to which built form has impacted these features.

**Table 5 – Purpose 3 Assessment Criteria**

Purpose 3	Aim	Criteria	Assessment
To safeguard the Countryside from Encroachment	Sensitivity of the green belt and features important to the appreciation of the countryside to change	<p>1. Does the parcel have a high or medium sensitivity to encroachment? YES/NO</p> <p>2. Does the parcel include national or local nature conservation designated areas (SPA/SAC/SEGI/SSSIs/LNR/BWA)? YES/NO</p> <p>3. Does the land provide public access to the countryside (footpaths, bridleways) or outdoor sport/recreation use (designated park, outdoor sport)? YES/NO</p>	<p>1. Special Landscape character or other designation; If response is YES, the parcel will perform a role in safeguarding the countryside from encroachment.</p> <p>2. Ecological and geological conservation value; If response is YES, the parcel will perform a role in safeguarding the countryside from encroachment.</p> <p>3. Public access and recreation facilities providing access to the countryside for the urban population. If response is YES, parcel will perform a role in safeguarding the countryside from encroachment.</p>
	Levels of Encroachment into the Countryside	<p>4. Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for encroachment into the countryside? YES/NO</p> <p>5. Does the parcel have a Predominantly Rural Character? YES/NO</p>	<p>4. The presence of strong physical boundaries separating open countryside from the built up area; If response is YES, there is an existing defensible boundary between the existing settlement/urban area safeguarding the countryside from encroachment</p> <p>5. 'Ruralness' of land use; If response is YES, the site will perform a role in safeguarding the countryside from encroachment.</p>

**Criteria 1 - Does the parcel have a high or medium sensitivity to encroachment?**

- 4.65 The extent to which Openness and Key Features are considered as features which are fundamental to the appreciation of the Countryside. Whilst the PAS guidance on green belt reviews issued in 2014 does state that a 'Green Belt Review is not an assessment of landscape quality', a number of recent studies have assessed the extent to which openness and key features could be considered as features which are fundamental to an appreciation of the countryside. Analysis of key land features will allow for distinction of the sensitivity of key features of the countryside, and if there are any at all, to encroachment.
- 4.66 It should be noted that it is not the role of the 'Green Belt Review' to undertake a landscape sensitivity assessment which is of comparable detail to the Landscape Character Capacity Assessment SPD. The proposed approach will be to undertake a broad high level assessment of the landscape sensitivity of the green belt parcel. Therefore the assessment of the sensitivity of the green belt landscape to development undertaken at this stage should not be used for any other purpose than informing the assessment of this green belt purpose. Table 6 below represents the approach to assessing green belt sensitivity to encroachment. Site visits, existing landscape evidence and officer's professional judgement will be used to assess the sensitivity of the green belt landscape to encroachment, based on the criteria in Table 6.

**Table 6 – Landscape Features Assessment Criteria**

Sensitivity to Countryside Encroachment	Landscape Features for Assessment
<b>High</b>	<ul style="list-style-type: none"> <li>• Strong Landscape Structure, characteristics, patterns, balanced combination of landform and land-cover;</li> <li>• No / Few detracting features;</li> <li>• Presence of considerable natural / semi-natural vegetation which is characteristic of that landscape type;</li> <li>• High visual sensitivity;</li> </ul>
	<p>Parcels assessed as <b>‘High Sensitivity’</b> are likely to be assessed as <b>‘Strongly Performing’</b> against this criterion as parcel is likely to be safeguarding the countryside from encroachment .</p>
<b>Medium</b>	<ul style="list-style-type: none"> <li>• Recognisable Landscape Structure, characteristic patterns, balanced combination of landform and land-cover are still evident, but occasionally masked by land use;</li> <li>• Some detracting features;</li> <li>• Presence of some natural / semi-natural vegetation which is characteristic of that landscape type;</li> <li>• Medium visual sensitivity</li> </ul>
	<p>Parcels assessed as <b>‘Medium Sensitivity’</b> are likely to be assessed as <b>‘Strongly Performing (Potential Mitigation)’</b> against this criterion as parcel is likely to be safeguarding the countryside from encroachment, but may also have the potential to incorporate mitigation to overcome any issues identified through the assessment.</p>
<b>Low</b>	<ul style="list-style-type: none"> <li>• Weak / damaged landscape structure, characteristic patterns of landform and land-cover are often masked by land use;</li> <li>• Frequent detracting features;</li> <li>• Lack of natural / semi-natural vegetation which is characteristic of that landscape type;</li> <li>• Low visual sensitivity</li> </ul>
	<p>Parcels assessed as <b>‘Low Sensitivity’</b> are likely to be assessed as <b>‘Weakly Performing’</b> against this criterion as parcel is not likely to be safeguarding the countryside from encroachment.</p>

***Question 20: Do you agree with the way the Council will analyse the extent to which Openness and Key Features could be considered as features which are fundamental to the appreciation of the Countryside?***



**Criteria 2 – Does the parcel include national or local nature conservation designated areas?**

- 4.67 Many ecology and biodiversity designations currently exist within the green belt, which act to conserve key protected species. These designations can include areas of moorland, forests / woodlands, wetlands, grassland for example, which provide key habitats to a plethora of animal, plants, insects and other species.
- 4.68 In these situations, the green belt is often performing a key function in safeguarding the ecology and biodiversity assets by preventing development within proximity of the designations, which could prove harmful to protect species.
- 4.69 For the purposes of this review, ecology and biodiversity designations are classed as the following designations:
- Special Protection Area (SPA)
  - Special Area of Conservation (SAC)
  - Sites of Special Scientific Interest (SSSi)
  - Sites of Ecological/Geological Importance (SEGI)
  - Bradford Wildlife Area (BWA)
  - Local Nature Reserves (LNR)
  - Regionally Important Geological/Geomorphological Sites (RIGS)
  - SPA / SAC Buffer Zone A

***Question 21: Do you agree with the way the Council has defined whether the parcel includes national or local nature conservation designated areas?***

***Criteria 3 – Does the land provide public access to the countryside (footpaths, bridleways) or outdoor sport / recreation use designated park, outdoor sport)?***

- 4.70 National Policy and Guidance makes clear the importance of providing adequate provision for outdoor recreation and sport, much of which by necessity is located within the green belt. The PAS 'Planning on your Doorstep: The Big Issues Green Belt' (February 2015) guidance stipulates the urban fringe is often the nearest opportunity for outdoor recreation for large numbers of people in urban areas, if the land is publicly accessible. The NPPF also makes clear that once green belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the green belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation.
- 4.71 Parcels containing sports and recreation or which provide access to the countryside via public rights of way shall be regarded as likely to have

higher sensitivity to encroachment into the countryside and perform strongly against this criterion (Purpose 3).

***Question 22: Do you agree with the way the Council has defined if the land provides public access to the countryside (footpaths, bridleways) or outdoor sport/recreation use (designated park, outdoor sport etc)?***

**Criteria 4 – Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for encroachment into the countryside??**

4.72 This criteria is defined in detail in paragraphs 4.29 – 4.31 and Table 1.

***Question 23: Do you agree with how the Council has defined the strength of existing boundaries?***

**Criteria 5 – Does the parcel have a predominantly rural character -**

4.73 This criteria will be assessed by analysing the level of built form within each parcel, to determine the extent to which this role has been impacted by encroachment; The level of built form within the parcel will be identified using a built form character assessment of buildings and other 'man-made' structures as a proportion of the parcel. This will be undertaken through a qualitative analysis using a combination of site visits and aerial photography/mapping data.

4.74 Following the analysis of built form, the parcel will then be best attributed to one of the following criteria:

- **Predominantly Rural Character:** A parcel where there is a general lack of built form and is mostly characterised by rural land uses, such as agricultural uses, outdoor sport and recreational facilities, cemeteries and other 'open' uses of land. There is sporadic built form and a limited number of man-made structures however this is largely linked to rural land uses. Parcels assessed as 'predominately rural character' are likely to be assessed as strongly performing against this criterion as parcel is likely to be safeguarding the countryside from encroachment, but may also have the potential to incorporate mitigation to overcome any issues identified through the assessment.
- **Predominantly Urban Character:** A parcel for which there is a semi-urban character with apparent levels of 'non green belt uses'. A parcel assessed as predominantly urban character will be judged as weakly performing against this criterion.

- 4.75 Qualification is necessary at this stage as there maybe a number of green belt uses which strongly impact on the openness of the parcel.

***Question 24: Do you agree with the way the Council proposes to assess the role the green belt has in protecting openness, by analysing the level of built form within each parcel, and determine the extent to which this role has been impacted by encroachment?***

***Question 25: Do you agree with the Aims, Criteria and Assessment for Purpose 3 and how they have been applied?***

## **Purpose 4: Preserving the Setting and Special Character of Historic Towns**

### **Overview and Background Research**

- 4.76 Purpose 4 of the five national purposes of the green belt comprises the assessment of the extent to which the parcel preserves the setting and special character of historic towns.
- 4.77 The approach to assessing this purpose differs between Local Authorities. A number of Local Authorities have chosen to follow the PAS guidance from January 2014 which states that the assessment of this purpose relates to very few settlements in reality, due largely to the pattern of modern development that often envelopes historic towns. In practice, this has resulted in Local Authorities removing this purpose from the assessment.
- 4.78 However, other green belt reviews have adopted methodologies which assess the role which the green belt plays in preserving the historic core of settlements and the setting of key historic features (such as Conservation Areas and Listed Assets). This is considered to be more appropriate to the context in Bradford where as a result of its cultural and industrial heritage, there is a rich tapestry of historic building and features which contribute to the character of rural as well as its urban areas.

### **Applying Purpose 4**

- 4.79 The local application of Purpose 4 requires a review of the historic nature of settlements within the District, alongside an assessment of the settlement hierarchy to determine which settlements could be considered to represent a locally-defined 'historic town'.
- 4.80 The Council have taken the approach of using historical assets as a measure for assessing to whether green belt parcels are performing

Purpose 4. This approach has been taken due to the growth of settlements through the 20<sup>th</sup> and 21<sup>st</sup> Century and the historic fabric of settlements across the District becoming fragmented. This has resulted in settlements containing significant areas of historic value, but also areas of more modern development with little or no historic value. The Council will therefore assess the historically important features within and surrounding settlements, rather than classifying settlement themselves as historic towns.

- 4.81 The majority of settlements within the settlement hierarchy contain Conservation Areas and listed buildings, which are appraised in detail within Conservation Area Appraisals and Listed Building Statements. These documents will be the primary source of information when assessing the Purpose 4 at this stage of the review.
- 4.82 The proposed approach for assessing this purpose will be based on a detailed review of evidence base documents (e.g. conservation appraisals, listed building statements) associated with historic assets and through desk-based research to assess the contribution the green belt makes to these 'historic settlements'.
- 4.83 Assessment of this purpose will assume the application of two criteria as set out below. This assessment process does not replace the need for a more detailed and analysis of the potential heritage impacts which sites might require as part of the wider site assessment and selection process. The criteria below reflects the approach which other local authorities have pursued, with an analysis of the contribution the parcel makes to the preservation of the historic core of settlements, followed by the assessment the parcel makes toward preserving the setting of key historic assets.

**Table 7 – Purpose 4 Assessment Criteria**

Purpose 4	Aim	Criteria	Assessment
To preserve the setting and special character of historic towns	Green belt Parcel has a role in safeguarding the historic character of a heritage asset (s)	1. Does the parcel contain a designated heritage asset, to which the current green belt setting is key to safeguarding it's historic architectural characteristics? YES/NO	1. If response is YES, the parcel performs a role in preserving the special character of the heritage asset.
	Green belt Parcel has a role in safeguarding the historic character and setting of a heritage asset (s)	2. Does the parcel form part of the setting of a designated heritage asset, to which the current green belt setting is key to safeguarding it's historic architectural characteristics? YES/NO	2. The relationship between land being reviewed and designated heritage asset(s). If response is YES, the parcel contributes to preserving the setting of the heritage asset.

**Criteria 1 - Does the parcel contain a designated heritage asset, to which the current green belt setting is key to safeguarding it's historic architectural characteristics?**

- 4.84 Many heritage assets currently exist within the green belt, including standalone / clusters of listed buildings, country parks and conservation areas which extend beyond the boundary of the urban area.
- 4.85 In these situations, the green belt is often performing a key function in safeguarding the historic character of the heritage asset by preventing development within proximity of the building / land.
- 4.86 For the purposes of this review, heritage assets are classed as the following designations:
- UNESCO World Heritage Site
  - Conservation Areas
  - Grade I, II\* and II Listed Buildings
  - Registered Parks and Gardens
  - Ancient Monuments
  - Registered Historic Battlefields

***Question 26: Do you agree with the way the Council has defined whether the parcel contains a heritage asset?***

**Criteria 2 – Does the parcel form part of the setting of a designated heritage asset (World Heritage Site and Buffer Zone/Listed buildings/conservation areas/historic parks and gardens/Scheduled Monuments)?**

4.87 The setting of a heritage asset can often extend beyond the curtilage of the property / land which is designated and is key to its historic value. It is therefore important to assess to whether a parcel forms part of the setting of a heritage asset, even though the asset is not actually contain within the parcel itself. Many of the District's heritage assets were originally constructed within a rural / countryside setting, and even though the urban fabric has often impinged, much of the surrounding countryside still performs an important function in safeguarding the rural setting.

4.88 The Council's Conservation Officers will assess to whether the green belt Parcel forms part of the setting of a designated asset using the following evidence sources:

- Listed Building Statements
- Conservation Area Appraisals
- Saltaire World Heritage Site Management Plan
- Consultation with Historic England

***Question 27: Do you agree with the way the Council has defined whether the parcel forms part of the setting of designated heritage asset?***

***Question 28: Do you agree with the Aims, Criteria and Assessment for Purpose 4 and how they have been applied?***

## **Purpose 5: Approach to defining the extent to which green belt ‘assists in urban regeneration, by encouraging the recycling of derelict and other urban land’**

### **Overview and Background Research**

- 4.89 Local Planning Authority approaches to assessing the fifth green belt purpose vary substantially across green belt studies. The Bath and North East Somerset Green Belt Study (2013) recognises that green belt is considered to play an important role in recycling derelict and other urban land, by restricting the availability of greenfield sites. However, the extent to which the green belt functions in restricting the availability of Greenfield Sites is of greater importance in some areas than others.
- 4.90 Those Local Authorities which have chosen to consider the fifth purpose of the green belt have generally used the following criteria to assess the role of the green belt in supporting urban regeneration and supporting reuse of land as follows:
- Proximity of the green belt to identified regeneration areas.
  - Proximity of the green belt to areas identified as having development pressures.
  - Whether the release of the green belt would undermine the likelihood of brownfield or underdeveloped sites within the existing urban area coming forward; or,
  - The level of brownfield land available in a given settlement compared with the number of dwellings in the settlement.
- 4.91 Within these examples there was a division between LPAs which provided a scoring range for purpose 5 against those which did not offer a score or gave a neutral score for all green belt parcels.
- 4.92 One of the key problems for any study is providing causal and direct evidence to show either that green belt has resulted in specific urban or derelict sites to be taken up and developed or that it has the potential to do so. This is particularly problematic in areas such as Bradford where there are significant differences in land values, viability levels, and market characteristics between different areas.
- 4.93 A number of Local Authorities have decided to exclude purpose five from their assessments. Indeed, the advice note issued by PAS in January 2014 (updated in February 2015) suggests that the amount of land within urban areas that could be developed should already have been factored in before identifying that a green belt review was justified. Other Local Authorities considered that assessing this purpose requires too many assumptions, including whether that development would have otherwise occurred in the part of the green

belt being assessed and the implications of green belt release on Brownfield land within the urban area.

- 4.94 However, in the light of the importance of recycling derelict land within the District, its priority within the Core Strategy and the potential it has to secure regeneration, and enhance the social and economic aspects of sustainability it is considered that the Green Belt Review should include this purpose within the study. This also reflects the outcomes of other Local Plan examinations such as the Cheshire East Local Plan and other green belt reviews across the region (including Barnsley, Selby and Bath and North East Somerset green belt reviews).

## **Applying Purpose 5**

- 4.95 The proposed approach will be to assess the role which green belt parcels potentially play in assisting in urban regeneration, by encouraging the recycling of derelict and other urban land in the following way.
- 4.96 Firstly by assessing whether the parcel is located adjacent a settlement with high levels of implemented planning permissions on derelict or other urban land. A high level of implemented planning permissions in a settlement will provide an indication that the green belt surrounding that settlement has encouraged the recycling of urban land through the general restrictive nature of the green belt policy.
- 4.97 Secondly an assessment will be made as to the extent of deliverable or developable Previously Developed Land (PDL) sites (using the SHLAA and brownfield register) within the relevant settlement. Green belt parcels located adjacent a settlement with a high level of brownfield land available will perform a stronger role in encouraging the relying of brownfield land than a parcel located near a settlement with no deliverable brownfield land.
- 4.98 Thirdly an assessment will be made as to whether the green belt parcel is located adjacent to a regeneration priority area as detailed within the Core Strategy. These parcels will be considered to play a stronger role in assisting regeneration of that urban area.
- 4.99 Parcels satisfying (answering YES) two or more of the criteria will be considered 'Strongly Performing' or 'Strongly Performing (Potential Mitigation)'.
- 4.100 The proposed approach for assessing this purpose will be based on a detailed review of most reliable and up to date evidence and data available including the council's SHLAA, planning application data and the council's housing monitoring information.



4.101 The following summarises the proposed approach for assessing the role of the green belt in assisting regeneration.

**Table 8 – Purpose 5 Assessment Criteria**

<b>Purpose 5</b>	<b>Aim</b>	<b>Criteria</b>	<b>Assessment</b>
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Green belt Parcel has a role in assisting urban regeneration	1. Is the parcel located adjacent to a settlement with high levels of implemented planning permissions on derelict or other urban land? YES / NO	1. Whether the existing green belt has encouraged the reuse of brownfield land by limiting the availability of land outside the settlement. If response is YES, the parcel performs a strong role in assisting urban regeneration
		2. Is there a sufficient level of brown field sites within the settlement which are available and developable to deliver the housing allocation for the relevant settlement? YES/NO	2. The relationship between land being reviewed and sufficient number of available brownfield sites to deliver the settlement's housing target. If response is <b>YES</b> , the performs a strong role in assisting urban regeneration
		3. Is parcel located adjacent a Regeneration and Renewal Priority Area? (with the exception of the Holme Wood Urban extension in south East Bradford) YES/NO	3. The relationship between land being reviewed and regeneration area. If response is <b>YES</b> , the parcel performs a strong role in assisting urban regeneration

**Criteria 1- Is the parcel located adjacent to a settlement with high levels of implemented planning permissions on derelict or other urban land?**

- 4.102 The assessment of this criterion will test whether or not the green belt is encouraging the reuse / recycling of derelict and other urban land within the settlement, through examining the implementation rates on brownfield sites of the relevant settlement.
- 4.103 This will be based on research undertaken by the Council into the implementation rates of brownfield sites within each settlement, and in the case of the City of Bradford each quadrant, of the hierarchy (North West Bradford, North East Bradford, South-West Bradford and South East Bradford). The date range of this research is October 2005 (the plan start date of the Replacement Unitary Development) to November 2017. The start date of the research has been selected due to the fact the existing green belt, and any updates undertaken during the plan production, was last found sound and adopted upon adopted of the Replacement Unitary Development Plan in 2005.
- 4.104 The Council consider a high rate of implementation of planning permissions of brownfield sites as fifty per cent or higher and therefore any settlement found to have an implementation rate less than 50% will be consider to have a low rate of implementation.
- 4.105 The Council consider a high rate of implementation as a key indicator for whether the existing green belt has encouraged the reuse of brownfield land by limiting the availability of land outside the settlement (i.e. on green belt land) and therefore pushing development onto brownfield sites with resulting regeneration benefits.
- 4.106 Green belt parcels surrounding settlements with a 'high rate' (over 50%) of implemented planning permissions on brownfield sites will likely be assessed as strongly performing against this criterion. Green belt parcels with a 'low rate' (less than 50%) will likely be assessed as weakly performing against this criterion.

***Question 29: Do you agree with the way the Council has defined whether the parcel is located adjacent to a settlement with high levels of implemented planning permissions on derelict or other urban land?***

**Criteria 2 - Is there a sufficient level of brown field sites within the settlement which are available and developable to deliver the housing allocation for the relevant settlement?**

- 4.107 The assessment of this criterion will test whether there are a sufficient number of available and developable brownfield sites to deliver the applicable housing target for the relevant settlement. To ensure the

Council can assess whether the green belt parcels are performing the function of Purpose 5 by funnelling development towards brownfield sites within the settlement, there must be an assessment to whether there is sufficient derelict or other urban land within the settlement to recycle. The main evidence sources for assessing this will be the latest versions of Strategic Housing Land Availability Assessment (SHLAA 2015) and the Brownfield Register (2017).

- 4.108 Should there be sufficient deliverable and developable sites of derelict or other urban land available to deliver the housing allocation for the relevant settlement, green belt parcels will likely be assessed as strongly performing against this criterion. Should there be insufficient deliverable and development sites of derelict or other urban land, green belt parcels will likely performing a weak green belt function for this criterion.

***Question 30: Do you agree with the way the Council has defined whether there is a sufficient level of brown field sites within the settlement which are available and developable to deliver the housing allocation for the relevant settlement?***

**Criteria 3 - Is parcel located adjacent a Regeneration and Renewal Priority Area? (with the exception of the Holme Wood Urban extension in south East Bradford)**

- 4.109 The Core Strategy sets out a number of Urban Regeneration and Renewal Priority Areas within the City of Bradford (Policy BD1) and Airedale (Policy AD1). The regeneration and renewal priority areas are as follows:

1. City Centre
2. Canal Road Corridor
3. Shipley Town Centre
4. Leeds Bradford Corridor
5. Manningham
6. Little Horton
7. Allerton
8. Keighley
9. Bingley

- 4.110 The identified Urban Regeneration and Renewal Priority Areas are a key focus for new housing and economic development within urban areas through the prioritised reuse of derelict land. The Council consider the existing green belt has encouraged (and will continue to do so) the reuse of brownfield land by limiting the availability of land outside the settlement (i.e. on green belt land) and therefore

encouraging development onto brownfield sites within the Regeneration and Renewal Priority Area.

4.111 However, it is considered that there is one exception to this assessment criterion. This is the Holme Wood Urban Extension identified under adopted Core Strategy Policy HO2 and BD2, which forms part of the Leeds Bradford Corridor Regeneration and Renewal Priority Area. In this location comprehensive proposals involving both the more efficient use of existing land by remodelling existing areas of underused land, and linking built and open spaces more successfully have been combined with proposals for an urban extension. The combination of these proposals will secure significant funding for the improvement of the existing urban area. Therefore, it is considered that any future development of green belt adjacent this area will assist in urban regeneration and encourage the recycling of derelict and other urban land within Holme Wood and ensure the investment needed on the estate to make it sustainable for the future.

4.112 The principle of the Holme Wood Urban extension and greenbelt release in this location has been established through the Core Strategy. This approach is considered in accordance with NPPF paragraphs 84 and 85 as it takes account of the need to promote sustainable patterns of development and is consistent with the Core Strategy Local Plan strategy for meeting identified requirements for sustainable development.

4.113 Should a parcel be located adjacent to the regeneration and renewal priority area (with the exception of Holmewood), it will likely be assessed as strongly performing against this criterion. Should the parcel not be located adjacent to a regeneration and renewal priority area, it will likely performing a weak green belt function for this criterion.

***Question 31: Do you agree with the way the Council has defined whether the parcel is located adjacent a Regeneration and Renewal Priority Area (with the exception of the Holme Wood Urban extension in south East Bradford)?***

***Question 32: Do you agree with the Aims, Criteria and Assessment for Purpose 5 and how they have been applied?***

## Appendix 1 – Detailed Assessment Result Scenarios Matrix

Each Parcel Assessed Against the 5 Purposes	Parcel Assessment For Each Purpose	Results of Parcel Assessment for Each Purpose	Cumulative Results of the Parcel Assessment for Purposes 1 - 5
Purpose 1 - to check the unrestricted sprawl of large built-up areas	Parcel is assessed against the five criteria for Purpose 1	<p>Parcel is assessed as passing (answering YES) to 3 – 5 of the criteria for Purpose 1 <b>STRONGLY PERFORMING PURPOSE 1</b></p>	<p>Parcel is assessed as strongly performing 3 – 5 Purposes of Green Belt Function <b>PERFORMING A STRONG GREEN BELT FUNCTION</b>  <b>PARCEL CLASSED AS 'STRONGLY PERFORMING'</b></p>
		<p>Parcel is assessed as passing (answering YES) to 3 – 5 of the criteria for Purpose 1 but potentially capable of incorporating MITIGATION measures to off-set issues identified resulting from the assessment of 3 -5 criteria. <b>STRONGLY PERFORMING (Potential Mitigation) PURPOSE 1</b></p>	
		<p>Parcel is assessed as passing (answering YES) to 0 – 2 of the criteria for Purpose 1 <b>WEAKLY PERFORMING PURPOSE 1</b></p>	
		<p>Parcel is assessed as: Strongly Performing (answering YES) 2 Criteria, Strongly Performing (answering YES) 1 Criteria but potentially capable of incorporating mitigation measures, Weakly performing(answering NO) 2 Criteria <b>STRONGLY PERFORMING (Potential Mitigation) Purpose 1</b></p>	
		<p>Parcel is assessed as: Strongly Performing (answering YES) 2 Criteria, Strongly Performing (answering YES) 2 Criteria but potentially capable of incorporating mitigation measures, Weakly performing (answering NO) 1 Criteria <b>STRONGLY PERFORMING (Potential Mitigation) Purpose 1</b></p>	
		<p>Parcel is assessed as: Strongly Performing (answering YES) 1 Criteria, Strongly Performing (answering YES) 2 Criteria but potentially capable of incorporating mitigation measures, Weakly performing (answering NO) 2 Criteria <b>STRONGLY PERFORMING (Potential Mitigation) Purpose 1</b></p>	
<p>Parcel is assessed as strongly performing 3 – 5 Purposes of Green Belt Function <b>PERFORMING A STRONG GREEN BELT FUNCTION but is capable of incorporating POTENTIAL MITIGATION to off-set issues identified in 3 -5 Purposes.</b>  <b>PARCEL CLASSED AS 'STRONGLY PERFORMING (POTENTIAL MITIGATION)'</b></p>			

Purpose 2 - to prevent neighbouring towns merging into one another	Parcel is assessed against the five criteria for Purpose 2	Parcel is assessed as passing (answering YES) to 3 – 5 of the criteria for Purpose 1 <b>STRONGLY PERFORMING PURPOSE 2</b>	Parcel is assessed as:  Strongly Performing 2 Purposes  Strongly Performing 2 Purposes but could incorporate mitigation measures,  Weakly Performing 1 Purpose  <b>PARCEL CLASSED AS 'STRONGLY PERFORMING (POTENTIAL MITIGATION)'</b>
		Parcel is assessed as passing (answering YES) to 3 – 5 of the criteria for Purpose 2 <b>STRONGLY PERFORMING PURPOSE 2</b>	
		Parcel is assessed as passing (answering YES) to 0 – 2 of the criteria for Purpose 2 <b>WEAKLY PERFORMING PURPOSE 2</b>	
		Parcel is assessed as:  Strongly Performing (answering YES) 2 Criteria,  Strongly Performing (answering YES) 1 but potentially capable of incorporating mitigation measures,  Weakly performing (answering NO) 2 Criteria  <b>STRONGLY PERFORMING (Potential Mitigation) Purpose 2</b>	
		Parcel is assessed as:  Strongly Performing (answering YES) 2 Criteria,  Strongly Performing (answering YES) 2 Criteria but potentially capable of incorporating mitigation measures,  Weakly performing (answering NO) 1 Criteria  <b>STRONGLY PERFORMING (Potential Mitigation) Purpose 2</b>	
		Parcel is assessed as:  Strongly Performing (answering YES) 1 Criteria,  Strongly Performing (answering YES) 2 Criteria but potentially capable of incorporating mitigation measures,  Weakly performing (answering NO) 2 Criteria  <b>STRONGLY PERFORMING (Potential Mitigation) Purpose 2</b>	Parcel is assessed as:  Strongly Performing 2 Purposes,  Strongly Performing 1 Purpose but could incorporate mitigation measures,  Weakly performing 2 Purposes  <b>PARCEL CLASSED AS 'STRONGLY PERFORMING (POTENTIAL MITIGATION)'</b>
Purpose 3 - to assist in safeguarding the countryside from encroachment	Parcel is assessed against the five criteria for Purpose 3	Parcel is assessed as passing (answering YES) to 3 – 5 of the criteria for Purpose 3 <b>STRONGLY PERFORMING PURPOSE 3</b>	

		<p>Parcel is assessed as passing (answering YES) to 3 – 5 of the criteria for Purpose 1 but is potentially capable of incorporating MITIGATION measures to off-set issues identified resulting from the assessment of 3 -5 criteria.</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) PURPOSE 3</b></p>	<p>Parcel is assessed as:</p> <p>Strongly Performing 1 Purpose, Strongly Performing 2 Purposes but could incorporate mitigation measures, Weakly performing 2 Purposes</p> <p><b>PARCEL CLASSED AS 'STRONGLY PERFORMING (POTENTIAL MITIGATION)'</b></p>
		<p>Parcel is assessed as passing (answering YES) to 0 – 2 of the criteria for Purpose 1</p> <p><b>WEAKLY PERFORMING PURPOSE 3</b></p>	
		<p>Parcel is assessed as:</p> <p>Strongly Performing (answering YES) 2 Criteria, Strongly Performing (answering YES) 1 Criteria but potentially capable of incorporating mitigation measures, Weakly performing (answering NO) 2 Criteria</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) Purpose 3</b></p>	
		<p>Parcel is assessed as:</p> <p>Strongly Performing (answering YES) 2 Criteria, Strongly Performing (answering YES) 2 Criteria but potentially capable of incorporating mitigation measures, Weakly performing (answering NO) 1 Criteria</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) Purpose 3</b></p>	
		<p>Parcel is assessed as:</p> <p>Strongly Performing (answering YES) 1 Criteria, Strongly Performing (answering YES) 2 Criteria but potentially capable of incorporating mitigation measures, Weakly performing (answering NO) 2 Criteria</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) Purpose 3</b></p>	
<p>Purpose 4 - to preserve the setting and special character of historic towns</p>	<p>Parcel is assessed against the three criteria for Purpose 4</p>	<p>Parcel is assessed as passing (answering YES) to either criteria for Purpose 4</p> <p><b>STRONGLY PERFORMING PURPOSE 4</b></p>	

		<p>Parcel is assessed as passing (answering YES) to either criteria for Purpose 1 but is potentially capable of incorporating MITIGATION measures to off-set issues identified resulting from the assessment of either criteria.</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) PURPOSE 4</b></p>	
		<p>Parcel is assessed as not passing (answering NO) to either criteria for Purpose 4</p> <p><b>WEAKLY PERFORMING PURPOSE 4</b></p>	
		<p>Parcel is assessed as:</p> <p>Strongly Performing (answering YES) 0 Criteria, Strongly Performing(answering YES) 1 Criteria but potentially capable of incorporating mitigation measures, Weakly performing (answering NO) 1 Criteria</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) Purpose 4</b></p>	<p>Parcel is assessed as strongly performing 0 – 2 Purposes of Green Belt Function</p> <p><b>PERFORMING A WEAK GREEN BELT FUNCTION</b></p> <p><b>PARCEL CLASSED AS 'WEAKLY PERFORMING'</b></p>
		<p>Parcel is assessed as:</p> <p>Strongly Performing (answering YES) 1 Criteria, Strongly Performing (answering YES) 1 Criteria but potentially capable of incorporating mitigation measures, Weakly performing (answering NO) 0 Criteria</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) Purpose 4</b></p>	
<p>Purpose 5 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>Parcel is assessed against the criterion for Purpose 5</p>	<p>Parcel is assessed as passing (answering YES) to 2 – 3 of the criteria for Purpose 5</p> <p><b>STRONGLY PERFORMING PURPOSE 5</b></p> <p>Parcel is assessed as passing (answering YES) to 2 – 3 of the criteria for Purpose 5 but potentially capable of incorporating MITIGATION measures to off-set issues identified resulting from the assessment of 3 -5 criteria.</p> <p><b>STRONGLY PERFORMING (Potential Mitigation) PURPOSE 5</b></p> <p>Parcel is assessed as passing (answering YES) to 0 – 1 of the criteria for Purpose 1</p> <p><b>WEAKLY PERFORMING PURPOSE 5</b></p>	



Parcel is assessed as:

Strongly Performing (answering YES) 1 Criteria,

Strongly Performing (answering YES) 1 Criteria but potentially capable of incorporating mitigation measures,

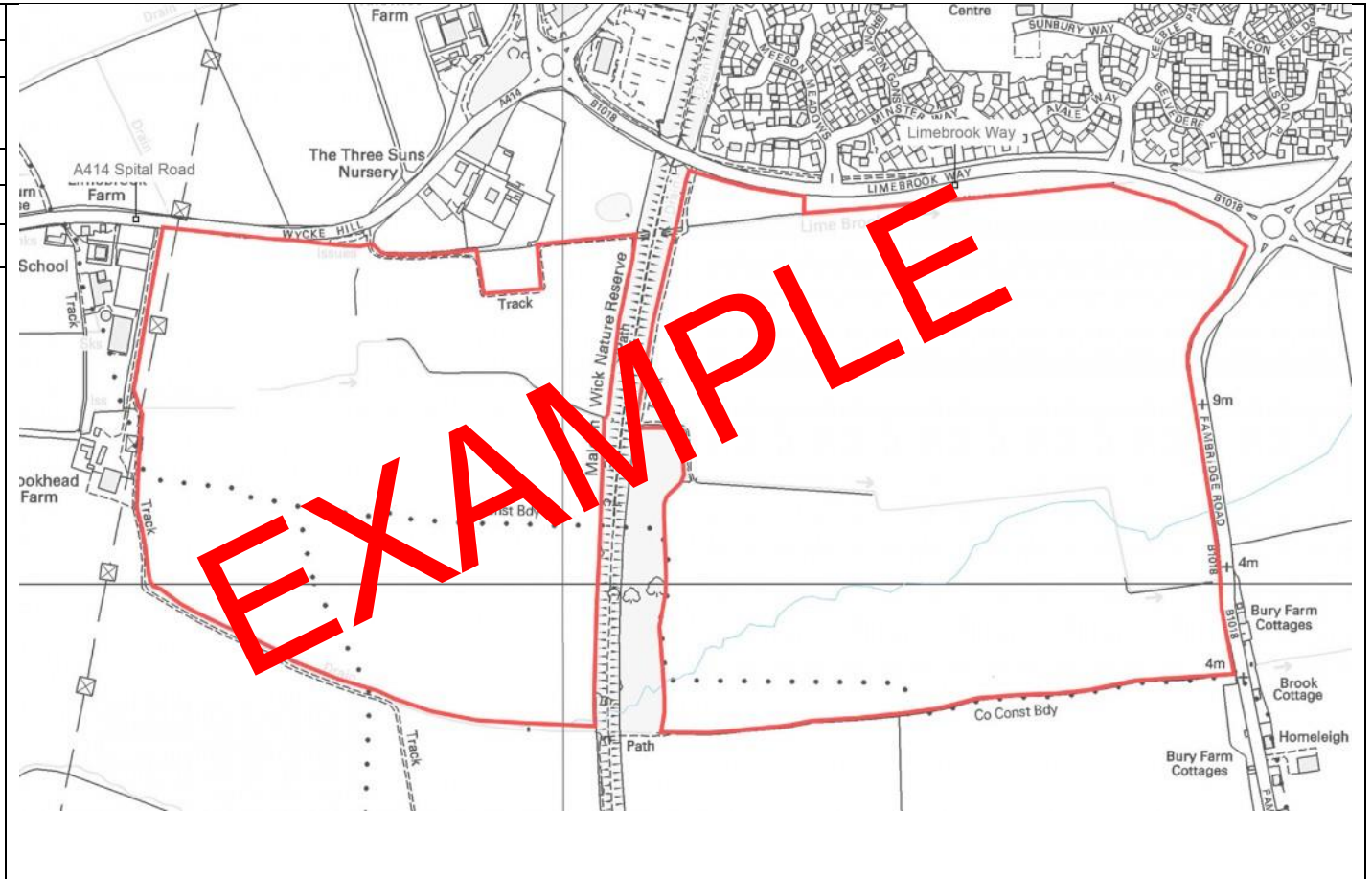
Weakly performing (answering NO) 1 Criteria

**STRONGLY PERFORMING (Potential Mitigation) Purpose 5**

## Appendix 2 – Green Belt Assessment Proforma

Date Desk Based Analysis Completed		Green Belt Function
Date of Site Visit		
Surveying Officer		
Checked By		

Parcel Reference	
Settlement	
Local Plan Core Strategy Area	
Ward	
OS Grid Reference	
Parcel Area (Ha)	



Green Belt Purpose	Assessment Criteria	Assessment Considerations	Assessment Analysis	Result
<b>1. Check unrestricted sprawl of large built up areas</b>	Purpose 1 seeks to assess the strength of the existing green belt boundary to determine the extent to which it is able to restrict 'sprawl' of large built up areas in the Bradford District. The assessment is based on the following criteria:			
	1. Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl? YES/NO	1. The presence and permanence of recognisable defensible boundaries that separate areas of land, such as roads, railways, watercourses, tree belts, woodlands. If response is YES, higher potential for unrestricted sprawl.	<div style="background-color: #cccccc; padding: 2px;"><b>Potential Mitigation</b></div>	
	2. Would development of the parcel result in an isolated development site not connected to existing boundaries? YES/NO	2. Isolated development has a high potential for urban sprawl. If response is YES, result would be isolated development, high potential for unrestricted sprawl.	<div style="background-color: #cccccc; padding: 2px;"><b>Potential Mitigation</b></div>	
3. Is this green belt parcel only connected by two or less boundaries to the built up area? YES/NO	3. Whether the parcel is well connected to the built up area and the degree of containment provided by the adjoining built up area. If parcel has two or less boundaries with urban area it has more potential to result in urban sprawl. If response is YES, area is poorly connected i.e. has few	<div style="background-color: #cccccc; padding: 2px;"><b>Potential Mitigation</b></div>		

		boundaries with the adjacent urban area, higher potential for unrestricted sprawl.		
	4. Would development of the parcel lead to/ constitute ribbon development? YES/NO	4. 'Ribbon' development constitutes a continuous but shallow band of development form along roads between towns. If response is YES, higher potential for unrestricted sprawl.		
			<b>Potential Mitigation</b>	
	5. Would development of the parcel create an irregular settlement pattern? YES/NO	5. The potential for rounding-off an existing built up area. If response is YES, development would not 'round off' the existing settlement, higher potential for unrestricted sprawl.		
			<b>Potential Mitigation</b>	
<b>Results Analysis</b>				
			<b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 1 (High potential for unrestricted sprawl)</b>	

			<b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 1</b> (The parcel (High potential for unrestricted sprawl) but is potentially capable of incorporating <b>MITIGATION</b> to off-set issues identified resulting from the assessment.	
			<b>PARCEL PERFORMING A WEAK GREEN BELT FUNCTION FOR PURPOSE 1</b> (Low potential for unrestricted sprawl)	
Green Belt Purpose	Assessment Criteria	Assessment Considerations	Assessment Analysis	Result
<b>2: To prevent neighbouring towns from merging</b>	Purpose 2 seeks to assess the strength of the existing green belt boundary in preventing development which would result in the merging of gaps between neighbouring towns. The assessment is based on the following criteria:			
	1. Is the parcel Predominantly Rural Character? YES/NO	1. 'Ruralness' of land use; If response is YES, the parcel will perform a role in safeguarding the open character of green belt land separating towns	<b>Potential Mitigation</b>	
	2. Is there visibility between neighbouring towns? YES/NO	2. Inter-visibility across the green belt. If response is YES, parcel more likely to perform a role in preventing neighbouring towns from merging.	<b>Potential Mitigation</b>	
	3. Does the existing boundary provide a strong defensible barrier between the existing	3. A strong defensible boundary is more likely to perform a role in preventing		

	urban area and undeveloped land, which if breached may set a precedent for merging of neighbouring towns? YES/NO	neighbouring urban areas from merging. If response yes, parcel more likely to perform a role in preventing neighbouring towns from merging.	<b>Potential Mitigation</b>	
	4. Would the loss of this green belt land lead to a significant reduction in the distance between, or the physical connection of neighbouring urban areas (including areas beyond the District boundary)? YES/NO	4. The existing width of the green belt and the impact development would have on the function of the green belt in that area. If response is YES, high potential for merging.	<b>Potential Mitigation</b>	
	5. Would the loss of this green belt land potentially lead to ribbon development between towns? YES/NO	5. Whether the site prevents continuous ribbon development along transport routes that link towns. If response is YES, higher potential for merging.	<b>Potential Mitigation</b>	
<b>Results Analysis</b>				
			<b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 2</b> (The parcel fulfils its purpose in preventing towns from merging)	

			<b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 2</b> (The parcel fulfils its purpose in preventing towns from merging) but is potentially capable of incorporating <b>POTENTIAL MITIGATION</b> to off-set issues identified resulting from the assessment.			
			<b>PARCEL PERFORMING A WEAK GREEN BELT FUNCTION FOR PURPOSE 2</b> (The parcel does not fulfil its purpose in preventing towns from merging)			
Green Belt Purpose	Assessment Criteria	Assessment Considerations	Assessment Analysis	Result		
<b>3. To safeguard the Countryside from Encroachment</b>	Purpose 3 assesses the extent to which the green belt safeguards the countryside. It is generally accepted that the countryside is enjoyed for its openness and the ability to appreciate rural characteristics. The assessment is based on the following criteria:					
	1. Does the parcel have a high or medium sensitivity to encroachment? YES/NO	1. Special Landscape character or other designation; If response is YES, the parcel will perform a role in safeguarding the countryside from encroachment.	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #cccccc; text-align: center;"><b>Potential Mitigation</b></td> </tr> <tr> <td style="height: 40px;"> </td> </tr> </table>		<b>Potential Mitigation</b>	
<b>Potential Mitigation</b>						

	<p>2. Does the parcel include national or local nature conservation designated areas (SPA/SAC/SEGI/SSSIs/LN R/BWA) YES/NO</p>	<p>2. Ecological and geological conservation value; If response is YES, the parcel will perform a role in safeguarding the countryside from encroachment.</p>	<p>Potential Mitigation</p>	
	<p>3. Does the land provide public access to the countryside (footpaths, bridleways) or outdoor sport/recreation use (designated park, outdoor sport) YES/NO</p>	<p>3. Public access and recreation facilities providing access to the countryside for the urban population. If response is YES, the parcel will perform a role in safeguarding the countryside from encroachment.</p>	<p>Potential Mitigation</p>	
	<p>4.. Does the existing boundary provide a strong defensible barrier between the existing urban area and undeveloped land, which if breached may set a precedent for encroachment into the countryside? YES/NO</p>	<p>4. The presence of strong physical boundaries separating open countryside from the built up area; If response is YES, there is an existing defensible boundary between the existing settlement/urban area safeguarding the countryside from encroachment</p>	<p>Potential Mitigation</p>	
	<p>5. Does the parcel have a Predominantly Rural Character? YES/NO</p>	<p>5. 'Ruralness' of land use; If response is YES, the parcel will perform a role in safeguarding the countryside from encroachment.</p>	<p>Potential Mitigation</p>	



Results Analysis				
			<b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 3</b> (The parcel fulfils its purpose in assisting in safeguarding the countryside from encroachment)	
			<b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 3</b> (The parcel fulfils its purpose in assisting in safeguarding the countryside from encroachment) but is potentially capable of incorporating <b>POTENTIAL MITIGATION</b> to off-set issues identified resulting from the assessment.	
			<b>PARCEL PERFORMING A WEAK GREEN BELT FUNCTION FOR PURPOSE 3</b> (The parcel does not fulfil its purpose in safeguarding the countryside from encroachment)	
Green Belt Purpose	Assessment Criteria	Assessment Considerations	Assessment Analysis	Result
<b>4. To preserve the setting and special character of historic towns</b>	Purpose 4 will assess of the extent to which the parcel preserves the setting and special character of historic towns. The assessment is based on the following criteria:			
	1. Does the parcel contain a designated heritage asset, to which the current green belt setting is key to safeguarding it's historic architectural characteristics? YES/NO	1. If response is YES, the parcel performs a role in preserving the special character of the heritage asset?		
			<b>Potential Mitigation</b>	

	<p>2. Does the parcel form part of the setting of a designated heritage asset, to which the current green belt setting is key to safeguarding it's historic architectural characteristics? YES/NO</p>	<p>2. The relationship between land being reviewed and designated heritage asset(s). If response is YES, the parcel contributes to preserving the setting of the heritage asset.</p>		
			<p><b>Potential Mitigation</b></p>	
<p><b>Results Analysis</b></p>				
			<p><b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 4</b> (The parcel fulfils its purpose of <b>preserving the setting and special character of historic towns</b> )</p>	
			<p><b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 4</b> (The parcel fulfils its purpose of <b>preserving the setting and special character of historic towns</b> ) but is potentially capable of incorporating <b>POTENTIAL MITIGATION</b> to off-set issues identified resulting from the assessment.</p>	
			<p><b>PARCEL PERFORMING A WEAK GREEN BELT FUNCTION FOR PURPOSE 4</b> (The parcel does not fulfil its purpose of <b>preserving the setting and special character of historic towns</b> )</p>	

Green Belt Purpose	Assessment Criteria	Assessment Considerations	Assessment Analysis	Result
<b>5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>				
	1. Is the parcel located adjacent to a settlement with high levels of implemented planning permissions on derelict or other urban land? YES / NO	1. The relationship between land being reviewed and a high level of implementation on derelict and other urban land. If response is <b>YES</b> , the parcel performs a strong role in assisting urban regeneration	<div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center; background-color: #cccccc; margin: 0;"><b>Potential Mitigation</b></p> </div>	
	2. Is there a sufficient level of brown field sites within the settlement which are available and developable to deliver the housing allocation for the relevant settlement? YES/NO	2. The relationship between land being reviewed and sufficient number of brownfield sites to deliver the settlement's housing allocation. If response is <b>YES</b> , the parcel performs a strong role in assisting urban regeneration	<div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center; background-color: #cccccc; margin: 0;"><b>Potential Mitigation</b></p> </div>	
	3. Is parcel located adjacent a Regeneration and Renewal Priority Area? (with the exception of the	3. The relationship between land being reviewed and regeneration area. If response is <b>YES</b> , the parcel does	<div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center; background-color: #cccccc; margin: 0;"><b>Potential Mitigation</b></p> </div>	

	Holme Wood Urban extension in south East Bradford) YES/NO	perform a strong role in assisting urban regeneration		
<b>Results Analysis</b>				
		<b>PARCEL PERFORMING A STRONG GREEN BELT FUNCTION FOR PURPOSE 5</b> (The parcel fulfils its purpose in assisting in urban regeneration by encouraging the recycling of derelict and other urban land)		
		<b>PARCEL PERFORMING A WEAK GREEN BELT FUNCTION FOR PURPOSE 5</b> (in assisting in urban regeneration by encouraging the recycling of derelict and other urban land) but is potentially capable of incorporating <b>POTENTIAL MITIGATION</b> to off-set issues identified resulting from the assessment.		
		<b>PARCEL PERFORMING A WEAK GREEN BELT FUNCTION FOR PURPOSE 5</b> (in assisting in urban regeneration by encouraging the recycling of derelict and other urban land)		
<b>OVERALL CONCLUSION FROM ASSESSMENT AGAINST ALL 5 PURPOSES OF GREEN BELT</b>				
		<b>PERFORMING A STRONG GREEN BELT FUNCTION PARCEL</b>		
		<b>PERFORMING A STRONG GREEN BELT FUNCTION PARCEL</b> but is potentially capable of incorporating <b>POTENTIAL MITIGATION</b> to off-set issues identified resulting from the assessment.		
		<b>PERFORMING A WEAK GREEN BELT FUNCTION PARCEL</b>		