

LIST OF MODIFICATIONS

UDP – Policy Framework Chapter 3 Principal Policies

Mod Ref UDP Ref Site Ref IR Page No.	Existing UDP Wording – 1st Deposit (June 2001) or Revised Deposit (July 2002) (<i>whichever is the latest approved by Council</i>)	Proposed Modification	Reason for Modification
<p>MOD – Mod/PF/PP/1</p> <p>UDP – Policy UDP1 Promoting Sustainable Patterns of Development, Policy Framework</p> <p>IR – Policy Framework, Paragraphs 3.4-3.8, Pages 7- 8</p>	<p>“UDP1 THE LOCATION OF DEVELOPMENT TO MEET THE NEEDS OF THE DISTRICT WILL BE MADE BY</p> <p>(1) FOCUSsing ON THE URBAN AREAS</p> <p>(2) ENCOURAGING THE MOST EFFECTIVE USE OF BROWNFIELD SITES AND BUILDINGS</p> <p>3) CONCENTRATING DEVELOPMENT IN AREAS WITH GOOD PUBLIC TRANSPORT LINKS</p> <p>(4) CONCENTRATING DEVELOPMENT IN AREAS WITH PROXIMITY TO ESSENTIAL AND WIDER FACILITIES AND SERVICES</p> <p>(5) MAKING MOST APPROPRIATE AND EFFECTIVE USE OF SITES CARRIED FORWARD FROM THE CURRENT DEVELOPMENT PLAN</p> <p>(6) PHASING THE RELEASE OF LAND FOR HOUSING DEVELOPMENT”</p>	<p>“UDP1 THE LOCATION OF DEVELOPMENT TO MEET THE NEEDS OF THE DISTRICT WILL BE MADE BY</p> <p>(1) FOCUSsing ON THE URBAN AREAS</p> <p>(2) ENCOURAGING THE MOST EFFECTIVE USE OF BROWNFIELD SITES AND BUILDINGS</p> <p>3) CONCENTRATING DEVELOPMENT IN AREAS WITH GOOD PUBLIC TRANSPORT LINKS</p> <p>(4) CONCENTRATING DEVELOPMENT IN AREAS WITH PROXIMITY TO ESSENTIAL AND WIDER FACILITIES AND SERVICES</p> <p>(5) MAKING MOST APPROPRIATE AND EFFECTIVE USE OF SITES CARRIED FORWARD FROM THE CURRENT DEVELOPMENT PLAN</p> <p>(6) (5) PHASING THE RELEASE OF LAND FOR HOUSING DEVELOPMENT”</p>	<p>For the reasons set out in the Inspector’s Report</p>
<p>MOD - Mod/PF/PP/2</p> <p>UDP – Policy Framework, Para 3.7A</p> <p>IR – Policy Framework, paragraphs 3.9-3.12, Pages 8-9</p>	<p>“3.7a Criterion 1 to 4 relate to the guidance in RPG12 policy P1 which sets out location principles. UDP1 takes its definition of urban areas (see paragraph 3.86) from the one used in the adopted plan. Minimising the need for greenfield development and reusing suitable brownfield sites and buildings are also embodied in P1 and in PPG3. RPG and PPG13 also gives priority to locating development in locations accessible by a</p>	<p>“3.7a Criterion 1 to 4 relate to the guidance in RPG12 policy P1 which sets out location principles. UDP1 takes its definition of urban areas (see paragraph 3.86) from the one used in the adopted plan. Minimising the need for greenfield development and reusing suitable brownfield sites and buildings are also embodied in P1 and in PPG3. RPG and PPG13 also gives priority to locating development in locations accessible by a</p>	<p>Correct grammatical errors.</p>

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	<p>range of transport modes and in public transport corridors, this is reflected in criterion 3. Criterion 4 reflects one of the principles of sustainable development that of minimising the need to travel to access services and facilities. Sites have been carried forward from the adopted UDP, housing and employment sites which do not have an extant permission have been re examined through a sustainability appraisal. Where sites perfume particularly poorly in the sustainability appraisal they are not included as proposed development sites.”</p>	<p>range of transport modes and in public transport corridors, this is reflected in criterion 3. Criterion 4 reflects one of the principles of sustainable development that of minimising the need to travel to access services and facilities. Sites have been carried forward from the adopted UDP. The housing and employment sites which do did not have an extant permission were have been re examined through a sustainability appraisal. Where sites perfume performed particularly poorly in the sustainability appraisal they are were not included as proposed development sites.”</p>	
<p>Mod - Mod/PF/PP/3</p> <p>UDP – Policy UDP2 and Paragraphs 3.13 and 3.93 Restraining Development</p> <p>IR – Policy Framework, paragraphs 3.13-3.22, Pages 9-12</p>	<p>3.13 The Council received clear advice from the Inspector who considered the objections to the first UDP to review the Green Belt. He advised the Council to review the green belt with the aim of determining a long term boundary as part of the review of the UDP. At the time of preparing the review the then emerging new Regional Planning Guidance offered advice on circumstances where a local review may be necessary. The Council has conducted a review and considered whether exceptional circumstances exist which require changes to be made to the extent of the green belt. The Council is satisfied that there is not a general need to remove land from the green belt to meet the development needs of the District. There is in a limited number of circumstances need to revise the boundary where it is not clearly defined on the ground and where previous decisions taken in exceptional circumstances have made the green belt boundary obsolete. Details of individual changes and the reasons for them</p>	<p>3.13 The Council received clear advice from the Inspector who considered the objections to the first UDP to review the Green Belt. He advised the Council to review the green belt with the aim of determining a long term boundary as part of the review of the UDP. At the time of preparing the review the then emerging new Regional Planning Guidance offered advice on circumstances where a local review may be necessary. The Council has conducted a review and considered whether exceptional circumstances exist which require changes to be made to the extent of the green belt. The Council is satisfied that there is not a general need to remove land from the green belt to meet the development needs of the District within this Plan. There is in a limited number of circumstances need to revise the boundary where it is not clearly defined on the ground and where previous decisions taken in exceptional circumstances have made the green belt boundary obsolete. Details of individual changes and the reasons for</p>	<p>The Council is disappointed that the Inspector does not acknowledge in paragraph 3.13 that the Council conducted the review of the green belt sought by the Inspector who considered the first UDP. In that review the Council did not find exceptional circumstances to remove land from the green belt to meet longer term development needs. It is on this point of exceptional circumstances that the Inspector comes to a different conclusion to that of the Council when it formulated the deposit Plan</p> <p>In paragraph 3.19 the Inspector sets out the exceptional circumstances which necessitates a revision of the green belt boundary. These are the failure to make adequate provision for development needs beyond the Plan period and the inclusion of safeguarded land which may not accord with the Plan’s location strategy, RPG12 or the advice in PPG3.</p> <p>It appears that the both of these circumstances address the need to remove land from the green belt and designate it for housing or for safeguarded land.</p> <p>The Council accepts that addressing the need for land for development beyond the Plan period can be an exceptional circumstance which may necessitate a revision to the green belt</p>

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	<p>can be found in the Proposals Reports. Changes which are too small to be shown on the Proposals Map (under 0.4ha) are detailed in a separate report entitled District Wide Minor Green Belt Changes .</p>	<p>them can be found in the Proposals Reports. Changes which are too small to be shown on the Proposals Map (under 0.4ha) are detailed in a separate report entitled District Wide Minor Green Belt Changes.</p> <p>3.13aa However PPG2 states that when local planning authorities prepare new or revised plans, any proposals affecting Green Belts should be related to a timescale which is longer than that normally adopted for other aspects of the plan and that they should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. The PPG does not specify what this timescale should be. This replacement plan has a plan period running to 2014 and a Green Belt which will be robust until 2021 and probably beyond. However the Inspector who presided over the inquiry into objections to this replacement plan recommended that the Green Belt boundary established in this Plan should endure until 2026 and that a post inquiry green belt review should be undertaken to identify the deletions to the Green Belt necessary to achieve this. While rejecting this recommendation, the Council considers that its first Local Development Scheme should give a high priority to producing a Development Plan Document to address the extent of the Green Belt. The Scope and timing of this document will be considered in the Local Development Scheme. Its content will be informed by the emerging Regional Spatial Strategy and the Council's Urban Capacity Study.</p>	<p>boundary. Furthermore it accepts that once the decision has been made to remove a site from the green belt to meet development needs for housing the timing of the release of the site (i.e. its designation as a phase 2 housing site or as land safeguarded for longer term needs) should be determined on the basis of the sequence set out in RPG policy H2. Subject to any overriding consideration of the relative sustainability of different locations which may lead to a different conclusion.</p> <p>The Council does not accept that the rUDP should provide a green belt which endures to 2026 at this time. In an ideal world this is a laudable Planning objective. However, the circumstances of the completion and adoption of the rUDP are not ideal and are rather different to the circumstances when the Inspector considered this matter at the Inquiry. The significant changes in circumstances since the Inquiry concern firstly the timetable and progress on the Regional Spatial Strategy and secondly the fundamental review of the Development Plan system.</p> <p>At the time of the Inquiry there was not a timetable for the replacement of RPG12 with the new Regional Spatial Strategy. In fact at that stage the concept of the Regional Spatial Strategy (RSS) was being debated as part of the preparation for the 2004 Planning and Compulsory Purchase Act 2004. The Yorkshire & Humber Regional Assembly (The Regional Planning Body) has now published a programme for the RSS. This programme as set out in the Project Plan published in December 03 envisages a submission to the Secretary of State in December 04. This submission date is now delayed to March 05 to allow for proper consideration of the 'Northern Way' initiative. Even with this delayed submission date and allowing 18 months for the completion of the statutory process, RSS would be approved in Sept 06. The approved RSS will provide a clear strategic context for the further review of the Green Belt and would set out any strategic considerations which might form exceptional circumstances for taking land out of the green belt. This point is further reinforced in paragraph 4.44 of RPG12 which states that any localised review of the green belt should take account of the further work at the sub-regional level set out in paragraphs 4.40 and 4.41. As this 'further work' is now being progressed as part of the wider work on the RSS it is reasonable to await the outcome of that</p>

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	<p>3.13a The Governments policy as set out in Planning Policy Guidance Note 25 'Planning and Flood Risk' is to reduce as far as practical, the risk to people and the developed and natural environment from flooding. The guidance states that building in washlands should be wholly exceptional and limited to essential infrastructure. A risk based approach should be adopted when assessing proposals within or affecting flood risk areas, defined by the indicative flood plain maps produced by the Environment Agency. The proposals in the Plan have been developed in consultation with the Environment Agency and this included advice from the Agency on flood risk.</p> <p>Areas of Restraint</p> <p>93 Most of the Districts countryside is subject to restraint policy through green belt. The general extent of the green belt in the adopted plan was originally defined in the West Yorkshire Structure Plan as approved in 1980. Detailed boundaries were confirmed in the Wharfedale Green Belt Subject Local Plan adopted in 1988</p>	<p>3.13a The Governments policy as set out in Planning Policy Guidance Note 25 'Planning and Flood Risk' is to reduce as far as practical, the risk to people and the developed and natural environment from flooding. The guidance states that building in washlands functional floodplains should be wholly exceptional and limited to essential infrastructure. Washlands are principally areas of functional floodplain and provide a basis for the consideration of development proposals, subject to consultation with the Environment Agency. PPG25 indicates that where there are extensive areas of high-risk zones and sites in lower risk zones are not available, particular attention should be given to design and mitigation measures. A risk based approach should be adopted when assessing proposals within or affecting flood risk areas, defined by the indicative flood plain maps produced by the Environment Agency. The proposals in the Plan have been developed in consultation with the Environment Agency and this included advice from the Agency on flood risk</p> <p>Areas of Restraint</p> <p>93 Most of the Districts countryside is subject to restraint policy through green belt. The general extent of the green belt in the adopted plan was originally defined in the West Yorkshire Structure Plan as approved in 1980. Detailed boundaries were confirmed in the Wharfedale Green Belt Subject Local Plan adopted in 1988 and the UDP adopted in 1998. The Inspector</p>	<p>work before commencing any further review of the extent of the green belt in Bradford.</p> <p>The Inspector says in paragraph 3.14 that the green belt should endure for 20 years from the date of the Plan's adoption and from this concludes that the green belt should endure to 2026. Consequently the Inspector assumes that it will take a further two years (to 2006) to complete this Plan having allowed for the additional time it will take to conduct a further review of the Green belt and test this review through a Modifications inquiry. Given the coincidence in the timetable for completion of the RSS and the Inspector's timetable for the further review of the green belt the Council believes it is reasonable to await the strategic context for the review. This position is further reinforced through the issues raised in the reform of the Development Plan making system introduced in the Planning and Compensation Act 2004.</p> <p>The Government's reform of the Development Plan system fundamentally changes the way future Development Plans will be devised and implemented. Parts of the rUDP will be reviewed and rolled forward whilst other parts will be 'saved' through the transitional arrangements for a longer period of time. This creates more flexibility in how the Council decides to address particular topics through individual Development Plan Documents. The Council will set out its priorities for new Development Plan Documents in the Local Development Scheme. The scheme will give a high priority to addressing the extent of the green belt and in light of the Inspector's conclusions on exceptional circumstances a linked study of longer term provision for housing and the extent of the green belt is the likely way forward, within the strategic parameters being set by RSS.</p> <p>A further matter for consideration in assessing the implications of holding a further Inquiry and the consequent delay in the adoption of the Plan is the impact of the EU Directive on Strategic Environmental Assessment. The implementation of this directive includes an exemption from the provisions within it for any Plan currently underway which should be assessed provided it is completed before July 2006. Should the rUDP not be the completed and adopted by that date the provisions of the Directive would apply. Meeting these provision retrospectively is not a practical proposition for a complex</p>

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	<p>and the UDP adopted in 1998. The Inspector who considered objections to the UDP urged the Council to carry out a full scale review of the green belt, which has been done as part of the plan review. Further information can be found on the green belt review in the supporting text to principal policy UDP2.</p>	<p>who considered objections to the UDP urged the Council to carry out a full scale review of the green belt, which has been done as part of the plan review. Further information can be found on the green belt review in the supporting text to principal policy UDP2.</p>	<p>plan such as the rUDP. Therefore it is essential to complete the plan prior to this date. There is a significant risk that the Plan would not be complete by this date because of the scale of modification required to the Plan to address the green belt and the scale of likely challenge to the review of the green belt. Indeed the Inspector's own timetable for likely adoption demonstrates the potential of passing the critical date of July 2006.</p> <p>The Government stresses in PPG1 the importance to the Plan led system of having an up to date Development Plan. The courts support the Government on this point. In the case <i>Drexline Holdings v Cherwell District Council</i> ([1998] J.P.L. 361) one of five tests the courts applied to determining whether a modifications inquiry should be held is delay and the desirability of securing an up to date Development Plan. In the circumstances of the replacement UDP in Bradford the implications of delay could well be profound particularly when considering the introduction of the Strategic Environmental Assessment Directive as set out in the preceding paragraph</p> <p>In considering the implications of a delay in the review of the green belt the Council has had regard to the Inspector's concerns set out in paragraph 3.13. In particular that not reviewing the green belt prior to the adoption of the Plan could lead to development which is less sustainable than that which could be delivered through sites identified in the review of the green belt. The Council has set out in the statement of decision on the timescale of the plan that the strategic context for the green belt review will be clear later in 2006 and a Development Plan Document to address housing and green belt will quickly follow on. Consequently, the re-examination of the supply of housing sites and any more sustainable opportunities arising from urban capacity and the green belt review will be complete before the phase 2 Housing sites become available for development. In these circumstances it is very unlikely that developments in less sustainable locations, other than those which had an extant permission at the time of depositing the rUDP, will have been implemented.</p> <p>The inspector states at paragraph 3.14 that removing land from the green belt does not imply that it will be developed. The Council finds it difficult to reconcile this view with firstly the role of safeguarded</p>

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			<p>land as set out in PPG2 and the need to consider all non green belt options for development before making proposals to remove land from the green belt and secondly the Inspector's own calculations on the life of the green belt at paragraph 3.17 of his report which assumes all safeguarded land will be developed. Furthermore once the land has been removed from the green belt should a future decision maker wish to re-instate the green belt designation the tests set out by the Courts in the Copas case set out below would apply. The implication of this is that it is very unlikely that such a site could be re-instated as green belt.</p> <p>In paragraph 3.17 the inspector sets out how he has calculated the land requirements to secure a green belt which endures to 2026. The Council accepts his approach to the assumptions which underlie these calculations such as those relating to windfall and density. Applying these assumptions to the Councils proposed modifications to the plan leads to a green belt which will endure to 2021. The Council does not accept that the Plan windfall allowances should be the basis for calculating a longer term green belt. The Council's view is that a full urban capacity study should inform this calculation. This is contrary to the Inspectors advice in paragraph 6.61 of his report regarding the timing of urban capacity work as the Inspector suggests this work should follow on from the adoption of the Plan. The Inspector's approach does not provide evidence to show all other options have been exhausted and the removal of land from the green belt is the only option remaining.</p> <p>The Inspector makes a number of recommendations that result in adding land to the green belt on specific sites. Exceptional circumstances are required to add land to green belt and the Courts in a case Copas v The Royal Borough of Windsor and Maidenhead ([2001] J.P.L. 1169) has led to a very specific test to be applied when adding land the green belt. This test requires that 'some fundamental assumption which caused the land initially to be excluded from the Green Belt is there after clearly and permanently falsified by a later event'. In the Inspectors general consideration of the green belt (paragraphs 3.13 to 3.20 of the report) there is not any specific reference to adding land to the green belt and the 'Copas' case, despite him referring to the case in other parts of his report. Therefore the Council only course of action is to consider each site</p>

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			<p>specific case where the inspector is recommending adding land to the green belt on the merits of the inspectors analysis and reasons for that individual site.</p> <p>As a consequence of the foregoing analysis the Council does not accept the Inspectors recommendations on the extent of the green belt. However paragraph 3.13 will be amended to indicate that the extent of the green belt will be reconsidered in a Development Plan Document. The scope and timing of this document will be addressed in the Local Development Scheme.</p>
<p>Mod - Mod/PF/PP/4</p> <p>UDP – Paragraphs 3.23 to 3.36</p> <p>IR – Policy Framework paragraph 6.51 pages 55 to 66</p>	<p>3.23 The time period for proposals in the Plan is to 2014. The RPG12 target for the replacement Plan for the period 1998-2014 is 22240. This comprises 15290 for Phase 1, 2000-2009, and 6950 for Phase 2, 2009-2014. The strategy and protection of the green belt must look well beyond the end of the plan. Applying a further six years to the plan period provides this and takes consideration of the green belt to 2020. If the annual RPG12 requirement was to continue, a further 8340 homes could be required taking the requirement to 30580 additional homes. The supply of housing in the replacement Plan has been considered in this light.</p> <p>3.24 The most recent monitoring of land available for housing development at the base date of the Plan, 1st April 2000, identified the following (to the nearest 100 homes) on sites larger than 0.4 ha:</p> <p style="text-align: center;">New homes built since 1st April 1998 2200</p>	<p>3.23 The time period for proposals in the Plan is to 2014. The RPG12 target for the replacement Plan for the period 1998-2014 is 22240. This comprises 15290 for Phase 1, 2000-2009, and 6950 for Phase 2, 2009-2014. The strategy and protection of the green belt must look well beyond the end of the plan. Applying a further six years to the plan period provides this and takes consideration of the green belt to 2020. If the annual RPG12 requirement was to continue, a further 8340 homes could be required taking the requirement to 30580 additional homes. The supply of housing in the replacement Plan has been considered in this light.</p> <p>3.24 The most recent monitoring of land available for housing development at the base date of the Plan, 1st April 2000, identified the following (to the nearest 100 homes) on sites larger than 0.4 ha:</p> <p style="text-align: center;">New homes built since 1st April 1998</p>	<p>For the reasons set out in the Inspector's Report.</p>

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	<p>Sites under construction 1300</p> <p>Sites with permission, specific yield 600</p> <p>Land with planning permission (estimated homes) 1100</p> <p>Land allocated for housing but not committed (0.4ha) 11700</p> <p>Land with expired planning permission (0.4ha) 3400 3400</p> <p>3.25 Homes are provided also on sites smaller than 0.1ha known, for monitoring purposes, as 'infill' sites, by the conversion of non-residential buildings, increasing the number of units in residential buildings, and through the development of larger sites not identified in the current Adopted Plan known, for monitoring purposes, as 'windfall' sites. If the trend for each of these continued throughout the plan period, they would add the following additional supply:</p> <p style="margin-left: 40px;">Infill 2000 Conversions 2800 Windfall 2000</p>	<p>2200</p> <p>Sites under construction 1300</p> <p>Sites with permission, specific yield 600</p> <p>Land with planning permission (estimated homes) 1100</p> <p>Land allocated for housing but not committed (0.4ha) 11700</p> <p>Land with expired planning permission (0.4ha) 3400 3400</p> <p>3.25 Homes are provided also on sites smaller than 0.1ha known, for monitoring purposes, as 'infill' sites, by the conversion of non- residential buildings, increasing the number of units in residential buildings, and through the development of larger sites not identified in the current Adopted Plan known, for monitoring purposes, as 'windfall' sites. If the trend for each of these continued throughout the plan period, they would add the following additional supply:</p> <p>Infill 2000 Conversions 2800 Windfall 2000</p>	

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	<p>3.26 In the preparation of the replacement Plan sites under construction have been included in the Phase 1 supply, though they have not all been shown as allocated sites on the Proposals Maps, particularly those sites where the remaining area is <0.4ha. The remaining yield for all sites under construction have been included in the Phase 1 supply calculations.</p> <p>3.26a Sites with planning permission, with either a specific or estimated yield, that were not under construction at the base date, have been allocated as Phase 1 sites and included in the supply calculations, unless they form part of land that is subject to another designation in the replacement Plan, for example, UR7 Mixed Use areas. In mixed use areas the yield from these sites will contribute to the housing supply of the replacement Plan through windfall.</p> <p>3.26b Land allocated for housing in the current Adopted Plan, but not committed, and land with an expired planning permission for housing were tested for their suitability for re-inclusion in the replacement Plan as described in paragraph 3.7. Not all these sites were found to warrant inclusion in the replacement Plan.</p> <p>3.26c Some new sites have been identified from former school sites, vacant land and sites proposed to be reallocated in</p>	<p>3.26 In the preparation of the replacement Plan sites under construction have been included in the Phase 1 supply, though they have not all been shown as allocated sites on the Proposals Maps, particularly those sites where the remaining area is <0.4ha. The remaining yield for all sites under construction have been included in the Phase 1 supply calculations.</p> <p>3.26a Sites with planning permission, with either a specific or estimated yield, that were not under construction at the base date, have been allocated as Phase 1 sites and included in the supply calculations, unless they form part of land that is subject to another designation in the replacement Plan, for example, UR7 Mixed Use areas. In mixed use areas the yield from these sites will contribute to the housing supply of the replacement Plan through windfall.</p> <p>3.26b Land allocated for housing in the current Adopted Plan, but not committed, and land with an expired planning permission for housing were tested for their suitability for re-inclusion in the replacement Plan as described in paragraph 3.7. Not all these sites were found to warrant inclusion in the replacement Plan.</p> <p>3.26c Some new sites have been identified from former school sites, vacant land and sites proposed to be</p>	

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	<p>the replacement Plan. Other sites are no longer available for housing development, for example, a number of allotment belts have been withdrawn from prospective disposal for housing as allocated in the current Adopted Plan and commitments have been given to return or develop some sites for recreational use. All prospective new housing allocations were tested for their suitability for inclusion in the replacement Plan as described in paragraph 3.7.</p> <p>3.27 RPG12 assumes that all new housing land can be developed at an average density of 38 dwellings per hectare (dpha), which is much higher than the 25 dpha historical average achieved across the district.</p> <p>3.28 An appraisal has been carried out to check the estimate on the basis of alternative densities. At the extremes, an upper density of 60 dpha has been tested against sites that are located within city and town centres and good quality public transport corridors and a lower density of 30 dpha has been identified for sites in the less well located areas and settlements. In order to establish that higher densities are in reality achievable the results from monitoring of new density policies in the replacement Plan will be needed. It is assumed, for the supply calculations, that outside centres and</p>	<p>reallocated in the replacement Plan. Other sites are no longer available for housing development, for example, a number of allotment belts have been withdrawn from prospective disposal for housing as allocated in the current Adopted Plan and commitments have been given to return or develop some sites for recreational use. All prospective new housing allocations were tested for their suitability for inclusion in the replacement Plan as described in paragraph 3.7.</p> <p>3.27 RPG12 assumes that all new housing land can be developed at an average density of 38 dwellings per hectare (dpha), which is much higher than the 25 dpha historical average achieved across the district.</p> <p>3.28 An appraisal has been carried out to check the estimate on the basis of alternative densities. At the extremes, an upper density of 60 dpha has been tested against sites that are located within city and town centres and good quality public transport corridors and a lower density of 30 dpha has been identified for sites in the less well located areas and settlements. In order to establish that higher densities are in reality achievable the results from monitoring of new density policies in the replacement Plan will be needed. It is assumed,</p>	

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	<p>corridors only 50% of development will be at 38dpha, the remainder will be at 30 dpha. Within centres and corridors, 75% of development will be at 38 dpha, but 25% will be at a higher density of 50 dpha.</p> <p>3.29 The projection of the trend elements without any evaluation would be unjustified. Accordingly, the infill trend is considered to be too high as the potential supply of small sites (often large gardens) falls. This trend figure has been discounted to 75% giving 90 dwellings per year.</p> <p>3.30 The potential for conversions is underestimated if a stronger market can be created. A national study by specialist consultants has confirmed that this District has this potential as long as measures can be taken to support the development of stronger market demand. The replacement Plan, through policy H5, promotes the conversion of buildings to residential use where possible. Policy E5A, though, will not lead to the same number of agricultural buildings in rural areas being converted into dwellings as has been the case in previous years. Overall, the annual contribution of 175 has been increased to 200.</p> <p>3.31 The windfall trend to date</p>	<p>for the supply calculations, that outside centres and corridors only 50% of development will be at 38dpha, the remainder will be at 30 dpha. Within centres and corridors, 75% of development will be at 38 dpha, but 25% will be at a higher density of 50 dpha.</p> <p>3.29 The projection of the trend elements without any evaluation would be unjustified. Accordingly, the infill trend is considered to be too high as the potential supply of small sites (often large gardens) falls. This trend figure has been discounted to 75% giving 90 dwellings per year.</p> <p>3.30 The potential for conversions is underestimated if a stronger market can be created. A national study by specialist consultants has confirmed that this District has this potential as long as measures can be taken to support the development of stronger market demand. The replacement Plan, through policy H5, promotes the conversion of buildings to residential use where possible. Policy E5A, though, will not lead to the same number of agricultural buildings in rural areas being converted into dwellings as has been the case in previous years. Overall, the annual contribution of 175 has been increased to 200.</p> <p>3.31 The windfall trend to date</p>	

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	has contained an element of green field sites; these are unlikely to come forward in future owing to preference being given to the development of previously developed land through policy UR4. Alternatively, the promotion of mixed-use areas (Policy UR7) will support the trend figure at the higher level of 175 dwellings per year.	has contained an element of green field sites; these are unlikely to come forward in future owing to preference being given to the development of previously developed land through policy UR4. Alternatively, the promotion of mixed-use areas (Policy UR7) will support the trend figure at the higher level of 175 dwellings per year.	
	3.32	3.32	
	3.33	3.33	
	3.34	3.34	
	3.35 Paragraph 3.7 describes how housing allocations in the Plan have been identified as being either Phase 1, or Phase 2. The respective time periods being 2000-2009 and 2009-2014.	3.35 Paragraph 3.7 describes how housing allocations in the Plan have been identified as being either Phase 1, or Phase 2. The respective time periods being 2000-2009 and 2009-2014.	
	3.35a Phase 1 of the supply comprises; 2218 houses constructed between 1998-2000, derived from Building Control and National House Building Council returns for dwelling completions, 1262 houses from sites under construction, 515 houses from sites with permission (specific yield), 7440 houses from the density re-appraisal of sites with planning permission (estimated yield), allocated but not committed sites, and sites with	3.35a Phase 1 of the supply comprises; 2218 houses constructed between 1998-2000, derived from Building Control and National House Building Council returns for dwelling completions, 1262 houses from sites under construction, 515 houses from sites with permission (specific yield), 7440 houses from the density re-appraisal of sites with planning permission (estimated yield), allocated but not committed sites, and sites with an expired planning	

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	<p>an expired planning permission, together with appraised new sites, all using the density reappraisal figures in paragraph 3.28, 4185 houses from infill, conversions and windfall.</p> <p>3.35b The Phase 1 supply totals 15620 houses, sufficient to meet the requirement of 15290.</p> <p>3.35c Phase 2 of the supply comprises;</p> <p>5179 houses from the re-appraisal of allocated, but not committed sites, and sites with an expired planning permission, together with appraised new sites, using the density reappraisal figures in paragraph 3.28, 2325 houses from infill, conversions and windfall.</p> <p>3.35d The Phase 2 supply totals 7504 houses, sufficient to meet the requirement of 6950.</p> <p>3.35e Beyond the Plan Period, from 2014 to 2020, the housing land supply will comprise allocations from safeguarded land and the contributions from infill, conversions and windfall. If all safeguarded land were to be allocated for housing, using the density reappraisal figures in paragraph 3.28, this would yield some 4594 houses. Together with 2790 from the other sources, at this point in time, this is considered to be a sufficient basis</p>	<p>permission, together with appraised new sites, all using the density reappraisal figures in paragraph 3.28, 4185 houses from infill, conversions and windfall.</p> <p>3.35b The Phase 1 supply totals 15620 houses, sufficient to meet the requirement of 15290.</p> <p>3.35c Phase 2 of the supply comprises;</p> <p>5179 houses from the re-appraisal of allocated, but not committed sites, and sites with an expired planning permission, together with appraised new sites, using the density reappraisal figures in paragraph 3.28, 2325 houses from infill, conversions and windfall.</p> <p>3.35d The Phase 2 supply totals 7504 houses, sufficient to meet the requirement of 6950.</p> <p>3.35e Beyond the Plan Period, from 2014 to 2020, the housing land supply will comprise allocations from safeguarded land and the contributions from infill, conversions and windfall. If all safeguarded land were to be allocated for housing, using the density reappraisal figures in paragraph 3.28, this would yield some 4594 houses. Together with 2790 from the other sources, at this point in time, this is considered to</p>	

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	<p>towards meeting the requirement of 8340.</p> <p>3.35f Accordingly, the replacement Plan proposes that a sufficient supply exists to provide for all currently foreseeable housing requirements up to 2014.</p> <p>3.36 Policy H1a) of RPG12 also refers to aspirational development targets for previously developed land by strategic planning areas. Table H1 sets a figure of 57% for the Bradford District. Analysis of the wider housing supply from 1998 to 2014 suggests that if development takes place in accordance with the expectations of the plan, 50% will be on previously developed land.</p>	<p>be a sufficient basis towards meeting the requirement of 8340.</p> <p>3.35f Accordingly, the replacement Plan proposes that a sufficient supply exists to provide for all currently foreseeable housing requirements up to 2014.</p> <p>3.36 Policy H1a) of RPG12 also refers to aspirational development targets for previously developed land by strategic planning areas. Table H1 sets a figure of 57% for the Bradford District. Analysis of the wider housing supply from 1998 to 2014 suggests that if development takes place in accordance with the expectations of the plan, 50% will be on previously developed land.</p>	
<p>Mod - Mod/PF/PP/5</p> <p>UDP – Policy UDP5</p> <p>IR – Policy Framework pages 13 to 15 paragraph 3.35</p>	<p>UDP5</p> <p>PROVIDE FOR THE NEEDS OF THE COMMUNITIES IN APPROPRIATE LOCATIONS INCLUDING</p> <p>(1) MAKING PROVISION TO ENSURE 1390 HOMES PER YEAR</p> <p>(2) ENSURING THE WIDE RANGING HOUSING NEEDS OF THE COMMUNITY ARE MET</p> <p>(3) ENSURING OTHER SOCIAL</p>	<p>UDP5</p> <p>PROVIDE FOR THE NEEDS OF THE COMMUNITIES IN APPROPRIATE LOCATIONS INCLUDING</p> <p>(1) MAKING PROVISION TO ENSURE 1390 HOMES PER YEAR MAKING PROVISION TO ENSURE THE DEVELOPMENT OF AN AVERAGE OF 1390 HOMES PER YEAR OVER THE PLAN PERIOD</p> <p>(2) ENSURING THE WIDE RANGING HOUSING NEEDS OF THE COMMUNITY ARE MET</p> <p>(3) ENSURING OTHER SOCIAL</p>	<p>For the reasons set out in the Inspector’s Report.</p>

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	<p>PROVISION SUCH AS HEALTH AND EDUCATION IS MADE</p> <p>(4) MAKING PROVISION TO MEET THE DISTRICTS LEISURE AND RECREATION NEEDS INCLUDING PLAYING FIELDS AND CHILDREN'S PLAY</p>	<p>PROVISION SUCH AS HEALTH AND EDUCATION IS MADE</p> <p>(4) MAKING PROVISION TO MEET THE DISTRICTS LEISURE AND RECREATION NEEDS INCLUDING PLAYING FIELDS AND CHILDREN'S PLAY</p>	
<p>MOD - Mod/PF/PP/6</p> <p>UDP –Policy UDP6 Continuing Vitality of Centres,</p> <p>IR – Policy Framework, paragraphs 3.36-3.38, Pages 15-16</p>	<p>“Policy UDP6 TO SUSTAIN AND ENHANCE THE VIABILITY AND VITALITY OF THE CITY AND TOWN CENTRES, THROUGH PROMOTING THEIR ROLE AND RESTRICTING RETAIL LEISURE AND OFFICE DEVELOPMENTS OUTSIDE THE CENTRES”</p>	<p>“Policy UDP6 TO SUSTAIN AND ENHANCE THE VIABILITY AND VITALITY OF THE CITY AND TOWN CENTRES, THROUGH PROMOTING THEIR ROLE AND RESTRICTING RETAIL LEISURE AND OFFICE DEVELOPMENTS OUTSIDE THE CENTRES”</p> <p>“Policy UDP6 TO SUSTAIN AND ENHANCE THE VITALITY AND VIABILITY OF CENTRES, THROUGH PROMOTING THEIR ROLE AND GIVING SEQUENTIAL PREFERENCE TO MEETING RETAIL, LEISURE AND OFFICE DEVELOPMENT NEEDS WITHIN CENTRES”</p>	<p>For the reasons set out in the Inspector's Report</p>
<p>Mod - Mod/PF/PP/7</p> <p>UDP - Policy Framework, Paras 3.60 to 3.90 Location Strategy</p> <p>IR – Policy Framework,</p>	<p>3.78 The time scale of the location strategy accords with the overall time scale of the Plan as set out in the introduction to part one in paragraph 1.3. Therefore the Plan strategy in part 1 looks ahead beyond the end of the time period for RPG in 2016 and has proposals in Part 2 the policies and proposals which guide development extend for 10 years from the target adoption date of 2004. Furthermore to satisfactorily address the matter of areas of development restraint the Plan needs to broadly defined these in the location strategy</p>	<p>3.78 The time scale of the location strategy accords with the overall time scale of the Plan as set out in the introduction to part one in paragraph 1.3. Therefore the Plan strategy in part 1 looks ahead beyond the end of the time period for RPG in 2016 and has proposals in Part 2 the policies and proposals which guide development extend for 10 years from the target adoption date of 2004. Furthermore to satisfactorily address the matter of areas of development restraint the Plan needs to broadly defined these in the location strategy</p>	<p>The Inspector begins at paragraph 3.41 by pointing out the relationship between his recommendations on the Plan Strategy and his recommendations on both the timescale of the Plan and the life of the Green Belt. The Council has set out in its Statement of Decisions (ref SDxx) its reasons for not accepting either of these latter two recommendations. Consequently the Council does not accept the revisions the Inspector proposes to paragraph 3.78. However a minor change to paragraph 3.78 is required to reflect the Council's analysis in SDxx that the Plan provides a Green Belt which will endure until 2021.</p>

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<p>paragraphs 3.41-3.61, Pages 17-20</p>	<p>through the general extent of the green belt and in a manner which will ensure the green belt is robust until 2020 and probably beyond. This longer time period also accords with the time period of the 2020 Vision.</p> <p>The location of Development</p> <p>3.79 In order to give certainty the 1998 adopted UDP took as the start point for its location strategy the previous Structure and Local Plans. Similarly the start point for the replacement Plan is the current plan.</p> <p>3.80 Paragraph 2.29 of the previous plan summarises the location strategy of that Plan as follows.</p> <p>3.81 'This Plan will continue to provide for the selective expansion of Bradford and towns in the Aire and Wharfe Valley'.</p> <p>(i) Incorporates the development proposals of the Local Plans and adds to them in a way that: (a) capitalises on existing and future infrastructure (b) develops at a scale that ensures commensurate provision of community facilities</p> <p>(ii) Protects open space that has present or future importance to the community, in the inner city and other parts of the District</p> <p>(iii) Causes least disturbance to the green belt'</p>	<p>through the general extent of the green belt and in a manner which will ensure the green belt is robust until 2020 2021 and probably beyond. This longer time period also accords with the time period of the 2020 Vision.</p> <p>The location of Development</p> <p>3.79 In order to give certainty the 1998 adopted UDP took as the start point for its location strategy the previous Structure and Local Plans. Similarly the start point for the replacement Plan is the current plan.</p> <p>3.80 Paragraph 2.29 of the previous plan summarises the location strategy of that Plan as follows.</p> <p>3.81 'This Plan will continue to provide for the selective expansion of Bradford and towns in the Aire and Wharfe Valley'.</p> <p>(i) Incorporates the development proposals of the Local Plans and adds to them in a way that: (a) capitalises on existing and future infrastructure (b) develops at a scale that ensures commensurate provision of community facilities</p> <p>(ii) Protects open space that has present or future importance to the community, in the inner city and other parts of the District</p> <p>(iii) Causes least disturbance to the green belt'</p>	<p>The Council accepts the Inspector's view at paragraph 3.42 that the replacement plan replaces what exists rather than merely reviewing the current document. Except for matters relating to the adopted Plan green belt where exceptional circumstances need to be demonstrated before the new Plan can change the extent of the green belt. It follows from this that the Council accepts the need to delete paragraphs 3. 79 – 3.81</p> <p>The Council understands the Inspector's concern at paragraph 3.43 regarding the possibility of the 2020 Vision document pointing to different priorities for land allocation to those found in national policy. However it must be borne in mind that PPG12 at paragraph 3.3 states that a Planning Authority must have regard to national policies and goes on to say any departure from national policy must be supported with adequate reasons. In these circumstances the Council believes that provided it sets out adequate reasons it is not obliged to slavishly follow national policy.</p> <p>Having broadly accepted the Inspectors conclusions regarding the starting point of the Plan, it follows that the role of the main urban area as set out in 3.46 is also accepted. This will lead to a modification of the Council's own motion to recognise the role of the main urban area on the face of the Plan. The Council also accepts the tests to be applied when defining other urban areas set out in paragraph 3.47 of the Inspector's report which are drawn from paragraph 4.8 of RPG12 and the approach the Inspector takes in using comparative accessibility for the third test in paragraph 3.48 of his report</p> <p>Finally in considering the role of towns in the settlement hierarchy the Council agrees with the Inspector's view on the role of Queensbury and that Silsden should not be categorised as an urban area. However because of the status and function of Silsden it does not sit readily elsewhere in the hierarchy described in policy P1 of RPG12. The Council accepts the Inspector's conclusion that it does not score well in terms of current accessibility by public transport yet it has a good range of services (except for the absence of a secondary school) and has a much more substantial employment base than any other smaller settlement in the District. At present, until the RSS re-examines the role and function of settlements, Silsden should be</p>

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	<p>3.82 However the emphasis of the location strategy has changed because of a range of new factors including revisions to national advice and the review of Regional Planning Guidance which has developed a stronger regional spatial strategy and led to reductions in the overall need for land for housing. This change will place greater emphasis on accommodating development within the urban areas by encouraging the reuse of brownfield sites and the conversion of buildings whilst constraining the release of greenfield sites. These considerations are reflected in Principle Policies UDP1 and UDP2. To ensure these new considerations are applied in a consistent manner and other more local issues are fully considered the commitments in the adopted UDP have been re examined through a sustainability appraisal before being incorporated into the replacement Plan. Commitments which have, through the Sustainability Appraisal, been found to have significant negative aspects have not been incorporated in the Plan. An explanation of how the Sustainability Appraisal has been used to help develop the content of the Plan can be found in the Vision and objectives chapter.</p> <p>3.82a The principles of the location strategy have been applied to the development of policies and proposals. The following section examines in more detail the application of the principles in the context of RPG with respect to housing, the local economy, the role of centres and the identification of areas of restraint.</p>	<p>3.82 However The emphasis of the location strategy of the previous UDP has changed significantly because of a range of new factors including especially revisions to national policy advice and the review of Regional Planning Guidance which has developed a stronger regional spatial strategy and led to reductions in the overall need for land for housing. This change will place greater emphasis on accommodating development within the urban areas by encouraging the reuse of brownfield sites and the conversion of buildings whilst constraining the release of greenfield sites. These considerations are reflected in Principle Policies UDP1 and UDP2. To ensure these new considerations are applied in a consistent manner and other more local issues are fully considered the commitments in the adopted UDP have been re examined through a sustainability appraisal before being incorporated into the replacement Plan. Commitments which have, through the Sustainability Appraisal, been found to have significant negative aspects have not been incorporated in the Plan. An explanation of how the Sustainability Appraisal has been used to help develop the content of the Plan can be found in the Vision and objectives chapter.</p> <p>3.82a The principles of the location strategy have been applied to the development of policies and proposals. The following section examines in more detail the application of the principles in the context of RPG with respect to housing, the local economy, the role of centres and the identification of areas of restraint.</p>	<p>regarded as a less well located smaller settlement though when compared to the other settlements in this category it offers a much broader range of services and is better served by public transport.</p> <p>Turning now to the matter of urban extensions, the Council accepts the Inspector's analysis in paragraph 3.52 and his conclusion at 3.53 that the definition should be deleted from the Plan.</p> <p>The Inspector considers at paragraphs 3.54 and 3.55 the definition of the smaller settlements in good public transport corridors. He accepts that Steeton, Burley, Menston and Thornton all correspond to the RPG "nodes in good quality 'public transport corridors' radiating from within main urban areas". The Council agrees with him on this point and on his view at 3.56 that it is the settlement or node which matters to the location strategy, not the corridor itself.</p> <p>The Council accepts the need to redraft paragraphs 3.79-3.82a to explain how the location principles of policy P1 in RPG12 affect the Bradford District and to include a summary of the treatment of the location of housing provision to replace paragraphs 3.83-3.90.</p>

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	<p>Location of Housing Provision</p> <p>3.83 Guidance in PPG3 proposes in paragraph 30 a sequential approach to the search for locations for new provision which gives preference to brownfield sites. RPG develops this in a more region specific way in policy H2. This sequence is dealt with in the UDP through the location strategy articulated here, in the housing section, in the opening sections of each of the Proposals Reports which describe the role of the area and through the schedule of housing sites in the Proposals Reports.</p> <p>3.84 RPG in policy H2 sets out the sequencing of the search for housing sites. The sequence places location above brownfield/greenfield status in the priority for the release of sites. This is more logical in the context of wider sustainability considerations than simply giving greater priority to greenfield/brownfield status.</p> <p>3.85 The location strategy ensures the most sustainable locations are prioritised for accommodating housing provision. Therefore in the broad provision the following sequence is proposed</p> <p>3.86 The first location in the sequence is sites within the urban area and small rounding off sites. The urban areas defined as Bradford/Shipley/Baildon, the freestanding towns of Keighley, Ilkley, Bingley and the smaller towns of Silsden and Queensbury. (This definition is carried forward from the previous plan).</p>	<p>Location of Housing Provision</p> <p>3.83 Guidance in PPG3 proposes in paragraph 30 a sequential approach to the search for locations for new provision which gives preference to brownfield sites. RPG develops this in a more region specific way in policy H2. This sequence is dealt with in the UDP through the location strategy articulated here, in the housing section, in the opening sections of each of the Proposals Reports which describe the role of the area and through the schedule of housing sites in the Proposals Reports.</p> <p>3.84 RPG in policy H2 sets out the sequencing of the search for housing sites. The sequence places location above brownfield/greenfield status in the priority for the release of sites. This is more logical in the context of wider sustainability considerations than simply giving greater priority to greenfield/brownfield status.</p> <p>3.85 The location strategy ensures the most sustainable locations are prioritised for accommodating housing provision. Therefore in the broad provision the following sequence is proposed</p> <p>3.86 The first location in the sequence is sites within the urban area and small rounding off sites. The urban areas defined as Bradford/Shipley/Baildon, the freestanding towns of Keighley, Ilkley, Bingley and the smaller towns of Silsden and Queensbury. (This definition is carried forward from the previous plan).</p>	

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	<p>3.87 The second location is urban extensions these are defined as –</p> <p>On the edge with a minimum of 2 sides exposed to open view/countryside or topographical and other physical conditions which create such an exposed site.</p> <ul style="list-style-type: none"> • relatively significant to the settlement by size <p>3.88 The third location is smaller settlements in good public transport corridors as defined in paragraph 3.72 above for example Steeton, Burley and Menston.</p> <p>3.89 Outside the locations set out above small scale provision will be made to serve local needs and help ensure the continuation of local services in villages. At each stage of the sequence brownfields come first therefore urban greenfields come before urban extensions comprising previously developed land.</p> <p>3.90 A further consideration in the location of housing development is the findings of the examination of urban capacity (see supporting document No.3 Urban Capacity in the Bradford District). This indicates that there is considerable potential in the defined urban areas to accommodate housing through conversions and windfall sites. This potential has been considered in the decisions on the phasing of sites. However there is evidence of market constraints particularly on</p>	<p>3.87 The second location is urban extensions these are defined as –</p> <p>On the edge with a minimum of 2 sides exposed to open view/countryside or topographical and other physical conditions which create such an exposed site.</p> <ul style="list-style-type: none"> • relatively significant to the settlement by size <p>3.88 The third location is smaller settlements in good public transport corridors as defined in paragraph 3.72 above for example Steeton, Burley and Menston.</p> <p>3.89 Outside the locations set out above small scale provision will be made to serve local needs and help ensure the continuation of local services in villages. At each stage of the sequence brownfields come first therefore urban greenfields come before urban extensions comprising previously developed land.</p> <p>3.90 A further consideration in the location of housing development is the findings of the examination of urban capacity (see supporting document No.3 Urban Capacity in the Bradford District). This indicates that there is considerable potential in the defined urban areas to accommodate housing through conversions and windfall sites. This potential has been considered in the decisions on the phasing of sites. However there is evidence of market</p>	

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	<p>conversion provision which must temper the extent to which the urban areas will contribute in the early years of the Plan. But as there are significant extant permissions for sites on the edge of the urban areas there should not be any unreasonable constraint on the supply of housing sites.</p>	<p>constraints particularly on conversion provision which must temper the extent to which the urban areas will contribute in the early years of the Plan. But as there are significant extant permissions for sites on the edge of the urban areas there should not be any unreasonable constraint on the supply of housing sites.</p> <p>Settlement Hierarchy</p> <p><i>3.82b Policy P1 of RPG 12 sets out a series of locational principles to produce strategic patterns of development which will secure urban and rural renaissance, minimise the need to travel and minimise the development of Greenfield sites. It states that development plans should adopt a sequential approach to meeting development needs. This when combined with the Inspector’s recommendation to distinguish the Main Urban Area of Bradford as the first priority produces the following sequence;</i></p> <ul style="list-style-type: none"> <i>• First priority to locating development within the Main Urban Area of Bradford / Shipley / Baildon;</i> <i>• Second priority is to meet development needs through the reuse of suitable previously developed land and buildings within the urban areas of Keighley, Ilkley, Bingley and Queensbury;</i> <i>• Next is extensions to the above urban areas which provide integration of uses such as transport, housing and industry, starting with the Main Urban Area;</i> 	

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		<ul style="list-style-type: none"> • <i>Then locating development at Menston, Burley, Steeton and Thornton which are considered to be nodes in good quality public transport corridors (as defined earlier in this document at paragraph 3.72)</i> • <i>Finally development to meet local needs in the less well located smaller settlements which are predominantly in the rural parts of the District.</i> <p style="text-align: center;">Location of Housing Provision</p> <p><i>3.82c RPG policy H2 describes a sequential approach to identifying sites for housing within the broad parameters set out in policy P1. In the context of Bradford this sequence is set out in the table below :</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="text-align: center;">1</td> <td style="padding: 2px;"><i>Previously developed land and the conversion of buildings within the urban areas.</i></td> <td style="padding: 2px;"><i>Bradford / Shipley / Baildon, Keighley, Bingley, Ilkley, Queensbury.</i></td> </tr> <tr> <td style="text-align: center;">2</td> <td style="padding: 2px;"><i>Other infill (Greenfield) within the urban areas.</i></td> <td style="padding: 2px;"><i>Bradford / Shipley / Baildon, Keighley, Bingley, Ilkley, Queensbury.</i></td> </tr> <tr> <td style="text-align: center;">3</td> <td style="padding: 2px;"><i>Extensions to the main urban area on</i></td> <td style="padding: 2px;"><i>Bradford / Shipley /</i></td> </tr> </tbody> </table>	1	<i>Previously developed land and the conversion of buildings within the urban areas.</i>	<i>Bradford / Shipley / Baildon, Keighley, Bingley, Ilkley, Queensbury.</i>	2	<i>Other infill (Greenfield) within the urban areas.</i>	<i>Bradford / Shipley / Baildon, Keighley, Bingley, Ilkley, Queensbury.</i>	3	<i>Extensions to the main urban area on</i>	<i>Bradford / Shipley /</i>	
1	<i>Previously developed land and the conversion of buildings within the urban areas.</i>	<i>Bradford / Shipley / Baildon, Keighley, Bingley, Ilkley, Queensbury.</i>										
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			<i>previously developed land which is accessible or capable of being made accessible to services and jobs by good public transport.</i>	
		4	<i>Extension the main urban area on greenfield land which is accessible or capable of being made accessible to services and jobs by good public transport.</i>	
		5	<i>Extensions to the other urban areas on previously developed land which is accessible or capable of being made accessible to services and jobs by good public transport.</i>	
		6	<i>Extensions to the other urban areas on greenfield land which is accessible or capable of being made accessible to services and jobs by good public transport.</i>	
		7	<i>Development that supports the regional spatial strategy including around the nodes in good quality public transport corridors radiating from within the main urban areas.</i>	
		8	<i>Development in smaller settlements in the rural areas to meet local needs and/or</i>	

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		<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-right: 1px solid black; padding: 2px;"><i>support local services giving priority to previously developed land.</i></td> <td style="width: 50%; padding: 2px;"><i>Haworth, Oxenhope, Cottingley, Harden, Cullingworth, Wilsden, Denholme</i></td> </tr> </table>	<i>support local services giving priority to previously developed land.</i>	<i>Haworth, Oxenhope, Cottingley, Harden, Cullingworth, Wilsden, Denholme</i>	
<i>support local services giving priority to previously developed land.</i>	<i>Haworth, Oxenhope, Cottingley, Harden, Cullingworth, Wilsden, Denholme</i>				
<p>MOD - Mod/PF/PP/8</p> <p>UDP – Policy Framework, Paragraphs 3.100</p> <p>IR – Policy Framework, Paragraphs 3.64-3.73, Pages 21-23</p>	<p>“3.100 The replacement Plan includes performance indicators that monitor outcomes from all Principal Policies (new UDP1 to 9). This will be reported through regular (normally annual) monitoring of the replacement Plan and proposals to revise the policies and proposals in the Plan in the event of the Plan not delivering the strategy. This would be done through formal Alterations which can be made as and when needed. Some of the performance information is collected already and some new arrangements will need to be made; the remainder may be obtained from other agencies. Final Regional Planning Guidance (RPG) includes an extensive performance monitoring framework which is reported on annually and Strategic Planning Authorities such as Bradford Council will be contributing data to it. Where appropriate the indicators from RPG have been included in the Plan’s performance framework and data provided to the Regional Planning Body will also be used to measure the success of this Plan. The requirement to measure the success of the Plan will help to incorporate the replacement plan</p>	<p>“3.100 The replacement Plan includes performance indicators that monitor outcomes from all Principal Policies (new UDP1 to 9). This will be reported through regular (normally annual) monitoring of the replacement Plan and proposals to revise the policies and proposals in the Plan in the event of the Plan not delivering the strategy. This would be done through formal Alterations which can be made as and when needed. Some of the performance information is collected already and some new arrangements will need to be made; the remainder may be obtained from other agencies. <i>In particular it is important to ensure that a more comprehensive monitoring of trends in the economy and changes in patterns of employment is undertaken, to establish appropriate baseline data for the better monitoring of this aspect of the plan.</i> Final Regional Planning Guidance (RPG) includes an extensive performance monitoring framework which is reported on annually and Strategic Planning Authorities such as Bradford Council will be contributing data to it. Where appropriate the indicators from RPG</p>	<p>For the reasons set out in the Inspector’s Report</p>		

LIST OF MODIFICATIONS
UDP – Policy Framework Chapter 3 Principal Policies

Mod Ref UDP Ref Site Ref IR Page No.	Existing UDP Wording – 1st Deposit (June 2001) or Revised Deposit (July 2002) (<i>whichever is the latest approved by Council</i>)	Proposed Modification	Reason for Modification
	<p>within the Council's corporate objectives, community planning frameworks, other strategies and the Council's Best Value Performance Plan. At first deposit the Plan will not include specific targets for each indicator. Data is being collected to establish benchmarks for all indicators and targets will be included in the adopted Plan."</p> <p>Table of indicators, entry against policy UDP3:</p> <p>"3.3.1 % of Grade1 and 2* buildings at risk"</p> <p>Table of indicators, entry against policy UDP6:</p> <p>"6.1.1 New gross floorspace by location</p> <p>6.2.1 % of vacant shop units in city and town centers"</p>	<p>have been included in the Plan's performance framework and data provided to the Regional Planning Body will also be used to measure the success of this Plan. The requirement to measure the success of the Plan will help to incorporate the replacement plan within the Council's corporate objectives, community planning frameworks, other strategies and the Council's Best Value Performance Plan. At first deposit the Plan will not include specific targets for each indicator. Data is being collected to establish benchmarks for all indicators and targets will be included in the adopted Plan."</p> <p>Table of indicators entry against policy UDP3:</p> <p>"3.3.1 % of Grade1 and 2* buildings at risk"</p> <p>Table of indicators, entry against policy UDP6:</p> <p>"6.1.1 New gross floorspace by location</p> <p>6.2.1 % of vacant shop units in city and town centers</p> <p>6.2.2 diversity of uses and retailer representation</p> <p>6.2.3 changes in the quality of the environment"</p>	