

LIST OF MODIFICATIONS

UDP – Policy Framework, Chapter 6, Housing

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
Mod – MOD/PF/H/1 UDP – Paragraph 6.1	6.1 The context for the Housing chapter has been established in Part 1 of the Plan. The lower case text and policy of UDP5 sets the requirement and identifies the components of the housing land supply in the District.	6.1 The context for the Housing chapter has been established in Part 1 of the Plan. The lower case text and policy of UDP5 sets the housing requirement and identifies the components of the housing land supply in for the District. <i>The Housing chapter is primarily influenced by Government guidance on housing, contained in Planning Policy Guidance Note 3: Housing (PPG3) (2000) and by Regional Planning Guidance for Yorkshire and the Humber to 2016 (RPG12) (2001). This chapter applies the RPG12 housing requirement figure to the time periods of the Plan, documents the components of the housing supply, and, within the provisions of PPG3, deals with phasing of the housing land supply, monitoring, supply protection, density, affordable housing and the accommodation of gypsies and travelling showpeople.</i>	The Introduction of Housing Chapter needs amending as a consequence of other changes within the chapter to reflect the Inspector's Report.
Mod – MOD/PF/H/2 UDP – Paragraph 6.2	6.2 Decisions on phasing of sites take into account the location strategy and sustainability appraisal of sites. The lower case text to policy UDP1 explains how the allocated sites have been phased to ensure the more sustainable, well-located, sites are developed first.	6.2 Decisions on phasing of sites take into account the location strategy and sustainability appraisal of sites. The lower case text to policy UDP1 explains how the allocated sites have been phased to ensure the more sustainable, well-located, sites are developed first. <i>The Housing chapter also provides the policy framework to guide the determination of development proposals and planning applications for residential development. This chapter does not, however, include all policies relevant to residential development.</i>	The Introduction of Housing Chapter needs amending as a consequence of other changes within the chapter to reflect the Inspector's Report.

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		<i>Consideration should be given to other policies, for example, those found in the chapters on Design, Transport and Movement, Urban Renaissance, Community Facilities and Open Land in Settlements.</i>	
Mod – MOD/PF/H/3 UDP – Paragraph 6.3 IR – Policy Framework, pages 55 to 66 paragraph 6.51	6.3 The Housing chapter provides the mechanisms to ensure that the strategy in Part 1 of the Plan is delivered. It provides the policy framework to guide the determination of development proposals and planning applications for residential development. The Housing chapter, however, does not include all policies relevant to residential development. Policy UR1 requires development proposals to accord with the Plan considered as a whole, unless material considerations indicate otherwise. Consideration should be given to other policies, for example, those found in the chapters on Design, Transport and Movement, Urban Renaissance, Community Facilities and Open Land in Settlements.	6.3 The Housing chapter provides the mechanisms to ensure that the strategy in Part 1 of the Plan is delivered. It provides the policy framework to guide the determination of development proposals and planning applications for residential development. The Housing chapter, however, does not include all policies relevant to residential development. Policy UR1 requires development proposals to accord with the Plan considered as a whole, unless material considerations indicate otherwise. Consideration should be given to other policies, for example, those found in the chapters on Design, Transport and Movement, Urban Renaissance, Community Facilities and Open Land in Settlements. <i>The housing requirement for the Bradford District is set by RPG12, and, as noted in paragraph 3.22, the target is an annual average of 1390 additions to the housing stock over the period 1998 to 2016.</i>	The deleted text is as a consequence of other changes within the chapter to reflect the Inspector's Report. New text has been inserted for the reasons set out in the Inspector's Report.
Mod – MOD/PF/H/4 UDP – Paragraphs 3.19 to 3.39		6.3a <i>The time period for proposals in the Plan is to 2014, as noted in paragraph 3.7.</i>	The new text referring to the time period for proposals in the Plan is included for the reasons set out in the Inspector's Report. The Council has not accepted the Inspector's recommendation that the plan period be expressed as lasting until 2016 as noted in SD/PF/PP/6.

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IR – Policy Framework, pages 55 to 66 paragraph 6.51			
Mod – MOD/PF/H/5 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		6.3b <i>In setting the housing requirement, RPG12 has taken into account a regional target for a reduction in vacant dwellings. The Council is pursuing this target, as part of the Bradford Housing Partnership, through the Joint Housing Strategy and the Empty Homes Action Plan.</i>	For the reasons set out in the Inspector's Report.
Mod – MOD/PF/H/6 UDP – Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51	6.4 The Housing chapter is primarily influenced by new Government guidance on housing contained in PPG3. The chapter deals with phasing of the housing land supply, supply protection, density, affordable housing and the accommodation of gypsies and travelling showpeople.	The Housing Supply 6.4 The Housing chapter is primarily influenced by new Government guidance on housing contained in PPG3. The chapter deals with phasing of the housing land supply, supply protection, density, affordable housing and the accommodation of gypsies and travelling showpeople. At an early stage in the replacement Plan process, steps were taken to better establish how much additional development, particularly for housing, could be accommodated within the urban areas of the District. This is noted in paragraph 3.7 and documented in Background Document No. 3 Urban Capacity in the Bradford District.	The deleted text is as a consequence of other changes within the chapter to reflect the Inspector's Report. New text has been inserted for the reasons set out in the Inspector's Report.
Mod – MOD/PF/H/7 UDP - Paragraphs 3.19 to 3.39		6.4a <i>Decisions on the phasing of sites have been made using the location strategy of the Plan and the sustainability appraisal of sites, as noted in paragraph 3.7. The sequential approach to housing</i>	The location strategy and the sequential approach for housing allocations is explained in the Principal Policies chapter following SD/PF/PP/24. The Council consider that this is the most appropriate chapter to document this explanation, given that the location strategy applies to all development, not solely housing. The Housing chapter contains a reference to this documentation, but does not,

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IR – Policy Framework, pages 55 to 66 paragraph 6.51		<i>allocations, advocated by PPG3 and developed in a more region specific way in Policy H2 of RPG12, is dealt with in the Plan through the location strategy, as noted from paragraphs 3.82b and 3.82c. These paragraphs explain how the allocated sites have been phased to ensure the more sustainable, well-located, sites are developed first.</i>	unnecessarily, repeat the sequential approach.
Mod – MOD/PF/H/8 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		6.4b <i>Mixed use areas are described in the Urban Renaissance chapter, commencing at paragraph 4.35. These areas can contribute to the housing supply through specific contributions for some mixed use areas, and through the general assumptions that influence the conversions and windfall allowances.</i>	For the reasons set out in the Inspector's Report.
Mod – MOD/PF/H/9 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		6.4c <i>The housing supply of the Plan is documented in the following paragraphs, in terms of committed sites; the assumed contributions from sources of supply other than allocations, namely, infill sites, conversions, and windfall sites; and new housing allocations in the Plan. The housing supply is derived and calculated on a District wide basis.</i>	This paragraph needs introducing to the Housing Chapter as a consequence of other changes within the chapter to reflect the Inspector's Report.
Mod – MOD/PF/H/10 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		Commitments 6.4d <i>Monitoring of land available for housing development at the base date of the Plan, 1st April 2000, identified the following commitments:</i> <p style="text-align: right;">Number of</p>	For the reasons set out in the Inspector's Report. The level of commitments are noted, rounded to the nearest hundred, in paragraph 3.24 of the Revised Deposit Policy Framework and are used, un-rounded, in calculating the Phase 1 supply in paragraph 3.35a. The Inspectors has referred to the un-rounded figures in paragraph 6.9 of his report, and has used the un-rounded figures in Table 1 of his paragraph 6.42. The Council considers it more appropriate, and accurate, to continue to use un-rounded

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		<p><i>either a specific or estimated yield (number of dwellings), that were not under construction at the base date, are allocated as Phase 1 sites. Sites with permission for a specific yield have been included in the housing supply as a commitment. Where permission was not granted for a specific yield, the contribution for these Phase 1 allocations has been derived using the density appraisal noted in paragraph 6.4o.</i></p>	
<p>Mod – MOD/PF/H/11</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>Sources of Supply other than Allocations</p> <p>6.4h <i>Dwellings are also provided 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 Plan, known for monitoring purposes, as ‘windfall’ sites.</i></p> <p>6.4i <i>The contribution from infill development is assumed to be 40 dwellings per year, which reflects the declining trend from this source.</i></p> <p>6.4j <i>The annual contribution from conversions is assumed to be 200 dwellings per year. This reflects the national imperative to maximise the production of dwellings from recycling, and the potential for conversions that exists particularly in the City and town centres, mixed</i></p>	<p>The Council accepts the need to set out this contribution, but has chosen not solely to refer to ‘windfalls’. The Council prefers to consistently refer to ‘infill, conversions and windfalls’.</p>

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		<p><i>use areas and in redundant mills generally.</i></p> <p>6.4k <i>The contribution from windfall development is assumed to be 200 dwellings per year. This recognises the general policy concentration on urban development and the opportunities presented in mixed use areas.</i></p> <p>6.4l <i>The annual sum of these three assumptions is 440 dwellings.</i></p>	
<p>Mod – MOD/PFH/12</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>Allocations</p> <p>6.4m <i>All prospective new housing allocations were tested for their suitability for inclusion in the Plan through the sustainability appraisal, as described in paragraph 3.7.</i></p> <p>6.4n <i>RPG12 assumes that all new housing land can be developed at an average density of 38 dwellings per hectare (dph), which is much higher than the 25 dph historical average achieved across the District.</i></p> <p>6.4o <i>Following the policies in the Plan on density and land use efficiency, H7 and H8, it is assumed, solely for the supply calculations, that within City and town centres and good quality public transport corridors, 75% of development will be at 38 dph, but 25% will be at a higher density of 50 dph. Outside these centres and corridors the assumption is that only 50% of development will be at</i></p>	<p>These paragraphs needs introducing to the Housing Chapter as a consequence of other changes within the chapter to reflect the Inspector's Report.</p>

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		<p><i>38dph, the remainder will be at 30 dph.</i></p> <p>6.4p <i>These percentage densities have been applied to the total area of all allocations that were not subject to objections and consideration at the Public Inquiry.</i></p>	
<p>Mod – MOD/PF/H/13</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4q <i>For Phase 1 the total yield for unobjected allocations within centres and corridors is 3190 dwellings, and outside centres and corridors is 1043 dwellings. A discount of 400 units has been included to take account of greenfield sites where planning permission may expire without development taking place, and where planning permission may not be renewed.</i></p>	<p>For the reasons set out in the Inspector's Report.</p> <p>The total figure for the Phase 1 housing supply, and some of the constituent parts, in the table differ from those in the Inspectors Report, including the Addendum. This reflects the decisions the Council has made in applying the greenfield discount (Inspector's paragraph 6.22) to unobjected allocations outside centres and corridors.</p>
<p>Mod – MOD/PF/H/14</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4r <i>For Phase 2 the total yield for unobjected allocations within centres and corridors is 346 dwellings, and outside centres and corridors is 369 dwellings.</i></p>	<p>For the reasons set out in the Inspector's Report.</p>
<p>Mod – MOD/PF/H/15</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4s <i>For those allocations that were the subject of objections and consideration at the Public Inquiry, a more specific figure has been used in calculating the contribution to the housing supply.</i></p> <p>6.4t <i>If, since the base date of the plan, planning permission has been granted for housing on an objection allocation, the site specific yield of</i></p>	<p>These paragraphs need introducing to the Housing Chapter as a consequence of other changes within the chapter to reflect the Inspector's Report.</p>

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		<i>the permission has been used in assessing the contribution to the housing supply.</i>	
Mod – MOD/PF/H/16 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		6.4u <i>The total yield for such permissions for Phase 1 objected allocations is 1368 dwellings.</i>	For the reasons set out in the Inspector's Report. The total figure for the Phase 1 housing supply, and some of the constituent parts, in the table differ from those in the Inspectors Report, including the Addendum. This reflects the decisions the Council has made in accepting or rejecting the Inspector's recommendations on site specific cases.
Mod – MOD/PF/H/17 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		6.4v <i>The total yield for such permissions for Phase 2 objected allocations is 231 dwellings.</i>	For the reasons set out in the Inspector's Report.
Mod – MOD/PF/H/18 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		6.4w <i>For those objected allocations, where no subsequent planning permission had been granted at the time of the Public Inquiry, a site specific yield has been attributed to each, solely for the purposes of calculating the housing supply, based on evidence presented at the Inquiry.</i>	This paragraph needs introducing to the Housing Chapter as a consequence of other changes within the chapter to reflect the Inspector's Report.
Mod – MOD/PF/H/19 UDP - Paragraphs 3.19 to 3.39 IR – Policy Framework, pages 55 to 66 paragraph 6.51		6.4x <i>The total yield for these objected allocations is 2047 dwellings for Phase 1. This comprises 1341 dwellings on urban previously developed land and 706 dwellings on urban greenfield land.</i>	For the reasons set out in the Inspector's Report. The total figure for the Phase 1 housing supply, and some of the constituent parts, in the table differ from those in the Inspectors Report, including the Addendum. This reflects the decisions the Council has made in accepting or rejecting the Inspector's recommendations on site specific cases; by including the contribution from the objected site at Sykes Lane, Silsden, to the urban Greenfield total; and not accepting the greenfield status applied by

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<p>Mod – MOD/PF/H/20</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4y <i>The total yield for these objected allocations is 3750 dwellings for Phase 2. This comprises 588 on urban previously developed land; 1088 dwellings on urban greenfield land; 498 dwellings which are extensions to the main urban area; 857 dwellings which are extensions to other urban areas; 704 dwellings at nodes in good quality public transport corridors and 15 dwellings which are to meet local needs in rural areas.</i></p>	<p>the Inspector to a small number of sites.</p> <p>For the reasons set out in the Inspector’s Report.</p> <p>The total figure for the Phase 2 housing supply, and some of the constituent parts, in the table differ from those in the Inspectors Report, including the Addendum. This reflects the decisions the Council has made in accepting or rejecting the Inspector’s recommendations on site specific cases.</p>				
<p>Mod – MOD/PFH/21</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4z <i>The calculation of the housing supply, using the components documented in the preceding paragraphs, is shown for both phases of the Plan.</i></p>	<p>This paragraph needs introducing to the Housing Chapter as a consequence of other changes within the chapter to reflect the Inspector’s Report.</p>				
<p>Mod – MOD/PF/H/22</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4aa <i>The Phase 1 housing supply totals 15603 dwellings which meets the housing requirement of 15290 dwellings as shown in the following table:</i></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Phase 1 Housing Supply</th> <th style="text-align: center;">Number of dwellings</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><i>Phase 1 Housing Requirement 1998-2009</i></td> <td style="text-align: center;">15290</td> </tr> </tbody> </table>	Phase 1 Housing Supply	Number of dwellings	<i>Phase 1 Housing Requirement 1998-2009</i>	15290	<p>For the reasons set out in the Inspector’s Report.</p> <p>The total figure for the Phase 1 housing supply, and some of the constituent parts, in the table differ from those in the Inspectors Report, including the Addendum. This reflects the decisions the Council has made in accepting or rejecting the Inspector’s recommendations on site specific cases; in applying the greenfield discount (Inspector’s paragraph 6.22) to unobjected allocations outside centres and corridors; by including the contribution from the objected site at Sykes Lane, Silsden, to the urban Greenfield total; and not accepting the greenfield status applied by the Inspector to a small number of sites. The Council also considers it more appropriate, and accurate, to continue to use un-rounded figures for commitments in the calculation of the Phase 1 supply.</p>
Phase 1 Housing Supply	Number of dwellings						
<i>Phase 1 Housing Requirement 1998-2009</i>	15290						

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Mod – MOD/PF/H/23		6.4ab <i>The Phase 2 housing supply totals 6896 dwellings which meets the</i>	The new text referring to the Phase 2 housing supply is included for the reasons set out in the Inspector's Report.																

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<p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p><i>housing requirement of 6950 dwellings as shown in the following table:</i></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;"><i>Phase 2 Housing Supply</i></th> <th style="text-align: center;"><i>Number of dwellings</i></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><i>Phase 2 Housing Requirement 2009-2014</i></td> <td style="text-align: center;"><i>6950</i></td> </tr> <tr> <td style="text-align: center;"><i>Sources other than allocations (Infill, Conversions, Windfall.)</i></td> <td style="text-align: center;"><i>2200</i></td> </tr> <tr> <td style="text-align: center;"><i>Unobjected sites in centres/ corridors</i></td> <td style="text-align: center;"><i>346</i></td> </tr> <tr> <td style="text-align: center;"><i>Unobjected sites outside centres/ corridors</i></td> <td style="text-align: center;"><i>369</i></td> </tr> <tr> <td style="text-align: center;"><i>Objected sites granted permission since the base date</i></td> <td style="text-align: center;"><i>231</i></td> </tr> <tr> <td style="text-align: center;"><i>Objected sites which are urban previously developed land</i></td> <td style="text-align: center;"><i>588</i></td> </tr> <tr> <td style="text-align: center;"><i>Objected sites which are urban greenfield</i></td> <td style="text-align: center;"><i>1088</i></td> </tr> <tr> <td style="text-align: center;"><i>Objected sites which are extensions to main urban area</i></td> <td style="text-align: center;"><i>498</i></td> </tr> </tbody> </table>	<i>Phase 2 Housing Supply</i>	<i>Number of dwellings</i>	<i>Phase 2 Housing Requirement 2009-2014</i>	<i>6950</i>	<i>Sources other than allocations (Infill, Conversions, Windfall.)</i>	<i>2200</i>	<i>Unobjected sites in centres/ corridors</i>	<i>346</i>	<i>Unobjected sites outside centres/ corridors</i>	<i>369</i>	<i>Objected sites granted permission since the base date</i>	<i>231</i>	<i>Objected sites which are urban previously developed land</i>	<i>588</i>	<i>Objected sites which are urban greenfield</i>	<i>1088</i>	<i>Objected sites which are extensions to main urban area</i>	<i>498</i>	<p>The total figure for the Phase 2 housing supply, and some of the constituent parts, in the table differ from those in the Inspectors Report, including the Addendum. This reflects the decisions the Council has made in accepting or rejecting the Inspector's recommendations on site specific cases.</p> <p>The Council has not accepted the Inspector's recommendation that the plan period be expressed as lasting until 2016 as noted in SD/PF/PP/6.</p>
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<i>Objected sites to meet local needs in rural areas</i>	15										
<i>Total Phase 2 Housing Supply</i>	6896										
<p>Mod – MOD/PF/H/24</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4ac <i>Appendix F contains a matrix of housing sites in Phase 1 of the Plan. Appendix G contains a matrix of housing sites in Phase 2 of the Plan. Both appendices show the status of sites in relation to the sequential approach of the Plan, including whether or not the land is previously developed.</i></p>	<p>For the reasons set out in the Inspector's Report.</p> <p>The Council has not included all sites in one appendix. To avoid producing one, un-necessarily long list of sites in both phases, and to aid clarity of presentation, the Council has included two appendices, Appendix F for Phase 1 sites and Appendix G for Phase 2 sites.</p> <p>The Proposals Reports of the Revised Deposit Plan refer, in some instances, to sites that are a 'combination' of both previously developed land and greenfield land, where the constituent proportions are approximately equal. Because the Inspector has not categorised sites as combination sites, but merely as either previously developed or Greenfield, the Council thinks it best to use only those two categorisations. Therefore, for the purposes of these Appendices, these combination sites have been included as either previously developed land, or greenfield, on the basis of the largest constituent part.</p>								
Mod – MOD/PF/H/25		<i>Previously Developed Land</i>	<p>The new text referring to the proportion of the housing supply which is on previously developed land is included for the reasons set out in</p>								

LIST OF MODIFICATIONS
UDP – Policy Framework, Chapter 6, Housing

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>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4ad <i>Policy H1a) of RPG12 also refers to aspirational development targets for the proportion of housing development taking place on previously developed land. Table H1, of RPG12, 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, 57% will be on previously developed land.</i></p>	<p>the Inspector's Report.</p> <p>The Council has not accepted the Inspector's recommendation that the plan period be expressed as lasting until 2016 as noted in SD/PF/PP/6.</p>
<p>Mod – MOD/PF/H/26</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4ae <i>In Phase 1, if development takes place in accordance with the expectations of the plan, 64% will be on previously developed land.</i></p>	<p>For the reasons set out in the Inspector's Report.</p>
<p>Mod – MOD/PF/H/27</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55 to 66 paragraph 6.51</p>		<p>6.4af <i>In Phase 2, if development takes place in accordance with the expectations of the plan, 41% will be on previously developed land.</i></p>	<p>For the reasons set out in the Inspector's Report.</p>
<p>Mod – MOD/PF/H/28</p> <p>UDP - Paragraphs 3.19 to 3.39</p> <p>IR – Policy Framework, pages 55</p>		<p style="text-align: center;">Safeguarded Land</p> <p>6.4ag <i>The amount of safeguarded land in the Plan is 187.49 ha. If all this safeguarded land were to be allocated for housing, using the density reappraisal figures in paragraph 6.4o, and the annual rate of contributions from sources other</i></p>	<p>The new text referring to the amount of safeguarded land, and how long it might last, is included for the reasons set out in the Inspector's Report.</p> <p>The Council has not accepted the Inspector's recommendation that the plan period be expressed as lasting until 2016 as noted in SD/PF/PP/6.</p> <p>The Council's decision on the length of time the green belt should</p>

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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
to 66 paragraph 6.51		<i>than allocations remained at 440 dwellings, from paragraph 6.4I, this would meet the current RPG12 housing requirement for 7 years, from 2014.</i>	endure is noted in SD/PF/PP/4.
<p>Mod – MOD/PF/H/29</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73</p>	<p>Phasing the Housing Land Supply</p> <p>6.5 Paragraph 3.7, in the lower case text to policy UDP1, explains how sites have been placed in phases. Both Phase 1 and Phase 2 housing sites are listed in the Proposals Reports.</p> <p>6.6 Local authorities should include policies for the release of sites for residential development to “manage the release of sites over the plan period” and “control the pattern and speed of urban growth” (PPG3, paragraph 33). The aim of this is to “give priority to re-using previously-developed land within urban areas”, “create more sustainable patterns of development” and deliver part of the Government’s objectives and expectations of local planning authorities, as set out in paragraph 2 of PPG3.</p> <p>6.7 To meet the requirements of PPG3 the Plan needs to ensure that Phase 1 sites are developed before those in Phase 2. Therefore:</p>	<p>Phasing the Housing Land Supply</p> <p>6.5 Paragraph 3.7, in the lower case text to policy UDP1, explains how sites have been placed in phases. Both Phase 1 and Phase 2 housing sites are listed in Appendix F and Appendix G, respectively, and in the Proposals Reports.</p> <p>6.6 Local authorities should include policies in their Plan for the release of sites for residential development to “manage the release of sites over the plan period” and “control the pattern and speed of urban growth” (PPG3, paragraph 33). The aim of this is to “give priority to re-using previously-developed land within urban areas”, “create more sustainable patterns of development” and deliver part of the Government’s objectives and expectations of local planning authorities, as set out in paragraph 2 of PPG3. Consideration of planning applications through the development control process will have regard to the purposes of phasing in this chapter and in Policy UDP1.</p> <p>6.7 The Council is committed to meeting the requirements of PPG3, the Plan needs to ensureing that Phase 1 sites are developed before those in Phase 2, and reflecting the</p>	<p>These paragraphs of the Housing Chapter need amending as a consequence of other changes within the chapter to reflect the Inspector’s Report.</p>

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UDP – Policy Framework, Chapter 6, Housing

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>Policy H1</p> <p>PROPOSALS FOR RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS A PHASE 1 HOUSING SITE WILL BE PERMITTED, SUBJECT TO OTHER HOUSING POLICIES AND OTHER RELEVANT POLICIES ELSEWHERE IN THE PLAN.</p>	<p><i>approach to phasing advice contained in the DTLR Good Practice Guidance, “Planning to Deliver – The Managed Release of Housing Sites: Towards Better Practice”.</i> Therefore:</p> <p>Policy H1</p> <p>PROPOSALS FOR RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS A PHASE 1 HOUSING SITE WILL BE PERMITTED, SUBJECT TO OTHER HOUSING POLICIES AND OTHER RELEVANT POLICIES ELSEWHERE IN THE PLAN.</p>	
<p>Mod – MOD/PF/H/30</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73</p>	<p>Policy H2</p> <p>PROPOSALS FOR RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS A PHASE 2 HOUSING SITE WILL BE PERMITTED DURING PHASE 2 OF THE PLAN PROVIDED PHASE 1 SITES ARE BEING, OR HAVE BEEN, DEVELOPED IN ACCORDANCE WITH THE EXPECTATIONS OF THE PLAN, SUBJECT TO OTHER HOUSING POLICIES AND OTHER RELEVANT POLICIES ELSEWHERE IN THE PLAN.</p>	<p>Policy H2</p> <p>PROPOSALS FOR RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS A PHASE 2 HOUSING SITE WILL BE PERMITTED DURING PHASE 2 OF THE PLAN PROVIDED PHASE 1 SITES ARE BEING, OR HAVE BEEN, DEVELOPED IN ACCORDANCE WITH THE EXPECTATIONS OF THE PLAN, SUBJECT TO OTHER HOUSING POLICIES AND OTHER RELEVANT POLICIES ELSEWHERE IN THE PLAN. PROPOSALS FOR RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAP AS A PHASE 2 HOUSING SITE WILL NOT BE PERMITTED UNTIL THE TOTAL OF DWELLINGS COMPLETED OR COMMENCED DURING PHASE 1 IS</p>	<p>The Council accepts the need to delete the current phase 2 housing policy and replace it with the one recommended by the Inspector. However, the Council has not accepted the Inspector’s recommendation to number the new phase 2 housing policy as H3, keeping it as H2 instead. If the phase 2 housing policy became the new H3 then all the Phase 2 housing sites, currently referenced H2, would have to be re-referenced. Part of the new Phase 2 site references would be the notation ‘H3’, as the originating policy covering Phase 2 housing sites. This would confuse users of the plan into thinking that H3 sites were Phase 3 sites and that there were no Phase 2 sites. This is of particular importance as there were objectors to the plan who were seeking a third phase of the plan, with its own allocation of housing sites.</p> <p>In addition, the Council considers it preferable to document the phasing policies before the monitoring policy, which elaborates on some of the provisions of the Phase 2 Housing policy.</p> <p>Existing Policy H3 is renumbered accordingly.</p> <p>The Council accepts the need to include sub-paragraph (1) to the policy, but has chosen not solely to refer to ‘windfalls’. Following</p>

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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>90% OF THE CUMULATIVE PHASE 1 DWELLING REQUIREMENT. THE EARLY RELEASE OF PHASE 2 SITES WILL BE CONSIDERED IN THE FOLLOWING CIRCUMSTANCES:</p> <p>(1) ALLOCATED PHASE 1 SITES, AND INFILL CONVERSIONS AND WINDFALLS TOGETHER, PROVIDE CONSISTENTLY AND SIGNIFICANTLY FEWER DWELLINGS THAN CALLED FOR BY THE HOUSING REQUIREMENT, OR WOULD FAIL TO PRODUCE A 5 YEAR SUPPLY OF DWELLINGS. THIS COULD LEAD TO THE RELEASE OF INDIVIDUAL SITES OR GROUPS OF SITES, OR PHASE 2 AS A WHOLE COULD BE BROUGHT FORWARD.</p> <p>(2) WHERE A SITE COULD MAKE A SUBSTANTIAL CONTRIBUTION TO MEETING A LOCAL NEED FOR AFFORDABLE HOUSING IN CIRCUMSTANCES WHERE THERE IS A DEMONSTRABLE LACK OF AFFORDABLE HOUSING.</p> <p>(3) WHERE A SITE REQUIRES AN UNUSUALLY LONG LEAD TIME FOR INVESTMENT.</p> <p>POSTPONEMENT OF THE RELEASE OF PHASE 2 AS A</p>	<p>from the description of all sources of supply other than allocations, in new paragraph 6.4h of the Policy Framework, the Council prefers to consistently refer to 'infill, conversions and windfalls'.</p> <p>The Council accepts the Inspector's recommendation that Supplementary Planning Guidance (SPG) could provide the mechanism for the release of phase 2 housing sites. This would allow the Council to react positively and quickly to events not sufficiently fundamental to warrant an alteration or replacement to this UDP.</p> <p>However, the Council must have regard to the Planning and Compulsory Purchase Act 2004 (The Act), which commenced on 28th September 2004. The Act and accompanying Regulations (Town and Country Planning (Local Development) (England) Regulations 2004), now require Council's to produce Local Development Frameworks (LDF), rather than Unitary Development Plans. Revisions to the phasing of sites would have to follow the new system and also have regard to Planning Policy Statement 12 Local Development Frameworks (PPS12). If the Council considers it necessary to alter the phasing of sites, this will be carried out by the promotion of a Local Development Document as part of an LDF, rather than replacing, altering, or producing SPG to this UDP.</p>

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		<p><i>WHOLE WILL BE CONSIDERED IF THE ANNUAL CONTRIBUTION OF DWELLINGS FROM PHASE 1 SOURCES IS SIGNIFICANTLY GREATER THAN THE REQUIREMENT.</i></p> <p><i>WHERE THE COUNCIL CONSIDERS IT DESIRABLE TO RE-ASSIGN SITES BETWEEN PHASES OR TO CHANGE THE TIMING OF THE RELEASE OF PHASE 2, THIS WILL NORMALLY BE DONE BY PROMOTING A LOCAL DEVELOPMENT DOCUMENT AS PART OF THE LOCAL DEVELOPMENT FRAMEWORK.</i></p>	
<p>Mod – MOD/PFH/31</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73</p>	<p>6.8 The approach to phasing reflects the advice contained in the DTLR Good Practice Guidance, “Planning to Deliver – The Managed Release of Housing Sites: Towards Better Practice” (July 2001). Consideration of planning applications through the development control process will have regard to the purposes of phasing in this chapter and in Policy UDP1.</p>	<p>6.8 The approach to phasing reflects the advice contained in the DTLR Good Practice Guidance, “Planning to Deliver – The Managed Release of Housing Sites: Towards Better Practice” (July 2001). Consideration of planning applications through the development control process will have regard to the purposes of phasing in this chapter and in Policy UDP1. The housing supply of the Plan has been derived to meet the housing requirement set by RPG12, in accordance with the ‘Plan, Monitor, Manage’ approach advocated in PPG3.</p>	<p>This paragraph of the Housing Chapter needs amending as a consequence of other changes within the chapter to reflect the Inspector’s Report.</p>
<p>Mod – MOD/PF/H/32</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p>		<p>6.8a <i>Monitoring the sources of the supply will identify whether the requirement is being met, the cumulative total of housing completions, and the remaining supply in the Plan. It may also</i></p>	<p>The Council accepts the need to delete the current lower case text, paragraphs 6.8-6.11, and to replace them with new reasoned justification as recommended by the Inspector.</p> <p>The Council’s decision not to accept the Inspector’s recommendation on the number of the new phase 2 housing policy is justified at</p>

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<p>IR – Policy Framework, Pages 67 to 73 paragraph 6.78 [d]</p>		<p><i>indicate changed circumstances that could constitute other material circumstances sufficient to justify granting planning permission for individual planning applications, within the context documented in paragraphs 4.2 to 4.7 of the Urban Renaissance chapter. Monitoring could also point to the need for a reconsideration of the phasing of sites, particularly those in Phase 2.</i></p>	<p>SD/PF/H/7.</p>
<p>Mod – MOD/PF/H/33</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73</p>		<p>6.8b <i>It is not possible to predict all the potential outcomes of monitoring the components of supply, nor is it practical to cater for these eventualities and subsequent actions in a policy. However, if the housing requirement is not being met, the two principal situations that can be foreseen are that the housing completions are consistently and significantly below the requirement, or, that completions are significantly greater than the requirement. Both these are recognised in Policy H2, together with the actions the Council will consider in relation to the Phase 2 allocations in the Plan.</i></p>	<p>This paragraph needs introducing to the Housing Chapter as a consequence of other changes within the chapter to reflect the Inspector's Report.</p>
<p>Mod – MOD/PF/H/34</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73 Paragraph 6.78 [d]</p>	<p>6.9 The time periods for phases 1 and 2 have been set in the lower case text to policy UDP1, paragraph 3.7. Phase 1 lasts until 31/3/09 and phase 2 is from 1/4/09 to 31/3/14.</p>	<p>6.9 The time periods for phases 1 and 2 have been set in the lower case text to policy UDP1, paragraph 3.7. Phase 1 lasts until 31/3/09 and phase 2 is from 1/4/09 to 31/3/14. <i>In the event of a slower than expected flow of completions during Phase 1 of the Plan, the Council, working with the development industry, will seek to overcome any constraints affecting allocated sites and the</i></p>	<p>The Council accepts this recommendation with the exception of the numbering of the policy. The Council's decision not to accept the Inspector's recommendation on the number of the new phase 2 housing policy is justified at SD/PF/H/7.</p> <p>The Council accepts the need to include lower case text relating to sub-paragraph (1) to the policy, but has chosen not solely to refer to 'windfalls'. Following from the description of all sources of supply other than allocations, in new paragraph 6.4h of the Policy Framework, the Council prefers to consistently refer to 'infill, conversions and windfalls'.</p>

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		<p><i>development of potential infill conversions and windfalls. If this effort fails, and completions remain consistently and significantly below the housing requirement, the Council would consider re-assigning some part of the Phase 2 supply to Phase 1. Any sites chosen would be the most sustainable sites in phase 2 which could be developed early.</i></p>	
<p>Mod – MOD/PF/H/35</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73</p>		<p>6.9a <i>If completions from Phase 1 sources of housing supply are considerably greater than the requirement, the Phase 2 supply may not be required as soon as envisaged in the Plan, and the Council would consider the postponement of the release of Phase 2 as a whole. It is important, for reasons of sustainability, that Phase 1 sites are developed first, and that Phase 2 sites are not released prematurely.</i></p>	<p>This paragraph needs introducing to the Housing Chapter as a consequence of other changes within the chapter to reflect the Inspector's Report.</p>
<p>Mod – MOD/PF/H/36</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73 paragraph 6.78 [d]</p>		<p>6.9b <i>The Good Practice Guidance, "Planning to Deliver", notes the possibility of a demonstrable lack of affordable housing to meet local needs leading to the early grant of planning permission for sites which could meet such a need. This possibility is allowed for in the second exception to Policy H2. However, in considering any site under this exception, the Council will weigh the contribution towards meeting demonstrable unmet local needs for affordable housing against the harm, which the</i></p>	<p>The Council accepts this recommendation with the exception of the numbering of the policy. The Council's decision not to accept the Inspector's recommendation on the number of the new phase 2 housing policy is justified at SD/PF/H/7.</p>

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		<i>development of any particular site might cause, to sustainability objectives. The aim is not to allow the development of less sustainable sites, which are not in accordance with the location strategy/settlement hierarchy, or the phasing policy, or both, just because they could contribute affordable housing.</i>	
<p>Mod – MOD/PF/H/37</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73 paragraph 6.78 [d]</p>		<p>6.9c <i>There may be a very few major sites, in the Phase 2 housing supply, that will need site specific arrangements so that allowance can be made for unusually long lead times and complexities such as infrastructure provision. This possibility is allowed for in third exception to Policy H2. In these instances the Council could consider granting planning permission for development before the generality of phase 2 sites are released. In so doing, the Council would have to be satisfied that any planning conditions and obligations imposed would be sufficient to prevent the unsustainably premature completion of dwellings.</i></p>	<p>The Council accepts this recommendation with the exception of the numbering of the policy. The Council's decision not to accept the Inspector's recommendation on the number of the new phase 2 housing policy is justified at SD/PF/H/7.</p>
<p>Mod – MOD/PF/H/38</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing.</p> <p>IR – Policy Framework, Pages 67 to 73 paragraph 6.78 [d]</p>	<p>6.10 Phase 2 Housing sites will only be considered for early release for residential development if there has been a material change in circumstances, that outweighs the factors in the location strategy and sustainability appraisal that determined the allocation of the site as Phase 2, and would lead to a major development, or development providing significant benefits to the community. Such a development</p>	<p>6.10 Phase 2 Housing sites will only be considered for early release for residential development if there has been a material change in circumstances, that outweighs the factors in the location strategy and sustainability appraisal that determined the allocation of the site as Phase 2, and would lead to a major development, or development providing significant benefits to the community. Such a development</p>	<p>The Council accepts the Inspector's recommendation that Supplementary Planning Guidance (SPG) could provide the mechanism for the release of phase 2 housing sites. This would allow the Council to react positively and quickly to events not sufficiently fundamental to warrant an alteration or replacement to this UDP.</p> <p>However, the Council must have regard to the Planning and Compulsory Purchase Act 2004 (The Act), which commenced on 28th September 2004. The Act and accompanying Regulations (Town and Country Planning (Local Development) (England) Regulations 2004), now require Council's to produce Local Development</p>

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	would also have to meet the aim and objectives set out in Part 1 of the Plan, or meet a need that has not otherwise been identified.	would also have to meet the aim and objectives set out in Part 1 of the Plan, or meet a need that has not otherwise been identified. If the Council sought to amend the phasing provisions of the Plan, necessitated by Phase 1 completions being consistently and significantly below the requirement or being significantly greater than the requirement, or, where fundamentally changed circumstances affect the strategy of the Plan, it would normally seek to do so by promoting a Local Development Document, as part of the new Local Development Framework. This course of action would be subject to the prescribed public consultation.	Frameworks (LDF), rather than Unitary Development Plans. Revisions to the phasing of sites would have to follow the new system and also have regard to Planning Policy Statement 12 Local Development Frameworks (PPS12). If the Council considers it necessary to alter the phasing of sites, this will be carried out by the promotion of a Local Development Document as part of an LDF, rather than replacing, altering, or producing SPG to this UDP.
Mod – MOD/PF/H/39 UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Phasing. IR – Policy Framework, Pages 67 to 73	6.11 The expectations of the Plan are that the House Building Industry will deliver the housing development at the rate necessary to meet the housing requirement set in RPG 12, policy H1a) and in policy UDP5. The Performance Framework, in Part 1 of the Plan, requires regular monitoring of housing development. If, through the process of plan, monitor and manage, substantial differences are shown in the actual take up of land, compared with that currently being achieved and that anticipated by the Plan, then the Council will consider bringing forward an alteration to the Plan. If the take up of land is faster than anticipated, an alteration to the Plan would look to bring forward phase 2 sites for earlier development. If the take up of land is	6.11 The expectations of the Plan are that the House Building Industry will deliver the housing development at the rate necessary to meet the housing requirement set in RPG 12, policy H1a) and in policy UDP5. The Performance Framework, in Part 1 of the Plan, requires regular monitoring of housing development. If, through the process of plan, monitor and manage, substantial differences are shown in the actual take up of land, compared with that currently being achieved and that anticipated by the Plan, then the Council will consider bringing forward an alteration to the Plan. If the take up of land is faster than anticipated, an alteration to the Plan would look to bring forward phase 2	This paragraph of the Housing Chapter needs amending as a consequence of other changes within the chapter to reflect the Inspector's Report.

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	<p>slower than anticipated, an alteration to the Plan would look to consider phase 2 sites for later development than that envisaged by the Plan.</p>	<p>sites for earlier development. If the take up of land is slower than anticipated, an alteration to the Plan would look to consider phase 2 sites for later development than that envisaged by the Plan. Residential development is meant in its widest sense, including housing constructed by the market and Registered Social Landlords (RSLs), but also includes institutions, e.g. rest homes, nursing homes and care homes, as well as sheltered housing and student accommodation. Residential development can also include ancillary development of landscaped areas, recreation open space, playing fields and other local community facilities which are required to ensure adequate provision in the area, in view of the additional demands arising from the proposed development.</p>	
<p>Mod – MOD/PF/H/40</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Monitoring</p> <p>IR – Policy Framework, Pages 67 to 73</p>	<p>6.12 Residential development is meant in its widest sense, including housing constructed by the market and Registered Social Landlords (RSLs), but also includes institutions, e.g. rest homes, nursing homes and care homes, as well as sheltered housing and student accommodation. Residential development can also include ancillary development of landscaped areas, recreation open space, playing fields and other local community facilities which are required to ensure adequate provision in the</p>	<p>Monitoring</p> <p>6.12 Residential development is meant in its widest sense, including housing constructed by the market and Registered Social Landlords (RSLs), but also includes institutions, e.g. rest homes, nursing homes and care homes, as well as sheltered housing and student accommodation. Residential development can also include ancillary development of landscaped areas, recreation open space, playing fields and other local community facilities which are</p>	<p>Paragraph 6.12 of the Housing Chapter needs amending, and supplementing, as a consequence of other changes within the chapter to reflect the Inspector's Report.</p>

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	<p>area, in view of the additional demands arising from the proposed development.</p>	<p>required to ensure adequate provision in the area, in view of the additional demands arising from the proposed development. <i>The new policy direction for the delivery of housing through the planning system, based on the 'plan, monitor and manage' approach, is set out in PPG3. Monitoring is central to this approach to planning and to achieving sustainable housing provision.</i></p> <p><i>6.12a An essential feature of this approach is that the housing requirement, and the way it is being met, should be kept under regular review. In particular, paragraph 76 of PPG3 states that effective monitoring is "essential to the strategy of maintaining an adequate supply of land for housing and to enable its managed release." Therefore, particularly following from the provisions of Policy H2:</i></p>	
<p>Mod – MOD/PF/H/41</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Monitoring</p> <p>IR – Policy Framework, Pages 67 to 73</p>		<p>Policy H3</p> <p>THE COUNCIL WILL REGULARLY MONITOR THE ANNUAL ADDITIONS OF DWELLINGS WITHIN THE DISTRICT. MONITORING WILL BE UNDERTAKEN ON AN ANNUAL BASIS, LEADING TO THE PUBLICATION OF AN ANNUAL REPORT ON THE RESULTS OF THE MONITORING EXERCISE. THESE RESULTS WILL BE A MATERIAL CONSIDERATION IN DETERMINING WHETHER TO MAKE AN</p>	<p>The Council accepts the need for a monitoring policy and lower case text, as recommended by the Inspector. However, the Council has not accepted the Inspector's recommendation to number the new monitoring policy as H2, numbering it as H3 instead. If the monitoring policy became the new H2 then all the Phase 2 housing sites, currently referenced H2, would have to be re-referenced. Part of the new Phase 2 site references would be the notation 'H3', as the originating policy covering Phase 2 housing sites. This would confuse users of the plan into thinking that H3 sites were Phase 3 sites and that there were no Phase 2 sites. This is of particular importance as there were objectors to the plan who were seeking a third phase of the plan, with its own allocation of housing sites.</p> <p>In addition, the Council considers it preferable to document the</p>

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		<i>EXCEPTION TO THE PHASING PROVISIONS, AS SET OUT IN POLICY H2.</i>	phasing policies before the monitoring policy, which elaborates on some of the provisions of the Phase 2 Housing policy. Existing Policy H3 is renumbered accordingly.
Mod – MOD/PF/H/42 UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Monitoring IR – Policy Framework, Pages 67 to 73		<i>6.12b Monitoring is part of the Council's wider role in pursuing progress in the implementation of housing allocations, particularly those in Phase 1. Without this, there is a danger that the housing requirement would not be met, and that less sustainable sites would have to be brought forward, unnecessarily, from Phase 2.</i> <i>6.12c Monitoring is also essential to assessing the effectiveness of the policies in the Plan and providing base data for a subsequent review of the Plan. The Performance Framework of the Plan is documented in paragraphs 3.99-3.100.</i>	<p>The Council accepts the need for the insertion of lower case text, as recommended by the Inspector. However, the Council has not accepted the Inspector's recommendation to solely insert one new paragraph of text immediately following the new monitoring policy, nor to number the new monitoring policy as H2.</p> <p>To fully justify and expand upon the new policy, the Council has inserted a series of new paragraphs that precede and follow the new policy H3.</p> <p>The Council's decision not to accept the Inspector's recommendation on the number of the new monitoring policy is justified at SD/PF/H/2.</p>
Mod – MOD/PF/H/43 UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Monitoring IR – Policy Framework, Pages 67 to 73		<i>6.12d Paragraph 77 of PPG3 lists the features of the housing supply and characteristics of new residential development which will be central to monitoring activity. These are:</i> <ul style="list-style-type: none"> <i>• Numbers of dwellings provided in a plan area;</i> <i>• Proportion of dwellings provided on previously developed land or by the re-use of existing buildings;</i> <i>• Number of dwellings provided on windfall sites;</i> <i>• Numbers of affordable dwellings provided;</i> 	For the reasons set out in the Inspector's Report.

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		<ul style="list-style-type: none"> • <i>The variety of types and mix of sizes of housing;</i> • <i>Density of new development; and</i> • <i>Car parking provision.</i> <p>6.12e <i>An analysis of these features would be carried out by the Council and would be based upon:</i></p> <ul style="list-style-type: none"> • <i>The various components of supply comprising infill, conversions, windfall and allocations;</i> • <i>The location of the development in relation to the sequential approach to housing provision, noted in paragraphs 3.82c;</i> • <i>The location of development in relation to good quality public transport corridors and the City and town centres noted respectively in paragraphs 3.72 and 7.17;</i> • <i>The detailed advice in the good practice guide to PPG3, “Monitoring Provision of Housing through the Planning System Towards Better Practice”.</i> 	
<p>Mod – MOD/PF/H/44</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Monitoring</p> <p>IR – Policy Framework, Pages 67 to 73</p>		<p>6.12f <i>It is the Council's intention to undertake monitoring on an annual basis and to produce an annual monitoring report as soon as practical thereafter. Data collection, analysis and reporting for the annual monitoring report will be co-ordinated with that required for other returns to Government and the Regional Assembly to</i></p>	<p>For the reasons set out in the Inspector's Report.</p>

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		<i>maximise efficiency and effectiveness.</i>	
<p>Mod – MOD/PF/H/45</p> <p>UDP - Policies H1 & H2 & Paragraphs 6.5-6.12, Monitoring</p> <p>IR – Policy Framework, Pages 67 to 73</p>		<p>6.12g <i>The Council recognises that the house-building industry delivers the housing supply. It also appreciates the contribution the industry can make to monitoring, as it has particular knowledge that might not otherwise be available to the Council. The Council looks forward to creating a constructive dialogue, including meetings, and to the sharing of information for mutual benefit.</i></p>	For the reasons set out in the Inspector's Report.
<p>Mod – MOD/PF/H/46</p> <p>UDP – Policy H3: Protecting Allocated Housing Sites</p> <p>IR – Policy Framework pages 73 & 74</p>	<p>Policy H3</p> <p>PROPOSALS FOR USES OTHER THAN RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS HOUSING WILL NOT BE PERMITTED UNLESS IT CAN BE DEMONSTRATED THAT THE LONG TERM DEVELOPMENT OF THAT SITE FOR RESIDENTIAL PURPOSES IS SEVERELY PREJUDICED, WITH THE EXCEPTION OF PROPOSALS FOR A TEMPORARY USE UNDER POLICY H4.</p>	<p>Policy H3 H4</p> <p>PROPOSALS FOR USES OTHER THAN RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS HOUSING WILL NOT BE PERMITTED UNLESS IT CAN BE DEMONSTRATED THAT THE LONG TERM DEVELOPMENT OF THAT SITE FOR RESIDENTIAL PURPOSES IS SEVERELY PREJUDICED, WITH THE EXCEPTION OF PROPOSALS FOR A TEMPORARY USE UNDER POLICY H4.</p>	<p>The Council accepts the recommendation to delete the final section of the policy for the reasons set out in the Inspector's Report.</p> <p>As a consequence of the new policy on monitoring and the deletion of RDDP Policy H4, on 'Temporary Uses on Phase 2 Housing Sites', this policy on 'Protecting Allocated Housing Sites' is renumbered as Policy H4.</p>
<p>Mod – MOD/PF/H/47</p> <p>UDP – Policy H4: Temporary Uses on Phase 2 Housing Sites</p> <p>IR – Policy Framework pages 74 &</p>	<p>Policy H4</p> <p>PROPOSALS FOR USES OTHER THAN RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS A PHASE 2 HOUSING SITE MAY BE PERMITTED FOR A TEMPORARY PERIOD IF THE PROPOSAL WOULD NOT PREJUDICE THE DEVELOPMENT</p>	<p>Policy H4</p> <p>PROPOSALS FOR USES OTHER THAN RESIDENTIAL DEVELOPMENT ON ANY SITE ALLOCATED ON THE PROPOSALS MAPS AS A PHASE 2 HOUSING SITE MAY BE PERMITTED FOR A TEMPORARY PERIOD IF THE PROPOSAL WOULD NOT</p>	For the reasons set out in the Inspector's Report.

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75	<p>OF THE SITE FOR RESIDENTIAL PURPOSES DURING PHASE 2 OF THE PLAN.</p> <p>6.14 The determination of applications for permission for a temporary period will depend on the nature of the proposal and its proposed timing in relation to the life of the plan. Applications for temporary uses will also be tested against other relevant policies elsewhere in the plan.</p>	<p>PREJUDICE THE DEVELOPMENT OF THE SITE FOR RESIDENTIAL PURPOSES DURING PHASE 2 OF THE PLAN.</p> <p>6.14 The determination of applications for permission for a temporary period will depend on the nature of the proposal and its proposed timing in relation to the life of the plan. Applications for temporary uses will also be tested against other relevant policies elsewhere in the plan.</p>	
<p>Mod – MOD/PF/H/48</p> <p>UDP – Paragraph 6.15</p>	<p>6.15 Not all the housing delivered during the plan period will be on allocated sites shown on the Proposals Maps and protected by policy H3. The components of supply are shown in the lower case text to policy UDP5. Protection also needs to be applied to the other sources of supply, in line with paragraph 22 of PPG3, to maximise the re-use of urban land and buildings for housing, and minimise the amount of greenfield land being taken for residential development. Policy UR4 also seeks to prioritise housing development wherever possible. Therefore:</p>	<p>6.15 Not all the housing delivered during the plan period will be on allocated sites shown on the Proposals Maps and protected by policy H3. The components of supply are shown in paragraphs 6.4 to 6.ac the lower case text to policy UDP5. Protection also needs to be applied to the other sources of supply, in line with paragraph 22 of PPG3, to maximise the re-use of urban land and buildings for housing, and minimise the amount of greenfield land being taken for residential development. Policy UR4 also seeks to prioritise housing development wherever possible. Therefore:</p>	The amended text is as a consequence of other changes within the chapter to reflect the Inspector's Report.
<p>Mod – MOD/PF/H/49</p> <p>UDP – Paragraphs 6.17 & 6.18</p> <p>IR – Policy Framework pages 76 & 77</p>	<p>6.17</p> <p>6.18 Non-Residential buildings should be considered first for residential development. However, it is recognised that in some of the District's housing and commercial markets, financial constraints may make housing an economically</p>	<p>6.17</p> <p>6.18 Non-Residential buildings should be considered first for residential development, except where the existing use is protected by another policy of this plan. However, it is recognised that in some of the District's housing and</p>	For the reasons set out in the Inspector's Report.

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	<p>unviable option for the foreseeable future. If non-residential uses are proposed, applicants will be required to demonstrate that a residential use is economically unviable for the foreseeable future. Agricultural buildings in rural areas should be considered first for business use in accordance with policies UR4 and E5A.</p>	<p>commercial markets, financial constraints may make housing an economically unviable option for the foreseeable future. If non-residential uses are proposed, applicants will be required to demonstrate that a residential use is economically unviable for the foreseeable future. Agricultural buildings in rural areas should be considered first for business use in accordance with policies UR4 and E5A.</p>	
<p>Mod - MOD/PF/H/50</p> <p>UDP – Policies H7 and H8, paragraph 6.22</p> <p>IR – Policy Framework, pages 77 to 79</p>	<p>6.22 There is an expectation that the House Building Industry will seek to make the most efficient use of land to play a full role in the implementation of PPG3, and the Council will seek to achieve this through the Development Control process. The following are some of the factors that will assist in determining whether a development scheme makes the most efficient use of land for residential development, and satisfies the provisions of policies H7 and H8. They should not be seen as a list of mitigating factors to avoid the requirements of policies H7 and H8.</p> <ul style="list-style-type: none"> • The size and character of the site. • The size and character of the building. • The adjacent transport network, relevant to the proposed development: existing capacity and potential for increased capacity. • The type and size of housing needed in the community, 	<p>6.22 There is an expectation that the House Building Industry will seek to make the most efficient use of land to play a full role in the implementation of PPG3, and the Council will seek to achieve this through the Development Control process. The following are some of the factors that will assist in determining whether a development scheme makes the most efficient use of land for residential development, and satisfies the provisions of policies H7 and H8. They should not be seen as a list of mitigating factors to avoid the requirements of policies H7 and H8.</p> <ul style="list-style-type: none"> • The size and character of the site. • The size and character of the building. • The adjacent transport network, relevant to the proposed development: existing capacity and potential for increased capacity. • The type and size of housing needed in the community, 	<p>For the reasons set out in the Inspector's Report.</p>

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	<p>particularly identified through the work of the Bradford Housing Partnership (see paragraph 6.23-6.28).</p> <ul style="list-style-type: none"> • Area initiatives, such as Conservation, Regeneration. • Parking standards, driveways, road and footpath layouts, and efficiency of provision. 	<p>particularly identified through the work of the Bradford Housing Partnership (see paragraph 6.23-6.28).</p> <ul style="list-style-type: none"> • Area initiatives, such as Conservation, Regeneration. • Parking standards, driveways, road and footpath layouts, and efficiency of provision. 	
<p>Mod – MOD/PF/H/51</p> <p>UDP - Policy H9 – Affordable Housing</p> <p>IR – Policy Framework, Pages 81-5</p>	<p>Affordability in the Bradford Metropolitan District.</p> <p>6.23 The affordable housing situation in the Bradford Metropolitan District is described in the current Joint Housing Strategy (JHS), for the period 2000-2010, and the related documentation of the Action Plans (AP) for 2000-2001 and the Local Housing Assessment 2000 (LHA), produced by the Bradford Housing Forum. The LHA was undertaken before the publication of Local Housing Needs Assessments: A Guide to Good Practice by DETR in 2000.</p>	<p>Affordability in the Bradford Metropolitan District.</p> <p>6.23- The affordable housing situation in the Bradford Metropolitan District is described in the current Joint Housing Strategy (JHS), for the period 2000-2010, and the related documentation of the Action Plans (AP) for 2000-2001 and the Local Housing Assessment 2000 (LHA), produced by the Bradford Housing Forum. The LHA was undertaken before the publication of Local Housing Needs Assessments: A Guide to Good Practice by DETR in 2000.</p> <p>6.23 <i>Government Circular 6/98 states that affordable housing policies within development plans should be based on a clear and up to date assessment of the local need for affordable housing. A range of research and survey work has been carried out by the Council and its partners, informing both the Replacement Plan and its affordable housing policies and the Council's wider housing strategy.</i></p>	For the reasons set out in the Inspector's Report.

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		<p><i>This up to date assessment is found within the following documents:</i></p> <ul style="list-style-type: none"> • <i>Modelling Housing Markets In Bradford 2000 – research carried out for the Council by the Northern Consortium of Housing Authorities providing a comprehensive overview of the housing situation in Bradford across all tenures and geographical areas;</i> • <i>Local Housing Assessment 2000 – produced by the Bradford Housing Forum and Bradford Council;</i> • <i>The Joint Housing Strategy 2000-2010 – which based in part on the above documents, provides a clear assessment the affordability issues across the district and proposals for addressing them.</i> • <i>A decent home in a Decent Neighborhood – Joint Housing Strategy 2003-2010 – which updates the above document.</i> 	
<p>Mod – MOD/PF/H/52</p> <p>UDP - Policy Framework, Paragraph 6.27</p> <p>IR – Policy Framework, Pages 81-5</p>	<p>6.27 Objective 5 of the JHS is to “Ensure a sufficient supply of affordable and social rented housing in the places where people need it”. Action to achieve this involves the application of varying quotas to private housing developments for the provision of affordable housing, based on need in different market areas, through policies of the UDP and the Development Control process. The JHS expresses the quotas as a percentage of the total development by Housing Market Area. They are:</p>	<p>6.27 Objective 5 of the JHS is to “Ensure a sufficient supply of affordable and social rented housing in the places where people need it”. Action to achieve this involves the application of varying quotas to private housing developments for the provision of affordable housing, based on need in different market areas, through policies of the UDP and the Development Control process. The JHS expresses the quotas as a percentage of the total development by Housing Market Area. They are:</p>	<p>In addition to the modifications explained above the Council has also incorporated the requirement for a 15% affordable housing contribution within the Bradford and Keighley Inner and Suburban Areas specifically to meet the needs of the Black and Minority Ethnic Communities and the Elderly.</p> <p>The Council has also clarified that there is no percentage target in the Peripheral Local Authority Housing Estates.</p> <p>Both of these modifications are as set out in the Core Proof of Evidence submitted to the Inquiry and considered by the Inspector without adverse comment.</p>

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	<p>Wharfedale 40% Airedale 30% The Villages 25% Bradford Suburbs and Keighley Suburbs 15%. There is no percentage target for Bradford Inner City or Keighley Inner City.</p>	<p>Wharfedale 40% Airedale 30% The Villages 25% Bradford Suburbs and Keighley <i>Inner and Suburbs</i> 15%*. * To meet the needs of the Black and Minority Ethnic (BME) communities and the elderly.</p> <p>There is no percentage target for Bradford Inner City or Keighley Inner City. the Peripheral Local Authority Housing Estates.</p>	
<p>Mod – MOD/PF/H/53</p> <p>UDP - Policy H9 – Affordable Housing</p> <p>IR – Policy H9 – Affordable Housing</p>	<p>Policy H9</p> <p>ON PLANNING APPLICATIONS FOR SUBSTANTIAL RESIDENTIAL DEVELOPMENT THE COUNCIL WILL NEGOTIATE FOR A PROPORTION OF AFFORDABLE HOUSING BASED ON THE EXTENT AND TYPE OF NEED AND THE SUITABILITY OF THE SITE OR BUILDING IN THE CASE OF CONVERSIONS. PRIOR TO DEVELOPMENT COMMENCING THE DEVELOPER WILL BE REQUIRED TO CONCLUDE ARRANGEMENTS TO ENSURE THE AFFORDABLE HOUSING REMAINS AFFORDABLE IN PERPETUITY.</p>	<p>Policy H9</p> <p>ON PLANNING APPLICATIONS FOR SUBSTANTIAL RESIDENTIAL DEVELOPMENT THE COUNCIL WILL NEGOTIATE FOR A PROPORTION OF AFFORDABLE HOUSING BASED ON THE EXTENT AND TYPE OF NEED, AND THE SUITABILITY OF THE SITE OR BUILDING IN THE CASE OF CONVERSIONS, AND THE ECONOMICS OF PROVISION. PRIOR TO DEVELOPMENT COMMENCING THE DEVELOPER WILL BE REQUIRED TO CONCLUDE ARRANGEMENTS TO ENSURE THE AFFORDABLE HOUSING REMAINS AFFORDABLE IN PERPETUITY.</p>	<p>The Council accepts the Inspector's comment that in order to more closely accord with the advice within Circular 6/98 , Policy H9 should be amended to make reference to the economics of provision. This reflects the fact that there will be occasions where negotiations on the required affordable housing element need to take account of abnormal development costs.</p> <p>The Council accepts the Inspector's comments in paragraph 6.115 of his report. Reference within the policy to perpetuity will therefore be deleted.</p>
<p>Mod – MOD/PF/H/54</p> <p>UDP - Policy H9 –</p>	<p>6.34 For the purposes of the policy substantial means sites of 1 hectare and above or developments yielding</p>	<p>6.34 For the purposes of the policy substantial means sites of 1 hectare and above or developments yielding</p>	<p>The Council acknowledges that Circular 6/98 allows Local Planning Authorities to adopt lower thresholds for smaller rural settlements. However both the Circular and Policy H4c of Regional Planning</p>

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Affordable Housing IR – Policy Framework, Pages 81- 5	25 dwellings or more. This follows the advice in paragraph 10 of Circular 6/98 and the provisions of the Council's SPG. Irrespective of the thresholds, policy H9 will apply to developments which have been manipulated in size, either area or yield, or constitute piecemeal development, in an attempt to avoid the provision of affordable housing. Developers are also encouraged to provide affordable housing on sites which fall below the threshold, in line with paragraph 11 of Circular 6/98, if there is a proven need.	25 dwellings or more. This follows the advice in paragraph 10 of Circular 6/98 and the provisions of the Council's SPG. <i>Although Circular 6/98 allows for the inclusion of lower thresholds for smaller settlements under 3,000 population where based on detailed local evidence, this universal threshold reflects the information available to the Council at this time. Nevertheless developers are encouraged to provide affordable housing on sites which fall below the threshold, in line with paragraph 11 of Circular 6/98, if there is a proven need.</i> Irrespective of the thresholds, policy H9 will apply to developments which have been manipulated in size, either area or yield, or constitute piecemeal development, in an attempt to avoid the provision of affordable housing. Developers are also encouraged to provide affordable housing on sites which fall below the threshold, in line with paragraph 11 of Circular 6/98, if there is a proven need.	Guidance indicate that these should only be included where there is evidence in the form of detailed local assessments of need to support such a lower threshold. It should be noted that not only does there have to be evidence of such a need, but that this evidence also needs to be in a form which would indicate what specific alternative threshold would be appropriate. In the absence of such evidence - as is the case in Bradford - it is therefore reasonable to adopt a universal threshold applicable to all settlements. The universal threshold incorporated within the rUDP was chosen to accord with the advice within paragraph 10 of Circular 6/98. It should also be borne in mind that even without the addition of a separate lower threshold, the plan allows for negotiation of an affordable housing element on smaller sites where justified by proven local need. This allows for any future situation where new evidence of local needs within smaller settlements becomes available to the Council. Finally there are in fact only a few defined settlements which are excluded from the green belt and which have populations below 3,000 to which such a separate lower threshold approach would apply. Additional text will therefore be added to the policy justification to explain why a universal threshold rather than differential thresholds has been adopted.
Mod – MOD/PFH/55 UDP - Policy H9 – Affordable Housing IR – Policy Framework, Pages 81- 5	6.35 In implementing the policy the Local Planning Authority will normally ask developers to enter into a Planning Obligation under S106 of the Town and Country Planning Act 1990 (as amended) to ensure the affordable housing is built. The use of planning conditions will also be considered where appropriate.	6.35 In implementing the policy the Local Planning Authority will normally ask developers to enter into a Planning Obligation under S106 of the Town and Country Planning Act 1990 (as amended) to ensure the affordable housing is built. The use of planning conditions will also be considered where appropriate. <i>In accordance with Circular 6/98, planning conditions or obligations will, where justified, be used to ensure</i>	The Council accepts the Inspector's comments in paragraph 6.115 of his report. An addition to the text in paragraph 6.35 of the rUDP referring to the use of planning conditions and obligations will therefore be made and Policy H9 modified accordingly (see above).

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<p>Mod – MOD/PF/H/56</p> <p>UDP - Policy H9 – Affordable Housing</p> <p>IR – Policy Framework, Page 85-6</p>	<p>6.36 The JHS, AP and LHA will be used to provide the basis for assessing the need for affordable housing, and the quantity required, on a site-specific basis. In assessing whether there is a need for affordable housing the overall situation for the Housing Market Area will be a relevant consideration. So too will be other matters at the Local Housing Area level, for example, the dwelling stock profile, the local affordability ratio, the need for social rented housing and the land supply. Affordable Housing will only be provided, therefore, where there is a need.</p>	<p><i>that the affordable housing remains affordable in perpetuity.</i></p> <p>6.36 The JHS, AP and LHA will be used to provide the basis for assessing the need for affordable housing, and the quantity required, on a site-specific basis. In assessing whether there is a need for affordable housing the overall situation for the Housing Market Area will be a relevant consideration. So too will be other matters at the Local Housing Area level, for example, the dwelling stock profile, the local affordability ratio, the need for social rented housing and similar shared equity schemes, and the land supply. Affordable Housing will only be provided, therefore, where there is a need.</p>	<p>For the reasons set out in the Inspector's Report.</p>
<p>Mod – MOD/PF/H/57</p> <p>UDP - Policy H9 – Affordable Housing</p> <p>IR – Policy Framework, Pages 81-5</p>	<p>6.39 An assessment of the likely provision of affordable housing through Policy H9 has been carried out based on the percentage quotas for Housing Market Areas. If all allocated sites, excluding those under construction and those with a true yield, above the threshold delivered these quotas, nearly 2200 affordable units could be provided over the lifetime of the Plan, with over 1100 during Phase 1 and over 1000 during Phase 2. In addition, affordable units will also be delivered on allocated sites both under construction and with a true yield, as well as through the application of Policy H9 to building conversions and windfall sites.</p>	<p>6.39 An assessment of the likely provision of affordable housing through Policy H9 has been carried out based on the percentage quotas for Housing Market Areas, noted in paragraph 6.27. If all allocated sites above the threshold, excluding those under construction; and those with planning permission for a true yield (as noted in paragraph 6.4g), at the base date of the Plan; and those sites granted planning permission between the base date and the Public Inquiry (as noted in paragraphs 6.4s and 6.4t), above the threshold delivered these quotas, nearly 2200 over 1800 affordable units could be provided over the lifetime of the Plan, with over 1100 900 during Phase 1 and over 1000 900 during Phase 2. In addition,</p>	<p>The Council accepts the recommendation for the reasons set out in the Inspector's Report.</p>

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		affordable units will also be delivered on allocated sites both under construction and with a true yield planning permission (as noted above) , as well as through the application of Policy H9 to building conversions and windfall sites.	
Mod – MOD/PF/H/58 UDP - Policy H10 – Rural Exceptions IR – Policy Framework, Page 86	6.41 Proposals to construct dwellings offering a discounted initial purchase price only or which include an element of open market housing are not considered to fall within this policy.	6.41 <i>The general need for affordable housing in the rural parts of the district is set out within the Joint Housing Strategy prepared by the Bradford Housing partnership and within paragraphs 6.26-7 of this plan. For the purposes of this policy the Council will use the Local Housing Areas set out in 'Local Housing Assessments 2000' as the starting point in defining 'local' need. However other information such as existing or future local housing needs surveys carried out by the district's Rural Housing Enablers may also be used.</i> Proposals to construct dwellings offering a discounted initial purchase price only or which include an element of open market housing are not considered to fall within this policy.	<p>Proven local need is difficult to define in a precise geographical way. It is usually considered in terms of households being unable to access market accommodation and, therefore, being forced either to move away from their place of employment or their network of friends, family or institutional support.</p> <p>However the Council accepts the Inspector's view that it would be helpful to the user of the Plan if the text justifying Policy H10 clarifies what may constitute 'proven local need'. In general terms the need for affordable housing in the rural parts of the district is set out within the Joint Housing Strategy produced by the Bradford Housing Partnership. In geographical terms the best available way of defining 'local' would be to use the Local Housing Areas defined within the report 'Local Housing Assessments 2000' since these areas have been defined as a result of actual research into local housing markets. This would therefore be preferable than using more arbitrary administrative boundaries such as wards or parishes.</p> <p>The Council and the Countryside Agency currently jointly fund a Rural Housing Enablers post which has and will continue to carry out detailed local needs surveys which may also be relevant.</p>