

Bradford Core Strategy

Partial Review



Preferred Options

Regulation 18

July 2019

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Scope of the consultation

<p>What is this document?</p>	<p>This document sets out the preferred options for the Bradford Core Strategy Partial Review (CSPR). It provides the Council’s preferred policy options for strategic growth, housing, employment, transport and environmental issues.</p>
<p>Purpose and scope of the consultation:</p>	<p>We are seeking views on:</p> <ul style="list-style-type: none"> • The preferred option policies and any suggested changes. • Alternatives to the preferred policy options. • Comments on supporting documentation.
<p>Geographical scope:</p>	<p>The proposals in this document relate to the Bradford District.</p>
<p>Impact assessment and other supporting documents:</p>	<p>A number of impact assessments will support the preparation of the CSPR, including:</p> <p>Sustainability Appraisal (SA) (including Strategic Environmental Assessment (SEA) – Scoping Report; Sustainability Appraisal (SA) (including Strategic Environmental Assessment (SEA) – Draft Report; Habitats Regulation Assessment (HRA) ; Equalities Impact Assessment (EqIA); Health Impact Assessment (HIA); Core Strategy Partial Review Scoping Report - Statement of Consultation.</p> <p>A range of evidence material has also been produced to support the plan and is available on the Council’s website.</p>

Basic information

<p>Timescale of consultation:</p>	<p>This consultation will begin on 30th July 2019 and end at 5pm on 24th September 2019</p>
<p>How to respond</p>	<p>The consultation will be carried out in accordance with the Council's Statement of Community Involvement (SCI) and national guidance.</p> <p>The consultation documents will be made available on the Bradford Council website. Paper copies of the documents will be provided at the following locations and will be available to view during normal opening hours:</p> <p> Britannia House Bradford City Library Bradford Local Studies Library Keighley Town Hall Keighley Library Shipley Library Bingley Library Ilkley Library </p> <p>If you wish to make a representation to the consultation please visit: www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/ to complete the online survey or download documents, including the electronic comments form. To assist in the swift and cost efficient processing of representations we are encouraging the use and completion of the online survey.</p> <p>email: planning.policy@bradford.gov.uk</p> <p>(Please title your email 'Core Strategy Partial Review')</p> <p>Post: Core Strategy Partial Review, Department of Place, Local Plans Team, 4th Floor, Britannia House, Bradford, BD1 1HX</p>
<p>Enquiries</p>	<p>If you have any enquiries regarding this consultation please contact the Local Plans Team.</p> <p>Email: planning.policy@bradford.gov.uk</p> <p>Phone: 01274 433679</p>
<p>Confidentiality and data protection</p>	<p>Data Protection Act 2018</p> <p>Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 the personal information you provide will only be used by the Council for the purpose of preparing the Local Plan.</p>

	<p>Local Plans Privacy Statement</p> <p>Sets out how the City of Bradford Metropolitan District Council (CBMDC) Local Plans team processes your personal data. This notice should also be read in conjunction with the Council's Corporate Privacy Notice and other specific service notices, which are available to view at: https://www.bradford.gov.uk/privacy-notice/</p>
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Welcome



Core Strategy Partial Review – Preferred Options

A.1 Core Strategy Partial Review

A.1.1 The Core Strategy forms an essential part of the Local Plan for Bradford setting out the strategic planning policies for the District and the key policies to help determine planning applications. It covers a broad range of important policy topics, including housing, employment, transport, retail, leisure and environmental policy areas. With such a focus it is vital that the Core Strategy is both relevant and up to date. In light of significant changes to national planning policy and local strategies since the plan was adopted, the Council started consultation on the scope of a formal review of the plan in January 2019.

A.1.2 National planning policy and guidance has undergone a range of significant changes since the adoption of the existing Core Strategy with the National Planning Policy Framework last updated in February 2019. Major changes have included:

- the introduction of a standard method to the calculation of housing need;
- widening definitions of affordable housing;
- reinforcing the importance of examining all reasonable alternatives before concluding that exceptional circumstances may exist to justify changes to Green Belt boundaries, and
- ensuring that site deliverability and viability are central to plan-making.

There is also discussion nationally about how the planning system should support the transition to a low carbon future, particularly in light of climate change and the introduction of bio-diversity net gain for developments to help protect and grow our natural capital.

A.1.3 In addition to changes in national policy the review has also been stimulated by the adoption of a new local economic growth strategy and a clear focus upon the development and delivery of major transport projects including Northern Powerhouse Rail.

A.1.4 Earlier this year we asked for views on the scope of the review and the key policies which should be subject to the review and in response received over 1,600 individual comments. This publication considers the representations made during this stage of the consultation, together with a wide range of new evidence material to establish the Council's preferred policy options.

A.2 Preparation of the Review

A.2.1 The Core Strategy Partial Review is accompanied by an extensive set of new technical evidence to support the various policy positions taken within the review. These include:

- Strategic Housing and Market Assessment (SHMA) Draft Report and Household Survey.
- Gypsy and Traveller and Travelling Showperson Accommodation Assessment Draft Report
- Employment Needs Assessment and Land Review (Part 1) Draft Report
- Retail and Leisure Study Draft Report
- Local Infrastructure Plan (Baseline Report)
- Strategic Flood Risk Assessment (SFRA) Level 1 Draft Report
- Whole Plan Viability Assessment Initial Findings Report

A.2.2 In addition to technical evidence the plan has also been developed in consideration of various impact appraisals and assessments including a Sustainability Appraisal (SA), Habitat Regulations Assessment (HRA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). Part of the suite of documents published alongside the CSPR also includes: the Green Belt Selective Review Methodology Draft Report (updated) and Site Assessment Methodology Draft Report (updated).

A.2.3 A comprehensive consultation statement is also published which details consultation themes and responses to issues raised and a draft Duty to Cooperate Statement identifying cross-border strategic planning issues. Key consultation themes have also been identified where applicable throughout the document.

A.2.4 As the Core Strategy review has progressed; its scope has extended beyond the original focus identified earlier this year and now covers:

- An updated **plan period**.
- **Strategic policies** – SC1: Overall Approach and key Spatial Priorities; SC2: Climate Change and Resource use; SC5: Location of Development; SC6: Green Infrastructure; SC7: Green Belt; SC8: Protecting the South Pennine Moors and their Zone of Influence; new policy SC10: Creating Healthy Places.
- All **Sub-Area Policies**.
- **Economy** – EC1: Creating a successful and competitive Bradford District economy within the Leeds City region; EC2: Employment Land, Jobs and Skills Development; EC3: Employment Land and Skills Requirements and EC5: City, Town, District and Local Centres.
- **Transport** – TR1: Travel Reduction and Modal Shift; TR2: Parking Policy; TR3: Integrating Sustainable Transport and Development; TR5: Strategic Transport Delivery; TR6: Freight.
- **Housing** – HO1: the District's Housing Requirement; HO2: Strategic Source of Supply; HO3: Distribution of Housing Development; HO4: Phasing the Release of Housing Sites; HO5: Density of Housing Schemes; HO6: Maximising the Use of PDL; HO8: Housing Mix; HO9: Housing Quality; HO11: Affordable Housing; HO12: Provision of Sites for Gypsies, Travellers and Travelling Showpeople.

- **Environment** – EN2 Biodiversity and Geodiversity (now split into two policies and integrating bio-diversity net gain); EN5: Tree and Woodlands; EN5: Energy; EN7: Flood Risk and EN8: Environmental Protection.
- **Implementation and Delivery** – ID2: Viability.

Some of the policy titles have also changed to reflect updated priorities – particularly within the economic and transport sections. For ease of reference a table has been prepared in Appendix 1, which details the position of the review at the scoping stage and the updated position at Preferred Options.

A.3 Preferred Options - Key Directions

A.3.1 The Core Strategy Partial Review has taken a number of key directions, informed by the evidence base, as well as the evolving local and national policy priorities.

Balancing growth while protecting our local assets

A.3.2 The plan sets out planning policy to meet our revised housing growth needs in full which is to be delivered through maximising our brownfield regeneration opportunities and allowing a limited release of Green Belt land in sustainable locations. We are setting a reduced but still ambitious target for housing growth. The overall level of housing per annum is lowered from the adopted Core Strategy minimum need of 2,476 dwellings per annum to 1,703 dwellings per annum. The Council has applied the Government's Standard Method to setting the housing requirement and extensively tested this position.

A.3.3 Our Preferred Options also continue to include a clear focus upon maximising growth within built-up areas and on brownfield sites. It is estimated that approximately 21,000 homes or over 81% of our housing development will be within brownfield and non-Green Belt locations.

A.3.4 We are also continuing to grow Bradford as a vibrant, liveable and healthy city. Over 70% of the overall growth is focused within the Regional City which is a slight increase from 65.9% in the adopted Core Strategy. This approach clearly supports wider transformational and investment aims for Bradford, with the city centre seeing an increase in homes from 3,500 to 4,000.

A.3.5 To meet our housing needs in full the Council will also need to find residential land for approximately 5,000 homes in the Green Belt – this is significantly less than the 11,000 through the adopted Core Strategy. The Council's Preferred Options have reduced the number of areas where a change to the Green Belt is proposed from 23 out of the 27 settlements and sub areas in the adopted Core Strategy to 12 in this publication.

Investing in regeneration opportunities

- A.3.6 The Council is committed to aligning infrastructure and growth areas including the Shipley and Canal Road Corridor and now has a unique pipeline of transformative transport and development projects to strengthen its focus upon brownfield regeneration and improve our connectivity and opportunities within the wider Leeds city region.
- A.3.7 The Northern Powerhouse Rail project and the ambitious plans for the City Region Transit Network create opportunities to not only dramatically improve connectivity but could act as catalysts for new residential and commercial development within key gateways and corridors. The city offer is further strengthened by the roll out of the Bradford Top of Town Townscape Heritage Scheme, Forester Square Station improvements, development of a new 'City Village' delivery masterplan and the £21m project to redevelop the city centre markets. The plan includes an updated focus upon our investment priorities.
- A.3.8 The District as a whole has some significant regeneration and neighbourhood renewal opportunities, including inner city locations such as Manningham, outer estates such as Holme Wood and towns and settlements such as Keighley. The plan includes a stronger focus upon area renewal and regeneration across the District, with strengthened sub area policies.

A greener and healthy place

- A.3.9 We have a clear need to reduce air pollution within our urban areas, minimise our carbon footprint and take positive steps to move towards more healthy places for all, supported by good quality walking, cycling and public transport infrastructure and improvements in green infrastructure and biodiversity.
- A.3.10 Our Preferred Options include a re-evaluation of our strategic planning policies to support the move towards a lower carbon use District. We have enhanced our policies to support the delivery of green streets, green infrastructure spaces and networks and ensure that communities are protected from flood risk through the integration of appropriate infrastructure, including sustainable drainage systems and tree planting.
- A.3.11 The Preferred Options also include a comprehensive new 'Creating Healthy Places' strategic policy which aims to maximise health and wellbeing gains from development proposals and ensuring that negative impacts are designed out or mitigated. We have also included within our Preferred Options a new policy focus upon bio-diversity net gain - which requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were found pre-development.
- A.3.12 Our preferred policies also include a stronger focus upon managing and improving existing rail, bus, cycle and walking networks to address congestion, improve air quality and encourage modal shift to sustainable transport modes and deliver

inclusive, accessible and legible routes, together with supporting the delivery of new park and ride facilities and electric vehicle charging infrastructure.

Supporting jobs, training and skills development

- A.3.13 The Preferred Options set out to support the delivery of at least 1,600 jobs per annum of 17 years (over 27,000 jobs), together with skills development and the need to refresh our portfolio of employment land to meet local business needs and attract investment to ensure Bradford competes on the global stage.
- A.3.14 The plan takes a more positive position than the updated regional economic forecasts and broadly aligns with job growth ambitions set out within the new economic growth strategy for the District. The Core Strategy Preferred Options also recognises the changing nature of employment and move towards part-time, 'double jobbing' and home working as well as more diversification in the range and types of jobs and growth sectors.
- A.3.15 Initiatives such as the new Business Development Zones (BDZs) offer opportunities for the intensification of employment uses and potentially higher job densities within established employment areas as well as accessibility and environmental improvements. The Preferred Options also recognises that there is a need for a real step change in employment land quality within the District – the current supply of employment land is under review with an estimated need for at least 60ha of good quality land, in the right locations to meet to the right needs.
- A.3.16 Our Preferred Options also updates the District's key growth sectors and includes innovative policies to support local skills, training and education through development projects.

Driving high quality housing and place-making

- A.3.17 The District has varied and changing housing requirements and there is a need to ensure we deliver a high quality well-balanced range and mix of housing to support our communities. The Council has surveyed extensively on local housing needs as part of its evidence base and it is clear that further thought and policy is required on planning for an ageing population, specialist housing and supporting self and custom build as well as ensuring we have the right level and type of affordable housing across the District.
- A.3.18 The evidence would also indicate that there is a need to see a step change in the quality of housing built in the District. Through the local plan we are proposing enhanced accessibility and wheelchair housing standards and minimum space standards. Policy is also supported by a new draft Homes and Neighbourhoods Design Guide SPD, which provides additional information about creating high quality housing and neighbourhoods.
- A.3.19 The Preferred Options continues to include support for housing and sustainable development protecting local character and creating distinctive neighbourhoods –

promoting higher density brownfield urban regeneration within the inner and outer city and town centres and around transport hubs. The plan also makes strong provision for a managed and where appropriate phased approach to housing delivery to ensure that the right infrastructure is delivered at the right time.

A.4 Timescales

- A.4.1 This Consultation Draft (Regulation 18) publication is issued for formal consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation is scheduled for eight weeks, rather than the statutory minimum of six weeks to take into consideration the summer holiday period.
- A.4.2 During the period in which this publication is out for consultation, work will continue to progress to finalise the site assessment analysis and technical evidence to allow the Council to then publish its Consultation Draft (Regulations 18) Allocations DPD in Autumn 2019.
- A.4.3 The Council is intending to consult on both its Submission Draft (Regulation 19) Core Strategy Partial Review and Submission Draft (Regulation 19) Allocations DPD in early Summer 2020 prior to onward submission to the Secretary of State for public examination.

A.5 How to Use this Document

- A.5.1 The document broadly follows the structure and order of the adopted Core Strategy in terms of sections and key topics. Each reviewed or new policy area includes a section of explanation followed by the actual preferred policy option. The approach to marking changes to the policies follows a similar method to that used in the identification of modifications to plans with:
- green bold text and underline showing new text;
 - red bold text with strike-through showing suggested deletions, and
 - black bold text indicating original unaltered text
- A.5.2 The introductions and preambles to the policies are not fully developed 'reasoned justifications' but often summaries of issues and focused rationale. The Submission Draft version of the plan will include a full rewrite of the reasoned justification text to support the policies.
- A.5.3 Following each policy there is also information detailed on the considered 'reasonable alternatives' to the policy position taken by the Council. The full range of reasonable and unreasonable policy alternatives is detailed in the Draft Sustainability Appraisal.

- A.5.4 Each policy section is then concluded by a consultation question. The Council is keen to understand any comments on the policies themselves plus suggested changes. If you would support an alternative to the Preferred Options, there is also the opportunity to provide further details and evidence to support an alternative approach.
- A.5.5 Sections of the plan which relate to monitoring and indicators will be refreshed as the policies are finalised post this Consultation Draft and prior to the Submission Draft stage. Some of the appendices will also be updated at this stage.
- A.5.6 It is recommended that this consultation document is read alongside the technical evidence and impact assessments which accompany the plan. All these documents are available on the Council's website.
- A.5.7 If you have problems accessing or using this document the Local Plan Team can be contacted via e-mail: planning.policy@bradford.gov.uk or on: 01274 433679
Information on upcoming events and webinars are available at: www.bradford.gov.uk or follow-us on twitter: @BradfordPlan.

SECTION 1

Introduction



Section 1: Introduction

1.1 About

- 1.1.1 This section of the Core Strategy provides an explanation of the Local Plan and Core Strategy. It also sets out the stages to plan-making and the overall purpose of the Core Strategy and supporting documents.
- 1.1.2 In the Core Strategy Partial Review (CSPR) Scoping Document, the Council identified a need to update the plan period (currently 2013-2030), to comply with the new NPPF, and the need to ensure that strategic policies should look ahead over a minimum 15 year period from adoption¹.
- 1.1.3 In the CSPR scoping consultation the Council proposed to a revised plan period of 2020 to 2035. This was on the basis that the revised Core Strategy would be adopted in 2020. The Council is now proposing to make a change to the plan period noting that 2022 may be a more realistic adoption date for the updated Core Strategy.

1.2 What you told us

- 1.2.1 A wide range of comments were received on the plan period and the key issues raised are detailed below:
- Support for the proposed plan period of 2020-35.
 - Plan flexibility – need to ensure that plans are not too long and have flexibility in the short term to support implementation and respond to changes in local circumstances and uncertainties nationally about economic and population changes.
 - Potential plan delays – extending the plan period may lead to delays in implementation with the pressing need to tackle issues now, including climate change.
 - Infrastructure planning – need for the plan to include additional information and a clear focus upon the timely delivery of infrastructure, including healthcare, transport, parking, education, green spaces and recreational areas.
 - Overall plan period – the start date of the plan needs to be clarified and how unmet need is carried forward. There may be a need to extend the plan period further to 2036/37, noting the minimum 15 years advised by national policy.
 - There may be a need to extend the plan period to at least 2037 as a minimum in consideration that plan-making may take longer than first envisaged.
 - Benefits of long-range plans – longer term plans can be more strategic and have a wider reach in terms of issues and considerations.

¹ Except in relation to town centre development – see Chapter 7 of the NPPF (February 2019)

1.3 Evidence and Policy Directions

- 1.3.1 The demographic datasets used in the Strategic Housing Market Assessment (SHMA) have been run to at least 2037 and the economic forecasting used in the employment need and land analysis is generally projected forward by 12 years and then estimated forward to the end of the plan period.
- 1.3.2 In addition to the setting the plan period, the Council will also be establishing a limited quantity of safeguarded land to accommodate growth beyond the plan period and maintain the permanence of the Green Belt.

1.4 Plan Period - The Preferred Option

- 1.4.1 It is recognised that the Core Strategy needs to provide both longer range strategic direction but also flexibility to ensure that plans take account of changing local circumstances and national policy. Para 33 of the NPPF indicates that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and then be updated as necessary. National planning policy therefore builds in a requirement for regular local plan reviews. Para 33 also indicates that: 'Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future'.
- 1.4.2 The consultation on the CSPR submission draft (Regulation 19) is expected to commence in early summer 2020. Following this consultation and then formal submission of the CSPR for public examination to the Planning Inspectorate this may take the timetable for the CSPR through to late 2020 / early 2021. Much of the timetable for the public examination and any subsequent modifications will be led by the Planning Inspectorate, but there is a likelihood that following the examination, modifications and receipt of a positive inspector report that formal adoption of the updated Core Strategy may not take place until early 2022.
- 1.4.3 In light of these considerations, the Council is intending to reset the plan period from 2020 to 2037, which allows for a 17-year plan length and a forward view on strategic policies of 15 years from the date of anticipated adoption in 2022. By increasing the plan end-date from 2035 to 2037 this allows for slippage and uncertainties in the plan period and aims to ensure that the plan looks ahead over a minimum 15- year period from adoption.

Preferred Option: Plan Period: 2020-2037

1.5 Reasonable Alternatives – Plan Period

1.5.1 A number of reasonable alternatives to the Preferred Option have been considered and discounted. These include:

- 2013-2035/36/37 – this alternative results in technically a plan period of at least 22 years but a significant proportion of the plan is already set in the ‘past’ – the Government’s Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply.
- 2020-2035 – this alternative results in a 15-year plan period but the risk that if that plan is adopted in 2022, this will leave only 13 years for strategic policies.
- 2021-2037 – this alternative results in a 16-year plan period and 15 years for strategic policies (on adoption of the plan in 2022) – reduces forecast total dwelling need by one year and requires potentially up to two years of housing monitoring data from Preferred Options document stage (2019) to the start of the plan period (2021), with related uncertainties.
- 2022-2038 – this alternative results in a 16-year plan and 16 years for strategic policies (on adoption of the plan in 2022) – but requires potentially up to three years of housing monitoring data from Preferred Options document stage (2019) to the start of the plan period (2022), with related uncertainties.
- 2020-40 – this alternative produces a long range 20-year plan with 18-year strategic policies (on adoption in 2022), however the further the plan period, potentially the more unreliable the data with economic forecasts already stretched beyond their original 12 year base model period.

Consultation Question 1

Preferred Option: Plan Period

The adopted Core Strategy plan period currently runs from 2013 and covers the 17-year period to 2030.

National planning policy indicates that strategic policies should look ahead over a minimum 15-year period from adoption. The proposed plan period allows for a 17-year plan length and a forward view on strategic policies of 15 years from the date of anticipated adoption in 2022.

A revised plan period of 2020-2037 is proposed.

Q1. Please provide your comments for the preferred plan period and any suggested changes?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

SECTION 2

Background & Context



Section 2: Background and Context

2.1 About

2.1.1 This section of the current Core Strategy contains no policies but provides an overview of national and regional policy plus the key evidence material which underpins the plan and a general spatial overview. Due to changes in national policy and the evolving evidence base this section of the plan will require an update, which will be undertaken to coincide with the publication of the Regulation 19 consultation document. This will ensure that the publication draft of the Core Strategy is as up to date as possible for consultation and onward submission to the Secretary of State.



SECTION 3

Spatial Vision,
Objectives
& Core Policies



Section 3: Spatial Vision, Objectives and Core Policies

3.1 About

- 3.1.1 Section 3 of the Core Strategy sets the overall spatial vision for the District and how the plan will be delivered through its key strategic objectives and core policies. The core policies set out the overall approach of the plan, which is further developed through sub-area and topic specific planning policies.
- 3.1.2 The CSPR scoping consultation set out the requirement to formally review just one strategic policy – *SC7 Green Belt* but also indicated that there may be some consequential amendments to other strategic policies depending upon the outcomes from the evidence base and levels of growth proposed.
- 3.1.3 Since the CSPR scoping was undertaken, information from the consultation feedback, evolving local and national policy positions and evidence gathering has indicated the need to widen this review to include additional strategic policies within Section 3. The full range of strategic policies now under review are:
- *SC1 – Overall Approach and Key Spatial Priorities*
 - *SC2 – Climate Change, Environmental Sustainability and Resource Use*
 - *SC5 – Location of Development*
 - *SC6 – Green Infrastructure*
 - *SC7 – Green Belt and Safeguarded Land*
 - *SC8 – Protecting the South Pennine Moors and their Zone of Influence*
- 3.1.4 The CSPR scoping also indicated that there may be some additional new policies, which could be developed as part of the review. Strategic policy *SC10 Creating Healthy Places* has been added to the section as a new key overriding policy to ensure that healthy places and communities are central to Bradford's spatial strategy.

3.2 What you told us

- 3.2.1 Only Strategic Core Policy *SC7 Green Belt* was identified for formal review as part of the scoping stage and there are consequentially a large number of representations on this topic. The main themes from the consultation can be classified as follows:
- **Support for the strong protection of the Green Belt** – the use of Green Belt should be considered only as a last resort, following the use and regeneration of brownfield land.

- **Exceptional circumstances can be demonstrated for Green Belt release** to meet housing need which cannot be met through brownfield sites alone due to delivery and viability issues with urban sites.
- **Sensitive locations** – there are some particularly sensitive Green Belt locations which if lost may cause coalescence and merging of settlements.
- **Safeguarded land** – the Green Belt review is extended to include the identification of safeguarded land.

Detailed comments on Green Belt issues can be reviewed under the Statement of Consultation.

3.3 Findings and Policy Directions

3.3.1 There are a number of national policies and societal directions influencing elements of the strategic policies, these include briefly:

- A growing awareness and focus upon tackling climate change and reducing air pollution which requires a holistic and cross-cutting policy approach – the Council is one of a number of local authorities in the UK which has declared a climate emergency.
- Strengthening of policy in relation to Green Infrastructure to ensure that it is central to place-making, environmental improvements and healthy communities.
- Ensuring the Core Strategy effectively responds to the local health challenges within the Bradford District and also returns to the traditional planning concerns of health and wellbeing.

3.3.2 With the update to national planning policy in February 2019, Government has strengthened its policy direction on issues to be assessed before concluding that exceptional circumstances exist to justify changes to the Green Belt. The implications have been that the Council has reviewed further the use of suitable brownfield sites and underutilised land; optimises density forecasts and promoted a significant uplift in minimum density standards in sustainable locations and undertaken discussions with neighbouring authorities in relation to identified needs for development. With the need to meet our housing need, these assessments have indicated that exceptional circumstances exist for the limited release of Green Belt land, which is discussed further in the commentary to Strategic Policy *SC7 Green Belt and Safeguarded Land*.

3.4 Spatial Vision

3.4.1 Central to the Core Strategy for Bradford District is the long-term spatial vision that provides the framework for the development of the policies within the plan. The vision remains the same now as originally presented in the adopted Core Strategy. Only the end plan date has been updated.

'By ~~2030~~ 2037 the Bradford District:

Has become a key driver of the Leeds City Region's economy and a much sought after and desirable location where people want to live, do business, shop and spend their leisure and recreation time. The District has demonstrated that it is a place that encourages sustainable lifestyle choices and responds positively to the challenge of climate change.

The growth of the City of Bradford and the towns along Airedale and Wharfedale has been supported by a significant increase in the delivery of new houses, both market and affordable. This growth has driven the economic and social transformation of the District. Sustainable development and management has been at heart of this growth and prosperity. The District's unique landscapes, heritage and biodiversity assets have played a vital role in making great places that encapsulates what makes Bradford so special.

Economic transformation of the District has been achieved based on Bradford's key strengths of its unique young, growing and international workforce as well as its culture of entrepreneurship, high quality places where businesses can thrive and its rich historic and cultural identity and wealth of environmental assets'.

3.5 Strategic Objectives

- 3.5.1 The following objectives indicate how the spatial vision for Bradford District will be delivered by the Council and its partners in making planning and investment decisions. Many of these objectives are identified as corporate priorities while others reflect priorities embedded with regional and national plans and programmes. The changes and additions made to the adopted plan set out below reflect merging imperatives such as the need to improve air quality, revisions to the NPPF, and initiatives by the Council such as the production of a new Housing Design Guide.
- 3.5.2 The objectives are specific, achievable, attainable and realistic in what they seek to achieve in order to fulfil the vision over the plan period. The Performance Framework of the Core Strategy and the Annual Monitoring Report will measure whether the Council and its partners are meeting the spatial objectives.

The Spatial Vision for Bradford District will be achieved through the following strategic objectives:

- 1. To recognise and fully exploit the role of the City of Bradford and the towns along Airedale and Wharfedale as dynamic locations of choice for housing and economic growth within the Leeds City Region.**
- 2. To ensure that the District's needs for housing, business and commerce are met in full in sustainable locations that reduce the need to travel and are well served by public transport and services, whilst prioritising, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.**
- 3. Ensure that the appropriate critical infrastructure (including green and**

social) is delivered to support growth and the timing of development and infrastructure delivery are aligned.

4. To significantly improve the quality of new development and ensure that new housing schemes create inclusive, accessible, distinctive and healthy places that incorporate green streets and spaces and make efficient use of resources;

4 5. To provide a range of quality dwellings, in terms of type and affordability, in well-designed **liveable** neighbourhoods to cater for the current needs and future growth of the District **and to ensure that the housing needs of all parts of the community including specialist needs are met.**

5 6. To promote the role of the Bradford District in the Leeds City Region economy by creating conditions for housing growth, city living and enterprise where business thrives, generating opportunity, prosperity and jobs.

6. 7. To promote and support a successful growing economy with a wide range of high quality employment opportunities, by fostering indigenous firms and by attracting inward investment in the high value creative, innovative and knowledge based industries.

8. To promote, manage and develop the image and the role of Bradford City Centre as a regionally significant business, commercial, shopping, civic and cultural area.

9. To **develop our skills, training and education base through new development and** support the University of Bradford and the District's colleges and schools in investing in buildings and spaces to ensure a well-educated and skilled workforce.

10. To improve and develop excellent public transport and highway systems to increase the level of accessibility within the District and establish good connections with other parts of the Leeds City Region and the country by ensuring safety, efficiency and sustainability.

11. To ensure that Bradford is a diverse city where socially inclusive and vocal communities live and where the needs of citizens are met through improved access to good quality homes, jobs, shopping, cultural facilities, health and education provision and community facilities for a growing population.

12. To provide a clean, safe, secure, sustainable, attractive and accessible built and natural environment in order to reduce the fear of crime and disorder and foster a shared sense of civic pride and responsibility, **supporting the social, economic and physical regeneration of neighbourhoods across the District.**

13. Safeguard, enhance and promote the diverse historic built and natural heritage of the District which helps reinforce the local distinctiveness of places.

14. To **improve air quality and** reduce the impact of climate change through mitigation and adaptation, particularly through reducing **emissions pollution**, energy consumption, the risk of flooding, and promoting the use of renewable **and low carbon** energy and securing the means to become locally self-sufficient.

15. Provide accessible and varied opportunities for leisure and recreation including access to the countryside, provision of open space and the utilisation of green infrastructure spaces and routes for walking and cycling.

16. Ensure that new development provides a biodiversity net-gain and safeguards and enhances the District's biodiversity assets through careful landscape, woodland and waterways management. In particular the South Pennine Moors and upland fringe.

17. Safeguard and enhance the District's natural and renewable energy resources, including water, agriculture, woodland and minerals, and promote the sustainable management of waste and recycling.

18. To create and deliver healthy places in Bradford District that maximise health and well-being benefits for residents and visitors, provide opportunities for healthy lifestyles and reduce health inequalities.

3.5.3 The remaining sections of the chapter detail the Council's Preferred Options for strategic core policies.

3.6 Preferred Option – Strategic Core Policy SC1: Overall Approach and Key Spatial Priorities

3.6.1 With an extended end plan date there is a need to consider a minor change to the policy drafting – taking the plan through to 2037.

3.6.2 The adopted Core Strategy places a strong emphasis upon transformation and change. It is proposed to sharpen our focus and include further clarity over key growth and regeneration priorities so that there is a clear line between strategic policy and District sub area priorities.

3.6.3 Noting that the findings from the 'Special Report on Global Warming of 1.5°C', published by the Intergovernmental Panel on Climate Change in October 2018, and in line with other local authorities, the Council declared a Climate Emergency in January 2019. The Council acknowledged that 'business as usual' is not an option in the face of the climate emergency and that we may need to strategically reassess and adjust the scope of our current activities in order to make the transition to a low-carbon society.

3.6.4 There is an increasing set of evidence which demonstrates that the places where people live, learn and work are vitally important to health and wellbeing. The neighbourhoods, homes, schools, streets and workplaces that we are born, work, live and socialise in have a significant influence on many factors that affect wellbeing².

² <https://www.designcouncil.org.uk/what-we-do/built-environment/creating-healthy-places>

The Bradford District has significant public health challenges and the local plan can play a major role in helping address these complex issues.

- 3.6.5 It is proposed to update policy SC1 with further clarification on areas of growth and transformation and ensure that our response to climate change and planning for healthy places is central to our overall strategic approach and key spatial priorities.

Preferred Option: Strategic Core Policy SC1: Overall Approach and Key Spatial Priorities

A. Manage the delivery of development and change to meet the needs of the District to 2037~~0~~ in order to deliver the Spatial Vision and objectives and achieve sustainable development in line with National Planning Policy Framework and Policy P1.

B. Planning decisions as well as plans, strategies, programmes and investment decisions should seek to:

- 1. Transform economic, environmental, physical and social conditions of the District, in particular the Regional City of Bradford including Bradford City Centre, Shipley and Canal Road Corridor, key regeneration areas, including Manningham and Holme Wood, and Leeds Bradford Corridor as well as Keighley Airedale, and Shipley.**
- 2. Manage and spread the benefits of inclusive and sustainable ~~continued~~ growth of the Bradford economy as part of the Leeds City Region.**
- 3. Enhance the role of Bradford District within the wider Leeds City Region as an important business location with a good supply of labour, housing, services including retail and associated community provision.**
- 4. Optimise the opportunities provided by the close proximity of Leeds Bradford International Airport as an international business gateway for the District and the region.**
- 5. Support, protect and enhance the roles of the Principal Towns of Ilkley, Keighley and Bingley and the Local Growth Centres of Burley in Wharfedale, Menston, Queensbury, Thornton, Silsden and Steeton with Eastburn as hubs for the local economy, housing and community and social infrastructure and encourage diversification of the rural economy of the District.**
- 6. Support the Local Service Centres as defined in Policy SC4 in providing for homes and local services.**
- 7. Protect and enhance the District's environmental resources for all including areas of international and national importance, such as the South Pennine Moors, the character and qualities of the Districts heritage, landscape and**

countryside and maximise the contribution they can make to the delivery of wider economic and social objectives.

8. Ensure a move towards a resilient low carbon future **resilience** and first minimise the District's exposure to environmental threats and then mitigate ~~become adaptable to~~ environmental threats to the District through adaptation and building resilience. ~~and minimise the District's exposure to those threats.~~

9. Avoid increasing flood risk, and manage land and river catchments for flood mitigation, renewable energy generation, biodiversity enhancement and increased tree cover.

10. Ensure that transport management and investment decisions support and help deliver the spatial strategy, in particular sustainable patterns of development, inclusive access to jobs and facilities, and shift to sustainable forms of movement.

11. Ensure that developments are of high quality and well designed and that they contribute to inclusive built and natural environments which protect and enhance local settings, and heritage and reinforce or create a sense of local character, community and distinctiveness.

12. Ensure that the local plan and well-designed, high quality development contributes to the creation and delivery of healthy places, improving people's health and wellbeing and helping reduce health inequalities, by planning sustainable, well-connected places where people want to live and work.

3.7 Reasonable Alternatives - Overall Approach and Key Spatial Priorities

3.7.1 The reasonable alternatives considered:

- Update the policy but consider a less extensive range of changes – does not deliver a comprehensive strategic approach to a key overview policy.

Consultation Question 2

Preferred Option: Strategic Core Policy SC1: Overall Approach and Key Spatial Priorities

The Preferred Option makes reference to the updated plan period, a consistent approach to growth and regeneration and includes enhanced reference to climate change and healthy communities.

Q2. Please provide your comments for Policy SC1 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

3.8 Preferred Option - Strategic Core Policy SC2: Climate Change, Environmental Sustainability and Resource Uses

- 3.8.1 The NPPF (paragraph 148) makes clear that the planning system should support the transition to a low carbon future in a changing climate. In particular it should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience. More generally, the challenges of climate change and a lower carbon future also provides the opportunity to stimulate business innovation and specialisation.
- 3.8.2 The 25 Year Environment Plan establishes ten key goals to improve the environment. Goal seven looks specifically at taking all possible action to mitigate climate change, while adapting to reduce its impact. This will involve continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases.
- 3.8.3 The Planning Act 2008 introduced a new duty for local plans to address climate change. In particular it indicates that policies should be designed to secure development that contributes to the mitigation of, and adaptation to, climate change. Key challenges identified in the Act are: securing progress against the UK's emission targets, delivering the ambition of zero carbon development, and shaping sustainable communities that are resilient to climate change. The Planning Practice Guidance indicates that planning can also help increase resilience to climate change impacts through the location, mix and design of development.
- 3.8.4 New development should therefore be planned to avoid vulnerability to the impacts arising from changes in the climate. Where development needs to be brought forward in areas that are vulnerable, risks need to be managed through suitable adaptation measures so as to provide sufficient resilience.
- 3.8.5 Government has recently announced its plan to legislate for a net zero target for all greenhouse gases by 2050. This plan is stronger than the current adopted target under the Climate Change Act 2008 to reduce emissions by 80% in 2050 from 1990 levels³. The Council along with a number of other local authorities has declared a climate emergency and has set out a number of commitments to become a carbon neutral organisation by 2030 and to ensure that the District's net carbon emissions are reduced by 90% by 2030 compared to 2005 levels.
- 3.8.6 Addressing climate change is a Strategic Core Policy as it is a priority both for the Council and national government. Ensuring that the local plan responds positively to

³ <https://www.theccc.org.uk/tackling-climate-change/the-legal-landscape/the-climate-change-act/>

the challenges of climate change is a key feature of the adopted core strategy and is featured across strategic policies and thematic sections of the plan relating to energy, flood risk, biodiversity, green infrastructure, transport and environmental protection provide more detail on addressing impacts.

- 3.8.7 The preferred policy option builds upon the existing policy and takes a more holistic approach by providing a clearer link to the District's Climate Change Framework, incorporates a focus upon green infrastructure and biodiversity, strengthens policy around air pollution, and introduces policy links for electric vehicle charging and the effective use of land and buildings.

Preferred Option: Strategic Core Policy SC2: Climate Change, Environmental Sustainability and Resource Use.

Planning decisions as well as plans, strategies, investment decisions, and programmes should:

- A. Plan for a low-carbon future through the innovation, adaptation and building long-term resilience to the impacts of climate change in the ~~d~~District by:
1. Supporting the implementation of the District's Climate Change Framework and Accessing the risks designing an appropriate level of adaptation into all aspects of regeneration projects, new development and improvements to infrastructure.
 2. Working with partner organisations and local communities to appraise, reduce, design and manage all sources of flooding.
 3. Facilitating the management, enhancement and expansion, where appropriate, of vulnerable habitat types; primarily blanket bog and woodland and supporting action plans for habitats and species at risk.
 4. Working with developers and partner organisations to ensure that, where appropriate Green Infrastructure is incorporated into all regeneration projects, improvements to infrastructure and new development.
 5. Addressing the opportunities and pressures that an increasing population has on the ~~d~~District's land resource, particularly in key locations for tourism and recreation.
 6. Working with partner organisations to address fuel poverty and to stimulate ~~the local energy~~ all sectors s to deliver carbon reduction ~~saving~~ measures.

7. ~~Aiming to improve air quality overall, to integrate road transport emission reduction into decision making and to address the impact of climate change on buildings, public spaces and vulnerable groups.~~ Reduce emissions and improve air quality by working with partners to make walking, cycling and the use of public transport a first choice for all, as well as ensuring that road transport emissions reductions are integrated into decision making. Requiring new development to be located and / or positioned in sustainable well-connected locations in a way that minimises emissions as well as limits its occupants' exposure to poor air quality.
8. Supporting the roll out of appropriate electric vehicle charging points across the District to promote the uptake of electric vehicle use.
9. Working with the ~~d~~Districts businesses to maximise opportunities from the move to a low-carbon economy, to raise awareness of increasing future costs of energy and water and to minimise potential disruption to local infrastructure.
- B. We will seek to mitigate against the impact of climate change and Ssupport meeting the Council's carbon reduction targets as set out in the Climate Change Framework by:
 1. Maximising energy efficiency, use of sustainable transport and other forms of infrastructure by focusing development and activity in the Regional City of Bradford followed by the Principal Towns of Keighley, Bingley and Ilkley.
 2. Locating development where it will support opportunities for the delivery of renewable and low carbon energy, green infrastructure and improvements to public transport and facilities for walking and cycling.
 3. Meeting the local challenges of moving towards low carbon living by engaging with residents and businesses to create sustainable and resilient communities. ~~, particularly in Local Growth Centres.~~
- C. Seek to assess and manage the impact of future decisions on the District's natural resources.
- D. Require new development to use resources sustainably and reduce their environmental impact in particular by:
 1. Utilising ~~ation~~ ~~of~~ natural light and solar energy.
 2. Achieving high standards of energy efficiency.
 3. Taking the opportunities to produce and or access renewable energy.
 4. Minimising water consumption and maximising the use of water recycling and sustainable ~~urban~~ drainage systems (SuDS).
 5. Making the most effective use of land, through the conversion of existing buildings and reuse of previously developed land.
 6. Ensuring new development is located in sustainable locations, helping reduce travel-related emissions and close to local amenities and services.

3.9 Reasonable Alternatives – Climate Change

3.9.1 The reasonable alternatives to the Preferred Option which were considered and discounted are noted below:

- Do not review the policy and the policy remains unchanged from the adopted core strategy – the policy could be considered less strategic in scope.
- Developing within the policy a more defined and aspirational carbon reduction target (for example carbon neutral) – the policy makes reference to the District’s Climate Change Framework and would align with the targets set in the framework and the Council’s Climate Emergency declaration.
- Adopting a more succinct policy with technical detail referenced to a new Supplementary Planning Document (SPD) – risk that the policy would provide insufficient detail and the SPD may lack a useful planning policy framework.

Consultation Question 3

Preferred Option: Strategic Core Policy SC2: Climate Change and Resource Use

This policy sets out the strategic approach for tackling climate change. In particular it looks at how we should be planning for the adaptation and long-term resilience to the impacts of climate change as well as how we can mitigate against the impacts.

The preferred option for the updated policy includes new references to Green Infrastructure (identifying its importance in helping to adapt to climate change) and air quality (seeking to improve air quality through reduced emissions by improving public transport and active travel options). This will further help to ensure that Bradford continues to transition towards a low-carbon economy and society whilst enhancing the resilience to the potential impact of climate change.

Q3. Please provide your comments for Policy SC2 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

Strategic Core Policy SC3: Working Together – NOT UNDER REVIEW

Strategic Core Policy SC4: Hierarchy of Settlements – NOT UNDER REVIEW

3.10 Preferred Option - Strategic Core Policy SC5: Location of Development

- 3.10.1 Policy SC5 is supported by a number of thematic policies on housing and economy to provide a clear framework and sequential approach within the local plan to the supply of development sites. It places a strong priority upon the use of deliverable previously developed land and the use of existing urban areas.
- 3.10.2 The adopted Core Strategy policy placed an emphasis upon prioritising between 'local Green Belt' and larger urban extensions. The policy has been redrafted to focus upon limited Green Belt release without specific reference to the potential scale of the Green Belt release site. All Green Belt release options will need to contribute towards delivering sustainable development. Updated Policy HO4 indicates specific phasing requirements, which do not necessarily relate to whether the Green Belt release site is considered of local or of a larger more strategic scale.
- 3.10.3 The other changes in the policy relate to a separation and reordering within the movement hierarchy to further emphasise the importance of active travel and clarification on the definition of the road hierarchy, in line with updated transport policies.

Preferred Option: Strategic Core Policy SC5: Location of Development

A. In accordance with the rest of the Strategic Core Policies, and with Policies HO2, HO3, HO4, HO6, HO7 and EC3, and after determining the broad distribution of development between the District's settlements, the Council will allocate sites in the Allocations DPD and Area Action Plan DPDs by giving:

- 1. First priority to the efficient and effective re-use of deliverable and developable previously developed land and buildings provided that it is not of high environmental value and ~~the~~ more efficient and effective use of existing developed areas within the City of Bradford, the Principal Towns of Ilkley, Keighley and Bingley, the Local Growth Centres and the Local Service Centres.**
- 2. Second priority to ~~other~~ sustainable Greenfield opportunities within the settlements.**

3. Third priority to the limited release of Green Belt land as set out under Strategic Core Policy 7. Local Green Belt releases to the built up areas of settlements in sustainable locations.

~~**2. Fourth priority to larger urban extensions in sustainable locations**~~

Subject to above:

B. In identifying and comparing sites for development, the Local Plan will adopt an accessibility orientated approach to ensure that development:

1. Makes the best use of existing transport infrastructure and capacity to enhance the quality and efficiency of public transport and to enhance and provide routes for walking and cycling.

2. Maximises accessibility by walking, cycling and creating green corridors.

3. Supports the use of public transport and meets minimum accessibility standards as set out in Appendix 2.

4. Takes into account capacity constraints and deliverable improvements, particularly in relation to improving and development of the Strategic Road Network including junctions and schemes identified in the Spatial Vision.

~~**3. Meets or can be mitigated in order to meet the public transport accessibility criteria set out in Appendix 3 and maximises accessibility by walking and cycling.**~~

5.4. Maximises the use of rail and water for uses generating large freight movements.

3.11 Reasonable Alternatives - Location of Development

3.11.1 The reasonable alternatives considered and discounted for this policy include:

- Do not review policy – policy remains unchanged from the adopted core strategy policy – on review it was considered that there was no clear rationale for applying a prioritisation to local Green Belt release ahead of larger urban extensions; the reordered movement hierarchy reflects changes made to other policy areas to reinforce the carbon reduction and air quality improvement priorities. Changes to the road hierarchy are in line with other updated policies.
- Undertake more limited changes to the policy and retain current Green Belt prioritisation - this may limit the opportunities for larger urban extensions to deliver ahead of smaller 'local' Green Belt development opportunities.

- Undertake more limited changes to the policy and delete the Green Belt prioritisation element but retain movement and road hierarchy as drafted in adopted core strategy policy – does not align fully with updated transport and other policies, focused upon carbon reduction and air quality improvements.
- Variations on limited changes.

Consultation Question 4

Preferred Option: Strategic Core Policy SC5: Location of Development

The preferred policy now primarily includes changes to Green Belt site prioritisation and a reordered movement hierarchy.

Q4. Please provide your comments for Policy SC5 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

3.12 Preferred Option - Strategic Core Policy SC6: Green Infrastructure

- 3.12.1 Green Infrastructure (GI) is a network of multifunctional green space and includes a number of environmental assets such as parks, playing fields, woodlands, street trees, allotments and private gardens.
- 3.12.2 The NPPF (paragraph 171) indicates that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. It also identifies (paragraphs 91, 150) that GI can be used to help to adapt to climate change; improve air quality; and promote healthy lifestyles.
- 3.12.3 The NPPG and 25 Year Environment Plan recognise that GI provides multiple benefits and can help to deliver wider planning policy objectives. In particular, high quality networks of multifunctional GI provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity. GI also provides opportunities for recreation, relaxation and exercise thereby helping to deliver physical and mental health benefits. It can provide improved accessibility to the countryside and green space for people who live within the main built up areas. GI can contribute to creating high quality environments which can attract businesses thereby driving economic growth and regeneration.

- 3.12.4 Within new housing developments GI can provide areas for social interaction, leisure and play opportunities. This support healthy lifestyles and contributes to creating a sense of place. Local Green Infrastructure can provide an invaluable opportunity for everyday 'doorstep' play for younger children and multi-generational space if designed effectively. Introducing small-scale food growing, trees and water bodies into urban areas can enhance local interest, visual amenity as well as moderate the urban heat island effect and help wildlife to adapt to climate change. GI can also provide sustainable transport links and areas where communities can grow food which can help to reduce wider environmental impacts.
- 3.12.5 Bradford's approach to GI needs to reflect the value that GI can add to the quality of the District for residents, visitors and businesses, the need to adapt to climate change and the importance of existing environmental assets, particularly the District's rural hinterland. Identifying GI assets can improve and protect essential natural capital; including soils, air quality and critical water resources. Benefits and services include the provision of food, fibre and fuel, the regulation of climate, the purification of air and water and flood protection. GI can also contribute to enhancing the setting of cultural heritage assets through appropriate planting and management of existing landscape features. GI supports the wellbeing, including the mental wellbeing of residents, and is especially important to the resilience and development of children and young people. Implementing GI needs to deliver landscape or public realm creation, enhancement or restoration.
- 3.12.6 The aspiration to create space for both green and blue (i.e. water-based) infrastructure within the city centre, the Canal Road Corridor and elsewhere within the densely developed urban area will form an essential element in the District's approach. Creating space for water can help to manage flood risk, improve water quality and access to waterways, support regeneration, provide wetland habitats and landscape enhancement and create new leisure opportunities. The Strategic Flood Risk Assessment (SFRA) indicates that a key function of GI is to provide additional water storage in areas of greatest flood risk. It recommends restoring the natural character of floodplains, preserving areas of existing natural floodplain and introducing new areas of green space which incorporate sustainable drainage systems. Undeveloped land within the urban area, upstream of locations where surface water flooding is a problem, should be considered for inclusion in future areas of GI.
- 3.12.7 GI is included as a Strategic Core policy as it provides a common thread that links other important issues in the Core Strategy including: local resilience to climate change (in relation to the provision of flood water storage, sustainable drainage and urban cooling), sustainable transport and housing, leisure and tourism, health and well-being and making space for water. Particular aspects of GI have been developed in the environment theme policies relating to biodiversity, recreation and open space, heritage, design and landscape. Providing high quality areas of natural greenspace on a suitable scale will assist in mitigating the adverse effects of increased recreation on the South Pennine Moors SPA/SAC.

- 3.12.8 The existing Core Strategy policy has been updated to provide clearer direction to new development in contributing towards linking areas and corridors of Green Infrastructure. The policy also now provides for further strategic information on Green Infrastructure to be identified within the Allocations DPD and detailed on the Key Diagram and Sub-Area Diagrams, which will be subject to further revisions.

Preferred Option: Strategic Core Policy SC6: Green Infrastructure

- A. Planning decisions as well as Plans, policies, strategies and investment decisions will support and encourage the maintenance, enhancement and extension of networks of multi-functional spaces, routes and key areas of Green Infrastructure, as an integral part of the urban fabric and to improve urban and rural connectivity. Where gaps exist in the existing Green Infrastructure network, new development should identify opportunities to link areas together, to create Green Infrastructure corridors and spaces for leisure and play.

Working with partners, support will be given to projects and programmes that incorporate Green Infrastructure and take account of the following: ~~The sub-regional drivers of:~~

- Promoting quality of place and a successful economy;
- Achieving greater resilience to climate change;
- Encouraging healthy and wellbeing living and sustainable transport; and
- Reversing biodiversity decline.

~~Are supported as a basis for programmes of joint investment with partner organisations.~~

- B. The River Corridors of the Aire and Wharfe, and the South Pennine Moors are identified as strategic Green Infrastructure assets and will be protected ~~due to for~~ the opportunities they offered to enhance the living landscape as a resource for people and wildlife and to address future needs for flood alleviation, water management, carbon capture, and recreation. ~~Mitigating the adverse effects of increased recreation upon the South Pennine Moors SPA/SAC will be a priority.~~

- C. Green spaces and corridors which make a significant contribution to the Green Infrastructure network will be protected. At a district level, Green Infrastructure is ~~considered to be~~ land which already contributes, ~~towards~~ or has the potential to contribute, towards ~~the following:~~

1. Retention, creation and enhancement of important habitats and ecological networks;
2. Resilience to climate change and sustainable design;

3. Important attributes of natural greenspace, connectivity to other greenspaces and a local need for open space;
4. Valued landscapes and local distinctiveness and amenity, particularly within the urban core;
5. Historic parks and landscapes and the setting for heritage assets;
6. Improving opportunities for walking, cycling and horse riding, establishing strategic green links and enhancing the rights of way network in urban and rural parts of the district.
7. The provision of community gardens, green spaces for multi-generational play and leisure and small scale food growing opportunities.

~~Green spaces and corridors which can be assessed as making a significant contribution towards the above criteria will be protected. Further work to define Green Infrastructure will be carried out through the preparation of other Local Plan documents.~~

The strategic Green Infrastructure networks for the District will be defined in the Allocations DPD and shown on the Policies Map.

The Allocations DPD will identify locations for development, ~~will be identified~~ that offer opportunities to provide and/or enhance Green Infrastructure **and principle for design will be set out to deliver this.**

3.13 Reasonable Alternatives

3.13.1 The reasonable alternatives to the Preferred Option considered and discounted are detailed below:

- Do not review policy – policy remains unchanged from the adopted core strategy policy – it was unclear how the policy would directly inform developments and fill gaps within the existing GI network.
- Policy includes a detailed map of GI in Bradford with targeted areas for improvement – work on defining GI detail will be included within both the Allocations DPD and a further iteration of the Key Diagram and Sub Area Diagrams, rather than a high level policy only for which further detailed explanation may be required through the Allocations DPD.
- Policy drafting is reduced to a more succinct format and supported by an SPD on GI – need for effective policies within the Local Plan – risk that the policy would provide insufficient detail and the SPD may lack a useful planning policy framework.

Consultation Question 5

Preferred Option: Strategic Core Policy SC6: Green Infrastructure

This policy sets out the strategic approach to protecting the District's key Green Infrastructure assets.

The Preferred Option updates this policy to include a requirement for new development to identify opportunities to link together areas of Green Infrastructure, particularly where gaps exist in the network. It also strengthens the policy approach to protecting Green Infrastructure network.

Q5. Please provide your comments for Policy SC6 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

3.14 Preferred Option - Strategic Core Policy SC7: Green Belt and Safeguarded Land

Overview

- 3.14.1 The Government attaches great importance to Green Belts with the general extent of Green Belts across the country already established. The Bradford District Green Belt was first established in 1966 and in general continues to achieve the fundamental aim set out in the NPPF of preventing urban sprawl and keeping land permanently open. The Green Belt accounts for 23,886ha of land, approximately 65% of the District's land area.
- 3.14.2 The NPPF is clear that boundaries defined in adopted local plans or earlier approved development plans should be altered only where exceptional circumstances are fully evidenced and through preparation or review of the local plan. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for change to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.
- 3.14.3 In accordance with paragraph 137 of the NPPF, before concluding that exceptional circumstances exist, the local planning authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, and whether the plan:

- makes as much use as possible of suitable brownfield sites and underutilised land;
- optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

3.14.4 When defining Green Belt boundaries, plans should where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period (para. 139 c)).

Meeting Housing Need and Optimising Brownfield Potential

3.14.5 Revised Policy HO1 details a need to allocate land for at least 26,150 dwellings over the plan period 2020-37. The Council has carried out detailed analysis of the current land supply picture and the extent of supply which can be considered to be genuinely both suitable and either deliverable and developable within the plan period. It has taken account of all currently known residential land supply options and information relating to major site constraints and market conditions. From this work it is clear that suitable brownfield and other non-Green Belt sites can make a significant contribution towards meeting the housing need – estimated to be in the region of 21,275 dwellings across the District or approximately 81.36% of the total minimum need. This assessment takes into consideration a significant uplift beyond minimum density standards as set out within Policy HO5 of the adopted plan in urban areas and locations well served by public transport, where this would not have unacceptable adverse consequences. Beyond this portfolio of brownfield sites, there is still a need to find residential land for approximately 4,874 dwellings within the plan period.

3.14.6 The land supply shortfall indicated above is based on the Preferred Option for Policy HO3 which maximizes the use of deliverable and developable non green belt land and takes a sustainable approach to housing distribution reflecting the settlement hierarchy, regeneration priorities, where housing need is most acute and a range of environmental constraints. That preferred option distributes 70% of the district housing requirement to the Regional City a slight uplift on that within the adopted plan and a further 16% to the Principal Towns

3.14.7 An ambitious but achievable view of what can be delivered within the urban areas in non-green belt locations has been taken which will require focused intervention in some instances. The Council also has strong ambitions for the continued renaissance of Bradford city centre through the emerging City Centre Masterplan, Townscape Heritage Initiative, major transport investment projects plus a focus upon maximising opportunities within the District's key regeneration areas to ensure that there is a coordinated approach to transformation in many of the District's more deprived neighbourhoods.

- 3.14.8 At the strategy level, the Core Strategy is supported by an emerging Housing Delivery Test Action Plan (HDTAP) and corporate Housing Strategy – both focused upon further housing growth within the District and the challenges of delivering brownfield redevelopment. Unlocking the regeneration potential of the City and its diverse neighbourhoods including enhancing the public realm and urban green infrastructure is a key challenge and priority for the Council.
- 3.14.9 In accordance with national planning policy para 137, discussions have taken place through Duty to Co-operate with neighbouring authorities in order to understand whether they could accommodate any of Bradford’s identified remaining housing need before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries. These discussions have concluded that none of Bradford’s local authority neighbours are in a position to make a contribution towards meeting the District’s remaining housing need.

Employment Land

- 3.14.10 The updated economic evidence and Policy EC2 identifies a need to allocate a minimum of 60 hectares of deliverable employment land across the plan period to meet identified forecast need. The policy further splits this into 40ha within the Regional City of Bradford, 15ha within Airedale and 5ha within Wharfedale. The Employment Needs Assessment and Land Review (ENALR) 2019, identifies particular initial gaps in the provision of:
- high / best quality employment land;
 - larger quality sites to facilitate local business movement towards the upper tiers of the current employment land portfolio, and
 - sites to support the development of high growth sectors and low carbon economy orientated businesses.
- 3.14.11 The geographical market analysis from the ENALR would indicate particular demand for employment land which is broadly aligned to the adopted Core Strategy ‘areas of search’ in EC3 but have been updated to reflected the latest intelligence. Areas of search for employment land are therefore:
- North / North East of the Regional City of Bradford,
 - South East Bradford, and
 - Airedale Corridor
 - Wharfedale Corridor

These areas reflect the outputs from the ENALR based upon supply and demand analysis and the most sustainable areas for employment growth in sectors detailed within the Economy Chapter.

- 3.14.12 Part 2 of the ENALR has been commissioned by the Council which will provide a detailed analysis of employment site options to feed into the Allocations DPD and any further policy development for the Core Strategy Partial Review. This detailed work will help inform the extent of current employment sites to be carried forward

through the local plan and particular gaps in the portfolio of sites by size, quality and location as well as any key deliverability considerations.

- 3.14.13 As part of this gap analysis the Council will be undertaking a focused 'call for employment sites' focusing upon the broad area of search locations identified above and on the Draft Key Diagram. This will ensure that the Council has fully explored all employment site options and that there are sufficient sites to be assessed to meet the 60ha employment land requirement. The Council will also be reviewing its Housing and Employment Land Availability Assessment (HELAA) database for sites which have potential for uses other than housing. With the focus nationally on delivering housing and subsequent increase in land values, employment sites have often been 'squeezed' from the land supply with the vast majority of the Council's land availability database consisting of sites put forward for residential use. The Council is currently developing proposals to attract investment into District and address viability gaps through the Business Development Zones and Enterprise Zones initiatives, and a comprehensive portfolio of transport improvement schemes. The Council will also utilise evidence from this and other sources to reveal any potential for additional supply including from intensification of uses within existing employment areas or the reconfiguration of uses.
- 3.14.14 In addition to employment and housing uses the Council will be developing its proposals for supporting uses and infrastructure. The Council will also be exploring whether there is potential for the employment needs to be met beyond the beyond the District's boundary.
- 3.14.15 Paragraph 137 of the NPPF doesn't differentiate between land uses in terms of demonstrating that all reasonable options have to be examined before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries. The Council is therefore still to conclude on this issue, with the final position will be informed by the ENALR, focused calls for sites, HELAA review and Duty to Cooperate discussions.

Exceptional Circumstances

- 3.14.16 In order to meet its housing needs in full and with all reasonable alternatives having been explored, the Council considers that exceptional circumstances exist which justify and require a change to the general extent of the Green Belt through the Allocations DPD. The updated evidence and Policy HO1 indicate that there is a need to change the Green Belt boundary to accommodate circa 4,876 dwellings within the plan period; this can be contrasted with 11,000 dwellings in the adopted Core Strategy.
- 3.14.17 Updated Policy HO3 (Housing Distribution) provides details of the Council's preferred distribution of housing growth which takes into consideration opportunities to maximise brownfield development plus the accommodation of circa 4,876 dwellings through changes to the Green Belt. The Sub Area policies also indicate the settlement locations for Green Belt release. In addition to a significant reduction in the overall scale of Green Belt change proposed the Council's preferred options have reduced the number of areas where such change is proposed from 23 out of

the 27 settlements and sub areas in the adopted plan to 12 in this document. Green Belt releases in individual settlements will increase housing choice and support the vitality and viability of local services.

3.14.18 Before reaching the decision to include proposals to change and release land from the Green Belt and the nature and form of those changes, the Council has also had regard to paragraphs 138 and 11 of the NPPF and the policy tests within them.

3.14.19 NPPF paragraph 11 indicates that plans should positively seek opportunities to meet the development needs of their areas. Strategic policies should, as a minimum, provide for the objectively assessed needs for housing and other uses unless one of two circumstances exist. The Council has examined both instances where it may not be appropriate to pursue a strategy which does not meet in full its development needs and concluded that neither applies at this time:

a) NPPF paragraph 11bi) indicates that councils should consider whether the application of policies which protect areas of assets of particular importance – with Green Belt being one – would provide a strong reason for restricting the overall scale, type and distribution of development. The Council has considered a range of evidence including the Bradford Growth Assessment (which established that there were opportunities to deliver Green Belt change in a sustainable way which did not undermine the local and strategic functioning of the Green Belt), the Habitats Regulations Assessment and the Sustainability Appraisal, and concluded that there are no such reasons to plan for less than those minimum housing needs.

b) NPPF paragraph 11bii) indicates that Council's should consider whether there would be any adverse impacts of meeting the district minimum needs which would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. Again the Council consider that there is no such case for meeting less than its full minimum housing needs. Indeed it concludes that there could be significant adverse impacts of not doing so relating to reduced housing choice, increased overcrowding and poor living conditions and in terms of undermining regeneration.

3.14.20 NPPF paragraph 138 indicates that when reviewing Green Belt boundaries the need to promote sustainable patterns of development should be taken into account. The Council has duly considered the consequences for sustainable development of channelling development towards urban areas inside the settlement boundary and maximized such opportunities in its proposed distribution of housing and employment land. However it has also had regard to the need to protect and where appropriate enhance the important network of open spaces within them which are crucial to a range of wider goals, to place making and supporting the health and well-being of the district's residents. The Council has examined but does not consider that there are any significant and sustainable opportunities for development within villages inset within the green belt. In all such cases these settlements are excluded from the settlement hierarchy and are not considered suitable for development other than limited infill. Should such infill opportunities arise they would assist in delivering the assumed windfall contribution set out in Policy HO2.

- 3.14.21 The Council is continuing to support the development of a Sustainable Urban Extension (SUE) at Holme Wood, which is developed further through Sub Area policy BD1. The SUE has opportunities to make a significant contribution to meeting the overall housing need for the District and to support regeneration opportunities within the existing nearby Holme Wood Estate as well as providing a range of other uses including employment, and an enhanced range of local facilities and services. There is also the opportunity to unlock major strategic infrastructure investment to improve cycling, walking and public transport options and address existing vehicle congestion in South Bradford.
- 3.14.22 The Holme Wood SUE is a unique opportunity for place-making and sustainable growth but it is also a long-term project. It is estimated that this site will deliver circa 1,290 dwellings within the plan period, which equates to about 25% of the identified housing need to be delivered by changing Green Belt boundaries. The remaining growth – possibly in the region of 1,500 dwellings – is forecast to be delivered beyond the plan period.
- 3.14.23 Further work is to be concluded whether exceptional circumstances exist to justify changes to Green Belt boundaries for employment land in this location.

Selective Green Belt Review

- 3.14.24 A selective review of the Green Belt is ongoing to evaluate the performance of Green Belt parcels against its purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Draft methodology for this review is published alongside the evidence base to support the CSPR.

- 3.14.25 While it is not considered that the scale of Green Belt boundary changes and locations identified under HO3 and sub area policies will prejudice the strategic function of Green Belt, further work will be undertaken to consider the individual impact of site options on the purpose of the Green Belt, before the site allocations are finalised.

Safeguarded Land

- 3.14.26 As outlined above the NPPF indicates that Green Belt boundaries should be established that can ensure beyond the plan period. Identifying safeguarded land – land which is excluded from the Green Belt and which is protected and held in reserve in case it is needed for development beyond the current plan period – is one tool for ensuring the longevity of Green Belt boundaries. However the NPPF

does not insist on the identification of safeguarded land and since any new such designations would need to be additional releases from the current Green Belt the Council needs to give very careful consideration whether it is essential for such releases to be made at this time. In considering the issue the Council has had regard to the fact that almost all of the safeguarded land established within the RUDP has now either been developed or is assumed to be contributing to the Council's housing and employment needs as detailed in Policies HO1 and EC3. However it also acknowledges that the need for safeguarded land releases in the near future is potentially lessened by the fact that the Council is establishing allocations to meet need over a full period of 15 years from adoption (rather than the minimum NPPF requirement of making specific allocations for just the first 5-10 years). Thus with the Council adopting a substantially longer plan period (up from 2030 to 2037) it is already technically 'safeguarding' the Green Belt over the longer term. It is also recognised that the Home Wood SUE is likely to be delivering growth well beyond the end date of the plan.

- 3.14.26 In light of these issues and with regard to the recent changing dynamics in planning towards garden villages / towns and large-scale settlements together with the potential need over the longer term for sub-regional / regional Green Belt reviews to inform strategic planning, the Council considers that only a limited quantum of safeguarded land is required to bolster long-term development needs.
- 3.14.27 The Allocations DPD will identify limited areas of safeguarded land to meet the long-term development needs of the District and ensure that the Green Belt boundary lasts beyond the plan period. Taking the total housing need for the plan period of 28,951 and applying a 10% variable for safeguarding land would equate to planning for circa 2,895 dwellings beyond the plan period.
- 3.14.28 Attention will also be paid to whether there is a need to safeguard land for employment uses subject to the outcome of the ENALR.

Enhancing Green Belt

- 3.14.29 It is considered that the allocations within the Green Belt and safeguarding land options are likely to reduce the level of Green Belt within the District by a very limited overall quantum. With a positive long term plan in place to support growth through the limited release of Green Belt land there are clear opportunities for the Council to plan positively to enhance the redefined Green Belt in terms of improving damaged land, access, leisure, visual amenity, landscape and bio-diversity and support appropriate levels of green and other infrastructure within the proposed allocated sites. Green infrastructure is discussed in detail through Strategic Policy SC6.

Policy Updates

- 3.14.30 The policy has been updated to provide clearer strategic direction on Green Belt release priorities and links through to supporting thematic and sub area policies. A new section has also been added on safeguarded land. There may be further changes to this policy following the conclusion of the employment land analysis.

Strategic Core Policy SC7: Green Belt and Safeguarded Land

Green Belt

- A. The Green Belt in the District (~~B~~road extent shown on the Key Diagram) has a valuable role in supporting urban **renaissance regeneration** and transformation, keeping settlements separate, concentrating development, and conserving the countryside.
- B. Exceptional circumstances require Green Belt releases in order to deliver, in full, the **longer term** housing **and jobs** growth in the District as set out in Policy HO3. ~~and Policy EC3.~~
- C. Policy HO3 and the Sub Area Policies provide the strategic policy direction on key changes to the Green Belt that are necessary to accommodate housing growth.
- D. The Allocations DPD will set out detailed changes to the Green Belt boundary to accommodate housing growth.

~~B These changes will be delivered by a selective review of Green Belt boundaries in locations that would not undermine the strategic function of Green Belt within the Leeds City Region and that would accord with the Core policies and the strategic patterns of development set out in Policies SC5 and SC4. The Decisions on allocations on Green Belt land will be assessed against the purposes of including land in Green Belt as set out in national guidance. The selective review will be undertaken through the Allocations DPD in consultation with local communities and stakeholders.~~

Safeguarded Land

E. The allocations DPD will identify areas of safeguarded land on the Policies Map to meet longer term development needs for housing. Development within such areas will be restricted to that which is necessary for the operation of existing uses, or appropriate alternative uses, together with such temporary uses that would protect the open nature of the land and will not prejudice the long-term development. Permanent development on safeguarded land shall only be considered through the process of preparing and updating the CBMDC Local Plan.

~~C. The revised Green Belt boundary will provide long term protection for at least 15-20 years from adoption of the Core strategy~~

3.15 Reasonable Alternatives - Strategic Core Policy 7

3.15.1 The reasonable alternatives identified are:

Reasonable Alternative 1 – Set out further detail on the land to be removed from the Green Belt and inset settlements – rejected at this stage as detailed work still to progress on the Green Belt Selective Review and site options.

Reasonable Alternative 2 – Exclude safeguarding land – may provide less certainty regarding longer-term development needs.

Reasonable Alternative 3 – Reduce the level of safeguarded land required by discounting Holme Wood SUE post plan delivery – due to the long delivery timeline for the SUE there will be uncertainty over the exact build out rates within and outside the plan period at this early stage of plan-making, making the discounting variable potentially unreliable, until further evidence is available.

Consultation Question 6

Preferred Option: Strategic Core Policy SC7: Green Belt

The policy has been updated to provide clearer strategic policy direction on Green Belt release priorities and links through to supporting thematic and sub area policies. A new section has also been added on safeguarded land.

Q6. Please provide your comments for Policy SC7 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

3.16 Preferred Option - Strategic Core Policy SC8: Protecting the South Pennine Moors and their Zone of Influence

3.16.1 The Habitat Regulations Assessment is an integral part of preparing the Local Plan and is necessary to ensure that the policies and proposals in the plan do not lead to adverse effects on the integrity of any European site through their impacts on any species, species assemblage and/or habitat for which the European site is designated.

3.16.2 The NPPF (para 177) recognises the importance of the Habitat Regulations Assessment stating that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

- 3.16.3 The HRA of the Core Strategy assessed the potential impact of the policies and proposals in the plan on the European sites of the North and South Pennine Moors SPA and SAC. It identified a number of impact pathways which are likely to significantly affect the European sites. These include:
- Loss of supporting habitats (directly or indirectly)
 - Increases in emissions / air pollution
 - Collision mortality risk and/or displacement of bird species due to wind turbine developments
 - Recreational impacts including walkers, dogs, trampling and erosion
 - Urban edge effects
- 3.16.4 Due to the proposed distribution of development the magnitude of the impacts varies between the different European sites. The HRA indicates that if left unmitigated, the potential impacts are likely to be greater in relation to the South Pennine Moors due to their relative proximity and accessibility to the proposed areas for development.
- 3.16.5 The HRA identified a number of zones of influence on which the policy approach is based, along with the identification of avoidance and mitigation measures. The purpose of the policy is to avoid potential adverse impacts on the South Pennine Moors SPA and SAC, yet allow development to take place in locations and on a scale where potential impacts are at such a level that there is confidence that avoidance and mitigation measures can be effective.
- 3.16.6 In Zone A (areas within 400m of the SPA/SAC boundary) the HRA recommends that residential development should be restricted in order to avoid the risk of urban edge effects. This is because it is generally not possible to be reasonably certain that such adverse effects can be avoided or alleviated at this distance.
- 3.16.7 In Zone B (areas that are 2.5km from the SPA/SAC boundary) the evidence indicates that this is where SPA qualifying bird species travel to forage. Within this zone consideration needs to be given as to whether land proposed for development affects the foraging habitat of the qualifying bird species. New survey work has been carried out to assess a number of potential development sites within the 2.5km zone and determine whether they provide foraging habitat. This information will be used as part of the site assessment work for the Allocations DPD and to ensure that those areas regularly used by the protected species can be appropriately protected from development and its associated impacts.
- 3.16.8 Zone C (areas up to 7km from the boundary of the SPA/SAC) is a zone of visitor influence based on the findings of visitor survey data. It used postcode of origin and point of access to the SAC/SPA data to determine how far people travelled to visit the sites for recreational purposes. A new visitor survey has been carried out to further assess how the moors are used for recreation. The information from this survey will be used to determine the most appropriate mitigation and management measures to address the impacts of recreational use of the moor.

- 3.16.9 Other impact pathways, such as increases in emissions/air pollution, will be addressed as part of the detailed testing and traffic modelling being carried out to inform the Allocations DPD.
- 3.16.10 Policy SC8 will be supported by a Supplementary Planning Document (SPD) which will identify opportunities for the provision of alternative natural greenspace and improvements to existing areas, along with visitor access and management measures. It will also set out a mechanism for the calculation of planning contributions to be obtained from new developments in order to provide relevant management and mitigation measures.
- 3.15.11 Habitat Regulations Assessment is an iterative process and additional assessment will be carried out as further progress is made on the preparation of the Core Strategy. The evidence informing the HRA is currently under review and therefore it is possible that Policy SC8 will see further amendments, particularly in terms of the 400m buffer (Zone A) and its application in existing urban areas adjacent to the SPA/SAC. Some minor changes have been made to Policy SC8 to improve the clarity of the policy.

Strategic Core Policy (SC8): Protecting the South Pennine Moors SPA and the South Pennine Moors SAC and their zone of influence

In this Policy:

- **Zone A is land up to 400m from the South Pennine Moors Special Protection Area (“SPA”) and South Pennine Moors Special Area of Conservation (“SAC”) boundary;**
- **Zone B is land up to 2.5km from the SPA and SAC boundary; and.**
- **Zone C is land up to 7km from the SPA and SAC boundary.**

Subject to the derogation tests of Article 6(4) of the Habitats Directive, in all Zones development will not be permitted where it would be likely to lead, directly or indirectly, to an adverse effect (either alone or in combination with other plans or projects), which cannot be effectively mitigated, upon the integrity of the SPA or the SAC.

In conducting the above assessment the following approach will apply:

In Zone A no development involving a net increase in dwellings would be permitted unless, as an exception, the development and/or its use would not have an adverse effect upon the integrity of the SPA or SAC.

In Zone B it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat for qualifying species of the SPA.

In Zone C, in respect of residential developments that result in a net increase of one or more dwellings, it will be considered how recreational pressure on the

SPA or SAC, that such development might cause, will be effectively mitigated. The mitigation may be:

(i) ~~such that the developer elects to offer, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace and/or other appropriate measures; or that the developer delivers a form of accessible natural greenspace, either on-site or adjacent to the site; and/or other appropriate measures; OR~~

(ii) in the form of a financial contribution from the developer to enable:

1. The provision of additional natural greenspace and appropriate facilities to deflect pressure from moorland habitats and the long-term maintenance and management of that greenspace.
2. The implementation of access management measures, which may include further provision of wardens, in order to reduce the impact of visitors on the moorland.
3. A programme of habitat management and manipulation and subsequent monitoring and review of measures.

To mitigate impacts on the SPA and SAC due to the increase in population, an SPD will set out a mechanism for the calculation of the financial contributions, by reference to development types, the level of predicted recreational impact on the SPA or SAC, and the measures upon which such contributions will be spent.

3.17 Reasonable Alternatives – Protecting the South Pennine Moors and their Zone of Influence

3.17.1 The reasonable alternatives to the Preferred Option considered and discounted are detailed below:

- Minor text changes to policy for clarification. The on-going HRA of the plan will review the policy, particularly the 400m buffer (Zone A) and its application in existing urban areas adjacent to the SPA/SAC. This may result in a policy amendment in the forthcoming publication draft of the CSPR.

Consultation Question 7

Preferred Option: Strategic Core Policy SC8: Protecting the South Pennine Moors and their Zone of Influence

The purpose of this policy is to avoid any potential adverse impacts on the South Pennine Moors SPA and SAC, yet allow development to take place in locations and

on a scale where potential impacts are at such a level that there is confidence that avoidance and mitigation measure can be effective.

Q7. Please provide your comments for Policy SC8 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

Strategic Core Policy SC9: Making Great Places – NOT UNDER REVIEW

3.18 Preferred Option - Strategic Core Policy SC10: Creating Healthy Places

- 3.18.1 An increasing evidence base shows that the places where people live, learn, play and work are vitally important to health and wellbeing. The neighbourhoods, homes, schools, streets and workplaces that we are born, work, live and socialise in have a significant influence on many factors that affect wellbeing.
- 3.18.2 These factors include access to leisure facilities and green space, levels of traffic, infrastructure for public transport, walking and cycling, access to good quality housing which is influenced by housing supply, location, quality, type and design as well as skills, jobs and wage levels. Healthy places are increasingly recognised as places where people want to live and work and as adding economic value and contributing to economic recovery.
- 3.18.3 The way that places develop over time - where roads are built, the age and quality of housing and access to green space shapes our exposure to both positive and negative factors for health and wellbeing. Negative factors include poor air quality, heavy traffic, noise nuisance and cold, damp housing. Positive factors include local amenities, play facilities, parks and gardens, community and neighbourhood assets. It is also notable that some groups within society (children, elderly and disabled for example) are more vulnerable to negative factors and other more responsive to opportunities and positive factors. Together all these factors influence our mental wellbeing, and our physical health – particularly our general fitness and our respiratory and cardiovascular health.
- 3.18.4 The District has a particular need for healthy places that support and enable people's wellbeing. Most people live in urban areas where health inequalities are relatively high. Children are more likely to have excess weight by age 11, more people become ill relatively early in life with chronic conditions that could often have been prevented or delayed - respiratory and cardiovascular disease, type 2 diabetes, many common cancers. This means that on average people live fewer years in good health and have shorter life expectancy, and that more people die

under the age of 75 from preventable causes, particularly in areas of high deprivation.

- 3.18.5 Access to green infrastructure can have a positive impact on mental health, with research indicating that depression rates can be 30% higher in areas with lower access to green space and access to green space leads to immediate improvements in mental wellbeing.⁴
- 3.18.6 The way that we plan and design places can make it easier for people to get physically active – walking more, cycling safely; to afford decent housing; and to live in streets, neighbourhoods and developments with public places to stop, rest and chat. All of these features can help to build a sense of community and reduce social isolation and have a positive impact on mental health.
- 3.18.7 Adopting a healthy place approach will help to achieve this and to meet the NPPF requirement that planning policies, processes and decisions should ‘aim to achieve healthy inclusive and safe places which promote health and well-being with a high standard of amenity for existing and future users’ (paragraph 127b); that ‘promote social interaction’, ‘are safe and accessible’ and ‘enable and support healthy lifestyles, especially where this would address identified local health and well-being needs’ (paragraph 91) and ‘take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community’ (paragraph 92B).
- 3.18.8 This new core policy SC10 – Healthy Places considers sustainable development alongside the LA’s responsibility under the 2012 Health and Social Care Act to meet local health and wellbeing needs and reduce health inequalities. It also tasks all stakeholders with a responsibility for sustainable development to co-ordinate and work effectively with health and social care partners.
- 3.18.9 Policy SC10 will help to meet the District’s wider ambitions, contributing to ambitious economic growth as well as to the Local Plan and helping to deliver the four priorities of ‘Connecting People and Place’ in Bradford District’s Joint Health and Wellbeing Strategy for 2018-2023:
- Our children have a good start in life
 - People in Bradford District have good mental wellbeing
 - People everywhere in the District can live well and age well
 - Bradford District is a healthy place to live, learn and work
- 3.18.10 The Council’s Public Health team have considered a range of evidence reviews to identify 10 key principles for creating healthy places that are relevant to Bradford District. These principles are:
1. **Contributes to a healthy, sustainable and well-connected District** - Well-connected neighbourhoods are active, healthy, networked places where

⁴ <https://www.ecehh.org/research/nature-prescription/>

people can walk, cycle, scoot for everyday travel to work and local amenities, and connect easily to public transport to travel further afield⁵. Places become sustainable when people have what they need close to where they live - a mix of local businesses, shops, transport links, amenities such as GPs, schools and public open spaces. This will mean discouraging and rejecting proposals for unsustainable, standalone developments, or over-development in places with few local amenities.

2. **Prioritises pedestrians and active travel** - Healthy places are designed around people rather than traffic, making them safe, attractive places to live, work, play and socialise. Safe, walkable streets with shade and shelter, suitable signage and places to rest and cross safely allow more people to walk to local destinations or undertake longer journeys. This will mean developers and designers thinking about people first when designing streets or housing developments and also the re-education of road users as part of the package to build more people friendly streets. Children and young people are also some of the most active users of outdoor spaces in communities. This is a different starting point from design that begins with a route for vehicles and parking and then fits homes and possibly walking and cycling routes around the road design.
3. **Includes active-design principles to shape the built environment** – Active design builds physical activity into people’s daily lives - at home, in workplaces, public buildings, streets and parks. Examples include - connecting or extending existing paths and cycleways to new developments, signing walking routes with times to destinations, including walking routes, exercise and gardening opportunities within developments including older persons housing. Placing stairs centrally in new buildings to increase their use, saving lifts for people who need them. It is critical that external spaces and activities are welcoming to and inclusive to all – that all groups (by age, ethnicity, gender and physical ability) feel that they have a stake in using them.
4. **Supports Healthy Streets** – Streets need to host and facilitate different aspects of people’s lives. Communities should have the opportunity to lead work with the Council to decide priorities for improvement. Some streets are transport corridors, they need to be safe for everyone to travel along, have good air quality and be safe and easy to cross so that communities are not cut-off. Other streets are mainly commercial, likely to need a broader, healthier offer to residents and visitors in future. With free places to sit, wait, meet up they can become places where people choose to spend time, visiting local businesses and amenities as well as passing through. In any place the large majority of streets are residential – amenable to traffic-calming to create more inclusive, social places, which anyone can use safely.

⁵ Public Health England (2017) op cit.

5. **Increases and improves urban green space and green infrastructure** - Green streets, spaces and features support wellbeing and create opportunities for play and leisure supporting our health, sociability, community cohesion and learning as well as create practical attractive, useable walking routes to local amenities, shops and businesses. Trees, hedges, verges, gardens, and green spaces provide shade, support wildlife and help urban areas not to overheat. Green roofs and walls can support wildlife, absorb water and cool buildings.
6. **Creates inclusive, welcoming, safe neighbourhoods** - Healthy places are inclusive, safe and easy for everyone to live in and move about in. Local organisations and assets thrive, community life is supported. Inclusive, useable public spaces add economic value to an area by drawing people in, and providing reasons for them to stay. People can meet, chat, stop and rest - social isolation is reduced.
7. **Provides an appropriate and varied mix of play opportunities for different ages** – Children need to be active every day to be healthy. This is more likely to happen when they can safely play or be outdoors. While younger children will need to play safely close to home, older children may enjoy playing further away from home and be mobile over longer distances. All developments should provide gardens and/or safe, useable open or green space. Including this in all new developments and building play features into urban public spaces will help to achieve this. Traffic calming and shared space in residential streets, can help to make outdoor play safer. Designing new developments to keep streets as free of cars as possible will facilitate doorstep play, and designing safe routes to and from play destinations is important for children playing ‘away’ from home. Well-designed spaces can also encourage intergenerational play, supporting community cohesion, and improved health and well-being.⁶
8. **Supports ambitious standards for new homes, investment in existing homes** - Wellbeing is improved by accessible, affordable high-quality housing that is energy efficient, secure and well-designed both externally and internally. The 2019 Homes and Neighbourhoods Design Guide describes what the District is looking for. High standards for renovation of existing housing stock are needed to bring older stock up to standard. The planning process can ensure that standards are not diluted as applications progress through.
9. **Allows people to access and prepare healthy food where they live** – Healthy places provide the conditions for people to grow, buy and prepare affordable, healthy food. All residential properties should provide adequate cooking facilities. Healthy food retail outlets can be squeezed out by oversupply of hot food takeaways. Fresh produce markets - fixed or mobile -

⁶ <https://www.planning4cyp.com/>

can play a key role, particularly in under-served areas. Encourage the provision of allotments, edible front gardens and food planting within streets and neighbourhoods. Planning policy and decisions can play a role in achieving balance.

10. **Business development supports health and wellbeing** – by bringing decent jobs, workforce learning and development. Healthy business development should enhance the mix of local opportunities and amenities. Workplaces should be safe, health-promoting, located to facilitate active travel and use of public transport and ideally premises are designed and equipped to allow active work breaks.
- 3.18.11 This new core policy SC10 – Healthy Places considers sustainable development alongside the Local Authority’s responsibility under the 2012 Health and Social Care Act to meet local health and wellbeing needs and reduce health inequalities. Policy SC10 seeks to use these principles to meet the requirements of NPPF 2019 to promote healthy and safe communities and to shape healthy, thriving places that will support current residents and attract new people to live and work in the District.
- 3.18.12 The policy should be read in conjunction with other key core strategy and supplementary guidance to help create healthy places including HO9 Housing Quality, P1: Presumption in favour of sustainable Development, SC9: Making Great places; TR1: Travel reduction and Modal Shift; HO9 Housing Quality; EC2 Supporting Business and Job Creation; EN1 Protection and improvements in provision of open space and EN8 Environmental Protection. Cross over with Supplementary Planning Documents – on Hot Food Takeaways, the ‘Bradford District Homes and Neighbourhoods Design Guide 2019’ and the forthcoming ‘Bradford District Street Design Guide’.

Preferred Option: Strategic Core Strategy SC10: Creating Healthy Places

The Council and its partners will seek to create healthy places by maximising health and wellbeing gains from development proposals and ensuring that negative impacts are designed out or mitigated. Development that provides opportunities for healthy lifestyles, contributes to creating healthier communities and helps to reduce health inequalities will be supported.

The Local Plan will promote health and wellbeing and the creation of healthy places in the District by ensuring that future development:

i. Contributes to a healthy, sustainable and well-connected District by:

- Directing new development towards well connected locations to enable active travel, (refer to policy TR1 Travel reduction and Modal Shift and TR3; TR3: Public Transport, Cycling and Walking; TR5: Improving Connectivity and Accessibility);
- Contributing towards inclusive, welcoming and safe neighbourhoods. (See policy DS5: Safe and Inclusive places.)

- Avoiding factors that negatively affect climate change while contributing to prevention measures that mitigate against the effects of climate change, (refer to policy SC2: Climate change and resources);
- Seeking environmental improvements that minimise exposure to pollutants and improving air quality, (refer to Policy EN8: Environmental Protection)
- Supporting the delivery of housing, jobs and essential community services (see policy HO1 The District's Housing Requirement; EC2: Supporting business and job creation and Section 4: sub area policies)

ii. Prioritises pedestrians and active travel by designing places that promote walking and cycling. (see Policy TR3: Public Transport, cycling and walking and DS4:Streets and movement)

iii. Supports active-design principles to shape our built environment to maximise opportunities for physical activity.

iv. Supports the Healthy Streets principle of promoting well designed and safe places.

v. Supports the provision, protection and improvement of multifunctional green infrastructure, open space and leisure and recreation facilities (see policies SC6: Green Infrastructure; EN1: Protection and improvements in provision of open space);

vi. Enables an appropriate and varied mix of play for children of different ages and allows for intergenerational play;

vii. Supports standards for new homes and neighbourhoods as set out in the 2019 Homes and Neighbourhoods Design Guide and HO9: Housing Quality;

viii. Allows people to access and produce healthy food where they live by supporting the protection of allotments (see Policy EN1 that protects allotments, and the Hot Food takeaway SPD) and supports the delivery of additional new spaces for food growing including allotments.

ix. New employment generates decent jobs that support health and wellbeing and provides healthy working environments. (See policy EC2)

As part of contributing and delivering healthy places:

Developer contributions towards new or enhanced health care infrastructure/facilities will be sought, in line with the provisions of policy ID3, where development would result in a shortfall or worsening of provision. This will be informed by the Local Infrastructure Plan and through consultation with local health care providers/commissioners;

Applications for major development proposals should be supported by a Health Impact Assessment (HIA) to demonstrate that consideration has been given to health and wellbeing.

Proposals for additional health care infrastructure facilities should be located where they can be served by public transport or well related to walking and cycling routes. Where appropriate, opportunities for the multi-use and co-location of facilities with services will be supported, in order to assist in the co-ordination of local service provision and allow greater convenience for residents.

3.19 Reasonable Alternatives

3.19.1 The reasonable alternatives to the Preferred Option considered and discounted are detailed below:

- Do not introduce a new policy – would rely on health themes within a range of current policies – may make it difficult for applicants to fully consider the importance of healthy communities at a strategic level.
- Reduce scale of policy and exclude Health Impact Assessment – may lead to a partial or fragmented policy and need for further updates.
- Significantly reduce scale of policy and refer to SPD for supporting detail – there is a need for effective policies within the Local Plan and potential risk that the policy would not provide sufficient detail.

Consultation Question 8

Preferred Option: Strategic Core Policy SC10: Creating Healthy Places

The policy provides a strategic context to creating healthy places, introduces health impact assessments for major developments and policy on the location of new health facilities / infrastructure.

Q8. Please provide your comments for Policy SC10 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

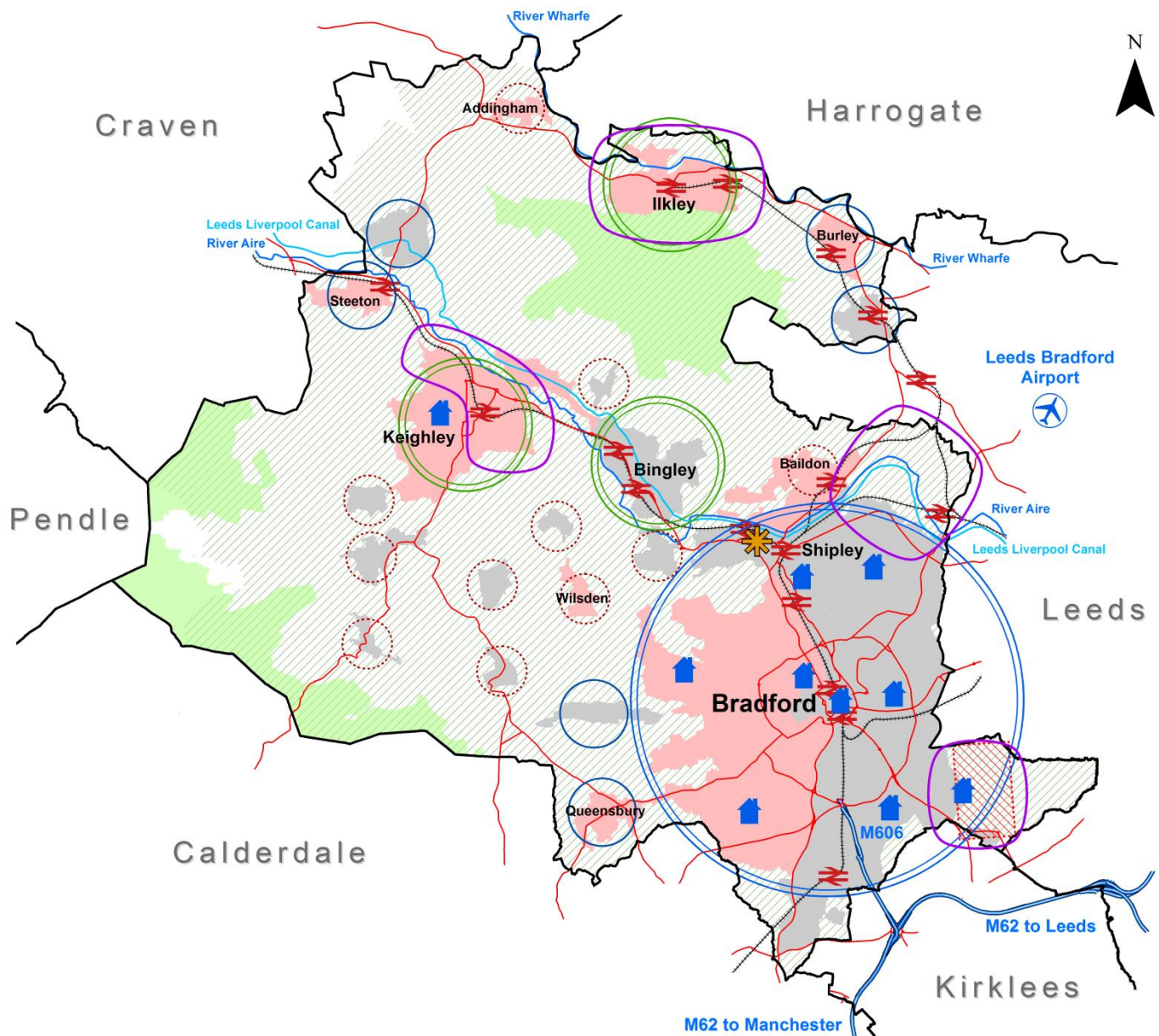
3.20 Draft Key Diagram

3.20.1 The Draft Key Diagram (Figure 3.1) brings together the main components of the Core Strategy Partial Review. It shows the spatial distribution of development proposed (including areas of search), the Green Belt and areas of limited Green Belt release, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).

3.20.2 Green infrastructure, transport improvements and employment growth areas will be added at the publication of the Regulation 19 consultation document. Therefore the Key Diagram is draft at this stage.

3.20.3 The Draft Key Diagram is a diagrammatic representation and should be considered in conjunction with the relevant policies.

Figure 3.1: Draft Key Diagram



Key

	Regional City (Policy SC4)		Saltaire World Heritage Site
	Principal Towns (Policy SC4)		Motorway
	Local Growth Centre (Policy SC4)		A Road
	Local Service Centre (Policy SC4)		Leeds Liverpool Canal
	Green Belt (Policy SC7)		River
	South Pennine Moors SPA and SAC (Policy SC8)		Railway Station
	Sustainable Urban Extension (Policy BD1, HO2 and HO3) *		Railway Line
	Area of search for Employment development (Policy EC3) *		
	Housing Growth Area (Policy HO2) *		
	Settlement with no Green Belt release		
	Settlement with limited Green Belt release (Policy HO3)		

*Sites shown are indicative. Exact locations/boundaries to be determined through the Allocations DPD.

SECTION 4

Sub Area Policies



Section 4: Sub Area Policies

4.1 About

4.1.1 This section of the plan sets out the spatial development framework for four sub areas of:

- Regional City of Bradford including Shipley and Lower Baildon
- Airedale
- Wharfedale
- Pennine Towns and Villages

4.1.2 The main focus for the partial review has been updates to the spatial policies (BD1, AD1, WD1 and PN1) and investment priorities policies (BD2, AD2, WD2 and PN2).

4.1.3 The Sub Area Diagrams to help visualise the policy priorities have not been re-produced in this section but will be published as part of the Regulation 19 consultation.

4.2 Preferred Option: Sub Area Policy BD1: The Regional City of Bradford including Shipley and Lower Baildon

4.2.1 The sub-area policy has been updated to reflect:

- the updated Policy HO3 and identified distribution of residential growth;
- a clearer referencing to regeneration area priorities, and
- an alignment to updated strategic and thematic policies.

4.2.2 Sub Area Policy BD1 is likely to be updated following the completion of detailed work on employment evidence.

Sub Area Policy BD1: The Regional City of Bradford including Shipley and Lower Baildon

A. Strategic Pattern of Development

In accordance with Policies H03 and EC3, the Regional City of Bradford (including Shipley and Lower Baildon) will accommodate ~~27,750~~ 18,400 dwellings and at least ~~100~~ 40 Ha of new employment land in the period up to ~~2030~~ 2037.

The broad distribution of housing development is shown as follows:

	Number of residential units
Bradford City Centre	3,500 <u>4,000</u>
Shipley & Canal Road Corridor	3,100 <u>2,400</u>
Shipley	750 <u>400</u>
North East	4,400 <u>2,000</u>

South East	6,000 3,100
South West	5,500 3,500
North West	4,500 3,000

Affordable housing requirements are set out in Policy HO11

B. Urban Regeneration ~~and Renewal~~ priorities:

1. Bradford City Centre will see intensification of uses with the creation of ~~3,500~~ 4,000 new homes and new jobs by ~~2030~~ 2037. New homes will be created in a number of ways including on new sites, redevelopment opportunities and re-use of existing buildings, including a range of house types and sizes. New jobs will be created in the professional, financial, food, knowledge and creativity sectors. Within the City Centre there will be a requirement for high quality public realm linked to the City Park and other open spaces providing a unique setting for shopping, tourism, culture and leisure experiences, as well as an improved office offer ~~new Central Business District supplying grade A office space~~. Regeneration of the City Centre will be supported through restructuring shopping and visitor experiences, major investment in public transport infrastructure, the effective management and enhancement of the historic environment and coordinated masterplanning to yield commercial and investment opportunities.

2. The Shipley and Canal Road Corridor will see the creation of ~~3,100~~ 2,400 new homes by ~~2030~~ 2037. New homes will be provided in a range of locations in particular the centre section. ~~As part of the Urban Eco Settlement ambitions t~~ The Corridor will deliver sustainable buildings with innovative and contemporary architecture, Bolton Woods wildlife area and a linear park and water features linking the town centre of Shipley to the City Centre of Bradford. This will all be supported by the creation of new cycleways and footways, and improvements to Frizinghall station and new road infrastructure including Canal Road Corridor Improvements and the Shipley Eastern Link Road. Opportunities to further improve public transport will be taken wherever possible.

3. Supporting the economic, environmental, physical and social transformation of key regeneration areas including:

- Inner city areas of Manningham and Little Horton
- North East Bradford – Ravenscliffe and Thorpe Edge
- East Bradford – Barkerend, Beech Grove, Bradford Moor, Thornbury, Woodhall and Laisterdyke
- South East Bradford – Bierley and Holme Wood
- South West Bradford – Buttershaw and Woodside
- West Bradford - Allerton

~~Peripheral communities, in particular Allerton, Bierley, Holme Wood, Ravenscliffe, Thorpe Edge, Buttershaw, Woodside and inner city areas of Manningham, Little Horton and Laisterdyke will see comprehensive regeneration initiatives (such as Leeds Bradford Corridor and Airedale Corridor) and the f~~ 4. Fostering of new sustainable mixed communities via the creation of new housing and economic growth and community

infrastructure.

C. Growth is proposed in the Regional City of Bradford (excluding city centre) as follows:

- ~~2.~~ 1. North East Bradford, will see the creation of ~~4,400~~ 2,000 new homes with associated community facilities, in particular open space and recreation facilities. The new homes will be delivered by a mix of sites ~~but will include some local green belt changes~~ in sustainable locations. The delivery of premium quality employment sites creating space for high tech, bio-tech, environmental and research and development specialisms and improvements to public transport and road infrastructure will support growth within this important investment corridor. Growth will also link to supporting the regeneration of priority areas and support green infrastructure development. A new high quality employment opportunity including research and development and commercial enterprise will be located at Apperley Bridge (complemented by the new railway station and planned improvements to the Harrogate Road / New Line Junction). Walking and cycling networks will be enhanced including the upgrading of the canal towpath between North Bradford and Leeds.
- ~~1.~~ 2. South East Bradford, will see the creation of ~~6,000~~ 3,100 homes with associated community facilities and infrastructure, in particular open space, ~~and~~ recreation and local facilities together with employment opportunities helping serve the local area and maximising opportunities for connectivity to the wider City Region. This will be achieved via development and remodelling within the existing Bierley and Holme Wood urban regeneration areas together with an integrated, well connected and high quality designed Sustainable Urban Extension (SUE) within the Green Belt at Holme Wood and if required other smaller ~~local g~~ Green Belt changes in sustainable locations. ~~, if required.~~ Improvements to the highway network infrastructure will provide access to the urban extension at Holme Wood and improve connections to the Motorway network and communities in Kirklees and Leeds to the South East of Bradford. Improvements will also be made to the walking, ~~and~~ cycling and green infrastructure network.
- ~~4.~~ 3. South West Bradford will see the creation of ~~5,500~~ 3,500 new homes. The new homes will be delivered by a mix of sites including redevelopment and intensification within the urban area and a significant contribution from ~~local g~~ Green belt changes in sustainable locations. Provision will be made for associated community facilities. Improvements will be made to the Outer Ring Road in this quadrant to reduce delays for orbital traffic. Significant public transport improvements ~~Bus priority measures~~ will be introduced ~~on some radial routes~~ and ~~conditions for~~ pedestrians and cycling sts infrastructure will be improved.
- ~~3.~~ 4. North West Bradford, will see the creation of ~~4,500~~ 3,000 new homes. The new homes will be delivered by a mix of sites including redevelopment and intensification within the urban area and a ~~substantial~~ significant contribution from local g Green Belt changes in sustainable locations. Provision will be made for associated community facilities including schools, greenspace, open spaces and facilities for

children and younger people, and high quality bus services providing links to Bradford City Centre. Improvements will be made to the Outer Ring Road in this quadrant to reduce delays for orbital traffic. Significant public transport improvements ~~Bus priority measures~~ will be introduced ~~on some radial routes~~ and ~~conditions for~~ pedestrians and ~~cyclists~~ infrastructure will be improved.

5. Shipley will see the creation of 750400 new homes ~~by 2030~~ together with associated community facilities and new employment opportunities. The new homes will be delivered by a mix of sites ~~but will include some local green belt changes~~ in sustainable locations. The location and design of development will have regard to the requirement within Policy EN3 to conserve those elements which contribute to the Outstanding Universal Value of Saltaire.

D. Economic Development

1. The Regional City of Bradford will be the principal focus for economic development and growth and a vital component of the Leeds City Region.
2. Support Bradford City Centre as the prime office, small and medium sized creative and knowledge industries, shopping, leisure and tourism focus through the Central Business District, City Park and the Bradford Learning Quarter initiatives (linked to Further and Higher Education Institutions).
3. South Bradford including the M606 Corridor will continue to be the location of choice for large scale industry, including storage and distribution making best use of transport connections linked to other employment sites adjoining the District in Leeds and, Kirklees.
4. Support the role of Shipley Town Centre as a location for a mix of retail, leisure and office developments benefiting from excellent rail and road connections to Regional Cities of Bradford and Leeds including the proposed Shipley Eastern Link Road.
5. Encourage leisure and tourism led mixed use developments in Saltaire which include enhancements to public realm, improved links between Saltaire and Shipley Town Centre whilst respecting the 'outstanding universal value' of the UNESCO World Heritage Site status of Saltaire for present and future generations.
6. Support the roles of the Council, the Health Authority and the Education Authority as significant generators of direct and indirect employment in the District.
7. Help to improve ~~s~~ access to job, skills and training development opportunities within the Regional City of Bradford and Leeds City Region in particular for disadvantaged communities.

8. Maximise economic opportunities within regeneration areas, Holme Wood SUE, enterprise zones and business development zones.

9. Encourage the growth of high value industries, including bio-tech, environmental, R&D, IT and advanced manufacturing.

E. Environment

- 1. Enhance the role of the Green Belt between Bradford and Leeds as a high quality Country Park for active recreational leisure for residents of both districts.**
- 2. To improve green links between urban area and open countryside linked to new development.**
- 3. Improve and enhance recreation provision in support of new development.**
- 4. Improve and enhance green infrastructure networks within the urban area along the Shipley & Canal Road Corridor, within Bradford City Centre and to the East and West along key public transport corridors, in particular the Leeds Bradford Corridor. Aim to create space for water along the Bradford Beck Corridor to reduce flood risk and improve the quality, management and biodiversity value of water and adjoining land.**
- 5. Conserve and enhance the area's designated and undesignated heritage assets in particular those in the Bradford City Centre, Little Germany, Goitside and the Registered Battlefield at Aldwalton Moor.**
- 6. Use the opportunities provided by significant increase in development to maximise renewable energy generation and energy efficiency, including neighbourhood CHP.**
- 7. Enhance biodiversity including fragments of habitat, where species take refuge, and improve connectivity between such areas to encourage inter-action between people and wildlife.**

F. Transport

- 1. Ensure that strategic patterns of development maximise the opportunities to use non car modes of transport and reduce the overall need to travel through infrastructure investment and application of accessibility standards.**
- 2. Improvements to Bradford Interchange station and Bradford Forster Square station in Bradford City Centre.**
- 3. Improve highway and public transport access to Leeds Bradford International Airport and North Kirklees including a new MASS Transit System and improvements to the junction of Harrogate Road and New Line.**

~~3. Develop light railway or New Generation Transport (trolleybus) linking Bradford Interchange, and Bradford Forster Square.~~

4. Prioritise the delivery of Northern Powerhouse Rail and a station in Bradford City Centre to allow for high speed linkages between the West Yorkshire and Manchester economies.

- ~~4. Develop new railway stations at Low Moor and Apperley Bridge.~~
5. Improve public transport within and to Bradford City Centre and Shipley Town Centre including enhancements to the Calder Valley, Airedale and Wharfedale lines and provide new bus infrastructure priority measures and other public transport enhancements where feasible ~~on radial routes~~ to both centres, including the provision of new and expanded park and ride facilities and supporting infrastructure;
 6. Develop critical road and public transport infrastructure in South East and North West Bradford, the Canal Road Corridor and to the East of Shipley to support ensure the viability and delivery of housing and economic growth in the Regional City of Bradford.
 7. Improve the inner and outer ring roads as well as key transport corridors through the design and appearance of new development and landscaping alongside them, and in accordance with the proposals identified in the Local Infrastructure Plan.
 8. Implement stronger travel demand management in the Regional City of Bradford. ~~as the economy recovers.~~
 9. Improve public transport access between Regional Cities of Bradford and Leeds through the Leeds Bradford Corridor.
 - ~~10. Improve highway and public transport access to Leeds Bradford International Airport, including a new rail or tram train link from Bradford and Shipley and improvements to the junction of Harrogate Road and New Line.~~
 - ~~11. 10. Improve and provide new cycling, and pedestrian and green corridor infrastructure. Improve public rights of way and canal towpaths.~~
 11. Reduce transport related greenhouse gas emissions and improve air quality through the delivery of improved public transport network, which is highly accessible and reliable; and support the provision of active travel and low emission transport infrastructure.

4.3 Reasonable Alternatives

- 4.3.1 A less extensive update to the policy was considered a reasonable option, although this would not align with updates to other policies within the plan.

Consultation Question 9

Preferred Option: Sub Area Policy BD1: The Regional City of Bradford including Shipley and Lower Baildon

Update to the policy to include updated distribution of growth figures and alignment with other updated policies.

Q9. Please provide your comments for Policy BD1 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

4.4 Preferred Option: Sub Area Policy BD2: Investment Priorities for the Regional City of Bradford including Shipley and Lower Baildon

4.4.1 Policy BD2 has been updated to reflect changes made to policy BD1.

Sub Area Policy BD2: Investment Priorities for the Regional City of Bradford including Shipley and Lower Baildon

In order to deliver transformation and change in the City of Bradford including Shipley and Lower Baildon through economic development, housing renewal and growth, and improved green infrastructure, community facilities and accessibility, public and private sector investment will be targeted:

A. To improve walking, cycling and public transport infrastructure, particularly to Bradford City Centre, to enhance the ease of movement and improve access to jobs within the City particularly for disadvantaged communities.

B. To support the regeneration of Bradford City Centre to deliver enhancements to the public realm, ~~new~~ central business district, significant improvements to public transport, railway stations and rail infrastructure and maximise the potential of heritage assets.

C. To provide infrastructure to support site assembly, manage flood risk, and improve access to Bradford City Centre, Shipley town centre as part of regeneration initiatives on the Shipley and Canal Road Corridor including development of a Shipley Eastern Relief Road.

D. To support the economic, environmental, physical and social transformation of key regeneration areas as identified in Policy BD1 and D.
~~To~~ take advantage of the close proximity ~~of the City Centre's~~ of Bradford and Leeds City Centres and deliver renewal including ~~of existing~~

~~peripheral communities~~, training, education and skills programmes and support site assembly including improvements to the quality and capacity of public transport, in particular with Airedale, Kirklees and Leeds.

E. To support a ~~local and~~ high quality sustainable urban extension in SE Bradford at Holme Wood through development, site assembly, improvements to the quality and capacity of public transport through application of the accessibility standards including improved highway infrastructure and enhancement of the landscape setting, community and green infrastructure and its role for recreation, employment and local services.

F. Towards additional strategic highway and rail improvements as identified in the Local Infrastructure Plan to include Northern Powerhouse Rail and a MASS transit system, to be delivered through new routes and incorporating changes to existing and former rail lines.

G. To support the development and extension of high speed broadband especially in rural and other less accessible areas.

4.5 Reasonable Alternatives

4.5.1 No reasonable alternatives are identified.

Consultation Question 10

Preferred Option: Sub Area Policy BD2: Investment Priorities for the Regional City of Bradford including Shipley and Lower Baildon

Policy has been updated to generally reflect changes to Policy BD1 and updates to strategic and thematic policies.

Q10. Please provide your comments for Policy BD2 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

4.6 Preferred Option: Sub Area Policy AD1: Airedale

4.6.1 The sub area policy has been updated to reflect:

- the updated Policy HO3 and identified distribution of residential growth;
- an updated focus on regeneration area priorities, and
- an alignment to updated strategic and thematic policies.

4.6.2 Sub Area Policy AD1 is likely to be updated following the completion of detailed work on employment evidence.

Sub Area Policy AD1: Airedale

A. Strategic Pattern of Development

In accordance with Policies H03 and EC3, Airedale will accommodate ~~8,450~~ 4,800 dwellings in the period up to ~~2030~~ 2037 and the allocation an increase of new employment land of at least ~~15~~ 30 Ha particularly to support manufacturing, logistics and the media in the digital technology sectors. The broad distribution of housing development is shown as follows:-

	Number of residential units
Keighley	4,500 <u>2,800</u>
Bingley	1,400 <u>800</u>
Silsden	1,200 <u>800</u>
Steeton with Eastburn	700 <u>150</u>
Baildon	350 <u>250</u>
Cottingley	200
East Morton	100

Affordable housing requirements are set out in Policy HO11.

B. Urban Regeneration and Renewal and new housing provision will be focused on the following areas:

Keighley will see the creation of ~~4,500~~ 2,800 new homes and associated community facilities, in particular health provision, local shops and sporting facilities. The new homes will be delivered by a mix of sites including existing capacity within urban area together with ~~a significant~~ some green belt changes contribution from green belt in sustainable locations. Central Keighley will see comprehensive regeneration including housing, starter units for small and medium sized businesses, business park premises for larger digital, design and knowledge and service sectors. Keighley will see high quality mixed use development in the town centre and including former ~~Keighley College site, Market Hall, Cavendish Court and Cavendish Retail Park.~~

Heritage-led enhancements focused on historic buildings. ~~such as Dalton Mills.~~ Traffic management schemes will be introduced where appropriate and employment estates regenerated to support local jobs and investment. ~~in Keighley Town Centre and Hard Ings Road Improvement will be completed.~~

Bingley will see the creation of ~~1,400~~ 800 new homes through from a mix of sites including redevelopment ~~of sites~~ within the urban area ~~and some local green belt changes~~ in sustainable locations. Employment will be created in financial, professional and public services, town centre office space and retail and leisure. ~~schemes at 5 Rise shopping centre, former Bradford and Bingley HQ and Lilycroft Mill.~~

Silsden will see the creation of ~~1,200~~ 800 new homes with associated community facilities and ~~the creation of Silsden Rural Business Park. S~~ supporting ~~highway~~ infrastructure. This will be provided together with good public transport, walking and cycling links to Silsden and Steeton railway ~~and bus interchange~~ station.

Steeton and Eastburn will see the creation of ~~700~~ 150 new homes including some ~~local limited G~~ green B belt changes in sustainable locations and associated community facilities and ~~high-quality employment areas with~~ good walking and cycle links to Silsden and Steeton railway ~~and bus interchange~~ station.

Baildon will see the creation of ~~350~~ 250 new homes including from sites within the urban area together with some ~~local limited g~~ Green B belt changes in sustainable locations and associated community facilities.

~~Cottingley and East Morton will see a smaller scale of housing development including some local green belt changes in sustainable locations.~~

C. Economic Development

1. Keighley and Bingley will be the principal focus for indigenous economic development including starter units for small and medium sized businesses, business park premises for larger digital, design, logistic and knowledge, financial and service sectors, including at Royd Ings and Dalton Lane Business Development Zones. ~~at Dalton Lane Business Innovation Zone and Royd Ings.~~
2. Support the role of Keighley and Bingley town centres as locations for a mix of retail, leisure and office developments benefiting from excellent rail and road connections to Leeds, Bradford, Craven and the Central Lancashire region.
3. ~~The creation of employment land at~~ Safeguard Silsden Rural Business Park for future employment use.
4. Support the roles of the Council, the Health Authority and the Education Authority as significant generators of direct and indirect employment in the District.
5. Help to connect disadvantaged communities to jobs, training, education and skills opportunities.
6. Support initiatives for the sustainability and diversification of agricultural and rural enterprise and for the extension of high speed broadband to rural communities.

D. Environment

1. Protect and enhance landscape character and the range of habitats and diversity of species found in the wetlands, woodlands, Pennine Uplands and upland fringe areas of Airedale.

2. Protect and enhance the integrity of the South Pennine Moors SPA/ SAC and identify measures to support valuable upland fringe habitats. For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.
3. Improve green infrastructure along the Airedale river, canal and public transport corridors.
4. Protect and enhance river, beck and canal corridors, their value for improving connectivity between urban and rural areas. Recognise that development could lead to opportunities for improving green infrastructure and flood storage provision, particularly in relation to the Upper Aire.
5. Woodland, groups of trees and habitats are key elements in the landscape and efforts should be made to increase tree cover, particularly in areas where development might be located.
6. Conserve and enhance the designated and undesignated heritage assets of the Airedale Corridor in particular those within the boundary of the Keighley Townscape Heritage Initiative and elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of it's textile heritage in particular Saltaire World Heritage Site, the buildings and structures associated with the Leeds and Liverpool Canal and the prehistoric landscapes.
7. Use the opportunities provided by increased development in the Principal Towns of Keighley and Bingley and the Local Growth Centres of Silsden and Steeton with Eastburn to maximise renewable energy opportunities. ~~generation and energy efficiency through CHP and hydro energy.~~

E. Transport

1. Ensure that strategic patterns of development maximise the opportunities to use non car modes of transport and reduce the overall need to travel through the application of accessibility standards (see Appendix 3).
2. Develop bus rail interchange facilities at Steeton and Silsden Station and Bingley station including enhanced bus network and pedestrian/cycle links to/from both stations.
3. Improve sustainable transport facilities and links within and between the towns and villages in Airedale, including cross valley links. Improve and provide new cycling and pedestrian infrastructure. Improve public rights of way and canal towpaths.
4. Develop critical road infrastructure in accordance with the Connecting Airedale Transport Improvement Project including transport improvements to Hard Ings Road and Keighley Town Centre and any significant highway infrastructure required to facilitate development to the East of Silsden.

5. Improve key transport corridors where feasible, including A650 (Airedale Corridor between Keighley and Bradford), A629/A644 (Keighley to Queensbury) and A6038 (Otley Road).
6. Implement stronger **travel** demand management in Airedale. ~~as the economy recovers.~~
7. Improve public transport access between Airedale, Regional Cities of Bradford and Leeds, as well as Craven.
8. Improve public transport access to Leeds Bradford International Airport by encouraging more direct public transport connections from Keighley and Bingley and through the development of rail or tram train link via Shipley.

4.7 Reasonable Alternatives

- 4.7.1 A less extensive update to the policy was considered a reasonable option, although this would not align with updates to other policies within the plan.

Consultation Question 11

Preferred Option: Sub Area Policy AD1: Airedale

Update to the policy to include updated distribution of growth figures and alignment with other updated policies.

Q11. Please provide your comments for Policy AD1 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

4.8 Preferred Option: Sub Area Policy AD2: Investment Priorities for Airedale

- 4.8.1 Policy AD2 has been updated to reflect changes made to policy AD1.

Sub Area Policy AD2: Investment Priorities for Airedale

In order to deliver transformation and change in Airedale through economic development, housing renewal and growth, and improved green infrastructure, community facilities and accessibility, public and private sector investment will be targeted:

A. To improve public transport, particularly to Keighley, Bingley, Steeton with Eastburn and Silsden, to enhance the ease of movement and improve access to jobs within the Airedale Corridor particularly for disadvantaged communities.

B. To support the **comprehensive** regeneration of Keighley and Bingley town centres to deliver enhancements to the public realm, **green infrastructure**, mixed use **development** ~~retail and leisure schemes~~ on key brownfield sites and improvements to the railway stations.

C. To provide infrastructure to support site assembly, manage flood risk, and improve access between Airedale to Bradford City Centre, Shipley Town Centre as part of regeneration initiatives on the Shipley and Canal Road Corridor and the Connecting Airedale initiative (including Hard Ings Road Improvements).

D. To take advantage of the close proximity of the City Centres of Bradford and Leeds and deliver **the** renewal of existing urban sites, training **and skills development** programmes and support site assembly including improvements to the quality and capacity of public transport along Airedale to Craven, the Regional Cities of Bradford and Leeds and through the application of accessibility standards (see Appendix 3).

E. Support a number of **local G**reen **B**belt releases in sustainable locations that meet accessibility standards to Keighley, Bingley, Silsden and Steeton with Eastburn through development site assembly, improvements to the quality and capacity of public transport, improvements to cycling and walking facilities.

F. To support the development and extension of high speed broadband especially in rural and other less accessible areas.

G. To work with Yorkshire Water and the Environment Agency to understand fully the water and waste water infrastructure requirements needed to support growth and ensure that development proposals are aligned with investment in asset management and catchment management plans.

4.9 Reasonable Alternatives

4.9.1 No reasonable alternatives identified.

Consultation Question 12

Preferred Option: Sub Area Policy AD2: Airedale

Policy has been updated to generally reflect changes to Policy AD1 and updates to strategic and thematic policies.

Q12. Please provide your comments for Policy AD2 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

4.10 Preferred Option: Sub Area Policy WD1: Wharfedale

4.10.1 The sub-area policy has been updated to reflect:

- the updated Policy HO3 and identified distribution of residential growth, and
- an alignment to updated strategic and thematic policies.

4.10.2 Sub Area Policy WD1 is likely to be updated following the completion of detailed work on employment evidence.

Sub Area Policy WD1: Wharfedale

A. Strategic Pattern of Development

In accordance with Policies H03 and EC3, Wharfedale will accommodate ~~2,500~~ **1,425** dwellings and at least 5 Ha of new employment land in the period up to ~~2030~~ **2037**. The Council will work closely with partner organisations to ensure that this development is sensitively managed to create vibrant and sustainable communities.

The broad distribution of housing development is shown as follows:

	Number of residential units
Ilkley	1000 500
Burley In Wharfedale	700 550
Menston	600 300
Addingham	200 75

Affordable housing requirements are set out in Policy HO11

Within the Principal Town of Ilkley, the Local Growth Centres of Burley in Wharfedale and Menston and the Local Service Centre of Addingham, there are opportunities for development through infill whilst retaining the character of these places.

B. Development including new housing provision will be focused as follows: Ilkley will see the creation of ~~1,000~~ 500 new homes focused on urban redevelopment opportunities together with some Green Belt changes ~~significant contribution from green belt changes~~ in sustainable locations. Provision will be made for associated community facilities, in particular new schools as required and provision of recreation and open space to address current deficiencies. Key economic priority sectors include health, digital and professional services.

Addingham will see the creation of ~~200~~ 75 new homes form a mix of sites including some Green Belt changes in sustainable locations together with ~~and~~ associated community facilities.

Burley in Wharfedale will see the creation of ~~700~~ 550 new homes through a mix of sites including ~~redevelopment of sites within the settlement and with~~ a significant contribution from ~~g~~Green ~~b~~Belt changes in sustainable locations, together with associated community facilities.

Menston will see the creation of ~~600~~ 300 new homes based on existing permissions and other opportunities within the settlement boundary ~~and from some local green belt changes~~ together with associated community facilities.

C. Economic Development

1. Ilkley will have an important role as the Principal Town in Wharfedale with cultural, retail, tourism and leisure functions.
2. Support the role of Ilkley Town Centre as a location for a mix of retail, digital, leisure, health and professional services ~~office development~~, on an appropriate scale, benefiting from excellent rail and road connectivity.
3. Support the centres of Burley In Wharfedale, Addingham and Menston for limited retail and leisure development to meet day to day needs and benefit from excellent road and/or rail links.
4. The creation of high quality employment land at Ilkley.
5. Support initiatives for the sustainability and diversification of agricultural and rural enterprise and for the extension of high speed broadband to rural communities.

D. Environment

1. Recognise the importance of cultural associations, ecological significance, archaeological interest (as the setting of pre-historic remains) and landscape character of Rombald's Ridge and its contribution towards the setting and visitor appeal of Ilkley.
2. Protect and enhance the integrity and mosaic of moorland habitats of Ilkley Moor and Rombald's Moor, areas of importance to the North Pennines SPA/ SAC and views from Rombald's Ridge towards the Yorkshire Dales.

3. For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.
4. Protect and enhance the role of the River Wharfe, as a key green infrastructure corridor and the ecosystem services it provides in relation to biodiversity, water quality, flood risk reduction, formal and informal recreation and connection to national assets beyond the District boundary.
5. Recognise the importance of field patterns, tree cover and the wider context of moorland, river and woodland in providing habitats for a diverse range of species and contributing towards Wharfedale's distinctive **biodiversity**, character and its role as a gateway to the wider countryside.
6. Conserve and enhance the designated and undesignated heritage assets of the Wharfe Valley especially those elements which make a significant contribution to the distinct character of this area including the distinctive Victorian and Edwardian heritage of Ilkley and the prehistoric landscapes and rock art of Rombald's Moor.

E. Transport

1. Ensure that strategic patterns of development maximise the opportunities to use non car modes of transport and reduce the overall need to travel.
2. Improve sustainable transport opportunities within and between Ilkley and settlements in Wharfedale, including rail station, cycleway and public rights of way improvements.
3. Implement stronger **travel** demand management in Wharfedale. ~~as the economy recovers.~~
4. Improve public transport access between Wharfedale, Airedale and the Regional Cities of Bradford and Leeds, as well as Craven.
5. Improve surface access and public transport access to Leeds Bradford International Airport by encouraging more direct public transport connections from Ilkley.

4.11 Reasonable Alternatives

- 4.11.1 A less extensive update to the policy was considered a reasonable option, although this would not align with updates to other policies within the plan.

Consultation Question 13

Preferred Option: Sub Area Policy WD1: Wharfedale

Update to the policy to include updated distribution of growth figures and alignment with other updated policies.

Q13. Please provide your comments for Policy WD1 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

4.12 Preferred Option: Sub Area Policy WD2: Investment Priorities for Wharfedale

4.12.1 Policy WD2 has been updated to reflect changes made to policy WD1.

Sub Area Policy WD2: Investment Priorities for Wharfedale

In order to deliver transformation and change in Wharfedale through economic development, housing growth, and improved green infrastructure, community facilities and accessibility, public and private sector investment will be targeted:

A. To improve public transport, particularly between Ilkley, Burley in Wharfedale and Menston, to enhance the ease of movement and improve access to jobs within the Wharfedale Corridor particularly for disadvantaged communities.

B. To invest in Ilkley town centre to deliver enhancements to the public realm, **green infrastructure and** mixed use **development retail and leisure schemes** on key brownfield sites and improvements to the railway station.

C. To provide infrastructure to support site assembly, manage flood risk, and improve access between Wharfedale to the Regional City of Bradford and Airedale.

D. To support improvements to the quality and capacity of public transport along Wharfedale to Craven, the Regional Cities of Bradford and Leeds.

E. Support a **limited** number of local **gGreen bBelt** releases in sustainable locations to Ilkley, and Burley and through development site assembly, improvements to the quality and capacity of public transport including new road infrastructure and links along the Wharfedale corridor.

F. To support the development and extension of high speed broadband especially in rural and other less accessible areas.

4.13 Reasonable Alternatives

4.13.1 No reasonable alternatives identified.

Consultation Question 14

Preferred Option: Sub Area Policy WD2: Wharfedale

Policy has been updated to generally reflect changes to Policy WD1 and updates to strategic and thematic policies.

Q14. Please provide your comments for Policy WD2 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

4.14 Preferred Option: Sub Area Policy PN1: South Pennine Towns and Villages

4.14.1 The sub-area policy has been updated to reflect:

- the updated Policy HO3 and identified distribution of residential growth, and
- an alignment to updated strategic and thematic policies.

Sub Area Policy PN1: South Pennine Towns and Villages

A. Strategic Pattern of Development

In accordance with Policy H03, the South Pennine Towns and Villages will accommodate ~~3,400~~ 1,525 dwellings in the period up to ~~2030~~ 2037. The Council will work closely with partner organisations to ensure that this development creates vibrant and sustainable communities. The broad distribution of housing development is shown as follows:

	Number of residential units
Queensbury	1,000 <u>300</u>
Thornton	700 <u>500</u>
Cullingworth	350 <u>150</u>
Denholme	350 <u>200</u>

Harden	100 25
Haworth	400 275
Oakworth	200
Oxenhope	100 25
Wilsden	200 50

Affordable housing requirements are set out in Policy HO11

B. Housing ~~and Economic growth~~ will be focussed on the following areas:

The Local Growth Centre of Queensbury will see the provision of 300 new homes from a mix of sites including some local Green Belt changes in sustainable locations. The Local Growth Centre of ~~and~~ Thornton will ~~between them~~ see the creation provision of ~~new employment and 1,700~~ 500 new homes from a mix of sites within the urban area ~~together with a significant contribution from green belt change~~ in sustainable locations. Provision will be made for associated community facilities, in particular for children and younger people taking advantage of the excellent bus and road connections to the Regional City of Bradford, the Principal Town of Keighley and the town of Halifax.

The Local Service Centres of ~~Cullingworth, Denholme and Haworth~~ Wilsden will ~~between them~~ see the creation of ~~1,100~~ 50 new homes principally from sites within the existing settlement boundaries ~~ies~~ together with limited some local gGreen bBelt changes. ~~Provision will be made for associated community facilities in particular, health care facilities at Denholme, a community centre at Cullingworth and recreational facilities in Haworth.~~

The Local Service Centres of Cullingworth, Denholme, Haworth, Harden, Oakworth and Oxenhope ~~and Wilsden~~ will see between them the creation of ~~600~~ 675 new homes from sites within the existing settlement boundaries ~~together with some local green belt changes.~~ Provision will be made for associated community facilities, in particular, health care, open space and recreational facilities ~~at Harden, Oakworth and Oxenhope~~ to address current deficiencies. ~~Allocation of employment land will support local services and in locations and on a scale that respect both the character and ecological integrity of the area.~~

C. Economic Development

1. Support the economic diversification of settlements to retain local employment in the South Pennines.
2. Support the role of the centres of Queensbury and Thornton as locations for a mix of community facilities benefiting from excellent bus and road connections to the City of Bradford and the Principal Town of Keighley and the town of Halifax.
3. Promote sustainable tourism that respects the Bronte heritage of Haworth and Thornton, the Bronte Parsonage Museum and the importance of the Keighley and Worth Valley Steam Railway.

4. Support initiatives for the sustainability and diversification of agricultural and rural enterprise and for the extension of high speed broadband to rural communities

D. Environment

1. Protect and enhance the biodiversity and landscape character of the Pennine Upland, Wilsden, Worth and North Beck Valley, in particular the cultural associations of the Bronte landscape and the dense patchwork effect of stone wall field boundaries.
2. Protect the ecological integrity, the wilderness appeal and wide-open skylines of the South Pennine Moors from adverse impacts, and, enhance the value and connectivity of upland fringe habitats. For the protection of the South Pennine Moors SPA, avoid and/or mitigate loss or deterioration of important foraging land within the SPA's zone of influence, and mitigate the impact of increasing visitor numbers.
3. Value the historic networks of narrow winding lanes, footpaths and packhorse trails and encourage their use for recreation linked to the local, regional and national cycle and footpath routes.
4. Conserve and enhance the designated and undesignated heritage of the Pennine towns and villages especially those elements which make a significant contribution to the distinct character of this area including: the mills, chimneys and associated housing of its textile heritage; and the buildings and landscapes associated with the Brontes.
5. The close proximity of open moorland to the Pennine Towns and Villages, the significance of heritage assets and viewpoints mean that development, whether sited at the edge of settlements or associated with groups of farm buildings and even on a local scale, must be sensitively managed.
- ~~6. Manywells has been restored to create a new country park to enhance biodiversity and create a place for informal recreation.~~

E. Transport

1. Ensure that strategic patterns of development maximise the opportunities to use non car modes of transport and reduce the overall need to travel.
2. Improve public transport within and between the settlements of the South Pennines, in particular bus improvements.
- ~~3. Implement stronger demand management in the South Pennine Towns and Villages as the economy recovers.~~
- ~~4.~~ 3. Improve public transport, cycling and walking access as appropriate between the South Pennine Towns and Villages, the Regional City of Bradford and neighbouring Principal Town of Halifax.
- ~~5.~~ 4. Support improved transport links within the Pennine towns and villages and to the Regional City of Bradford, the Principal Towns of Keighley,

Ilkley, Bingley and Skipton and the Town of Halifax particularly for the Local Growth Areas of Queensbury and Thornton.

4.15 Reasonable Alternatives

- 4.15.1 A less extensive update to the policy was considered a reasonable option, although this would not align with updates to other policies within the plan.

Consultation Question 15

Preferred Option: Sub Area Policy PN1: South Pennine Towns and Villages

Update to the policy to include updated distribution of growth figures and alignment with other updated policies.

Q15. Please provide your comments for Policy PN1 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

4.16 Preferred Option: Sub Area Policy PN2: Investment Priorities for the Pennine Towns and Villages

- 4.16.1 Policy PN2 has been updated to reflect changes made to policy PN1.

Sub Area Policy PN2: Investment Priorities for the Pennine Towns and Villages

To manage change in the Pennine Towns and Villages **on** **an appropriate** scale that meets needs for housing, employment and renewal, enhances green infrastructure, heritage assets, community facilities and improves sustainable means of transport Partnership working between the public and private sectors, key stakeholder bodies and local communities should focus on:

A. Improving public transport, particularly to Queensbury, Thornton and Haworth, to enhance the ease of movement and improve access to jobs within the Regional City of Bradford, Airedale Corridor and Calderdale particularly for disadvantaged communities.

B. Supporting sustainable economic, retail and leisure development where this is of a scale appropriate to the settlement, involves the re-use of an existing building, is located on land of the least environmental or amenity value and provides sensitive enhancement of heritage assets or public realm.

C. Managing flood risk, and improve access between Pennine Towns and Villages to Bradford City Centre, Keighley Town Centre and Halifax Town Centre as part of district wide regeneration initiatives.

D. Encouraging locally based enterprises, initiatives that develop community resilience and sustainable regeneration and tourism that respect the character of the South Pennines.

E. Showing respect for and enhancing the moorland setting, character and integrity of traditional gritstone buildings and features, routes and viewpoints associated with the Brontes, early stages of agriculture and development of the textile industry.

F. To support the development and extension of high speed broadband especially in rural and other less accessible areas.

4.17 Reasonable Alternatives

4.17.1 No reasonable alternative identified.

Consultation Question 16

Preferred Option: Sub Area Policy PN2: Investment Priorities for the Pennine Towns and Villages

Policy has been updated to generally reflect changes to Policy PN1 and updates to strategic and thematic policies.

Q16. Please provide your comments for Policy PN2 and any suggested changes to the policy?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

SECTION 5

Thematic Policies:
Economy & Jobs



Section 5: Economy and Jobs

5.1. About

5.1.1. This section of the local plan is concerned with the thematic policies which seeks to ensure the delivery of prosperity, economic growth and jobs. The partial review of the plan is supported by a new set of economic evidence which has informed key updates to:

- the District's Employment Land Requirement;
- Employment Distribution;
- Total Jobs Target;
- Economic Growth Priorities and Sectors, and
- the District Centres.

5.1.2 Based on evidence in the Employment Needs Assessment and Land Review 2019 (ENALR) the Bradford District is considered a self-contained Functional Economic Market Area (FEMA) and an appropriate economic market area for local plan making purposes. However, the District has a varied and diverse economic make-up with a range of areas from urban centres, to smaller towns and villages. Within the District there are four sub areas identified in the ENALR which are the focus for specific economic sectors:

- City of Bradford
- Airedale
- Wharfedale
- Pennine Towns and Villages

5.1.3 The ENALR indicates that there is a need for a variety of types and sizes of employment units, with varying land size requirements. It is important for the Local Plan to ensure that there is a range of quality, mix of site sizes, and appropriate distribution across the sub-areas to ensure that the employment needs of a variety of economic sectors is met over the plan period. Key economic challenges for the District include low job density, ageing industrial, warehousing and office stock, demographic changes and the need for high quality commercial premises with access to efficient transport infrastructure.

5.2 What you told us

5.2.1 The Council received a wide range of comments on economic topics across policies EC1, EC2, EC3 and EC5. Key headlines included:

- **Skills, training and attainment** – ensuring that there is an increase in skills and education levels to support and attract businesses.
- **Jobs target** - uncertainty over whether the jobs target of 1600 per annum is achievable or lacks ambition - you don't just create jobs by building upon land.
- **Employment land** - the adopted core strategy target of 135 ha of employment land represents a bare minimum when set against the social-demographic requirements of a growing population and the economic aspirations of the LEP and Council. Need to support land for SME and design and technology businesses. 100ha figure is not based upon actual requirements and is aspirational. Wharfedale requirement looks out of balance with other areas and potentially requires a higher figure.
- **Economic growth** - general support for improving the economy but also recognising that there are opportunities for building an economy built upon environmental responsibility and a wider approach to sectoral development including tourism, heritage, creative sectors, technology, sport, recreation and leisure. The future economic potential of historic mills cannot be underestimated and we need to enhance opportunities for the industrial sector. Bradford needs to clearly reposition itself in a competitive economy and focus upon its unique strengths.
- **Align strategies** - need to align the economic policies to the wider economic growth strategy.
- **Linking housing and jobs** - there are opportunities to better link jobs to housing and allow people to travel short distances to places of work while taking advantage of the convenience of urban living.
- **City Centre** - for Bradford to thrive again, its city centre, its retail offering, its leisure facilities and restaurants must attract people into the city, and currently they don't. City centre needs to be improved. Sport can play a positive role in contributing to the evening economy.
- **Parking** – need to get the right balance between parking charges and encouraging visitors and shoppers.
- **Retail** – need to consider a contraction in the retail market as spread over a large area, high levels of vacancies and there have been significant changes in shopping patterns. Support required for smaller retailers and areas. Out of town retail is unsustainable.
- **Public transport improvements** - public transport infrastructure requires significant investment to support growth aspirations and concerns that major projects such as Northern Powerhouse Rail may not be delivered.
- **Physical constraints** - economic growth is in part restricted by the topography of the area.

5.3 Findings and Policy Directions

- 5.3.1 Bradford's economy is underlined by a range of important factors which define its future growth. Bradford has a growing and changing household structure with a large proportion of the population made up of people in the lower age groups and therefore a growing labour force. Whilst this in itself will stimulate economic growth, there is a need to ensure future jobs provision.

5.3.2 The local economy is third largest of the Region. It largely comprises of Small and Medium Enterprises (SMEs) although the District is home to a number of large businesses with recognised brands operating on an international scale. It is also home to successful creative, cultural and tourism-based enterprises attracting a large visitor economy. The economic strategy of the Plan will help build upon these strengths.

5.3.3 However, the District faces a number of challenges that must be addressed:

- unemployment, worklessness and economic inactivity are above regional and UK averages while the working age population is growing;
- skill levels are below regional averages and the proportion of people with no qualifications is growing;
- the District is a low pay area reflecting weak private sector jobs growth and too few high value knowledge businesses;
- the City Centre requires further revitalization and growth in the visitor economy is dependent on regeneration, a better shopping experience and improving the quality and accessibility to the District's attractions, and
- only a modest level of economic growth is anticipated over the next few years, with reduced levels in public expenditure.

5.3.4 The main economic focus of the Core Strategy is to create the conditions where business thrives, generating opportunities to deliver jobs growth and prosperity across the District. It seeks to channel economic development into sustainable locations so that Bradford, together with its principal towns and range of smaller settlements can become a key driver within the Leeds City Region. The Strategy will help foster the District's indigenous companies and also attract the inward investment in the high value, creative and knowledge-based industries by providing an attractive high-quality environment across the District and quality development sites in the most advantageous locations for the market economy. It will make the link with training and education to increase skills levels within the working age population of District's local communities.

5.3.5 In recent years, the Bradford urban area, Bradford City Centre, the M606 corridor and Airedale have been the main centres of the District's economic regeneration successes and achievements. Policy will continue to exploit their roles as dynamic locations of choice for future economic growth. The District also benefits from a thriving tourism economy which the Strategy will help support alongside initiatives for rural diversification. This reflects the Government's Industrial Strategy 'Building a Britain fit for the future' with its local dimension, where the shift in power to local communities and businesses will enable places to tailor their economic development approach to local circumstances. The Core Strategy also aligns with the Leeds City Region Strategic Economic Plan (SEP) and Bradford Economic Growth Strategy, to ensure it will establish a sustainable planning framework to deliver the aspirations set out within these documents.

5.4 Preferred Option: Policy EC1: Creating a Successful and Competitive Bradford District economy within the Leeds City Region

- 5.4.1 The purpose of this policy is to establish the operational priorities for stimulating and managing the economy in spatial terms across the District, and to set out monitoring and delivery mechanisms accordingly. In this respect, a broad policy for a competitive Bradford District sets the context for economic prosperity.
- 5.4.2 In supporting Strategic Core Policy 1, the overall approach and key spatial priorities, Policy EC1 will help transform economic conditions across the District and manage and spread the benefits of economic growth as part of the wider Leeds City Region. It will enhance the role of Bradford as an important business location, with the principal towns and growth centres as hubs for the local economy. It will also help encourage diversification of the rural economy. The Policy will help support the renewal and regeneration of urban and rural areas thus contributing to the aims of Strategic Core Policy 3 – Working Together to Make Great Places together with Strategic Core Policy 4 which determines the hierarchy of settlements and their role in the economic development of the District. The principal areas for future economic growth will be located in the Airedale Corridor, in Bradford City Centre and the Principal Towns, in the M606 corridor and in the North East and South East Bradford-Leeds interface. These Economic Growth Areas will provide a range of sites for new high-quality employment opportunities and commercial enterprise.
- 5.4.3 Policy EC1, together with EC2, EC3 and EC4 provide sufficient coverage to comply with the policy content guidance set out in Section 6 of the National Planning Policy Framework (NPPF), 'Building a Strong Competitive Economy' and the guidance on Plan Making. Planning policy should support sustainable economic growth, and local authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century. In drawing up local plans, planning policies should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.
- 5.4.4 Policy EC1 is very much an overarching policy that brings together the various mechanisms which will lead to the creation of a competitive local economy for Bradford as part of the Leeds City Region. This policy along with the subsequent policies relating to Economy and Jobs is underpinned by a range of strategies and evidence including the Leeds City Region Strategic Economic Plan (2016 – 2036), Bradford District Economic Growth Strategy (2018 - 2030), Understanding Bradford District Report, Bradford Employment Needs Assessment and Land Review (2019) and Bradford District Retail and Leisure Study (2019). The policy has been updated to clearly align with the updated local growth strategy in terms of themes and priorities.

Policy EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region

In order to create a more successful and competitive District economy, ~~plans, strategies, investment decisions and programmes and planning decisions should help to deliver~~ the Council shall support the following key opportunities:

A. Our Young and Enterprising Population

1. A knowledge-driven economy by improving links between job opportunities, skills development and needs, business productivity and investment, and the needs of excluded communities within Bradford District.
2. Supporting the growth and development of the University of Bradford, Bradford College, further and higher education institutions, hospitals and research institutions and other creative industries;
3. Create an entrepreneurial District by supporting business start-ups and their survival, and helping small businesses grow by supporting the provision of incubator units and innovation units in the City of Bradford and the Airedale Corridor.

B. Our Distinctive Offer

1. The Council's priority for Grade A office developments will be Bradford City Centre in line with its priority for regeneration of the city centre and the creation of a revitalised central business district.
2. Prioritise investment in key strategic locations across the District and recognising the role of the Regional City of Bradford as the key driver of productivity,
3. Support opportunities for business relating to the District's unique environmental assets and challenges in support of the move towards a low carbon economy
4. Support a wide of initiatives to support the diversification and sustainability of agricultural and rural businesses.

C. Our Growth Potential

1. Economic growth, restructuring and diversification, taking account of potential job growth indicated by detailed forecasts;
2. A modern manufacturing sector and modernisation of manufacturing industries within the City of Bradford and the Airedale Corridor.
3. Support the land and property requirements of priority sectors and clusters;
4. Support the potential of non-business class sectors, including health, sport, retail, leisure, tourism and education as key

economic and employment generators within the Bradford District.

5. Maximise economic opportunities within regeneration areas, enterprise zones and business development zones.

D. Our Globally Connected District

1. Prioritise the enhanced transport linkages to Leeds Bradford International Airport and Manchester International Airport as significant economic drivers;

2. Support the delivery of fibre optic broadband including Fibre to the Premises (FTTP) and strengthened communications infrastructure, including the installation and take up of improved high-speed broadband in rural and peripheral areas of the Bradford District.

3. Prioritise the delivery of a Northern Powerhouse Rail station in Bradford City Centre to allow for high speed linkages between the West Yorkshire and Manchester economies.

~~A. Economic growth, restructuring and diversification, taking account of potential job growth indicated by detailed forecasts in the Employment Land Review Assessment and updates as they become available.~~

~~B. Investment in locations such as Bradford City Centre, Shipley Town Centre and the Canal Road Corridor, Keighley, Bingley and Ilkley, recognising the role of the Regional City of Bradford and the Principal Towns as key drivers of productivity.~~

~~C. The Council's priority for Grade A office developments will be Bradford City Centre in line with its priority for regeneration of the city centre and the creation of a revitalised central business district.~~

~~D. Improved links between job opportunities, skills development and needs, business productivity and investment, and the needs of excluded communities within Bradford District.~~

~~E. A modern manufacturing sector and modernisation of manufacturing industries within the City of Bradford and the Airedale Corridor.~~

~~F. A knowledge-driven economy, by supporting the potential of the University of Bradford, Bradford College, further and higher education institutions, hospitals and research institutions and other knowledge-intensive industries including the tourism and cultural sector and links with the provision of incubator units and innovation units within Bradford City Centre and the Airedale Corridor.~~

~~G. A more entrepreneurial Bradford District, with the aim of achieving higher rates of business start-ups and survival, and a larger number of small businesses, including the provision of low cost and smaller incubator units for small and medium~~

~~sized enterprises and micro businesses in the City of Bradford and the Airedale Corridor.~~

~~H. Development related to priority sectors or clusters, or individual employers important to the Bradford District economy, where they have specific property requirements.~~

~~I. The role of Leeds Bradford International Airport and Manchester International Airport as significant economic drivers and the need to enhance transport links between the District and the two airports.~~

~~J. The potential of non-business class sectors, including health, sport, retail, leisure, tourism and education as key economic and employment generators within the Bradford District.~~

~~K. Opportunities for business relating to the District's unique environmental assets and challenges, including extraction industries, sustainable construction, renewable energy, resource and waste efficiency and environmental technologies and the 'low carbon economy'.~~

~~L. ICT and communications infrastructure, installation and take up of high speed broadband, particularly as a priority in rural and peripheral areas of the Bradford District.~~

~~M. Support diversification and sustainability of agricultural and rural businesses~~

~~N. A wide range of initiatives to ensure more diverse, competitive and successful economies in the rural areas of the Bradford District.~~

5.5 Reasonable Alternatives

- 5.5.1 The main reasonable alternative relates to undertaking a less significant update to the policy – this may lead to problems in selecting content and creating divergence between the growth strategy and the updated core strategy policy.

Consultation Question 17

Preferred Option:

Policy EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region

Policy EC1 has been subject to a major rewrite to align with the new economic growth strategy for the District.

Q17. Please provide your comments for Policy EC1 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.6 Preferred Option - Policy EC2: Employment Land, Jobs and Skills Requirements

- 5.6.1 Based upon ONS population estimates the District has a total resident population of 537,200 and there are 329,300 people of working age (16-64), which is an increase of 1,400 since 2010. The largest sectors by employees are Manufacturing (13%), Wholesale and Retail Trade; Repair Of Motor Vehicles And Motorcycles (17%), Human Health And Social Work Activities (15.5%) and Education (11%). Earnings are slightly lower than the regional average, with the exception of female full-time workers hourly rate in Bradford which is higher than the regional average. Earnings on a whole however are significantly lower than that of the national average. Qualifications across NVQ 1, 2, 3 and 4 are lower than the regional average and significantly lower than the national average, and the proportion of the workforce with no qualifications being approximately double that of the national average.
- 5.6.2 Of the working age population, 26,700 or 16.8% are classified as 'workless households' – this is higher than regional and UK averages. ONS claimant count data (not seasonally adjusted) indicates that Bradford has higher percentages of claimant counts across all age groups than the regional and UK averages. Bradford currently has the lowest level of unemployment for over 10 years and now only 1% above bench-mark levels. With significant levels of economic inactivity but a relatively low unemployed rate, there are many people within the working population of Bradford who are not actively seeking employment. Approximately 25% of the working age population is classified as economically inactive, which is significantly higher than the national and regional average. This maybe for a variety of reasons, but it demonstrates there is ample potential supply within the working age population to meet the economic growth aspirations for jobs and employment land set out within Local Plan.
- 5.6.3 Policy EC2 reflects the Government's commitment through the NPPF, paragraph 80, to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths. Under Paragraph 81 the document adds that authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; and, set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. In ensuring the vitality of town centres it states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.

- 5.6.4 The ENALR establishes a baseline forecast of 22,100 new jobs by the year 2037, an average of approximately 1300 jobs annually using the Regional Economic Model 2018 and Experian. This was derived from projecting forward the 2018 – 2030 jobs forecast to the year 2037. The reasoning behind the approach is based upon the fact that economic forecasting over such an extensive period (i.e. 2018 – 2037) can be very problematic, and thus only forecasting to 2030 and projecting forward to 2037 is seen as a more reliable methodology for calculating future jobs growth. Employment was anticipated to be driven by growth in the business, professional services, residential care and social work, and health sectors with manufacturing sectors experiencing an overall decline (although slowing).
- 5.6.5 These projections are however based largely on trend-based modelling of how the economy might perform in future years and does not take account of corporate and partner initiatives to boost economic growth potential within the District. Any corporate initiatives led by the Council, Local Enterprise Partnership (LEP) and West Yorkshire Combined Authority (WYCA), are likely to increase the jobs growth. Taking account of the proposed economic growth initiatives planned by the Council and its partners, a jobs target of a minimum 1,600 total jobs per annum (300 per annum uplift on the forecast baseline) will be planned for over the plan period. For the purposes of allocating land to deliver this jobs target, the ENALR used past take-up data of the employment land which has been delivered since 2005 and projected forward to 2037 (minus anomalies which are unlikely to be repeated within the plan period), which equates to a minimum employment land requirement of 60ha.
- 5.6.6 The strategy for a prosperous economy is to create the right conditions and opportunities for significant jobs growth and prioritise the upskilling of the existing working age residents of the District. It is acknowledged through the REM modelling that approximately 75% of future jobs growth (1000 per annum) is expected to be generated through non-B use class jobs, with traditional B Use Class employment growth in business (including offices), general industrial, storage and distribution amounting to about 300 jobs per annum. The Allocations DPD will support the growth in traditional B use class employment uses through land allocations. Policies within the local plan and corporate economic growth initiatives will help support sectors which fall outside traditional B Uses classes.
- 5.6.7 Supporting economic growth through the allocation of employment land to allow existing businesses to grow and new businesses to invest in the District is only one part of the planning strategy. The Council recognises that there are skills mismatches between segments of the working age population and local business demands. The percentage of residents with no qualifications is significantly higher than regional and national averages. As part of a strategy to support local upskilling and reduce economic inactivity within Bradford, the Council is soon to publish a new *People, Skills and Prosperity Strategy*, that contains a number of key initiatives to support skills development and encourage more people into work. One key output of this strategy is the need to encourage the provision of apprenticeship's and other skills training within the construction and operation of major developments. This has

resulted in the on-site provision of skills and training, as set out within Revised Core Strategy Policies EC2 and EC3.

5.6.8 The current employment land portfolio as determined at 1st July 2019 amounted to approximately 87 hectares in total. This comprises of approximately 82 hectares of land allocated in the Replacement Unitary Development Plan together with approximately 5 hectares of land with other forms of planning backing such as planning permission (windfall sites). The ENALR once complete will incorporate a full assessment of the deliverability and potential market demand of the employment land within the Council's current database. This includes remaining allocated employment sites from the Replacement Unitary Development Plan together with other sites which have extant planning permission. A refined portfolio of employment sites will be established as part of Allocations DPD work and also fed back into the publication of the CSPR Regulation 19 consultation document.

5.6.9 The Council is working with businesses and stakeholders on four new Business Development Zones (BDZs) to help boost jobs, investment and support infrastructure improvements - Bowling Back Lane, Bradford; Royd Ings, Keighley; Dalton Lane, Keighley and Salts Mill Road / Dockfield Road, Shipley. It is unlikely that the BDZs will yield significant additional employment land by hectare but could help rationalise space and lead to the more efficient use of land. The M62 Corridor Enterprise Zone (EZ) comprises a number of employment sites across the four West Yorkshire districts of Bradford, Calderdale, Kirkless and Wakefield. Bradford has three M62 EZ corridor sites which are:

- Gain Lane, Bradford
- Parry Lane, Bradford
- Staithgate Lane, Bradford

The EZ sites are included within the current portfolio of forward land supply.

5.6.10 The market intelligence information from the ENALR indicates that initial gaps in the provision of:

- high / best quality employment land;
- larger sites of high quality to facilitate local business movement towards the upper tiers of the current employment land portfolio, and
- sites to support the development of local growth sectors and attract inward investment.

The research undertaken to date also indicates that there is particular locational demand 'hotspots' for good quality employment space towards the north / north east of the Regional City of Bradford, south / south east Bradford and Keighley. There are also particular demands for employment space within the Wharfedale Valley. Demand to the west of the regional city is considered weaker with less swift road access to employment sites.

5.6.11 The Council will look to facilitate the growth of high growth sectors across the District. These vary by sub-areas, and a flexible approach will be taken to allow these sectors to flourish within these locations:

City of Bradford - Retail, Finance and Professional Services, R&D, Public Services, Food Production, and Creative & Cultural Industries including Media.

Bradford South - Manufacturing, Distribution and Specialist Construction

Airedale - Manufacturing, Logistics, Professional and Financial Services and Media

Wharfedale - Health, Digital and Professional Services

Pennine Towns and Villages - Health, Hotels/Restaurants and Agriculture

5.6.12 The Council will be undertaking a targeted 'call for employment sites' to ensure that it has fully explored all employment site options and that there is sufficient quantum of land of good / high quality in the right locations to meet the 60ha requirement. A detailed assessment of the employment land supply portfolio will be undertaken as part 2 of the ENALR. This assessment will confirm the sites put forward to meet the employment land requirement are fit for purpose, will endure for the plan period and secure the right opportunities for new investment and sustained economic growth.

5.6.13 Based upon the detailed analysis from the ENALR and supporting strategies, Policy EC2 provides policy directions on the overall scale and strategic locations for employment land provision.

Policy EC2: Employment Land, Jobs and Skills Supporting Requirements ~~Business and Job Creation~~

A. The Council will support the delivery of at least 1,600 new jobs annually in the per annum to 2037 within the District in the period to 2030 through: and a minimum of 60ha of allocated employment land through the Allocations DPD.

~~A. Planning for the supply of at least 135 ha of developable employment land over the Local Plan period by allocating a range of sites for general employment purposes. Such land allocated for employment purposes will not be granted permission for alternative uses.~~

B. The future strategic locations and employment distributions, and priority sectors for future economic growth are as follows:

Regional City of Bradford (40ha)

Airedale (15ha)

Wharfedale (5ha)

Priority Sectors:

Bradford - Retail, Finance and Professional Services, Public Services, Food Production, and Creative & Cultural Industries including Media.

Bradford South - Manufacturing, Distribution and Specialist Construction

Airedale - Manufacturing, Logistics, Professional and Financial Services and Media

Wharfedale - Health, Digital and Professional Services

Pennine Towns and Villages - Health, Hotels/Restaurants and Agriculture

B.C. The Council will work with partners to accelerate economic growth through implementing major regeneration initiatives and proposals across the District, C.S supporting and improving the vitality and viability of the City Centre and ~~lower-order~~ town, and district and local centres and the development of skilled and flexible communities and workforce in order to underpin future economic growth to deliver the Bradford Economic Growth Strategy.

D. Development proposals above the thresholds identified in Policy EC3 should seek to support employment, skills development, apprenticeships and other training and education opportunities, in both the construction and end-use phases, including through Section 106 obligations where appropriate.

E. The council will support development which relates to the operational needs of and/or expansion of all of the District's higher, further and specialist education establishments including the University of Bradford and Bradford College. Ancillary and related uses will also be supported providing it can be demonstrated that such uses are:

- a. genuinely linked to the education establishment and its operations;
- b. in locations where they are compatible with the surrounding land uses;
- c. in accessible locations which minimise the need to travel;
- d. where it does not conflict with the plan's town centre policies or other relevant policies.
- e. Where appropriate any new or proposed extensions to existing campuses should be guided by a comprehensive, up to date strategy and masterplan.

5.7 Reasonable Alternatives

- 5.7.1 No other reasonable alternatives identified - the policy has been informed by an updated evidence base.

Consultation Question 18

Preferred Option:

Policy EC2: Employment Land, Jobs and Skills Requirements

Significant redrafting and refocusing of the policy to consider new employment land requirements, priority sectors and focus upon engraining local skills and training development opportunities.

Q18. Please provide your comments for Policy EC2 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.8 Preferred Option: Policy EC3: Employment and Skills Delivery

- 5.8.1 Policy EC3 establishes a planning framework to deliver the strategic objectives set out in Policies EC1, EC2 and contributes to Strategic Core Policies through the management of growth, helping to transform economic and environmental conditions across the District, particularly by identifying economic growth areas and initiatives.
- 5.8.2 The policy is also reflective of national planning policy to build a strong and competitive economy, as it establishes criteria and identifies strategic sites for local and inward investment and to meet anticipated needs over the plan period. Policy EC3 is also considered flexible enough to provide sufficient direction to the Allocations DPD and also respond to windfall opportunities as they arise. The policy also reflects the requirements of Paragraph 82 of the NPPF by recognising and addressing the specific locational requirements of different sectors by establishing geographical priority areas for B1(a), B1(b), B2 and B8.
- 5.8.3 Policy EC3 looks to address skills shortage within the working age population, and the high levels of economic inactivity. Securing employment, training and enterprise opportunities is central to the council delivering Leeds City Region, West Yorkshire Combined Authority and the council's own objectives for supporting a skilled and flexible workforce. The Leeds City Region Employment and Skills Plan 2016 – 2020 outlines that “skilled people, better jobs” is one of the four key priorities set out in the Leeds City Region Strategic Economic Plan. It further sets out how partners will work together to deliver high levels of prosperity, jobs and quality of life for everyone.

- 5.8.4 Approximately 14% of the working age population in Bradford currently have no qualifications, which is nearly double the national average, and the NVQ 1,2,3 and 4 attainment levels in the District are significantly lower than regional and national average. In an effort to ensure the Bradford workforce is trained to an appropriate standard to exploit the economic growth aspirations for the District over the next 15 – 20 years, Policy EC3 establishes criteria for providing opportunities resulting from new development proposals.
- 5.8.5 The policy provides a clear steer that development proposals should address these issues and suggests some measures which could be used to achieve this. The council recognises that there may be larger organisations and construction businesses that already run their own programmes for example existing apprenticeship schemes. In these cases, the Council would wish to discuss these initiatives further to help shape or enhance them to achieve the objectives set out in this policy.
- 5.8.6 Policy EC3 will be updated for the Regulation 19 publication following completion of the ENALR (Stage 2) work programme, which evaluates employment site options to help inform the Allocation DPD and any new sites identified following the focused call for sites.

Policy EC3: Employment ~~Land Requirement~~ and Skills Delivery

~~A. The planned requirement for at least 135 ha of employment land within the District will be distributed between the different parts of the District as follows:~~

- ~~1. 100 ha within City of Bradford~~
- ~~2. 30 ha in the Airedale Corridor~~
- ~~3. 5 ha in the Wharfedale Corridor~~

The strategic economic growth priorities set out within Policy EC2 will be delivered by:

A. Bradford City Centre as the primary focus for the development of new office B1(a) floorspace within the District. Planning applications for more than 1,500 sq.m of B1(a) floorspace on sites outside Bradford City Centre will need to provide evidence that demonstrates why the development cannot occur within City Centre.

B. The Regional City of Bradford and Airedale shall be the primary focus for the development of new B2 (General Industrial) and B8 (Storage or Distribution) floorspace within the District.

C. B1b uses will be encouraged within the City Centre, Education Campuses, Business Development Zones, Enterprise Zones and Strategic Economic Sites⁷.

D. The required employment land to be identified in the aAllocations DPD will be met from the following sources:

- ~~1. Unimplemented but d~~Deliverable carried forward employment sites and extensions to existing sites allocated within the RUDP;
2. Other committed sites with planning permission for employment use;
3. Sites already identified in existing regeneration strategies; ~~for Bradford City Centre and Airedale.~~
4. Sites identified in current adopted Area Action Plans and emerging masterplans, including that for the Shipley and Canal Road Corridor (including Manningham), City Plan for Bradford City Centre and the Leeds Bradford Corridor.
5. New Sites which are considered suitable for employment use.

~~C.~~ D. The Allocations DPD will examine the need for Green Belt deletions to provide high quality employment locations in the following broad areas of search:

1. Within North Bradford tied to the locational benefits of proximity to Leeds Bradford International Airport and Apperley Bridge Station.
2. Within South East Bradford
3. East and North East of Keighley
4. Ilkley and wider Wharfedale corridor

E. The Council will seek to secure an agreed training, skills development, education, apprenticeship or related programme through a s.106 agreement with applicants where the proposed development meets the following thresholds:

1. 3,500 sqm. or more of business or industrial floorspace; or
2. housing developments which would deliver 60 dwellings or more.

In instances where the development does not trigger one of the above thresholds then wherever feasible the Council will seek to secure alternative education or training programmes with the applicant to contribute to skills development.

⁷ Strategic Employment Sites - Employment sites which are considered of a strategic scale and likely to deliver over the medium and long term.

5.9 Reasonable Alternatives

5.9.1 Reasonable alternatives considered include:

- Reducing the scale of the policy to focus upon as more narrow range of issues – would not provide a comprehensive overview
- Combining policy EC3 with EC2 – policy may be difficult to follow.

Consultation Question: 19

Preferred Option:

Policy EC3: Employment and Skills Delivery

Policy has been subject to significant redrafting to more clearly focus upon policy delivery, identifies key areas of employment space and skills.

Q19. Please provide your comments for Policy EC3 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

POLICY EC4: Sustainable Economic Growth – NOT UNDER REVIEW

5.10 Preferred Option: Policy EC5: City, Town, District and Local Centres

5.10.1 The role and performance of the City, District, Town and Local Centres is important to a prosperous District. Town centres are at the heart of their communities and are a focus for economic activity including retail, leisure, residential and community provision with accessible public transport connections. The following policy sets out the network and hierarchy of centres and the role each will play including the type and scales of development appropriate in each centre. Policy EC5 delivers on Core Strategy Spatial Objective 6, 7 and 10.

5.10.2 In line with the National Planning Policy Framework (NPPF) paragraph 85 - 90, Policy EC5 seeks to ensure the continued vitality of town centres beyond just retail. The policy defines a hierarchy of centres and sets local threshold when assessing the impact of planning application for retail and leisure uses in edge of centre or out of centre locations. The NPPF was updated in 2019, one key update was the removal of the need to apply an impact assessment for offices in edge of centre or out of centre locations, although they are still subject to sequential tests. Another

key update in the NPPF was the quantifying of 'edge of centre' locations within Annex 2 of the framework, which is now: any location up to 300 metres from the Primary Shopping Area for retail proposals, 500 metres from the centre boundary for office proposals, and 300 metres from the centre boundary for all other main town centre use proposals.

- 5.10.3 Continued regeneration of existing city and town centres across Bradford District is a Council priority as highlighted in the Bradford District Plan 2016-2020. Policy EC5 will therefore support town centre regeneration programmes in order to create a prosperous district.
- 5.10.4 The Council is currently in the process of producing a Bradford District Retail & Leisure Study (2019) in order to assess the vitality and viability of existing centres and assess the capacity and need for additional retail and commercial leisure (cinema, bingo, bowling sectors only) floor space. The 2019 study provides an update to that of the 2013 study, which underpinned the Core Strategy adopted in 2017. The Bradford District Retail & Leisure Study (2019) has provided the evidence base for the revised Policy EC5.
- 5.10.5 The Council will continue to assess the retail needs and capacity of the District and will take a proactive approach in relation to any future opportunities that may arise for new comparison and convenience retail developments, based on the location of such proposals, and the qualitative and economic benefits which occur from development.
- 5.10.6 The Council recognises that there is scope to diversify the city and town centres and improve the evening economy through the promotion and enhancement of leisure and cultural facilities which will complement the role and function of city and town centres. There are opportunities to improve the quality and the range of restaurants, bars, public houses and evening entertainment uses within the city and town centres.
- 5.10.7 The Council will continue to assess the commercial leisure needs and capacity of the District and will take a proactive approach in relation to any opportunities that may arise for commercial leisure developments, based on the location of such proposals, and the qualitative and economic benefits which occur from development.
- 5.10.8 Policy EC5 links to Strategic Core Policy 1 and 4, BD1, AD1, WD1, PN1 and will enhance the role and function of existing and proposed new centres within the City of Bradford, Airedale and Wharfedale and South Pennines. Policy EC5 will ensure that the city centre and principal town centres have a competitive role and function within the Bradford and wider LCR economy in support of EC1.

Policy EC5: City, Town, District and Local Centres

Planning decisions, plans, town centre strategies, investment decisions and programmes should seek to sustain and enhance the vitality and viability of a

network and hierarchy of centres in the Bradford District (Figure EC1) by ensuring that new, appropriate scale of retail, leisure and office development is encouraged in sequentially preferable locations. Allocations, designations and associated development management policies on centre boundaries, primary shopping areas, primary and secondary shop frontages and sites (expansion areas) to meet at least the first five years of identified need will be determined by the Allocations DPD, Bradford City Centre Area Action Plan DPD and the Shipley and Canal Road Corridor Area Action Plan DPD.

A. Bradford City Centre should be the focus for a wide diversity of economic activity, including significant offices, residential, convenience and comparison retail including the traditional (and specialist) markets, leisure, entertainment, arts, culture, tourism, intensive sports and recreation uses and the priority centre for promotional events and activities.

B. Keighley, Ilkley, Bingley and Shipley Town Centres should be the focus for office, residential, convenience and comparison retail, including the traditional (and specialist) markets, leisure, entertainment, arts, culture and tourism, intensive sports and recreation uses that are appropriate to the centres, provided proposals do not have a significant adverse impact upon the vitality and viability of Bradford City Centre and other nearby Town Centres.

C. The District Centres of Five Lane Ends, Girlington, Great Horton, Greengates, Thornbury, Tong Street, ~~Odsal~~, should be the focus for convenience retail and limited comparison retail and a range of non retail services such as banks, building societies, restaurants, cafes and local public facilities in order to enable people to meet their day to day needs and minimise their need to travel, provided proposals do not have a significant adverse impact upon the vitality and viability of Bradford City Centre and other nearby Town Centres.

D. The following 46 Local Centres within urban areas and villages should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people's day to day needs and minimise their need to travel.

Addingham, Allerton, Baildon, Barkerend Road, Bolton Junction, Burley-in-Wharfedale, Carlisle Road/Whetley Hill, Clayton, Cottingley, Crossflatts, Cross Roads (Keighley), Cullingworth, Denholme, Duckworth Lane, Eccleshill, Fell Lane/Oakworth Road (Keighley), Frizinghall, Harden, Haworth (Main Street), Haworth (Mill Hey), Heaton, Holme Wood, Horton Grange, Idle, Laisterdyke, Leeds Road, Lidget Green, Low Moor, Marshfields (Manchester Road), Menston, Oak Lane (Manningham), Oakworth, Princeville, Queensbury, Riddlesden, Saltaire, Silsden, Steeton with Eastburn, Sticker Lane, Thornton, Undercliffe, White Abbey Road, Wibsey, Wilsden, Wrose, Wyke.

E. A new Local Centre will also be required as part of the Holmes Wood Sustainable Urban Extension.

1. The sequential test will apply to all planning applications for main town centre uses ~~that~~ which are neither in an existing centre nor in accordance with ~~are not in an existing centre and are not in accordance with~~ the Development Plan Documents. Main town centre uses (as defined in NPPF Annex 2) should be located in centres, then in edge of centre locations and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference will be given to accessible sites that are well connected to the centre. Applicants and the Council ~~will~~ should demonstrate flexibility on issues such as format and scale. The sequential test will not be applied to applications for small scale rural offices or other small scale rural development.

2. When assessing applications for retail, ~~office~~ and leisure development not in accordance with the Development Plan Documents and in an edge of centre or out of centre location, the Council will require an impact assessment if development is over:

1. 1,500 square metres gross ~~of~~ floorspace for Bradford city centre.
2. 1,000 square metres gross ~~of~~ floorspace for Keighley, Shipley, Bingley, Ilkley.
3. 500 square metres gross ~~of~~ floorspace for District Centres.
4. 200 square metres gross ~~of~~ floorspace for Local Centres.

This should include assessment of:

- i) The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal, ~~or on the role of centres;~~ and
- ii) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider ~~area~~ retail catchment (as applicable to the scale and nature of the scheme), ~~up to five years from the time the application is made. For major schemes where the full impact will not be realized in five years, the impact should also be assessed up to ten years from the time the application is made.~~

Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above ~~factors~~ considerations, it should be refused. It is for the applicant to demonstrate compliance with the sequential test and/or impact test. Failure to undertake a sequential assessment and/or impact assessment could in itself constitute a reason for refusing permission. The sequential test and impact test should be

undertaken in a proportionate and locally appropriate way, drawing on and sharing existing information where possible. The applicants and the Council should seek to agree the scope, key impacts for assessment, potential suitability of alternative sites and level of detail required in advance of applications being submitted.

G. Retail development will only be permitted outside of the Primary Shopping Areas as defined in the Allocations DPD, Bradford City Centre AAP and Shipley Canal Road Corridor AAP if the following criteria are satisfied:

1. The proposed development is of an appropriate scale;
2. There are no alternative central sites within the primary shopping areas which are suitable, ~~viable or~~ and available, with preference then given to expansion areas, edge of centre sites before out-of-centre sites are then considered.
3. The proposed development will not have a significant adverse impact on the vitality and viability of existing Town, District and Local Centres; and
4. The proposed development is accessible to all modes of transport, especially public transport.

H. Proposals for ~~leisure~~, office and other main town centre uses will only be permitted on sites outside the city, town and district centre boundaries (as defined in the Allocations DPD, Bradford City Centre AAP, Shipley & Canal Road Corridor AAP) if:

1. The scale of the proposed development is of an appropriate scale;
2. There are no alternative central sites within the city, town or district centre boundaries which are suitable, ~~viable or~~ and available, with preference then given to expansion areas, then edge of centre sites, before out-of-centre site are then considered;
3. ~~The~~ In the case of main town centre uses, it will not have a significant adverse impact on the vitality and viability of any existing city, town or district centre;
4. The proposed development is accessible to all modes of transport, especially public transport;
5. The proposed development would not result in unacceptable highway impacts;
6. The development would not undermine the economic development strategy of the Core Strategy DPD.

I. Small Shop Units (under 150 square metres gross of floor space) within walking distance of most residential properties will be permitted, provided that the development will not lead to the creation of a shop or group of small shops which collectively would have a significant adverse impact on the vitality and viability of the network and hierarchy of City, Town, District and Local Centres.

J. Office, residential uses, community and cultural facilities and services at ground and upper floor levels within the above centres will be encouraged, provided they do not have a significant adverse impact on the retail function of the Primary Shopping Area.

K. Healthcare services and educational facilities at ground and upper floor levels within the above centres will be encouraged, provided they do not have a significant adverse impact on the retail function of the Primary Shopping Area.

L. Development, environmental enhancements, accessibility improvements, town centre management strategies and promotional events and activities should take place in each of the centres within the District to create distinctive, attractive and vibrant sense of place and identity to be enjoyed and used by all. Priority will be given to worst performing centres as identified and monitored by the Council through the Bradford District Retail & Leisure Study.

5.11 Reasonable Alternatives

- 5.11.1 No reasonable alternatives considered – changes align to updated evidence and national policy changes.

Consultation Question 20

Preferred Option:

Policy EC5 City, Town, District and Local Centres

Minor changes to policy aligned to updated evidence base and national policy changes.

Q20. Please provide your comments for Policy EC5 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

SECTION 5

Thematic Policies: Transport & Movement



Section 5: Transport and Movement

5.12 About

5.12.1 The Transport and Movement Policies contained in this Plan have been influenced only by the spatial, economic and social considerations set out within the relevant chapters of Core Strategy and forthcoming Site Allocations DPD. The policies have also taken full consideration and align closely with all relevant national, regional, sub-regional and local transport policy and strategy.

5.12.2. The West Yorkshire Transport Strategy 2040, which was adopted in August 2017, identifies that transport investment in the Leeds City Region is vital to facilitate economic growth, helping to put in place the underlying conditions for economic competitiveness, and to meet increasing demand for travel that will stem from future growth. The Strategy aims to support the current economic and social roles and functions of key locations in the City Region, and to help stimulate and accommodate planned development and change.

5.12.3 The Yorkshire Transport Strategy 2040 identifies three key transport objectives:

1. **Economy** - Create a more reliable, less congested, better connected transport network
2. **Environment** - Have a positive impact on our built and natural environment
3. **People and Place** - Put people first to create a strong sense of place

The Council has also been clear in its support for Northern Powerhouse Rail and integrated MASS transit projects as part of its long-range strategic transport planning and improving the overall connectiveness of Bradford within the wider Leeds city region and beyond.

5.12.4 An efficient and effective transport system supporting the key principles of connectivity, accessibility and sustainability is vital to delivering the overall Spatial vision. Delivery of the Local Plan will perform a vital role in helping to achieve the strategy and objectives set out above.

5.13 What you told us

5.13.1 The initial scope of the CSPR did not consider a review of the policies contained within the Transport and Movement Chapter. There are however a number of comments relating to the transport related issues as part of the scoping consultation and these have been considered as part of drafting the Preferred Options report. The key issues raised included:

Air Quality – Comments received raised concerns regarding the poor levels of air quality across Bradford’s highways network and the need to address this through

the revised policy framework. Concerns were also related to decreased air quality as a result of further housing and employment related development due to increases in car and HGV movements.

Lack of investment – Comments received raised the issue of heavy congestion across key routes on the highways network, much of which relates to a lack of investment in road infrastructure. Many issues were raised in regards of existing levels under investment and the resulting congestion and how this will become increasingly worse with the level of growth planned for through the Core Strategy. Many comments suggested the need to cut car use and move towards increasing priority for public transport.

Public Transport Provision – Many of the comments received related to the need to invest further in the public transport network. Concerns regarding the transport network appear to centre on that the network does not appear to be very efficient or work effectively for its users. Comments also raised the issue of public transport not being a viable alternative to private car travel, especially when the level of cheap car parking in places like the City Centre are taken into consideration.

Walking and Cycling – The majority of the comments received relating to transport and movement supported increases in the quantity and quality of walking and cycling routes across the District. Many comments raised the need to make walking and cycling a more viable choice by integrating cycle and pedestrian usage into new development including; cycle storage, changing facilities, and ensuring that cars do not dominate the built environment.

Car Parking – Comments received on this issue were mixed, with a split between decreasing levels of car parking to encourage more public transport and active travel modes, but others suggesting better levels of parking to support businesses within the city and town centres.

5.14 Findings and Policy Directions

- 5.14.1 The transport network in the urban area of Bradford City is strongly characterised by a radial pattern of routes leading to the city centre, though there is also an outer and an inner ring road. The main routes to the north of the District follow or link Airedale and Wharfedale and there is also an important network of routes serving Keighley and smaller settlements to the west of the District. There are over 1900km of roads in Bradford District, which it is the responsibility of the Council to maintain. Many of the key routes in the District are congested at peak times with some also suffering congestion in the off-peak periods.
- 5.14.2 There is also an extensive public transport network across the District including a well-used local rail system serving Airedale and Wharfedale and directly linking to Leeds, Calderdale and Greater Manchester. At peak times there is overcrowding on some rail services and the quality of the rolling stock on the Calder Valley line is poor. There is also a high level of bus use throughout the urban area which is

encouraged by a generally good quality and high frequency network, though in common with other parts of West Yorkshire bus use has been declining in recent years and there have been some service cuts that have further discouraged the use of buses for travel.

- 5.14.3 Bradford District suffers from poor air quality in some areas as a result of traffic and congestion. The Transportation and Movement policies within this section complement Policy EN8 on Environmental Protection and Air Quality and will help to address the negative impacts that Transport has on the environment and public health through emissions.
- 5.14.4 Within the above context, economic growth in the District, a growing population and the consequential need for more housing will significantly affect travel patterns. This will likely lead to increased demands on the transport network and increases in congestion from future road traffic growth if increases in car use and road freight are not managed through appropriate policies and interventions.
- 5.14.5 The Core Strategy provides an integrated strategy for providing development in optimum locations which aim to reduce the number and length of car and freight journeys and maximise opportunities for the use of sustainable modes of transport. This will assist in reducing the negative impact of transport on the environment and positively contribute to quality of life. As well as addressing connectivity and transport issues within the District the Local Plan also needs to ensure that connections between Bradford District and the rest of Leeds City Region, National and International locations are maintained and strengthened, supporting Bradford's economic growth. In this respect it will be important to maintain and improve strategic road and rail links, particularly those to Leeds, Leeds Bradford International Airport (LBI) and to the Manchester City Region area including Manchester International Airport.
- 5.14.6 The emerging Bradford District Transport Strategy identifies a range of priorities to improve connectivity on a local, regional, pan-regional and national level. These priorities and associated guidance will provide a framework for WYCA, the LEP and the West Yorkshire District Councils in making investment decisions and taking action to improve transport:

Road Network: A road network that enables efficient movement of people and goods, which balances the competing demands for road space and tackles air quality and emissions related to road transport.

Connections and Accessibility: To make our communities highly accessible locations for all forms of sustainable and active travel; and integrate the transport network to ensure it become part of the place rather than a barrier and helps people live healthy lives.

Public Transport: A MASS transit systems that transforms public transport network in Bradford and connects different modes of travel into one network; and allows to effective access to a new Bradford City Centre Northern Powerhouse Rail station for high speed train travel access to Leeds, Manchester and London.

Communications and Technology: To use technology to better plan and manage the transport system and improve the experience of the people using it; and deliver a cutting edge communications network which reduces the need to travel;

Management and Resilience: To ensure that we make the best use of our existing and future transport assets and that they are fit for the future and properly managed in a sustainable, environmentally friendly and cost effective way; and ensure the transport network is operating in effective and efficient way to allow for the sustainable deliver of future housing and economic growth aspirations.

- 5.14.7 The following Policies provide the strategy to shape the future of transportation within Bradford District and connections to areas beyond the District boundary. Additional guidance and policies can be found in the individual chapters on Economy, Housing, Centres and also those relating to the individual areas of the District. Further guidance will also feature in any future Development Plan Documents produced as part of the Local Plan.

5.15 Preferred Option: Policy TR1: Travel Reduction and Modal Shift

- 5.15.1 Addressing traffic growth and congestion is a major issue for the District. A key aim of integrated land use and transport planning policies is to reduce the need to travel and to reduce the length and number of journeys, particularly those made by private car and road freight. The Core Strategy includes a number of complementary policies to attract more journeys by foot, bicycle and onto public transport, encourage developments in locations well-served by public transport or close to a range of services; and introduce measures aimed at achieving a shift away from private vehicle use. Policy TR1 covers the specific contribution that transport planning makes to effect modal shift and travel reduction. This policy is linked to and dependent on the application of the subsequent policies around demand management and network management and enhancements.
- 5.15.2 The level of housing growth proposed in Policy HO1 and the level of potential job growth set out in Policy EC2 will inevitably add to pressures on the District's transport network. Without appropriate policy interventions, the highway network will become further congested and economic growth will be stifled. Whilst selective increases in vehicle capacity have a role to play in addressing these pressures, it is not possible, for a variety of reasons, including the adverse environmental and air quality impact, and resource constraints, to attempt to solve congestion problems solely by increasing highway capacity. For this reason, the locational guidance in policy TR1 and the pursuit of stronger demand management as the economy recovers will be critical to the successful integration of land use and transport planning strategies.
- 5.15.3 Greater use of walking and cycling as modes of transport, particularly over short distances, requires encouragement and investment. These short but vital links in a journey can often influence the principal modal choice. The wider health benefits of

these modes need to be strongly promoted, whilst the issues of road safety and security also need to be addressed, as concerns relating to personal safety can act as a major deterrent. The provision of well-designed spaces for pedestrians and cyclists should be supported through the planning system.

- 5.15.4 Transport assessments/statements and travel plans should be produced for all new build developments and change of use developments that would lead to a potential increase in trips or changes in travel movements. These should be prepared to Government best practice guideline standards current at time of submission, which would include a range of measures to encourage use of sustainable travel modes. The development, implementation and enforcement of travel plans are an essential component of the process of determining planning applications.
- 5.15.5 Local authorities already have a range of powers to effect demand management, including extensive powers to control allocation of space on the highway (e.g. bus-only lanes, high-occupancy vehicle lanes and cycle lanes) control public parking provision (including park and ride schemes) and introduce local charging schemes or workplace parking levies, with ring fencing of revenues for transport improvements. Policy TR1 sets out a variety of potential demand management mechanisms to encourage travel reduction and modal shift. These measures will be investigated where appropriate within the context of the Local Plan development proposals. A further important consideration is the encouragement of the take up of alternative fuels and a key element of this is the provision of charging facilities and other infrastructure which will provide confidence for drivers to invest in more sustainable vehicles.

Policy TR1: Travel Reduction and Modal Shift

The Council through planning and development decisions and transport policies will aim to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, support the development of healthy streets, limit traffic growth, reduce congestion and air pollution and improve journey time reliability.

The Council will support the delivery these strategic transport priorities through application of the following criteria:

A. Development to be appropriately located to ensure that the need to travel is reduced, the use of sustainable travel is maximised, and the impact of development on the existing transport networks is minimal. ~~(Allocation DPD, Area Action Plan DPDs, and individual planning applications, will be informed by government policy and public transport Accessibility Standards in Appendix 3 and be accompanied by Transport Assessments and Travel Plans).~~

B. The Council will seek to manage and improve the ~~effective and efficient management of the~~ existing ~~transport networks (strategic and local highway, rail, bus, and cycle and walking networks routes~~ to address

congestion, improve air quality and encourage modal shift to sustainable transport modes. This will include prioritisation of appropriate sustainable transport modes on the highway, through measures such as HOV lanes, bus priority and cycle lanes.

C. Influence travel behaviour through the requirement for all major new build and change of use developments (~~above thresholds set out in the latest DfT guidance~~) which ~~lead to a potential increase in movements~~ to provide an approved travel plan, transport assessment and statement and ~~Travel Plan~~ in accordance with the NPPF / PPG.

D. Travel ~~d~~Demand (~~particularly single occupancy car use~~) will be managed through application of parking policies (TR3), and the use of existing powers to explore innovative demand management measures, where local conditions are appropriate, in conjunction with the introduction of air quality improvement programmes, sustainable travel initiatives and enhancements.

E. Identify, protect and develop appropriate facilities and high-quality quality accessible walking, cycling and public rights of way infrastructure ~~for active travel modes (walking, cycling and horse riding). Including identified~~ strategic and local routes and networks and as well as local routes and links where opportunities arise, linkages with into national and regional routes. All major development proposals will be required to provide appropriate facilities and levels of for active travel modes at new developments, including but not exclusively cycle parking, and changing facilities as set out in Appendix 3 along with safe and attractive routes within developments.

F. In an effort to reduce transport related greenhouse gas emissions and improve air quality, the Council will support the provision of appropriate charging infrastructure relating to electric and hybrid fueled vehicles. A key factor in encouraging the wider take up of alternative fuels, technologies and vehicle ownership and use models is the implementation of the associated recharging, refuelling and other infrastructure. Proposals to implement such infrastructure, for example Electric Vehicle (EV) charging points, through the development process will be explored and supported where viable. All major developments and car parks will also be required to deliver appropriate types and levels of electric vehicle points, as per detailed guidance in Appendix 3.

G. Support the provision of infrastructure and Encourage development that reduces travel needs through the promotion of home working and live/work.

H. Support opportunities that deliver more sustainable streets which make it easier to participate in walking and cycling, improve social interaction, integrate green infrastructure and support area regeneration and local

5.16 Reasonable Alternatives

- 5.16.1 Reasonable alternative identified – less extensive changes and more compact policy – may not provide a comprehensive overview of issue expected within a key anchor policy. The retention of the existing TR1 policy is not selected as it is considered out of date and no longer aligns with latest corporate economic strategy (West Yorkshire Transport Strategy 2040, TFN Transport Plan and emerging Bradford Transport Strategy 2040) and does not address more fully air quality issues.

Consultation Question 21

Preferred Option: Policy TR1: Travel Reduction and Modal Shift

General update to the policy to include a clearer focus and prioritisation upon public transport, cycling, walking and reducing air pollution.

Q21. Please provide your comments for Policy TR1 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.17 Preferred Option: Policy TR2: Parking Policy

- 5.17.1 Parking strategies are a key element in the suite of measures the Council can use to effect modal shift and manage demand. The availability of car parking can be a major influence on travel choices, and the Core Strategy has an important role to play in ensuring parking policies across the District support the wider spatial strategy of effecting a change to sustainable travel modes. In developing demand management and parking strategies, including car parking standards, there has been a need for the Council to do so in manner consistent with neighbouring authorities, in order to avoid undermining their policies.
- 5.17.2 Parking standards to be applied to all forms of development proposals are set out within Appendix 3 and will be used in the Local Plan, as indicative parking standards allowing flexibility in how the parking standards are employed to maximise sustainable travel. These parking standards cover requirements for a number of transport modes including car, freight, cycling and electric vehicles charging infrastructure.
- 5.17.3 A number of transport bodies (Network Rail and rail franchise operators) also operate car parks in the form of Park and Ride sites across the District, and these

will be managed and enhanced to complement the approach of the Local Plan, West Yorkshire Transport Strategy 2040 and the Bradford Air Quality Plan. Park and Ride, Park and Cycle, Park and Stride sites have the potential to complement local parking policies.

5.17.4 In effort to reduce the requirement for car parking within major new developments, the Council will encourage users to travel by more sustainable modes of travel. This shall be pursued through a range of mechanisms, including:

- maximising development within urban brownfield locations at high densities, which benefit from high accessibility to high frequency public transport provision;
- supporting the provision of a high-quality green infrastructure to create a network of cycle and walking routes to make active travel viable, attractive and the norm as an alternative to car use; and health and wellbeing initiatives informed by behavioural insights to raise awareness of the health benefits of active travel and support to make the change, and
- prioritising sustainable transport corridors, which reduce journey times and user experience for those travelling by public transport, low emission vehicles, cycling and walking and aid in reducing greenhouse gases and improvement area quality.

5.17.5 Where it is demonstrated car parking provision is necessary within new developments, it is important that it is at appropriate levels, supports the overall quality of the area and does not detract away from the character and quality of street scenes. Overprovision and poorly designed new car parking arrangements can dominate street scenes and make for poor pedestrian environments. Large surface car parks and buildings set back behind driveways should be avoided. More appropriate and innovative solutions can involve minimising the levels of new car parking, and the provision of below buildings parking, courtyards and on-street parking.

Policy TR2: Parking Policy

The Council ~~through planning and development decisions and transport policies~~ will seek to manage car parking to help manage travel demand in an effort to support the use of sustainable travel modes, ~~meet the needs of disabled and other groups whilst improving~~ improve accessibility for all and the quality of place. These to include the following mechanisms:

A. The assessment of new developments against indicative car, cycle, freight and electric vehicle parking standards contained in ~~Appendix 4~~ Appendix 3.

B. A progressive reduction in temporary and long stay parking in town centres and other highly accessible locations (other than at railway stations

to serve rail users and at other locations serving a park and ride function) ~~and transfer of some parking spaces to short stay, subject to consideration of possible implications for traffic congestion.~~

C. A reduction of on-street parking by the use of on-street parking controls in town centres and other highly accessible locations, to maximise a move to sustainable travel modes in conjunction with provision of high-quality public transport, walking and cycling networks and environmental improvements.

D. Support the delivery of park and ride facilities and infrastructure, including road and public transport network improvements to increase capacity and journey times.

~~D. Provision of rail and bus based park and ride facilities (including necessary bus priority measures to achieve journey time savings) will be appropriate where they are financially viable, support the use of public transport and help reduce congestion (and where on the rail network do not add to existing capacity problems).~~

E. Consideration of charges on non-residential parking where this is done in conjunction with the application of other measures to encourage people to switch to more sustainable modes.

F. Improve the quality of parking in the city and town centres for shoppers and other short stay uses so that it is convenient, safe and secure. Parking charges that are appropriate, related to demand, and that do not undermine the vitality of town centres with differential pricing being used to discourage all-day parking. Support the introduction of appropriate electric vehicle charging infrastructure. Associated proportionate parking enforcement will be undertaken to ensure the effectiveness of the Policy.

G. Require new developments to take a design led approach to parking which is well integrated within the overall layout so that it is inclusive and accessible to all users, supports the efficient use of land, is proportional to the type, mix and use of the development, integrates electric vehicle charging infrastructure, does not discourage the use of more sustainable modes of transport and is designed in consideration of the street scene and local character, and creates a safe and pleasant environment even in parking areas.

5.18 Reasonable Alternatives

- 5.18.1 Reasonable alternative identified – less extensive changes and more compact policy – Existing TR2 policy considered out of date and no longer aligns with latest corporate transport strategy (West Yorkshire Transport Strategy, TFN Transport Plan, and the emerging Bradford Transport Strategy 2040) to increase levels of active travel by integrating cycle parking and facilities in new development and encouraging the use of electric vehicles through the integration of charging points in developments.

Consultation Question 22

Preferred Option: Policy TR2: Car Parking Policy

Policy updated to increase levels of active travel by integrating cycle parking and facilities in new development and encouraging the use of electric vehicles through the integration of charging points in developments.

Q22. Please provide your comments for Policy TR2 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.19 Preferred Option: Policy TR3: Integrating Sustainable Transport and Development

- 5.19.1 Strengthening the integration of sustainable transport into new developments is essential delivery of the Local Plan and to address existing problems of congestion and accessibility. This could include improvements to capacity, quality and/or journey time reliability. For many people the private car will remain the main feasible means of transport in the more remote parts of the District until public transport can be improved in terms of price, availability, frequency, accessibility and reliability. Improvements to walking and cycling routes and networks are also required to enable shorter journeys to be made by these modes and facilitate high quality multi modal interchange opportunities. This will enable these sustainable modes of transport to become a realistic and viable alternative to everyone's travel needs.
- 5.19.2 Planned enhancements to public transport, cycling and walking infrastructure are set out in the West Yorkshire Transport Strategy 2040, emerging Bradford Transport Strategy 2040, as well as in the Local Infrastructure Plan and Bradford's Cycling Strategy. Localised improvements will also be sought through the planning

application process, through the design and layout and of high-quality developments as set out in policy TR3 below.

- 5.19.3 The sustainable transport framework for all new developments set out in Policy TR3 is complemented by accessibility criteria in Appendix 2 that define the levels of public transport accessibility needed to support sustainable development across the District; and is also supplemented by Policy TR2 and the supporting standards within Appendix 3. The overall aim of the framework is to strengthen and clarify the integration of sustainable transport and all future development. The transport accessibility criteria will be used to prepare the Allocations DPD, the Area Action Plan DPDs, the Local Infrastructure Plan and emerging Bradford Transport Strategy 2040, in order to identify highly accessible locations for development along with mitigation measures required to enable sustainable development. The framework set out in Policy TR3 will also be used in the assessment of all planning applications to ensure future proposals maximise the use of sustainable transport modes.

Policy TR3: ~~Public Transport, Cycling and Walking~~ Integrating Sustainable Transport and Development

The Council ~~through planning and development decisions and transport policies will safeguard and improve public transport, walking and cycling infrastructure and services through the following measures~~ will promote sustainable travel in new developments arising through the Allocations DPD and planning applications by supporting the following mechanisms:

A. The application of ~~The~~ accessibility standards, ~~(as set out in Appendix 3) Appendix 2 along with the key transport networks for highway and bus (as identified in LTP 3 Appendix C) and the rail network,~~ will be used to guide the allocation and phasing of development sites ~~in Allocations DPD and the Area Action Plans DPD~~ the Local Plan and development proposals for windfall development.

B. Development proposals through the allocation of land through the local plan and development proposals for windfall development should ~~support the enhancement of~~ maximise the use of walking, cycling and public transport ~~and services where viable and necessary~~ as primary means of transportation.

~~C. Public Transport provision should be improved throughout the District in line with the priorities set out in LTP3, Railplan 7 and the Leeds City Region Transport Strategy, along with other priorities that are approved by the relevant governance processes throughout the plan period. The following mechanisms should be considered along with others that may be relevant to local circumstances:~~

~~1. quality bus corridors~~

~~2. improvements to rail capacity and operation~~

3. park and ride

4. improved access to Leeds Bradford International Airport and Manchester International Airport

5. Innovative and smart ticketing and information provision

D. Opportunities for innovation and improvements to the rail networks, in line with Rail Plan 7, should be supported, whilst acknowledging the limited capacity on the network, cost, external factors and long lead in times.

C. Development should support and contribute to appropriate levels of enhancement to all transport networks, including public transport, cycling and walking, and highways infrastructure and services.

~~E. D.~~ To protect sites and routes for ~~heavy rail, light rail transport, bus priority, walking and cycling as~~ proposed transport improvement schemes, ~~as~~ identified in the Allocations DPD and Action Area Plan DPDs and the Local Infrastructure Plan.

~~F. E.~~ Require ~~that the layout of~~ all new major developments to encourages walking and cycling by taking the opportunities to connect to the existing street and path network, local facilities and public transport in obvious and direct ways.

~~G. F.~~ Require ~~that the~~ all new major developments to creates attractive places that encourage walking and cycling by connecting to the existing street and path network and providing new routes where needed to provide safe, attractive, direct routes to local destinations, amenities and public transport hubs, providing a permeable network of routes that are well overlooked, and which balance the needs of all users by treating highways as streets with multiple users rather than as roads.

~~H. G.~~ Maximise the place making opportunities of interchange points, hubs and new stations.

H. The Council will require applicants to submit design and access statements which demonstrate how their plans are inclusive for people with a range of needs including children, older people, disabled and mobility impaired people and people with non-visible disabilities and conditions including dementia and autism, through access arrangements, parking provision (Appendix 3), through appropriate location, design and layout, are in line with current Local and Government Guidance.

5.20 Reasonable Alternatives

- 5.20.1 Reasonable alternative identified – less extensive changes and more compact policy – Existing TR3 policy considered out of date and no longer aligns with latest corporate transport strategy (West Yorkshire Transport Strategy 2040, TFN Transport Plan and emerging Bradford Transport Strategy 2040), as it does not take account of the use of electric vehicles as a sustainable mode of transport and the wider sustainability of car use in sustainable travel and thus a more integrated approach to sustainable travel is potentially required.

Consultation Question 23

Preferred Option:

Policy TR3: Integrating Sustainable Transport and Development

Updated policy to take account of the use of electric vehicles as a sustainable mode of transport and the wider sustainability of car use in sustainable travel and thus a more integrated approach to sustainable travel is potentially required.

Q23. Please provide your comments for Policy TR3 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

POLICY TR4: Transport and Tourism – NOT UNDER REVIEW.

5.21 Preferred Option: Policy TR5: Strategic Transport Delivery

- 5.21.1 Like many other major metropolitan authorities with a growing population, Bradford faces a myriad of transport challenges including inadequate capacity, and congestion along key transport corridors, poor connectivity and accessibility particularly for rural dwellers, parking issues in urban areas, as well as adverse environmental impacts from transport-related activities. Over the past couple of decades, the level of investment in our transport infrastructure has not kept pace with our growing population, economic agenda, technological innovations and environmental sustainability. This period of underinvestment has resulted in a suboptimal transport infrastructure, with recurring congestion and delays along major highway corridors, as well as insufficient capacity and poor service provisions on our public transport system.

- 5.21.2 The West Yorkshire Transport Strategy 2040 and emerging Bradford District Transport Strategy sets out our vision and high-level plan of actions to ensure that a sustainable transport infrastructure is in place to support the Council's goal of an inclusive and economically prosperous place where people want to live, work, study, visit and invest. The strategy not only focuses on addressing current challenges, but recognises emerging issues that will arise through future development growth; but also opportunities through technological innovations which continue to shape how we live, communicate, work, study and socialise, as well as associated transport considerations for moving people and goods.
- 5.21.3 It is also imperative the Council work closely with utility and service providers in the delivery mobile and telecommunications infrastructure, to ensure that residents and users of future developments are able to fully utilise a modern communications network to reduce their need to travel. Delivery of this infrastructure will also be vital in enabling the use of new technologies to improve the transport network. The Council will encourage the installation of fibre telecommunications and 5G networks in all future developments to maximise the potential for working from home and thus reduce the need to travel. This infrastructure will also allow for improvements to the transport network by ensuring users can access the latest real time information and maximise the use of digital ticketing.
- 5.21.4 The Council is also a key partner in the Northern Powerhouse Rail (NPR) strategic rail programme, designed to transform connectivity between the key economic centres of the North. The programme promises radical changes in rail service patterns and target journey times and the opportunity for Bradford City to act as a major new transport hub. Proposals for a City Region Transit Network creating improved connectivity across the District and integration with NPR also forms part of wider more strategic thinking about the nature and direction of public transport planning within the Leeds City Region.
- 5.21.5 Policy TR5 sets out the broad strategic transport priorities to establish a planning framework for supporting the delivery of transport improvements set out in the emerging Bradford District Transport Strategy. These strategic transport priorities are considered necessary to address issues currently facing the transport network in the District, but also to facilitate the housing and employment growth set out in the Local Plan. The Council will work collaboratively with service providers and other agencies deliver innovative and sustainable solutions to address the problems of isolation, and to manage travel demand, especially by car, in poorly serviced areas. The Council will also work closely with communities in developing of community transport partnerships and other innovative solutions to travel needs. Service providers should with work with stakeholders on the planning of new services and relocation of services in locations that meet accessibility standards.

Policy TR5: ~~Improving Connectivity and Accessibility~~ Strategic Transport Delivery

In effort to manage and improve the existing highways, public transport, walk and cycling networks, which will deliver the aspirational growth proposed through the Local Plan and other regeneration initiatives, the Council will support and prioritise programme of strategic improvements. Transport investment and management priorities of the District, as outlined in greater detail in the West Yorkshire Transport Strategy 2040 and the forthcoming Bradford Transport Strategy 2040, are as follows:

A. Walking and Cycling:

1. Improvements to Existing Networks: Improvements to the canal towpath networks across the District. Quality enhancements to improvement pedestrian and cycle safety on Primary Road Network (PRN) and Key Route Network (KRN), including the provision of new crossings.
2. New Cycling and Pedestrian Infrastructure: New cycling and pedestrian routes within Wharfedale, West and South Bradford, including the use of former railway lines.

B. Public Transport:

- A. Improvements to existing services and networks: Retrofitting older bus and rail fleet to reduce vehicle emissions and provider a better user experience. Delivering new train and increased services to cities across the North and Midlands. Additional trains and buses, calling points and enhancements to existing stations and stops across the District.
- B. New Public Transport Infrastructure: Delivery of new public transport routes and stations, including re-opening of former rail lines which provide increased connectivity for passenger and freight traffic across the Pennines.
- C. Northern Powerhouse Rail (NPR): Delivery of a new rail line between Manchester, Bradford and Leeds, and new station within Bradford City Centre.
- D. MASS Transit System: Fixed link between Bradford and Leeds Bradford Airport and Bradford – North Kirklees, delivered through new routes, and incorporating changes to existing and former rail lines.

- E. Accessibility: The Council will also support the delivery of mobile and telecommunication infrastructure in all major new developments, to assist in reducing the need to travel to access services and facilities

- F. Innovation: The Council will encourage innovation in the delivery of transport services, including car clubs and better integration between active travel and public transport.

C. Highways:

- 1. Improvements to existing networks: Delivery of junction improvements, road widening and realignments, and air quality improvement programmes across the District's existing Primary Road and Key Route Networks.

- 2. New Highway Networks and Infrastructure: Additions to the Primary Road Network / Key Route Network in South-East Bradford and Shipley to reduce congestion unlock strategic sites for housing and employment growth and provide support for regeneration areas. Delivery of new and expanded park and ride sites and associated infrastructure in key strategic locations across the District.

D. Strategic Transport Delivery

- 1. The Strategic Transport Delivery and Investment Priorities will be allocated via the Allocations DPD and the routes safeguarded from competing development to ensure their delivery.

- 2. Key strategic transport improvements arising beyond the scope of the West Yorkshire Transport Strategy, Bradford Transport Strategy and other plans that may arise during the plan period due to monitoring and review exercises will supported subject to:
 - 1. Those improving management and maintenance of existing transport infrastructure where it has the potential to support the regeneration or the use of sustainable travel options.
 - 2. Those enhancing existing transport infrastructure that has the potential to support regeneration or the use of sustainable transport options.
 - 3. Those resulting in investment in new transport infrastructure that has the potential to support regeneration or the use of sustainable travel options.
 - 4. Maintaining, improving or investing in existing or new transport infrastructure, which does not have the potential to support regeneration or the use of sustainable travel options.

~~The ability of the District's Highway, Rail and Bus Networks to provide efficient and effective travel should be protected and enhanced. Especially so on the Strategic Highway Network, key transport networks for highway and bus, and the rail network (as identified in LTP and LCR Transport Strategy); including routes required to provide access to Leeds Bradford International Airport, other regional Airports (including Manchester International Airport), Leeds City Region centres and neighbouring cities, towns and urban areas through improvements described in the Infrastructure Plan.~~

~~Support for improvements to transport provision in the more isolated and poorly serviced areas of the District, (as identified through application of the Accessibility standards in Appendix 3) to address the economic and social problems that these locations experience. Including, but not exclusively:~~

~~A. Encourage the development of sustainable transport or other solutions in isolated areas to facilitate access to services.~~

~~B. Influence the way in which services are delivered including support for mobile delivery and remote accessing through improved use of IT and telecommunications~~

~~C. Seek to co-ordinate services and transport provision to isolated areas and communities and encourage the development of partnerships to deliver sustainable transport solutions.~~

~~D. Encourage the development of innovative and sustainable solutions to transport problems in isolated areas including, but not exclusively; community based transport, flexible routing, demand responsive services and more efficient use of vehicles throughout the day~~

~~E. Technologies and models of vehicle ownership and use (such as through car clubs) to improve the environmental impacts and sustainability of transport should be supported.~~

~~F. The Council will work with transport providers and developers to meet the needs of disabled and mobility impaired people through access arrangements, parking provision (as set out in the Parking Standards in Appendix 4), and ensuring that developments including transport infrastructure are accessible to and usable by disabled and mobility impaired people as motorists, public transport users and pedestrians through decisions on location, design and layout, in line with current Local and Government Guidance. Development proposals above agreed thresholds should be accompanied by an approved design and access statement.~~

5.22 Reasonable Alternatives

5.22.1 No reasonable alternatives selected

Consultation Question 24

Preferred Option: Policy TR5: Strategic Transport Delivery and Investment Priorities

Wide ranging update and refocus of the policy.

Q24. Please provide your comments for Policy TR5 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.23 Preferred Option: Policy TR6: Freight

- 5.23.1 The freight sector contributes 25% of West Yorkshire's economy and supports the wider economy by enabling business to take place and goods to be transported. Efficient access for goods and services, and the maintenance of efficient freight and distribution links, is a key factor in supporting the vitality of the District, although this must be reconciled with the need to make the towns and cities pleasant places to live and work, and attractive to visitors.
- 5.23.2 Greater use needs be made of existing road/rail intermodal facilities, and the extensive rail network where opportunities arise. In encouraging a more sustainable pattern of freight transport, consideration should be given to the development of distribution parks where clusters of businesses would deal with warehousing, picking and delivery operations in a more integrated fashion.
- 5.23.3 Key routes on the highway network can be relieved to some extent by modal shift but will also need to be protected to ensure that, where appropriate, freight movements have higher priority than car commuting.
- 5.23.4 Air freight, which is shipped to or from Bradford District, is currently largely serviced by facilities at airports outside the region. There is a need to examine the scope for the development of air freight facilities at LBIA, where environmentally acceptable, in order to meet demand from Bradford District and to optimise the contribution LBIA makes to the regeneration and competitiveness of Bradford District, while helping to reduce the need for long road journeys to south-east airports. This will need to be supported by improved surface access to the airport.

- 5.23.5 The West Yorkshire Transport Strategy 2040 and emerging Bradford Transport Strategy 2040 contains guidance on freight, which outlines how the freight industry and other business will be supported. These strategies will be used to guide investment decisions and for securing additional funding and sets out what will be done to support the efficient movement of freight and how the adverse impacts of freight movement will be addressed. The Core Strategy policies have been aligned to these transport strategies to ensure consistency.

Policy TR6: Freight

The District will encourage the development of an integrated freight distribution system, in line with the ~~LTP 3 Freight Strategy~~ [West Yorkshire Transport Strategy 2040 and Bradford Transport Strategy 2040](#), that makes the most efficient and effective use of all modes of transport subject to environmental considerations including the need to protect and enhance residential areas and locally, regionally, nationally and internationally important biodiversity sites. Planning and development decisions and transport policies should:

- A. Maximise the use of rail for freight movements to and from new and existing developments and significant changes of use.
- B. Encourage the location of storage/distribution development with high levels of freight and commercial traffic close to intermodal freight facilities, airports, or roads designed and managed as traffic distributors.
- C. Encourage the protection of rail connected land for future uses that require rail freight use and seek to encourage the development of intermodal interchanges and improvements to multi-modal transfer facilities.
- D. Encourage Consolidation Centres serving retail locations.
- E. Encourage capacity enhancements, appropriate standards of maintenance and gauge improvements on key rail freight routes.
- F. Encourage the development of sites for new secure HGV parking facilities particularly close to major freight generators and improve signing from major lorry routes to District HGV parks.
- G. Encourage the development, delivery and maintenance of an integrated strategic HGV routing network, Urban Traffic Management Control (UTMC), and a consistent cross boundary approach to HGV management ~~including the introduction of~~ [and potential](#) freight priority lanes [in appropriate locations](#).
- H. Support future pipeline developments where these provide opportunities to reduce freight movements by surface modes of transport.

I. Enable a more efficient and sustainable approach to deliveries, including the encouragement of Delivery Service Plans and Freight Quality Partnerships between Local Authorities, the freight industry, business communities, residents and environmental groups.

J. Support measures to reduce the adverse impact of freight movements on air quality including addressing specific freight emissions hotspots possibly through the transfer of freight from road to rail, encouraging and facilitating the use of low emission vehicles and the introduction of Low Emission Zones where found to be appropriate.

K. New freight park site within South Bradford and the provision of appropriate levels of freight parking within new developments, in line with Appendix 3. Junction improvement programme to provide upgrades to allow safe access for HGVs and LGVs to key employment areas and sites.

5.24 Reasonable Alternatives

5.24.1 Reasonable alternative identified – less extensive changes and more compact policy – Existing TR6 policy considered out of date and no longer aligns with latest corporate transport strategy (West Yorkshire Transport Strategy 2040, TFN Transport Plan and emerging Bradford Transport Strategy 2040). The need to address inappropriate HGV parking within residential areas is considered a corporate priority, and the Council consider Criteria K. to further support industrial and warehousing sectors by promoting improved freight infrastructure and services.

Consultation Question 25

Preferred Option:

Policy TR6: Freight

The policy now includes the need to address inappropriate HGV parking within residential areas is considered a corporate priority, and the Council consider Criteria K. to further support industrial and warehousing sectors by promoting improved freight infrastructure and services.

Q25. Please provide your comments for Policy TR6 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

Policy TR7: Transport Investment and Management Priorities – NOT UNDER REVIEW

Policy TR8: Aircraft Safety – NOT UNDER REVIEW



SECTION 5

Thematic Policies:
Housing

Section: Housing

5.25 About

5.25.1 This section of the local plan is concerned with key policies which seek to ensure the delivery of housing to meet the District's needs, and includes updates to:

- the District's Housing Requirement;
- Strategic Sources of Supply;
- Housing Distribution;
- Managing Housing Delivery in a Sustainable Way;
- Housing Mix and Quality;
- Affordable Housing, and
- Accommodation requirements for Gypsies, Travellers and Travelling Showpeople.

5.25.2 The Government's aim as set out in the White Paper "Fixing our broken housing market" (2017), is to reform the housing market in order to significantly increase the supply of new housing and focus on planning for the right homes in the right places, building homes faster, and diversifying the housing market. To support the Government's objective of significantly boosting the supply of homes the NPPF sets out that Local Plans should provide a framework for addressing local housing needs. This is to be achieved by identifying suitable land for housing, addressing the needs of groups with specific housing groups and developing land with permission.

5.25.3 The District has around 217,000 dwellings and 208,961 households. The population of the District is projected to increase over the plan period with a significant increase in the number and proportion of older residents and households. House prices have increased over the last five years but are generally lower than regional and national averages. The District is one of the most affordable local authority areas in the Leeds City Region, with a lower quartile house price to income ratio of 4.6 in 2018. Housing delivery has averaged 1,261 net new dwellings per year over the past five years, which is below the adopted Core Strategy target.

5.25.4 Based on evidence in the latest Strategic Housing Market Assessment (SHMA, 2019) the Bradford District is considered a self-contained housing market area and an appropriate housing market area for local plan making purposes. However, the District has a varied and diverse housing market with a range of areas from urban centers, to smaller towns and villages. Within the District there are a number of housing market sub areas identified in the SHMA, which exhibit broadly similar housing market characteristics.

5.25.5 The SHMA indicates that there is an on-going need for all types and sizes of dwellings. It is important for the Local Plan to ensure that the quantity and

appropriate mix of housing (including affordable homes) is delivered and the housing needs of specific groups are met going forward. Key housing market issues for the District include low end sales and rental values in some areas which are a challenge to delivery, an ageing stock, demographic changes and the need for a broader housing offer for older people and for more quality and diverse housing.

5.26 What you told us

- 5.26.1 A wide range of comments were received on housing issues as part of the initial scoping consultation. These included general support for using the standard method for calculating local housing need as a baseline, some suggesting that the supply of new homes needs to match economic growth ambitions and that the council should continue with the current adopted housing requirement. There were also a range of responses indicating that the council needs to consider constraints such as infrastructure capacity and the impact on protected areas, greenfield and green belt land in determining the housing requirement.
- 5.26.2 With regards to the housing mix, quality of housing and affordable housing there was strong support for the council updating the SHMA and viability evidence to inform these policies. In terms of housing mix there was support for the policy to continue to plan for an appropriate mix of housing to meet need and demand. However, responses varied from the need for policies to be flexible and not overly prescriptive to setting housing mix on a sub area basis. There was support for providing homes that are suitable to meet the needs of older people and people with disabilities and if adopting higher optional standards for accessible homes and space standards, the council should only do so by applying the criteria set out in the PPG, including evidence of viability and need.
- 5.26.3 For affordable housing, responses indicated that the Council should seek to meet the full evidenced affordable housing need and use up to date viability information to determine viable affordable targets across the District. There was general support for the inclusion of a policy requiring affordable housing on site and that the policy should reflect the need for different tenures.
- 5.26.4 Comments were also received from people concerned to ensure that the Council makes the best use of available land for future new homes, maximises the reuse of land which has been previously developed and ensures that sites can be delivered. There was also a mixed response to site phasing and concern to ensure that future development brings forward new infrastructure to support growing communities

5.27 Findings and Policy Directions

- 5.27.1 The Council has updated its housing evidence in its SHMA (2019) and undertaken a Local Housing Need Assessment using the Government's standard method as set out in the national guidance. A range of evidence has been considered regarding the justification for any uplift to the baseline local housing need. The council has

also produced additional evidence on the need and viability of accessible housing and is preparing a whole plan viability assessment.

- 5.27.2 Based on a range of evidence it is considered that the housing need figure of 1,703 dwellings per year over the plan period is an appropriate and justified basis for determining the number of homes required. With regards to affordable housing the latest SHMA (2019) identifies a need for approximately 441 affordable homes annually.
- 5.27.3 Analysis in the SHMA indicates an on-going need for all types and sizes of dwellings, with delivery of houses remaining a priority with an increasing emphasis on the need for flats and bungalows/level access accommodation.
- 5.27.4 Specific groups identified as having particular housing requirements in the District include families, older people and Black and Minority Ethnic (BME) households. In terms of specialist housing the SHMA has provided evidence of the scale and range of dwellings needed. The research has identified a particular priority to deliver a broader housing offer for older people across District, with an identified need for additional specialist housing for older people. Given the ageing population identified and levels of disability amongst the population, it is recommended that a policy to provide new homes built to higher accessibility standards is included in the Local Plan. The SHMA also includes an updated Gypsy and Traveler Needs Assessment, which provides information on future pitch requirements.

5.28 Preferred Option: Policy HO1: The District's Housing Requirement

Assessing the Number of New Homes

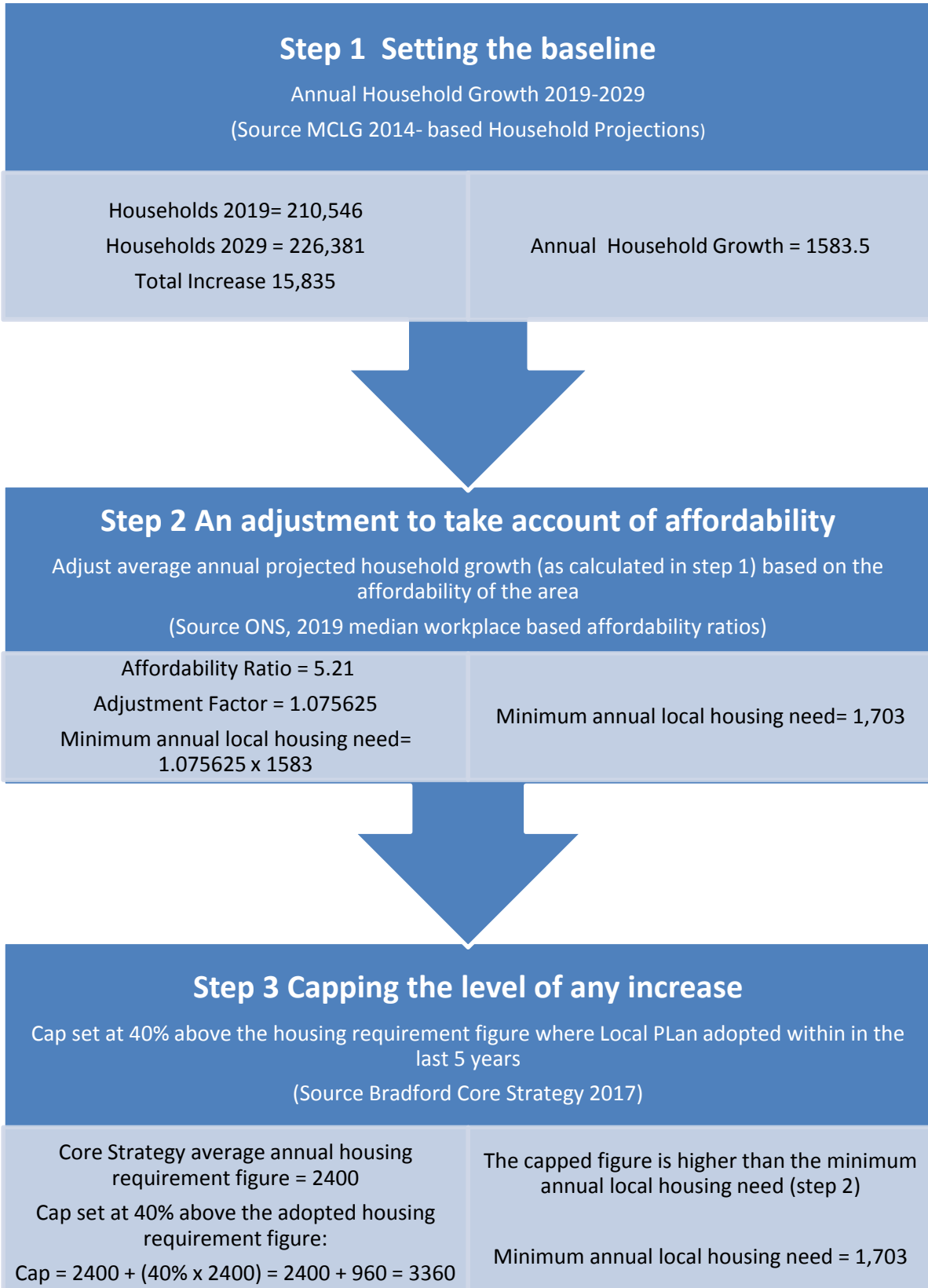
- 5.28.1 One of the key roles of the Core Strategy is to assess and then set out the number of new homes which will need to be planned for to meet the needs of the District's current and future population and support the local economy.
- 5.28.2 The provision of sufficient new homes of the right quality will provide both direct and indirect benefits to the District's economy and is key to achieving the Core Strategy's Vision and Objectives. Furthermore, the Council considers access to good quality housing to be a key requisite for improving life prospects, in particular for health and educational attainment.
- 5.28.3 At a more practical level, determining the housing requirement is critical to the Core Strategy since it feeds directly into the spatial strategy by determining how much land is needed for new housing development.
- 5.28.4 Determining the housing requirement within this Core Strategy Review has been undertaken in three key stages. Firstly, in line with the NPPF, the Council has

undertaken a Local Housing Need Assessment, conducted using the standard method in national planning guidance using robust and up to date evidence. Secondly, it has then been considered whether local circumstances indicate if housing need is higher than the standard method. This has been assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Thirdly, it has been considered whether it is feasible and appropriate to plan for this level of housing growth bearing in mind such constraint factors as deliverability, land supply, environmental impacts and Green Belt.

Local Housing Need

- 5.28.5 The Government's standard method uses a formula to identify the minimum number of homes to be planned for, which addresses projected household growth and historic under-supply. Figure 1 (below) summarises the standard method calculation as it currently stands. The planning practice guidance (PPG) details the standard method for assessing housing need and clarifies that the 2014-based household projections should be used to set the 'baseline' (Step 1) for the standard. The method provides the council with an annual number, based on a 10-year baseline, which can be applied to the whole plan period. It is important to note that the standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure.

Figure 1: Standard Methodology Calculations



5.28.6 PPG also identifies that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. In line with the PPG the council has considered if there are any factors to justify any uplift to the LHN figure as set out above. These include situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

5.28.7 In addition, in line with the PPG, the council has also considered whether an increase in the total housing figure included may need to be considered where it could help deliver the required number of affordable homes.

Growth strategies and Strategic Infrastructure Uplift

5.28.8 It is recognised that the District has strong ambitions for economic growth as set out in its Economic Growth Strategy 2018-2030. This strategy sets ambitious targets for a growing the economy. The Local Plan will support these ambitions and aspirations. The PPG (para 10) is however clear that any uplift to housing need should be based on deliverable strategies, for example where funding is in place to promote and facilitate additional growth, for example through Housing Growth Deals. The council is part of the Leeds City region which benefits from an existing £1 billion plus growth deal. However, the council does not currently have any formally adopted 'growth deal', which would drive demand for housing growth or significant increase in housing delivery, above the minimum Standard Method baseline figure in the short term.

5.28.9 Whilst the council has strong ambitions for growing the District's economy, analysis of latest economic and demographic evidence in Employment Land Review (ELR) and SHMA does not currently demonstrate clear evidence for an economic uplift from the standard method figure. There is no evidence that the District has an 'overheated' jobs market with new labour demands driving a need for housing above the minimum standard method figure. Indeed, the economic evidence is suggesting quite the opposite – a low job density level, low economic activity rates and relatively high unemployment rates. This highlights the significant amount of labour capacity within the existing population. There is significant flexibility in the indigenous labour market with the right incentives to support economic growth without pushing housing demand above the standard method baseline. It is therefore considered that the Core Strategy's approach to future economic growth can be broadly supported by the 1,703 minimum housing delivery figure.

- 5.28.10 With regards to strategic infrastructure improvements, the Council considers that Northern Powerhouse Rail (NPR) project provides Bradford with a once in a lifetime opportunity to improve its rail connectivity and allow the city to operate at its full potential, contributing to economic growth across the north of England. The council has commissioned a range of technical studies to support the wider economic case for a NPR station in Bradford city centre and understand the combined economic potential of the cities for Leeds and Bradford post High Speed 2 and NPR. While there has however been a recent well-publicised pledge of support for the NPR project, no final decision or confirming funding for this scheme has been made. The Council has mainstreamed support for this project within its transport policies but recognise that any delivery is likely to impact towards the end of the plan period.
- 5.28.11 In summary, based on the latest available economic evidence it is considered that there is currently no clear justification for an uplift to the local housing need figure. In addition, there is considerable uncertainty regarding the impact of Brexit on the economy over the next few years. The council will continue to monitor economic growth forecasts, committed strategic infrastructure investment, economic performance and housing market indicators and keep the local housing need figure under review though the requirement to review local plans at least every 5 years. It will also take a positive and flexible approach to supporting delivery of new additional housing on windfall and brownfield sites to support the council's growth and regeneration ambitions.

Unmet Housing Need from Neighbouring Authorities

- 5.28.12 Any housing needs that cannot be met within neighbouring Local Authorities should also be taken into account in establishing the amount of housing to be planned for. The council currently has no agreement to take any unmet leave from neighbouring Local Planning Authorities, as set out in a statement of common ground.

Uplift to deliver additional affordable housing

- 5.28.13 The PPG (paragraph 24) sets out that an increase in the total housing figure included in the plan may also need to be considered where it could help deliver the required number of affordable homes. The latest SHMA (2019) indicates that there is an affordable housing need of around 441 homes/year. Based on the latest local housing need figure of 1703 homes/year this is broadly comparable to the current district-wide affordable housing target of 20% to 25% in the adopted Core Strategy (2017). The council will therefore continue to seek to deliver affordable housing to meet identified need in line with the approach in Policy HO11 Affordable Housing. However, it is not considered that the scale of need for affordable housing justifies an uplift to the overall housing requirement figure at this stage.

Determining the Housing Requirement

- 5.28.14 National planning policy is clear that LPAs should seek to meet their identified housing need (and any needs that cannot be met within neighbouring areas) unless there are constraints or any adverse impacts of doing so would significantly and

demonstrably outweigh the benefits. Where this is the case, then the LPA should work with neighbouring authorities to assess the role they could play in accommodating some of the unmet need.

- 5.28.15 In setting the housing requirement it is therefore necessary to consider if the local housing need figure can be met in terms of any constraints and any significant adverse impacts to delivery. The adopted Core Strategy (2017) housing requirement plans for housing growth of around 42,100 homes from 2013-2030, equating to around 2400 new homes /year. The plan was found sound on the basis that this level of growth could be sustainably accommodated in the District, albeit requiring the release of Green Belt land.
- 5.28.16 A number of updated evidence documents have considered land supply (SHLAA), the social, environmental and economic effects of development (Sustainability Appraisal/Habitats Regulations Assessment) and the capacity of existing (or need for new) infrastructure to support the scale of planned growth (Local Infrastructure Plan). The District also contains a number of protect areas or assets of particular importance as defined in the NPPF (paragraph 11) including Green Belt and Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Further evidence, including the Green Belt review will be considered through the plan preparation with regards to strategic constraints. However, it is currently considered that there are no fundamental strategic constraints or significant adverse impact to delivering the revised Local Housing Need figure that cannot be mitigated. It is therefore, considered there is currently no justification for setting a Local Plan housing target lower than the Local Housing Need figure or requesting that neighbouring local authorities take some of the identified housing need.
- 5.28.17 Table HO1 below summarises the approach and key analytical steps undertaken in setting the housing requirement, which is then detailed in the redrafted Policy HO1. The housing allocation requirement, which includes the prior consideration of windfall and clearances / losses, is discussed further within Policy HO2.

Table HO1: Calculating the Housing Requirement

Local Housing Need		Annual number of homes	Plan period (17 years)	Total
A	Minimum Baseline Local housing need assessment	1703	1703 x 17	28,951
B	Local Housing Need Uplift	0	N/A	0
C	Unmet need taken from neighbouring LPAs	0	N/A	0
D Other considerations	Uplift to deliver additional	0	N//A	0

	affordable housing			
E Total Local Housing Need	A+B+C+D	1703	1703 x 17	28,951
F	Reduction due to the application of NPPF policies that protect areas or assets of particular importance in the plan area	0	N/A	0
G	Any unmet need taken by neighbouring LPAs	0	N/A	0
Total Housing Requirement	E-F	1703	1703 x 17	28,951

Policy HO1: The District's Housing Requirement

A. Provision will be made within the Local Plan to facilitate ~~the scale of new housing development~~ a housing requirement of 28,951 new homes over the plan period 2020-2037 as set out in Table HO1.

B. After making an allowance allowing for projected losses of stock through clearance and for a contribution from windfall sites as set out in Policy HO2 ~~net completions over the period 2004-13 and an allowance for the projected reduction in the number of vacant homes~~, the Local Plan will allocate land ~~to meet the remaining requirement~~ for at least ~~42,100~~ 26,150 homes over the period ~~2020~~2013 to 20370;

~~C. Forthcoming DPD's will assess the projected losses to the existing housing stock from clearance and change of use and increase the level of allocations to compensate accordingly.~~

5.29 Reasonable Alternatives - Overall Approach and Key Spatial Priorities

5.29.1 The reasonable alternatives considered:

- Reasonable Alternative 1: Maintain the current Core Strategy housing requirement target of 2473 dwellings per year. This would represent an uplift on the Local housing Need figure of 1703.
- Reasonable Alternative 2: A lower the housing requirement below the Local Housing Need figure of 1,703 dpa.

Consultation Question 26

Preferred Option: Policy HO1: Housing Requirement

The Preferred Option makes reference to the updated housing requirement figure for the plan period, consistent with the government's standard method approach for calculating Local Housing Need.

Q26. Please provide your comments for Policy HO1 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.30 Preferred Option: Policy HO2: Strategic Sources of Housing Supply

- 5.30.1 While Policy HO1 sets out the total housing requirement for the district Policy HO2 indicates how this requirement will be met. This includes an assessment of the contribution which can be made from the current supply of housing land and whether any additional sources of supply will be required. National guidance states that Local Planning Authorities should undertake regular monitoring of planning commitments and housing land supply assessments to establish realistic assumptions on whether this supply can meet the housing requirement. This in turn informs consideration of the need to identify new sites, new growth areas and even establish whether there may be a need to release land from the Green Belt.
- 5.30.2 Policy HO2 sets out the sources of supply which the Council propose will meet the housing requirement set out in Policy HO1. The changes made reflect the updated evidence base since the Core Strategy was adopted. In some cases the scale and spread of the types of housing land supply have changed.

Planning Commitments

- 5.30.3 Given the scale of housing need in the District it is important that best use is made of existing sources of supply and that the assumptions regarding delivery on these sites is robust and realistic. Intelligence from the current housing supply with planning commitments (planning permissions) has been used to determine which sites will still continue to deliver units from 1st April 2020 onwards, including those under construction and yet to start. This base data is then used as a starting point to calculate how many additional homes will be required from sites which need to be allocated through the Allocations DPD for development.

Other Sources of Supply

- 5.30.4 The NPPF requires Local Planning Authorities to ensure that all reasonable options for meeting its housing requirement are considered. Strategic Housing and Employment Land Supply assessments involve calculating the extent of available land which could accommodate new homes and determining how much of this supply would be suitable for development.
- 5.30.5 Whilst a significant amount of land has been suggested to the Council through the call for sites, much of this land is in sensitive locations such as the adopted Green Belt, may require on or off-site infrastructure provision, or may be required for other types of development. As such the assessment involves consideration of whether the site is currently suitable or potentially suitable in the short, medium and long term or whether it is unsuitable for development on the basis of one or more development constraints. Further detailed analysis which takes information from the Green Belt review, further highways assessment and other impacts on site suitability and viability will be taken at the Site Allocations stage of the Local Plan.
- 5.30.6 NPPF paragraph 70 indicates that it is reasonable to make an allowance for windfall sites as part of the anticipated future supply, as long as there is compelling evidence to do so and that any allowance is realistic. Windfall sites are defined as sites not specifically identified in the development plan. Windfall falls into 2 types; small infill developments which lie below the threshold for allocation (which is 0.2ha or 5 units in Bradford's Local Plan) and that from larger new sites such as recycled land and buildings which emerge after the new plan has been adopted. The amount of windfall will vary over time but will often be lowest at the point of plan adoption and higher in the periods before a new plan is formulated. These levels are also influenced by economic and housing market conditions which affect the nature of areas and the demand of former buildings that were in business or office use. Based on historic windfall delivery rates and future trends the Council considers that it is reasonable to make a modest assumed contribution of 300 units per annum for years 3-17 of the plan-period⁸. The inclusion of a windfall allowance is a change from the approach within the current Core Strategy but one which the Council considers justified by a combination of emerging trends in windfall, changes to government guidance, and the need to ensure that the need to release land from the Green Belt is minimised.
- 5.30.7 Even with an allowance for windfall, the supply data indicates that there is insufficient land to meet the housing requirement from sites with existing planning permissions or in areas which are currently policy compliant. The contribution which may be required from land released from the Green Belt is currently estimated to be likely to be just under 5,000 homes (see also section 3 and Policy SC7 – Green Belt). This is on the assumption of a full contribution from planning commitments and a discounted contribution from sites assessed as suitable and developable. This is broadly the same approach to assessing the supply which was used to

⁸ In terms of the housing allocation calculations the 'gross' windfall estimate needs to be set against a small allowance for demolitions and losses which has been circulated at 100 units per annum over 17 years of the plan.

inform the adopted Core Strategy and which was considered sound following its public examination.

- 5.30.8 Table HO2 below illustrates the current sources of supply to meet the housing requirement of 28,951 homes and the current total contribution possible from that supply. Data is currently based on monitoring on completions up to 31st March 2018 and planning permissions approved before 31st March 2019.

Table HO2: Sources of Supply

Dwellings from sites with planning Permissions approved at 31st March 2019	Comment	Number of Units approved
Remaining Units (post 2020) from sites under construction	Further monitoring will be undertaken to assess implementation rates and lapse rates	3,301
Undeveloped sites with detailed permission		3,737
Undeveloped sites with outline permissions	Further monitoring will determine site achievability	3,793
Additional planning permissions approved between 31 st March 2019 and 31 st March 2020	To be determined from further monitoring	0
Total Commitments		10,831
Potential Contribution toward housing requirement		37%
Other Sources of Supply	Comment	Forecasted Number of Units
Sites assessed as currently suitable for residential use	Sites where there are no existing policy or physical constraints to prevent planning permission being granted for residential development. * <i>Note it cannot be guaranteed that all these sites will be implemented</i>	11,467*
Windfall allowance	Allowance for years 3-17 (15 years x 300)	4,500
Sites currently assessed as potentially suitable for development	Includes sites currently protected as Green Belt** ** <i>Not all of these will necessarily be considered appropriate for allocation following further detailed assessment</i>	31,110

5.30.9 In formulating the approach to Policy HO2 the Council have also taken account of the Council's corporate strategies including its Economic Strategy and associated key regeneration and growth areas.

Policy HO2: Strategic Sources of Housing Supply

A. The ~~dwelling targets~~ housing requirement set out in Policy HO1 ~~The housing requirement set out in Policy HO1~~ will be met through:

1. ~~Housing completions since April 2004 and~~ commitments with planning permission at 31st March 2020 including from partly developed sites

~~2. Existing commitments with planning permission and~~

~~3. Unimplemented but deliverable or developable sites allocated for residential development in the RUDP~~

~~4. Safeguarded land sites identified in the RUDP~~

~~2.~~ 5. Additional new deliverable and developable sites allocated for housing development within the ~~forthcoming~~ Local Plan Development Plan Documents including:

- the Allocations DPD
- the Bradford City Centre
- Shipley and Canal Road Corridor AAP
- ~~Local~~ Neighbourhood Plans

3. A windfall allowance of 300 units per annum over 15 years

B. Specific area-based initiatives to help deliver the supply targets will include:

~~1. Growth areas as follows:~~

~~i) the development of an urban Eco Settlement in the Shipley and Canal Road Corridor~~

~~ii) Bradford City Centre~~

~~iii) SE Bradford, and~~

~~iv) Queensbury, Thornton, Silsden and Steeton with Eastburn~~

1. Regeneration of Bradford City Centre, to include support for the intensification of residential development.

2. Development of Shipley and Canal Road Corridor.

3. Regeneration initiatives within Bradford to include:

- Inner city areas of Manningham and Little Horton
- North East Bradford – Ravenscliffe and Thorpe Edge
- East Bradford – Barkerend, Beech Grove, Bradford Moor, Thornbury, Woodhall and Laisterdyke
- South East Bradford – Bierley and Holme Wood
- South West Bradford – Buttershaw and Woodside
- West Bradford - Allerton

4. Regeneration of Keighley

~~iii) SE Bradford, and~~

~~iv) Queensbury, Thornton, Silsden and Steeton with Eastburn~~

~~2.5. An Sustainable Urban Extension at Holme Wood~~

~~3.6 Local Limited Green Belt releases where consistent with the Plan's sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area.~~

5.31 Reasonable Alternatives

- 5.31.1 No reasonable alternatives identified - update the context of the policy to bring it in with the revised strategic priorities of the Local Plan

Consultation Question 27

Preferred Option:

Policy HO2: Strategic Sources of Housing Supply

This Policy sets out the sources of supply which the Council will consider to meet the housing requirement set out in Policy HO1. The policy has been updated to bring it in line with the revised strategic priorities of the Core Strategy.

Q27. Please provide your comments for Policy HO2 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.32 Preferred Option: Policy HO3: Distribution of Housing Development

Background

- 5.32.1 Within the adopted Core Strategy Policy HO3 is a key component of the plan's overall spatial strategy as it sets out the distribution of the housing requirement and sets targets for housing development within individual settlements and sub areas.

5.32.2 The Council is reviewing Policy HO3 as a result of reductions in the scale of housing need within the district. This in turn reflects significant changes in both the rate of population and household growth in official projections and in the Government's methodology for assessing housing need. The review has also been informed by extensive updates to the evidence base most notably:

- the Strategic Housing land Availability Assessment (SHLAA);
- the Strategic Housing market Assessment (SHMA);
- an updated Level 1 Strategic Flood Risk Assessment;
- a new Local Plan Viability Assessment;
- the Council's latest proposals and priorities for regeneration and renewal, and
- updated programmes for investment and infrastructure.

Further factors within the review have included changes to national planning policy, an amended plan period, and the need to reflect the programme of Neighbourhood Plans which have been completed or are underway.

5.32.3 The current adopted Core Strategy focuses the majority of housing development within the Regional City of Bradford (27,750 homes or 66% of the district wide total) and the Principal Towns (6,900 homes or 16%). Significant development, albeit at a smaller scale (4,900 homes in total) is proposed within the 6 Local Service Centres. The Local Service Centres, which are the smallest settlements within the district see the smallest targets, but all are required to make a contribution to meeting district and local housing need.

5.32.4 While the adopted plan's housing distribution represented a sound and sustainable approach at the time, the review will allow the Council to ensure that the refreshed spatial distribution continues to support housing delivery and key Council regeneration priorities, maximise the use of previously developed land, improve housing choice and focus growth to support spatial priorities while minimising the requirement for green field and Green Belt sites.

Scoping Stage and Detailed Representations

5.32.5 The key issues raised during the consultation on the initial Core Strategy scoping included:

- re-emphasising that housing targets should be seen as minimums;
- general support for the role of the settlement hierarchy in determining housing distribution;
- both support for the use of brownfield land and concern that the review might give undue prioritisation of such land;
- concerns that the review might result in greater concentration of development in the areas of the district – particularly the regional city – where viability and deliverability is a problem;

- Green Belt – with some respondents seeking to see housing targets which minimised or avoided green belt change while others arguing that green belt land releases were justified in sustainable locations and in support of housing need and housing delivery;
- concerns over the impacts of housing development on local infrastructure;
- a suggestion that the housing distribution should reflect the need for the delivery of affordable homes, and
- the need for housing targets to reflect the need to protect key environmental assets in particular heritage and also minimise flood risk.

In addition, a variety of comments were received in support of higher or lower housing targets for specific settlements and areas.

Key Directions

5.32.6 The Council considers that the most appropriate approach to determining the housing distribution – i.e. the key factors and most important elements of the evidence base – remain the same as was the case when the adopted Core Strategy was formulated. This means an approach where the main principles are:

- alignment with the Core Strategy vision and objectives;
- alignment with the settlement hierarchy;
- maximising the benefits of growth; and
- minimising the impact on critical environmental assets.

5.32.7 However this does not mean that the district wide housing requirement should be distributed in exactly the same proportions as in the adopted plan. A lower housing requirement combined with an updated land supply may for example open up reasonable options which were not available at the time of the adopted plan's preparation.

5.32.8 The Council also needs to reflect on any changes to the Government's national planning policy framework and guidance. This includes an increased emphasis on the need to promote the use of previously developed land and buildings, revised guidance on when exceptional circumstances might exist for change to the green belt, and support for examining the potential for increasing densities and maximising development opportunities around city and town centres and locations well served by public transport.

5.32.9 These policy directions might indicate that options for distribution focused on urban concentration are most favoured however the Council has also been mindful of a shift in Government policy on viability whereby the emphasis on proving that development sites and proposals are viable is now focused on the plan making stage rather than being left to the point where planning applications are made. The need to deliver affordable housing in higher cost areas, the need to increase

housing choice, facilitate the ability for young people and first time buyers to access housing and the role that housing can play in supporting local services and local centres also all remain important.

5.32.10 In the light of these varied goals the alternative distribution options (see below) have been carefully selected to test options with varying degrees of urban concentration and dispersal to smaller centres while remaining reasonable alternatives.

5.32.11 The key aspects of the updated evidence base in refreshing the housing distribution have been as follows:

- **SHLAA** – the Council has published an update on land supply and a full review of the SHLAA is well advanced. Although the total amount of land and capacity within the emerging SHLAA has remained at a similar level, there has been a degree of churn both in terms of geographical distribution and type. This is the inevitable result of the continual updating as sites are either implemented or are removed and new sites are added either through planning permissions or through call for sites. The scale of deliverable and developable land supply remains a key constraint. The information from the SHLAA has therefore been crucial to developing the both the preferred distribution option and testing of other options.
- **SHMA** – the council has commissioned consultants arc4 to produce an updated Strategic Housing Market Assessment. The update confirms that there is a continuing and significant need for affordable housing of around 441 dwellings per annum. Gross need is apparent across all of the 7 sub areas identified in the SHMA with the largest concentration in the City Central area. At the same time there is also a need to deliver homes in the higher value areas of the district including within Wharfedale.
- **Updated Level 1 SFRA** – the results of the recently completed and updated SFRA level 1 (2019) (Draft) have been taken into account to inform a strategic approach to the sequential test applied to the whole local planning authority area and the Sustainability Appraisal (SA) of the Local Plan, so that flood risk is fully taken into account when considering strategic distribution options, In particular the boundaries and areas within different flood zones have been updated and this has allowed for an examination of the implications of each alternative distribution option for meeting the sequential approach to minimising flood risk.
- **Bradford Growth Assessment & Emerging Green Belt Review** – The Bradford Growth Assessment which was produced in support of the adopted Core Strategy remains a relevant piece of evidence in supporting the view that if required there are options and locations for green belt releases which can be achieved in a sustainable way. However, this evidence is now being

complimented by a more detailed piece of work, the Green Belt Review, which will inform both the Core Strategy and emerging Allocations DPD.

Neighbourhood Planning

5.32.12 Within the District there are a number of Neighbourhood Plans which have been prepared or are in preparation. These are mainly focused on the parishes containing the smaller settlements. Most have chosen not to address housing site allocations. However where this is the case the revised text within the CSPR will confirm how the housing requirements for those plans will be determined. It is expected that the allocations to meet those targets must be made within or adjoining the settlements named within Policy HO3 and within the settlement hierarchy.

Windfall Development

5.32.13 The targets set out within the revised Policy HO3 have been set to reflect the residual housing requirement which is left after allowance has been made for future windfall and for future clearances and losses. Unlike in the current Core Strategy it is proposed that allocations are not made in some villages while in others targets have been reduced significantly. However, there is still a need to utilise any modest opportunities for windfall developments which would support housing choice and affordable housing delivery in these locations and the Policy HO3 has new text to make this clear. It also remains the case that there is an option for Neighbourhood Planning bodies to promote more development than that set out within the strategic policies of the development plan within Neighbourhood Plans provided they can do so in a sustainable way.

Green Belt

5.32.14 Green Belt change where sustainably located, carefully planned and realised and where fully justified can make a positive contribution to the strategic planning of the District and for meeting the needs of its population. However, the Council continues to seek to minimise the extent of Green Belt change – for example in the housing distribution option it is proposing. In the adopted Core Strategy, the Council indicated that there were exceptional circumstances for green belt change to meet housing needs in 23 out of the 27 different settlements reflecting the scale of need and the constraints in the available land supply. It was estimated that sites with a capacity for around 11,000 units would be needed from Green Belt sites. The CSPR has allowed for the need for and extent of such releases to be re-examined and a distribution to be proposed which reduces both the amount Green Belt releases and number of settlements affected by such releases to be reduced to under 5,000 and 12 respectively.

Preferred Option: Overview

5.32.15 The section below sets out the preferred option for Policy HO3. Given the overall reduction in the District wide housing requirement most areas have reduced

housing targets. However, the areas where there is most significant change – in particular most change in the proportion of development – are picked out in the table HO3 below:

Table HO3: Distribution of Growth Headlines

Regional City	The total level of proposed housing in the regional city has reduced by over 9,000 units from 27,750 in the adopted Core Strategy to 18,400 but this represents an increase in the proportion of the district wide requirement to just over 70% (compared to 66% in the adopted plan).
Bradford City Centre	A slightly increased housing target of 4,000 units means a significant uplift in the proposed proportion of the district's housing requirement to be focused in the centre (from 8.3 to 15.3%). While the SHLAA indicates a potential land supply which could meet this target and the regeneration benefits of the proposal are clear, the Council acknowledges the challenges in delivering such a level of growth and will further investigate how housing delivery at this level might be supported and achieved.
Bradford SE	The proportion of housing assigned to this area has slightly decreased and this reflects the fact that the delivery of the Holme Wood urban extension, which is still a Council priority in combination with regeneration and infrastructure proposals, is likely to straddle this and the following plan periods.
Bradford NE	The proposed target for this area has been reduced by more than ½ (and the proportion from 10.5% to 7.6%) in part reflecting a significant reduction in available land supply (this in turn reflects the fact that there has been significant recent and ongoing development (completions totaling 774 units between 2013-18). The proposed reduction potentially removes the need for green belt change in this area.
Principal Towns	The total level of housing reduces from 6,900 in the Core Strategy to 4,100 but this represents only a small reduction in the proportion of the district wide requirement (15.7% vs 16.4%). The updated data on deliverable and developable land supply is similar in the case of both Ilkley and Keighley to that at the time of Core Strategy adoption but significantly lower for Bingley.
Ilkley	Ilkley sees a halving of its target which slightly reduces its proportion of the district wide requirement from 2.4% to 1.9%. This also reduces significantly the level of green belt releases needed while still providing for a significant affordable housing contribution.
Bingley	The reduction in Bingley's target from 1,400 to 800 represents a similar proportion (around 3% of the district wide requirement). However land supply has fallen. The reduced target results in the potential to meet the target without green belt change but this is dependent on remaining non green belt supply being fully implemented.
Local Growth Centres	The total level of housing reduces from 4,900 to 2,600 (a small reduction from 11.6% of the district wide requirement to 9.9%).
Queensbury	Queensbury sees a substantial reduction from 1000 to 300 homes (a reduction from 2.4% to 1.1%) reflecting land supply, significant recent and ongoing development, green belt and other constraints.

Steeton	The target for Steeton falls from 700 to 150 (and a fall from 1.7 to 0.6% of the district wide requirement) reflecting land supply constraints, significant recent and ongoing development and the need to minimise green belt change.
Local Service Centres	All of the local service centres have seen reductions in their proposed targets. The higher targets are generally in those locations with deliverable and developable land supply in non-Green Belt locations.
Cottingley, East Morton & Oakworth	The CSPR proposes that no allocations are made in these settlements – in each case even a small target would result in the need for green belt change. However, windfall development in these locations could still come forward.

5.32.16 While it is important that the distribution is aligned in general terms to the areas of expected and greatest need, and to the areas where household growth is expected to be greatest, it is not possible or strategically desirable to use this as the sole means of determining housing targets. This is for the simple reason that distribution of deliverable and developable land supply and the geographical occurrence of significant environmental constraints does not necessarily match or reflect this ideal. Having said that the distribution set out in Policy HO3 is heavily focused on the larger urban areas and settlements within the District.

Preferred Option: General Principles

5.32.17 In the remainder of this section the key principles underpinning the settlement distribution are set out.

- firstly the general principles which have underpinned all of the work are outlined;
- secondly the production of a baseline distribution based solely on population within each settlement is described;
- thirdly the use of evidence which provided reality checking to adjust the baseline targets is described, and
- fourthly a brief description of the key factors relevant to the distribution within each tier of the settlement hierarchy is given.

1. Alignment with Core Strategy Vision and Objectives

The distribution of housing growth set out in Policy HO3 reflects both the Vision and Strategic Objectives of this Plan, in particular Objectives 1,2,5, 6 and 8. It aligns with and helps deliver the Council's key regeneration goals particularly those relating to the regeneration of the City Centre and the Canal Road Corridor. It supports the Council's aspirations to lever investment into the improvement of Holme Wood.

2. Alignment with the Settlement Hierarchy

The distribution of housing growth also reflects the settlement hierarchy defined within Section 3 of this Plan. Using the settlement hierarchy as a central element to the location strategy ensures that sustainability is embedded since the settlement

hierarchy directly reflects the nature and role of those settlements and the concentration of jobs, services, and public transport links within the higher order settlements.

3. Maximising the Benefits of Development and Growth

It is important that development and growth provides maximum benefits both direct and indirect to the local community. The distribution of development can play a role in a number of ways including the reclamation of derelict land, area based regeneration initiatives, securing investment for the improvement of existing neighbourhoods such as at Holme Wood, or supporting the retention of local services in smaller settlements and more rural parts of the district.

4. Minimising The Impact on Critical Environmental Assets

The District contains a rich variety of assets both within the rural and urban environments ranging from conservation areas and listed buildings to wildlife habitats and green infrastructure. It is therefore important that as far as possible and practicable the distribution of development assists the retention and conservation of these assets.

The Baseline Distribution – Population Proportionate Targets

- 5.32.18 Having determined the general principles underlining the distribution of housing growth the first stage in deriving settlement targets was to develop a base line distribution which could be then compared and reality checked against a range of criteria.
- 5.32.19 A population proportionate distribution was therefore produced. Using Census 2011 data and GIS software, an estimate was made of the population within the settlement boundaries of each town, village, or in the case of the regional city, quadrant. No attempt was made to assign population in rural areas outside these settlement boundaries.
- 5.32.20 The residual District-wide housing requirement of 26,150 (after allowing for clearance and windfall) was then assigned according to the proportion of population within each settlement. The housing distribution which would result from such an approach is indicated in Table HO3a below:

Table HO3a: Baseline Distribution of Housing Requirement Based Solely on Population

The Regional City of Bradford	17,594		
Bradford City Centre	182	Bradford NE	4,619
Shipley & Canal Rd Corridor	71	Bradford SE	3,030
Shipley	923	Bradford SW	4,903
		Bradford NW	3,865

The Principal Towns	4,180		
Bingley	913	Keighley	2,526
Ilkley	741		

Local Growth Centres	1,911		
Burley in Wharfedale	322	Silsden	393
Menston	225	Steeton with Eastburn	215
Queensbury	456	Thornton	300

Local Service Centres	2,466		
Addingham	163	Harden	82
Baildon	839	Haworth	300
Cottingley	246	Oakworth	196
Cullingworth	134	Oxenhope	96
Denholme	140	Wilsden	202
East Morton	67		

Adjustment of the Baseline Distribution Based on Evidence, Corporate Strategy & Regeneration Goals, Reality Checking and Appraisals

5.32.21 The baseline distribution would not produce a result which would necessarily reflect either the full range of general principles outlined above or the realities of land supply and environmental constraints. The key factors and evidence which were therefore used to adjust and finalise the housing distribution were as follows:

1. Land Supply (SHLAA)

The updated SHLAA provides data on not only the total deliverable and developable capacity within each settlement but also the nature of that supply including the split between greenfield and brownfield land and the amount of Green Belt. The SHLAA therefore provides the most critical element of the reality checking process.

2. Corporate Strategy & Regeneration Priorities

The distribution was also adjusted to reflect the range of current regeneration priorities and growth opportunities in the District. For example: the baseline

distribution reflects the relatively small centres of existing population and housing in the city centre and Canal Road corridor and therefore does not reflect the sustainable growth potential of these areas.

3. Minimising Green Belt Change & Sustainable Growth

Because the baseline distribution reflects neither the opportunities for growth indicated above or the detailed land supply picture it results in a greater scale on Green Belt change and fails to focus that change in the most opportune and sustainable locations. In line with both national policy and that within the existing Core Strategy the Council has analysed the implications for Green Belt for each of the reasonable alternatives and pursued an option which minimises overall Green Belt change and focuses that change in a sustainable way.

4. HRA and South Pennine Moors Birds and Habitats Surveys

A key stage in the plan making process is to assess how and whether the desired locational strategy would affect key areas designated for their wildlife and habitat value. The adopted Core Strategy, in particular policies SC8 and EN2a contain an approach to protecting such areas, in particular the South Pennine Moors SPA and SAC. The review of the housing distribution in Policy HO3 has taken this approach into account by limiting growth in areas which may have a significant impact on these designations. The policies in this revised Core Strategy including the revised Policy HO3 have been subject to analysis under the HRA.

5. Flood Risk and the Sequential Approach to the Distribution of Housing Growth

A key goal within the NPPF is that Local Plans should avoid development within the areas of highest flood risk and utilise a sequential approach to direct development to areas of lowest risk. This is reflected in the Core Strategy in a number of ways. Firstly, the SHLAA has, in line with the definitions within the NPPF, ruled as unsuitable any site falling within flood zone 3b, the functional flood plain. The Council has also assessed the distribution of remaining potential sites against flood zones 3a which is considered at high risk of flooding and flood zone 2 which is considered medium risk.

The overriding aim has been to set settlement targets at a level which will allow the site allocations process to steer development to areas of lowest risk, i.e. those designated as flood zone 1. However, initial site assessment work indicates that in order to meet the housing targets set out in Policy HO3, there may be some settlements which require development in areas currently identified as medium flood risk. As work on the Allocations DPD progresses, further detailed assessment will help to show the scale of development which may need to be accommodated in such areas. The proposed distribution has taken account of the balance in sustainability terms of minimising the need for development in areas of flood risk and the release of Green Belt land.

6. Other Factors – Maximising Previously Developed Land / Delivering Affordable Housing

The final stage in testing the housing distribution contained within Policy HO3 was a testing process to see if there were realistic variations on the option which would give better outcomes in terms of other key goals of the Core Strategy. By reference to the results of the SHLAA it can be confirmed that the settlement targets within Policy HO3 fully utilise all of the deliverable and developable previously developed land identified.

The Regional City of Bradford

5.32.22 Overall the proposed level of growth within the Regional City detailed below in Table HO3b lies slightly above the suggested baseline target and represents an increased concentration in this area as compared to that within the adopted plan. This is justified by a combination of the overall reduction in the district wide housing requirement and the level of potential land supply indicated in the updated SHLAA.

Table HO3b: The Regional City of Bradford

Area	HO3 Target	% of District Total	Difference from Baseline
The Regional City of Bradford	18,400	70.4	+806
Bradford City Centre	4,000	15.3	3,818
Shipley & Canal Rd Corridor	2,400	9.2	2,329
Shipley	400	1.5	-66
Bradford NE	2,000	7.6	-2,619
Bradford SE	3,100	11.9	70
Bradford SW	3,500	13.4	-1,403
Bradford NW	3,000	11.5	-865

5.32.23 There are however significant differences between the different parts of the Regional City. Bradford NE and SW have been assigned lower numbers than would be the case if the baseline targets were followed, largely due to land supply constraints in these areas. Conversely the master planning areas of the Shipley Canal Road Corridor and City Centre areas envisage the creation of new or significantly expanded housing concentrations in areas where the existing populations are low. The Bradford SE figure reflects the potential for a large urban extension at Holme Wood part of which would be delivered within the plan period and part beyond.

The Principal Towns

5.32.24 The proposed overall distribution to the Principal Towns detailed below in Table HO3c is close to that indicated within the baseline distribution. However, the housing targets for Ilkley and Bingley lie slightly below the baseline target while that for Keighley lies slightly above it. This reflects land supply, environmental constraints and the need to minimise Green Belt releases – the proposed distribution would potentially remove the need for Green Belt change around Bingley. It also reflects the need to provide a reasonable focus on the larger of the centres and that which has the most opportunity and requirement for regeneration.

Table HO3c: The Principal Towns

Area	HO3 Target	% of District Total	Difference from Baseline
The Principal Towns	4,100	15.7	-80
Bingley	800	3.1	-113
Ilkley	500	1.9	-241
Keighley	2,800	10.7	274

The Local Growth Centres

5.32.25 The Growth Centres are all locations which have been promoted to the third tier of the settlement hierarchy by virtue of their status as sustainable local centres and their role, function and accessibility to larger settlements such as Bradford, Keighley or Ilkley. They have a role in taking some of the development which would otherwise be allocated to the Regional City, to Keighley or to Ilkley. The proposed targets for the Local Growth Centres detailed in Table HO3d below reflect a balance between recognising their potential to accommodate some growth, the contribution that development can make to meeting housing need but also the need to reflect a number of environmental constraints. These include landscape and topography in the case of Queensbury and potential direct and indirect impacts on the South Pennine Moors SPA / SAC, and the 2.5km buffer zone around it, in the case of Silsden, Burley in Wharfedale and Menston. The distribution proposed has also reduced the overall amount and number of locations which would require Green Belt change. Development targets for Menston, Silsden and Thornton could all be met without the need for Green Belt.

Table HO3d: The Local Growth Centres

Area	HO3 Target	% of District Total	Difference from Baseline
Local Growth Centres			+689
	2,600	9.9	
Burley in Wharfedale	550	2.1	228
Menston	300	1.1	75
Queensbury	300	1.1	-156
Silsden	800	3.1	407

	Steeton with Eastburn	150	0.6	-65
	Thornton	500	1.9	200

Local Service Centres

5.32.26 The targets proposed for the Local Service Centres in Table HO3e lie on the whole well below the baseline targets and lower than the targets within the adopted Core Strategy. The Council considers that these are the least sustainable locations for growth within the District and development here should be focused more on meeting local needs and supporting local services. The only settlements where the targets lie a little above the baseline are for Cullingworth and Denholme which reflects the potential from existing sites and new redevelopment opportunities in these areas and their relatively strong performance in sustainability scoring within the growth study.

Table HO3e: Local Service Centres

	Area	HO3 Target	% of District Total	Difference from Baseline
	Local Service Centres	1,050	4.0	-1,416
	Addingham	75	0.3	-88
	Baildon	250	1.0	-589
	Cottingley	0	0.0	-246
	Cullingworth	150	0.6	16
	Denholme	200	0.8	60
	East Morton	0	0.0	-67
	Harden	25	0.1	-57
	Haworth	275	1.1	-25
	Oakworth	0	0.0	-196
	Oxenhope	25	0.1	-71
	Wilsden	50	0.2	-152

The Sub Areas - Summary

5.32.27 Table HO3f below indicates how the proposed distribution to the 4 sub areas compares to that which would result from the baseline distribution. It indicates that the regional city has a higher target than that in the baseline reflecting its status as the main centre and area where population growth and housing need are greatest. This is balanced by slightly lower distribution to Airedale and the Pennine Town and Villages.

Table HO3f: Summary

Area	HO3 Target	% of District Total	Difference from Baseline
The Regional City of Bradford	18,400	70.4 %	+806
Airedale	4,800	18.4%	-399
Wharfedale	1,425	5.4%	-27
Pennine Towns and Villages	1,525	5.8%	-381

5.32.28 Within sections C and D of Policy HO3 the Council indicates that will support proposals for windfall development in sustainable locations which accord with the policies of the Core Strategy. In particular windfall sites may provide opportunities to make additional contributions to meeting local housing need in the smaller settlements.

5.32.29 Within the District there are 12 designated neighbourhood areas. One of these, Burley in Wharfedale has a made Neighbourhood Plan. Most of the others are actively producing plans. While most are choosing not to allocate housing sites, should they choose to do so Policy HO3 will provide a housing requirement in most cases. All of the targets within Policy HO3 are minima and should the Parishes which are producing Neighbourhood Plans wish to promote more growth than that indicated in the Core Strategy the Council will support them provided that those proposals are sustainable and in accordance with national and strategic planning policies.

Policy HO3: Distribution of Housing Development

A. In accordance with the vision and spatial principles set out in this Plan, ~~the forthcoming Allocations, Bradford City Centre and Shipley & Canal Road DPD's will allocate~~ sufficient land will be allocated within the Local Plan and where appropriate Neighbourhood Plans to meet the residual housing requirement of at least 26,150 ~~42,100~~ for the District between April ~~2013~~ 2020 and April ~~2030~~ 2037. ~~This requirement will be apportioned as follows:~~

- ~~• 3,500 (8.3% of the District total) within the Bradford City Centre Area AAP;~~
- ~~• 3,100 (7.4% of the District total) within the Shipley & Canal Road Corridor AAP;~~
- ~~• 35,500 (84.3% of the District total) within the Allocations DPD.~~

B. The Apportionments between the different settlements and sub areas of the District will be as follows:

The Regional City of Bradford (~~18,400~~ 27,750) Divided as follows:

Bradford City Centre	<u>4,000</u> 3,500	Bradford NE	<u>2,000</u> 4,400
Shipley and Canal Road Corridor	<u>2,400</u> 3,100	Bradford SE	<u>3,100</u> 6,000
Shipley	<u>400</u> 750	Bradford SW	<u>3,500</u> 5,500
		Bradford NW	<u>3,000</u> 4,500

The Principal Towns (4,100 ~~6,900~~) Divided as follows:

Bingley	<u>800</u> 1,400	Keighley	<u>2,800</u> 4,500
Ilkley	<u>500</u> 1,000		

Local Growth Centers (2,600 ~~4,900~~) Divided as follows:

Burley in Wharfedale	<u>550</u> 700	Silsden	<u>800</u> 1,200
Menston	<u>300</u> 600	Steeton With Eastburn	<u>150</u> 700
Queensbury	<u>300</u> 1,000	Thornton	<u>500</u> 700

Local Service Centres (1,050 ~~2,550~~) Divided as follows:

Addingham	<u>75</u> 200	East Morton	400
Baildon	<u>250</u> 350	Harden	<u>25</u> 100
Cottingley	200	Haworth	<u>275</u> 400
Cullingworth	<u>150</u> 350	Oakworth	200
Denholme	<u>200</u> 350	Oxenhope	<u>25</u> 100
		Wilsden	<u>50</u> 200

C. The Council will take a positive approach in supporting additional development on windfall sites which accord with the policies of this plan, in particular those:

- i. Within the Local Service Centres which would provide affordable housing, or increase the range and choice of housing or meet a specific local need; and or
- ii. Which would re-use or improve vacant, derelict or under used land and buildings.

D. The Council will support proposals within Neighbourhood Plans which seek to provide for additional housing development over and above the levels indicated within this policy providing this additional growth can be achieved in a sustainable way and that proposed sites accord with the policies within this plan.

5.33 Reasonable Alternatives

5.33.1 The reasonable alternative to the proposed distribution:

1. Baseline Population Proportionate

This is detailed above and assigns targets based on the proportion of the existing population within that settlement area. Such a distribution would assign a greater proportion of the housing requirement to the Local Service Centres and would not utilise urban potential in the regional city. It would result in a substantially greater amount of green belt releases than the preferred option.

2. Adopted Core Strategy Proportions

This approach distributes the new lower district wide housing requirement in exactly the same proportions as in the adopted Core Strategy. It would lead to a larger release of green belt land than the preferred option spread among a larger number of settlements (19 vs 12).

3. No Green Belt Change

This provides a distribution which could be achieved on non-green belt land. If selected it would result in the plan failing to meet the housing requirement of the district in full.

4. No Green Belt Change with Density Uplift

This option utilises non green belt land and makes up the shortfall by making an assumption that significant uplift in yields (compared to current SHLAA assumptions) could be achieved.

5. Limited Green Belt Change – variant – intensification focused on regeneration priority areas

This is a variant on the preferred option but makes increases the distribution in certain areas such as the City Centre, Keighley and Bradford SE on the assumption that as yet unidentified potential might be realised via intensification and density uplift. If pursued and if found to be a realistic and deliverable option, it would reduce the scale and number of locations for green belt change compared to the preferred option.

6. Limited Dispersal

This is a variant of the preferred option which decreases the concentration on the regional city dispersing more development to the higher value areas of the district to the bottom two tiers of the settlement hierarchy. This would increase the overall scale of green belt releases and very significantly increase green belt releases in the Local Growth Centres and Local Service Centres.

Consultation Question 28

Preferred Option: Policy HO3: Housing Distribution

While Policy HO1 determines the total housing requirement for the district (26,150 new homes between 2020 and 2037) Policy HO3 determines how they will be distributed between the different areas, towns and villages. The preferred approach is to focus most growth on the urban areas where population and household growth is greatest, and where jobs, services and infrastructure are concentrated. It also reflects the scale and distribution of deliverable and developable land, environmental constraints such as wildlife, flood risk and heritage and the need to promote regeneration in certain areas.

The preferred option places
18,400 in the Regional City of Bradford (70% of total);
4,800 in Airedale
1,425 in Wharfedale and
1,525 in the Pennine Towns & Villages.

Q28. Please provide your comments for Policy HO3 and any suggested changes to the policy.

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.34 Preferred Option: Policy HO4: Managing Housing Delivery

- 5.34.1 The adopted Core Strategy Policy HO4 includes proposals for the phased release of housing land. The effect of this policy is to hold back a proportion of sites until later in the plan period and was considered necessary in the light of the scale of housing development proposed and the need to manage growth and change in a sustainable way. The policy indicated a range of criteria which would be used to determine which sites would be released from the outset and those which would be released later in the plan period including the need to achieve targets for delivery on brownfield land, to encourage regeneration, and to reflect infrastructure plans and programmes. However it was not a brownfield first policy and it was made clear that it was vital that the approach to the selection of sites within the two phases did not undermine overall delivery, the maintenance of a 5 year land supply and the delivery of a range and choice of sites.
- 5.34.2 The Council still considers it vital to manage housing growth in a sustainable way but there will be occasions where sites may need to be held back pending the implementation of other proposals such as essential infrastructure. It is now however considered that there is less justification for sites to be phased for a number of reasons. Firstly, the overall scale of housing delivery in the reviewed plan has been significantly reduced, in particular within the smaller settlements.

Secondly, the District has continued to see issues with regard to lower than required levels of housing delivery and the need to establish a five-year land supply. A more flexible approach which allows for sites to come forward where the market is able to deliver them (unless there are valid planning reasons to prevent this) would therefore be justified.

5.35.3 The Council is mindful of a number of further factors. Firstly, the need for developers to have a clearer picture of when land may become available and for infrastructure and service providers to be clear as to when development might occur. This certainty could enhance the prospects for securing investment and service improvements. Secondly, the need for larger sites to commence delivery as soon as practicable. The Council is required via its evidence base including its housing trajectory to show that its housing requirement will be met within the plan period. Delaying the commencement of development on larger sites could have the undesirable effect of extending their delivery beyond the end of the plan period and result, ironically, in more green field and Green Belt sites being allocated. Finally, the Council notes that while the need to manage growth in a sustainable way is reflected in Government Guidance there is no specific requirement to use a phasing policy to achieve this.

5.34.4 The revised approach to managing housing delivery is set out in Policy HO4 below. Using land supply and other aspects of the evidence base, the Council will identify where there may be constraints which may mean that sites either may or should be delivered later in the plan period or where it may be justified to hold back the release of sites. In some instances, this may relate to site constraints which are yet to be resolved, in others to on or off-site infrastructure issues. The Council is currently investigating and developing measures to improve air quality in parts of the district and there may be instances where sites may be held back based on the need for air quality improvement measures and interventions to be put in place.

Policy HO4: ~~Phasing the Release of~~ Managing Housing Delivery

A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the release of land within the Local Plan will be managed and phased where appropriate.

~~**B. The plan period will be split into 2 phases with phase 1 covering the first 8 years and the second phase the final 7 years of the plan period to 2030. The Allocations DPD will therefore need to allocate sufficient land to meet 8/15 of its housing requirement as specified in Policy HO3 with the first phase and 7/15 of its housing requirement within the second phase.**~~

C B. Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out within the Allocations DPD, but will be based on the following principles:

1. The need to have regard to delivering the overall housing requirement in line with Policy HO1;
 2. The need to maintain a 5 year supply of deliverable sites as required by the NPPF;
 3. The need to ensure that ~~within each phase~~ the sites allocated will provide for a range and choice of dwellings of different types, sizes and tenures ~~which will~~ to meet local need;
 4. The need to meet the targets for development on brownfield land as set out in this document;
 5. The need to prioritise and not undermine proposals for urban regeneration and the delivery of the area-based initiatives outlined in Policy HO2
 6. The need to ensure that the scale and timing of development within the different strategic planning areas of the District is co-ordinated with the provision of new infrastructure and the Council's corporate responsibilities for a safe and healthy environment.
 7. The need to ensure ~~an even a~~ delivery pattern within the smaller settlements and rural areas ~~where of sites are aimed at meeting~~ which meet local and affordable housing need over the whole period of the Local Plan.
- ~~D.C.~~ Consideration will be given to bringing forward large or complex sites where this would aid delivery in full in the plan period or where it would help to secure required investment and infrastructure;
- ~~E. The Council will maintain a five year supply (plus NPPF buffer) of deliverable housing sites through considering release of the subsequent phase of sites to help address any persistent shortfall.~~

5.35 Reasonable Alternatives

5.35.1 The main reasonable alternatives considered for Policy HO4 include:

- Delete the Policy as there is no requirement in the NPPF to phase sites – there is however still a need to ensure that sites are delivered in a sustainable manner
- Reduce the scale of the policy and focus upon PDL first – may lack a comprehensive overview

Consultation Question 29

Preferred Option: Policy HO4: Phasing the Release of Housing Sites

The Policy sets out how the Council will manage the delivery of the new homes required in the District. The policy has been updated to remove the section which refers to splitting the Plan period into 2 phases in favour of a focus on delivery and management of the supply to ensure infrastructure is provided.

Q29. Please provide your comments for Policy HO4 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.36 Preferred Option: Policy HO5: Density of Housing Schemes

- 5.36.1 The Council considers that a key component of sustainable housing growth is to ensure that land is used as efficiently as possible. The NPPF requires that where there is an existing or anticipated shortage in housing land that planning policies should avoid homes being built at low development densities. It advocates the use of minimum density standards particularly for city and town centres and other locations well served by public transport and that these standards should seek a significant uplift in the average density of residential development unless there are strong reasons why this would be inappropriate.
- 5.36.2 While adopted Core Strategy Policy HO5 has been successful in directing developers toward bringing forward schemes which make efficient use of land the Council have considered whether the policy could and should go further. In the main urban areas in particular, densities achieved on completed sites since 2013 and from current commitments have on average been higher than the minimum requirement of 30 units (net) to the hectare.
- 5.36.3 With the focus on regeneration, and in the context of a potential need to look to Green Belt locations for some of the district's development needs, it is important that in areas which are well served by public transport and local amenities that the Core Strategy ensures that densities are maximized in a sustainable way and that site efficiency continues through the Plan period, with low densities avoided.
- 5.36.4 As set out above, land availability assessment calculations forecast the number of homes which could in theory be delivered on sites and this forms part of the supply calculation. The calculations are derived from the SHLAA, whereby an appropriate density multiplier is selected for each site dependent on the site location, local character and any constraints to predict the net number of new homes likely to be achievable on the site. The lowest multiplier used is at a range of 30-40 units per

hectare, with an average of 35 units. As a consequence, the Council considers that this is an appropriate minimum requirement for the revised policy.

- 5.36.5 The new policy has also been redrafted to place greater emphasis on sites in well located areas, such as those with good access to public transport to further ensure that developers take appropriate steps when designing sites to provide a form of development which provides mixed development and provides an uplift in the number of homes which are provided.

Policy HO5: Density of Housing Schemes

~~A.~~ In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, developers will be expected to make the best and most efficient use of land.

This will mean delivering the most dwelling ~~houses~~ possible while taking account of the need to arrive at a well-designed layout which reflects the nature of the site, its surroundings and ~~given~~ provides the type and size of housing needed in the area.

A. All developments should achieve a ~~Densities should normally achieve at least a~~ minimum net dwelling density of ~~350~~ dwellings per hectare, ~~although higher densities and at least 50 dwellings per hectare net would be possible~~ in areas which are well served by public transport and local amenities.

B. Locations in and/or close to the City Centre and Principal Towns and locations close to railway stations should achieve significantly higher densities. ~~Centres~~

~~C. Detailed density targets applying to specific Sub Areas will be set out within the Allocations, Bradford City Centre and Shipley & Canal Road Corridor DPD's. This will include those areas where local character of the area would warrant lower densities or areas well served by public transport where higher densities may be required.~~

5.37 Reasonable Alternatives

- 5.37.1 The main reasonable alternative policy position identified reduces the requirement below 30 dwellings per hectare (dph) – monitoring of recent development and commitments has illustrated that the majority of developments have and are achieving net development densities over 30 dph – lower density schemes may result in the less efficient use of land which may result in the need for future additional land releases.

Consultation Question 30

Preferred Option: Policy HO5: Density of Housing Schemes

This Policy sets the Councils minimum density requirement for housing developments. The minimum policy threshold has been raised and strengthened, since the adopted Core Strategy and more emphasis has now been placed on higher development requirements in areas which are well located to amenities and public transport connections

Q30. Please provide your comments for Policy HO5 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.38 Preferred Option: Policy HO6: Maximising the use of Previously Developed Land

- 5.38.1 Within the NPPF the Government require that strategic planning policies ensure that as much use as possible is made of land which has been previously developed. Councils are encouraged to develop policies to promote and support the development of under utilised land and buildings, especially if this would help meet identified needs for housing where – as is the case in Bradford where land supply is constrained. There are a number of mechanisms available to Local Planning Authorities to ensure this takes place and in 2016 the Government introduced the requirement for Councils to publish and maintain a “Brownfield Register” of developable sites, appropriate for residential development. Another mechanism is to provide a Policy which supports developments which bring forward sites and buildings which have been previously used.
- 5.38.2 In recent years a significant proportion of all new homes have been provided on land which has been previously developed or in buildings which have been redeveloped. The Council has therefore reviewed adopted Policy HO6 to ensure that it gives the right level of priority to delivery on PDL which accords with the NPPF and to ensure that the delivery targets within it reflect the updated evidence base, including that on land supply.
- 5.38.3 In terms of the current land supply picture it has become evident that the scale and geographical spread of deliverable or developable brownfield sites has changed a little since the Core Strategy was adopted. The successful redevelopment of certain sites has resulted in a reduction in the availability of previously developed land in some areas and in response Policy HO6 has been revised to reflect the supply of

available land of this type. The overall District target however remains the same. This is to acknowledge the Council's aspirations to meet the strategic objectives of the Plan which seek further opportunities in the main urban areas- the "area based initiatives" referred to in Policy HO2 and to acknowledge the prospect that further windfall sites will continue to come forward throughout the Plan period, which will invariably be previously developed sites.

- 5.38.4 In reviewing the policy and resetting the targets the Council has also been mindful that previously developed sites can however be attractive to wildlife and left unused can quickly regenerate into valuable re-naturalized areas, which are a local asset to communities with limited access to other forms of open land. The NPPF recognises the need to protect such sites where they are of environmental value. New homes should be provided in safe and healthy environments and the impacts of the development should not adversely impact on designated sites of importance- such as areas important for wildlife.

Policy HO6: Maximising the Use of Previously Developed Land (PDL)

A. In order to meet both the objectives of delivering housing growth and managing that growth in a sustainable way, the plans, programmes and strategies of the Council will support ~~give priority to~~ the development of previously developed land and buildings.

This will mean achieving the maximum possible re use of ~~overall proportion of housing development~~ on previously developed land consistent with:

- 1. the deliverable and developable land supply;**
- 2. the need to maintain a 5 year land supply of deliverable sites;**
- 3. the need to coordinate development with infrastructure provision; and**
- 4. the need to maintain delivery of the scale and type of homes required throughout the plan period;**

B. District wide, at least 50% of total new housing development over the Plan period will be from on previously developed land and buildings.

C. In order to achieve the District wide target of 50%, the Allocations , ~~Bradford City Centre and Shipley and Canal Road~~ DPD's will ~~should~~ bring forward land and manage its release so as to deliver the following proportions of housing development on previously developed land:

- In the Regional City of Bradford 55%**
- In the Principal Towns ~~50~~ 35%**
- In the Local Growth Centres ~~15~~ 20%**
- In the Local Service Centres ~~35~~ 25%**

D. The Council will monitor performance against these targets and will take action if performance slips outside of the defined acceptable ranges. ~~as set out in the housing implementation framework.~~

5.39 Reasonable Alternatives

- 5.39.1 Preferred Option – Review the remaining land supply and revise the requirement and proportions for each tier of the settlement hierarchy based on what is currently known and “expected” to come available. No reasonable alternatives identified.

Consultation Question 31

Preferred Option: Policy HO6: Maximising the Use of Previously Developed Land

This policy sets the Councils target for the proportion of new homes which will be built on sites which have been previously developed. There is no change from the District target of 50%, but the proportions for all but the regional city of Bradford tier of the settlement hierarchy have been revised to bring them in line with the housing land supply.

Q31. Please provide your comments for Policy HO6 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

Policy HO7: Housing Site Allocation Principles – NOT UNDER REVIEW

5.40 Preferred Option: Policy HO8: Housing Mix

- 5.40.1 Housing choice is essential in meeting the wider housing needs of the District. Sustainable mixed communities require a variety of housing in terms of size, type, tenure and price to meet the needs of different households. A key objective is to ensure that planned housing growth will deliver a mix and balance of housing, which meets the future needs of the District’s population and household growth.
- 5.40.2 The NPPF (2019) states that there are a range of household groups who have particular housing requirements. It sets out that the needs of different groups should be assessed and reflected in planning policy in terms of the size, type and tenure of housing. To deliver a wide choice of high-quality homes and create sustainable, inclusive and mixed communities, the Core Strategy will plan for a mix of housing based on demographic and market trends and the needs of different groups in the

District. The SHMA (2019) identifies evidence of the need and demand for housing and the needs of different groups in the District.

- 5.40.3 In summary, evidence indicates that there is an ongoing need for all types and sizes of dwellings. The delivery of houses remains a priority, with an increasing emphasis on the need for flats and bungalows/level access accommodation. Strongest need is for two and three bedroom dwellings with continued need for one and four bedroom dwellings. The number and proportion of older person households is predicted to significantly increase over the plan period. A major strategic challenge for the Council is therefore to ensure that the housing and support needs of older people are met going forward. The SHMA identifies a need for additional specialist older persons housing (C3) and residential care units (C2) to 2037. The SHMA does not specify the precise nature of specialist older person dwellings to be built. This is to allow flexibility in delivery. A key conclusion of the SHMA (2019) is that there needs to be a broader housing offer for older people across the district and the SHMA has provided evidence of scale and range of dwellings needed.
- 5.40.4 The preferred option has updated Policy HO8 to ensure that it is in line with the latest evidence of housing need and demand and will ensure that new residential development provides for a range of housing types, in line with the revised NPPF. The strategic housing priorities in the adopted Core Strategy policy are considered to remain appropriate based on the latest evidence and that it is considered appropriate to maintain a flexible approach to housing mix on a site by site basis informed by latest evidence in the SHMA and other local evidence of need and demand. The preferred option also includes new policy criteria to support and encourage custom and self-build housing to meet identified local demand in line with the revised NPPF and duties under Self Build and Custom Housebuilding Act 2015 and the needs of other specialist housing groups with specific needs.

Policy HO8: Housing Mix

A. The council will ensure that a mix and balance of housing is provided to meet the needs of the District's growing and diverse population.

B. All ~~large~~ major residential development sites where 10 or more homes will be provided or the site has an area of 0.5 hectares or more will be expected to incorporate a mix of housing types, sizes, prices and tenures. The exact mix should be based both on market demand and evidence of local need within the District's SHMA together with any other robust local evidence or information. The location and nature of the site and its surroundings and the profile of the existing stock in the area should also be considered.

C. Specific guidance on housing mix on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans.

D. Within the District there will be a need for all types and sizes of housing but there should be a particular emphasis of the following strategic

priorities:

1. **Delivering more family housing across the District;**
2. **Delivering sufficient affordable housing in accordance with Policy HO11 and meeting the needs of people on lower incomes and first-time buyers;**
3. **Increasing the supply of larger homes across the District, particularly in areas suffering from high levels of overcrowding;**
4. **Increasing the supply of accessible housing which is able to meet people's needs throughout their lives;**
5. **Increasing the supply of high quality flats, particularly in city and town centres and accessible locations;**
6. **Supporting the provision of specialist accommodation for older people to meet identified needs in suitable locations and in areas of greatest demand.**

E. The council will encourage and support proposals for self and custom build housing to meet identified local demand where they are in conformity with all other relevant local and national policies, including through identifying opportunities and sites where suitable and available, through the Allocations DPD and Neighbourhood Plans.

F. The council will support and encourage proposals that meet an identified local need for specialist housing for particular groups with specific needs where clearly justified by robust evidence and in line with all other relevant local and national policies. The council will seek to meet any identified needs where possible through the Allocations DPD and Neighbourhood Plans.

5.41 Reasonable Alternatives

5.41.1 The reasonable alternatives considered:

- Reasonable Alternative 1: Set out specific percentages for the housing mix and the need, type and location of specialist housing for older people on a District or sub area basis.
- Reasonable Alternative 2: Require a proportion of larger sites to include plots for custom self-build plots.

Consultation Question 32

Preferred Option:

Policy HO8: Housing Mix

Self-build and specialist accommodation needs criteria added to the policy.

Q32. Please provide your comments for Policy H8 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.42 Preferred Option: Policy HO9: Housing Quality

- 5.42.1 A key objective for the District is to ensure that new housing creates popular neighbourhoods with high standards of quality and design. It is important that new housing is designed to create high quality places where people aspire to live, which supports strong communities and healthy lifestyles, and responds to the impacts of climate change. Delivering a sufficient supply of high-quality housing is critical to supporting economic growth and facilitating a low carbon economy. Policy HO9 will help ensure that housing developments are of high quality and contribute to inclusive built environments in the District in support of Policy SC1.
- 5.42.2 The revised NPPF sets out that good design is a key aspect of sustainable development and that Local Plans should set out a clear design vision and expectations for good design. The council has prepared a Supplementary Planning Document (SPD) entitled *Homes and Neighbourhoods: A Guide to Designing in Bradford* which provides clarity about design expectations and a framework for implementing Policy HO9 and helps to ensure that new housing will create places, with a high quality standard of design and healthy communities in Bradford.
- 5.42.3 The NPPF requires the Council to have a clear understanding of housing needs in their area, including those for people with specific housing needs and to set policies to meet these needs. This includes policies requiring optional technical standards for space standards and accessible homes. In line with the PPG these policies should be based on clear evidence of both need and viability.
- 5.42.4 The Bradford SHMA (2019) and Housing Research Evidence of Need and Viability (2016) provide evidence of the need for accessible and adaptable housing and minimum space standards for new housing, which has been used in formulating the revisions to policy HO9. The evidence identifies a need and demand for accessible housing resulting from an ageing population in the District and levels of disability

amongst the population. The evidence also highlights specific local issues with regards to overcrowding and the need for larger family housing, the quality, age and adaptability of the current housing stock and public health issues. From the evidence it is considered that there is a clear need for accessible and adaptable homes and homes built to suitable space standards that justifies the inclusion of a policy in the Local Plan for setting optional technical standards exceeding the minimum standards required by Building Regulations.

- 5.42.5 The preferred option has updated Policy HO9 to ensure that it is in line with the latest evidence of need and the revised NPPF in relation to design and housing standards. The revised Policy HO9 sets out minimum acceptable standards for internal space standards and optional technical standards for accessible and adaptable housing and criteria to be considered in the design of new residential development. All new build homes will be expected to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Larger sites of ten dwellings or more should include at least 10% of dwellings that meet requirement M4(3) 'Wheelchair user dwelling' of the Building Regulations. Where affordable housing is required on site this requirement is split between the market and affordable homes. Part M of the Building Regulations sets a distinction between wheelchair accessible and wheelchair adaptable dwellings. In most cases it is expected that market housing and affordable dwellings provided through planning requirements will be wheelchair adaptable. Only where the Council is allocating or nominating a wheelchair user as an occupier will be wheelchair accessible dwellings be required.
- 5.42.6 The standards set out in Policy HO9 will be assessed as part of the Whole Plan Viability Study. This will include the impact of minimum space standards, and accessibility standards. The standards in Policy HO9 are therefore currently set at a level to meet need anticipated need and are subject to viability to respond to individual site circumstances. This will ensure that site specific factors such as vulnerability to flooding, the topography of the site or other circumstances which may make a site less suitable for accessible dwellings will be taken into account, particularly where step free access cannot be achieved or is not viable.

Policy HO9: Housing Quality

A. New housing development should be high quality and achieve good design. Residential development assessed to be of poor design will be refused permission. The Homes and Neighbourhoods Design Guide SPD identifies how the quality of residential development proposals will be assessed.

B. The Council will encourage and support new residential developments to achieve high sustainable design and construction standards. The minimum acceptable sustainable housing standards are set out in the Building Regulations.

C. To provide suitable housing and genuine choice for the District's diverse population ~~Larger~~ housing sites should include a proportion of new homes which are designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including older people and people with disabilities.

1. New build residential developments should include the following proportions of accessible homes:

- All new build dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- On major development sites over 0.5 hectare or 10 or more homes 10% of dwellings should meet the Building Regulations requirement M4(3) 'wheelchair user dwellings', designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

2. Where it can be robustly justified that site-specific factors, such as flood risk, site topography or viability make a site unsuitable for either M4(2) and/or M4(3) compliant homes the requirements of this policy should not apply.

3. The mix of sizes, types and tenures of accessible housing should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional accessible housing in a particular tenure).

4. The required number and mix of accessible homes should be clearly illustrated on submitted plans and controlled via a planning condition.

D. New development should provide private outdoor space for homes, unless site constraints make this clearly unfeasible and/or unviable.

E. All ~~N~~new homes should be well laid out internally and should provide suitable space standards appropriate to the type of home. Rooms should receive adequate levels of daylight.

1. All new market and affordable homes should, as a minimum, meet the Nationally Described Space Standard (NDSS) for internal space in new dwellings.

2. Proposals for change of use, student accommodation and houses in multiple occupation will not be subject to the NDSS. Such development, however, should reflect the NDSS with appropriate adjustments to address the particular characteristics of these types of development. They should also meet standards of general amenity for occupiers to include adequate space, light and ventilation.

E.F. New development should provide well designed ~~adequate~~ storage solutions for bins, recycling and cycles. These should be located or

designed in a way which is **both** convenient for all residents including elderly and infirm and supports the quality of the street scene. The council will encourage the use of new and innovative waste collection systems including underground bin systems where appropriate and feasible. In particular on larger strategic sites and developments of 1000 properties or more or for high density developments.

F.G. Specific non-strategic policies and guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs, The Homes and Neighbourhoods Design Guide SPD and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so and reflect the relevant national technical standards.

5.43 Reasonable Alternatives

5.43.1 The reasonable alternatives considered:

- Reasonable Alternative 1: Maintain current policy approach of requiring a proportion of homes on larger site to be accessible but not setting out the detailed requirement in relation to optional technical standards.
- Reasonable Alternative 2: Do not require optional technical standards for housing.

Consultation Question 33

Preferred Option: Policy HO9: Housing quality

The Preferred Option makes reference to the updated housing need evidence and the Housing Design Guide SPD and identifies targets for optional technical standards required from new development consistent with the revised NPPF.

Q33. Please provide your comments for Policy HO9 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

Policy HO10: Overcrowding and Empty Homes – NOT UNDER REVIEW

5.44 Preferred Option: Policy HO11: Affordable Housing

- 5.44.1 Access to affordable housing is a major issue in the District. Inaccessible home ownership and housing benefit reform is making housing less affordable for many households. One of the Council's strategic aims is to ensure an adequate supply of affordable homes to buy or rent that match household incomes, build sustainable neighbourhoods by ensuring that new homes of the right type are built in the right location, and to support the economy by new home building and ensuring homes remain affordable.
- 5.44.2 Policy HO11 will aim to ensure that a sufficient supply of good quality affordable housing is delivered to meet the affordable housing needs of the District. Policy HO11 supports Core Strategy Objectives 2, 4 and 10.
- 5.44.3 The scale of affordable requirements has been assessed in the SHMA (2019) in line with NPPG requirements using latest household survey evidence. The overall net annual imbalance is indicated to be around 441 affordable dwellings each year. This represents approximately 25% of the Local Housing Need figure of 1703. The scale of affordable housing need in relation to the total housing need is broadly similar to the adopted Core Strategy, which estimates an overall net annual requirement for approximately 587 new affordable homes and a district-wide affordable housing target of 20% to 25%. Evidence in the latest SHMA therefore justifies the continuation of a robust affordable housing policy across the District.
- 5.44.4 The SHMA also recommends a tenure split of 65% rented and 35% intermediate tenure (affordable home ownership products). This tenure split is based on local evidence of identified need and affordability. This is considered a material factor when implementing Para 64 of the NPPF that requires 10% of all housing to be for affordable home ownership on major developments unless this would significantly prejudice the ability to meet identified affordable housing needs. While the Council supports affordable home ownership as part of the affordable housing mix, providing such a level could severely restrict the delivery of other tenures needed, especially in the urban areas which currently only requires a 15% affordable housing contribution overall. In some circumstances this may not be an issue, however this will need to be considered on a site by site basis based on evidence in the SHMA, the site characteristics and local demand for affordable products. The tenure split set out in Policy HO11 will therefore continue to be used as a starting point for negotiations in the implementation of planning applications.
- 5.44.5 The preferred option has updated Policy HO11 to ensure that it is in line with the latest evidence of need and the revised NPPF in relation to thresholds for affordable contributions and types of affordable housing required. The affordable housing targets as set out in criterion B are considered to remain valid in relation to the overall need identified in the latest SHMA and will be tested further through the Whole Plan Viability Study alongside the CIL review and other Local plan policies. The updated policy also includes new criteria for assessing speculative proposals for rural exceptions via planning applications.

Policy HO11: Affordable Housing

A. The council will work with partners to ensure that there is a sufficient supply of good quality affordable housing distributed throughout the District, particularly in the areas of highest need.

B. ~~Subject to viability, the Council~~ On major residential developments, affordable housing provision that meets identified local needs should be provided at the target levels specified below: will negotiate for up to the following proportions of affordable housing on residential developments:

- ~~Up to~~ 30% in Wharfedale
- ~~Up to~~ 20% in towns, suburbs and villages
- ~~Up to~~ 15% in inner Bradford and Keighley

Affordable housing should be provided on-site and be indistinguishable from and well-integrated with market housing, unless off-site provision or a financial contribution in lieu of on-site provision can be robustly justified and would support the creation of inclusive and mixed communities.

C. Affordable housing contributions will be required on all major developments of 10 15 or more homes or on sites over 0.5 hectares in area. ~~The site size threshold is lowered to 11 units or more in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley.~~

D. The Council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability. The following tenure mix will be the starting point for all affordable housing negotiations:

- 65% affordable housing for rent
- 35% affordable home ownership products

E. Where an applicant can provide robust, up to date and verifiable evidence to support the view that a site would be unviable if affordable housing targets are required then the exact amount of affordable housing, or financial contribution to be delivered, will be determined by economic viability having regard to individual site ~~and market~~ conditions.

Rural Affordable Housing

F. Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.

G. The criteria for assessing speculative proposals for rural exceptions via planning applications ~~will be set out in the Allocations DPD and~~ will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the ~~g~~Green ~~b~~Belt.

Proposals will be supported where:

1. The scheme meets a proven local need for affordable housing that cannot be accommodated in any other way.
2. The scheme is community led or can demonstrate significant support from the local community.
3. It would not undermine the purposes of the Green Belt in that area.
4. It is immediately adjacent the settlement or forms a small-scale natural extension to it.
5. The affordable housing is required to remain affordable 'in perpetuity' and prioritises the allocation of housing for local needs.

5.45 Reasonable Alternatives

5.45.1 The reasonable alternatives considered:

- Reasonable Alternative 1: Require affordable housing targets below current policy.
- Reasonable Alternative 2: An alternative approach to the tenure split and types of affordable housing required

Consultation Question 34

Preferred Option: Policy HO11: Affordable Housing

The Preferred Option makes reference to the updated housing need evidence and identifies targets, thresholds and types of affordable housing required consistent with the revised NPPF.

Q34. Please provide your comments for Policy HO11 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.46 Preferred Option: Policy HO12: Sites for Travellers and Travelling Showpeople

- 5.46.1 The national Planning Policy for Traveller Sites (PPTS) (updated in August 2015), requires an assessment of the current needs of Gypsies and Travellers and Travelling Showpeople and a projection of future needs. An updated Gypsy and Traveller and Travelling Showperson Accommodation Assessment has been undertaken as part of the update to the SHMA (2019). This provides latest available evidence to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople across the District. In summary, this identifies that across the district there are 52 Gypsy and Traveller pitches and 37 households. In terms of Gypsy and Traveller site provision, in Bradford District there are two Council sites and two private permanent sites. There is also one Travelling Showpersons' yard. The two largest sites are at Esholt (total capacity 19 pitches) and Mary Street (total capacity 28 pitches). There are currently 14 vacant pitches on Council sites, 11 at Esholt and 3 at Mary Street.
- 5.46.2 A major change in planning policy, introduced by PPTS 2015, was to amend the definition of both 'Gypsy and Traveller' and 'Travelling Showperson' to exclude, for planning purposes, anyone who has stopped travelling on a permanent basis. It continues to include those who have ceased to travel temporarily. This created a more restricted 'PPTS 2015' definition which applies to those who follow a nomadic habit of life. The GTAA evidence therefore expresses two levels of need for pitches: a 'cultural' and 'PPTS' need. This is to ensure that the overall needs of the Travelling community are fully reflected in the evidence base which needs to accord with planning and wider policies.
- 5.46.3 Other groups of travellers may also be able to demonstrate a right to culturally appropriate accommodation under the Equality Act (2010). In addition, provisions set out in the Housing and Planning Act (2016) include a duty for local authorities to consider the needs of people with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. The housing needs of Gypsy and Traveller Households who do not meet the planning definition of a Traveller will therefore also need to be assessed as part of the wider housing needs of the area. The revised Policy HO12 below should be read alongside Policy HO8 which relates to the mix of housing need within the district and making provision for a range of specialist accommodations types to meet identified local need.
- 5.46.4 The latest evidence in the GTAA (2019) indicates over the plan period a cultural need of 17 pitches and a PPTS need for 10 pitches. It is anticipated that turnover at existing sites may address the needs outlined in Table HO8, however because turnover cannot be guaranteed to take place, the GTAA (2019) recommends that the Council should prudently plan for a PPTS need of 10 pitches over the plan period.

- 5.46.5 The GTAA has not evidenced any need for additional Travelling Showperson plots. This is a significantly different finding to the previous assessment, however the number of households living on the existing yard has reduced from 42 (as reported in the 2015 GTAA) to 18 and it is considered that there is sufficient space for the needs of the Travelling Showperson community in the district.
- 5.46.6 The preferred option for Policy HO12 will aim to ensure that a sufficient supply pitches is delivered to meet the needs of gypsy and travelers and travelling showpeople in the District and appropriate criteria are included for allocating sites and determining planning applications. The Council will allocate land for Gypsies, Travellers on the basis of the identified needs above through the Site Allocations Plan. The policy also identifies a need to consider the development transit pitches to address the short-term accommodation needs of households travelling through the District. It is proposed to delete reference to rural exception sites within the policy. This is considered justified on basis of the reduced level of overall need identified in the latest GTAA and that the District does not contain any designated small rural settlements in line with the PPTS (2015, paragraph 15 footnote 6).

Policy HO12: Sites For Travellers and Travelling Showpeople
Meeting Future Need

A. In order to meet the accommodation needs of Gypsies and Travellers

†The Council will make provision via policies and site allocations to deliver at least the following number of additional pitches ~~for Gypsies and Travellers and plots for Travelling Showpeople~~ for the period to 2037:

- **10 ~~39~~ pitches for the gypsy and traveller communities;**
- **5 ~~7~~ pitches for transit accommodation to address the short-term accommodation needs of households travelling through the District;**
- ~~45 pitches for travelling showpeople~~

B. The Allocations DPD ~~and Shipley & canal Road AAP~~ will ~~in combination~~ allocate sufficient sites to deliver this requirement in sustainable and accessible locations which meet the needs of local communities. Should it be determined that Exceptional Circumstances exist then any alterations to the Green Belt boundary to accommodate pitches will be considered through the Allocations DPD.

C. The general location principles for allocating sites for development through the Allocations DPD are set out in Policy SC5. The Council will work closely and constructively with the neighbouring councils, the traveller and showperson's communities and the settled community to identify the most appropriate sites which will offer locations and accommodation which are both sustainable and meet the needs of the travellers and showpeople;

D. All sites ~~which are developed or~~ proposed for allocation and planning applications for the gypsy and traveller and travelling showpeople communities ~~will should~~ be assessed against the following criteria relating to:

- Safe and appropriate access to the highway network
- Whether they are or can be served by utilities or infrastructure;
- Whether they are accessible to services, amenities and public transport;
- The avoidance of significant adverse effects on the environment and adjacent land uses; **and**
- The Suitability of the land: Sites should not normally be located on land that is deemed unsuitable for general housing, such as land that is contaminated or adjacent to bad neighbour uses;
- Incorporating appropriate design and landscaping standards;
- Avoiding areas at high risk of flooding;

E. ~~Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.~~

F. Planning applications for proposals within the Green Belt will only approved if very special circumstances can be demonstrated. The considerations which will be used in ~~criteria for~~ assessing ~~speculative such~~ proposals ~~for rural exceptions via planning applications~~ will include the following:

- Whether there is evidence of a specific and unmet locally identified need.
- The availability of existing provision, in particular any spare capacity on existing sites, and whether there are any alternative suitable and deliverable sites for Gypsies and Travellers and Travelling Showpeople in non-Green Belt locations;
- Ensuring that ~~be set out in the Allocations DPD and will give~~ priority is given to protecting the most sensitive sites and avoiding development which ~~those areas of land where development~~ significantly undermine the openness of the green belt.
- The incorporation of appropriate landscape proposals to mitigate any harm to the green belt and that have a positive influence on the quality and amenity of the development;
- Any permission granted for a Gypsy and Traveller development will be subject to a condition limiting occupation to Gypsies and Travellers, as appropriate.

5.47 Reasonable Alternatives

5.47.1 The Reasonable Alternatives considered are:

- Alternative 1: Require pitch targets for the full cultural need over the plan period.
- Reasonable Alternative 2: Plan for a lower or zero pitch target on the basis of turnover addressing supply.

Consultation Question 35

Preferred Option: Policy HO12: Sites for Travellers and Travelling

The Preferred Option makes reference to the updated need evidence and identifies targets for the identification of additional pitches to meet need over the plan period and identifies criteria for assessing sites and planning applications consistent with the revised NPPF and national planning policy for traveller sites.

Q35. Please provide your comments for Policy HO12 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

SECTION 5

Thematic Policies: Environment



Section 5 Environment

5.48 About

- 5.48.1 The environment section focuses on the protection and enhancement of environmental assets and on the use of resources. The Bradford District has an impressive range of heritage assets, areas of different landscape character and distinctive habitats of wetland, woodland and upland. Policies relating to minerals and energy seek to address the use of the District's natural resource, whilst policies relating to environmental protection set parameters to manage the impacts on air, land and water.
- 5.48.2 This section of the plan sets out the preferred option for updates to policies relating to:
1. Biodiversity
 2. Trees and Woodland
 3. Energy
 4. Flood Risk
 5. Environmental Protection
- 5.48.3 The Government has set out its ambition for the protection of the environment in the 25 Year Environment Plan. This covers a range of issues including: clean air; clean and plentiful water; thriving plants and wildlife; reducing the risk of harm from environmental hazards; using natural resources sustainably, enhancing beauty, heritage and engagement with the natural environment; mitigating and adapting to climate change; minimising waste; managing exposure to chemicals and enhancing biosecurity. The policies in the Core Strategy aim to reflect these national priorities, ensuring that improvements are made to the environment of the Bradford District.
- 5.48.4 The revised NPPF has also strengthened the policy approach for the protection and enhancement of biodiversity by requiring that opportunities for securing measurable net gains for biodiversity are pursued. The forthcoming Environment Act will set out in more detail the requirements for biodiversity net gain in new developments.
- 5.48.5 In addition there has been a recent resurgence in the urgency attached to tackling environmental issues such as climate change and species extinction. The report of the Committee on Climate Change indicates that the UK should adopt a new emissions target of net-zero greenhouse gases by 2050. Bradford Council amongst a number of other local authorities have declared a climate emergency and it is clear that action needs to be taken now to halt global warming and ensure that our biodiversity resources are maintained and improved.

5.49 What you told us

- 5.49.1 The initial scope of the CSPR only considered possible minor changes to some of the environmental policies, updating them to reflect changes in national policy and an updated local evidence base. However, a number of comments relating to the environment section of the plan were received as part of the scoping consultation and these have been considered as part of the drafting of the Preferred Option report.
- 5.49.2 The comments included support for strengthening the environmental policies to bring them in line with national policy (specifically the 25 Year Environment Plan). In particular there was support for the inclusion of a biodiversity net-gain policy which would set out criteria for achieving net-gains of biodiversity in new developments. There was also support for the identification and enhancement of ecological networks.
- 5.49.3 Comments received relating to trees and woodland requested that Plantation Ancient Woodland is included within the definition of ancient woodland as set out in Policy EN5.
- 5.49.4 In terms of renewable energy, the comments received recommended that Policy EN6 should identify suitable areas and opportunities for renewable energy provision and provide more specific planning detail on climate change and emission targets.
- 5.49.5 Responses relating to environmental protection indicated that an additional policy should be included to look at water resource issues such as water shortages, drought and to provide further details relating to the requirements of the Water Framework Directive.

5.50 Findings and Policy Directions

- 5.50.1 The updated policies in the Environment Section have been influenced by newly available evidence at the local level, changes in policy at the national level and consultation responses from the CSPR scoping report. Some of the key findings from the evidence and the resulting policy directions/changes are outlined below.
- 5.50.2 The West Yorkshire Ecology Service (WYES) has carried out a programme of updating and combining Sites of Ecological and Geological Importance (SEGIs), Regionally Important Geological Sites (RIGS) and some of the Bradford Wildlife Areas (BWAs) into one system known as Local Wildlife Sites (LWS) and Local Geological Sites (LGS). As part of this process each site has been reviewed to assess their continued nature conservation value. This new designation system forms the third tier in the hierarchy of protected sites for nature conservation as outlined in Policy EN2a. In addition, the WYES has also identified and mapped a series of ecological networks for grassland, woodland and wetland habitats. In line with the requirements of the NPPF, the revised Policy EN2a includes these areas as a new fourth tier in the hierarchy of protected sites. These areas provide the links

and stepping-stones between the designated sites. These ecological networks will be shown on the Policies Map as part of Allocations DPD.

- 5.50.3 The NPPF now requires plans to identify and pursue opportunities to deliver measurable net gains for biodiversity. This has resulted in the preparation of a new policy (EN2b) which specifically addresses biodiversity in new developments and sets out the mechanism for securing net gains. Increasingly there is a focus on the social impacts of providing biodiversity net gains and these have also been considered and addressed in this new policy.
- 5.50.4 The new Level 1 SFRA for the District provides an update to the defined functional floodplain (flood zone 3b) which will be an important consideration at the site allocation stage and in applying the sequential and exception tests. Policy EN7 has been strengthened to introduce the drainage hierarchy and provide further details on surface water run-off rates and the use of Sustainable Drainage Systems (SuDS).
- 5.50.6 Bradford District suffers from poor air quality in some areas as a result of traffic and congestion. A recent Ministerial Direction requires the Council to prepare an Air Quality Plan to achieve air quality compliance in the shortest time possible. Policy EN8 together with updated transport policies supports the requirement to improve air quality and ensures that new development does not exacerbate existing problems.
- 5.50.7 Water quality is also a key issue in parts of the District and the Environment Agency has indicated that additional details relating to water resources and the Water Framework Directive should be included in the Partial Review. Policy EN8 has been updated to support developments which help to achieve 'good' ecological status of surface and groundwater bodies, manage water demand and improve water efficiency.

Policy EN1: Protection and improvements in provision of Open Space and Recreation Facilities – NOT UNDER REVIEW

5.51 Preferred Option: Policy EN2a: Biodiversity and Geodiversity

- 5.51.1 Biodiversity is the widespread term for biological diversity, which represents the richness and variety of plants, birds, animals and insects. In recent years, concerns about biodiversity have increased. It is recognised that without this variability in the living world, ecological systems and functions could break down, with detrimental consequences for all forms of life.
- 5.51.2 There is a range of habitats within the District including substantial areas of upland heathland, blanket bog, woodlands, valley wetlands and unimproved grasslands. The demand for development on the lower-lying Coal Measures has fragmented these habitats, although unique habitats have also been created throughout the District as by-products of industrialisation, such as reservoirs, canals and quarries.

- 5.51.3 The South Pennine Moors represent a significant proportion of heathland in England and show exceptional diversity compared to other examples in the European Union. As a Special Protection Area (SPA) and Special Area of Conservation (SAC), the South Pennine Moors are protected under the European Habitats Directive and the European Birds Directive because they contain habitat types which are rare or threatened, and due to the importance of the breeding bird populations.
- 5.51.4 The planning system is required to contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity, contributing to the government's commitment to halt overall decline in biodiversity and establishing coherent ecological networks that are more resilient to current and future pressures. Distinctions should be made between the hierarchy of international, national and locally designated sites. The NPPF makes it clear that plans should seek to allocate land with the least environmental or amenity value.
- 5.51.5 Since the adoption of the Core Strategy there have been a number of changes in terms of the way sites are designated and the policy approach to biodiversity and development.
- 5.51.6 There are currently four levels of designated sites within Bradford District ranging from sites of international importance to those of local nature conservation value. Since the adoption of the Core Strategy, Sites of Ecological/Geological Importance (SEGI), Regionally Important Geological Sites (RIGS) sites and some Bradford Wildlife Areas (BWA) have been combined into one system known as Local Wildlife Sites (LWS) and Local Geological Sites (LGS) Sites.
- 5.51.7 A regional Local Wildlife Network (LWN) has also recently been identified by West Yorkshire Ecology in relation to grassland, woodland, wetland and heathland networks connecting designated sites of biodiversity and geological importance and notable habitat links. The creation of the LWN is intended to prevent further fragmentation of ecological resources within the district and to adjoining authorities.
- 5.51.8 In addition, there is an increasing emphasis on providing net gains for biodiversity in the revised NPPF (2019) and also the 25 Year Environment Plan (2018). The Government has confirmed that the forthcoming Environment Bill will mandate 'biodiversity net gain'. The NPPF states that planning policies and decisions should 'contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity'. Whereas plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'. Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development. They must assess the type of habitat and its condition before submitting plans, and then demonstrate how they are improving biodiversity. Although at early stages, attention is also turning internationally to the individual well-being and community implications of applying

bio-diversity net gain, so that project impacts and benefits are understood for both wildlife and people³.

- 5.51.9 The review of Policy EN2 has taken into account the changes to the hierarchy of designated sites and the increased focus on biodiversity net gain. For clarity, the decision has been made to divide the policy into two separate policies: EN2a (Biodiversity and Geodiversity) and EN2b (Biodiversity and Development).
- 5.51.10 Policy EN2a (Biodiversity and Geodiversity) seeks to protect and enhance biodiversity and geodiversity within the District, setting out the hierarchy of protected sites and identifying principles for enhancing the overall biodiversity resource.

Policy EN2a: Biodiversity and Geodiversity

The Council will promote the protection, enhancement, restoration and expansion of biodiversity and geodiversity in the district, recognising the importance of a coherent network of designated sites, from international to local, and the function that wider biodiversity and geodiversity plays in supporting designated sites, ecosystem services and the economic and social wellbeing of businesses, residents and visitors.

Bradford's biodiversity assets, as listed below, are shown on the Policies Map

<u>DESIGNATIONS IN BRADFORD DISTRICT</u>		<u>NOTES</u>
<u>INTERNATIONAL</u>	<u>Special Protection Areas (SPA)</u>	<u>South Pennine Moors SPA/SAC</u>
	<u>Special Areas of Conservation (SAC)</u>	
<u>NATIONAL</u>	<u>Sites of Special Scientific Interest (SSSI) – 4 no (1 no is same as SPA/SAC)</u>	<u>Bingley South Bog; Trench Meadows; Yeadon Brickworks (geological)</u>
	<u>Local Nature Reserves (LNR) 2no/3no</u>	<u>Railway Terrace; Sun Lane; (Ben Rhydding Gravel Pits)</u>
<u>REGIONAL</u>	<u>Local Wildlife Sites (LWS)</u>	<u>Former Sites of Ecological/Geological Importance (SEGI), Regionally Important Geological Sites (RIGS) and some Bradford Wildlife Areas (BWAs) sites have been combined into one</u>

³ <https://insideecology.com/2019/01/25/ensuring-biodiversity-net-gain-delivers-for-people/>
<https://osf.io/preprints/socarxiv/4yqh7>

	<u>Local Geological Sites (LGS)</u>	<u>system known as Local Wildlife Sites (LWS) and Local Geological Sites (LGS) Sites. Please see Appendix 4 for a full list.</u>
<u>Local</u>	<u>Local Wildlife Networks (LWN)</u>	<u>Includes designated habitats as well as some undesignated local habitats of high conservation value not qualifying as Local Wildlife Sites, which together form a network of connecting habitats or sites.</u>

The North and South Pennine Moors SPAs and SACs

A. Any development that would be likely to have a significant effect on a European Site (or land functionally linked to the SPA) either alone or in combination with other plans or projects will be subject to assessment under the Habitat Regulations at the project application stage. If it cannot be ascertained that there will be no adverse effects on site integrity then the project will have to be refused unless the derogation tests of Article 6(4) of the Habitats Directive can be met.

Sites of Special Scientific Interest

B. Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.

Local Wildlife Sites and Local Geological Sites

C. Development likely to have direct or indirect adverse effects on a Local Wildlife Site (LWS) or Local Geological Site (LGS) will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the substantive nature conservation value of the site. Proposals that are likely to have an impact on such sites will be assessed according to the following criteria:

1. Whether works are necessary for the management of the site in the interests of conservation.
2. Whether appropriate mitigation measures, which could include adequate buffer strips, have been incorporated into the proposals to

protect species and habitats, especially those for which the Local Wildlife Site has been designated.

3. The development would be expected to result in no overall loss of habitat, through avoidance, adequate mitigation or, as a last resort, the provision of compensatory habitats adjacent to or within the vicinity of any losses proposed. Existing habitats and proposed mitigation or compensatory measures should be quantified.

~~Habitats and Species outside Designated Sites~~

~~D. Proposals that may have an adverse impact on important habitats and species outside designated sites need to be assessed according to the following criteria:-~~

- ~~1. The potential for adverse impact on important/priority habitats that occur outside designated sites~~
- ~~2. The potential for adverse impact on species of international, national and local importance~~
- ~~3. The extent to which appropriate measures to mitigate any potentially harmful impacts can be identified and carried out~~
- ~~4. As a last resort, the extent to which appropriate measures to compensate any potentially harmful impacts can be identified and carried out.~~

~~The assessment needs to take account of:~~

~~West Yorkshire Local Site Selection Criteria and Where relevant developers will be expected to submit (European) Protected Species surveys and other ecological assessment related information with their application.~~

Wildlife Habitat Networks

D. The Wildlife Habitat Network will allow migration, dispersal and genetic exchange of plants and animals including pollinating insects in the wider environment, and includes links to adjoining districts. Through both plan making and development this network will be protected and opportunities will be taken to restore and enhance existing habitats, create new habitats and promote resilience to current and future pressures.

Development is to be carried out in a manner which consolidates the network and does not break its continuity. Development which would cause serious fragmentation of Wildlife Habitat Networks will be resisted.

Enhancement

~~E. Plans, policies and proposals should contribute positively towards the overall enhancement of the District's biodiversity resource.~~

~~They should seek to protect and enhance species of local, national and international importance and to reverse the decline in these species.~~

~~The Council will seek to promote the creation, expansion and improved management of important habitats within the district and more ecologically connected patchworks of grasslands, woodlands and wetlands. Opportunities for specific habitat creation within development proposals will be sought, including provision for future management.~~

~~The Council will seek to establish coherent ecological networks that are resilient to current and future pressures. Development which would cause serious fragmentation of habitats, wildlife corridors or have a significantly adverse impact on biodiversity networks or connectivity will be resisted.~~

~~Habitats of the moorland will be enhanced and landowners or occupiers will be actively encouraged to manage important areas for bird foraging to ensure continued provision of suitable habitat.~~

Habitats and Species of Principal Importance

E. The potential effects of a proposed development on protected species and habitats identified at the European, national or local level - including Habitats and Species of Principal Importance, will be a material consideration in the determination of planning applications.

Where significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

SPA qualifying bird populations will regularly use habitat outside the SPA boundary, where a development potentially impacts (directly or indirectly) land which has the potential to be functionally linked to the SPA, proposals will need to comply with point A above.

Moorland habitats will be enhanced and landowners or occupiers will be actively encouraged to manage important areas for bird foraging to ensure continued provision of suitable habitat.

~~Where supported by evidence the Council will recognise foraging/commuting areas for protected and SPA/SSSI qualifying features outside the statutory designated area as a material consideration in the preparation of development plans and in the determination of planning~~

~~applications. Where supported by evidence, foraging sites, currently outside the SPA/SAC and SSSI, will be considered for designation as a Locally Designated Site.~~

5.52 Reasonable Alternatives

5.52.1 The main reasonable alternative identified and rejected are detailed below:

- excluding the social outcome criteria from the biodiversity net gain section – it was considered that this may be emerging good practice and provides more balance to the policy;
- request a positive social net gain – may add undue burdens and costs to a scheme, and
- reducing the scale or coverage of the policy - risk that the policy would provide insufficient detail and not address issues in a comprehensive manner.

Consultation Question 36

Preferred Option: Policy EN2a: Biodiversity and Geodiversity

This policy seeks to protect and enhance biodiversity and geodiversity within the District, setting out the hierarchy of protected sites and identifying principles for enhancing the overall biodiversity resource.

This is a new policy which builds on the previous Policy EN2. The preferred option strengthens the hierarchical approach to the different nature conservation designations. It introduces a new level of designation – Local Wildlife Networks which allow for the migration, dispersal and genetic exchange of plants and animals. These networks will be protected from fragmentation. The policy also sets out how habitats and species of principal importance will be considered in the determination of planning applications.

Q36. Please provide your comments for Policy EN2a and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.52 Preferred Option: Policy EN2b: Biodiversity and Development

- 5.52.1 Policy EN2b (Biodiversity and Development) ensures that net gains in biodiversity are secured. In decision making and plan-making it identifies a range of factors that need to be considered regarding impacts on the District's biodiversity resource, its resilience and connectivity.
- 5.52.2 The Council will develop a biodiversity checklist as part of the planning application validation process which will provide guidance as to the appropriate level of ecological assessment to accompany an application.
- 5.52.3 Policy EN2b states that all major development and minor development which is deemed to have a negative impact on certain habitats and species is required to use the biodiversity offsetting approach. This means that the Defra / Natural England biodiversity metric will be used to calculate the Biodiversity Impact of a development, based on the condition and extent of the habitat affected. If the development results in a residual loss then an offset is required. To calculate if the project will have a positive or negative biodiversity impact an assessment will need to be carried out using the Defra /Natural England metric Tool.
- 5.52.4 All other development is still expected to provide a measurable net gain for biodiversity. A list of suggested biodiversity improvements and a list of suppliers will be included in the Appendix of the CSPR publication draft. [Best Practice Guidance for Biodiversity Net Gain](#) is published by CIRIA, IEMA and CIEEM in February 2019; this principles document is seen as the definitive guide and is supported by more detailed underpinning guidance.

Policy EN2b: Biodiversity and Development

A. All development should deliver a measurable net gain in biodiversity value. Development proposals that would result in a net loss of sites and species of ecological value will not be permitted.

B. All proposals for major development or development proposals that are likely to affect biodiversity will be required to provide an appropriate level of ecological survey or report, undertaken by suitably qualified ecologists and in accordance with CIEEM guidance and BS42020, with their application.

C. All proposals which require an ecological survey or report should also be accompanied by a biodiversity net gain calculation using the Defra / Natural England biodiversity metric and adhering to the Biodiversity Net Gain Good Practice Principles for Development.

D. Unless agreed otherwise, a biodiversity net gain of at least 10% should be demonstrated and on-going management secured.

E. Biodiversity net gains should be relevant to local biodiversity priorities and seek to protect and enhance species of local, national and international

importance and to reverse the decline in these species.

F. Where a proposal is below the thresholds for ecological assessment, a proportionate and measurable net gain for biodiversity should be incorporated into the design, relevant to the local area. A list of suggested biodiversity improvements can be found in Appendix 5.

G. Where a development proposal is likely to have an adverse impact on biodiversity, consideration should be given to the extent to which any such impacts could be reduced and minimised through protection, mitigation, enhancement and, as a last resort, compensatory measures. Where compensatory measures are required they will be subject to appropriate monitoring arrangements.

H. Biodiversity net gain proposals should be fully evaluated for their impacts on social wellbeing and should avoid impacts that are deemed unacceptable by the people affected and which cannot be adequately compensated.

5.53 Reasonable Alternatives

5.53.1 The main reasonable alternative identified and rejected are detailed below:

- excluding the social outcome criteria from the policy – it was considered that this may be emerging good practice and provides more balance to the policy.
- Request a positive social net gain – may add undue burdens and costs to a scheme.

Consultation Question 37

Preferred Option: Policy EN2b: Biodiversity and Development

The aim of this policy is to secure measurable net-gains in biodiversity value in all new development.

This is a new policy which establishes the requirement for major developments to provide an ecological survey and a biodiversity net gain calculation using the DEFRA/Natural England biodiversity metric. Developments should demonstrate a 10% biodiversity net-gain and show how the on-going management of such measures will be secured. The policy also requires net-gains for minor developments and provides a list of possible biodiversity improvements which can be made. It also considers the impacts on social wellbeing of any biodiversity net-gains that are proposed.

Q37. Please provide your comments for Policy EN2b and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

Policy EN3: Historic Environment – NOT UNDER REVIEW

Policy EN4: Landscape – NOT UNDER REVIEW

5.54 Preferred Option: Policy EN5: Trees and Woodland

- 5.54.1 Woodlands and trees are key elements of a sustainable environment. They enhance both urban and rural landscapes, provide valuable habitats for wildlife, create opportunities for leisure and recreation and combat pollution by providing oxygen and absorbing dust and carbon dioxide.
- 5.54.2 Protecting and enhancing the District's woodlands in the context of the climate emergency, potential threats from disease and the need to accommodate population growth will be a significant challenge. The provision of trees and woodland is important for the District due to the wide range of benefits for both the District's residents and wildlife.
- 5.54.3 Due to the climate emergency, there is an increasing emphasis on the importance of protecting existing trees and planting new ones. The Government's 25 Year Environment Plan seeks to increase national woodland cover to 12% by 2060. It has also established the Northern Forest, a long-term plan to plant 50 million trees in and around the cities of Northern England. The aims of the project are being delivered regionally by The White Rose Forest which seeks to increase tree cover by a third in the Leeds City Region by working with landowners, community groups and businesses. In this review, Policy EN5 has been strengthened regarding the retention and incorporation of trees in new development to support these initiatives.
- 5.54.4 The revised NPPF (2019) introduced a new test for the protections of ancient woodland and ancient or veteran trees, stating that development resulting in the loss or deterioration of irreplaceable habitats (including such trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Policy EN5 has been updated to reflect these changes in national policy and offer increased protection for the District's 550 Ha of ancient woodlands and ancient or veteran trees which have a unique biodiversity value which cannot be replaced once destroyed.
- 5.54.5 The Government also produces Standing Advice (most recently updated in January 2018) on protecting ancient woodland, ancient trees and veteran trees, which is a material consideration and should be adhered to at all times. This includes advice regarding the mitigation hierarchy, the use of buffer zones, compensation, the planting of new native woodland and the restoration of existing ancient woodland.

Policy EN5: Trees and Woodland

A. The Council will seek to ~~preserve~~ protect and enhance the contribution that trees and areas of woodland cover make to the character of the District. Well targeted, native tree planting and woodland creation will be encouraged, with a view to enhancing biodiversity.

~~A. In making decisions on planning applications and in local plans, trees and~~

~~areas of woodland that contribute towards:~~

~~1. The character of a settlement or its setting or the amenity of the built-up area~~

~~2. valued landscapes or~~

~~3. wildlife habitats~~

~~Will be protected.~~

B. Development proposals which would have adverse impacts or destroy ancient semi-natural woodland, including replanted ancient woodland and/or ancient or veteran trees will not be permitted.

There will be a presumption in favour of the retention and enhancement of existing tree, woodland and hedgerow cover; particularly those which contribute towards:

1. The character of a settlement or its setting or the amenity of the built-up area;

2. valued landscapes;

3. wildlife habitats.

C. The planting of additional trees and woodland will be encouraged and proposals for development should result in no net loss of trees or woodland. All new development should integrate existing healthy trees. During construction, any trees to be retained in the development must be protected. In the case of ancient woodland, individual ancient or veteran trees, the Government Standing Advice should be adhered to including the use of appropriate buffer zones. Where appropriate, trees lost or damaged during construction will be replaced and maintained in their place, providing at least one new tree for every tree lost. If young trees replace mature trees, they should be planted at a ratio of two trees for every tree lost.

D. Tree survey information should be submitted with all planning applications, where trees are present on site. The tree survey information should be in accordance with guidance in British Standard BS 5837 and include protection, mitigation and management measures.

~~D.E.~~ The Council will continue to make Tree Preservation Orders where necessary, especially within and adjacent to development and will rigorously enforce such orders. ~~On development sites, the Council will require the retention of those trees which are healthy and which have or would have a clear public amenity benefit. The Council will require the protection during construction of trees to be retained and, where appropriate, replacement tree planting for trees lost or damaged during construction.~~

5.55 Reasonable Alternatives

5.55.1 No reasonable alternatives identified.

Consultation Question 38

Preferred Option: Policy EN5: Trees and Woodland

This policy looks at the protection and enhancement of trees and woodland together with the protection and provision of trees in new development. In particular it ensures the protection of ancient semi-natural woodland and veteran trees.

The preferred option sees the policy updated to ensure that during the construction of new development appropriate buffer zones around existing trees are put in place to reduce the risk of damage. It also requires any trees lost to be replaced on a one for one basis and at a ratio of two for one where mature trees are lost. It also encourages the planting of new native tree species with a view to enhance biodiversity.

Q38. Please provide your comments for Policy EN5 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.56 Preferred Option: Policy EN6: Energy

5.56.1 The purpose of the policy is to encourage the provision of renewable and low carbon energy through the planning system, but also to recognise the role of planning in setting the framework to allow assessment of potential impacts and to influence decision-making based on assessment.

- 5.56.2 In January 2019 Bradford Council declared a 'climate emergency' acknowledging the need to transition to a low-carbon society by 2030. In order to meet both the Government and Bradford Council's carbon-cutting ambitions, higher levels of energy efficiency and greater use of low carbon and renewable energy are required. Measures should focus not simply on achieving renewable means of producing electricity but also on renewable forms of heating and the implications for transport. The Energy Policy therefore has strong links to Strategic Core Policy 2 relating to Climate Change and Resource Use.
- 5.56.3 The West Yorkshire Combined Authority and Leeds City Region Enterprise Partnership (LEP) approved the Leeds City Region Energy Strategy which sets out steps to make the City Region a zero-carbon energy economy. The Energy Strategy sets out initiatives including investment in local low-carbon energy schemes, measures to improve the energy efficiency of homes, the introduction of low-emission buses and the installation of ultra-low emission vehicle charging points across West Yorkshire.
- 5.56.4 The NPPF (paragraph 151) indicates that in planning for an increase in the use and supply of renewable and low carbon energy any adverse impacts need to be satisfactorily addressed. In particular consideration should be given to the impacts on the natural and historic environments, biodiversity and any cumulative landscape and visual impacts. Policy EN6 therefore requires that applicants fully appraise the environmental impacts and identify any mitigation measures to be incorporated into the proposal. The requirements identified in Policy EN4 Landscape, in relation to potential impacts on landscape character and the need for the application of visualisation techniques therefore need to be applied.
- 5.56.5 The revised NPPF includes a footnote (49) which incorporates the 2015 Written Ministerial Statement which indicates that wind energy development should not be considered acceptable unless it concerns the repowering of existing wind turbines or is in an area identified for wind energy and following consultation the planning impacts have been fully addressed and the proposal has the local community's backing. The Council does not currently have any land allocated as suitable for wind energy.
- 5.56.6 In addition, the Core Strategy Habitats Regulations Assessment identified the potential for adverse impacts on important bird species via the impact pathway of collision mortality risk and/ or displacement from wind turbine developments. Any assessment of potential impacts, in relation to HRA stipulations, would also need to take account of Strategic Core Policy 8 relating to the South Pennine Moors Zone of Influence and EN2 relating to biodiversity.

Policy EN6: Energy

A. Planning decisions as well as Plans, strategies, investment decisions and programmes developed by the Council and its partners will maximise improvements to energy efficiency and support the development of decentralised, renewable and low carbon sources of energy (electricity and heat) by:

1. Identifying suitable areas and opportunities for low carbon and renewable energy developments.

2. Ensuring that future development takes place in locations and at a scale that can make a positive contribution to the district's capacity for renewable and low carbon energy.

~~3. B. Setting out local requirements for the use of decentralised energy and sustainability of buildings in the~~ The Allocations DPD, Bradford City Centre ~~Area Action Plan~~ AAP and the Shipley and Canal Road Corridor ~~DPD~~ AAP will set out local requirements for the use of decentralised energy and the sustainability of buildings. These requirements will ~~that~~ promote the maximum use of decentralised energy in areas of greatest opportunity, while taking into account viability and feasibility.

~~B. C.~~ All proposals for renewable and low carbon energy generation must include a full assessment of the environmental, economic and social impacts and, where the assessment shows that potential adverse impacts can be managed, the integration of measures to minimise such impacts. The assessment of environmental impacts will need to ~~include~~ consider any cumulative landscape and visual impacts and ~~to ensure~~ demonstrate that development will have no adverse impact on the integrity of the South Pennine Moors SAC/SPA.

5.57 Reasonable Alternatives

5.57.1 The key reasonable alternatives include:

- Retaining the existing policy as drafted – the revised text slightly strengthens the policy themes with the changes remaining fairly minor.

Consultation Question 39

Preferred Option:

Policy EN6: Energy

This policy looks to maximise improvements to energy efficiency and support the provision of decentralised and renewable energy in the District.

The preferred option has seen some minor changes made to the policy wording to clarify the position with regards to the setting of local requirements for the sustainability of buildings.

Q39. Please provide your comments for Policy EN6 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.58 Preferred Option: Policy EN7: Flood Risk

- 5.58.1 The overall objectives of Policy EN7 are to appraise, manage and reduce the risk of flooding. The policy identifies the principles to guide the process of identifying locations for future development while seeking to reduce flood risk, assess proposals that come forward and adopt a positive approach to water management. Flood risk is defined in the PPG as: *'a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources'*.
- 5.58.2 The NPPF requires Local Plans to take account of climate change over the longer term and plan new development to avoid increased vulnerability to the range of impacts arising from climate change. The sequential testing approach is supported and Technical Guidance has been produced setting out how this policy should be implemented. Key principles identified are; safeguarding land from development that is required, or likely to be required, for current and future flood management; using opportunities offered by new development to reduce the causes and impacts of flooding; and developing policies to manage flood risk from all sources. When applying sequential testing principles to the choice of sites for future development, where data exists, all sources of flood risk will be taken into account, including those associated with ground water flooding.
- 5.58.3 The Flood and Water Management Act 2010 has given Lead Local Flood Authorities responsibility for identifying sources of local flood risk and reducing the likelihood and impacts of local flooding. These sources include surface run off, groundwater and flooding from smaller rivers and streams. The Act ends the automatic right to connect surface water drains and sewers to the public sewerage system, with developers being required to use Sustainable Drainage Systems (SuDS) in new development, where practicable. Issues relating to the adoption and future maintenance of SuDS will need to be resolved by local authorities and developers.
- 5.58.4 The most important principle, in terms of managing risk is that development should only be permitted in areas of high flood risk when no alternative land in areas of lower flood risk is available and the overall benefits of the development outweigh the risks from flooding. Risk should be reduced, at a strategic level, by safeguarding

land from development that is required for flood water storage and defences and using the opportunities offered by new development to incorporate sustainable drainage systems (SuDS), green infrastructure for water storage and the re-creation of the functional flood plain.

- 5.58.5 Bradford District includes the catchment areas of the River Aire and the River Wharfe, the latter forming a main river within the River Ouse catchment. Both the Aire and the Ouse play an important role in the future planning of neighbouring authorities within the Leeds City Region and beyond. The strategic level of appraisal that has been carried out to date, identifies flood risk as an important issue that needs to be addressed, particularly in the Regional City of Bradford and in Keighley and Ilkley.
- 5.58.6 The River Aire within Bradford District is characterised by a number of swift flowing upland streams which then flow down through the towns along the valley. The upper reaches of the River Aire within Bradford District have a largely rural character and the flood plain in the Silsden and Steeton with Eastburn area is quite extensive. The River Worth is one of the larger contributing catchments and joins the River Aire at Keighley.
- 5.58.7 The middle reaches of the River Aire are heavily urbanised and contain the towns of Keighley, Bingley, Shipley and the City of Bradford. Between Keighley and Leeds the valley floor steepens and becomes narrower. The density of development within the valley has resulted in significant restrictions to the natural floodplain.
- 5.58.8 Periods of heavy rainfall in the uplands can therefore produce high flows in the tributary catchments between Keighley and Bradford. This problem becomes most acute in densely developed areas where gradients are steep, for example within the heavily modified Bradford Beck corridor.
- 5.58.9 The functional floodplain identified for the Beck has been based on the Bradford Beck Model. Information from the modelling work and subsequent SFRA has been used to inform the approach taking to managing flood risk in the City Centre AAP and Shipley & Canal Road Corridor AAP, particularly in terms of the provision of blue and green infrastructure and restoring the natural character of the Bradford Beck where possible.
- 5.58.10 The River Wharfe skirts the settlements of Addingham, Burley-in-Wharfedale and passes through the central area of Ilkley. It is a fast reacting river with flood flow rapidly passing downstream. As well as flows that come down from the upper Wharfe, there are a number of smaller streams and becks descending from the moors in Wharfedale, which can be a source of flood risk in extreme rainfall events. The importance of flood storage provision within the Aire and Wharfe corridors and of flood risk from the Becks and links with green infrastructure are key challenges.
- 5.58.11 Surface water flooding can occur where extensive rainfall exceeds the drainage capacity in an area. The shape of the landform in Bradford, especially in and around a number of the built-up areas, makes the district potentially prone to flooding

caused by direct rainfall, due to the extent of hard surfaces and a lack of sufficient sewer capacity. In addition to causing flooding to property, surface water runoff can lead to water quality issues and potential health risks.

- 5.58.12 All forms of flooding and their impact on the natural and built environment are planning considerations. The Council's commitment to achieving the overall objectives of policy including those of appraising, reducing and managing all sources of flooding. Policy EN7 should also be read alongside Strategic Core Policy 2 (Climate Change); Policy SC6 (Green Infrastructure) and Policy EN8 (Environmental protection) as a set of inter-related policies.
- 5.58.13 A Level 1 Strategic Flood Risk Assessment (SFRA) has been prepared for the Bradford District and provides data and guidance to inform the flood risk policies in the Core Strategy. The SFRA identifies the functional flood plain (Flood Zone 3b), comprising largely of open and undeveloped land where water has to flow or be stored in times of flooding. It also identifies areas naturally vulnerable to surface water flooding and considers the potential impact of climate change which will help to identify locations for future development.
- 5.58.14 The SFRA provides a framework for the overall appraisal and management of risk. It allows the identification of land with the lowest probability of flooding that would be appropriate to the type of development or land use proposed. Information from the SFRA and Sustainability Appraisal will be used to demonstrate the principle of sequential testing at a strategic level.
- 5.58.15 Policy EN7 supports the extent of the functional flood plain identified in the SFRA, allowing only water compatible uses and essential infrastructure after the Exception Test has been passed. The SFRA indicates that the functional flood plain forms a very important planning tool in making space for flood waters when flooding occurs and that development should be directed away from these areas.
- 5.58.16 While major parts of urban Bradford lie outside the flood plain, the SFRA notes that some built up areas are at risk of flooding from a number of different sources. Flooding has been recorded when the River Aire overtops into the Leeds-Liverpool Canal, causing increased flood risk to communities located close to the canal network. Shipley is identified as an area at risk from a number of different sources of flooding, as is Keighley which has experienced groundwater and surface water flooding as well as fluvial flooding.

Policy EN7: Flood Risk

A. The Council will manage flood risk pro-actively through plan making and in assessing proposals for development. In particular it will:

- 1. ~~Integrate sequential testing into all levels of plan-making~~ Direct development to areas with the lowest risk of flooding. Where applicable, apply the sequential test and, if necessary, the exception test; taking into account the potential impacts of climate change.**

~~2. Require space for the storage of flood water within Zones 2 and 3a~~
Ensure that development proposals: address all sources of flooding; do not increase flood risk elsewhere; and take account of the need for improved drainage infrastructure.

3. Require applications to be supported by a site-specific flood risk assessment in line with the requirements of the NPPF. The assessment should address the risks from all sources of flooding; including fluvial, surface and ground water flooding and should make allowances for the potential impacts of climate change.

~~4. 3.~~ Ensure that any new development in areas of flood risk is appropriately resilient and resistant and made safe for its lifetime without increasing the flood risk elsewhere.

5. Require space for the storage of flood water within Flood Zones 2 and 3a.

6. Safeguard areas which have the potential to increase flood storage provision and improve defences within the Rivers Aire and Wharfe corridors.

~~7. 5.~~ Manage and reduce the impacts of flooding within the beck corridors, in a manner that enhances their value for wildlife and helps to increase biodiversity.

~~Require that all sources of flooding are addressed, that development proposal will only be acceptable where they do not increase flood risk elsewhere and that any need for improvements in drainage infrastructure is taken into account.~~

~~8. 6~~ Adopt a holistic approach to flood risk in the Bradford Beck corridor in order to deliver the sustainable regeneration projects set out in the City Centre and Shipley & Canal Road corridor AAPs, LDDs and in master planning work.

~~9. 8~~ Seek to minimise surface water run-off from new development: ~~:- for Greenfield sites run off should be no greater than the existing Greenfield overall rates~~

a) on Brownfield sites drainage proposals will be measured against the existing performance of the site but will be encouraged to reduce run-off rates by at least 30%.

b) on Greenfield sites there should be no change to the existing overall run-off rate and where possible improvements should be made to reduce it.

- 10. Require surface water to be drained on a separate system, with proposals following the drainage hierarchy in order of priority:**
- a) drain into the ground (infiltration)
 - b) drain to a surface water body
 - c) drain to a surface water sewer, highway drain or another drainage system
 - d) drain to a combined sewer.
- 11. 9. Require major developments, and where appropriate all other developments, to incorporate SuDS ~~Require developers to assess the feasibility of implementing and maintaining~~ **SUDS** in a manner that is integral to site design, achieves high water quality standards and maximises habitat value, unless it can be demonstrated that this is not technically feasible. Arrangements should be made to ensure the management and maintenance of the SuDS scheme for the lifetime of the development.**
- 12. Use flood risk data to inform decisions made about Green Infrastructure.**
- 13. Identify opportunities and support proposals for natural flood management, including the restoration of culverted watercourses to open channels and tree planting schemes.**
- 14. Only support the use of culverting for ordinary water courses, and additional flood defence works that could have adverse impacts on the environment, in exceptional circumstances.**
- B. The Council will not permit development in areas which are shown as within the functional floodplain (Flood Zone 3b) as defined in the *most up-to-date Bradford* SFRA with the exception of water compatible uses and essential infrastructure.**

5.59 Reasonable Alternatives

- 5.59.1 No reasonable alternatives identified - the policy is strengthened relating to Surface Water run-off, SuDS and Natural Flood Management. Updating to reflect new SFRA and other flood risk management strategies.

Consultation Question 40

Preferred Option: Policy EN7: Flood Risk

This policy looks at how the Council will pro-actively manage flood risk across the district as part of new development and plan making.

The preferred option has seen the policy strengthened to clarify the application of the sequential and exception tests, require planning applications to be supported by a site-specific flood risk assessment where applicable, introduces the drainage hierarchy and requires major developments to incorporate SuDS. It also clarifies the surface water run-off rates for both Brownfield and Greenfield development and supports proposals for natural flood risk management.

Q40. Please provide your comments for Policy EN7 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

5.60 Preferred Option: Policy EN8: Environmental Protection

5.60.1 It is important that the quality of land, air and water in the District is protected and not adversely affected by new development. Policy EN8 covers a number of areas relating to pollution control including air quality, land, nuisance, and water quality. The development of Brownfield land is likely to raise some of these environmental protection issues due to former land uses. However, development of greenfield or Green Belt land may also raise issues such as land stability linked to former mining activity, the presence of pollutants associated with current agricultural practices or health and safety concerns associated with electricity pylons and power lines.

Contaminated Land

5.60.2 The legacy of past manufacturing, engineering and industrial processes, has resulted in the potential for residual contamination of sites across the District. The focus on encouraging the recycling of brownfield land and the need to identify suitable sites for accommodating future growth means that land contamination is an important planning consideration. Sites must be subject to appropriate investigation and assessment of potential risks associated with previous land uses in order to determine their suitability for alternative uses. Any such contamination issues will need to be resolved before development can progress.

Hazardous Installations

5.60.3 There are a number of sites within the District where significant quantities of potentially hazardous chemicals are used and stored. This can place significant restrictions on the amount and types of development that can be located in the surrounding area and should be taken into account when identifying sites in the Allocations DPD.

Nuisance

- 5.60.4 Nuisance issues can include noise, dust, odour and lighting which can have a significant impact on the quality of life. When identifying land for development and in responding to development proposals, consideration of existing land uses within the vicinity of the site need to be taken into account.

Air Quality

- 5.60.5 Monitoring evidence shows that air quality in Bradford is worse than in many parts of the UK and these issues are mainly attributable to emissions from transport. Addressing air quality issues is recognised to be complementary to the aim of achieving a reduction in emissions from transport. This is reflected in the transport section (particularly Policy TR1) and the overall strategic approach to addressing climate change (Policy SC2) and creating healthy places (Policy SC10).
- 5.60.6 Bradford has declared four Air Quality Management Areas (AQMAs) where the annual mean levels of nitrogen dioxide have exceeded the maximum legal limits. Poor air quality is linked to respiratory illnesses, heart disease and asthma and is a major public health concern.
- 5.60.7 The Council has prepared both an Air Quality Strategy (2011) and Low Emission Strategy (2013) setting out its commitment to taking a pro-active stance in addressing air quality issues. The impact of transport is a cross-boundary issue and the five West Yorkshire Local Authorities have prepared the West Yorkshire Low Emissions Strategy (2016-2021) which outlines the key challenges in relation to air quality within West Yorkshire.
- 5.60.8 At a national level the government has prepared a UK Air Quality Plan and a Clean Air Zone Framework as part of its response to addressing air quality breaches across the country and to comply with EU legislation on Limit Values. Bradford Council has received Ministerial Direction from the Government to produce a business case for an Air Quality Plan to achieve air quality compliance in the shortest time possible. This plan will consider the implementation of a Clean Air Zone in order to achieve sufficient improvements in air quality and public health.
- 5.60.9 The need to accommodate growth particularly in the Bradford 'basin' and transport corridors leading out of the city is likely to exacerbate air quality issues in the future if actions are not instigated to address them. This could lead to serious impacts on the health of residents, who already see relatively high incidents of death from heart disease and a high number of cases of asthma.
- 5.60.10 As well as addressing air quality in the AQMAs there is a need to look at the broader impacts of emissions and air pollution on the wider environment. The policy seeks to ensure that development proposals which are likely to have an adverse impact on air quality suitably address these issues.

- 5.60.11 As part of the preparation of the Allocations DPD a modelling exercise will be carried out to assess the possible effects of sites on areas of air quality concern, including the European Designated sites for nature conservation. The modelling will look at the effects on air quality from increased traffic as a result of the potential development of the sites selected for allocation. It will consider the impact of those effects on the European sites and the surrounding communities. This information will be used to put in place relevant mitigation measures to ensure that there are no adverse effects on the European sites.
- 5.60.12 Other policies in the Core Strategy set out measures which developments should follow in order to mitigate vehicle emissions, exposure to emissions, and provide residents with the opportunity to make green travel choices.

Water Quality

- 5.60.13 The Water Framework Directive (WFD) establishes the legal framework for the protection of surface and ground waters. It provides a set of common objectives, principles and basic measures for the management of the water environment. The main aims of the directive are to prevent the deterioration of aquatic systems and help to restore polluted surface water and ground water to a 'good status'. It also sets objectives relating to ecology, with the return of migratory fish to the rivers Aire and Wharfe by 2021 being a key objective applicable to the Bradford District.
- 5.60.14 The Environment Agency has prepared a number of River Basin Management Plans to support the implementation of the WFD. Bradford District is covered by the management plan for the Humber and addresses the integrated management of the water environment, supporting initiatives to prevent and mitigate the effects of floods and droughts.
- 5.60.15 The policy addresses the need to protect water resources and water quality and ensures the efficient use of water. It recognises the potential impact that new development and growth could have on water resources and quality in the District.
- 5.60.16 The policy has been updated to reflect stakeholder feedback, providing additional details regarding the requirements of the WFD. In particular it supports development which helps to improve the ecological status of water bodies and manages water demand.

Policy EN8: Environmental Protection

In order to protect public health and the environment the Council will require that:

Proposals which are likely to cause pollution or are likely to result in exposure to sources of pollution (including noise, odour and light pollution) or risks to safety, will only be permitted if measures can be implemented to minimise pollution and risk to a level that provides a high

standard of protection for health, environmental quality and amenity. The following issues require particular attention:

A. Air Quality

In liaison with partner organisations, the Council will take a proactive approach to maintaining and improving air quality within the District in line with ~~both~~ the National Air Quality Standards, the European Union limit values and the principles of best practice. Through a range of actions, it will seek to secure a reduction in emissions from sources which contribute to poor air quality.

Development proposals that have the potential to have an adversely-impact on air quality will be required to incorporate measures to mitigate or offset their emissions and impacts, in accordance with the Low Emission Strategy for Bradford and associated guidance documents.

In areas where air quality is a matter of concern, development proposals will be required to deliver a positive impact on air quality in the district.

Development proposals must not exacerbate air quality beyond acceptable levels; either through poor design or as a consequence of site selection.

B. Land

Proposals for development of land which may be contaminated or unstable must incorporate appropriate investigation into the quality of the land. Where there is evidence of contamination or instability, remedial measures must be identified to ensure that the development will not pose a risk to human health, public safety and the environment. Investigation of land quality must be carried out in accordance with the principles of best practice.

C. Nuisance

Proposals for development must identify potential nuisance issues (including noise, vibration, odour, light and dust) arising from the nature of the proposal and address impacts on that development from existing land uses.

D. Water Environment

The Council will work with partner organisations to: safeguard ground and surface water resources; ensure no deterioration of water courses or water bodies occurs; and ~~to~~ protect and improve water quality.

Proposals for development will only be acceptable **provided where** there is no adverse impact on water bodies and groundwater resources, in terms of their quantity, quality and the important ecological features they support. ~~In the longer term, the aim will be to improve the ecological status of water within Bradford.~~

Proposals for development will be supported where they:

- make positive progress towards achieving 'good' ecological status or ecological potential under the Water Framework Directive for surface and groundwater bodies.
- enhance the natural geomorphology of watercourses, including through the opening up of culverts and removal of modifications made as part of past industrial uses.
- manage water demand and improve water efficiency through the use of appropriate measures including rainwater harvesting and grey-water recycling.

5.61 Reasonable Alternatives

- 5.61.1 No reasonable alternatives identified - the policy is strengthened in relation to feedback from statutory consultee.

Consultation Question 41

Preferred Option:

Policy EN8: Environmental Protection

The overall aim of the policy is to protect public health and the environment by ensuring that all forms of pollution are minimised and adequately mitigated as part of new developments.

This policy has been amended to include additional details relating to the implementation of the Water Framework Directive. In particular it looks to support development which helps to achieve 'good' ecological status of surface and ground water bodies. It also looks to support the opening up of culverts to enhance the natural geomorphology of water courses as well as managing water demand and improving water efficiency in new developments.

Q41. Please provide your comments for Policy EN8 and any suggested changes to the policy?

If you would support an alternative to the preferred option, please provide further details and evidence to support this.

SECTION 5

Thematic Policies: Minerals, Waste Management and Design



Sections 5: Minerals, Waste Management and Design

5.62 Overview

- 5.62.1 There are no major changes proposed to Core Strategy minerals policies. As such they are not included within the scope of the Partial Review. Some minor editing of the reasoned justification, relating to mineral supply and landbanks is being updated to reflect more recent evidence set out in the West Yorkshire Local Aggregate Assessment (2018). The current policies remain consistent with national policy. The amendments to the reasoned justification will be published in the Submission Draft version of the document.

SECTION 6

Implementation & Delivery



Section 6: Implementation and Delivery

6.1 About

- 6.1.1 This section sets out several policies which support the implementation and delivery of the Core Strategy policies and support development and change.
- 6.1.2 A number of minor changes have been to several policies in this section in order to reflect changes in terminology and to reflect the most up to date situation regarding adopted and emerging Development Plan Documents and Area Action Plans as well as ongoing work to develop the Local Infrastructure Plan (LIP).
- 6.1.3 The most significant change to this section relates to policy ID2: Viability. This is driven by changes in national planning policy on viability through revisions to the National Planning Policy Framework and associated Planning Practice Guidance.
- 6.1.4 These changes relate to the role of viability in the plan making process and the need to ensure greater transparency in relation to viability assessments submitted as part of planning applications. A Whole Plan Viability Assessment will form part of the evidence of the Core Strategy Partial Review.

6.2 What you told us

- 6.2.1 The key messages from the scoping consultation included:
- **General support** for updating the viability evidence with a recommendation to work closely with the development industry.
 - **Up-fronting viability assessment** - some agreement with Government over requiring viability to be considered at the plan-making rather than application stage. Also some concerns from some parties over how accurate viability assessment can be undertaken at the plan-making stage.
 - **Viability policies** – need to avoid overly onerous policy requirements and affordable housing obligations should still be negotiated through viability assessments for site abnormalities and market changes.
 - **Avoiding planning contributions** – concerns that developers have historically avoided contributing towards affordable housing and other requirements and that some of this may still occur in the future.
 - **Affordable housing** – support for continuing with different affordable housing targets for different parts of the District.

6.3 Findings and Policy Directions

- 6.3.1 Ensuring the viability and deliverability of planning policies and development are important considerations in plan making and decision taking.
- 6.3.2 National planning policy and guidance require infrastructure and viability issues to be assessed in detail as part of the process of preparing Local Plans. This means that the onus will be on the applicant to demonstrate if site specific circumstances justify the need for a viability assessment at the planning application stage.
- 6.3.3 To ensure the Core Strategy is viable and deliverable it has been informed by a Whole Local Plan Viability Assessment. This includes the cumulative impact of all relevant policies set out in the Core Strategy as well as infrastructure requirements and planning obligations on development viability.
- 6.3.4 The Local Whole Plan Viability Assessment will assess the viability of development across the district and help ensure the policies in the Core Strategy are implemented in a way which supports the delivery of sustainable development.
- 6.3.5 The policy requirements and standards in the Core Strategy will be set at a level to ensure that the planned scale of development is not subject to such a scale of obligations that its ability to be developed viably is threatened. However, at a plan wide level the Local Plan Viability Assessment only provides evidence that the policies and standards are broadly viable, as the results are based on modelling assumptions and hypothetical schemes.
- 6.3.6 There may be instances where site specific circumstances mean that a scheme will not be able to be developed viably with the policy requirements in the Local Plan. Therefore, certain policy requirements in the Core Strategy are subject to viability to ensure delivery of planning objectives at all stages of the economic cycle and that individual site circumstances are taken into account.
- 6.3.7 Viability Assessment is a process of assessing whether a site is financially viable, by looking at whether the value generated by a development is more than the cost of developing it. Where an applicant wishes to demonstrate that a site is financially unviable based on the level of planning obligations, policy and infrastructure requirements required by the Council, or site specific issues, they must provide a suitably detailed Viability Assessment to support this claim. It should be based upon, and refer to, the Whole Plan Viability Assessment that has informed the Local Plan. It should also reflect the approach to defining key inputs set out in national Planning Practice Guidance on Viability
- 6.3.8 In accordance with the NPPF (2019) and PPG, the approach to viability is to be “open book” with the onus placed on the applicant to demonstrate whether circumstances have changed since the Whole Plan Viability Assessment was undertaken.

6.4 Preferred Option: Policy ID2: Viability

- 6.4.1 Policy ID2 will help to ensure the Local Plan is viable and deliverable by establishing the principles for considering financial viability through the plan making and development management processes. The Policy supports objectives 1, 2 and 5 of the Core Strategy.
- 6.4.2 Key policy linkages include policies HO9, HO11 and ID3.

Policy ID2: Viability

~~A. Where a variation to planning policy requirements or planning obligations is sought due to financial viability, a viability assessment must be submitted to the Council.~~

~~B. Where a development is economically unviable consideration will be given to individual scheme financial viability in the determination of planning applications.~~

Viability will be considered as part of the plan-making process. The Council will only consider the viability of development proposals at the planning application stage where:

A. Required planning obligations are in addition to those considered as part of the Whole Plan Viability Assessment; or

B. Where it can be demonstrated there are exceptional site specific viability issues not considered as part of the Whole Plan Viability Assessment

Where this occurs, applicants should submit a viability assessment. This should be based on the requirements outline in the Planning Practice Guidance on Viability, with an “open book” approach being adopted in order to allow for a full review of evidence and maintain transparency.

6.5 Alternative Options

- 6.5.1 There are no alternative options. The proposed change ensures that the policy is consistent with national planning policy.

Consultation Question - Policy ID2: Viability

Preferred Option: Policy ID2: Viability

Policy ID2 will help to ensure the Local Plan is viable and deliverable by establishing the principles for considering financial viability through the plan making and development management processes. The Policy supports objectives 1, 2 and 5 of the Core Strategy

The Preferred Option reflects recently updated national planning policy and guidance that places greater emphasis on establishing financial viability as part of the plan making process, and sets out the circumstances under which viability of development proposals will be considered at the planning application

Q41 Do you agree with the preferred approach to viability?

If you would support an alternative to the Preferred Option, please provide further details and evidence to support this.

Appendices



Appendix 1: From Scoping Stage to Preferred Options

Core Strategy Policy	CSPR Scoping Stage – January to February 2019: Status at time of consultation	CSPR Preferred Options July to September 2019: Status at time of consultation
Plan period	Under review	Preferred option of 2020-37
Presumption in Favour of Sustainable Development		
P1 Presumption in Favour of Sustainable Development	Not under review	Not under review
Strategic Core Policies		
SC1 Overall Approach and Key Spatial Priorities	Maybe some consequential amendments	Policy updated – The Preferred Option makes reference to the updated plan period, a consistent approach to growth and regeneration and includes enhanced reference to climate change and healthy communities.
SC2 Climate Change and Resource Use	Not under review	Policy updated - The preferred option for the updated policy includes new references to Green Infrastructure (identifying its importance in helping to adapt to climate change) and air quality (seeking to improve air quality through reduced emissions by improving public transport and active travel options). This will further help to ensure that Bradford continues to transition towards a low-carbon economy and society whilst enhancing the resilience to the potential impact of climate change.
SC3 Working together to make Great Places	Not under review	Not under review
SC4 Hierarchy of Settlements	Not under review	Not under review
SC5 Location of Development	Maybe subject to review depending upon scale of growth, Green Belt and other considerations	Policy updated - he preferred policy now primarily includes changes to Green Belt site prioritisation and a reordered movement hierarchy.
SC6 Green Infrastructure	Possible light refresh as work progresses on site allocations.	Policy updated – The preferred option updates this policy to include a requirement for new development to identify opportunities to link together areas of Green Infrastructure, particularly where gaps exist in the network. It also strengthens the policy approach to

		protecting Green Infrastructure network.
SC7 Green Belt	Under review	Policy updated - The policy has been updated to provide clearer strategic policy direction on Green Belt release priorities and links through to supporting thematic and sub area policies. A new section has also been added on safeguarded land.
SC8 Protecting the South Pennine Moors and their Zone of Influence	Not under review	Policy updated - The purpose of this policy is to avoid any potential adverse impacts on the South Pennine Moors SPA and SAC, yet allow development to take place in locations and on a scale where potential impacts are at such a level that there is confidence that avoidance and mitigation measure can be effective.
SC9 Making Great Places	Not under review	Not under review
SC10 Creating Healthy Places	Identified as possible new policy area.	New Policy Drafted - The policy provides a strategic context to creating healthy places, introduces health impact assessments for major developments and policy on the location of new health facilities / infrastructure.
Sub Area Policies		
BD1 The Regional City of Bradford including Shipley and Lower Baildon	Under review	Policy updated - Update to the policy to include updated distribution of growth figures and alignment with other updated policies.
Sub Area Policy BD2: Investment Priorities for the Regional City of Bradford including Shipley and Lower Baildon	Maybe some consequential amendments	Policy updated - Policy has been updated to generally reflect changes to Policy BD1 and updates to strategic and thematic policies.
Sub Area Policy AD1: Airedale	Under review	Policy updated - Update to the policy to include updated distribution of growth figures and alignment with other updated policies.
Sub Area Policy AD2: Investment Priorities for Airedale	Maybe some consequential amendments	Policy updated - Policy has been updated to generally reflect changes to Policy AD1 and updates to strategic and thematic policies.
Sub Area Policy WD1: Wharfedale	Under review	Policy updated - Update to the policy to include updated distribution of growth figures and alignment with other updated policies.
Sub Area Policy WD2: Investment Priorities for	Maybe some consequential amendments	Policy updated - Policy has been updated to generally reflect changes

Wharfedale		to Policy WD1 and updates to strategic and thematic policies.
Sub Area Policy PN1: South Pennine Towns and Villages	Under review	Policy updated - Update to the policy to include updated distribution of growth figures and alignment with other updated policies.
Sub Area Policy PN2: Investment Priorities for the Pennine Towns and Villages	Maybe some consequential amendments	Policy updated - Policy has been updated to generally reflect changes to Policy PN1 and updates to strategic and thematic policies.
Thematic Policies: Economy		
EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region	Under review	Policy updated - Policy EC1 has been subject to a major rewrite to align with the new economic growth strategy for the District.
EC2: Supporting Business and Job Creation	Under review	Policy updated - Significant redrafting and refocusing of the policy to consider new employment land requirements, priority sectors and focus upon engraining local skills and training development opportunities.
EC3: Employment Land Requirement	Under review	Policy updated - Policy has been subject to significant redrafting to more clearly focus upon policy delivery, identifies key areas of employment space and skills.
EC4: Sustainable Economic Growth	Not under review	Not under review
EC5: City, Town, District and Local Centres	Under review	Policy updated - Minor changes to policy aligned to updated evidence base and national policy changes.
Thematic Policies: Transport and Movement		
TR1: Travel Reduction and Modal Shift	Not under review	Policy updated - General update to the policy to include a clearer focus and prioritisation upon public transport, cycling, walking and reducing air pollution.
TR2: Parking Policy	Possible minor changes	Policy updated - Policy updated to increase levels of active travel by integrating cycle parking and facilities in new development and encouraging the use of electric vehicles through the integration of charging points in developments.
TR3: Public Transport, Cycling and Walking	Not under review	Policy updated - Updated policy to take account of the use of electric vehicles as a sustainable mode of transport and the wider sustainability of car use in sustainable travel and thus a more integrated approach to

		sustainable travel is potentially required.
TR4: Transport and Tourism	Not under review	Not under review
TR5: Improving Connectivity and Accessibility	Not under review	Policy updated - Wide ranging updates and refocusing of the policy.
TR6: Freight	Possible minor changes	Policy updated - The policy now includes the need to address inappropriate HGV parking within residential areas is considered a corporate priority, and the Council consider Criteria K. to further support industrial and warehousing sectors by promoting improved freight infrastructure and services.
TR7: Transport Investment and Management Priorities	Possible minor changes	Not under review
TR8 Aircraft Safety	Not under review	Not under review
Thematic Policies: Housing		
HO1: The District's Housing Requirement	Under review	Policy updated - The Preferred Option makes reference to the updated housing requirement figure for the plan period, consistent with the government's standard method approach for calculating Local Housing Need.
HO2: Strategic Sources of Supply	Maybe some consequential amendments	Policy updated - This Policy sets out the sources of supply which the Council will consider to meet the housing requirement set out in Policy HO1. The policy has been updated to bring it in line with the revised strategic priorities of the Core Strategy.
HO3: Distribution of Housing Development	Under review	Policy updated - While Policy HO1 determines the total housing requirement for the district (26,150 new homes between 2020 and 2037) Policy HO3 determines how they will be distributed between the different areas, towns and villages. The preferred approach is to focus most growth on the urban areas where population and household growth is greatest, and where jobs, services and infrastructure are concentrated. It also reflects the scale and distribution of deliverable and developable land, environmental constraints such as wildlife, flood risk and heritage and the need to promote regeneration in certain areas.

HO4: Phasing the Release of Housing Sites	Possible minor changes	Policy updated - The Policy sets out how the Council will manage the delivery of the new homes required in the District. The policy has been updated to remove the section which refers to splitting the Plan period into 2 phases in favour of a focus on delivery and management of the supply to ensure infrastructure is provided.
HO5: Density of Housing Schemes	Possible changes	Policy updated - This Policy sets the Councils minimum density requirement for housing developments. The minimum policy threshold has been raised and strengthened, since the adopted Core Strategy and more emphasis has now been placed on higher development requirements in areas which are well located to amenities and public transport connections.
HO6: Maximising the use of Previously Developed Land	Under review	Policy updated - This policy sets the Councils target for the proportion of new homes which will be built on sites which have been previously developed. There is no change from the District target of 50%, but the proportions for all but the regional city of Bradford tier of the settlement hierarchy have been revised to bring them in line with the housing land supply.
HO7: Housing Site Allocation Principles	Not under review	Not under review
HO8: Housing Mix	Under review	Policy updated - Self-build and specialist accommodation needs added to the policy.
HO9: Housing Quality	Under review	Policy updated - The Preferred Option makes reference to the updated housing need evidence and the Housing Design Guide SPD and identifies targets for optional technical standards required from new development consistent with the revised NPPF.
HO10: Overcrowding and Empty Homes	Not under review	Not under review
HO11: Affordable Housing	Under review	Policy updated - The Preferred Option makes reference to the updated housing need evidence and identifies targets, thresholds and types of affordable housing required

		consistent with the revised NPPF.
HO12: Provision of Sites for Gypsies, Travellers and Travelling Showpeople	Under review	Policy updated - The Preferred Option makes reference to the updated need evidence and identifies targets for the identification of additional pitches to meet need over the plan period and identifies criteria for assessing sites and planning applications consistent with the revised NPPF and national planning policy for traveller sites.
Thematic Policies: Environment		
Policy EN1: Open Space, Sports and Recreational	Not under review	Not under review
Policy EN2: Biodiversity and Geodiversity	Possible changes	Policy updated and split into EN2a and EN2b: EN2a - This is a new policy which builds on the previous Policy EN2. The preferred option strengthens the hierarchical approach to the different nature conservation designations. It introduces a new level of designation – Local Wildlife Networks which allow for the migration, dispersal and genetic exchange of plants and animals. These networks will be protected from fragmentation. The policy also sets out how habitats and species of principal importance will be considered in the determination of planning applications. EN2b - This is a new policy which establishes the requirement for major developments to provide an ecological survey and a biodiversity net gain calculation using the DEFRA/Natural England biodiversity metric. Developments should demonstrate a 10% biodiversity net-gain and show how the on-going management of such measures will be secured. The policy also requires net-gains for minor developments and provides a list of possible biodiversity improvements which can be made. It also considers the impacts on social wellbeing of any biodiversity net-gains that are proposed.
Policy EN3: Historic Environment	Not under review	Not under review
Policy EN4: Landscape	Not under review	Not under review
Policy EN5: Tree and	Possible minor changes	Policy updated - The preferred

Woodlands		option sees the policy updated to ensure that during the construction of new development appropriate buffer zones around existing trees are put in place to reduce the risk of damage. It also requires any trees lost to be replaced on a one for one basis and at a ratio of two for one where mature trees are lost. It also encourages the planting of new native tree species with a view to enhance biodiversity.
Policy EN6: Energy	Possible minor changes	Policy updated - The preferred option has seen some minor changes made to the policy wording to clarify the position with regards to the setting of local requirements for the sustainability of buildings.
Policy EN7: Flood Risk	Possible minor changes	Policy updated - The preferred option has seen the policy strengthened to clarify the application of the sequential and exception tests, require planning applications to be supported by a site-specific flood risk assessment where applicable, introduces the drainage hierarchy and requires major developments to incorporate SuDS. It also clarifies the surface water run-off rates for both Brownfield and Greenfield development and supports proposals for natural flood risk management.
Policy EN8: Environmental Protection	Not under review	Policy updated - This policy has been amended to include additional details relating to the implementation of the Water Framework Directive. In particular it looks to support development which helps to achieve 'good' ecological status of surface and ground water bodies. It also looks to support the opening up of culverts to enhance the natural geomorphology of water courses as well as managing water demand and improving water efficiency in new developments.
Thematic Policies: Minerals		
Policy EN9: New Minerals Extraction Sites	Not under review	Not under review
Policy EN10: Sandstone Supply	Not under review	Not under review

Policy EN11: Sand, Gravel, Fireclay Coal and Hydrocarbons (oil and gas)	Not under review	Not under review
Policy EN12 Minerals Safeguarding	Not under review	Not under review
Thematic Policies: Waste Management		
WN1: Waste Management	Not under review	Not under review
WN2: Waste Management	Not under review	Not under review
Thematic Policies: Design		
DS1: Achieving Good Design	Not under review	Not under review
DS2: Working with the Landscape	Not under review	Not under review
DS3: Urban Character	Not under review	Not under review
DS4: Streets and Movement	Not under review	Not under review
DS5: Safe and Inclusive Places	Not under review	Not under review
Implementation and Delivery Policies		
ID1: Development Plan Documents and Annual Monitoring report	Not under review	Not under review
ID2: Viability	Under review	Policy updated - The Preferred Option reflects recently updated national planning policy and guidance that places greater emphasis on establishing financial viability as part of the plan making process, and sets out the circumstances under which viability of development proposals will be considered at the planning application
ID3: Developer Contributions	Not under review	Not under review
ID4: Working with Partners	Not under review	Not under review
ID5: Facilitating Delivery	Not under review	Not under review
ID6: Simplification of Planning Guidance to Encourage Sustainable Development	Not under review	Not under review
ID7: Community Involvement	Not under review	Not under review
ID8: Regeneration Funding and Delivery	Not under review	Not under review

Appendix 2: Accessibility Standards

The following tables provide guidance for the locational policies TR1, TR3, TR4 & TR5 for the development of employment and social infrastructure uses as well as proposed housing sites.

Where a site does not conform to the accessibility standards at the time of submission it is expected that mitigating measures should be included within the development proposals that would come into effect at the time of initial occupation of the site. These measures may take a number of forms including (but not exclusively), extensions to existing bus services, re-routing of existing bus services, increased frequency of bus services, provision of new bus services, provision of community transport services, community car clubs, community car sharing schemes, improvements to the walking and cycling network (to make distances to public transport shorter), contributions to other public transport provision (including rail) and other innovative accessibility improvements.

Table 1: Accessibility Standards for Employment and Social Infrastructure Uses

	Employment	Primary Health / Education	Secondary Health / Education	Leisure, Retail and Other
Sites located in Bradford Urban Area or extensions to the urban area (Regional Cities, Principal Towns & Local Growth Centres) should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*
Sites located in Local Service Centres should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*

Table 2: Accessibility Standards for Housing and Mixed Use Developments (that include residential)

	To Local Services	To Employment	To Primary Health / Education	To Town Centres / City Centres
Sites located in Bradford Urban Area or extensions to the urban area (Regional Cities, Principal Towns & Local Growth Centres) should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre* Or 10mins walk time (800m)	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre* Or 20mins walk time (1600m)	400m of a bus stop (or 800m of a rail station) offering a service at least 4 times per hour to a town or city centre*
Sites located in Local Service Centres should normally be within;	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre* Or 10mins walk time (800m)	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre* Or 20mins walk time (1600m)	400m of a bus stop (or 800m of a rail station) offering a service at least 2 times per hour to a town or city centre*

* Town or City Centres defined as public transport interchange point, including rail stations, in one of the following centres; Bradford, Leeds, Halifax, Ilkley, Keighley, Bingley or Shipley.

Appendix 3: Parking Standards

Car Parking Standards

The parking standards below are based on the standards set out in the former PPG13 (March 2001) and Regional Planning Guidance RPG12 (Oct 2001), along with alignment with neighbouring authorities standards.

The standards are designed to be indicative and will enable the Council to regulate the provision of parking on developments, whilst being mindful of the need to balance parking with the impact it can have on the environment such as on street parking if left unmanaged.

As per the guidelines set out in the National Planning Policy Framework the level of parking provision will be determined by:

- the accessibility of the development (as assessed against the Accessibility Standards);
- the type, mix and use of development;
- the availability of and opportunities for public transport (as assessed against the Accessibility Standards);
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles. Where appropriate, the Council will seek to minimise the number of spaces provided on site particularly in highly accessible locations such as the City Centre and Principal Town Centres.

Type, Size and Location of Development	Car Parking Standard	ELV Charging
A1 Food Retail (under 500sqm)	1 space per 35sqm	<u>N/A</u>
A1 Food Retail (500-999sqm)	1 space per 20sqm	<u>5% of total car parking space to provide charging points.</u> <u>Minimum of 1 per development.</u>
A1 Food Retail (above 1000sqm)	1 space per 14sqm	<u>5% of total car parking space to provide charging points.</u> <u>Minimum of 1 per development.</u>
A1 Non food retail (above 1000sqm)	1 space per 25sqm	<u>5% of total car parking space to provide charging points.</u> <u>Minimum of 1 per development.</u>
A2 Offices (under 2500sqm)	City Centre, Town Centre and meeting accessibility standards – *minimal operational requirement Remaining 1 space per	<u>City Centre, Town Centre and meeting accessibility standards - 1 per development.</u>

Type, Size and Location of Development	Car Parking Standard	ELV Charging
	10sqm	<u>Other – 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
A2 Offices (above 2500sqm)	City Centre, Town Centre and meeting accessibility standards – *minimal operational requirement Remaining 1 space per 10sqm	<u>City Centre, Town Centre and meeting accessibility standards - 1 per development.</u> <u>Other – 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
B1 Business (below 2500sqm)	City Centre, Town Centre and meeting accessibility standards – *minimal operational requirement. Other – 1 space per 30sqm	<u>City Centre, Town Centre and meeting accessibility standards - 1 per development.</u> <u>Other – 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
B1 Business (above 2500sqm)	City Centre, Town Centre and meeting accessibility standards – *minimal operational requirement. Other – 1 space per 30sqm	<u>City Centre, Town Centre and meeting accessibility standards – 1 per development</u> <u>Other – 5% of total spaces to provide charging points. Minimum of 1 per development.</u>
B2 Industry (above 2500 sqm)	City Centre, Town Centre and meeting accessibility standards – *minimal operational requirement Other – 1 space per 50sqm <u>1 HGV Overnight Parking Space per 20,000sqm.</u>	<u>5% of total car parking space to provide charging points.</u> <u>Minimum of 1 per development.</u>
C2 Hospitals (above 2500sqm)	1 space per 4 staff + 1 space per 4 daily visitors	<u>5% of total car parking space to provide charging points.</u> <u>Minimum of 1 per development.</u>
D1 Higher and Further Education (above 2500sqm)	<u>City Centre and Town Centres – *minimal operational</u> 1 space per 2 staff + 1	<u>City Centre and Town Centres – 1 per development</u> <u>5% of total car parking space to provide charging</u>

Type, Size and Location of Development	Car Parking Standard	ELV Charging
	space per 15 students	<u>points. Minimum of 1 per development.</u>
D2 Assembly and Leisure (above 1000sqm)	City Centre and Town Centres – *minimal operational requirements Other 1 space per 22sqm	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D2 Cinemas and Conference/concert (1000sqm)	City and Town Centres – *minimal operational requirements. Other sites meeting accessibility criteria – 1 space per 5-10 seats. Other sites – 1 space per 5 seats	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D2 Stadia (above 1500 seats)	1 space per 15 seats + coach lay-by parking	<u>5% of total car parking space to provide charging points.</u>
A3 Food and Drink	City and Town Centres – *minimal operational requirements (presumption against). Other sites meeting accessibility criteria – 1space per 5-10sqm Other sites 1 space per 5sqm	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
A4 Public Houses/ Wine Bars	City and Town Centres – *minimal operational requirements (presumption against). Other sites meeting accessibility criteria – 1space per 5-10sqm Other sites 1 space per 5sqm	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
A5 Hot food Takeaway	City and Town Centres – *minimal operational requirements (presumption against) Other sites meeting accessibility criteria – 1space per 5-10sqm Other sites 1 space per 5sqm	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
B8 Storage and Distribution	1 space per 250sqm. <u>1 HGV Overnight Parking Space per 20,000sqm.</u>	<u>5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
C1 Hotels and Guest	City and Town Centres –	<u>City Centre and Town</u>

Type, Size and Location of Development	Car Parking Standard	ELV Charging
Houses	*minimal operational requirements (presumption against) Others 1 space per bedroom	<u>Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
C2 Nursing Homes	1 space per 5 residents + 1 space per 2 staff	<u>5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
C3 Student Halls	City and Town Centres – *minimal operational requirements (presumption against) Other – 1 space per 5 students	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
C3 Dwellings (Non city and town centre)	Average of 1.5 spaces per unit	<u>1 Charging Point per unit, where a parking space is provided. Minimum of 1 per development.</u>
C3 Dwellings (City and town centre)	*Minimal operational requirements	<u>1 per development.</u>
C3 Sheltered Housing	1 space per 4 units + 1 space per 4 units for visitors and staff	<u>5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
C4 Houses Multiple Occupancy	1 space per 2 bedrooms	<u>5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D1 Non residential Health Centres, surgeries	3 spaces per consulting room + 1 spaces per 3 staff	<u>5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D1 Day nurseries & crèches	1 space per 6 children	<u>5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D1 Places of Worship	City Centre and Town Centres – *minimal operational requirements Other - 1 space per 25sqm	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D1 Libraries	City Centre and Town Centres – *minimal operational requirements Other - 1 space per 25sqm	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of</u>

Type, Size and Location of Development	Car Parking Standard	ELV Charging
		<u>1 per development.</u>
D1 Museums	City Centre and Town Centres – *minimal operational requirements Other 1 space per 60sqm	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D1 Primary Schools	<u>City Centre and Town Centres – *minimal operational</u> 1 space per 2 staff + 5 spaces for visitors	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D1 Secondary Schools	<u>City Centre and Town Centres – *minimal operational</u> 1 space per 2 staff + 10 spaces for visitors	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D2 Leisure Sports and Leisure activities, Swimming pools, Tennis/Squash/Bowling	<u>City Centre and Town Centres – *minimal operational</u> 1 space per 2 players/staff 1 space per 5 fixed seats, 1 space per 10sqm pool area, 4 space per court/lane	<u>City Centre and Town Centres – 1 per development</u> <u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D2 Other Uses	Urban 1 space per 22-100sqm Rural 1 space per 22-25sqm	<u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
Auction Rooms, car sales and Garage Forcourts	1 space per 2sqm standing area	<u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
Workshops – staff and customers	1 space per 2 staff, 3 spaces per service bay	<u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
Car sales	1 space per full time staff, 1 space per 15 cars on display	<u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
Private Hire/Hackney Carriage office	Min 5 spaces or 1 space for every 4 cars operating from site	<u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
C3 Hostels	1 space per 4 staff + 1	<u>Other - 5% of total car</u>

Type, Size and Location of Development	Car Parking Standard	ELV Charging
	space per 4 residents	<u>parking space to provide charging points. Minimum of 1 per development.</u>
Filling Stations	1 space per 2 staff	<u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>
D2 Riding Stables/Equestrian Centres	1 space per 2 horses on the yard + 1 horsebox space per 150sqm	<u>Other - 5% of total car parking space to provide charging points. Minimum of 1 per development.</u>

*Minimal operational requirement: Parking that is required for a development to operate as set out in the Transport Assessment or Transport Statement, including but not exclusively; operational parking space for commercial and service vehicles (that provides for manoeuvring space to enable the largest vehicle required to exit the site in forward gear); loading bays and disabled parking. Residential development that requires operational parking, such as residential or care homes, should, as far as possible, make provision within the site. This encompasses servicing, business visitors and employees who require daily access to their vehicles for their jobs. It does not include commuter parking.

Table 2: Disabled Parking Standards and Table 3: Cycle Parking Standards remain unchanged.

Appendix 4: Local Wildlife Sites (LWS) and Local Geological Sites (LGS)

A full list of the Local Wildlife Sites (LWS) and Local Geological Sites (LGS) will be provided at the Regulation 19: Publication draft stage.

Appendix 5: Suggested Biodiversity Improvements

The list of suggested biodiversity improvements which can be used in new developments is still in preparation. A full list of possible improvements will be made available for comment at the Regulation 19: Publication draft stage.

