

Planning Policy Team,
Bradford Metropolitan District Council
Britannia House,
Hall Ings, Bradford
BD1 1HX

23rd September 2019

We have submitted our comments through the online Questionnaire, but this document is a record of our comments regarding the Bradford Core Strategy Partial Review Preferred Options consultation. CPRE welcomes the opportunity to comment on the Preferred Options. Our comments at this stage are brief. We look forward to contributing further as the review progresses.

General Comments

We are delighted that Bradford chose to widen the scope of the CSPR on the basis of responses to the scoping report consultation. This has created the opportunity for a revised Core Strategy which represents a huge step in the right direction, for which Bradford Council must be greatly commended.

It sets an example to neighbouring authorities by moving away from the unrealistic relationships between wildly ambitious economic growth projections and wilfully excessive housing targets which have characterised Local Plans across West Yorkshire and beyond for a number of years. This will result in a more measured, evidence-based Plan that is much more likely to meet genuine needs for development, and is not burdened by unachievable land supply requirements that place needless pressure on greenfield land.

The draft also takes a much emboldened approach to tackling climate change, liveable neighbourhoods, creating healthy places and green infrastructure. Taken together, these changes create a holistic, strategic direction for Bradford that shows true leadership, and should be an exemplar to other local authorities.

It is not all good news, however. Despite the high ambitions, there is no clear pathway by which quantifiable reductions in greenhouse gas emissions will be achieved either at the strategic or individual levels. Most damingly of all, the Council appears to remain wedded to a new road in South-East Bradford, to the growth of Leeds-Bradford Airport, and to the ‘unlocking’ of development land in those areas, without any clarity as to how such development would contribute positively to the laudable strategic aims for climate action and placemaking. Alongside this, the proposed urban extension at Holme Wood is repeatedly described as ‘sustainable’, without any evidence provided of how



sustainability would be achieved or measured, and indeed with no lines on a map to enable anyone making a representation to make an informed analysis.

It might, theoretically, be possible for additional road capacity and an urban extension, both impacting on the openness and amenity of the Green Belt between Bradford and Leeds, to be delivered in a way that is demonstrably sustainable, acceptable to the community and consistent with meaningful climate action. But it will be very difficult to do so, and in our view the Council must provide very clear, compelling evidence of how that might be achieved, if those aspects of the Plan were to be considered sound and legally compliant.

On the basis of the evidence before us, the SE Bradford Relief Road and the Holme Wood urban extension appear to run counter to NPPF Para 148's requirement to '*shape places in ways that contribute to radical reductions in greenhouse gas emissions*' and would directly harm the Council's ability to meet its obligations in relation to the Climate Change Act 2008 and the UK's commitment to net zero carbon by 2050. Further, it is not possible to conclude that exceptional circumstances exist for removing land from Green Belt when the resulting development runs a high risk of undermining climate action. These aspects of the draft Plan should therefore be deleted and the Plan revised accordingly.

Responses to Consultation Questions

Strategic Core Policies

Policy SC1: Overall Approach and Key Spatial Priorities

Referring to NPPF Para 148's requirement for the planning system to '*shape places in ways that contribute to radical reductions in greenhouse gas emissions*', nowhere can this be more comprehensively addressed than in the headline strategic and spatial priorities of Local Plans.

SC1 does not achieve this requirement, because:

Part 8 merely describes a 'move towards a resilient low-carbon future', and there is no specific explanation of how radical GHG reductions are to be achieved through the measures in the policy;

Part 4 links the spatial priorities of Bradford to the future of Leeds Bradford Airport in a way which implies the growth in both the usage and the importance of the airport, and there is no analysis of how this can be achieved in a way that is compatible with SC1(8) and SC2.

Policy SC2: Climate Change and Resource Use

We warmly welcome the strengthening of this policy, and the scope it provides for climate action across the range of policy topics in the Plan. However, there is no carbon reduction target to support the policy, other than that included in the District's Climate Change Framework. This refers to a target of 40% reduction by 2020, against a 2005 baseline, so evidently that target is out-of-date.

It is worth examining here the scale of the challenge. We know that the vast majority of CO₂ reductions to date have arisen from the decarbonisation of industry, and that residential and transport emissions are stubborn to change. Let us make some approximate calculations from the available evidence.

- The Plan provides for 28,951 new homes over the Plan period.
- The SHMA indicates a population growth over the Plan period of 12,367 people.
- The Bradford Climate Change Framework states that the District's carbon footprint is currently 5.8 tonnes per person per year.

Dealing first with housing growth, the Energy Saving Trust's Clean Growth Plan shows that, without a '2050-ready' policy for the carbon footprint of new homes, additional growth over a 12 year period to 2032 emits 15.4 tonnes CO₂ per homes, which would be avoided by adopting a 2050-ready policy. So a 'business as usual' new homes policy in Bradford would result in approximately 15.4 tonnes x 28,951 homes = 445,845 tonnes over 12 years. By that calculation, there is a potential additional CO₂ footprint of new housing in Bradford of 3 tonnes per year per new head of population over the Plan period.

Turning to road traffic, standard TRICS data shows that each new home generates around 6 additional vehicle movements per day. The UK Travel User Survey shows that the average car journey (2017) is 8km in distance, so 'business as usual' would result in 28,951 homes generating 173,706 new vehicle movements per day, totalling 1.4 million km per day. Average tailpipe emissions are currently around 130g per km, giving 180,654kg/day, or 65,939 tonnes per year. Thus, the total impact of this additional road traffic on Bradford would be running at 5.4 tonnes CO₂ per year per new head of population by 2037, based on tailpipe emissions only.

Electric and hybrid vehicles currently account for 1.5% of all vehicles on the road. Whilst their share of new vehicle sales is expected to increase very significantly over the Plan period, their share of total vehicle stock will of course take much longer to increase. Further, when lifecycle emissions are taken into account, conventional vehicles have a footprint about double their tailpipe emissions (ie about 250g per km), and electric vehicles generate about 110g per km. So we must conclude that the impact of switching to electric vehicles on CO₂ per head per year over the Plan period will be very marginal.



Being generous by not including lifecycle emissions from vehicles, we can therefore estimate that, without specific policy interventions, the projected population increase in Bradford over the Plan period will be burdened with a footprint of $3+5.4 = 8$ tonnes CO₂ per person per year, or 99,000 tonnes per year in total. This is a 3% increase compared to the baseline in the Climate Change Framework.

Given the evident ineffectiveness of electric vehicles to reduce total emissions during the Plan period, we can conclude that there are only really four Core Strategy policy interventions that will work to achieve CO₂ reduction:

- 1) Ensure all new homes are '2050-ready' (this should of course be extended to commercial buildings, and an equivalent target set for retrofitting);
- 2) Significantly reduce the number of car journeys being made;
- 3) Significantly reduce the distance being travelled by car;
- 4) Sequester carbon through trees, soils and peat ecosystems.

Consequently, if the Core Strategy is to contribute to carbon targets and to be found sound in relation to NPPF Para 148, then these four interventions should be made explicit in Policy SC2 and should follow through into the rest of the Plan.

Policy SC5: Location of Development

Subject to our comments on SC3 and SC7, which would have implications for SC5, we support this policy. The location of development should be very carefully determined to achieve a meaningful reduction in number and length of car journeys and a significant increase in walking and cycling and use of public transport. This would necessarily result in a rewording of SC5(B), and a much clearer basis for showing which greenfield and, potentially, Green Belt locations could be considered to implement Policy SC2 and NPPF Para 148.

Policy SC6: Green Infrastructure

We welcome the changes to this policy. We note that Policy EN1, which is not reviewed within the CSPR, refers to Country Parks in the Green Belt, and NPPF Para 141 sets out the need to harness Green Belt as a resource for open space amenities. We would like to see these opportunities reflected in SC6, because in the district the Green Belt is a powerful policy to keep the countryside within reach of communities, but its accessibility and the amenities it is providing need to be enhanced.



We would also wish to see a strategic approach to increasing street trees in SC6, particularly in relation to SC2 and SC10.

Policy SC7: Green Belt

The evidence has not been provided to show that the developments resulting from Green Belt changes will be genuinely sustainable. Releasing Green Belt to enable unsustainable outcomes is not justifiable.

It is CPRE's position that exceptional circumstances for Green Belt change cannot be adequately demonstrated unless a positive outcome can be shown for the Plan's strategic objectives as a whole, not just the meeting of numerical development requirements. Consequently, SC7 should stipulate that Green Belt changes will result in measurable benefits against Policies SC2 (Climate Change), SC6 (Green Infrastructure) and SC10 (Healthy Places). This is especially important given that Green Belt sites tend to be more peripheral and therefore less accessible to settlement centres by foot and cycle.

Safeguarded sites must also be capable of being fully consistent with all the strategic objectives, therefore sites – for example - whose development would be predicated on future road schemes, or whose development would compromise the Green Infrastructure network, are not appropriate choices for safeguarding.

We have grave concerns about the proposed Holme Wood urban extension that is described in paras 3.14.21 to 3.14.23. The draft Plan repeatedly uses the term 'sustainable' in relation to this proposal, but without evidence or analysis of how its sustainability is shown. In our view, SC2, SC6 and SC10 provide the key tests of sustainability – will a development create healthy, low-carbon places with excellent green infrastructure? Therefore the Plan needs to explain how Holme Wood will deliver on SC2, SC6 and SC10 in absolute terms, and also in relative terms compared to alternative spatial options. If it cannot do this convincingly, then we must conclude that exceptional circumstances to change the Green Belt to allow for the Holme Wood extension have not been shown.

Policy SC10: Creating Healthy Places (New Policy)

We give this policy our wholehearted support.

Sub Area Policies

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

This policy should be reviewed in the light of our comments about the Holme Wood proposals (see CQ7). We are also very unhappy with the liberal sprinkling of the word ‘sustainable’ through this policy, with no clear rationale for how this is to be evaluated.

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

We object to part E of the policy, which appears to conflate new highway infrastructure with the delivery of a ‘sustainable’ urban extension, without any explanation of how the inevitable increase in road traffic will be reconciled with Policy SC2 or SC10.

Other sub-area policies

A range of modifications may be needed to these policies to reflect our concerns about the strategic policies, but aside from those we are broadly supportive of the sub-area preferred options.

Economy and Jobs

Policy EC2: Employment Land, Jobs and Skills Requirement

With reference to para 5.6.9, it is unclear how the M62 Enterprise Zone is considered to be compatible with a low-carbon future as set out in Policy SC2 and NPPF Para 148. Further, there is no shortage of on-the-ground evidence that the place-making qualities of motorway-base employment zones are sorely lacking, being far removed from where people live, overwhelmingly accessed by car, with few other amenities or mixed uses and a tokenistic approach to open space and green infrastructure. Further, the cumulative effect of nearby motorway-based developments in adjacent local authorities has resulted in a dramatic loss of openness between the urban areas of West Yorkshire, with very large volumes of road traffic and resulting physical barriers in the landscape.

Considering that Bradford’s EZ sites are existing allocations, there is an implication in the Plan that their development will proceed regardless of new strategic objectives. In our view it is imperative that employment locations – which are, after all, where many people are envisaged to find work – are planned as good quality places with amenities and good active travel choices, not just as patches of land for developments.

To address this we suggest an additional policy on 'placemaking for employment'. We would be happy to assist in devising a form of words for that policy.

Transport and Movement

Policy TR1: Travel Reduction and Modal Shift

Referring to our comments on Policy SC2, we believe it is self-evident that for the Plan to address climate action it must set out measures to:

- 1) Significantly reduce the number of car journeys being made;
- 2) Significantly reduce the distance being travelled by car.

The UK Travel User Survey 2017 indicates that 80% of journeys under 1 mile in length are made on foot, while for all journeys longer than a mile the private car is the dominant mode of choice. Cycling has only a tiny modal share, but assuming a comfortable cycling range of around 5 miles, there is no doubt that busy roads, hostile to cyclists, are a major barrier.

In this context there is no escaping that Policy TR1's purpose – travel reduction and modal shift – must in fact boil down to three types of policy intervention:

- a) Securing a major increase in the number of people whose day-to-day amenities are accessible within a 0.5 mile radius (1 mile round trip) of their homes;
- b) Re-prioritising road space both within communities and along popular travel routes between communities, centres and workplaces, for active travel and public transport;
- c) Designing the public realm and the interfaces between different modes so that walking and cycling become a realistic and attractive option for an increasing proportion of journeys.

We recommend that TR1, which is currently rather protective in its stance, should be revised to embrace these three pro-active interventions, and the linkages to other policies - for example land-use, design, healthy places, made much more explicit.

Policy TR2: Parking Policy

A key missing aspect of this policy is the huge waste of land that results from low density edge of town commercial developments with large – and usually free – surface car parking. This also causes land uses to become more dispersed and less walkable, and limits green infrastructure opportunities.



With this in mind we recommend a presumption against surface car-parking and a requirement for new developments to harness opportunities to integrate parking with higher-density buildings, mixed uses, green infrastructure and on-site renewable energy provision.

Policy TR3: Integrating Sustainable Transport and Development

We support the changes as an improvement to the policy, though it does not go far enough. In common with our comments on TR1, TR3 should be unpinned by the principle that a required outcome of development must be to make active travel a realistic and attractive modal choice for an increasing share of journeys. Parts of the policy do give some expression to this principle, but without any strategic sense of scale or direction. Our recommendations for the policy are:

To ensure that new developments include sufficient premises for key amenities to be accessible within a 0.5 mile radius of homes;

Using new development to improve the walkability of existing neighbourhoods;

Designing roads and public realm to favour cyclists and walkers.

Policy TR5: Strategic Transport Delivery

We object to part C of the policy for the following reasons:

C1 must address the need to reallocate road space and junction priorities to actively encourage public transport and active travel – otherwise the policy will run directly counter to SC2 and SC10.

C2 must show how any new highway schemes will actively and measurably contribute to reducing CO₂ emissions. Where highway schemes are designed to unlock sites for housing and employment development, it must also be demonstrated that these developments will provide healthy, sustainable, low-carbon places in compliance with SC2 and SC10. Highway schemes and associated developments that cannot demonstrate this compliance should be deleted from the Plan.

Given the relative remoteness of Holme Wood, its association in the Plan with new highway development which we believe will be profoundly unsustainable, compounded by the lack of any detail as to how a development at Holme Wood could be realised in a way that did not severely harm the landscape of the Tong Valley, it is increasingly apparent that this proposal is anomalous to the rest of the Plan and should be removed, along with the South East Bradford link road.

Housing

Policy HO1: The District's Housing Requirement

The changes to this policy are broadly in line with our previous representations, and bring much-needed realism to the challenge of meeting housing need. Consequently we support this policy. We particularly support the inclusion of a windfall allowance.

Policy HO2: Strategic Sources of Housing Supply

In line with our responses to other questions, it is not good enough to simply refer to the proposed Holme Wood urban extension, or to other proposed Green Belt changes, as 'sustainable'. The sustainability credentials of these proposals must be clearly demonstrated, particularly in relation to policies SC2, SC6 and SC10.

Policy HO3: Distribution of Housing Development

In line with previous representations on housing density and Green Belt change, we would support an alternative preferred option that is a hybrid of alternatives (4) and (5). To reiterate our point made at the Scoping Report stage, there is abundant evidence that net densities below 45 dwellings per hectare do not provide sustainable development, as they do not support walkable facilities and public transport. A key role of new development is therefore to raise the density of neighbourhoods in order to make them more sustainable. Consequently, our position is that:

- Unless justified by a specific local need, all new development should be at a minimum of 45dpha net, and a minimum of 60dpha close to public transport nodes and urban centres;
- Sites not considered suitable for those densities should not be allocated;
- Overall land-take of development allocations can be reduced by around one-third if the working density is increased from 30dpha to 45dpha, and this should be reflected in any justification for Green Belt change.

Therefore it will be understood that our recommendation of a significant density uplift does not necessarily preclude Green Belt change, but it does mean that any Green Belt changes must be focused on enabling developments that bring clear benefits for sustainability, carbon, walkability and green infrastructure compared to the alternatives.



We note that the proposed Holme Wood extension is significantly further away from railway connections than many of the other proposed development locations, and we cannot sanction any urban extension that does not have rail access within 30 minutes' walk.

Given the relative remoteness of Holme Wood, its association in the Plan with new highway development which we believe will be profoundly unsustainable, compounded by the lack of any detail as to how a development at Holme Wood could be realised in a way that did not severely harm the landscape of the Tong Valley, it is increasingly apparent that this proposal is anomalous to the rest of the Plan and should be removed, along with the South East Bradford link road. The housing distribution would therefore need to be adjusted accordingly, and in our view most of this could be achieved by more ambitious density uplifts rather than by additional sites.

Policy HO5: Density of Housing Schemes

We welcome the proposed increase in density expectations. However, part A of the policy contains a clause that is inconsistent with the rest of the Plan. The text states: '*All developments should achieve a minimum density of 35 dwellings per hectare, and at least 50 dwellings per hectare net in areas which are well served by public transport and local amenities.*' But it is self-evident from the other policies in the Plan that development should not take place in areas not well-served by public transport and local amenities, because otherwise they would be unsustainable. This goes all the way back to the Spatial Objective 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*'. And Policy SC2(7) **requires** '*new development to be located and/or positioned in sustainable well-connected locations...*'

It is true, of course, that there may occasionally be justification for developing a site at a lower density. This might be a windfall site or an exception site, where there was a good reason on balance to develop it, but it was not suitable for a density of 50 dpha. Clearly, these should be the exceptions rather than the rule.

We would therefore wish to see policy HO5(A) re-written as follows:

All developments should be in areas well served by public transport and local amenities, and should achieve a density of at least 50 dwellings per hectare net. Lower densities, down to a minimum of 35 per hectare net, may be permitted in exceptional circumstances, where there is a compelling case for a development to meet a specific local need on a site not suitable for 50 dwellings per hectare.



Policy HO9: Housing Quality

We support the changes, but, in line with our comments on Policy SC2, we consider that HO9 should require all new housing development to be '2050-ready' as defined by the Energy Savings Trust report *The Clean Growth Plan*. <https://www.energysavingtrust.org.uk/clean-growth-plan-2050-ready-new-build-homes-policy>

Environment

Policy EN2a: Biodiversity and Geodiversity

We warmly welcome and support the changes to this policy, which embed a much-improved approach to achieving net gain.

Policy EN2b: Biodiversity and Development

We warmly welcome and support the changes to this policy, which embed a much-improved approach to achieving net gain.

Policy EN5: Trees and Woodland

We broadly support the changes to the policy, but it can be improved in two ways.

1. We wish to see the inclusion of a policy for street trees, considering the range of benefits they can bring in terms of carbon, air quality, urban cooling and healthy places.
2. In Part C of the policy, there is a need to make a clear linkage to the role of trees in carbon sequestration, flood management and removing pollutants. This is well articulated by the University of Leeds 'i-Tree' report, which found that the 1,400 trees on the University campus were storing 540 tonnes of carbon, equivalent to the carbon footprint of 180 UK citizens, and capturing a further 18 tonnes every year. In relation to the campus trees, the report recommends the following actions:
 - *plant long-lived, large canopy, tree species in locations where soil volume is sufficient for them to grow to their full size*
 - *increase campus canopy cover from 17% to a minimum of 20%*
 - *plan for the potential loss of 8% of the campus trees due to Ash dieback*



- *protect the existing mature tree stock by a continuation and adoption of good practice measures in tree care and management*

The report also states '*When a mature tree is removed, the loss will be compensated by planting three new saplings on campus. We found that it can take around **25 years** for those three trees to be generating equivalent benefits to the mature tree they replaced.*'

<https://leaf.leeds.ac.uk/i-tree-leeds-putting-a-value-on-the-citys-trees/>

Considering that this report is up-to-date and well-evidenced, we would recommend these actions being reflected in EN5(C) and, in particular, that young trees should replace mature trees at a ratio of 3:1, not 2:1 as proposed in the Plan.

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