

1. The Headlines: Key Features of a Strategic-level 'Reasonable Alternative'

- 1.1 If the Council considers it could accommodate an urban centres uplift – which would effectively mean a major shift in housing distribution towards urban Bradford - then there must be brownfield land available to bring forward for it. **The reasonable alternative is therefore to plan for that shift in spatial distribution anyway, in order to maximize the use of brownfield land across the district, and thereby to more properly meet the expectations of NPPF para 137.**
- 1.2 West Yorkshire has a political commitment to net-zero carbon by 2038, which is the end of this plan period. We know that achieving this will require a 21% absolute reduction in car mileage over that period, so this should be adopted as a measurable target for the Plan. **The reasonable alternative is therefore to adopt that target, and ensure that strategic, thematic and development management policies all integrate to achieve it.**
- 1.3 Due to the climate target it is also self-evident that *all* plan-supported economic development over the plan period must be low or zero-carbon. This means growth related to the Airport is anomalous, and support needs to be specifically targeted at helping priority sectors to decarbonize. **The reasonable alternative is therefore a spatial strategy that does not regard the Airport and its access corridor as a growth location, and specifically designs the overwhelming majority of employment land provision to suit the needs of low carbon enterprises and existing businesses wishing to decarbonize.**
- 1.4 On the basis that any site allocation in the Regional City, Principal Towns or Local Growth Centres must necessarily fulfil policy SP7(1c), *all* allocated sites must be capable of and suitable for development at a minimum density of 50dpha. Our initial calculations indicate this would roughly halve the greenfield land requirement, even if the district-wide proportion of 50% of housing on brownfield land were unchanged. **The reasonable alternative is therefore to measure housing land requirement by land area, rather than number of dwellings, and to allocate only enough land to meet the housing requirement at 50dpha net as a baseline. Without this it is not possible for the Plan to show that the requirements of NPPF para 137 have been met, to justify Green Belt release.**
- 1.5 The South East Bradford Access Road is a scheme directly at odds with the Plan's climate targets and objectives to reduce road traffic, would be uniquely damaging to the Green Belt and would disproportionately harm access to the countryside for the most deprived neighbourhood in the district. It is also conspicuous by its absence from the Plan's proposals, despite references to its relationship to the Holme Wood broad location for growth. **The reasonable alternative is to plan on the basis that this road should not, and definitively will not, be built.**
- 1.6 There are several aspects of environmental net gain that are required by NPPF but not robustly planned for in the draft Plan. These include enhancing the beneficial use of the Green Belt, and ensuring new development reduces flood risk. **The reasonable alternative sets these as strategic priorities for the district.**

1.7 We have also identified that a substantially reworded Policy SP4 for the location of development would be the central change to the Plan that would enable several of our suggested reasonable alternatives to be applied together.

2. The Detail

2.1 CPRE has identified that the Draft Plan does not properly consider reasonable alternatives to the policies proposed. In most cases, the alternatives presented are merely whether policies should contain more or less detail, within the same underlying approach.

2.2 The Plan is required to show how it has considered and assessed reasonable alternatives. Whilst it has correctly identified key challenges for the district, there is no evidence that alternative strategies for how to address these challenges have been considered.

2.3 The Local Plan review is in a position to respond to how the national policy context has changed since the adoption of the Core Strategy. The principal changes are as follows.

3. Changes to calculations of housing need

3.1 Firstly, the overall housing target requirement is lower, at 1,700 per year, although the government has now also introduced a 35% uplift for large urban centres. The Council's position is that the additional homes should go into Bradford city itself, rather than being added on to the general housing target for the district – where it would tend to create pressure for additional greenfield and Green Belt sites.

3.2 This is an approach which CPRE would support, because a policy intervention targeted at major urban centres must necessarily boost development within those centres, not on peripheral sites; otherwise the numerical uplift would produce a counterproductive outcome. However, by implication, if inner urban sites exist to achieve the 35% uplift – a further 10,700 homes – then *either* those sites are already capable of coming forward within the plan period, in which case they should be used as a source of supply for meeting the housing requirement, *or* they are sites which it is preferable not to develop, for example because of unacceptable impacts on public open space within existing neighbourhoods. Alternatively, it may be that Bradford envisages meeting this supplementary target through urban remodeling – revitalizing and repopulating neglected neighbourhoods, as proposed by URBED in their vision for Sheffield [ref]. This would be a very positive step but, again, if it can be delivered within the plan period then it should already be factored into sources of supply.

3.3 If the Council were to provide for the 35% uplift (around 10,000 homes) in a way that fulfils the expected urban centre focus, this would amount to a significant shift in the spatial distribution of housing towards the urban centre. By implication, this suggests that the current 50% brownfield target for the district does

not reflect the total amount of brownfield land across the district, but rather that the Council has chosen to distribute development to the other levels of the settlement hierarchy in a way it considers reflects the development needs of the other settlements, but does not necessarily maximize the district-wide use of brownfield land. Conversely, it may be that a greater concentration of development towards central Bradford might risk a harmful impact on urban green space; but this could be addressed by an urban remodeling approach, for example redeveloping in areas currently occupied by low-rise, low-density, car-based retail with large areas of surface parking.

4. The Climate Emergency and road traffic reduction

4.1 Bradford has declared a Climate Emergency, and West Yorkshire has published an important report, *West Yorkshire Emissions Reductions Pathways*. Taken together, these mean that by 2038 – the end of the period for this new Local Plan, Bradford should be at net zero carbon, and we know that to achieve this they need to achieve some huge transformations, such as a 20% reduction in car mileage. Bearing in mind that big picture measures like the West Yorkshire mass transit system, and the large-scale take-up of electric vehicles, won't really have a big impact on emissions until after 2038, then Bradford has a lot of work to do to tackle emissions through other means before then, and achieving major reductions in traffic is a big part of that.

4.2 New housing developments are presumed to generate 5 to 7 additional vehicle movements per day, so meeting the housing requirement is set to generate between 153,000 and 215,000 additional trips by the end of the plan period compared to now. This is plainly, unequivocally at odds with the WYERP requirement to reduce traffic in absolute terms by 21% over the plan period. Of course, it is not enough simply to set a target for new developments to generate 21% fewer trips themselves, as this would result in total trips still increasing by between 121,000 and 170,000 over the plan period. Absolute traffic reduction means that all new developments must be regarded as traffic-reducing interventions; and even if the 21% target were not met, the direction of change needed is clear. In this context the demand reduction principles set out in policy SP7(1) are crucial, and must be rigorously implemented, and we will now consider what that actually means.

SP7(1a) Maximising the efficient use of land by building to the highest possible densities, especially near public transport hubs and sustainable transport corridors.

4.3 Based on policy SP3 settlement hierarchy, we know that one of the defining features of both Principal Towns and Local Growth Centres is their functions as transport hubs – and although this is not stated for the Regional City it is self-evidently a transport hub. So to fulfil SP1(7.1) it follows that *all* site allocations in levels 1 to 3 of the settlement hierarchy should be near to public transport hubs, and should therefore be built to the highest possible densities.

4.4 Policy HO2(C) states that *“Development within locations including town and district centres and in areas which are well served by high frequency public transport and local amenities will be expected to achieve*

densities of at least 50 dwellings per hectare..." Again, since this directly mirrors the definition of Principal Towns and Local Growth Centres, there is a clear rationale that *all* site allocations in those settlements should achieve at least 50dpha, unless there is a specific local justification to do otherwise – which we should therefore reasonably expect to be the exception.

SP7(1b) Incorporate a mix of uses to ensure high levels of accessibility to a number of services to reduce the need for users to travel elsewhere to access them

- 4.5 This is essentially about enabling and requiring new development to contribute to the 15-minute neighbourhood principle by building and reinforcing a mix of uses. In this context we would expect to see a substantial proportion of new site allocations being identified as mixed-use, and also to see many residential site allocations specify a requirement for complementary uses as a development expectation for the site.

SP7(1c) Locate development within locations with the greatest level of existing or planned accessibility by sustainable transport modes and...support car-light development in sustainable locations.

- 4.6 Once again, looking at the cross-compatibility of this policy with the settlement hierarchy, it is evident that *all* development should enjoy high accessibility by sustainable modes, and *no* development should be in locations that are not sustainable. Therefore *any* site allocation should be capable of supporting car-light development.
- 4.7 SP7(1d) and (1e) are givens for any development.

SP7(1f) Maximise the opportunities to co-locate residential and employment development

- 4.8 This complements SP7(1b): whereas (1b) is about ensuring a mix of uses within developments, (1f) is more about ensuring that residential and employment allocations are, where possible, located in close proximity; so we would not expect to find settlements with only residential allocations and no employment ones, or vice versa.

5. Making effective use of land

- 5.1 We have dealt above with the significance of increasing development densities in order to achieve substantial reductions in car use and car dependence. Density is also of concern in relation to a third key policy change: NPPF2019 takes a much stronger line on making effective use of land than did NPPF2012, and we should therefore expect the draft Plan to take a demonstrably stronger approach than its predecessor.
- 5.2 NPPF's approach to density is set out in paras 122 and 123, and this feeds into para 137 in assessing whether exceptional circumstances exist for Green Belt change. The sequential expectation of para 137 is

that the Local Plan should work through three steps before concluding that exceptional circumstances exist:

- Show that it has optimized the use of brownfield sites and underutilized land;
- Show that it has optimized density;
- Examine opportunities for accommodating development in neighbouring authorities.

- 5.3 Clearly, this should ensure that Green Belt is only released if it is unavoidable. It should *also* result in less land being needed overall and also more compact, walkable neighbourhoods where people are less dependent on cars.
- 5.4 There is a further step, which is not stated in NPPF para 137, but is self-evident when considering NPPF as a whole: once a site is removed from the Green Belt and allocated for development, it becomes subject to all the other relevant development expectations. Therefore any sites allocated from the Green Belt must be:
- Compatible with the settlement hierarchy;
 - Suitable for development at the densities required by policy HO2;
 - Compatible with the principles for sustainable transport in policy SP7.
- 5.5 In other words, even if exceptional circumstances for Green Belt release are demonstrated, then only sites that are able to be served by high frequency public transport, contribute to 15-minute neighbourhoods and are suitable for development at at least 50dpha should be released from the Green Belt. To do otherwise would be to release sites from the Green Belt that do not effectively implement the strategy.
- 5.6 We consider, however, that Bradford has not genuinely fulfilled the sequential requirements of NPPF para 137. This is because it appears the settlement hierarchy has been applied before the para 137 tests, rather than after, as follows:
- The distribution of the housing requirement across the settlement hierarchy has been established;
 - The availability, suitability and capacity of brownfield sites within each of the settlements in the hierarchy has been calculated, leaving a residual amount to be met on greenfield sites, firstly within the settlements and then on Green Belt sites.
- 5.7 For each site, it appears that the assessed capacity of the site has been informed mainly by the SHLAA which, of course, is in turn informed by landowner/developer indications of their preferred density.
- 5.8 CPRE does not have the capacity to assess every site, so we need to make some assumptions here. Our assumptions are:
- That the capacity of all brownfield sites identified in the Plan are calculated at 50dpha net;
 - That across all sites there is an average of 25% undevelopable area, so 50dpha net translates to 40dpha gross;

- That the Plan has identified all the brownfield sites in the district that have a reasonable prospect of coming forward for development during the plan period.
- 5.9 As per policy SP8(H), if 50% of the allocation sites are brownfield across the district, then they account for 13,065 new homes, which at 40dpha gross requires around 327 ha of land.
- 5.10 Since, as we established above, any policy-compliant greenfield site should also be built to at least 50dpha net, we would expect 14,607 dwellings to require a further 365 ha of greenfield land.
- 5.11 However, if in fact all of the greenfield sites averaged the general minimum density of 35 dhpa net, which equates to 28dpha gross, then the same 14,607 homes would require 522 ha of land.
- 5.12 We have so far looked in detail at 25 greenfield sites in the draft Plan, of which the majority are to come from Green Belt. These 25 sites have a total area of 160 ha, and a total indicative capacity of 3,640 dwellings – a gross density of 23dpha – which suggests a net density of around 29dhpa. If this pattern were to prevail across all greenfield sites, in the plan, then 14,607 homes would require 635 ha.
- 5.13 Consequently, even if the district-wide brownfield rate remained at 50%, it appears that the proposed greenfield land take in the Plan is approaching double what it would need to be if all greenfield development were built to the policy-compliant 50dhpa net. **In other words:**
- **roughly half of all the proposed greenfield land allocation is a product of low densities, not of meeting development need;**
 - **the majority of Green Belt housing allocations are proposed to be developed well below the densities required by the Plan's policies relating to density.**
- 5.14 This being the case, then the exceptional circumstances for Green Belt releases have not been demonstrated, because the resulting allocations will be profligate in their use of land and will directly fail to implement key sustainability policies in the Plan.
- 5.15 Further, if our assumptions are correct that all the brownfield sites in the Plan will achieve 50dpha net, then only 37% of housing development land allocated in the Plan as a whole is on brownfield land.
- 5.16 We are not disputing that settlements at all levels of the hierarchy should be enabled to have a quantity and type of development that meets their needs. Furthermore, if some of those settlements are better served than others by public transport, and contain some sites that are more suited than others to implementing 15-minute neighbourhoods, then this does create a justification for adjusting the distribution between settlements to facilitate those sites being developed.
- 5.17 However, we cannot accept that the Plan's approach to making efficient use of land is compliant with NPPF 137 when it appears so profligate in greenfield land take and its consequential impact on the Green

Belt. And we cannot see how the proposed site allocations, taken as a whole, will be suitable for the implementation of key policies in the Plan, especially SP7 on sustainable travel and HO2 on density.

5.18 In our view the important first step towards redressing this problem is to measure housing land requirements by land area, rather than by the indicative capacities that are derived from market preference.

6. Inequalities

6.1 The five purposes of Green Belt include preventing the merger of towns and safeguarding the countryside from encroachment. In this context it is deeply ironic – as well as plainly wrong – that the largest single loss of Green Belt proposed in the whole Plan should be in the already narrow stretch of Green Belt between the cities of Leeds and Bradford, in the Tong Valley.

6.2 The adjacent community of Holme Wood suffers from significant social deprivation, and there is no evidence offered as to how building an urban extension next to Holme Wood would address the needs of that community. At the same time, the scale of countryside loss within this Green Belt pinch-point means that the social impacts of losing access to countryside and green infrastructure falling disproportionately on this already disadvantaged community.

6.3 The Plan *appears* to say (para 5.3.26) that the Holme Wood urban extension is co-dependent with the South East Bradford Access Road (SEBAR), yet the SEBAR is absent from the Plan as a transport proposal. This is a serious problem, because:

- The SEBAR is an out-moded, anomalous and wholly unsustainable proposal that would directly undermine many other objectives of the Plan in terms of reducing road traffic and promoting walking and cycling;
- The SEBAR would bisect the entire Green Belt between Leeds and Bradford, causing physical separation and significant landscape impact in its own right, and also generating pressure for further built development along the road corridor;
- If successful development of site allocations within the Plan is dependent on a road scheme that is not, in itself, in the Plan, then those site allocations cannot be deemed to be deliverable;
- The SEBAR – as with most major road schemes passing through or near to deprived communities – is likely to have a predominantly negative impact on Holme Wood Estate residents, who will experience the negative impacts of countryside loss, noise and air pollution to a much greater extent than any other community, without being able to benefit from improved mobility.

6.4 The Airport

6.5 Whilst the airport is of course an existing feature of both the West Yorkshire economy and the pattern of land-use and travel, it is a plainly anomalous feature of a low-carbon future for the district. And whilst aviation-related emissions remain outside the Council's responsibility, this also means that possible future

moves towards low-carbon aircraft cannot be regarded as contributing towards West Yorkshire achieving its net-zero 2038 target.

6.6 On the other hand, promoting the airport as a key asset for economic growth, and thereby of the spatial strategy for Bradford, as Policy SP2 currently does, locks in a degree of economic dependence upon a uniquely high-carbon activity, and influences land-use by providing a supposed justification for greenfield, road-based development between the city and the airport, including Green Belt. In the event that low-carbon aviation cannot be achieved rapidly enough to meet carbon budgets, significant contraction of the aviation industry may be inevitable, and Leeds Bradford will remain relatively inaccessible by public transport compared to several other regional airports, especially Manchester. The combination of this uncertain future and the reliance on a high-carbon sector as an economic driver create a situation which is, in CPRE's view, unsustainable, and promoting growth on that basis does not provide exceptional circumstances for releasing Green Belt land. It is imperative that an alternative strategy be considered that is not contingent on the airport.

7. Environmental Net Gain

- 7.1 Whilst net gain as a technical concept stems from biodiversity policy, there are at least 10 different references across NPPF that effectively require net gain approaches to a range of policies. For each of these, we briefly comment here on the Bradford draft Plan's compliance.
- 7.2 NPPF Para 32 seeks simultaneous progress against economic, social and environmental objectives. Para 3.5.9 of the draft Plan identifies "*issues in the provision of sites to support the development of high growth sectors and low carbon economy oriented businesses*". Considering that West Yorkshire has committed to a target of net-zero carbon by the end of this plan period in 2038 it is self-evident that *all* growth sectors and *all* transformations in the economy must by default be demonstrably low or zero carbon in outcome. Without this, then there is likely to be short-term economic progress at the expense of medium-term social and environmental objectives, and it is also likely that the economy will suffer in the medium term due to increased exposure to climate-related risks. We would therefore expect the priority business sectors in section three of the policy would each to be supported explicitly by a net zero 2038 Action Plan investment plan; and that SP6(B), in identifying sites and locations for employment would also make clear that economic development proposals will be supported where they deliver measurable progress toward zero carbon economy.
- 7.3 NPPF Para 91(c) describes approach to healthy lifestyles by identifying needs and improving provision of amenities. The draft Plan is potentially strong here thanks to policies SP7, SP10 and SP15, but implementation of these policies is highly dependent on the location and the development expectations of the proposed site allocations, about which we have significant concerns.
- 7.4 NPPF Para 97 (d) requires that open spaces losses should be replaced by 'equivalent or better' provision. This is covered by policy CO1.

- 7.5 NPPF Para 102(d) requires a net gain approach to the environmental impacts of traffic and transport infrastructure. Whilst we are generally supportive of the draft Plan's approach to transport, we do have some concerns. The otherwise excellent Policy TR2 opens with the requirement that "*Growth in transport must not come at disproportionate expense to the built, natural and historic environments*", which is in fact a clear acceptance that some environmental cost is permissible. That is not the same as a net gain approach and therefore not compatible with NPPF 102(d).
- 7.6 We are greatly concerned that the South-East Bradford Access Road (SEBAR), which would very likely exact the single largest traffic-related environmental impact, would inevitably generate large amounts of additional traffic, and therefore run directly counter to most of the other objectives of the Plan, is conspicuously missing from the Plan's proposals despite being referred to in para 5.3.26. It is not possible to assess the plan-wide environmental impacts of traffic and transport infrastructure without factoring this road, and a critical reasonable alternative is to plan for a future in which this scheme does not go ahead.
- 7.7 NPPF Para 110(a) requires development to "give priority first to pedestrian and cycle" movements both within a scheme and with neighbouring areas, meaning that a net improvement to walking and cycling in a neighbourhood should be a reasonable expected outcome of a development. Broadly the Plan deals with this well, with the striking exception of apparently permitting lower densities on many site allocations than are needed to deliver walkable neighbourhoods. We also note that the clear hierarchy of car parking expectations set out in para 4.10.2 of the Plan does not read across into policy TR5, when in fact this hierarchy needs to be clearly implementable. Further, policy HO1(d) merely requires that "*urban housing schemes in sustainable locations should not exceed the council's maximum car parking standards...*" and inevitably this is the development management criteria that will prevail in most planning applications.
- 7.8 NPPF Para 118(a) identifies the potential for land to fulfil multiple uses at the same time (multi-functionality). A significant number of development allocations overlap with the green infrastructure network. Whilst this is recognized as a constraint in the site allocation assessments, it is not currently possible to discern what the net effect for the GI network of the development of these sites will be. We would support the inclusion of a Green Infrastructure Standards policy (EN1).
- 7.9 NPPF Para 141 requires local authorities to plan positively for the beneficial use of their Green Belt. Coverage of this in the draft Plan is very disappointing. Para 3.5.28 simply excuses harm to the Green Belt on the basis that the reduction in area is of a "*very limited overall quantum*" and then says that planning positively for the Green Belt "*may require a wider co-ordinated approach*". In other words, there is no strategy for enhancing the beneficial use of the Green belt.
- 7.10 NPPF Paras 157 and 160 demand a net improvement to flood risk as a result of new development. Policy EN7 does not achieve this. It manages the flood risks to new development, and part A4 of the policy

requires new development not to increase flood risk elsewhere, but there is no policy expectation in the Plan for new development to produce a net reduction in flood risk.

- 7.11 NPPF Paras 170(d) and 174 identify the role of ecological networks and require biodiversity net gain. There is currently an apparent internal contradiction within policy EN2. This requires a biodiversity net gain approach at the development management stage (parts H to N of the policy), but each of the provisions in parts C, D, F and G of the policy allow for a degree of harm to species and habitats; and there is no clear way to ensure that the cumulative impact of this policy will be a net benefit to biodiversity and geodiversity.
- 7.12 NPPF Para 171 demands the “enhancement of natural capital at catchment or landscape scale across authority boundaries”. There is no evidence of this cross-boundary approach having been pursued in the relevant policies.

8. Conclusion

- 8.1 Many of the concerns we have raised here could be addressed together, by way of a significant rewording of Policy SP4 – Location of Development. The full explanation for this is provided in our detailed analysis of SP4. We provide our suggested alternative text below:

Policy SP4: Location of Development

- A. The Local Plan will adopt a car-free accessibility approach to ensure that new development contributes to the strategic target of reducing car use over the plan period. It will do this by locating new development such that it:**
- 1. Makes walking, cycling and public transport the most attractive and useful travel modes for day-to-day journeys, to achieve 15-minute neighbourhoods;**
 - 2. Ensures that the pattern of development improves accessibility and independence for all sectors of society;**
 - 3. Takes every possible opportunity to create and enhance green corridors for nature, climate response and active travel;**
 - 4. Minimises the dependence of development on any additional road capacity that could otherwise induce additional traffic;**
 - 5. Maximises the use of rail and water for uses generating large freight movements.**
- B. Having identified how to maximize car-free accessibility, the Local Plan will then maximize the efficient use of land, by allocating sites that:**

1. are compatible with the settlement hierarchy;
 2. give first priority to the re-use of brownfield and under-utilised land within settlements, and second priority to greenfield sites within settlements, while ensuring that development of those does not harm environmental assets or public space;
 3. are suitable for development at a minimum of 50 dwellings per hectare net.
- C. Where there are insufficient sites within settlements, land will be identified for release from the Green Belt adjacent to settlement boundaries, as set out in policy SP5, so long as those sites fulfil the three criteria in SP4 A and B above.