

Bradford Local Plan Review

CPRE West Yorkshire April 2021



The countryside charity
West Yorkshire

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Introduction

The Bradford Local Plan has been a long time coming. We took part in influencing the Core Strategy which was adopted in 2016. The process has been stop/start since then and this is a whole new [draft Local Plan](#).

The early stages of a Plan are some of the most important in terms of community influence. This is a Preferred Options consultation (technical title [Regulation 18](#)), which means there is still room to suggest alternative options for what the overall strategy should be. Later on in the process, there is much less room for manoeuvre as the options become more fixed.

So what has changed since 2016?

Firstly, the overall housing target is lower, at 1,700 per year, although the government has introduced a 35% uplift for large urban centres. Bradford Council is keen that the additional homes should go into Bradford city itself, rather than being added on to the general housing target for the district. We support this position.

Secondly, Bradford has declared a Climate Emergency, and West Yorkshire has published the [West Yorkshire Emissions Reductions Pathways](#) report. By 2038 (the end of the period for this new Local Plan), Bradford should be at net zero carbon. They need some huge transformations to achieve this. Some of the major infrastructure plans for West Yorkshire (such as the [West Yorkshire Mass Transit System](#)) won't have a big impact on emissions until after 2038, so Bradford has a lot of work to do to tackle emissions through other means before then.

Thirdly, the updated [National Planning Policy Framework](#) (NPPF) takes a much stronger line on 'making effective use of land'. This means ensuring that available, suitable brownfield land is being prioritised, and that development densities are being increased. That should result in less land being needed overall, less pressure to release land from the Green Belt, and also more compact, walkable neighbourhoods.

What's CPRE's position?

We want to see pressure on greenfield and Green Belt sites minimised, and to ensure green spaces within urban areas are protected. Sometimes there's a tension between these two goals, but if new development is built at the right density in the right places, it should be possible to get the balance right.

CPRE has identified that the Draft Plan does not properly consider reasonable alternatives to the policies proposed. 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. We have proposed some reasonable alternatives which address issues of climate, housing density and inequality.

In developing our response, we worked with our network of friends and associates in the Bradford area.

Andrew Wood
Planning Consultant

Strategic Policy Review

Sustainable Development & Spatial Priorities

Our response to the draft plan is shaped by our fundamental principles for a good Spatial Plan, that it makes a positive contribution to climate action, and that conforms with NPPF para 148 in shaping places to radically reduce greenhouse gas emissions position.

The overall strategic outcomes of any local plan should be net reductions in greenhouse gas emissions, car traffic, pollution and flood risk, a net enhancement of biodiversity and a net increase in access to green space. The benefits of these outcomes need be socially and spatially equitable.

Local plans also need to have an implementable vision for their rural areas, and CPRE look to the plan to set policies that will actively enhance the countryside in terms of nature, landscape sustainability and people's ability to access and use the countryside in a sustainable way.

Delivering Sustainable Development (Policy SP1)

We consider that SP1B needs to be much more clear and specific about the need to achieve high-level, net enhancements to social, environmental and economic well-being. The NPPF in fact describes a [net gain approach to many areas of the local plan](#).

The Plan should adopt this net gain approach at the top level, by expressing these clearly at the beginning of the plan in this policy.

Spatial Priorities (Policy SP2)

The Plan itself does not present any reasonable alternatives for a spatial strategy. The only alternatives presented are whether the policies should be more or less comprehensive and more or less specific in their scope, but there is no consideration of an alternative strategy. We do not think that it is necessary for the airport to be a spatial priority, which would enable the other objectives of the plan to be better implemented.

In relation to housing growth, the plan proposes 72% of growth within the regional city of Bradford, but the proportion of new development being directed to brownfield sites remains at 50%. It would be reasonable to expect the percentage of development on brownfield land to have increased, and it is unclear why this is not the case. The new growth in the plan period would be more effectively achieved with a greater focus on brownfield sites.

An alternative strategy of pursuing a significantly higher concentration of development onto brownfield sites has not been fully tested.

The Settlement Hierarchy & Location of Development

Hierarchy of Settlements (Policy SP3)

The text describing each tier of settlement is broadly similar, but where there are differences, it is not clear why these exist. Each level of the hierarchy should through the allocation and development of land and buildings should seek to enhance the following considerations:

- the capacity of the settlement to accommodate development;
- the character of the place and neighbourhoods within it;
- high standards of design of buildings and the public realm;
- connectivity and maximising opportunities for take-up of sustainable and active travel modes; enhancing the quantity and quality of green infrastructure;
- and enhancing the vitality of the place as a whole, and neighbourhoods within it.

There is also a lack of a vision for the future of Bradford's rural areas.

Location of Development (Policy SP4)

We strongly support elements of this policy which point to 15 minute neighbourhoods and an aspiration to reduce car dependency and use. These aspirations are of fundamental importance, not only to achieving greenhouse gas reductions and improving quality, but also to tackling the wide range of public health and social inequality impacts of dependence on cars for transport, and dominance of cars in the places and spaces where people live and work.

We would encourage the use of the 15 minute neighbourhood model to be adopted as a policy in the plan for all but the smallest and the most remote settlements. Communities such as Addingham or Oxenhope should not be more dependent on cars and less able to access their basic needs on foot than people living in urban neighbourhoods of the city of Bradford.

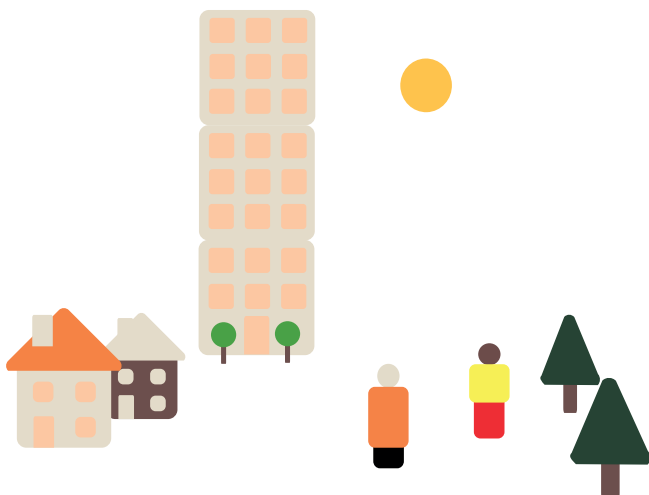
The West Yorkshire emissions reductions pathways report states that a 21% reduction in car mileage is needed by 2038, which is also the end of this plan period. If this is to be achieved, it is essential that the Local Plan does everything it possibly can to facilitate it. New development must be located and planned in such a way as to facilitate net reduction in car use in the host settlement. This is likely to depend on significantly greater concentration of new development within areas that are capable of being 15 minute neighbourhoods, and significantly more mixed-use rather than single-use site allocations.

A comprehensive approach is also needed to ensuring that non-car modes are safe, attractive and reliable choices for an increasing majority of journeys and for all users.

The extension of Permitted Development rights could seriously compromise the ability of mixed use sites to remain in mixed use. We think that changes of use that undermine the 15 minute neighbourhoods concept would constitute an overwhelmingly negative impact, and provides justification for use of [Article 4 directions](#) (a piece of legislation that allows a local planning authority to restrict permitted development within a planning permission) to protect neighbourhood vitality.

The language used in policy SP4 is too subjective. We want to see stronger potential to improve biodiversity. Biodiversity and environmental potential of previously developed land should be considered in an integrated way with its development potential. We also expect more specific requirements for examining the sustainability of greenfield sites within settlements.

We have suggested a major re-wording of SP4:



Alternative Wording for 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.

The Green Belt (Policy SP5)

We support the position taken by Bradford that the governments intended 35% uplift in housing for large urban areas should be targeted at urban centres and regeneration, rather than the general housing supply. This must mean that the council anticipates meeting this need from sites in urban centre areas. According to SP4, this urban land would be prioritised for development, and therefore the proposed scale of Green Belt change is unclear.

Paragraph 3.5.6 of policy SP5 states that the assessment of non-Green Belt land capacity takes into consideration density levels compliant with policy HO2. Our own analysis of proposed Green Belt sites indicates net densities averaging around 26 dpha – well below the HO2 minimum of 35 dpha, and even further below the 50 dpha that we consider all site allocations should be required to achieve. There is no sound rationale for releasing Green Belt land if the result will be 5,000 homes developed at non-policy compliant densities.

As highlighted on pages 9 – 12, CPRE do not accept that the housing density requirements set out in HO2 correspond with the site capacity assessments for the sites in the plan. Also, we do not accept that the economic growth proposals set out in policy SP6 robustly justify the allocation of Green Belt sites for employment, and therefore do not consider the exceptional circumstances have been adequately demonstrated for Green Belt change to supply employment land.

If the local plan is to demonstrate exceptional circumstances for Green Belt change. This must be set in the context of:

- the need to address climate action as we described in response to SP1;
- the need to achieve significant environmental net gains through development as required by NPPF, and the scale of car traffic reduction needed.

The net effect of releasing land from the Green Belt for the housing and employment sites proposed will undermine achievements of policies SP7 and SP9, resulting in failure to meet West Yorkshire's net-zero 2038 target.

There are no credible alternatives explored in the plan. The 'alternatives' describe a different approach to how the policy is laid out, in particular by excluding sites from the policy listing, but no alternative approach is offered either for increasing the proportion of new development directed towards urban brownfield sites; or for further increases in residential and employment density as a way to reduce the amount of Green Belt land required.

We do not accept that the strategic case for exceptional circumstances to allocate land from the Green Belt has been properly justified, and have therefore objected to all the proposed site allocations listed in the policy.

Alternative Wording for Policy SP5: Green Belt

It is essential that the net effect of releasing land from the Green Belt is a measurable net benefit to the function of the Green Belt. We suggested a rewording of SP5 along the following lines:

Where land is released from the Green Belt for development the Council will identify compensatory improvements to the environment quality and accessibility of remaining Green Belt that produce a measurable net improvement to the beneficial use of the Green Belt in the same locality as the Green Belts release. This may include inclusion of additional land in the Green Belt in those localities, and/or Local Green Space Designations to protect green spaces within settlements.

Economic Growth (Policy SP6)

Although some of the Bradford Local Plan is positive, other aspects are very disappointing. The supporting text for this policy is very opaque and it is difficult to discern from it what the plan's economic rationale actually is. A Local Plan should actively support those economic developments which contribute to the implementation of the spatial and sustainability objectives of the Plan.

This policy does not provide any guidance about what the local plan intends to do to support the economy. The regional city of Bradford is identified for enterprise in the green economy, where other parts of the settlement hierarchy are not. It is not clear how this has been determined. There are no details about the specific needs for different business sectors and how these will be supported. The policy states the councils intention to support the delivery of at least 1,600 jobs a year but does not specify the degree to which the Local Plan policies and site allocations are anticipated to contribute to that level of job creation. It is entirely unclear how employment land allocation and job targets have been related.

It is proposed that a substantial portion of the 72ha of new employment allocations are come from the Green Belt. The justification given for exceptional circumstances for Green Belt change does do not stack up, for the reasons set out here.

Para 3.5.9 identifies issues in the provision of sites to support the development of high growth sectors and low carbon economy oriented businesses.



As West Yorkshire has committed to a target of net-zero carbon by the end of this plan period in 2038, all growth sectors supported by the plan must by default be demonstrably low or zero carbon in outcome. We would therefore expect the priority business sectors in SP6(A3) to each be supported explicitly by a net-zero 2038 action plan; and SP6B, 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.

3.5.11 says that the locational demand for employment space for businesses already operating within the district tends to be very locally specific in order to retain staff and local trading relations. And 3.5.10 states that the vast majority of non-Green Belt allocations are in micro, small, and small-to-medium sized allocations. This indicates that the larger Green Belt sites that are proposed to be allocated will not deal at all with the locational demands of businesses already operating within the area because those sites may not be local enough for the retention of staff and local trading relations; so the larger sites are geared to providing for incoming, larger businesses. In line with our comment about 3.5.9, it is imperative that incoming businesses are expressly zero-carbon – otherwise the transformation of economic activity and the associated spatial patterns will be directly undermined.

To address these issues SP6 must make a clear and unequivocal statement that plan-supported economic development must actively contribute to the net-zero 2038 target for West Yorkshire.

There is no alternative strategy presented as having been considered. There is no evidence that the plan has considered whether Bradford's economic strategy is compatible with the spatial and sustainable development priorities of the plan.

The local plan should recognise that employment within market sectors is only one component of the economy. The other key components are the foundational economy which includes the public sector, health care, education and other services, and the many micro businesses for whom growth is not a priority, but who provide large numbers of jobs.

Retrofitting existing buildings with zero carbon for example, may offer employment opportunities within many small and medium-sized businesses, and would be hugely beneficial to the district in pursuing its net-zero carbon target. An innovative policy for the development expectations of residential and business land and buildings would also provide a major employment opportunity and a major carbon reduction opportunity. That is the kind of economic policy we need to see in the Plan.

Sustainable Transport (Policy SP7)

We warmly welcome and support many aspects of this policy, which is truly forward-looking in its intent for a 21st century, sustainable pattern of transport.

It is very encouraging to see a local plan policy taking a robust and ambitious approach to demand reduction through the location of development, and to transforming travel choices and patterns through reallocation of road space and re-engineering of streets.

The plan's role in supporting rail and mass transit improvements is unclear. It is also unclear to what extent the the locational sustainability of the plan's spatial strategy is reliant on rail and mass transit improvements which may or may not be forthcoming within the plan period.

Bradford needs to achieve net-zero carbon by the end of the plan period so any measures that are to contribute to carbon reduction must take effect during the plan period. If they will not take effect until towards the end of or beyond the planned period, then they are legitimate measures to ensure that development post 2038 is zero carbon; but development that takes place before 2038 must measurably contribute to zero carbon in the absence of these measures. This needs to be clarified.

The supporting text for this chapter is much clearer than the policy itself in explaining what the plan aims to achieve and how to implement it, and should form part of the policy.

Housing Growth (Policy SP8)

CPRE believes in meeting genuine housing need by building the right types of homes in the right places. We are content with the proposed numerical housing requirement. We support the council's proposed approach to dealing with the 35% uplift for urban centres.

The components of supply identified in this policy effectively describe a sequential approach to supply and the two broad locations for growth. We infer from this that land for the broad locations would be removed from the Green Belt but not allocated. It is difficult to compare this information and the information on the policies map with the list of Green Belt release sites identified in policy SP5, considering that a significant proportion have the total housing supply identified to come from Green Belt is located within the broad locations for growth. It is also unclear whether those broad locations for growth are intended to supply further housing numbers beyond the plan period.

The four Principles of Sustainable Transport set out in SP7 are very important and we give them our full support:

1. Demand Reduction
2. Mode Shift/structural change
3. Efficiency/consolidation
4. Technological/Electric

We cannot see from the draft Plan the proposed what the extent of land-take in the broad locations for growth within and beyond the plan period is likely to be.

It would be helpful to know which of the settlements in Schedule 1 have prepared or are preparing neighbourhood plans. SP8F implies that neighbourhood plans could provide for additional housing numbers above and beyond those in Schedule 1, but it appears that the distribution in Schedule 1 has been derived from the availability of known sites and their indicative capacity.

In many cases we know that communities are objecting not to the numerical target itself but to specific site allocations.

Therefore it is important that SP8F is worded to empower neighbourhood plans to specify the type and density of housing, such that meeting or exceeding the numerical target but on fewer sites, or on more smaller sites, is an acceptable role for the neighbourhood plan.

The breakdown of previously developed previously developed land allocations in SP8H tells us that:

- In the Regional City, 45% of dwellings will be greenfield, ie 9,033
- In the Principle Towns, 65% of dwellings will be greenfield, ie 2,177
- In the Local Growth Centres, 85% of dwellings will be greenfield, ie 2,434
- In Local Services Centres, 70% of dwellings will be greenfield ie 963

Consequently, 14,607 new dwellings will be on greenfield land across the district, which is 48% of the total requirement but 53% of allocations, by number of dwellings. Due to the tightly-drawn Green Belt a high proportion of the greenfield allocations will come from the Green Belt.

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.

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.

However, if in fact all of the greenfield sites averaged the general minimum density of 35 dpha net, which equates to 28dpha gross, then the same 14,607 homes would require 522 ha of land.

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 29dpha. If this pattern were to prevail across all greenfield sites, in the plan, then 14,607 homes would require 635 ha.

Consequently, if the brownfield sites achieve 50dpha, but the greenfield sites are developed at the densities which appear to be prevailing in the allocations, then by land area the Plan may only be achieving 37% of housing on brownfield land.

The Plan is not making the most effective use of land, and is not in conformity with NPPF para 137. The Green Belt land-take may be almost double what it would need to be if density expectations were properly applied.

Even if the district-wide brownfield rate remained at 50%, the proposed greenfield land take in the Plan is approaching double what is needed if all greenfield development were built to the policy-compliant 50dpha 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.

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.

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.

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.

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. Calculating land requirements by area in this way is an important, reasonable alternative to the approach currently taken by policy SP8.

Climate Change (Policy SP9)

CPRE warmly welcomes and supports this policy on Climate Change & Environmental Sustainability as a bold and clear policy for climate action. We especially welcome the inclusion of the high-level target of net-zero 2038 within the policy, which shows Bradford taking a lead where some local authorities are still lagging behind.

We fully support and welcome the Green Infrastructure policy (SP10) and SP11 which aims to protect the South Pennine Moors SPA / SAC and their zone of influence.

We also support policy SP14 - which looks at Making Great Places and (SP15) Creating Healthy Places subject to our objections to policies SP6 and SP8 being addressed.

Minerals (Policy SP12)

We have not had the capacity to analyse the policy for minerals and will reserve comment; other than to emphasise that minerals policy must be compatible with the Council's climate targets; and we recommend that this should be incorporated into this policy along the following lines:

Seek to ensure that the provision of new minerals development (including hydrocarbons) meets key environmental criteria, protects human and natural resources, and is compatible with the aim of achieving net-zero greenhouse gas emissions by 2038.

Alternative Wording for Policy SP9(A3)

We recommend making clear that achieving the headline target is dependent on all developments making a net contribution to carbon emissions reduction. Suggested wording:

Development proposals will be supported where they can demonstrate that their total net impact will be to reduce the greenhouse gas emissions arising from the combination of their construction, use and associated transportation of people and goods. They will be required to incorporate mitigation and adaptation measures to address the impacts of climate change, appropriate to their scale, use and location.

Alternative Wording for Policy SP9(B1)

Amended to take account of the need for increased development densities to reduce road traffic and increase use of walking and cycling. Suggested wording:

*Following the settlement hierarchy and be:
Located in areas which are close to services and facilities and are accessible by public transport;*

- *Developed at sufficient density to support local amenities and make walking, cycling and public transport viable and attractive travel choices for the majority of journeys;*
- *Designed to prioritise and enhance sustainable transport choices within the development and connecting to it from adjacent neighbourhoods.*

‘Hotspots’

As we have explored in our policy review, we do not accept that it is correct to develop any land in an unsustainable way. Many of the site allocations in the proposed plan are for housing at gross densities well below the HO2 minimum of 35 dpha, and even further below the 50 dpha that we consider all site allocations should be required to achieve. There is no sound rationale for releasing Green Belt land if the result will be 5,000 homes developed at non-policy compliant densities.

Area	Site	Details
Wrose, Thackley and Idle	NE19/H	
Holme Wood	SE37/E SE47/H SE46/H SE45/H SE31/H SE18/H SE13/H	All hotspots gross density around 26
Great and Little Horton	SW8/H	
Clayton and Clayton Heights	SW5/H SW6/H SW10/H SW18/H SW22/H SW33/H	SW33/H appears to be proposed for extremely low development density, which is unsustainable and not compatible with the strategy. Sites that are not suitable for policy-compliant densities should not be allocated, irrespective of whether they are brownfield, greenfield or Green Belt.
Allerton	NW7/H NW8/H NW9/H NW10/H	

Area	Site	Details
Heaton	NW13/H NW19/H	NW19/H - 14.76 gross density Given its parkland setting a high quality a relatively low density scheme is required Gross density is 14.76 There are no wildlife designations within the site but parts of the site are identified as priority habitats and most of the site lies within a bat alert layer. Considering the recognition of the site's parkland setting, in our view the site is unsuitable for development at sufficient density to constitute sustainable development, and it should not therefore be allocated.
Shipley	SH4/H SH5/H SH6/H	Gross density of these sites are 26/31
Baildon	BA5/H BA2/H BA6/H	BA5/H - Gross density 18.52
Bingley	BI3/H BI4/H BI8/H	

Area	Site	Details
Cottingley	CO1/H	At 18.34 the gross density for site CO1/H is not policy compliant and would not constitute sustainable development.
East Morton	EM1/H	
Keighley	KY15/H KY2/H KY35/H KY36/H KY40/H KY7/H	
Silsden	SI2/H SI3/H SI4/H SI5/H	
Steeton with Eastburn	ST1/H ST4/H	ST1/H - Gross density 22.47
Addingham	AD1/H AD3/H AD6/H AD7/H	AD1/H, AD3/H, AD6/H - Gross density between 10 and 35 AD7/H - Gross density 16dpha
Burley - in - Wharfedale	BU1/H BU2/H	BU1/H - Gross density 26.59
Ilkley	IL1/H IL2/H IL3/H	IL1/H - Gross density 18.11 IL2/H - Gross density 16.95 IL3/H - Gross density 20.92

Area	Site	Details
Menston	ME1/H	
Cullingworth	CU3/H	
Harden	HR1/H HR3/H	
Oakworth	OA1/H OA2/H	
Oxenhope	OX1/H	
Queensbury	QB7/H QB1/H QB4/H QB5/H QB6/H QB8/H QB9/H	QB7/H - 50.98 gross density. The site is within 400m of a bus stop but with only an hourly service. It is not necessary for all of these sites to be allocated in order to meet the settlements development needs.
Thornton	TH3/H TH9/H TH11/H	

Specific Site Allocation Reviews

Holme Wood

Concerns have been brought to our attention by local groups in South East Bradford. In addition to the strategic level, we have identified the following sites which we believe to have an impact on the local area:

SE37/E, SE47/H, SE46/H

In addition to our wider strategic objection to the Plan's proposed Green Belt allocations, we also have grave concerns in SE Bradford about what the Green Belt deletion would enable.

We understand that the council may wish to bring development to the area to address deprivation, we do not accept that development of these allocations will bring the targeted benefits that are needed, and will instead have net negative impacts. By removing Green Belt land at Holme Wood, the amount of accessible green space to residents is reduced.

It is also entirely unclear how the development of these sites is, or is not, co-dependent with the SE Bradford Access Road, which is referred to in the Plan but not indicated on the proposals map and not mentioned in the transport policies. The air quality, noise and severance associated with the new road would have a disproportionate negative impact on the access to and enjoyment of green space for those deprived neighbourhoods.

Consequently in our opinion these allocations will not only have an impact on the function of the Green Belt, but the Green Belt deletions will enable unsustainable outcomes.

Burley-in-Wharfedale

BU1/H - gross density 26.59

The site now has permission following the Secretary of State's recent decision. In line with our strategic comments, development at low density will negate the claimed sustainability benefits of building in an accessible location.

Baildon

BA5/H - gross density 18.52

This site has been brought to our attention based on the concerns from local groups. In addition to our comments on SP5, we would object to this site allocation. The site BA5/H has been identified to be highly accessible to services and within sustainable transport modes, specifically Baildon train station at 800m walk away. However, the site is located adjacent to a TPO tree and an area of TPO woodland. Removing this part of the green belt which has a large potential for landscape impact, is of concern, and developing low density housing on it would be a very unsustainable outcome for the site.

Ilkley

Concerns about these sites have been brought to our attention by local groups in Ilkley. In addition to the strategic level, we have identified the following sites which we believe to have an impact on the local area:

IL1/H, IL2/H, IL3/H

As stated in our objection comments on policy SP5, proposed development within the Green Belt across the district shows a net density averaging around 26 dpha, well below the HO2 minimum of 35 dpha. These sites identified in Ilkley are lower still, with gross densities of 18.11, 16.95 and 20.92.

We also note that IL4/H, while not in the Green Belt, is also the subject of significant local concerns especially about flood risk. We would suggest that the development needs of Ilkley need to be re-examined from the perspective of producing more compact development at significantly increased density, thereby improving walkability, having much-reduced land-take and allowing for real enhancements to green infrastructure and flood management.

Shipley

The sites proposed for Shipley, like many other sites across the district, are proposed to be built within green belt land and at a density of around 26dpha, a figure much lower than the HO2 minimum of 35 dpha, and even more inconsistent with our position set out in policies SP4, SP5 and SP8. Moreover, site SH4/H is proposed for land which is expected to be within a Proposed Clean Air Zone. Whilst this site allocation mentions there are potential for some positive effects for the area, such as improvement to the local economy, there are some concerns.

Sites SH5/H and SH6/H are also proposed to be, at least in part, within the Proposed Clean Air Zone and both have elements of woodland along their boundary. There is the risk of flooding at these sites too as sections of the land is within flood Zone 2. As the last buffer of land between Cottingley and Shipley, it is important to maintain this open landscape.

Development on this land would result in the removal of a significant amount of woodland, which would be a major harmful impact.

Addingham

Concerns about these sites have been brought to our attention by local groups in Addingham. In addition to the strategic level, we have noted these specific concerns which point to unsustainable outcomes from these allocations:

- AD1/H - distance of the site from the village centre which is a deterrent to walking or cycling
- AD3/H - not located near public transport
- AD6/H - Only part of site within 400m of a bus stop with two services every hour; distance from the village centre will be a deterrent for walking and cycling

Silsden

We support the position of Silsden Campaign for the Countryside, that the land at the southern point of Silsden, as well as the northern point towards the north and east of SI2/H, should be returned to the Green Belt.

Through reviewing the density of these proposed site allocations, we do not accept that the extent of proposed greenfield allocation is necessary to accommodate the proposed amount of development. Similar to other areas of the district, the level of density proposed in Silsden is much lower than we would expect; this is also true of the brownfield site SI5/H. We suggest that the density should be increased and the size of allocation reduced accordingly.

Site	Site Name	No. of Dwellings	Gross ha.	Gross Density
SI2/H	Bolton Road	40	2.1	19.05
SI3/H	Woodside Road	146	5.56	26.26
SI4/H	Sykes Lane	145	5.52	26.27
SI5/H	Keighley Road	156	4.51	34.59

Steeton with Eastburn

ST1/H - gross density 22.47

This site has been brought to our attention based on the concerns from local groups. In addition to our comments on SP5, we would object to this site allocation. The gross density of the dwellings at ST1/H is much lower than we advocate, and is likely to achieve well below the HO2 minimum of 35 dpha net. As stated in the council's report, 19% of the site is in 3b flood zones which causes concern for proposed development on this land.

Our 'Reasonable Alternative' Vision for Bradford

A really important part of the Preferred Options (Regulation 18) stage of consultation is that the Plan needs to show how it has considered and assessed 'reasonable alternatives' to the policies it proposes. We do not feel that this plan has adequately proposed other alternatives. We feel there is a better alternative to the suggested proposals which grapples with the issues of climate, densities and inequalities.

[Bradford Local Plan Preferred Options: A Strategic-Level 'Reasonable Alternative'](#) (March 2021) forms our manifesto for the Bradford Local Plan, which will guide our responses during the future stages of the Local Plan Process.

Many of the concerns we have could be addressed together if Policy SP4 (Location of Development) was reworded. The full explanation for this is provided in our [detailed analysis of SP4](#). This would provide a reasonable alternative for the Bradford Local Plan that considers climate, densities and inequalities - the primary challenges for our generation.



Headline Issues

If the Council considers that it can 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.

West Yorkshire has a political commitment to net-zero carbon by 2038, which is the end of this plan period. 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.

Leeds/Bradford Airport

Due to the climate target, it is self-evident that all plan-supported economic development over the plan period must be low or zero-carbon. Growth related to the Airport is anomalous, and support needs to be specifically targeted at helping priority sectors to decarbonize.

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 is a better alternative.

South East Bradford Access Road

The South East Bradford Access Road is at odds with the Plan's climate targets and objectives to reduce road traffic. It 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 not in the Plan's proposals, despite references to its relationship to the Holme Wood [\[add link\]](#) broad location for growth. The reasonable alternative is to plan on the basis that this road should not, and definitively will not, be built.

Housing Densities

To fulfil policy SP7(1c), all allocated sites in the Regional City, Principal Towns or Local Growth Centres must be capable of and suitable for development at a minimum density of 50dpha.

Our 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 (NPPF para 137) have been met, to justify Green Belt release.

Environmental Net-Gains: over the page

10 ways to use the NPPF to Ensure Environmental Net-Gain in the Bradford Local Plan

Several aspects of environmental net gain that are required by NPPF are 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.

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.

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”.

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.

NPPF Para 91(c) describes an 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.

NPPF Para 97 (d) requires that open spaces losses should be replaced by ‘equivalent or better’ provision. This is covered by policy CO1.

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).

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).

The South-East Bradford Access Road (SEBAR), 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.

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.

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.

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.

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.

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.



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