

Local Development Framework for Bradford

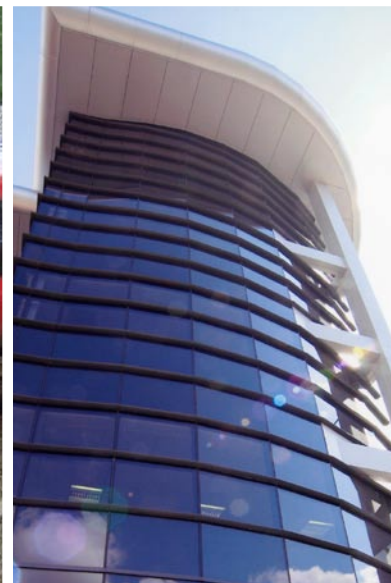
Core Strategy

Issues and Options

Summary of Representations

Topic Paper 5: Transport

December 2007



City of Bradford MDC

www.bradford.gov.uk

LIST OF CONSULTEES WHO SUBMITTED COMMENTS ON TOPIC PAPER 5

1. Baildon Community Council
2. C. V. Barton
1. Bradford Centre Regeneration
4. Bradford Chamber
2. Bradford and Airedale Teaching Primary Care Trust
6. Burley Community Council
7. English Heritage
8. Environmental Partnership
9. Government Office for Yorkshire and Humber
10. Highways Agency
11. J. Hill
12. Ilkley Civic Society
13. Ilkley Parish Council
14. Metro
15. Miller Strategic Land (submitted by Erinaceous Planning)
16. Natural England
17. Royal Mail Group Property
18. Royal Society for the Protection of Birds
19. Sport England
20. Transport 2000 – West Yorkshire
21. Wharfedale Friends of the Earth
22. Yorkshire Forward
23. Yorkshire and Humber Assembly

COMMENT	ORGANISATION
GENERAL	
<p>The greatest priority for the LDF transport policies must be to support economic and regeneration activity in the Bradford, notably in the four economic hubs and above all in the City Centre. This has been treated almost as an afterthought at the very end of the Topic Paper. It should be re-positioned and given greater weight at the beginning of the paper. This will indicate the serious nature of the transport debate for the District in dealings with Regional Spatial Strategy and the West Yorkshire Transport Plan. Bradford has for too long been inadequately represented in the regional transport debate, a situation perpetuated by the paper.</p> <p>With the District forecast to be the fastest-growing economy in Yorkshire, its connectivity in terms of road and public transport must be given greater prominence.</p>	Bradford Centre Regeneration
<p>There may be fast rail contact between Wharfedale and the metropolises, but it is already overloaded and the car parking around the stations at both Burley and Menston, originally sufficient, is now far too small. Buses to Ilkley and Otley are fine, but any longer journey, even to Bradford, is now barely viable.</p>	Burley Community Council
<p>As you will be aware the main concern of the Agency is to ensure the safe operation of the Strategic Road Network (SRN). Within the Bradford district the Agency's concerns at present relate to the A650, M606 and M62, and so any development proposals which could affect the safe operation of these corridors would cause concern.</p>	Highways Agency
<p>Access to efficient public transport reduces reliance on private car usage, thus reducing the environmental impacts of car travel. It also promotes the health benefits of increased physical activity, whether by use of active travel or by walking to and from public transport access points. Furthermore good transport links are essential for the population to access health services and when planning new services, whilst poor access to public transport contributes to health inequalities</p>	Bradford and Airedale Teaching PCT
<p>Bradford Chamber supports the locational principle and settlement hierarchy of the Core Strategy, whereby new developments should take place within existing built-up areas, with focus on Bradford city, Airedale, Wharfedale and the urban fringe.</p>	Bradford Chamber
<p>Para 2.7 – PPG3, para 62 has been superseded by PPS3 (see paras 45-51)</p>	Government Office for Yorkshire and Humber

<p>Options generally – There will be a need to make sure that the options, identified under the five priority areas, to be taken forward at Preferred Options stage are mutually compatible, for example improving highway capacity (which is likely to lead to increased car use) versus public transport investment and improvement.</p> <p>As work on the DPD progresses it will need to set out options for strategic planning of transport for the district and their spatial implications and relationship with the rest of the Core Strategy. It will also where possible, through the settlement strategy, need to provide spatial expression for the LTP.</p>	
<p>The reference to parking standards in PPG3 is out of date. It is not clear how the 6th bullet of the vision in Paper 2 in respect of providing better connections with other parts of the country is translated into options in topic paper 5..</p>	J Hill
<p>Section 2.0 Influences No reference is made to the Future of Transport White Paper and the Eddington Transport Study.</p> <p>Paragraph 2.7, need to refer to PPS3 Housing (not PPG3)</p>	Metro
<p>We are generally supportive of all the options in this section, in particular we would like to see the provision of essential services for local people, provide accessibility of the countryside for visitors by modes other than the car, maximise opportunities for walking, cycling and horse riding within rural areas and urban fringe. Ensure Public Transport dovetails into new developments and relevant infrastructure is provided within developments. Safeguard redundant transport infrastructure e.g rail track beds and canals for re-establishment as transport corridors where this does not conflict with their wildlife value. Identify potential for new and improved multi access recreational routes in the countryside including the se of quiet roads for recreation benefits. Minimise the impact of traffic and transport infrastructure on the rural character when designing road schemes. Safeguard the existing public rights of way networks and identify areas of under-provision. Including allowing for and encouraging expansion of the network</p>	Natural England
<p>It is considered that the poor access to the motorway network is an important issue in considering the suitability and attractiveness of the proposed strategy to future employment uses. Whilst the Topic Paper refers to a decline in traditional industries and a proposed expansions in more office based sectors and particularly ICT, It is considered that the strategy needs to provide for and consider existing businesses within the District that require access to the road network. Indeed we would question sustainability of the proposed strategy which seeks to increase housing in the City Centre but focus the main employment in Airedale, albeit with limited housing growth. It is considered that this approach is contray o national and regional planning guidance which supports the development of housing close to employment areas to help reduce the need to</p>	Royal Mail Property Group

<p>travel.</p> <p>Therefore, whilst my client does not necessarily object to the vision and the proposals for employment development in Airedale, it is considered important that the strategy considered the need for employment developments in a range of locations including the city centre and Airedale. The protection of existing allocations that are locationally suitable and the provision of new allocations should have regard to transport links throughout the District and the wider region through good quality access to the national road network.</p>	
<p>Sport England would support a wider definition of employment to cover jobs in sport, leisure and recreation. This would recognise the true value such activities provide to the local economy, and the wider benefits associated with sport.</p>	<p>Sport England</p>
<p>We note from 3.3 that the number of no car households in Bradford and West Yorkshire is much higher than the national average. This coupled with the very poor public transport in Bradford will ensure that car usage and congestion will increase in the future unless the Council changes transport policy. Currently Bradford Council policies favour highway construction and car use at the expense of other modes of transport. For instance the council is a strong advocate of building new roads, which will generate more traffic.</p>	<p>Transport 2000 – West Yorkshire</p>
<p>Wharfedale Friends of the Earth believe that transport has a significant impact on the quality of life of residents of Bradford District and on the sustainability of the community we live in. We suggest that the following key policies should dictate the overriding principles of the transport elements of the Local Development Framework</p> <p>Hierarchy of transport use</p> <p>The Local Development Framework should consider and provide for the needs of different modes of transport in accordance with the following hierarchy of transport users:</p> <ol style="list-style-type: none"> 1. Pedestrians 2. The mobility-impaired 3. Cyclists 4. Public transport users 5. Powered two-wheelers 6. Commercial users 7. Shoppers and visitors by car 8. Car commuters 	<p>Wharfedale Friends of the Earth</p>

Land use, climate change and transport integration

In order to mitigate the climate change consequences of transport activity and proposals, Bradford District Council should:

- Implement policies which will reduce existing and forecast growth in climate change emissions from existing transport activity by the less sustainable modes (road and air) and
- Undertake and then act on climate change impact appraisals of significant new transport proposals and programmes. Bradford District Council should minimize the resource demands of transport by :
- Integrate land use and transport so as to reduce the need to travel
- Restrict the development of person trip generating uses to locations with good quality public transport
- Restrain inappropriate development alongside motorways and at motorway junctions.

Roads

Road building and widening will be regarded as the option of last resort as a solution to transport problems. Support will not be given to any road-building or widening proposal unless it can be demonstrated that all other possible options, including non-road building options and making more efficient use of existing infrastructure, have been fully considered and it has been concluded that these do not provide an adequate solution. An Economic Impact Report will be required for all proposed road schemes. The LDF will not commit to supporting any specific infrastructure project where this support might prejudice the outcome of a full Environmental Impact Assessment.

Walking

The LDF should recognise the potential for significant modal shift to walking for short journeys and should aim by 2010 to increase substantially the share of journeys under one mile long made on foot. This will be achieved by:

- Providing direct, well-maintained and well-lit walking routes, including to and from schools.
- Providing quality footways in towns and in Bradford city and quiet lanes in the rural areas.
- Slowing down traffic through the use of 20mph speed limits and Home Zones.
- Introduction of car-free areas in major centres.

Cycling

<p>The LDF should recognize the potential for significant modal shift to cycling for short journeys and should aim as a minimum to quadruple the share of journeys made by bike by 2012, in line with the targets of the National Cycling Strategy. This should be achieved by providing a network of cycle friendly streets and cycle routes in urban and rural areas.</p>	
<p>The Assembly overall supports the principles outlined in this document.</p> <p>It is suggested that the Influences section (page 2) needs to respond to the new approach to housing accessibility and car parking as set out in PPS3. It would also be helpful to include after the “Regional” sub-heading a reference to the Leeds City Region Transport Vision as set out in the City Region Development Programme. The City Region Vision work should also be included in the evidence base.</p>	<p>Yorkshire and Humber Assembly</p>
<p>ACCESSIBILITY</p>	
<p>5.1 HOW CAN THE LDF CONTRIBUTE TO THE ENHANCEMENT OF EXISTING ACCESSIBILITY TO JOBS, SERVICES AND FACILITIES?</p>	
<p>Some of the thinking is unrealistic because of the hilly nature of the area gradients in Baildon and the existing traffic make it unlikely that many Baildon residents will travel by bicycle. Consideration could be given to indicating a cycle route to Saltaire via Baildon Green and across the river (by this we do not mean that a cycle lane should be made as the roads are too narrow) and those travelling to Shipley, Bingley and Leeds could use the canal towpath. We are not, however, clear about the legal position regarding cycling on canal towpaths. Unfortunately the dangerous nature of the roads sometimes encourages cyclists to ride on the pavements.</p>	<p>Baildon Community Council</p>
<p>Bradford’s business community would support the following actions: <i>locating housing development closer to jobs and services; creating mixed-use development areas accessible by different transport modes; maximising development at public transport nodes, main centres and existing routes; locating new services on the latter.</i></p> <p>Although we do not oppose improvements to cycle-paths and pedestrian rights, we do not think these should be a priority. With business playing a primary role in economic development and the creation of wealth and jobs, rapid response and movement is often needed by companies to meet pressing deadlines. As such, improvements to road, rail and air remain the key issues for business.</p> <p>Further, Bradford’s topography and district size does not lend itself well towards the promotion of cycling.</p>	<p>Bradford Chamber</p>

<p>There are merits to all the options. The existing approach has value but is not making a difference quickly enough and has the potential to be piecemeal, with provision 'patchy' across the District with few interconnections.</p> <p>Given the varied topography of the District with its urban and rural mix, the other options should all be retained, with different approaches being deployed in different areas and settlements as appropriate. This can be considered in detail as the LDF takes shape and the needs of the different areas worked through. Otherwise there is a risk that taking one option only would widen inequalities; for example, only locating new housing development closer to jobs and key services would disproportionately affect those growing up or growing older in rural communities.</p>	<p>Bradford tPCT</p>
<p>A number of options are put forward for enhancing and securing accessibility to jobs, services and facilities and it is felt that a <u>combination of these options</u> should be used to create a high level of accessibility to jobs and services by a range of modes, and not just the private car.</p> <p>The document identifies that the M606 corridor in particular is an employment area in Bradford which is poorly served by public transport, cycling and walking. With this in mind, any development along the M606 corridor would need to be supported by sustainable transport measures to reduce the impact of the development on this corridor.</p>	<p>Highway Agency</p>
<p>All options, but cycling and footpaths likely to be minimal contribution</p> <ul style="list-style-type: none"> • 1. Continue with existing approach to negotiating improvements to accessibility to all developments for cyclists, pedestrians and public transport • 2. Locate new housing development closer to jobs and key services • 3. Create areas of mixed use development which can be accessed by different modes of transport • 4. Maximise development at public transport nodes • 5. Maximise development in the main centres and along existing transport routes • 6. Create more long distance cycle and footpath networks • 7. Locate new service facilities in the main centres and along public transport routes • 8. Ensure new development is designed to provide more direct, safer routes for cyclists and pedestrians • 9. Restrict new developments attracting higher number of people such as larger employment uses, 	<p>Ilkley Civic Society</p>

<p><i>leisure, education, and larger housing schemes to Bradford City Centre and town centres and other areas of high public transport accessibility</i></p> <ul style="list-style-type: none"> • 10. Ensure proposed development is accessible to all, including disabled people through establishing accessibility criteria in assessing minimum standards of public transport, cycling and walking provision, and inclusive design in new developments • 11. Ensure redevelopments attracting large numbers of people, which are located in areas of low public transport accessibility are accompanied by a Travel Plan. 	
<p>All options (see options listed above)</p>	<p>Ilkley Parish Council</p>
<p>By adopting options 2 to 8 and 11.</p> <ul style="list-style-type: none"> • 2. Locate new housing development closer to jobs and key services • 3. Create areas of mixed use development which can be accessed by different modes of transport • 4. Maximise development at public transport nodes • 5. Maximise development in the main centres and along existing transport routes • 6. Create more long distance cycle and footpath networks • 7. Locate new service facilities in the main centres and along public transport routes • 8. Ensure new development is designed to provide more direct, safer routes for cyclists and pedestrians • 11. Ensure redevelopments attracting large numbers of people, which are located in areas of low public transport accessibility are accompanied by a Travel Plan. <p>I would suggest that limiting larger housing schemes to areas of high public transport accessibility is not too important as the new development could fund and maintain new public transport services. For travel plans to be effective they need to have targets that are enforced by BMDC. I would also like to see BMDC use developer contributions to fund bus services to inaccessible locations, e.g. Euroway (I will also submitted a response to the draft SPD outlining my proposals in more detail).</p>	<p>Metro</p>
<p>It is considered that the most effective means of ensuring that existing jobs, services and facilities are accessible is to focus the majority of new housing and other development within and adjoining the main urban area i.e Bradford. The principle of urban concentration will result in the most sustainable patterns of development and will ensure that existing and future facilities are accessible to a large community.</p> <p>It is noted that the options suggested at paragraph 3.11 of the topic paper are broadly accepted as being appropriate as they support the principle of urban concentration.</p>	<p>Miller Strategic Land</p>

<p>We support the eleven options developed. We agree that new developments should be designed to provide safer access for cyclists and pedestrians: developers should be expected to contribute to the creation of green walkways and cycle ways to ensure these routes are safe and attractive and are also used by residents for recreation</p>	RSPB
<p>It is unfortunate that Paragraph 3.4 fails to subdivide public transport into the modes of train and bus. This is a particular issue for residents in Wharfedale, many of whom commute into Leeds and Bradford, as the most popular mode of public transport is the Wharfedale train line into Leeds and Bradford. This train line has a finite capacity which is consistently reached during peak hours. Further housing development along these corridors will compromise this capacity potentially leading to the percentage traveling by car increasing. Therefore, Wharfedale Friends of the Earth would recommend a detailed analysis of these constraints before favouring the options of maximizing development at public transport nodes, in the main centres and along existing transport routes. This principle should also be applied to development in the Aire Valley which suffers from similar capacity constraints.</p> <p>The option of locating housing development closer to jobs and key services and creating mixed use development areas may help to reduce the need to travel which should be the primary priority of a sustainable transport policy. It should be noted that there should be a strong presumption against new developments that are not served by high quality public transport services.</p> <p>Encouragement of the sustainable transport modes of cycling and walking through creation of new infrastructure for these modes which are user-friendly, direct and safe should be a preferred option of the LDF.</p>	Wharfedale Friends of the Earth
<p>We welcome the options to maximise development and locate new service facilities in the main centres. Quality cycle and footpath networks across the district should also be implemented</p>	Yorkshire Forward
<p>5.2 HOW CAN THE LDF ASSIST IN SECURING ACCESSIBILITY TO JOBS, SERVICES AND FACILITIES FOR NEW DEVELOPMENT?</p>	
<p>Bradford Chamber would oppose restrictions placed on new developments, unless overwhelming evidence outweighs arguments to support how and why they assist economic development.</p>	Bradford Chamber
<p>See comments above</p>	Bradford tPCT (
<p>All options, but cycling and footpaths likely to be minimal contribution</p>	Ilkley Civic Society

<ul style="list-style-type: none"> • Continue with the existing approach negotiating improvements to accessibility to all developments for cyclists, pedestrians and public transport • Locate new housing development closer to jobs and key services • Create areas of mixed-use development which can be accessed by different modes of transport • Maximise development at public transport nodes • Maximise development in the main centres and along public transport routes • Create more long distance cycle facilities and footpath networks • Locate new service facilities in the main centres along public transport routes • Ensure new development is designed to provide more direct, safer routes for cyclists and pedestrians • Restrict new developments attracting higher number of people such as larger employment uses, leisure, education and larger housing schemes to Bradford City Centre and the town centres and other areas of high public transport accessibility • Ensure proposed development is accessible to all, including disabled people through establishing accessibility criteria in assessing minimum standards of public transport, cycling and walking provision, and inclusive design in new developments <p>Ensure redevelopments attracting large numbers of people, which are located in areas of low public transport accessibility, are accompanied by a Travel Plan.</p>	
<p>By adopting options 2 to 8 and 11.</p> <ul style="list-style-type: none"> • 2. Locate new housing development closer to jobs and key services • 3. Create areas of mixed use development which can be accessed by different modes of transport • 4. Maximise development at public transport nodes • 5. Maximise development in the main centres and along existing transport routes • 6. Create more long distance cycle and footpath networks • 7. Locate new service facilities in the main centres and along public transport routes • 8. Ensure new development is designed to provide more direct, safer routes for cyclists and pedestrians • 11. Ensure redevelopments attracting large numbers of people, which are located in areas of low public transport accessibility are accompanied by a Travel Plan. <p>I would suggest that limiting larger housing schemes to areas of high public transport accessibility is not too</p>	<p>Metro</p>

<p>important as the new development could fund and maintain new public transport services. For travel plans to be effective they need to have targets that are enforced by BMDC. I would also like to see BMDC use developer contributions to fund bus services to inaccessible locations, e.g. Euroway (I will also submitted a response to the draft SPD outlining my proposals in more detail).</p>	
<p>The <i>application and promotion of both workplace travel plans and personalized travel plans</i> will, if matched with further investment in public transport, cycling and walking enhance the use of these modes. This should, in any case, be applied before any increases in road space availability for passenger cars.</p>	<p>Wharfedale Friends of the Earth</p>
<p>CONGESTION</p>	
<p>5.3 HOW CAN THE LDF TRANSPORT POLICIES INFLUENCE THE LEVEL OF CAR USE AND ROAD CONGESTION?</p>	
<p>There is now considerable congestion in Shipley. The increased housing in Baildon cannot but add to this. A Shipley eastern by pass is needed.</p> <p>We do not believe that limited parking space in housing developments is helpful as it leads to more parking on roads. Our preferred options are to</p> <ol style="list-style-type: none"> 1. <i>Promote alternatives to care travel i.e. bus, train, walking and cycling (where this is feasible) requiring development to ensure access to these modes of transport. We are strongly of the opinion that people will not abandon cars until much better public transport is available.</i> 2. <i>Create areas of mixed use development, which can be accessed by different forms of transport</i> 3. <i>Promote the movement of freight by rail.</i> 4. <i>Locate developments in areas of high public transport accessibility</i> 	<p>Baildon Community Council</p>
<p>Congestion does need to be reduced in the increasing areas where it appears in the district. <i>We support initiatives that lead to developments being accessed by different transport modes</i>, but do not want to see restrictive measures that could have negative effects on commerce.</p> <p>Restricting car parking is one such measure and so, while encouraging the use of public transport is acceptable, discouraging car use is not. Removal of car parking space invariably arrests commercial growth and operations.</p> <p>Locations requiring significant footfall (e.g. retail and mixed use developments) should have high public</p>	<p>Bradford Chamber</p>

<p>transport accessibility as well as other facilities such as parking.</p> <p>There is no objection in principal to locating developments that have low public transport accessibility (but with good road connections), but there may be a need for other changes to take place. Road capacity may need increasing if the development is out-of-town; public transport (such as a city-link bus service) improvements for town centres may be required; and the support and commitment of a developer may be secured in planning agreements setting out assurances that the developer 'make good' the necessary infrastructure improvements.</p> <p>Particular sites/localities may be amenable to the development of Park-&-Ride operations, which could reduce car use. Further consideration should be given to this potential, perhaps in Odsal and other areas of Bradford</p>	
<p>Second and third options together provide the best solution:</p> <ul style="list-style-type: none"> • <i>Limit car parking to discourage car use and encourage the use of buses, trains, cycling and walking</i> • <i>Create areas of mixed use development which can be accessed by different modes of transport</i> 	Bradford tPCT
<p>Issues around transport and travel planning are key in tackling climate change. The Local Transport Plan and the Economic Partnership have already raised concerns about Bradford's poor links to the transport networks. The District is disconnected from the main motorway system, has poor links through Airedale and to Leeds/Bradford Airport. Road improvements are needed around Saltaire, better access is needed around Shipley and Baildon as is set out in the arguments for the Shipley Eastern by-pass and the need for improved connections from the M606 to Leeds side of the city. Improvements are also needed to the existing rail network and stations, particularly Shipley Station. Expanding those rail services currently working at capacity and new rail services should be installed wherever viable e.g. the link through Otley to Harrogate. Priority needs to be also given to make the District an attractive and safe one to get around by cycle and on foot. Particular attention needs to be given to ensure there are 'greenway' routes between stations and College and University buildings and nearby sites of major occupancy such as Douglas Mill on Manchester Road.</p>	Environmental Partnerships
<p>Whilst a mix of options may be desirable, inclusion of those which would lead to significantly increased car use are unlikely to reflect national and regional policy. The focus should be on non-car modes, especially public transport. It should also be recognised that whilst important and should be pursued, some options, eg</p>	Government Office for Yorkshire and Humber

freight by rail, may not have a significant impact on congestion in the foreseeable future.	
It is felt that neither of these options alone should be chosen. A <u>combination of these options would provide the best tool for reducing congestion in the district.</u> Of the options provided in the report it is felt that the option to locate development in areas of low public transport accessibility but good road connections would not be a sustainable option and would encourage the use of the private car, therefore adding to congestion problems.	Highways Agency
The LDF transport policies can influence the level of car use and road congestion by restricting available car parking , especially in city and town centres, and by creating more pedestrian areas within them. Where car parks do exist, the cost could be increased to such an extent that car owners are encouraged to think of other means of travel i.e. public transport	J Hill
<p>Bullets 1,2 and 6 - Options:</p> <ul style="list-style-type: none"> • Promote alternatives to travelling by car, i.e bus, train, walking and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plan); and by protecting and enhancing bus, train, walking and cycling networks • Limit car parking to discourage car use and encourage the use of buses, trains, cycling and walking (e.g. restrict new car parks in town centres, minimise the amount of parking at new development) • Locate development in areas with high public transport accessibility but good road connections 	Ilkley Civic Society
<p>Bullets 1, 3 and 4 – Options</p> <ul style="list-style-type: none"> • Promote alternatives to travelling by car, i.e bus, train, walking and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plan); and by protecting and enhancing bus, train, walking and cycling networks • Create areas of mixed use development which can be accessed by different modes of transport • Create more long distance cycle routes and footpath networks 	Ilkley Parish Council
By adopting options 1-6:-	Metro

<ol style="list-style-type: none"> 1. Promote alternatives to travelling by car, i.e bus, train, walking and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plan); and by protecting and enhancing bus, train, walking and cycling networks 2. Limit car parking to discourage car use and encourage the use of buses, trains, cycling and walking (e.g. restrict new car parks in town centres, minimise the amount of parking at new development) 3. Create areas of mixed use development which can be easily accessed by different modes of transport 4. Create more long distance cycle routes 5. Promote the movement of freight by rail 6. Locate development in areas with high public transport accessibility but good road connections <p>And <u>adding another</u> to the effect of “New developments and/or redevelopments along key bus corridors should, where necessary, provide sufficient site frontages for a bus lane, or contribute to bus priorities along that corridor.”</p>	
<p>The most important contribution the LDF can make to reduce car use is to direct development to areas with existing public transport and community infrastructure. We <u>support the first six options</u> given but not the seventh or eighth: developments should not be located away from existing public transport accessibility unless provision of sufficient additional public transport is planned. Increasing road capacity is likely to increase rather than minimise congestion and therefore is an unsustainable option.</p>	<p>RSPB</p>
<p>If the success of [PPG13- Restricting car parking spaces] this measure is to be applied successfully then it should be coupled with the encouragement of the use of cycling (including the provision of secure cycling parking spaces), walking and public transport.</p> <p>Consent for new developments, particularly in busy traffic corridors, should be conditional on the protection, enhancement of facilities for and effective promotion of non-car modes. This should include creating car-free areas, safe routes to schools, separated cycling lanes, collaboration with public transport providers and the implementation of travel planning appropriate to the development.</p>	<p>Wharfedale Friends of the Earth</p>

<p>The options of locating development in areas of low public transport accessibility but good road connections and increasing road capacity to accommodate traffic will increase car dependency. Increased road capacity often leads to induced demand and subsequent congestion problems with higher volumes of traffic. For these reasons, we would recommend that these two options are discarded.</p>	
<p>It is important that the core strategy provides support for the provision of a high quality public transport system through the use of integrated public transport networks. Additionally, designated bus lanes can reduce journey times within urban areas, thus enabling the frequency of bus services to increase and providing additional capacity during peak times. We welcome the measures to support highway capacity through Shipley/ Saltaire and Bradford city centre, also the option to facilitate freight movement by rail within the district, as this will reduce congestion levels and reduce greenhouse gas emissions (and air pollution within urban areas)</p>	<p>Yorkshire Forward</p>
<p>The Assembly <u>does not support</u> locating development in areas of low public transport accessibility but good road connections as a means of influencing levels of car use and road congestion.</p>	<p>Yorkshire and Humber Assembly</p>
<p>ROAD SAFETY</p>	
<p>5.4 HOW CAN THE LDF TRANSPORT POLICIES IMPROVE ROAD SAFETY?</p>	
<p>In terms of road safety. whilst highway design is important, the wider design issues relating to buildings/developments as a whole are important.</p>	<p>Government Office for Yorkshire and Humber</p>
<p>Bullets 2 and 3 – Options:</p> <ul style="list-style-type: none"> • Develop new highway design policies to ensure safety, within and in the vicinity of new developments, for cyclists, pedestrians and other vehicle users. • Require financial contributions from developers to improve safety on existing roads affected by new development 	<p>Ilkley Civic Society</p>
<p>All options</p> <ul style="list-style-type: none"> • Continue with existing highway design policies for new development, which concentrate on making provision for car traffic • Develop new highway design policies to ensure safety, within and in the vicinity of new 	<p>Ilkley Parish Council</p>

<p><i>developments, for cyclists, pedestrians and other vehicle users.</i></p> <ul style="list-style-type: none"> • <i>Require financial contributions from developers to improve safety on existing roads affected by new development</i> 	
<p>By adopting options 2 and 3,</p> <ul style="list-style-type: none"> • <i>2. Develop new highway design policies to ensure safety, within and in the vicinity of new developments, for cyclists, pedestrians and other vehicle users.</i> • <i>3. Require financial contributions from developers to improve safety on existing roads affected by new development</i> <p>But ensuring under option 3 that road safety measures don't impede public service vehicles. Reference should be made to the new "Places, Streets and Movements" Guide.</p>	Metro
<p>This is an area that Wharfedale Friends of the Earth has neither expertise in nor particular opinions on apart from recognizing the strong social benefits of maximizing road safety and so we would endorse improvement measures.</p> <p>As an additional note, Bradford District Council should recognize the role that the perception of safety plays in modal choice. Higher perceptions of risk discourage cycling and walking thus creating a vicious circle. The improvement of road design and the provision of safe routes for pedestrians and cyclists should be a priority for the authority.</p> <p>This should have higher priority than improving safety for car traffic. Again, perception of safety has a role to play on behaviour insofar as a lower perception of risk provided by enhanced highway design encourages car drivers to drive at higher speeds thus increasing danger for other road users. Safety for drivers should be enhanced by the use of speed limits (e.g. increased implementation and enforcement of 20mph zones in residential areas).</p>	Wharfedale Friends of the Earth
AIR POLLUTION / ENVIRONMENT	
5.5 HOW CAN THE LDF TRANSPORT POLICIES MINIMISE THE EFFECTS OF NOISE, VIBRATION AND AIR POLLUTION CAUSED BY TRAFFIC?	
All of the options have merit and are interdependent.	Bradford tPCT

<ul style="list-style-type: none"> • Promote alternatives to travelling by car, i.e. bus, train, walking, and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plans); and by protecting and enhancing bus, train, walking and cycle networks. • Limit car parking to discourage car use and encourage the use of buses, trains, cycling, walking • make provision for lorry parks at appropriate locations • Promote the movement of freight by rail • Locate development in areas with high public transport accessibility 	
<p>LDF Policies are limited in what they can do to minimise the effect of the above [pollution]. When required, Air Quality Management Zones are set up to develop strategies to deliver improvements to air quality.</p>	Environmental Partnerships
<p>In terms of air quality and environment it is felt that a <u>variety of policy options</u> would be the best to reduce the environmental impact of travel from new developments.</p>	Highway Agency
<p>Bullets 1,2, 4 and 5 – Options</p> <ul style="list-style-type: none"> • Promote alternatives to travelling by car, i.e. bus, train, walking, and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plans); and by protecting and enhancing bus, train, walking and cycle networks. • Limit car parking to discourage car use and encourage the use of buses, trains, cycling, walking • Promote the movement of freight by rail • Locate development in areas with high public transport accessibility <p>Also prevent lorries at night in residential areas - this should be a major factor in siting retail with 24hr deliveries.</p>	Ilkley Civic Society
<p>The first option is of most importance</p> <ul style="list-style-type: none"> • Promote alternatives to travelling by car, i.e. bus, train, walking, and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plans); and by protecting and enhancing bus, train, walking and cycle networks. 	Ilkley Parish Council

<p>All options seem reasonable/acceptable.</p> <ul style="list-style-type: none"> • Promote alternatives to travelling by car, i.e. bus, train, walking, and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plans); and by protecting and enhancing bus, train, walking and cycle networks. • Limit car parking to discourage car use and encourage the use of buses, trains, cycling, walking • make provision for lorry parks at appropriate locations • Promote the movement of freight by rail • Locate development in areas with high public transport accessibility 	<p>Metro</p>
<p>We support the first, second, fourth and fifth options developed, but encourage the Council to focus on the first and fifth (*) when forming Core Strategy policy.</p> <ul style="list-style-type: none"> • Promote alternatives to travelling by car, i.e. bus, train, walking, and cycling by requiring development to support measures which ensure access by these modes of transport (including the adoption of travel plans); and by protecting and enhancing bus, train, walking and cycle networks. * • Limit car parking to discourage car use and encourage the use of buses, trains, cycling, walking • Promote the movement of freight by rail • Locate development in areas with high public transport accessibility 	<p>RSPB</p>
<p>The biggest concern on environmental grounds should be climate change. It is imperative on Bradford District Council to make the reduction of carbon emissions an overriding principle in the development of the LDF.</p> <p>As part of a carbon reduction strategy, the Council should seek to promote alternatives to the car and requiring developments to increase access to these modes should be seen as a priority. Discouraging car use through the restriction of parking spaces and the promotion of travel plans should also be a condition placed on planning consent for new developments.</p> <p>Where development is permitted containing a large amount of on-street parking, the Council should encourage the use of fuel-efficient vehicles by promoting the charging for parking permits based on the</p>	<p>Wharfedale Friends of the Earth</p>

<p>carbon emissions of the vehicle for which the permit is issued.</p> <p>There is a <u>limited scope for the development of rail freight</u> to impact on climate change. Evidence suggests that rail freight is only successful in creating modal shift where there are large-scale industrial users. These are only evident in the south of Bradford and analysis should be undertaken to investigate the potential for users in this area to use rail freight in a cost-effective and efficient manner.</p> <p>The location of development in areas with high public transport accessibility should be supported subject to the capacity constraints of those public transport modes. Where developments are proposed that are not served by public transport then consent should be conditional on the provision of means to reduce car dependency.</p> <p>Caution should be taken in developments that promote, support or encourage the use of the airport to the disadvantage of other modes of transport. Such developments include hotels, industrial and office units marketed as being close to the LBA airport.</p>	
<p>ECONOMY</p>	
<p>5.6 HOW THE LDF TRANSPORT POLICIES CAN SUPPORT ECONOMIC ACTIVITY AND REGENERATION EFFORTS?</p>	
<p><u>Some further options should be considered:</u></p> <ul style="list-style-type: none"> • Ensure that the Bradford labour force has high quality access to employment opportunities in the region and beyond (e.g. Manchester) reflecting the fast growing workforce and travel-to-work patterns that are emerging. • Restrict major new developments to the urban centres. • Focus attention on access into, out of and around the City Centre (the pre-occupation with highway capacity through Shipley/Saltaire detracts from this). • Work with relevant rail agencies and interests to promote the redevelopment of the two city stations and the quality of services and rolling stock. • Develop a parking strategy for Bradford City Centre. • Rationalise the bus network and services in Bradford City Centre. 	<p>Bradford Centre Regeneration</p>
<p>There are particular <u>difficulties with increasing the highway capacity through Saltaire</u>. Any proposals must</p>	<p>English Heritage</p>

<p>endure that the character and setting of the world heritage site is safeguarded and should have due regard to the capacity study.</p>	
<p>It is clear that transport is key in supporting the economic growth of Bradford, and key business destinations should be highly accessible. However, the Agency feels that accessibility through public transport should be promoted over accessibility by car. It is considered that increasing highway capacity.</p>	<p>Highway Agency</p>
<p>Bullet 2 – option</p> <ul style="list-style-type: none"> • Support measures to improve highway capacity through Shipley/Saltaire and Bradford City Centre to facilitate regeneration and support the master Plans for these areas and other parts of the District’s Strategic Highway Network, including requiring financial contributions from new developments <p>The Shipley/Saltaire problems need to be sorted out in order to allow Shipley to regenerate successfully.</p>	<p>Ilkley Civic Society</p>
<p>All options are viable</p> <ul style="list-style-type: none"> • 1. Ensure high level of accessibility to key business destinations, including city and town centres, industrial and regeneration areas, and Leeds/Bradford Airport • 2. Support measures to improve highway capacity through Shipley/Saltaire and Bradford City Centre to facilitate regeneration and support the master Plans for these areas and other parts of the District’s Strategic Highway Network, including requiring financial contributions from new developments • 3. Continue with existing policies, influencing the type of industrial proposals on established industrial areas taking into account traffic generation • 4. Support capacity improvements for Heavy Goods Vehicles on the Strategic Highway Network through developer financial contributions. • 5. Facilitate freight movement through the district via rail 	<p>Ilkley Parish Council</p>
<p>By adopting options 1 [Ensure high level of accessibility to key business destinations, including city and town centres, industrial and regeneration areas, and Leeds/Bradford Airport] (but worded as ...”high level of accessibility BY SUSTAINABLE TRANSPORT MODES.....”), 3 and 5.</p> <p>Under option 2 [Support measures to improve highway capacity through Shipley/Saltaire and Bradford</p>	<p>Metro</p>

<p>City Centre to facilitate regeneration and support the master Plans for these areas and other parts of the District's Strategic Highway Network, including requiring financial contributions from new developments] I support measures to open up land to facilitate regeneration in Shipley/Saltaire and Bradford City Centre and require financial contributions from new developments. However, I do not support the blanket improvement of highway capacity without the incorporation of the following policies:</p> <ul style="list-style-type: none"> • Improvements to the provision of public transport will be integral to any highway capacity improvements (e.g. through ensuring bus priorities are built into all schemes to improve highway capacity) • Schemes to improve highway capacity will incorporate measures to lock in the benefits and/or manage demand. 	
<p>It should therefore be imperative on the authority to improve accessibility by promoting economic development in the proximity of residential areas so that walking and cycling to work can be facilitated. Businesses promoting development should ensure that these modes of travel are encouraged (e.g. through providing shower facilities for cyclists, secure cycle storage and limiting the amount of car parking space)</p> <p>Improving highway capacity is not a sustainable means of promoting economic development due to the phenomenon of induced demand.</p> <p>The authority should seek to increase the economic development of small, local businesses by encouraging local sourcing of goods and services. This would be much more productive for economic development than increasing highway capacity for Heavy Goods Vehicles.</p>	<p>Wharfedale Friends of the Earth</p>
<p>Q 5.7 HOW THE LDF TRANSPORT POLICIES CAN SUPPORT THE EFFECTIVE, EFFICIENT AND SUSTAINABLE MOVEMENT OF FREIGHT IN THE DISTRICT?</p>	
<p>Bullet 2 – option</p> <ul style="list-style-type: none"> • Support measures to improve highway capacity through Shipley/Saltaire and Bradford City Centre to facilitate regeneration and support the master Plans for these areas and other parts of the District's Strategic Highway Network, including requiring financial contributions from new developments <p>The Shipley/Saltaire problems need to be sorted out in order to allow Shipley to regenerate successfully.</p>	<p>Ilkley Civic Society</p>

<p>By adopting options 1 [Ensure high level of accessibility to key business destinations, including city and town centres, industrial and regeneration areas, and Leeds/Bradford Airport] (but worded as ...”high level of accessibility BY SUSTAINABLE TRANSPORT MODES.....”), 3 and 5.</p> <p>Under option 2 [Support measures to improve highway capacity through Shipley/Saltaire and Bradford City Centre to facilitate regeneration and support the master Plans for these areas and other parts of the District’s Strategic Highway Network, including requiring financial contributions from new developments] I support measures to open up land to facilitate regeneration in Shipley/Saltaire and Bradford City Centre and require financial contributions from new developments. However, I do not support the blanket improvement of highway capacity without the incorporation of the following policies:</p> <ul style="list-style-type: none"> • Improvements to the provision of public transport will be integral to any highway capacity improvements (e.g. through ensuring bus priorities are built into all schemes to improve highway capacity) • Schemes to improve highway capacity will incorporate measures to lock in the benefits and/or manage demand. 	<p>Metro</p>
<p>ADDITIONAL QUESTION 5.8: WHERE IN BRADFORD SHOULD CAR ACCESS BE RESTRICTED AND HOW?</p>	
<p>All pavements and pedestrian precincts! Consideration should be given to pedestrianising The Grove, Ilkley, at weekends.</p>	<p>Ilkley Civic Society</p>
<p>In town and city centres.</p>	<p>Metro</p>
<p>Car access should be restricted in the Bradford City Centre area by not providing any additional long stay parking places and also consideration should be given to a peak period congestion charge.</p>	<p>Transport 2000 – West Yorkshire</p>
<p>Car usage should be discouraged in all areas but particularly in areas that are currently suffering from high levels of congestion or where other vulnerable road users are being discouraged.</p> <p>This can be achieved through a number of measures including:</p> <ul style="list-style-type: none"> • Promotion of car free areas in residential developments • Promotion of mixed-use development to reduce the need to travel. 	<p>Wharfedale Friends of the Earth</p>

<ul style="list-style-type: none"> • Ensuring that developments are accessible for walking, cycling and public transport. • Implementation of pricing mechanisms to discourage driving. Bradford could investigate the possibility of implementing road/congestion charging for the city Centre. • Development of facilities to encourage walking, cycling and public transport taking into account the transport needs of all sectors of the population 	
ADDITIONAL QUESTION 5.9 WHAT DO YOU THINK ARE THE BEST WAYS OF REDUCING THE IMPACT OF TRAFFIC ON THE RESIDENTS OF BRADFORD DISTRICT?	
Bradford has no direct train service to Sheffield, only a circular via Leeds. By extending the present Skipton-Bradford train service to Barnsley and Sheffield via Spen Valley the road user would have an alternative to grid locked roads at Shipley/Saltaire, Odsal, M606, M62 and M1 etc	C.V Barton
The priorities should be increasing the attraction for multi-occupancy car use and non-car modes as well as making more space for pedestrians	Environment Partnerships
I think that making 1. new development accessible, 2. restricting available parking, 3. increasing funding for non care modes, 4. more space for pedestrians and 5. more bus priority measures.	J Hill
3. Increase funding for non-car modes 4. More space for pedestrians 5. More bus priority measures Also do something to make buses and bus stations more attractive	Ilkley Civic Society
Provide parking for everyone that wants it	Ilkley Parish Council
Options 1-5 (definitely not 6 and 7!) 1.new development accessible 2. restricting available parking 3. Increase funding for non-car modes 4. More space for pedestrians	Metro

5. More bus priority measures	
Priority should be given to walking and improving public transport.	Transport 2000 – West Yorkshire
Options 1-5 should be used to encourage <ol style="list-style-type: none"> 1. Make new development accessible 2. Restrict available parking 3. Increase funding for non-car modes 4. More space for pedestrians (should be the preferred option) 5. More bus priority measures <p>Options 6 and 7 (Increase Road space & Provide parking for everyone who wants it) will merely lead to increased levels of traffic and fail to reduce the impact of traffic. These options should be discarded.</p>	Wharfedale Friends of the Earth
Additional Question 5.10 How do you think that public transport services can be realistically improved? Should the council treat public transport improvements as a higher priority than highway improvements?	
More funding, more measures to encourage its use and certainly the council should treat public transport improvements as a higher priority than highway improvements. Building more roads and widening existing roads only encourages more traffic and, as we all know, this is becoming or has indeed become a very real problem which is better tackled now rather than later when things get worse	J Hill
We need more and better buses, better routes, and more reliable journey times. 'Yournextbus' will help, but more initiatives needed. On the trains, the constraints are single line working on the Wharfedale line and Baildon links.	Ilkley Civic Society
Consultation with other users should improve public transport services although highway improvements should be a priority	Ilkley Parish Council
Public transport services should be given more highway capacity and priority over the private car. S106 moneys should be pooled and used to pump prime new services, or keep important services (such as	Metro

<p>MetroConnect 3 to Euroway) going. Public transport improvements are higher priority than highway improvements (unless the highway improvements introduce bus priority measures!)</p>	
<p>Public transport can be realistically improved by the following:-</p> <ol style="list-style-type: none"> 1. Improvements to Bradford's very poor railway services by opening new stations at Low Moor and Laisterdyke. 2. More frequent service between Bradford and Leeds via New Pudsey. 3. Reopen the branch to Otley. 4. The Leeds City Region Vision advocated turning the Shipley to Bradford Foster Square rail services over to 'Tram – Train' operation. This has huge implications for improving services in Bradford. It would then be logical to extend the trams through the centre of Bradford to the Interchange station to link up with railways to the south. There should therefore be proposals in LDF to safeguard a street based tramway right of way between the two Bradford stations and through the centre of Bradford. In view of the Leeds City Region Proposals it would be very short sighted for Bradford not to include this. 5. Reopen the Spen Valley railway from Dewsbury to Bradford (via Low Moor). 6. Bus priority measures should be considered on all roads into Bradford giving buses priority over car traffic. 7. Public transport 'park & ride' schemes should be considered. <p>The above measures will make a very big improvement to the attractiveness of public transport but to achieve this will involve spending being switched from road building to instead being invested in public transport.</p>	<p>Transport 2000 – West Yorkshire</p>
<p>Public transport can be improved by increasing the capacity to carry passengers in peak periods. This can be most effectively done by creating more dedicated road space for public transport e.g. more bus lanes, priority for buses at junctions, development of carefully considered park and ride schemes.</p> <p>Developments should only be approved where there is sufficient evidence that the developer will maximize the use of public transport. This may include financial contributions from the developer to improve accessibility for public transport. Developments should be discouraged where there is a clear emphasis on catering for the car driver (e.g. developments adjacent to the district's motorway junctions).</p> <p>The Council should treat the improvement of public transport as a key priority in ensuring traffic reduction.</p>	<p>Wharfedale Friends of the Earth</p>

This will have a subsidiary benefit of reducing the need to implement highway improvements.	
ADDITIONAL QUESTION 5.11 WHEN FUNDING IS OBTAINED FROM NEW DEVELOPMENTS (THROUGH SECTION 106 AGREEMENTS) TOWARDS NON-CAR MODES, HOW SHOULD THIS BE SPENT?	
<p>3. Public Transport The problem with walking is that most people cannot find the time and are carrying out complex multi purpose journeys – i.e. school, health visit, shopping, work and leisure all in one trip.</p>	Ilkley Civic Society
<p>1. Promoting walking, 2. Promoting cycling and improving cycling facilities</p>	Ilkley Parish Council
<p>Provision of an accessible public realm should be provided by site design and layout. All new developments over a certain size (e.g. 50 residential units) should provide an enforceable Travel Plan that involves/incorporates promotion of all sustainable transport modes. Cycling and walking facilities should be built into a new development as a matter of course, therefore S106 money should be spent on public transport.</p>	Metro
For a city the size of Bradford funding through Section 106 agreements should be used for investing in the rail network to improve the present very poor facilities.	Transport 2000 – West Yorkshire
<p>This should be spent on reducing the need to travel as a key priority. This comes under the remit of providing an accessible public realm by ensuring that key services and</p> <ul style="list-style-type: none"> <input type="checkbox"/>enters of employment are close to residential areas. <p>Beyond this the money should be spent according to the following hierarchy:</p> <p>5. Pedestrians 6. Mobility-impaired 7. Cyclists 8. Public transport</p>	Wharfedale Friends of the Earth

Additionally, the Council should engage in full consultation with local residents and the respective transport user groups to ensure that the funds are spent most effectively and appropriately to the local situation.	
ADDITIONAL QUESTION 5.12 DO YOU THINK THAT CURRENT MAXIMUM PARKING STANDARDS ARE APPROPRIATE OR DO YOU THINK THAT THESE SHOULD BE CHANGED?	
2. Be based on public transport accessibility Town/city centre dwellings without parking facilities are viable - until the occupants acquire a car	Ilkley Civic Society
Allow higher levels of parking	Ilkley Parish Council
I support options 1, 2 and 4. 1. Allow less parking therefore further restrain car use 2. Be based on public transport accessibility 3. Allow for car-free residential development where there are Controlled Parking Zones 4.	Metro
All the areas identified are important and the provision of new or additional facilities needs to be based on what already exists and any under provision in certain areas. Therefore no exact priorities can be set. However, general improvements in all areas of none car mode of transport should be the overall objective	Natural England
Additional parking should be restricted to public transport 'park & ride' schemes.	Transport 2000 – West Yorkshire
Further restricting parking standards could be effective in reducing car use as an effective tool to encourage greater usage of non-car modes. The provision of car-free residential developments should be allowed as they lead to a higher quality of life for residents and a greater usage of walking and cycling for short trips through a reduced perception of risk to safety. Regeneration should be encouraged in areas of social deprivation but it should be recognized that these	Wharfedale Friends of the Earth

areas have a lower incidence of car-ownership and, therefore, the provision of parking is less appropriate than public transport accessibility.	
The core strategy should encourage a car parking policy based upon increasing levels of 'short stay' provision within urban areas (specifically Bradford) to encourage shoppers back into city and town centres, whilst the level of long stay parking provision should be reduced to encourage commuters to choose more sustainable forms of travel. Additionally, new developments should aim to adopt a level of parking provision in line with the Regional Transport Strategy policy T2.	Yorkshire Forward
ADDITIONAL QUESTION 5.13 WHERE SHOULD WE PROVIDE LORRY PARKS	
Lorry parks should be accessible from main routes. Unofficial overnight lorry parking should be challenged by the authorities.	Ilkley Civic Society
Lorry parks should not be provided. These should be the responsibility of the lorry operators.	Transport 2000 – West Yorkshire

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