



DRAFT BRADFORD DISTRICT LOCAL PLAN 2020-2038
PREFERRED OPTIONS – REGULATION 18 CONSULTATION
FEBRUARY 2021

GREEN BELT SIGNPOSTING DOCUMENT

Disclaimer:

The initial Green Belt Strategic Parcel Assessment and Site Specific Assessments are made available as part of the Local Plan evidence and have informed the Local Plan Preferred Option site assessments. It should be noted that this evidence represents the Council's initial assessment of Green Belt land in the District as part of the Selective Green Belt Review and the council invite further representations to be made in regards to the overall approach, strategic parcel and site specific assessments undertaken to date. The Council will consider all representation made and will continue to develop and finalise this evidence as part of the Local Plan preparation and justification of the Exceptional Circumstances for any proposed amendments to established Green Belt boundaries through the Local Plan process.

1. INTRODUCTION

This is a short note which lists and explains the range of material which the Council have produced in relation to the green belt as part of or in support of the current draft Local Plan regulation 18 consultation. It is intended to assist with public and stakeholders who want to ensure that they have accessed the most relevant material on this matter.

2. NATIONAL POLICY

National planning policy is set out by the Government in the National Planning Policy Framework (NPPF). Section 13 of the NPPF is the main section which deals with the Green Belt although there are various other references to it of relevance throughout the document.

It is not the intention of this note to set out national green belt policy in detail. However, two of the most important elements of national guidance are included for information below.

Firstly, it states that green belt serves 5 purposes (paragraph 134)

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Secondly, the NPPF at para 136 states that once established, green belt boundaries should only be altered in exceptional circumstances. The NPPF does allow for Local Plans to make such changes when such circumstances exist but sets out a number of principles which should be met before such a conclusion can be reached such as ensuring that as much use as possible has been made of brownfield land (para 137)

3. THE CURRENT STATUTORY DEVELOPMENT PLAN AND CURRENT GREEN BELT

The Replacement Unitary Development Plan (RUDP) 2005

The green belt for Bradford was first comprehensively established within the Unitary Development Plan which was finalised and adopted in 1998. The subsequent review of that plan – the Replacement Unitary Development Plan – was adopted in 2005 and barring the release of a small number of sites maintained the greenbelt boundaries largely unchanged. Both documents were accompanied by a Proposals Map which defined the green belt boundaries as well as indicating a wide variety of development sites and designated areas designed to protect or conserve areas of environmental importance.

The Replacement Unitary Development Plan and its proposals map showing the current extent of the green belt can be viewed on the Council's web pages at the following location:

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/replacement-unitary-development-plan/>

The Core Strategy 2017

All statutory development plans broadly comprise 2 parts –

- a strategic policy element which sets out the how much development is to be planned for based on expected and projected demographic, economic and social change and a spatial strategy for doing so and;
- a more detailed element which indicates sites which are identified to meets the districts needs for homes, jobs and new infrastructure and areas which are to be conserved and protected. These range from formal and informal open spaces and playing pitches, to areas of value for wildlife, ecology, or heritage reasons.

In 2017 the Council completed and adopted a document – the Core Strategy - setting out a planning strategy for the district over the period 2013-30. It set out how many homes would be needed and how much land would be planned for to provide for jobs and economic growth.

Based on the evidence available at the time and in applying government policy in place at the time, it indicated that exceptional circumstances existed for changes to the green belt and such changes were necessary to ensure that sufficient land would be available to meet the need for homes and jobs.

The most relevant policies within the Core Strategy relating to the green belt and the need to release land for homes and jobs were – Policy SC7, Policy HO1, Policy HO2, Policy HO3 and Policy EC3.

The Core Strategy set out a requirement to allocate land for approximately 42,100 new homes with an estimate that 11,000 of these may need to be on green belt land and indicated that some green belt releases would also be required to contribute to the overall need for 135ha of employment land.

The Core Strategy is available to view at the following location

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/?Folder=10\Adopted+core+strategy>

The Core Strategy only set out the planning strategy for the district – the proposals for development sites to meet the need for new homes and jobs were to be set out within a series of further Development Plan documents most notably the Allocations DPD.

THE EMERGING LOCAL PLAN AND GREEN BELT IMPLICATIONS

The Core Strategy Partial Review (CSPR)

The Council began a partial review of the Core Strategy in 2018 and among the elements of the plan which were to be reassessed were the need for new homes and jobs, the spatial distribution of development and thus by implication the need for green belt releases.

Two consultation exercises have already been carried out on the CSPR - a scoping report was issued in January 2019 and a Preferred Options Document in July 2019.

The Preferred Options document of July 2019 set new targets for the number of new homes that were to be required and planned for (26,150) over a new plan period of 2020-2037 and again indicated that exceptional circumstances required the alteration of green belt boundaries and release of green belt land to meet this requirement. The expected extent of green belt releases at that time was of the order of just under 5,000 units.

The Core Strategy Partial Review Documents area available at the following location:

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/?Folder=Core+Strategy+Partial+Review>

The Draft Bradford District Local Plan 2021

The Council have now decided to combine the various elements of the plan into one document rather than separate strategic and site specific elements.

The consultation exercise now underway is therefore on a district wide draft Local Plan which encompasses all strategic policies and all site allocations. The Council have reviewed all the responses to the previous CSPR consultations, updated evidence and the latest national planning guidance and set new policies and targets relating to the amount and distribution of growth and development. It has also identified a draft set of preferred options sites to meet the housing and employment requirements.

The new document sets out a revised requirement for land to be identified for 27,672 homes over a period 2020-38 and a requirement for 72ha of new employment land.

The plan indicates that exceptional circumstances exist for making changes to the green belt boundary in order to meet these needs. It is estimated that around 5 ½ thousand new homes will be needed on sites which currently lie within the green belt and around 40ha of employment land.

Among the most relevant policies to green belt matters within the document are:

- Policy SP5 – Green Belt
- Policy SP6 – Economic Growth
- Policy SP8 – Housing Growth

The draft plan can be viewed in several forms electronically on the council's website at the following address:

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/bradford-district-local-plan/>

EVIDENCE BASE DOCUMENTS WHICH HAVE BEEN PRODUCED AND PUBLISHED

The process for carrying out the review of the green belt and therefore assessing options for possible green belt land releases involved several stages and studies. The documents which have been produced so far are listed below:

Bradford Growth Study (Produced as part of the Evidence Base for the 2017 Adopted Core Strategy)

Having established that green belt releases would be needed to meet the district's needs in full and that exceptional circumstances existed to make change to the green belt the Council commissioned consultants Broadway Malayan to produce a Growth Assessment.

The aim of the study was to inform the Local Plan on the most appropriate and sustainable locations for the development of urban extensions and green belt releases where new housing development may be focussed.

The Growth Assessment comprises two distinct elements:

- i. Directions for Growth
- ii. Sustainability Testing of potential Green Belt Sites

Although the study is now in part superseded by more recent work it is still a document which may be referenced from time to time either by the Council or by site promoters. Its location for those wishing to view it is therefore given below:

[https://www.bradford.gov.uk/planning-and-building-control/planning-policy/evidence-base/?Folder=Background and technical papers\Bradford+Growth+Assessment](https://www.bradford.gov.uk/planning-and-building-control/planning-policy/evidence-base/?Folder=Background+and+technical+papers\Bradford+Growth+Assessment)

Strategic Parcel Assessment

The Council has commissioned consultants ARUPs to assess the contribution which large blocks of land – strategic parcels - make to the 5 green belt purposes.

The Council has previously consulted upon a draft methodology for parcel identification and parcel assessment. The methodology and parcel assessments now published reflect the consultation responses and the testing of the initial methodology.

The parcel assessments and report do not recommend whether the parcels of land should be released from the green belt. It simply provides an assessment and rating of each parcel against each of the 5 green belt purposes and an overall rating. In each case criteria are used to assess whether the parcel performs a low, moderate or major role or whether it makes no contribution at all.

Over 300 parcels have been identified and assessed. It is important to note that these parcels do not cover all green belt land. A number of parameters have been used to delineate parcels of land contiguous with and extending a certain distance from settlements.

The Council is aware that there are still some discrepancies with the results of the parcel assessments which need to be rectified and these will be addressed along with the comments received as part of the consultation.

The methodology for parcel assessment and the parcel assessment results are available here:

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/bradford-district-local-plan/?Folder=Evidence>

Site Specific Green Belt Assessments

Potential development sites which lie within the green belt and which are contiguous with settlement boundaries have all been assessed in terms of their contribution to the 5 green belt purposes. The assessments and the methodology for their assessment is also available online at the location below.

Sites which have been submitted for consideration by the Council during previous call for sites exercises but which are not contiguous with settlement boundaries have been assessed separately using an 'isolated sites' proforma.

The methodology – which broadly mirrors the approach to parcel assessment – but adapts it to provide the right level of information and detail for site assessment has also been published. Again sites have been assessed and rated against the 5 green belt purposes with additional information and assessments relating to boundaries, openness, and the potential for offsite compensatory improvements to the green belt. Each site has its results presented on a standard template / proforma.

As with parcels, the result of the site specific green belt assessments contributes to but do not determine or recommend whether a site should be allocated for development or not. Such decisions reflect the much broader range of evidence relating to each site and the process of sustainability appraisal which has been used to assess all reasonable site options.

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/bradford-district-local-plan/?Folder=Evidence>