

CHAPTER 3

Principal Policies

3.0 Introduction

- 3.1 The Plan's Development Strategy seeks to deal with the implications of the planning issues facing the District in the context of the requirements of National and Regional Planning Guidance. At the time of writing RPG12 Regional Planning Guidance for Yorkshire and Humberside is in review. The Secretary of States approved guidance published in 1996 is with respect to housing and some other policy areas clearly out of date. Where it remains a relevant consideration, as with the role of centres it is referred to. The Secretary of State has published in March his response to the Panels report on its replacement. However as the Council approved the content of this draft of the Plan in March this first deposit draft of the Plan is based on the draft RPG issued in 1999 and the report of the Panel issued in October 2000
- 3.2 The Plan's Development Strategy is comprised of two main elements:-
- The Plan's Principal Policies as listed below. (Detailed policies and proposals in Part Two of the Plan translate the Principal Policies into action through the Development Control function of the Council as Local Planning Authority).
- 3.3 A location strategy which indicates in broad terms how development is to be accommodated.

Principal Policies

Sustainable Patterns of Development

- 3.4 The aim of the Plan is to promote a more sustainable district and a key aspect of this is patterns of development. Advice from the Government in PPG12, PPG13 (and the revised draft of PPG13 issued last year) and PPG3 all stress the importance of promoting more sustainable locations for development. (Note the final version of new PPG13 was published after the completion of this part of the Plan). This approach is carried into revised draft RPG which has also explored the potential of the regions urban areas to accommodate development needs, these being generally more sustainable locations.
- 3.5 In preparing the replacement Plan the Council has had regard to emerging Government thinking on Urban capacity and has drawn on the study of regional urban potential undertaken by Baker Associates in 1998. A number of activities have been undertaken to examine the potential of the districts urban areas and well located smaller settlements to accommodate development particularly housing. These include a vacant land study, an independent examination of conversion potential and examination of the likely trends in infill and windfall provision. A background paper on this work has been published as a supporting document to this first deposit of the replacement plan.

Promoting Sustainable Patterns of Development

- 3.6 This first Principal Policy sets out where development should be located and should be read in conjunction with the second Principal Policy which sets out areas of restraint where development should not be located.

- 3.7 One important tool in promoting sustainable patterns of development is the phasing of development sites on the basis of their relative sustainability. This is particularly useful when dealing with housing provision. The Plan should ensure sites in more sustainable locations come forward first. Therefore the identified supply of housing sites is phased into three stages. Sites for immediate development, sites for the second half of the time period of part 2 of the Plan i.e. between 2009 and 2014, and sites held back beyond the period planned for in part 2 i.e. beyond 2014. Decisions on the phasing of individual sites have been made using the location strategy and where appropriate local circumstances for example major physical constraints are the relevant considerations. The phasing of identified sites also takes account of the examination of the urban capacity of the district. This has led to the holding back of less sustainable greenfield sites to help promote reuse of brownfield sites and buildings in more sustainable locations. (see also the location strategy section of this chapter, the Housing chapter and the supporting document on Urban Capacity).

UDP1

THE LOCATION OF DEVELOPMENT TO MEET THE NEEDS OF THE DISTRICT WILL BE MADE BY

- (1) FOCUSING ON THE URBAN AREAS**
 - (2) ENCOURAGING THE MOST EFFECTIVE USE OF BROWNFIELD SITES AND BUILDINGS**
 - (3) CONCENTRATING DEVELOPMENT IN AREAS WITH GOOD PUBLIC TRANSPORT LINKS**
 - (4) CONCENTRATING DEVELOPMENT IN AREAS WITH PROXIMITY TO ESSENTIAL AND WIDER FACILITIES AND SERVICES**
 - (5) MAKING MOST APPROPRIATE AND EFFECTIVE USE OF SITES CARRIED FORWARD FROM THE CURRENT DEVELOPMENT PLAN**
 - (6) PHASING THE RELEASE OF LAND FOR HOUSING DEVELOPMENT**
- 3.8 This policy sets out the guiding principals behind the location strategy and frames the policies in part 2 of the Plan which give effect to the location strategy as it guides individual developments. These policies are largely found in the urban renaissance, housing, centres and transport and movement topics

Restraining Development

- 3.9 Areas of restraint can be broadly defined and serve a strategic function such as the green belt but at the local level there are small areas which fulfill important functions such as providing a place for children to play.

- 3.10 Within the built up areas there exists a range of open spaces of significant amenity and recreational value. These 'urban greenspaces' have a variety of functions and uses and are of various sizes. Collectively they make an important contribution to the quality of urban life by helping to break up the otherwise heavily built up urban areas, introducing 'breathing space' in the urban form and green areas for people to see and enjoy, and creating wildlife habitats. Their retention helps to prevent 'town cramming'. In addition many of these greenspaces are used for either formal sport or for more passive forms of recreation which are important for exercise and contribute to a healthy lifestyle.
- 3.11 The Government in its Planning Policy Guidance Note 17 on Sport and Recreation attaches great importance to the protection of such greenspaces, recognising that once built on they are likely to be lost to the community forever.
- 3.12 The countryside of the District is one of its greatest assets. Whilst Bradford is a major city, with other substantial towns in the District, two thirds of the area is rural with moorland and attractive valleys surrounding and penetrating into the urban areas. The quality of Bradford's countryside contributes to the overall quality of life in the Bradford District and play's it's part in attracting inward investment, as outlined in the Council's "2020 Vision". The Council shares the Countryside Agency's vision for the countryside, as set out in the Agency's strategy, "Towards tomorrow's countryside" (2001)
- 3.13 The Council received clear advice from the Inspector who considered the objections to the first UDP to review the Green Belt and the emerging new Regional Planning Guidance offers advice on circumstances where a local review may be necessary. The Council has conducted a review and considered whether exceptional circumstances exist which require changes to be made to the extent of the green belt. There is not a general need to remove land from the green belt to meet the development needs of the District. There is in a limited number of circumstances need to revise the boundary where it is not clearly defined on the ground and where previous decisions taken in exceptional circumstances have made the green belt boundary obsolete. Details of individual changes can be found in the Proposals Reports

UDP2

THE PLAN DEFINES AREAS OF RESTRAINT FROM DEVELOPMENT IN THE COUNTRYSIDE AND THE BUILT UP AREAS THROUGH

- (1) THE GENERAL EXTENT OF THE GREEN BELT AND EXCEPTIONALLY MAKING A SIGNIFICANT ADDITION TO THE GREEN BELT THE NORTH OF ADDINGHAM TO CONTROL THE EXTENT OF THE VILLAGE; AND**
- (2) THE COUNTRYSIDE, TOGETHER WITH URBAN AND VILLAGE GREENSPACES, WHICH HAVE AN AMENITY, RECREATIONAL OR NATURE CONSERVATION VALUE TO THE COMMUNITY WHICH WILL BE PROTECTED AND ENHANCED FOR THEIR OWN SAKES AND FOR PUBLIC ENJOYMENT.**

- 3.14 These principals are carried through into part 2 of the Plan in the topic areas covering Open Land in Settlements, Development in the Green Belt and the Natural Environment.

The Quality Of The Built And Natural Environment Including Sustainable Design.

- 3.15 In addition to the strategic considerations of sustainable development set out above there are matters of equal importance which affect individual developments. In particular design as it affects matters such as resource consumption, impacts on the districts extensive built and natural heritage and the value the Districts 2020 Vision attaches to the quality of the local environment. The government places significant value on these matters and stresses their importance to the Development Plan in PPGs 9,15 and 16. However the Plan can only deal with some aspects of the built and natural heritage as other legislation plays an important role in promoting and safeguarding these assets.

UDP3

NEW DEVELOPMENT WILL NEED TO ENSURE THAT THE QUALITY OF THE BUILT AND NATURAL ENVIRONMENT IS MAINTAINED AND WHERE PRACTICAL IMPROVED. IN PARTICULAR DEVELOPMENT SHOULD:

- (1) PROMOTE SUSTAINABLE DESIGN AND ENSHRINE THE PRINCIPLES OF GOOD URBAN DESIGN**
- (2) NOT ADVERSELY AFFECT ANY HERITAGE ASSETS OR ENVIRONMENTAL RESOURCES.**
- (3) NOT HARM THE CHARACTER OR QUALITY OF THE WIDER ENVIRONMENT.**

- 3.16 These principals are carried through into part 2 of the Plan largely in the topic areas of Design, Built Heritage and the Natural Environment. Though matters concerning the character and the quality of the local environment are also found in the Urban Renaissance and Pollution Hazards and Waste topics.

Promoting Economic Regeneration

- 3.17 One of the key aims for the district, outlined in the 2020 Vision document launched by Bradford Congress in April 2000, is to achieve a prosperous, well diversified local economy with particular strengths in the new technology, financial services and cultural industries. The Unitary Development Plan can help achieve this objective by providing development land in attractive locations, particularly for fast growing local companies on which the future prosperity of the district depends.

UDP4

THE PLAN PROMOTES ECONOMIC REGENERATION AND CREATES CONDITIONS TO SUPPORT ECONOMIC GROWTH AND EMPLOYMENT OPPORTUNITIES FOR ALL THROUGH THE PROVISION OF LAND AND APPROPRIATE REUSE OF BUILDINGS PREDOMINANTLY WITHIN THE EXISTING BUILT UP AREAS.

- 3.18 These principals are carried through into part 2 of the Plan in the topics areas of Economy and Employment and Centres.

Meeting the Needs of Communities

- 3.19 A home and adequate community provision are vital to the well being of the District. The provision of homes is the largest consumer of land for development in the district.

Homes

- 3.20 The government advises in PPG3 that the development plan should look to Regional Planning Guidance when considering the scale of provision of homes. The Secretary of States approved guidance, RPG12 Regional Planning Guidance for Yorkshire and Humberside, was published in 1996 but is now clearly out of date with respect to housing, and at the time of writing is in review. Draft RPG was published in October 1999. The Panels report into the Examination in Public was published in October 2000 and the Secretary of State published his response to this in March 2001. As the Council approved the content of this draft of the Plan in March 2001, this first deposit draft of the Plan is based on the draft RPG and the subsequent Panel report but not the response to it by the Secretary of State.
- 3.21 The strategy in draft RPG for the provision of housing, which was endorsed by the Panel report, is based on the 1996 DETR household projections and decisions of the Regional Planning Forum. These were to vary the allocation of housing provision to Strategic Planning Areas based on policy considerations, including the potential to accommodate development on brownfield sites and the regeneration priorities in the region.
- 3.22 Policy H1a) of draft RPG states that “ Development Plans will allow for the possibility of needs arising for additional housing in each strategic planning area up to the amounts in Table H1”. The target for Bradford District in Table H1 is an additional 25000 houses between 1998 and 2016. This equates to approximately 1400 houses per year over the RPG period.
- 3.23 The time period for proposals in the Plan is to 2014. The strategy and protection of the green belt must look well beyond the end of the plan. Applying a period of five years to the RPG period provides this and takes consideration of the green belt to 2021. If the annual draft RPG requirement was to continue, a further 7000 homes could be required taking the requirement to 32000 additional homes. The supply of housing in the replacement Plan has been considered in this light.

3.24 The most recent monitoring of land available for housing development at 1st April 2000 identified the following (to the nearest 100 homes) on sites larger than 0.4 ha:

New homes built since 1 st April 1998	2200
Sites under construction	1300
Sites with permission, specific yield	600
Land with planning permission (estimated homes)	1100
Land allocated for housing but not committed (0.4ha)	11700
Land with expired planning permission (0.4ha)	3400

3.25 Homes are provided also on sites smaller than (0.1ha) known as 'infill' sites, by the conversion of non-residential buildings and through the development of larger sites not identified in the current Plan known as 'windfall' sites. If the trend for each of these continued throughout the plan period, they would add the following additional supply:

Infill	2000
Conversions	2800
Windfall	2000

3.26 In the preparation of the replacement Plan some new sites have been identified from former school sites, vacant land and sites proposed to be reallocated in the replacement Plan. Other sites are no longer available for housing development, for example, a number of allotment belts have been withdrawn from prospective disposal for housing as allocated in the current Plan and commitments have been given to return or develop some sites for recreational use. These changes can provide an additional 1000 homes.

3.27 Draft RPG assumes that all new housing land can be developed at an average density of 38 dwellings per hectare (dpha), which is much higher than the 25 dpha historical average achieved across the district.

3.28 An appraisal has been carried out to check the estimate on the basis of alternative densities. At the extremes, an upper density of 60 dpha has been tested against sites that are located within city and town centres and good quality public transport corridors and a lower density of 30 dpha has been identified for sites in the less well located areas and settlements. In order to establish that higher densities are in reality achievable the results from monitoring of new density policies in the replacement Plan will be needed. It is assumed that outside centres and corridors only 50% of development will be at 38dpha, the remainder will be at 30 dpha. Within centres and corridors, 75% of development will be at 38 dpha, but 25% will be at a higher density of 50 dpha. This reduces the amount of development by some 300 houses.

3.29 The projection of the trend elements without any evaluation would be unjustified. Accordingly, the infill trend is considered to be too high as the potential supply of small sites (often large gardens) falls. This trend figure has been discounted to 75% giving 90 dwellings per year.

- 3.30 The potential for conversions is underestimated if a stronger market can be created. A national study by specialist consultants has confirmed that this district has this potential as long as measures can be taken to support the development of stronger market demand. The annual contribution of 175 has been increased to 250.
- 3.31 The windfall trend to date has contained an element of green field sites; these are unlikely to come forward in future owing to preference being given to brownfield development. Alternatively, the promotion of mixed-use areas (Policy UR7) will support the trend figure at the higher level of 175 dwellings per year.
- 3.32 These adjustments change the assumptions in the current Plan. Infill is reduced by 600 homes, conversion activity increases by 1200 homes and windfall increases by 800 homes over the RPG period.
- 3.33 If these revised trends of infill, conversion and windfall were to continue, then an additional 2600 homes would be provided during the five years beyond 2016 to 2021.
- 3.34 Accordingly, the replacement Plan proposes that in effect sufficient supply can be shown to exist to provide for all currently foreseeable housing requirements up to 2021, well beyond the plan period.

TIME PERIOD	COMPONENTS OF SUPPLY	NO. OF HOMES
1998-2016	Current Supply	
	New homes built since 1.4.98	2200
	Sites under construction	1300
	Sites with permission, specific yield	600
	Sites with permission, estimated yield	1100
	Allocations in the current Plan	11700
	Sites with expired permission	3400
1998-2016	Trends from current Plan	
	Infill	2000
	Conversions	2800
	Windfall	2000
1998-2016	Re-appraisal	
	Adjustment from new/reappraised sites	+1000
	Adjustment from density test	-300
	Reductions in infill expectations	-600
	Increased conversion activity	+1200
	Increased windfall activity	+800
1998-2016	Total Supply	29200
2016-2021	Life of Green Belt	
	Infill/conversions/windfall	+2600
2016-2021	Total Supply	31800

- 3.35 On the basis of a sustainability appraisal (Chapter 2, and UDP 1) housing allocations in the Plan have been identified as being either Phase I, or Phase II. The respective time periods being 2000-2009 and 2009-2014.
- 3.36 Phase I of the supply comprises;
- 1300 houses from sites under construction,
600 houses from sites with permission,
6700 houses from existing and new allocations,
4600 houses from infill, conversions and windfall.
- 3.35 Phase II of the supply comprises;
- 4400 houses from existing and new allocations,
2600 houses from infill, conversions and windfall.
- 3.36 Policy H1a) of draft RPG also refers to aspirational brownfield development targets for strategic planning areas. Table H1 sets a figure of 57% for the Bradford District. Analysis of the wider housing supply from 1998 to 2021 suggests that if development takes place in accordance with the expectations of the plan, 44% will be on brownfield land.

Community Provision

- 3.37 Other aspects of community provision are more difficult to plan for as needs are less readily quantified. The provision of schools has largely been resolved by the Councils recent education re-organisation. Therefore the plan provides flexibility to accommodate unforeseen community needs
- 3.38 With regard to recreation provision deficiencies exist, both in parts of the inner urban area, which are particularly densely built up, and in some of the suburban areas. The Council aims to remedy those deficiencies whenever resources and circumstances permit and ensure new areas of deficiency are not created.

UDP5

THE PLAN PROVIDES FOR THE NEEDS OF THE COMMUNITIES IN APPROPRIATE LOCATIONS INCLUDING

- (1) MAKING PROVISION TO ENSURE 1400 HOMES PER YEAR**
- (2) ENSURING THE WIDE RANGING HOUSING NEEDS OF THE COMMUNITY ARE MET**
- (3) ENSURING OTHER SOCIAL PROVISION SUCH AS HEALTH AND EDUCATION IS MADE**
- (4) MAKING PROVISION TO MEET THE DISTRICTS LEISURE AND RECREATION NEEDS INCLUDING PLAYING FIELDS AND CHILDRENS PLAY**

- 3.39 These principals are carried through into part 2 of the Plan in the topics areas of Housing, Community facilities and Open land in Settlements.

Ensuring the Vitality of Centres

- 3.40 Government planning policy in PPG6 places great importance on the strength of city and town centres as a sustainable focus for investment activity and cultural exchange. Maintaining the City and town centres as the main focus of activities is supported by the increasing emphasis on the implementation of Local Agenda 21 and changes in transportation strategy outlined in the Transport White Paper (1998) and the Urban White Paper (2000).
- 3.41 The Urban Task Force Report in July 1999 "*Towards an Urban Renaissance*" reported on a range of initiatives to stimulate the renaissance of towns and cities
- 3.42 These principles are developed in approved Regional Planning Guidance and in its current review. The districts 2020 Vision recognises the importance of centres to the economic health and attractiveness of the District.

UDP6

THE PLAN ENSURES THE CONTINUING VIABILITY AND VITALITY OF CENTRES, ENHANCING OF THEIR ROLE AND RESTRICTING RETAIL AND LEISURE DEVELOPMENTS OUTSIDE CENTRES

- 3.43 These principals are carried through into part 2 of the Plan in the Centres topic

Reducing the Need to Travel

- 3.44 The 1998 Transport White Paper is concerned with integration. This it defines as: integration within and between different types of transport to make connections work; between transport and environment policy for a better environment; with land use planning to reduce the need to travel; and between transport and our policies on education, health and wealth creation so that transport helps make a fairer, more inclusive society.
- 3.45 PPG12 stresses the role of development plans in integrating transport and land use policies. The development plan strategy should underpin the land use issues arising from the implementation of a local transport plan. Development plans should include specific policies and proposals on the overall development of the transport network and related services.
- 3.46 The draft revised PPG13 aims to promote more sustainable transport choices and reduce the need to travel, especially by car. It stresses those strategies in the development plan and the transport plan should complement each other and that consideration of development plan allocations and local transport investment and priorities are closely linked.
- 3.47 Accordingly UDP7 sets out the principle considerations with regard to land use and transport. These principles are also reflected in the location strategy and UDP1 Sustainable patterns of development.

UDP7**THE PLAN SEEKS TO REDUCE THE NEED TO TRAVEL BY:**

- (1) MANAGING THE GROWTH OF TRAFFIC AND MINIMISING ITS IMPACT ON COMMUNITIES AND THE ENVIRONMENT.**
- (2) PROMOTING IMPROVED ACCESSIBILITY THROUGH ENABLING THE USE OF PUBLIC TRANSPORT, CYCLING AND WALKING AND REDUCING THE DEPENDENCY ON THE PRIVATE CAR**

3.48 These principals are carried through into part 2 of the Plan predominantly in the transport and movement topic but also in urban renaissance and other topics where the nature of development raise particular transport and movement issues such as mineral extraction and waste processing.

The Sustainable Use of Natural Resources

3.49 The District has a range of natural resources and this policy sets out the principals which are applied in the range of policies which concern natural resources.

3.50 Minerals are important national resources providing essential raw materials for building and industrial purposes. Minerals can only be worked where they occur and mining operations, because of their scale, duration and location, often have a greater impact on the environment than other forms of development.

3.51 The Council is the Minerals Planning Authority (MPA) for the Bradford district. The MPA must ensure that there is a sufficient and sustainable supply of minerals to meet the demands of the construction industry for the life of the UDP whilst at the same time protecting the environment from damaging development. Government guidance on meeting these objectives is set out in Minerals Policy Guidance notes (MPG), some advice is also provided by Regional Planning Guidance 12 "Regional Planning Guidance for Yorkshire and Humberside" 1996 (RPG12) and the draft RPG12 "Regional Planning Guidance for Yorkshire and Humberside" 1999.

3.52 Renewable electricity generation technologies which make use of the Districts natural resources, produce no or result in lower greenhouse gas emissions, can make an important contribution to meeting requirements for future greenhouse gas reduction commitments. Locally the Council supports the exploitation of renewable energy in addressing climate change, and has included a commitment to promote them in Bradford's '2020 Vision'

3.53 Government guidance on renewable energy is set out in Planning Policy Guidance note 22. This emphasises the importance of balancing the need for the generation of energy from renewable sources with the impact of a proposed development on the local environment.

- 3.54 The quality of the water environment another significant natural resource is a major concern of the Council and within the planning powers available it will seek to protect and where possible improve the quality of the District's rivers, streams, groundwater, lakes and ponds etc. Development has the potential to cause major water pollution problems.

UDP8

THE PLAN ENCOURAGES THE SUSTAINABLE AND EFFICIENT USE OF THE DISTRICT'S NATURAL RESOURCES AND SEEKS TO ENCOURAGE THE POTENTIAL OF RENEWABLE ENERGY

- 3.55 These principals are carried through into part 2 of the Plan in the topic of Natural resources.

Management of Pollution Hazards and Waste

- 3.56 Concern over the quality of the environment has increased significantly in recent years and has become a key quality of life issue. In particular the need to improve the management of waste and improve the quality of our air.
- 3.57 A clean and healthy environment is a key element of sustainability. The Council is concerned to ensure that developments, due to their nature or location, do not endanger public health and safety, or cause a significant nuisance to the public.
- 3.58 The land use implications of the management of Waste is the responsibility of Bradford Council as the waste planning authority (WPA) There has been a dramatic change in waste management policy over the last few years, which has culminated in new European Directives, Government policy and guidance Waste Strategy 2000 and PPG 10 set out the governments requirements for planning authorities. Authorities must also consider both the Regional waste Management Plan and the Council's own Municipal Waste Management Strategy. Both these documents are currently under production.

UDP9

THE PLAN CONTRIBUTES TO THE MANAGEMENT OF POLLUTION, HAZARDS AND WASTE THROUGH RELEVANT CONTROL MEASURES RISK MINIMISATION AND THE ENCOURAGEMENT OF REUSE AND RECYCLING.

- 3.59 These principals are carried through into part 2 of the Plan in the topic on Pollution Hazards and Waste.

Location Strategy

- 3.60 The second element of the development strategy of the Plan is the location strategy. This is guided by national planning guidance, regional planning guidance and local policy considerations.

National Policy Context

- 3.61 The national policy context for the location strategy is drawn from Planning policy guidance notes in particular PPG12 Development Plans, PPG3 Housing and PPG13 Transport (and the draft revised PPG13 which was about to be finalised at the time of writing). There is little to be gained from repeating the content of the relevant PPG's which has guided this part of the plan but to aid the reader attention is drawn to the following paragraphs.

PPG12 paragraphs 3.8, 5.4 and 5.6
PPG13 (draft) paragraphs 5,10 and12
PPG3 paragraphs 21, 28, 30, 65, 67, 69 and 70

Regional Policy Context

Approved Regional Planning Guidance

- 3.62 The first regional guidance for Yorkshire and the Humber published in March 1996 (RPG12) introduced principles in accordance with the approach of the UK Sustainable Development Strategy. To help achieve these broad objectives development was to be closely related to the existing settlement pattern (in areas of high public transport accessibility) and encouraged to help the regeneration of the most deprived areas. Significant incremental expansion of settlements likely to result in an increase in commuting by car to urban centres was to be avoided
- 3.63 Draft new Regional Planning Guidance is being progressed in parallel with the Plan. At this point the most recent advice is that found in the Panel report as the Secretary of States response to the Panel published on 9th March 2001 has not been able to be taken into account.

New Draft Regional Planning Guidance

- 3.64 Draft new Regional Planning Guidance as deposited in Autumn 1999 includes the following advice on location of development in Section 4 Regional Spatial Strategy Paragraph 4.12.
- 3.65 Where development needs cannot be met within existing urban areas there may be potential for linking new and existing provision for housing employment and transport in 'development corridors'. See Policy P1of the draft RPG for full explanation

Panel Report on the EIP of the Draft Guidance

- 3.66 The Panel has recommended a strengthening of the spatial strategy and have made proposals to revise policy P1 the key policy on location. This sets out a sequential approach.
- Suitable previously developed land
 - Alternative use of allocated land

- Re examination of green belt in order to achieve sustainable patterns of development
 - Development corridors – identifying accessible nodes for development
- 3.67 The Panel also recommend more clarity in the approach to identifying what constitutes an urban area in the sequential approach to housing sites introducing a revised policy H2 which articulates the site search sequence.
- 3.68 In addition the Regional Transport Strategy and Yorkshire Forwards Regional Economic Strategy both published in 1999 have an effect on the UDP. The transport strategy has been integrated into the draft RPG and the investment priorities set out in the economic strategy are reflected in the draft RPG

Local Policy Context

- 3.69 The Council and its partners produced under the auspices of the Bradford Congress a vision for the future of the District “The 2020 Vision” this is an important local consideration in developing the location strategy. It sets out a future for three distinct geographic areas as follows: -
- Bradford’s economic future is inextricably linked to its relationship with Leeds. Plan for greater interaction between Bradford and Leeds
 - There is potential to develop an ‘economic’ and residential corridor in the Aire valley utilising the growth potential of the digital industries
 - The Wharfe valley has a clear role in providing a quality housing location and providing for tourism.
 - The city centre will be the natural focus for Bradford’s cultural life and a desirable place to live and work.

The Local Transport Plan

- 3.70 The Local Transport Plan 2001-2006 (LTP) plays an important role in developing the location strategy and the replacement UDP complements the LTP.
- 3.71 The approved West Yorkshire LTP includes an explanation of its land use context. This draws on draft RPG and the current adopted development plans and looks beyond 2006 the end of the current LTP.
- 3.72 The LTP also provides a yardstick by which to judge access to high quality public transport through its rail network and its high frequency bus network. Access to these is illustrated in the Location Strategy Plan which shows an 800m radii around stations and the high frequency bus corridors which have a 10 minute service between 7am and 6pm
- 3.73 The main features of the distribution of development set out in the LTP as they apply to Bradford district are: -
- the concentration of development within the existing urban area and related to corridors with the potential for improvements to public transport;

- making best use of previously developed land in the urban area;
 - increasing the intensity of development;
 - linking development to improvements in public transport, cycling and walking;
 - preventing sporadic development in locations difficult to serve by public transport;
 - providing for sustainable links between homes, jobs and services.
- 3.74 These key elements represent criteria against which proposals for new development will be considered. This will have the following major consequences for the distribution of development in West Yorkshire:
- the continued consolidation and intensification of the main urban area comprising the built up areas of Leeds, Bradford and the Heavy Woollen District;
 - intensification of functional links between major centres in the urban areas serviced by improved public transport;
 - transport corridors between the main urban centres which are served by rail (such as those between Leeds and Bradford and Leeds and Huddersfield) will be potential locations for new development;
 - development proposals on open land outside the urban area in the West Yorkshire Green Belt will be resisted (Other than in exceptional circumstances new development will be within existing settlements);
 - city and town centres of Leeds, Bradford, Huddersfield, Wakefield and Halifax will be the main locations for new retail and leisure development;
- 3.75 Though this part of the LTP has a longer time frame of around 10 years this does not equate to the time frame of the UDP location strategy which looks beyond 2016 and will help shape future LTP's (further detail on the reasons for the timescale of the location strategy is found in the next section).

The Replacement Plan Location Strategy

- 3.76 The aim and objectives of the replacement plan location strategy is derived from the overall aim of the plan and relevant objectives. These are: -
- Devise a Plan which will promote a more Sustainable district
- 3.77 The following specific objectives which are drawn from the overall framework of objectives for the Plan (described in the previous chapter), provide the context for to the location strategy
- To maximise the potential for the built up areas to meet the development needs of the district
 - To provide a location strategy for accommodating development and ensuring environmental protection in a way will provide for good access to services and minimise dependence on the private car.
 - To help ensure pollution and waste are minimised and managed efficiently.

- 3.78 The time scale of the location strategy accords with the overall time scale of the Plan as set out in the introduction to part one. Therefore the Plan looks ahead beyond the end of the time period for RPG in 2016 and has proposals in Part 2 which extend for 10 years from the target adoption date of 2004. Furthermore to satisfactorily address the matter of areas of development restraint the Plan needs to broadly defined these in the location strategy through the general extent of the green belt and in a manner which will ensure the green belt is robust until 2021 and probably beyond. This longer time period also broadly accords with the time period of the 2020 Vision

The location of Development

- 3.79 In order to give certainty the 1998 adopted UDP took as the start point for its location strategy the previous Structure and Local Plans. Similarly the start point for the replacement Plan is the current plan.
- 3.80 Paragraph 2.29 of the previous plan summarises the location strategy of that Plan.
- 3.81 'This Plan will continue to provide for the selective expansion of Bradford and towns in the Aire and Wharfe Valley'.
- (i) Incorporates the development proposals of the Local Plans and adds to them in a way that:
 - (a) capitalises on existing and future infrastructure
 - (b) develops at a scale that ensures commensurate provision of community facilities
 - (ii) Protects open space that has present or future importance to the community, in the inner city and other parts of the District
 - (iii) Causes least disturbance to the green belt
- 3.82 However the emphasis of the location strategy will change because of a range of new factors including revisions to national advice and reductions in the overall need for land for housing. This change will place greater emphasis on accommodating development within the urban areas by encouraging the reuse of brownfield sites and the conversion of buildings whilst constraining the release of greenfield sites, these considerations are reflected in Principle Policies 1 and 2. To ensure these new considerations are applied in a consistent manner and other more local issues are fully considered the commitments in the adopted UDP have been re examined through a sustainability appraisal before being incorporated into the replacement Plan. An explanation of the Sustainability Appraisal can be found in the Vision and objectives topic.

Location of Housing Provision

- 3.83 Guidance in PPG3 suggests a sequential approach to the search for locations for new provision. This sequence is dealt with in the UDP in general terms through the location strategy and in detail through policy to phase the release of sites which is addressed in the housing section and the Proposals Reports.

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- 3.84 PPG3 is unclear regarding the relationship between brownfield and greenfield in the sequential approach to location as it is applied in the Plan. The approach advocated by the RPG Panel report which places location above brownfield/greenfield status in the priority for the release of sites is more logical in the context of wider sustainability considerations than giving greater priority to greenfield/brownfield status.
- 3.85 The location strategy should ensure the most sustainable locations are prioritised for accommodating housing provision. Therefore in the broad provision the following sequence is proposed
- 3.86 The first location in the sequence is sites within the urban area and small rounding off sites. The urban areas defined as Bradford/Shingley/Baildon, the freestanding towns of Keighley, Ilkley, Bingley and the smaller towns of Silsden and Queensbury. (This definition is carried forward from the previous plan)
- 3.87 The second location is urban extensions these are defined as –
- On the edge with a minimum of 2 sides exposed to open view/countryside
- relatively significant to the settlement by size
 - environmental factors e.g. land form, topographical features, manmade features egat Sty Lane - one open edge but levels and canal in effect give it three edges.
- 3.88 The third location is nodes in good public transport corridors for example Steeton, Burley and Menston.
- 3.89 Outside the locations set out above small scale provision will be made to serve local needs and help ensure the continuation of local services in villages. At each stage of the sequence brownfields come first therefore urban greenfields come before urban extension brownfields.
- 3.90 A further consideration in the location of housing development is the findings of the examination of urban capacity. This indicates that there is considerable potential in the defined urban areas to accommodate housing through conversions and windfall sites. This potential has been considered in the decisions on the phasing of sites. However there is evidence of market constraints particularly on conversion provision which must temper the extent to which the urban areas will contribute in the early years of the Plan. But as there are significant extant permissions for sites on the edge of the urban areas there should not be any unreasonable constraint on the supply of housing sites.

Location Implications for the Economy

- 3.91 Guidance in draft PPG13 advises that jobs should be located in places highly accessible by public transport, cycling and walking. In general the urban areas defined in the Plan meet these criteria as they are served by high frequency bus routes and/or by rail services. Much of the District's economic activity is found in the Bradford/Shipley/Baildon and the Aire Valley towns and the strategy will seek to reinforce this and improve accessibility by public transport cycling and walking. Additional provision for employment will be made in South Bradford in conjunction with access improvements and in the Aire Valley to build on the good quality access the valley enjoys.

The Role of Centres in Location Strategy

- 3.92 The main centres of Bradford, Shipley, Keighley, Bingley and Ilkley all contain public transport nodes where bus and rail services converge. The larger centres of Bradford Shipley and Keighley all support service employment and opportunities will be identified to make further provision in and adjacent to these centres. To help fulfill the Plan's objective and principal policy for centres increases in housing provision in centres particularly through conversions are encouraged.

Areas of Restraint

- 3.93 Most of the Districts countryside is subject to restraint policy through green belt. The general extent of the green belt in the adopted plan was originally defined in the West Yorkshire Structure Plan as approved in 1980. Detailed boundaries were confirmed in the UDP adopted in 1998 and as was recommended by the Inspector who considered objections to that Plan the extent of the green belt has been reviewed. Further information can be found on the green belt review in the supporting text to principal policy UDP2
- 3.94 This replacement UDP has where exceptional circumstances justify such a change made one significant addition to the general extent of the green belt adding land to the north of Addingham to help prevent encroachment into the countryside. This has been done in recognition of the development pressures brought about by improved communication links between the Wharfe valley and the main centres of Leeds and Bradford.
- 3.95 There are areas of countryside west of Haworth and north of Silsden which lie beyond the outer edge of the green belt these will be subject to countryside restraint policies.
- 3.96 The detailed review of the green belt boundary has led to proposals for a number of changes where exceptional circumstances justify such change. However these do not relate directly to the general location strategy and are considered under Principle Policy UDP2

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- 3.97 Within the main urban areas there are areas of open land which are important to defining the structure and form of these urban areas. These have been reviewed as part of the work on urban capacity and the identified areas will be subject to restraint policies to ensure the integrity of the structure and form of urban areas. Settlements across the district have sites of recreation and ecological value and these will be protected from development.
- 3.98 A Diagram articulating this location strategy accompanies the Proposals Maps.

Performance Framework

- 3.99 Monitoring and alteration of development plans has not been a strong part of the plan-making process in the past. Recent changes in the approach adopted by Government in the national planning regime through promoting 'Plan, Monitor and Manage' rather than 'Predict and Provide' reflects the precautionary principle of sustainable development and Best Value. This is of particular importance to the housing topic and will allow the phasing of housing sites to be reviewed during the life of the Plan should this be required. National Best Value performance indicators now exist that require monitoring of the outcomes from development plans.
- 3.100 The replacement Plan includes performance indicators that monitor outcomes from all Principal Policies (new UDP1 to 9). This will be reported through regular monitoring of the replacement Plan and proposals to adjust it through formal Alterations can be made as and when needed. Some of the performance information is collected already and some new arrangements will need to be made; the remainder may be obtained from other agencies. This requirement will help to incorporate the replacement plan within the Council's corporate objectives, community planning frameworks, other strategies and the Council's Best Value Performance Plan. At first deposit the Plan will not include specific targets for each indicator. Data is being collected to establish benchmarks for all indicators and targets will be included in the adopted Plan.

	Principal Policies	Proposed performance indicators.
UDP1	Promoting sustainable development	Departures from the Plan <i>qualification req'd.</i> Overall brownfield/ greenfield split. New development
UDP2	Areas of restraint from development in the countryside and in built-up areas	Loss to development of not previously developed land in the countryside. Loss to development of protected land within the built up areas.
UDP3	Quality of built and natural environment including reference to sustainable design	<i>Sustainable design</i> Total loss of a listed building and/or a building within a conservation area. Loss of designated nature sites to development.
UDP4	Promoting economic regeneration and creating the conditions to support economic success.	Take up of allocated employment land for job creation purposes. Loss of employment opportunities through non-job creating development in employment zones and on allocated sites.
UDP5	Providing land for the needs of the communities including the provision of 1400 homes per year	Affordable homes built. Density achieved on sites. Brownfield greenfield proportion Housing completions including conversions
UDP6	Ensuring the continuing vitality of centres and enhancing their role	Permissions given for out of centre retail and leisure development floor area

UDP7	Managing the growth of traffic and minimising its impact on communities	<p>Proportion of new homes and conversions completed within areas well served by public transport.</p> <p>Travel mode split for all journeys.</p>
UDP8	Use of natural resources	<p>Volume of newly won minerals</p> <p>Volume of recycled minerals</p> <p>Generating capacity of additional renewable energy schemes permitted.</p> <p>Development approved on floodplains without compensatory washland.</p>
UDP9	Management of pollution, hazards and waste	<p>Amount of waste going to landfill: recycled/inert/biodegradable.</p>