Local Development Framework for Bradford

# Core Strategy Development Plan Document Statement of Pre-Submission Consultation

**Issues and Options Stage** (Regulation 25)

August 2011





# Foreword

This Statement of Pre-Submission Consultation report relates to the extensive public consultations that were carried out at the Issues and Options (2007) and Further Issues and Options Stage (2008-9) of the Core Strategy Development Plan Document (DPD) and the responses gained as a result.

The Issues and Options stage was the first stage in the process of developing the Core Strategy. Its purpose is to involve interested parties in identifying the key issues and options which the new plan will need to address.

# **Further Information**

For more information about the Core Strategy or the wider Local Development Framework (LDF), please visit our website at:

www.bradford.gov.uk/LDF.

# **Contact Us**

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#### 1.0 INTRODUCTION & BACKGROUND

- 1.1 The Planning and Compulsory Purchase Act 2004 brought about a major change to the British planning system, in particular to planning policy and how development plans are to be prepared. This means that the adopted Replacement Unitary Development Plan (RUDP) (2005) will, in time, be replaced by the Local Development Framework (LDF). When preparing documents which will form part of the LDF, the Council must carry out public consultation and engage with local communities and stakeholders. The minimum requirements which all authorities must achieve are set out within the planning regulations.
- 1.2 Authorities are also required to prepare and public a Statement of Community Involvement (SCI) which explains when and how any public consultations will take place, who will be consulted and what will be done to engage with the community at each stage and also within planning applications. The Council is fully committed to community engagement in the delivery of local services and functions. The SCI for Bradford was adopted by the Council on 8<sup>th</sup> July 2008.
- 1.3 When submitting Local Development Document (LDDs) to the Secretary of State for approval, local authorities must include a Statement of Pre-Submission Consultation to demonstrate how consultation has been undertaken during the plan preparation process and how it has complied with the minimum requirements of the regulations and the Council's own SCI.

#### Purpose of this document

- 1.4 This Statement of Pre-Submission Consultation report sets out how Bradford Council has involved the community and key stakeholders in the preparation of the Core Strategy Development Plan Document (DPD) at the Issues and Options stage. It sets out what was done to consult the different organisations, agencies, and residents of the District, how this met the requirements of the regulations and how it complies with the Statement of Community Involvement. It also describes how the results of the consultations have been taken into account in the stages of preparing the next stage of the plan the Further Engagement Draft report.
- 1.5 This Statement of Pre-Submission Consultation has been prepared in accordance with Regulation 28(1) of the Town and Country Planning (Local Development) (England) Regulations 2004 which requires the submission the submission of a DPD to be accompanied by a statement pursuant to Regulation 25(1), setting out the following:

- a. Those bodies consulted;
- b. How those bodies were consulted;
- c. A summary of the main issues raised;
- d. How the issues have been addressed in the DPD.
- 1.6 In addition, Regulation 28(1) also requires a statement regarding all the representations which were made under Regulation 27(2) in respect of the Issues and Options stage. This statement sets out the following:
  - a. The number of representations made;
  - b. A summary of the main issues raised in the representations;
  - c. How the main issues have been addressed in the DPD.
- 1.7 This statement will set out the nature of the consultation which has taken place at the Issues and Options stage of the Core Strategy in order to fulfill the requirements as set out above. The following informal consultation stages have taken place for the Core Strategy DPD:
  - Issues and Options & Initial Sustainability Appraisal February 2007
  - Further Issues and Options & Initial Sustainability Appraisal January 2008

BACKGROUND TO THE LOCAL DEVELOPMENT FRAMEWORK (LDF)

#### What is a Local Development Framework (LDF)?

- 1.8 Development in the District is currently controlled by the Replacement Unitary Development Plan (rUDP), adopted in October 2005.
- 1.9 The Planning and Compulsory Purchase Act 2004 required local authorities to replace their current development plans with a new type of plan called a Local Development Framework (LDF). The Local Development Scheme (LDS) provides a starting point for the local community and the stakeholders to find out what planning policies and proposals (Local Development Documents) the Council intends to produce as part of the LDF.

#### **Core Strategy Development Plan Document**

1.10 The Core Strategy Development Plan Document (DPD) is the document that will show broad areas for growth and restraint, and will set out the role that different areas of the District will have until 2026. It will set the long term spatial vision for the District and strategic policies to deliver the vision. For further information on the Core Strategy, please see Bradford Council's Leaflet Number 2: 'The Guide to the Core Strategy'.

- 1.11 There are a number of stages within the preparation of the Core Strategy, these are highlighted below<sup>1</sup>. Within these, there are key three consultation stages during its production, the first being the 'Issues and Options' stage; then the Further Engagement Draft followed by the Submission stage prior to an Examination and adoption of the document.
  - 1 Pre-production scoping and evidence gathering
  - 2 Consultation on Issues and Options
  - 3 Consultation on Further Engagement Draft
  - 4 Consultation on Submission Draft Core Strategy
  - 5 Submission to Secretary of State
  - 6 Examination
  - 7 Adoption following a binding Inspectors report.
- 1.12 Following consultation at the Issues and Options stage in 2007, Bradford Council decided to undertake further consultation at this stage to teeth out further issues faced by the District and several options. These consultation periods have been termed the Further Issues and Options stage. The details and outcomes of these consultations are outlined within this report.

#### Statement of Community Involvement (SCI)

- 1.13 The Statement of Community Involvement (SCI) sets out how the Council intends to engage the community in producing Local Development Documents that make up the Local Development Framework, and in the consideration of planning applications. The SCI is itself a Local Development Document that is the subject of a Public Examination by an independent Inspector. Once adopted, all other LDD's will have to comply with the requirements for community involvement set out in the adopted SCI. The SCI was adopted by the Council on 8<sup>th</sup> July 2008.
- 1.14 This report will set out how the Council has consulted the public and stakeholders at the Issues and Options Stage of the Core Strategy, in accordance with the Statement of Community Involvement.

<sup>&</sup>lt;sup>1</sup> Town and County Planning (Local Development) (England) Regulations 2004

#### Yorkshire Planning Aid

- 1.15 The SCI identified Yorkshire Planning Aid as a means by which a partnership can be formed to increase local community involvement in the preparation of the Council's development plans and policies.
- 1.16 Yorkshire Planning Aid provide free, independent and professional town planning advice and support to communities, individuals and groups within the Yorkshire and Humber region who cannot afford professional fees. Yorkshire Planning Aid is part of a network of nine Planning Aid services throughout the country, all of which are part of the Royal Town Planning Institute (RTPI), a Registered Charity. Services operate through small staff teams and network of professional qualified volunteers. Their work complements the work of local planning authorities, but is wholly independent of them. Planning Aid helps to meet one of the key aims of the government's planning reform agenda, which is to place community engagement at the heart of the planning system.
- 1.17 Bradford Council has been working in partnership with Yorkshire Planning Aid, both for the Core Strategy and the Bradford City Centre Area Action Plan (BCCAAP) to seek to engage with disadvantaged communities and with groups which represent or work with people who need support and guidance in order to get involved with the planning system, for example young people, people with disabilities, or people from ethnic minority communities. These consultations are highlighted in the relevant sections within in this report.

#### **Planning Aid England 2011**

- 1.18 Following Government review of the Royal Town Planning Institute's (RTPI) Planning Aid funding in early 2011, the charity was awarded £1millon to continue their valuable community planning work, albeit with a reduced budget. As a result of the reduced budget the organisation has been restructured. Yorkshire Planning Aid no longer exists; instead the organisation is known as Planning Aid England.
- 1.19 Bradford Council will continue to work with Planning Aid England as it progresses with work on the Local Development Framework.

# 2.0 ISSUES & OPTIONS CONSULTATION – FEBRUARY 2007

#### 2.1 Introduction

- 2.1.1 In line with the requirements of the new planning system, Bradford Council undertook a six week public consultation on the Issues and Options stage from 16<sup>th</sup> February until 30<sup>th</sup> March 2007.
- 2.1.2 At this stage it was the intention of the Council to seek the views of key stakeholders, community groups and residents with regards to the issues faced by the district and how these could potentially be addressed through the Core Strategy. It was the decision of the Council to produce a series of eight Topic Papers relating to key areas and topics to be addressed within the document. This was to enable focused discussions and comments to be made during the consultation process.
- 2.1.3 Bradford Council's Executive Committee gave approval for public consultation on the Core Strategy Issues and Options documents on the 6<sup>th</sup> February 2007.

#### **Consultation Documents**

- 2.1.4 A series of eight Topic Papers were produced which focused on key topic areas in order to stimulate discussions surrounding the key issues, constraints and opportunities for development within the Bradford District. The following Topic Papers were produced and made available for consultation:
  - Engagement Plan
  - Topic Paper 1: Introduction & Background
  - Topic Paper 2: Spatial Vision & Strategy
  - Topic Paper 3: Meeting the Need for Dwellings within the District
  - Topic Paper 4: Economy & Jobs
  - Topic Paper 5: Transport & Accessibility
  - Topic Paper 6: Community Facilities
  - Topic Paper 7: Environment
  - Topic Paper 8: Waste Management
  - Initial Sustainability Appraisal

#### 2.2 Who was consulted?

2.2.1 In total 401 stakeholders, members, groups and individuals were invited to make comments to the consultation documents outlined above. A full list of all those contacted can be found in Appendix 1.

#### 2.3 How the public and other stakeholders were consulted

- 2.3.1 The Council used a number of different methods of community consultation and engagement which aimed to reach the different groups within the community. The ranges of methods used are outlined below:
- 2.3.2 Prior to the public consultation a series of **Member Briefings** were arranged with each of the political parties within the Council to outline the nature of the LDF for Bradford, explain what the Core Strategy is and to introduce the consultation documents prior to an Executive Meeting.

Date	Time	Party	Venue
29 <sup>th</sup> January 2007	15.30 – 17.00	Conservative	CBMDC, Jacobs Well
29 <sup>th</sup> January 2007	17.00 – 17.45	Green	CBMDC, Jacobs Well
29 <sup>th</sup> January 2007	18.00 – 18.30	Liberal Democrats	CBMDC, Jacobs Well
1 <sup>st</sup> February 2007	17.00 – 18.00	Labour	CBMDC, City Hall

2.3.3 **News Articles** were featured in the following local newspapers to advertise the consultation and the consultation events to residents across the District. A selection of these articles can be found in Appendix 2 – see paragraph 2.5.

Date Newspaper		Article Title
1 <sup>st</sup> February 2007 Telegraph and Argus		Help us plan the future of the district
6 <sup>th</sup> February 2007	Craven Herald & Pioneer	Fight for the land, public urged
8 <sup>th</sup> February 2007	Ilkley Gazette	Save green belt by praising it
8 <sup>th</sup> February 2007	Craven Herald & Pioneer	Development blueprint
Issue 2: March 2007	Community Pride	Planning for the future

- 2.3.4 On 15<sup>th</sup> February 2007, **consultation letters** were sent out via post to over 400 individuals, community groups, developers, agents and infrastructure providers in line with the Statement of Community Involvement, notifying them of the consultation, how to view the documents and inviting them to make comments. Appendix 1 provides a list of all those who were directly consulted at this stage.
- 2.3.5 Copies of the consultation documents were placed for viewing at the following **deposit locations:** 
  - At Planning Offices in Bradford, Shipley, Keighley and Ilkley.
  - In the main local libraries in Bradford, Shipley, Bingley, Keighley and Ilkley.
- 2.3.6 The **Council's LDF website** was used to facilitate communication of the consultation. Consultation documents were made available to view and download throughout the process and details of the events were advertised. Details of how people could comment on the consultation documents were also provided.
- 2.3.7 Topic Workshops were organised with key stakeholders and providers to discuss the key issues for Bradford and how they should be addressed during the preparation of the Core Strategy. These events included an introductory PowerPoint presentation which explained the planning system, the Core Strategy and the topic based issues. This was followed by a series of workshop discussions whereby participants were split into groups to discuss the issues for Bradford. These were held as follows:

Date	Time	Topic Workshop	Venue
22 <sup>nd</sup> March 2007	9.30 - 12.30	Housing	Velocity Centre, Bradford
30 <sup>th</sup> March 2007	9.30 - 12.30	Waste	Velocity Centre, Bradford
28 <sup>th</sup> June 2007	9.30 - 12.30	Transport	Velocity Centre, Bradford

2.3.8 Area Stakeholder Conferences were organised to allow stakeholders, community groups and residents to understand the LDF and Core Strategy process. These events included an introductory PowerPoint presentation which explained the planning system, the Core Strategy and the event itself. This was followed by a series of workshop discussions whereby participants were split into groups to discuss the issues facing the District. These events were advertised in the local media and on the Council's LDF website. These were held as follows:

Date	Time	Area Conference	Venue
19 <sup>th</sup> May 2007	9.00 - 13.00	Airedale	Victoria Hall, Saltaire
23 <sup>rd</sup> May 2007	9.00 - 13.00	Bradford	Thornbury Centre
16 <sup>th</sup> June 2007	9.00 - 13.00	llkley	Riddings Hall, Ilkley
23 <sup>rd</sup> June 2007	9.00 - 13.00	Bradford	Carlisle Business Centre

2.3.9 Members of the LDF Group attended a series of **partnership meetings** prior to the consultation period in order to raise the profile of the Core Strategy and the wider LDF and gain a fuller understanding of the needs and aspirations of those key partners and stakeholders through discussions. These were held as follows:

Date	Time	Partnership	Venue
22 <sup>nd</sup> September 2006		CSDG	
16 <sup>th</sup> November 2006	9.30 – 11.30	Housing	CBMDC, Jacobs Well, Bradford
9 <sup>th</sup> February 2007	9.00 – 12.30	Bradford Housing Partnership	CBMDC, Committee Room 1, City Hall
9 <sup>th</sup> February 2007	9.00 - 13.00	Environment Partnership	CBMDC, Olicana House, Bradford
15 <sup>th</sup> February 2007	14.00 – 16.30	Environment Partnership	City Hall, Bradford
15 <sup>th</sup> February 2007	14.00 – 16.00	Strategic Health Improvement	Primary Care Trust, Douglas Mill, Bradford
2 <sup>nd</sup> March 2007		Bradford Centre Regeneration Board	Bradford Centre Regeneration
5 <sup>th</sup> March 2007	18.00 – 20.30	NSIP - Exhibition	Great Victoria Hotel, Bradford
13 <sup>th</sup> March 2007	10.00	Bradford Housing Association Liaison Group (BHALG)	CBMDC, Olicana House, Bradford
14 <sup>th</sup> March 2007	13.00 – 17.00	Children & Young People Partnership	CBMDC, Olicana House, Bradford
22 <sup>nd</sup> March 2007		Economic Partnership	
5 <sup>th</sup> April 2007	14.00 – 16.30	Mobility Planning Group	CBMDC, St Peter's House, Bradford

#### 2.4 Yorkshire Planning Aid Consultations

2.4.1 Yorkshire Planning Aid targeted consultation at this stage within the Black and Minority Ethnic (BME) Communities and organised the following events during the Issues and Options consultation:

Date	Time	Group / Organisation	Venue
13 <sup>th</sup> June 2007	18.00 - 20.00	BME Community	Kidmat Centre, Bradford
18 <sup>th</sup> June 2007	13.00 - 15.00	BME Community	Highfield Centre, Keighley

#### 2.5 Response to the Issues and Options Consultation

- 2.5.1 The majority of the responses made at this consultation stage were done through comments made at the workshop events. In total 219 people attended the various consultation workshop events. A total of 66 written representations were submitted at this stage; these were primarily from statutory bodies.
- 2.5.2 Appendix 2 provides a summary of the key issues which were received from the following consultation methods undertaken:
  - Area Stakeholder Conferences
  - Topic Workshops
  - Yorkshire Planning Aid Events
- 2.5.3 A summary of the main issues gained from the written responses to the Issues and Options consultation and the Council's response can be found in Appendix 3.
- 2.5.4 A full and detailed record of the following methods of engagement (as set out below) is provided within separate 'Consultation Event Log' documents which supplements this Statement of Consultation. A list of all these documents can be found in Appendix 5. These are available to view and download from the Council's website.
  - Summary of Representations
  - Area Stakeholder Conferences
  - Topic Workshops
  - Yorkshire Planning Aid Workshops

#### 2.6 Initial Sustainability Appraisal

- 2.6.1 The Planning and Compulsory Purchase Act (2004) requires a Sustainability Appraisal (SA) to be carried out on Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Environmental Assessment of Plans and programmes, Regulations (2004), which compliments the EU Strategic Environmental Assessment (SEA) Directive, requires an SEA of a wide range of plans including Local Development Frameworks. SEA and SA are very closely linked and are being undertaken as a single process in the preparation of the Core Strategy DPD.
- 2.6.2 The first stage of the SA and SEA process was the production of a Draft Scoping Report in February 2007. This set out the scope and framework for the later Sustainability Appraisal Reports, determined through a comprehensive review of planning documents and baseline information for Bradford and sets out a series of draft sustainability appraisal objectives. Consultation on this Scoping Report was undertaken for a 6 week period in February to April 2007.
- 2.6.3 Following the production of the Sustainability Appraisal Scoping Report an Initial Sustainability Appraisal of the Issues and Options Topic Papers was carried out. The Initial Sustainability Appraisal was published in February 2007 to accompany the Issues and Options consultation documents. A total of 2 comments were received in relation to this document. The main points arising were:
  - Concerns that the Historic Environment not featured within the SA.
  - Suggested additional objective relating to 'support and collaboration between educational establishments, business and industry' in order to achieve a more balanced approach to economic impacts.

#### 3.0 FURTHER ISSUES & OPTIONS CONSULTATION – JANUARY 2008

#### 3.1 Introduction

- 3.1.1 In September 2007 the Yorkshire and Humber Assembly published revised housing figures for the Yorkshire & Humber Region within the Regional Spatial Strategy (RSS). The revised housing figures meant that Bradford Council would be required to supply enough land for 54,000 homes by 2026; this equates to an annual rate of 2,700 dwellings, an increase of 1,140 dwellings per year. This had major implications for the spatial development of housing within the Bradford District.
- 3.1.2 As a direct response to the revision of the RSS, the Council made the decision to undertake further consultation at the Issues and Options stage to outline and discuss possible options for the locations of housing development across the District. Four spatial options of the location development were devised. Diagrams showed the distribution of the 50,000 dwellings that need to be provided by 2026, and the location of employment uses.
- 3.1.3 Bradford Council's Executive Committee gave approval for public consultation on the Core Strategy Further Issues and Options documents on the 18<sup>th</sup> December 2007. The six week consultation period ran from 15<sup>th</sup> January until 20<sup>th</sup> March 2008.

#### **Consultation Documents**

- 3.1.4 The consultation sought comments on three documents:
  - Spatial Vision and Strategy
    - o Including a summary leaflet 'Your District in 2026'
  - Initial Sustainability Appraisal
  - Draft Settlement Study
- 3.1.5 This consultation stage placed emphasis on the Spatial Vision and Strategy document, which provided four options for the broad location of housing development within the Bradford District.

#### 3.2 Who was consulted?

3.2.1 This consultation sought views from the public, landowners, community groups, infrastructure providers and other interested parties. All those involved at the initial Issues and Options stage were notified of this consultation and invited to comment at this stage. In total over 1,600 people were notified about this consultation. Appendix 5 provides a full list of bodies and organisations that were invited to make representations at the Further Issues and Options stage.

3.2.2 In addition to the consultees on the LDF database, the LDF Group utilised the Council's Neighbourhood Development Services to target the wider community. Due to confidentially issues, a brief summary of who were contacted is provided in Appendix 5.

#### 3.3 How the public and other stakeholders were consulted

- 3.3.1 The Council used a number of different methods of community consultation and engagement which aimed to reach the different groups within the community. The ranges of methods used are outlined below:
- 3.3.2 Prior to the public consultation a series of **Member Briefings** were arranged with each of the political parties to report back on the Issues and Options consultation and to introduce and explain this further consultation prior to an Executive Meeting.
- 3.3.3 **Consultation letters** were sent out via post to over 400 individuals, community groups, developers, agents and infrastructure providers in line with the Statement of Community Involvement (SCI), to notify them of the consultation period and how to view the documents and make comments. A list of consultees can be found in Appendix 5 of this document.
- 3.3.4 Additional letters notifying the districts residents of the consultation on the Further Issues and Options were sent of via the Neighbourhood Forum network on 8<sup>th</sup> February 2008 with the aim of targeting the wider community with an interest in their local areas.
- 3.3.5 **News Articles** were placed in the following local newspapers to advertise the consultation period as well as consultation events to residents across the District:
  - Telegraph and Argus on 29<sup>th</sup> February 2008
  - Keighley News on 13<sup>th</sup> March 2008
  - Ilkley Gazette on 6<sup>th</sup> March 2008

The table overleaf provides a list of all the news articles published surrounding this consultation and also highlighting the issue of housing growth. A selection of these news articles can be found in Appendix 6.

Date	Newspaper	Article Title
10 <sup>th</sup> December 2007	Τ&Α	Council draws up options on how to meet targets – 50,000 homes plans
13 <sup>th</sup> December 2007	T & A	'Homes may have to go on green fields'
17 <sup>th</sup> December 2007	Τ&Α	We'll fight tooth and nail to keep our greenery
10 <sup>th</sup> January 2008	Wharfedale Newspapers	Councils on collision course with Government over Green Belt
28 <sup>th</sup> February 2008	llkley Gazette	Wharfe residents to get say on green belt issue
29 <sup>th</sup> February 2008	T & A	Give you views on planning blueprint
4 <sup>th</sup> March 2008	T & A	Is there more room for 50,000 homes
6 <sup>th</sup> March 2008	llkley Gazette	Residents to get a say as greenbelt is threatened
8 <sup>th</sup> March 2008	Ilkley Gazette	Views are sought on plans for 50,000 more homes
13 <sup>th</sup> March 2008	Keighley News	Views sought on long term future
21 <sup>st</sup> March 2008	Ilkley Gazette	Wharfe planning chief attacks housing strategy meeting
22 <sup>nd</sup> May 2008	T & A	We're on the map at last
31 <sup>st</sup> May 2008	Yorkshire Post	Planners set out vision for region
4 <sup>th</sup> January 2009	Τ&Α	Concerns mount over homes plan
8 <sup>th</sup> January 2009	Τ&Α	Thousands more homes a treat to Districts greenbelt
30 <sup>th</sup> January 2009	Τ&Α	Hands off our green fields, says MP

- 3.3.6 Copies of the consultation documents were placed for viewing at the following **deposit locations:** 
  - At planning offices in Bradford, Shipley, Keighley and Ilkley.
  - In the main libraries in Bradford, Shipley, Bingley, Keighley and Ilkley.
- 3.3.7 The **Council's website** was used to facilitate communication of the consultation. Consultation documents were made available to view and download throughout the process and details of the events were advertised. Details of how people could submit comments via a comment form were made available on the webpage.
- 3.3.8 A **summary leaflet** '*Your District 2026'* was produced in order to provide a brief and informative guide to the four spatial options as presented in the consultation document. These leaflets were used extensively throughout the consultation period, these were:
  - Made available at Planning Offices and libraries for the public to pick up;
  - Placed on the LDF page on the Council's website for downloading;
  - Placed on public display and on notice boards within Council offices;
  - Sent out to members of the public with details of the consultation workshop events;
  - Used to facilitate discussions at the five workshop events;
  - Used to facilitate discussions with school children within the school engagement project.
- 3.3.9 **Issue 1 of the LDF Newsletter -** *Plan-It Bradford* was sent out electronically via email to over 300 contacts from the LDF database in January 2008 with details of the forthcoming consultation period. These newsletters along with further editions are available to view on the Council's website.
- 3.3.10 A series of **partnership meetings** were attended to maintain the profile of the LDF and the Core Strategy further consultation and to discuss in more detail the key issues relating to each partnership. These were held as follows:

Date	Partnership	
24 <sup>th</sup> January 2008	Economic Development Partnership	
26 <sup>th</sup> February 2008	Economic Development Partnership	
6 <sup>th</sup> March 2008	Airedale Partnership	
17 <sup>th</sup> April 2008	Airedale Partnership	

3 <sup>rd</sup> July 2008	Bradford Housing Partnership
14 <sup>th</sup> August 2008	Holme Wood Partnership
27 <sup>th</sup> November 2008	Holme Wood Partnership

3.3.11 A series of **workshop events** were held across the District in March 2008 to raise the profile of both the LDF and the Core Strategy DPD and to gain feedback on the consultation documents. The events took the form of a three hour session that began with a general introduction and a five minute DVD that outlined the four spatial options. Attendees of the event were then divided into groups for workshop sessions, the first workshop sessions focused on discussions surrounding Spatial Option 1 and 2, and the second workshop focused on Spatial Options 3 and 4. The events were held as follows:

Date	Time	Venue
5 <sup>th</sup> March 2008	18.00 - 21.00	Thornton Primary School, Bradford
8 <sup>th</sup> March 2008	10.00 – 13.00	Victoria Hall, Saltaire
12 <sup>th</sup> March 2008	13.00 – 16.00	Thornbury Centre, Bradford
15 <sup>th</sup> March 2008	10.00 - 13.00	Riddings Hall, Ilkley
19 <sup>th</sup> March 2008	18.00 - 21.00	Temple Row Centre, Keighley

3.3.12 A five minute **DVD film / presentation** was produced for use in the workshops to explain the four spatial options for housing growth. This was used within the introductory presentation given at the workshop events outlined above.

#### 3.4 Yorkshire Planning Aid Consultations

- 3.4.1 Following the consultation exercises undertaken at the Issues and Options stage, Yorkshire Planning Aid undertook further consultation to establish the key issues for Bradford and to discuss the four spatial options for future development. The following groups were targeted during this consultation:
  - BME Communities
  - Older people
  - Young people Colleges

3.4.2 In addition to the above groups, Yorkshire Planning Aid in partnership with Bradford Council undertook a pubic consultation exercise in Holme Wood to engage with the community with regards to the proposal to identify the area as a Housing Growth Point, thus extending the existing estate.

#### **BME Communities**

3.4.3 Following on from the previous consultation at the Issues and Options stage with BME Communities, Yorkshire Planning Aid undertook further workshops with these groups to discuss the four spatial options.

Date	Time	Group / Organisation	Venue	
11 <sup>th</sup> April 2008	17.30 – 18.30	Bangladeshi Youth 52 Cornwall Ro		
	17.30 - 18.30	Organisation	Bradford	
16 <sup>th</sup> April 2008	11.00 – 15.00	Grange Interlink Summerville Roa		
10 April 2008	11.00 - 15.00	Grange Internitk	Bradford	
28 <sup>th</sup> April 2008	13.00– 15.00	Keighley Asian Women	Eastwood Centre,	
28 April 2008	13.00- 15.00	Keighley Asian WomenEastwood Centre,and Children's CentreKeighley		
27 <sup>th</sup> May 2008		Mary Seacole Centre	Mary Seacole Centre	

#### **Older people**

3.4.4 One of the hard to reach groups identified within the District was the older population. To ensure this group is fully represented, the Council worked in partnership with Yorkshire Planning Aid, Bradford Older People's Alliance (BOPA) and Age Concern to engage these focus groups which represent the older generations of the Bradford District.

Date	Time	Group / Organisation	Venue
26 <sup>th</sup> March 2008		Bradford Older People's Alliance (BOPA) and Age Concern	Midland Hotel, Bradford

#### Colleges

3.4.5 Another hard to reach group identified was young people. Yorkshire Planning Aid targeted the three main Colleges within the Bradford District, namely Bradford, Shipley and Keighley Colleges in order to seek the views of the young residents.

Date	No of Sessions	College
9 <sup>th</sup> April 2008	2	Keighley College
21 <sup>st</sup> April 2008	1	Keighley College
23 <sup>rd</sup> April 2008	2	Shipley College
29 <sup>th</sup> April 2008	3	Shipley College
6 <sup>th</sup> May 2008	1	Keighley College
14 <sup>th</sup> May 2008	2	Bradford College
22 <sup>nd</sup> May 2008	1	Keighley College

#### Schools

3.4.6 Yorkshire Planning Aid continued to engage with younger people by undertaking further consultations within selected schools. Rhodesway High School has around 76.1% of its pupils from BME backgrounds.

Date	Time	Workshop	Venue
		Year 10 Students –	
3 <sup>rd</sup> July 2009	A total of 6 hours	Interactive Planning	Rhodesway High School,
	of training	Training & Consultation	Bradford
		Workshop	

#### Holme Wood Estate Consultation – November 2008

3.4.7 Within the four spatial options put forward for consultation at this stage, two of the options (options 3 and 4) proposed a potential housing growth point in Holme Wood. Following the Further Issues and Options consultation period, it was realised that this group was not fully represented within the process. As a response to this gap, the Council worked in partnership with Yorkshire Planning Aid to organise a targeted event within this disadvantaged community to seek their views on the proposed housing extension. A summary of the outcomes of this event are provided within Appendix 6 of this document.

- 3.4.8 Prior to the consultation event in November 2008, Neighborhood Forum Meetings, run by the Council's Area Coordinators Office, were attended and were used to raise the profile of the LDF and its challenges, and to set the context for a forthcoming consultation event. These meetings took place within the surrounding areas at:
  - Holme Wood on 20<sup>th</sup> October 2008
  - Tong Village on 12<sup>th</sup> November 2008
  - Tong Street on 19<sup>th</sup> November 2008

A record of the issues raised and the responses given at these meetings is provided within the Holme Wood Consultation Event Log which is supplementary to this report.

Date	Time	Workshop	Venue
29 <sup>th</sup> November 2008	11.00 – 15.00	Holme Wood Estate	TFD Centre, Broadstone Way, Holme Wood

- 3.4.9 In addition, regular contact is maintained with the community through Holme Wood Partnership meetings. These meetings have been recorded under paragraph 3.3.10.
- 3.4.10 The results from the Planning Aid consultations at this stage of consultation can be found within Appendix 6.

# 3.4 Waste Management & Minerals Update Further Issues & Options Consultation - November to December 2008

- 3.5.1 Following consideration of comments received to Topic Paper 8: Waste Management and the Minerals elements of Topic Paper 7: Environment, and to take account of changes to the national and regional policies, the Council felt it necessary to revise these documents to provide more information to assist the stakeholders in discussing the issues and options.
- 3.5.2 On the 14<sup>th</sup> October 2008, Bradford Council's Executive Committee approved the following documents outlined below for public consultation. The consultation period ran from 6<sup>th</sup> November until 12<sup>th</sup> December 2008.

#### **Consultation Documents**

- 3.5.3 Three consultation documents were produced at this stage, these consisted of:-
  - Waste Management Further Issues and Options
  - Initial Sustainability Appraisal of Waste Management Further Issues and Options
  - Topic Paper 7: Environment (Minerals) Update

#### Who was consulted?

3.5.4 For this consultation the Council specifically targeted site operators, waste organisations, local action groups and Council departments for comment. For the minerals element of the consultation, the Council specifically targeted site operators, trade associations and stone merchants with an interest in the area to comment on Topic Paper 7: Environment (Minerals) Update paper. A total of 110 organisations and bodies were invited to comment on these consultation documents.

#### How the public and other stakeholders were consulted

3.5.5 A total of 96 letters were sent to minerals and waste stakeholders across the district and a number of operators and industry bodies of regional or national significance located outside of the district.

#### Further Public Consultation - Minerals Stakeholder Meeting – February 2009

- 3.5.6 Due to the poor response from the consultation in November 2008, in particular from minerals operators and stone merchants, the Minerals and Waste Team undertook additional targeted consultation with the aim to engage with the key minerals industry stakeholders in February 2009.
- 3.5.7 A total of 33 letters were sent to minerals operators, minerals planning agents and stone merchants with an interest in the district inviting them to a meeting (details below) to discuss issues and options for this topic.

Date	Time	Topic Workshop	Venue
4 <sup>th</sup> February 2009	10.00 – 12noon	Minerals Industry Stakeholder Meeting	Design Exchange, Little Germany, Bradford

3.5.8 A summary of responses from these consultations can be viewed in Appendix 10.

#### 3.6 Responses to the Further Issues and Options consultation

- 3.6.1 A total of 317 written representations were received by the end of this consultation, with an additional 107 representations made using the Options Comment Forms handed out at each of the area workshop events. A total of 738 people attended 23 consultation events that were organised by either Bradford Council or Yorkshire Planning Aid during the consultation.
- 3.6.2 A summary of the responses gathered from this Further Issues and Options consultation can be found in Appendix 8. This details the results from the following consultation methods undertaken:
  - Stakeholder Workshops
  - Spatial Options Forms
  - Evaluation of the consultation events
  - Written Representations
  - Yorkshire Planning Aid Events
  - Waste Management and Topic Paper 7: Environment (Minerals) update
  - Minerals Workshop

#### **Consultation Event Logs**

3.6.3 Full details of each consultation event, including the workshops, are provided within separate 'Consultation Event Log' documents which supplement this Statement of Consultation. A list of all these documents can be found in Appendix 11. These are available to view and download from the Council's LDF website.

#### 3.7 Initial Sustainability Appraisal

- 3.7.1 A further Initial Sustainability Appraisal Report was produced at this further stage to assess the potential impact of the four spatial options put forward. This report was published in January 2008 and ran parallel with the Further Issues and Options Consultation.
- 3.7.2 A total of 36 comments were received about this document. The main points arising were:
  - The method is supported.
  - PCT support commitment to achieving high levels of sustainability.
  - The spatial options have not been appraised and findings do not highlight a specific option that satisfies all concerns.
  - SA objectives do not link to the table in Appendix 1.

- There is a lack of a section detailing the plans, programmes and strategies and evidence base documents.
- Consider the re-opening of the railway stations
- Consider a policy review of the takeaways policy
- The Initial SA does not state how biodiversity and landscapes will be preserved and enhanced.
- There is insufficient emphasis on the differences between the spatial options in generating vehicular traffic and CO2 emissions.
- Group together all historic assets within the objectives
- Insufficient planning to safeguard wildlife.
- There should be an sustainability assessment of Ilkley remaining as a Principal Town
- Safeguarded land will reduce the impact on Green Belt releases.
- Funding question not adequately covered.
- A full SA is required.

# 4.0 TRANSITION FROM THE ISSUES AND OPTIONS STAGE TO THE FURTHER ENGAGEMENT DRAFT STAGE (2011)

#### Summary of Responses from the entire Issues and Options consultation

4.1 A summary of the responses from the two Issues and Options consultations are summarised in Appendices 2, 3, 6 and 7 of this report. Consultation reports are available alongside this document which provides the full detailed record of the written representations received and a log of all the consultation events undertaken.

# How these issues been taken into consideration and addressed in the Further Engagement Draft document

- 4.2 The purpose of this first stage of public consultation (Regulation 25) was to identify issues and options for Bradford in order to inform the direction of the Core Strategy DPD. Bradford Council has not responded to each individual representation or comment received at this stage, instead the key issues, opportunities and constraints raised throughout the process have been noted and a brief response from the Council has been provided.
- 4.3 Appendix 3 sets out a summary of the key issues raised by the public at the Issues and Options stage along with Bradford Council's response and what the outcome has been within the Further Engagement Draft report.
- 4.4 Appendix 7 sets out a summary of the key issues raised at the Further Issues and Options stage by the public at this stage along with Bradford Council's response and what the outcome has been within the Further Engagement Draft report.

#### **APPENDIX 1:**

LIST OF ORGANISATIONS AND BODIES CONSULTED UNDER REGULATION 25 – ISSUES AND OPTIONS

#### References in brackets relate to the Statement of Community Involvement (SCI)

#### **Specific Consultation Bodies**

- British Telecom
- English Heritage
- Environment Agency
- Government Office for Yorkshire & The Humber (GOYH)
- Highways Agency, Yorkshire & Humber
- Natural England
- Natural England West Yorkshire Team
- Network Rail
- North West Regional Assembly
- North West Regional Development Agency
- Telewest Communications
- Transco (North of England)
- Yorkshire and Humber Regional Assembly
- Yorkshire Electricity
- Yorkshire Forward
- Yorkshire Water Services Ltd

#### Specific Consultation Bodies (Adjoining Local Planning Authorities)

- Calderdale Metropolitan Borough Council
- Craven District Council
- Harrogate District Council
- Kirklees Metropolitan Council
- Lancashire County Council
- Leeds City Council
- North Yorkshire county Council
- Pendle Borough Council
- Wakefield District Council

## Specific Consultation Bodies (Town and Parish Councils in Bradford District)

- Addingham Parish Council
- Baildon Parish Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council
- Denholme Town Council
- Harden Parish Council
- Haworth, Cross Roads & Stanbury Parish Council

- Ilkley Parish Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Parish Council
- Sandy Lane Parish Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council

#### Specific Consultation Bodies (Town & Parish Councils in Neighbouring Authorities)

- Bradleys Both Parish Council
- Cononley Parish Council
- Cowling Parish Council
- Denton Parish Council
- Draughton Parish Council
- Drighlington Parish Council
- Farnhill Parish Council
- Gildersome Parish Council

- Glusburn Parish Council
- Laneshaw Bridge Parish Council
- Middleton Parish Council
- Nesfield with Langbar Parish Council
- Otley Town Council
- Sutton-in-Craven Parish Council
- Trawden Forest Parish Council
- Wadsworth Parish Council
- Weston Parish Council

#### **General Consultation Bodies**

- A A Planning Services
- A Khawaja Architectural Services
   Limited
- Able All
- Aire Valley Conservation Society
- Aireborough Planning Services
- Airedale General Hospital
- Airedale Partnership
- Al-Farouq Associates
- Allerton Community Association
- Allison And MacRae
- Apperley Bridge Development
   Residents Association
- Asian Business Forum

- Baildon & District Residents
   Association
- Baildon Community Link
- Baildon Parents & Tots Group
- Barton Willmore Planning Partnership
- Ben Bailey Homes
- Ben Rhydding Action Group/Save Us Pub
- Bingley Civic Trust
- Bingley CVS
- Bingley Environmental Transport
   Association
- Bingley Labour Party
- Black Mountain Millennium
   Green/Brunel Community Association

- Bob Jarman
- Bolton Woods Community Association
- Bradford & Airedale Teaching Primary
   Care Trust
- Bradford & District Chamber of Trade
- Bradford & District Coalition of
   Disabled People
- Bradford & Ilkley College
- Bradford & Northern Housing
   Association
- Bradford Botany Group
- Bradford Breakthrough Ltd
- Bradford Business Link
- Bradford Care Consortium Ltd
- Bradford Centre Regeneration
- Bradford Chamber of Commerce & Industry
- Bradford City Farm Association Ltd
- Bradford Civic Society
- Bradford Community Environment
   Project
- Bradford Community Health Trust
- Bradford Community Housing Trust
- Bradford CVS
- Bradford District Chamber of Trade
- Bradford East Area Federation
- Bradford Empowerment Project
- Bradford Hospitals NHS Trust
- Bradford Joint Training Board
- Bradford Night Stop
- Bradford Older People's Alliance
- Bradford Ornithological Group
- Bradford Primary Care Trust
- Bradford Racial Equality Council
- Bradford Retail Action Group
- Bradford South & West Primary Care
   Trust
- Bradford Strategic Health Authority
- Bradford University Environmental Services Department
- Bradford Urban Wildlife Group

- Bradford Vision
- Braithwaite & Guard House
   Community Association
- Mr Bruce Barnes
- Burnett Planning & Development
- Calder Architectural Services Limited
- Campaign For Real Ale
- Carter Jonas
- CB Richard Ellis Ltd
- Chris Thomas Ltd
- Clear Designs
- CNet
- Cottingley Community Association
- Countryside Properties (Northern) Ltd
- CPRE Bradford District
- Craven Design Partnership
- Dacre Son And Hartley
- David Beighton Architects
- David Wilson Homes
- Denholme Residents Action Group
- Depol Associates
- DevPlan UK
- Dial Bradford
- Dialogue Communicating Planning
- DPDS Consulting Group
- Drawtech
- DTZ Pieda Consulting
- Dunlop Haywards Planning
- Eddisons Commercial
- Eldwick Village Society
- Eric Barraclough
- Eric Breare Design Associates
- Fagley Lane Action Committee
- Fagley Tenants & Residents
   Association
- Four Square Drawing Services
- G R Morris Town Planning Consultant
- Garbe Real Estate Ltd
- George Wimpey Northern Yorkshire
   Ltd
- Girlington Action Partnership

- Goldfinch Estates Ltd
- GP Planning And Building Services
- Greenhill Action Group
- Greenway Amenity Group
- GVA Grimley
- Harden Village Society
- Haworth & Oxenhope District
   Bridleways Group
- Hayes Dobson Developers Limited
- Hazel Beck Action Group
- Healthy Heaton Group
- Heaton Woods Trust
- Idle Village Tenants & Residents
- Ilkley CVS
- Ilkley Design Statement
- Indigo Planning Ltd
- J C Redmile
- J O Steel Consulting
- J R Wharton Architect
- Jenny Lane Action Group
- Joseph Rowntree Charitable Trust
- KADAL
- Keighley College
- Keighley Community Transport
- Keighley Local Enterprise Agency
- Keighley Voluntary Services
- Kelly Architectural Design
- Land & Development Practice
- Leith Planning Ltd
- Let Wyke Breathe
- Littman Robeson
- Manningham & Girlington SRB
- Manywells Health Concern Group
- Masts
- Menston Cares
- Menston Community Association
- Morton Village Society
- Mr E Anderson
- Ms Susan Brook
- North Bradford NHS Primary Care
   Trust

- North Bradford Primary Care Trust
- North Country Homes Group Ltd
- Nuttall Yarwood And Partners
- Oakworth Village Society
- Older People's Focus Group
- Oltergraft Planning Services
- Omega Design
- Oxenhope Social Club
- Mr P.M Coote
- PACT
- Parkgate Design
- Paul & Co Wendy Sockett
- Peacock and Smith
- Penny Trepka
- Planet Design Group
- Planning Prospects Ltd
- Plot of Gold Ltd
- Ravenscliffe & Greengates
   Community Forum
- Regen 2000
- Reverend John Nowell
- Robinson Consulting Engineers
- Royds Community Association
- Safer City Bradford & District
- Sanderson & Weatherall
- Shipley College Library
- Shipley CVS
- Silsden Town Action Group
- Spawforth Planning Associates
- St Aidan's Presbytery
- Stockbridge Neighbourhood
   Development Group
- Support Works
- SWG Planning Services
- The City Centre Project
- The Girlington Centre
- The Moravian Manse
- Thorpe Edge Community Forum & RCDP
- Thorpe Edge Community Project
- Transport 2000

- Trident
- Turner Associates
- Vincent and Gorbing Ltd
- Walton & Co
- Webb Seeger Moorhouse Partnership Limited

#### **Other Consultees**

- Addingham Civic Society
- Ancient Monuments Society
- Baildon Civic Society
- Bridleways Association
- British Telecom
- British Waterways
- British Wind Energy Association
- Buildings Consultation Group
- Community Service Volunteers
- Community Support Agency
- Council for British Archaeology
- CPRE West Yorkshire
- DEFRA
- Diocesan Board of Finance
- Director The Theatres Trust
- First Bradford
- Home Builders Federation
- Housing Corporation, NE Region
- Ilkley Civic Society
- Inland Waterways Association
- Learning and Skills Council
- Leeds Friends of the Earth
- Leeds/Bradford International Airport
- Making Space
- Mercury Communications
- Mobile Operators Association
- National Farmers Union
- Npower Renewables
- Planning Inspectorate
- Railtrack Property

- Wilsden Village Society
- Windhill Futures Project
- Woodhouse & Springbank NF
- Working Architects Co-Op Limited
- Wrose Community Centre
- F And W Drawing Services
- Ramblers Association
- Royal Town Planning Institute
- RSPB (Northern England region)
- Society for the Protection of Ancient Buildings
- South Pennines Association
- South Pennines Packhorse Trail Trust
- Sport England
- Telewest Communications
- The Abbeyfield Society
- The British Horse Society
- The Emerson Group
- The Garden History Society
- The Georgian Group
- The Twentieth Century Society
- The Victorian Society
- Visual Disability Services
- West Central Area District Federation
   Tenants & Residents
- West Yorkshire Archaeology Advisory
   Service
- West Yorkshire Ecology
- West Yorkshire Passenger Transport
   Executive & Authority
- West Yorkshire Police Crime
   Prevention
- Yorkshire Dales The Civic Centre
- Yorkshire Riding Centre
- Yorkshire Union of Golf Clubs
- Yorkshire Wildlife Trust

# Other Consultees (List of other Organisations and Groups Consulted that are not identified in the Planning Regulations)

- 90 Bradford Councillors
- 5 Members of Parliament for the Bradford, Keighley and Shipley Constituencies
- Communities of Interest
- Yorkshire Planning Aid
- CBMDC Bradford Access Action
- CBMDC Mobility Planning Group
- CBMDC DDA Task Team

APPENDIX 2: ACTIONS AND EVENTS DURING THE ISSUES AND OPTIONS CONSULTATION – FEBRUARY 2007

2.1 This Appendix provides a summary of the response to the Issues and Options consultation undertaken in 2007. This consultation kick-started a discussion surrounding the issues faced by Bradford and the possible options for its future development. Section 2.0 of this report provides the background information to this consultation and the consultation process undertaken. The outcomes will be set out under the method by which they were collected.

#### Area Stakeholder Conferences

2.2 Four Area Stakeholder Conferences were held across the district in May and June 2007. These events included facilitated exercises and conducted by members of the LDF Team, together with an introductory PowerPoint presentation explaining the role of the LDF and the Core Strategy along with the opportunities and constraints facing the district over the next 15-20 years. Large scale maps with counters were used to aid discussions regarding the location of housing and employment development, and the groups were asked to rank a range of key issues on a chart in terms of their importance for them.



2.3 The events were advertised on the Council's website and within the local press. In total 103 people attended these events.

Date	Time	Area Conference	Venue	No. of Attendees
19 <sup>th</sup> May 2007	9.00 - 13.00	Airedale	Victoria Hall, Saltaire	26
23 <sup>rd</sup> May 2007	9.00 - 13.00	Bradford	Thornbury Centre, Bradford	48
16 <sup>th</sup> June 2007	9.00 - 13.00	llkley	Riddings Hall, Ilkley	16
23 <sup>rd</sup> June 2007	9.00 - 13.00	Bradford	Carlisle Business Centre	13
	1		TOTAL:	103

2.4 The table below provides a summary of the outcomes of the ranked issues undertaken during the workshop events. In total 10 workshop groups carried out this exercise. In general participants ranked all of the issues highly on the chart, however issues such as the role of the City Centre, the Green Belt and climate changed received a mixed and balanced response in comparison of other issues.

Nalikeu ISSues		Low High				No Rank
Ranked Issues		2	3	4	5	
Growing local economy				2	8	
Socially inclusive and vocal communities	1			2	6	1
Choice of housing opportunities				2	8	
Role of the City Centre			1	4	5	
High quality design			2	5	3	
Historic and the natural environment			1	4	5	
Access to public transport				4	6	
Transport infrastructure investment				1	7	1
(connections within and outside district)				1		1
Role of Regeneration			1	3	6	
Role of the Green Belt		1	1	5	3	
Access to leisure and recreation			3	4	2	1
Access to housing, employment,			1	2	5	2
shopping, health, culture and education			I	2	5	2
Climate change			3	4	3	
Sustainable waste management			1	4	4	1
Natural and renewable resources			1	5	3	1
ADDITIONAL CRIERTI	A SUG	GESTE	BY AT	TENDE	ES	
Access to education					3	
Standard of private rented				1		
accommodation						
Relationship with Leeds				1		
Safety (including road safety)			1	2	1	
Green space			1		1	
Minimal road building					1	
Affordable housing					2	
Park and Ride				1		
Centrally located community facilities				1		
Post school education					1	
Bradford's image				1	2	
Health				2		

Additional issues were raised at these events which are outlined below. The Consultation Event Logs for these events outline all of the points made.

#### General

- All the issues need to be tackled as a whole.
- Bradford needs to have a positive relationship with Leeds.

#### Housing

- Homes ought to be both high quality and sustainable
- Housing that meets need rather than just demand.
- Older houses should be regenerated before new ones are built.
- There is not enough social housing in Bradford.
- For vulnerable groups there is a safety issue as well as the issue of access to housing.
- More sheltered housing for the elderly is also needed.
- Housing development along the Canal Road Corridor would be supported, however any new housing developments must incorporate community facilities
- Where large sites are split between developers there needs to be pots of money top bring together S.106 contributions
- There should be limited development in the villages (excluding Thornton and Queensbury) perhaps 200 new homes
- Ilkley should not be protected from development and should accommodate its fair share.
- Existing buildings should be converted, instead of new builds erected.

# Economy & Jobs

- Bradford City Centre should be a focal point for regeneration.
- Improve the relationship between Bradford City Centre and Airedale
- Bradford should not attempt to compete with Leeds.
- Need to reference moving towards a sustainable local economy in the Core Strategy.
- Need more employment opportunities in Wharfedale.
- Employment should be distributed evenly throughout Airedale.
- LDF should encourage new industry and new technology.
- More help should be provided to existing businesses
- Employment opportunities should be available where people live to reduce the need to travel.
- Policies needed to protect existing employment uses from being converted to housing use.

# 2.2 Topic Workshops

A total of three Topic Workshops were held within the district. The Council targeted invites to those with an interest in either housing, transport or waste issues – local groups, social housing providers, developers and agents. Extensive use was made of existing contact networks within the District such as the Bradford Housing Partnership and the Bradford Housing Association Liaison Group (BHALG). In total 80 people attended these events.

Date	Time	Topic Workshop	Venue	No of Attendees
22 <sup>nd</sup> March 2007	9.30 - 12.30	Housing	Velocity Centre, Bradford	30
30 <sup>th</sup> March 2007	9.30 - 12.30	Waste	Velocity Centre, Bradford	20
28 <sup>th</sup> June 2007	9.30 - 12.30	Transport	Velocity Centre, Bradford	30
			TOTAL:	80

2.3 Comments and outcomes from these three topic events can be found in the following pages. Separate Consultation Event Logs contain a comprehensive record of the events. A list of these documents can be found in Appendix 11.

# 2.3.1 Topic workshop - Housing Responses

TOPIC WORKSHOP - HOUSING	
TOPIC	SUMMARY OF COMMENTS
Deliverability	<ul> <li>The authority has over the past few years failed to meet the current annual target of 1390 dwellings.</li> <li>Concerns were raised with how the more ambitious targets likely to be set by the Regional Spatial Strategy could be delivered.</li> </ul>
Regeneration Areas/ City Centres	<ul> <li>It was questioned how much housing could be delivered in the regeneration areas.</li> <li>Concern that the majority of development in these areas would be flats that are generally not suitable for families.</li> <li>The net increases (after demolition) may not be that high?</li> <li>Old housing units (terraced houses in Keighley was particularly mentioned) with poor living condition and limited local amenities should be replaced with new housings with increased density.</li> <li>The policies could focus on planned growth in dispersed areas rather than promoting one big growth in a particular area.</li> </ul>
Airedale and Growth Areas	<ul> <li>Good transport and communication link between all those potential areas is important and should be ensured.</li> <li>It was questioned the rational behind allowing only 'limited' development in some of the settlements within the Airedale corridor when it had been earmarked for economic growth.</li> <li>Airedale was not a particularly good area for growth.</li> <li>A more appropriate area for growth would be to the south of the city nearer to the motorway network.</li> </ul>
Social Housing & Affordable Housing	<ul> <li>Affordable housing</li> <li>Questioning how the demand for affordable housing be met in high demand areas such as Wharfedale</li> <li>It was suggested that 'exception sites' for affordable housing maybe required</li> </ul>

TOPIC WORKSHOP - HOUSING	
TOPIC	SUMMARY OF COMMENTS
	<ul> <li>Concerns that there are very limited facilities for people with specialised care needs (e.g. mental health) in the</li> </ul>
	smaller settlements and more rural parts of the District.
	The threshold triggering the provision of affordable housing should be lowered in areas where affordability is
	more of a problem. The 15 units+ trigger should be a minimum requirement only, reducing to 6 or 7 in areas like
	Wharfedale.
	New development would only represent a small percentage of the existing housing stock and thought the LDF
Existing Housing Stock	should seek to diversify the existing stock if possible.
	<ul> <li>More than 'limited development' was required in rural settlements to meet the housing and employment needs of</li> </ul>
	the population.
Rural Areas	It was suggested that mixed-use areas ought to be identified in rural areas to allow for both development and
	flexibility.
	<ul> <li>Employment allocation in Addingham - reclassified and developed to deliver affordable housing for young people.</li> </ul>
	<ul> <li>Need urban concentration.</li> </ul>
	<ul> <li>Need to develop employment opportunities in the villages.</li> </ul>
	<ul> <li>People do not work in villages so more housing here will result in more commuting.</li> </ul>
	<ul> <li>Need small scale development – social, LCHO, shared housing to accommodate local people.</li> </ul>
Density, Phasing and Brownfield	<ul> <li>Concern that stringent density policy hampered the delivery of affordable large family housing and thought that a</li> </ul>
Policy	more flexible approach was required.
1 oncy	<ul> <li>Brownfield targets essentially created a competition between local authorities.</li> </ul>

<b>TOPIC WORKSHOP - HOUSING</b>	
TOPIC	SUMMARY OF COMMENTS
	<ul> <li>Nobody though phasing policy was negative, however one delegate thought that it ought to be more responsive to undersupply.</li> </ul>
	<ul> <li>Density in terms of unit numbers is not appropriate. Ft<sup>2</sup> per hectare is much better.</li> </ul>
	<ul> <li>Phasing – needs to make housing delivery easy. It needs to be more flexible than the RUDP.</li> </ul>
	<ul> <li>Preference should be given to developing Brownfield sites first before permitting development on Greenfield</li> </ul>
	sites. In certain cases a kind of 'phasing' approach could be taken.
	<ul> <li>High densities are compromising the ability to deliver quality communities, enable family gardens to be offered.</li> </ul>
	One solution could be to set and overall density target across the District but allow flexibility within this, to allow
	family homes in centres which will allow more mixed communities to flourish.
	<ul> <li>The RSS hierarchy of settlement is flawed – Ilkley does not really serve a particular area – it is a subsidiary part</li> </ul>
	of Leeds and Bradford. Need to deviate from the RSS to show local distinctiveness.
RSS hierarchy	<ul> <li>Wharfedale should be the subject to a joint DPD with Leeds to cover Otley, Mentson, Guisley and Ilkley. This is</li> </ul>
	not beyond impossibility and would provide a better approach. We need to always consider what is happening at
	our boundaries. PPS3 and PPS12 already allow for joint working.
	<ul> <li>Areas of Outstanding Natural Beauty should be properly assessed and duly protected.</li> </ul>

# 2.2.2 Topic workshop - Transport & Accessibility

TOPIC WORKSHOP – TRANSPORT AND ACCESSIBILITY				
TOPIC	SUMMARY OF COMMENTS			
	• All communities need to be far more sustainable, at the moment, we have vast mobility and accessibility issues			
	for disabled and older people living in rural areas.			
	Dropping off children to school is one of the main causes of congestion in Aire Valley - consider role of travel			
	plans.			
	High volumes of movements on Leeds-Bradford Corridor, consider park and ride facilities for buses and trains.			
	<ul> <li>With growing trend towards freight through trains, need to take into account its poor links in Bradford.</li> </ul>			
	Provide car parking in city centre			
	• We need to adopt short term and long term objective. Short term for the use of private car as it is the most			
	attractive mode of transport at the moment. Long term for more sustainable mode of transport.			
Reducing Car Use and Congestion	• With rise in city centre living trend, we need to consider housing/flats schemes for them.			
	There are no direct bus services to Bradford Royal Infirmary (BRI) and St Luke's hospital.			
	• Planning should be reducing carbon footprints; planning should be looking long term rather than short term;			
	<ul> <li>The Council has a wide range of initiatives aimed at waste reduction, energy efficiency etc. but many of the</li> </ul>			
	bigger issues can only be addressed at national / international level;			
	<ul> <li>Planning polices need to recognise and work with the transport infrastructure and urban environment that we</li> </ul>			
	currently have - these provide constraints on what can be done; it also has to recognise the current levels of			
	movement and activity across the district;			
	The key to reducing car use is public transport – encouraging people to either not own or not use a car. Public			
	transport facilities and in particular pricing is important;			

TOPIC WORKSHOP – TRANSPORT AND ACCESSIBILITY				
TOPIC	SUMMARY OF COMMENTS			
	<ul> <li>More frequent rail services within the Aire Valley – the network is currently under utilised;</li> </ul>			
	<ul> <li>Bus deregulation was raised as a constraint on developing better more integrated public transport services and a</li> </ul>			
	limit on what public authorities, the WYPTE could achieve;			
	<ul> <li>The possibility of removing kerbs and having shared road space between all users – pedestrians, cars &amp; PT;</li> </ul>			
	<ul> <li>The importance of designing new developments with efficient access, for pedestrians, PT and service vehicle</li> </ul>			
	was raised;			
	While granting Planning Permission, consider use of section 106 Agreement to address the safety issues for			
	adjoining areas.			
	We need to change people perception towards safety by making more sustainable mode of transport not only			
	safe but perceived to be safe.			
Road Safety/Environmental	Provide continuous cycle lane.			
Pollution	• With economic regeneration more Lorries are going to come to the city. Need to provide Lorry Park. Also need			
	to consider setting a route for lorries.			
	<ul> <li>The level and affordability of hospital parking was raised as a problem issue;</li> </ul>			
	<ul> <li>The Council's highway design standards and policies need revisiting.</li> </ul>			
	<ul> <li>Most applications now have to be accompanied by traffic / transport impact statements and many schemes</li> </ul>			
	include travel plans;			

# 2.3.3 Topic Workshop - Waste Management

TOPIC WORKSHOP – WASTE	MANAGEMENT
TOPIC	SUMMARY OF COMMENTS
General Comments	<ul> <li>A lot already exists in the Bradford Municipal Waste Plan. The existing policies and plan are good but the biggest hurdle lies at the application stage, that being local objection.</li> <li>Time is a major factor, leading time and landfill capacity.</li> <li>There needs to be flexibility for technical change, plans are very rigid.</li> <li>The biggest challenge is community engagement and awareness. The public's perception of recycling facilities needs to change.</li> <li>The planning system should be used to maximise the use of recycled products.</li> <li>Utilise planning system policies to move away from basic standards.</li> <li>The burden resides with the commercial sector as there is little recycling in this area. It should be integrated with municipal waste treatment.</li> <li>Major issues exist relating to how to landfill should be dealt with.</li> <li>Composting should be encouraged.</li> </ul>
Design	<ul> <li>High density development often creates a large amount of waste soil and aggregate which then creates many lorry journeys and disposal problems etc. Density policy can actually damage the environment.</li> <li>Buildings should be built to standard sizes to cut down on waste – there is already best practice guidance on this.</li> <li>Buildings ought to be designed and built with de-manufacturing in mind</li> <li>New development must be required to have facilities to store, sort and manage waste.</li> </ul>

TOPIC WORKSHOP – WASTE	MANAGEMENT
TOPIC	SUMMARY OF COMMENTS
Waste Sites	<ul> <li>Sites need to be identified - criteria based policies alone are not sufficient - people will never like waste sites and politicians will respond to this by objecting.</li> <li>Other Authorities have allocated sites for specific methods of waste management and under provided for landfill in an attempt to force waste up the hierarchy.</li> <li>Waste management sites are not as contentious as waste disposal sites but it can still be very difficult to get permission</li> <li>Support for identification of sites in DPD</li> <li>Sites should be in close proximity to waste arisings</li> <li>Waste operations seen as bad neighbours even to other employment uses</li> <li>Support for one major integrated facility</li> </ul>
Waste Management	<ul> <li>The Council need to work with and award contracts to smaller local niche waste management/ recycling companies.</li> <li>Waste from the construction industry is already very efficiently dealt with. Most building sites have separate skips to sort materials and then this material is sorted further by the skip operators.</li> <li>Local Authorities need to have overall responsibility not only for municipal waste but for all types of waste within the Authority.</li> </ul>
Waste Technologies	<ul> <li>Waste to energy is not currently utilised in this District – this needs to be done.</li> <li>New technologies need to be encouraged</li> <li>The authority need to use new ways of thinking and award contracts in a way that encourages new technologies.</li> <li>Thermal recovery technologies – provide opportunities for a low cost local source of energy. Potential</li> </ul>

TOPIC WORKSHOP – WASTE MANAGEMENT				
ТОРІС	SUMMARY OF COMMENTS			
	opportunity for energy supply to be used help to persuade local community			
	<ul> <li>There are problems with the classification of waste which makes movement and re-use of materials too</li> </ul>			
Legal Issues	expensive.			
	<ul> <li>Planning policy should not create any more red-tape – solutions require flexibility</li> </ul>			
	<ul> <li>Fiscal incentives such as landfill tax are the most effective measure to encourage reuse and recycling.</li> </ul>			
Regional / Sub-regional approach	<ul> <li>Need to explore joint approaches to tackling waste (Leeds, Craven, Calderdale) and possible integrated solutions</li> </ul>			

# 2.4 Planning Aid Events

The two events organised by Yorkshire Planning Aid adopted a similar approach to the Area Conference Workshops held by the Council in terms of an introductory presentation followed by facilitated break-out groups.

BME COMMUNITIES				
Date	Time	Group / Organisation	Venue	No. of Attendees
13 <sup>th</sup> June 2007	6 – 8pm	BME Community	Kidmat Centre, Bradford	30
18 <sup>th</sup> June 2007	1 - 3pm	BME Community	Highfield Centre, Keighley	6
			TOTAL:	36

2.4.1 The key points and issues raised at these events are listed below:

- The need for sustainable settlements
- There is a need for a mix of housing and housing which is affordable
- Poor social housing facilities, especially for refugees
- Design should respect local character
- Mixed use developments of community facilities
- Lack of community facilities and youth provision
- Lack of open space in Keighley
- More health care facilities needed
- High BME & young people unemployment
- Businesses want accessible sites
- Need for training centres
- Poor integration of public transport and no public transport links to M606 industrial area

# 2.5 Media – Press Releases

2.5.1 The following pages provide a record of the media coverage which surrounded this Issues and Options consultation. Some of the newspaper articles as listed within 2.3.3 within the main report are provided in the following pages.

#### 2.5.2 Telegraph and Argus – 1<sup>st</sup> February 2007

or new mose Day 2007 at the London Eye COUNCIL: PUBLIC TO HAVE THEIR SAY ON NEW FRAMEWORK by JO WINROW

PLAN:

Anne Hawkesworth is

public input to the planning debate

Executive member

calling for

# **City Hall Reporter**

The first in a series of "critical" docu-ments which will shape the develop-ment of the district is set to be debated. In the oning weeks, Bradford Council will take the first steps towards producing a new far-reaching vision – the Local Development Framework.

Development Framework. The documents will ultimately replace the Unitary Development Plan (UDP). They will set out planning policies and map out what the area will look like. The Council's executive will be asked to kick-start the debate with residents, busi-nesses and other groups when it meets on

nesses and other groups when it meets on Tuesday.

Tuesday. Group planning manager Andrew Marshall told the Telegraph & Argus: "This is a critical document and a key decision and we have got to get it right. It's about where we want to be as a whole district in the next 20 years." The framework will include detailed documents on transport, waste, commu-nity services, education and housing needs as well as on areas, including Bradford city centre regeneration.

Bradford city centre regeneration.



One of the first of the documents is the Core Strategy, which will set out the broad framework from which the other documents will follow. It will not identify individual sites, but

ing, employment, retail, leisure, commu-nity and public services and transport. It will also look at how the district can

contribute to national, regional and local requirements for minerals and create sustainable waste management facilities.

The strategy will conform with the Yorkshire and Humber Assembly's

# What should planning priorities be for the Bradford district?

Join the debate on this and many other topics i the new Forums on our website at: http://forum.thetelegraph andargus.co.uk/

Regional Spatial Strategy, which is due to

become law in the autumn. Councillor Anne Hawkesworth, the ex-Councillor Anne Hawkesworth, the ex-councillor Anne Hawkesworth, the ex-ecutive member for the environment and culture, said: "The core strategy is an overarching vision of how the Council would like to see the district develop in the future. As with the UDP, it is essential that people get involved with this process and ensure their views are heard." If the executive agrees, the Council will hold a series of workshops in Airedale, Wharfedale and Bradford, in March. All the documentation can be viewed from Friday, February 16, on the Council's website at www.bradford.gov.uk/plan-ning and at the planning office in Jacob's Well, Bradford; Keighley, Shipley and Ikley town halls; and Bradford, Shipley, Keighley, Bingley and Ikkley libraries.

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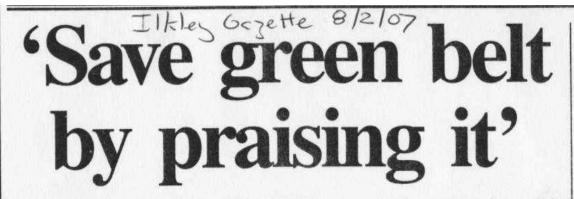
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#### Craven Herald & Pioneer - 8<sup>th</sup> February 2007 2.5.3

# Development blueprint

A DEBATE has started on how Silsden, Steeton and Eastburn will develop over the next two decades. Bradford Council's executive met on Tuesday to discuss forming the "core strategy" for developing the Local Development Framework, which will ultimately replace the Unitary Development Plan. Local groups, including Silsden Town Council and Steeton-with-Eastburn Parish Council will be consulted and residents will be encouraged to take part in a series of workshops set to take place in March.

# 2.5.4 Ilkley Gazette – 8<sup>th</sup> February 2007



RESIDENTS of Wharfedale will have to mobilise themselves to make sure their beautiful surroundings stay that way, according to an Ilkley Councillor.

The best way to prevent housing developers moving into Ilkley's green belt was to sing its praises, said parish and district councillor Anne Hawkesworth.

Bradford Council is poised to take the first steps towards producing a new far-reaching vision of how the district will develop.

Leaders kick-started the debate with residents, businesses and other parties, on how they would like to see the district develop at a meeting this week.

The Local Development Framework (LDF) is a set of documents which will ultimately replace the Unitary Development Plan (UDP). The documents will be devised over the coming years and will set out planning policies for the district and map out what the area will look like in the future.

The framework will include detailed documents on transport, waste, community services, education and housing needs as well as documents looking at individual areas, such as the

## by PAUL LANGAN

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green belt in Wharfedale.

One of the first of these is the Core Strategy which will set out the broad framework from which the other documents will follow.

The Core Strategy will not identify individual sites, but will set out broad policies and areas for housing, employment, retail, leisure, community and public services and transport.

It will also look at how the district can contribute to national, regional and local requirements for minerals and create sustainable waste management facilities.

Coun Hawkesworth, the Executive Member for the Environment and Culture, said: "As with the UDP, it is essential that people get involved with this process and ensure their views are heard."

The council is looking to get the community more involved in the process in the early stages and tackle contentious issues from the start.

The council will hold a series of workshops on topics such as housing, employment, waste and transport and area workshops in Airedale, Wharfedale and Bradford. It will also use the council's web site to raise issues and encourage people to express their views.

All the documentation involved in the Local Development Framework can be viewed in its draft form at Ilkley Town Hall and Ilkley Library. It can also be viewed and downloaded on the Council's web site at (www.bradford.gov.uk/planning).

Coun Hawkesworth urged people to take part in the consultation process to prevent more than slight tinkering around the fringes of the Wharfedale greed belt.

She said: "For me the green belt is the most important thing and has done a wonderful job which you can see if you go up on the Cow and Calf."

"We have adequate housing cover by the regeneration of brown field sites nearer the city. There is no need for the green belt to suffer. But if we haven't consulted properly we will get knocked back.

"If people think Ilkley is pretty grand as it is, then I think they should say so."

#### 2.5.5 CBMDC Community Pride – Issue 2 March 2007

# Planning for the future

You've only got a couple of weeks if you want give us your views on the first stage of a new plan which will shape the development of the district over the next 15 to 20 years. The Core Strategy, part of the new Local Development Framework, covers eight issues and options areas – including transport, waste, community services, education and housing land needs. It will set out broad planning policies and generally map what the area will look like.

The eight topic papers, inviting your views on the big issues facing the district, are available until 30 March at the planning office in Jacob's Well, Bradford; Keighley, Shipley and Ilkley town halls; main libraries; and online at www.bradford.gov.uk/planning

#### 2.6 Written Representations

A total of 66 written representations were received at this Issues and Options stage of public consultation on the Core Strategy DPD. A full summary of these representations can be found in an accompanying 'Summary of Representations' document which can be downloaded from the Council's website.

Due to the varied nature of the responses received and the repetition of comments, the key issues and comments of the representations have been summarised within Appendix 3 overleaf. Reponses to the specific questions posed within the Topic Papers have been recorded and additional comments, suggestions and points have also been noted.

# **APPENDIX 3:**

CORE STRATEGY DPD: ISSUES AND OPTIONS CONSULTATION – SUMMARY OF COMMENTS RECIEVED

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
TOPIC PAPER 2: SPATIAL VISION	AND STRATEGY FOR BRADFORD	
Question 2.1:	There was general support for the spatial vision, particularly	All comments acknowledged. The vision for
Is the vision right?	for the enhancement of Bradford City as a key regional	Bradford has been revised in light of comments
	centre. In addition, support was given for the need to protect	received, recent changes and up-to-date evidence
	the natural environment, local heritage and the reinforcement of local distinctiveness. There was clear	base reports. The revised vision can be found in the Further Engagement Draft document.
	recognition of the role that new house building and	
	employment opportunities can play in delivering this vision	
	for Bradford.	
	There was recognition that the vision needs to be expanded	
	and expressed in a more spatial manner; the future roles of	
	settlements to be described and Bradford's role within the	
	Leeds City Region and the need for joint working with	
	adjoining authorities be recognised. Further suggestions for	
	the vision to consider included the need to reflect the	
	proposals in the Airedale Masterplan; acknowledge the	
	causes and effects of climate change; aim for high quality	
	open spaces; improve access through public transport;	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	reference to be made to the arts, leisure or education;	
	specific reference to sustainable development.	
Question 2.2:	The majority of respondents were in agreement that the	All comments acknowledged. The spatial
Are the objectives appropriate to	objectives put forward were appropriate; in particular there	objectives have been revised in light of comments
deliver the Vision? Are there any	was support for the role of new housing and employment	received and an up-to-date evidence base. The
omissions?	opportunities; enhancements to the natural environment and	revised objectives and monitoring framework can
	references to connectivity and the improving public	be found in the Further Engagement Draft
	transport.	document.
	A number of respondents commented that there was a need	
	for more clarity within the objectives and that there was no	
	sufficient information on how best to monitor progress, track	
	any changes forecasted, and provide a flexible and	
	responsive approach or how the Council was going to	
	deliver that changes required in Bradford.	
Question 2.3:	The majority of respondents were in support of the	All comments acknowledged. The locational
Are the locational principals correct?	locataional principles, in particular for limited development in	principles have been revised in light of comments
	the larger settlements in Wharfedale and that the provision	received and an up-to-date evidence base. The
	of infrastructure is key to this approach. It was welcomed	revised vision can be found in the Further
	that priority is to be given to development on previously	Engagement Draft document.
	developed land, however flood risk is important in deciding	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	<ul> <li>locational principals</li> <li>They should reflect the approach of the Airedale Masterplan</li> <li>There needs to be recognition of the recent planning history within each settlement</li> <li>They are inconsistent with Draft RSS</li> </ul>	
	<ul> <li>Biodiversity value on brownfield sites should be taken into consideration</li> <li>No reference to sustainable urban extensions</li> <li>Raising densities in the urban areas may be problematic as these areas already suffer from high densities and are in need of green open spaces and parklands to improve their environments.</li> </ul>	
Question 2.4: What are the roles and functions of each of the settlements over the next 20 years?	A number of respondents indicated the need for the towns and villages within the District to remain as they are now and to receive growth only for local need. Wharfedale was particularly identified as an area which is currently at capacity in terms of housing and the local transport network. Comments also made reference to the Airedale Masterplan and the role and function this document outlines for the main settlements of Keighley, Bingley and Shipley.	All comments acknowledged. The role and function of settlements have been revised in light of comments received and an up-to-date evidence base. The revised vision can be found in the Further Engagement Draft document. The role and function of settlements within Bradford has been captured within the revised draft Settlement Study. This document sets out the role,

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	It was highlighted that role and function of settlements should be the subject of a separate evidence base to support any future policy.	function, characteristics and constraints of each settlement within the District.
Question 2.5: Is the defined hierarchy appropriate?	The majority of respondents agreed that the defined hierarchy was appropriate.	Noted.
Question 2.6: Should the City of Bradford be the focus of the majority of development?	<ul> <li>A large number of respondents agreed that the City of Bradford should be the main focus for the majority of development as this represents the most sustainable pattern of development. Further comments included:-</li> <li>Increased densities and making effective use of previously-developed land.</li> <li>Promote the redevelopment of strategic sites</li> <li>Growth needs to be shared across the District and particularly through the Aire Valley growth corridor.</li> <li>Ensure that development and redevelopment proposals within the Shipley area will not have an adverse impact upon the character or setting of the World Heritage Site at Saltaire.</li> <li>Should be informed by a Strategic Flood Risk</li> </ul>	All comments acknowledged. The role of the City of Bradford has been informed by a number of different factors, particularly by the way in which it currently functions and how the Council sees it functioning in the future. An up-to-date evidence base and comments have been taken into consideration as the Council have developed the Further Engagement Draft document.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 2.7:	The majority of respondents stated that the role of lower	All comments acknowledged. Whilst the Council
What should be the role of lower order	order settlements should be to meet the needs of residents	agrees with comments that the role of lower order
settlements?	and also be given greater support. It was also recognised	settlements should be to meet needs, in some
	by a respondent that this role should be subject to evidence.	areas there may be need to go beyond local need
		in order to help meet the Districts housing
		requirement. The Further Engagement Draft
		document has been prepared in light of a variety of
		new and revised evidence which demonstrate a
		number of factors such as local need. The Council
		has noted comments received as the Further
		Engagement Draft document has been prepared.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 2.8: What factors should be used to select those settlements and villages to be identified for future development?	The majority of responses supported all the factors put forward in particular the need for the evidence base and capacity to inform decisions and the accessibility of sites.	<ul> <li>Agree. The Council has prepared or commissioned a number of pieces of evidence to demonstrate the factors which should be used to select settlements for future development, these include:</li> <li>Draft Growth Assessment (2011)</li> <li>Strategic Housing Land Availability Assessment (SHLAA) (2011)</li> <li>Draft Local Infrastructure Plan (2011)</li> <li>The Further Engagement Draft has been prepared using the information and evidence available to support the general approach to future development.</li> </ul>
Question 2.9: What is the role of the centre?	It was agreed as part of that consultation that the Airedale Masterplan identifies a number of distinct roles of the three major towns of Keighley, Bingley and Shipley; the role and function of each settlement should be the subject of a separate evidence base. The centres support the core needs of the outer areas and they play an important role in the future growth of the District.	Agree. The Council commissioned a Retail and Leisure Study, which was completed in (2008). This report analysed all of the district and local centres within the District and has informed the Council's understanding of the current and future role and function of the centres.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 2.10: What infrastructure requirements are needed to deliver the above approach?	Each of the options put forward for this question were equally supported during this consultation. Respondents recognised the important of having the right infrastructure in place to support the population and increased development in the future.	Since the Issues and Options consultations the Council has produced a Draft Local Infrastructure Plan (2011) to inform the Further Engagement Draft over the plan period.
Question 2.11: What are the key benefits and disadvantages of the alternative options?	The key benefits of the alternative options were highlighted to be the regeneration of the city centre and its renaissance; the acknowledgement the role of the settlements in the District and focusing development on the City of Bradford is a sustainable option.	All comments acknowledged. Since the Issues and Options consultations, the Council has prepared or commissioned a number of pieces of evidence to support the development of the Further Engagement Draft. The following evidence bases have been used:
	Responses regarding the disadvantages of the three options surrounded the implications of development at the edge of settlements or the Green Belt. Option B was considered to be unsustainable. Concerns were raised of the need for flexibility to respond to changing economic circumstances.	<ul> <li>Draft Local Infrastructure Plan (2011)</li> <li>Draft Growth Assessment (2011)</li> </ul>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 2.12: What other options are there to deliver the vision?	<ul> <li>Options put forwards included:</li> <li>The need to promote sites close to the city centre for mixed uses;</li> <li>The use of compulsory purchase and redevelopment of large tracts of derelict industrial/warehouse land in urban areas; and</li> <li>The regeneration of the Airedale Valley from Shipley to Skipton</li> </ul>	<ul> <li>Comments noted. The Further Engagement Draft report has taken into account recent evidence to inform the spatial approach such as a:</li> <li>Draft Local Infrastructure Plan (2011)</li> <li>Draft Growth Assessment (2011)</li> <li>Strategic Housing Land Availability Study (SHLAA) (2011)</li> </ul>
TOPIC PAPER 3: MEETING THE NEEL	D FOR DWELLINGS IN THE DISTRICT	
General Comments on	The tPCT welcomes the affirmation of the need for housing	Comment noted.
Topic Paper 3: Meeting the Need for Dwellings in the District	location to support access to key services such as education, employment, health and leisure.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Housing Supply Question 3.1: How best should the additional housing requirement set out by the Region, be accommodated in the District?	There was support for all the options put forward for this question and for a combination of these. The majority of support was given to the following options: 1) by focusing the majority of development in the city centre neighbourhood development areas and along the route of the proposed canal; 2) by redeveloping underused land and buildings in the inner areas; and 3) by enlarging the main urban area with urban extension sites. Further options put forward included in sustainable locations, utilising previously developed land; through mixed use developments and the release of Phase 2 housing sites.	The Core Strategy seeks to maximise the contribution to be made by these 3 options. However the reality of the scale of the housing requirement and the limited nature of the land supply within Bradford, as set out in the SHLAA (2011), means that a combination of all options, including urban extensions and growth in the smaller settlements will be required. The Council has set out its approach with regards to housing supply within <b>Policy HO2 (Strategic sources of supply</b> ).
House Building in Bradford Question 3.2: How should the Council ensure that enough dwellings are provided in the right places in the District to meet local needs in a sustainable manner making most effective use of land and buildings?	There was a mixed response to this question and the options put forward. The majority of respondents supported a targeted approach to density which promotes higher densities in locations well served by public transport and infrastructure. Support was also given to the release of greenfield land in strong market areas. Despite these options being generally supported, there were some respondents who disagreed with these approaches. Respondents commented that focusing only on urban areas will promote unbalanced development in favour of towns and	The Council has set out its approach with regards to density within <b>Policy HO3 (B)</b> ( <b>Distribution of</b> <b>housing requirement</b> ) of the Further Engagement Draft document. This seeks to promote efficient use of land whilst also recognising that account will need to be taken of the type of housing needed and the characteristics of the area around each site in reaching the best possible density.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	cities and will not meet local needs; however others stated that the Green Belt and/or Safeguarded Land should not be used for housing at all. It was noted that the LDF should be informed by the SHLAA.	Both current (RUDP) and future (LDF) policy is likely to promote and require higher densities in locations accessible to public transport and services but it has been decided that the Core Strategy should only set an minimum density level of 30dph with more detailed and possibly higher targets being set according to local circumstances on an area by area basis in the Allocations, Shipley / Canal Road and City Centre DPD's. The Core Strategy has been informed by the SHLAA (2011) and further SHLAA updates will inform the site allocating DPD's within the LDF. The land supply analysis contained within the SHLAA has revealed that it will be impossible to meet the need for new homes without the use of safeguarded and green belt land and the policies within the Further Engagement Draft document recognise and articulate this conclusion.
Affordability	The majority of respondents favoured a requirement of	Policy HO11 (Affordable Housing) of the Further
Question 3.3:	different sites to make provision in relation to a percentage	Engagement Draft document sets out an approach
How should the needs of all sections of	based on the market area and need which promotes a	which follows these suggestions by adopting
	higher requirement in areas of highest need (e.g.	varying percentage requirements across the district

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
the community for a decent affordable	Wharfedale), however it was commented that this may	and adopting lower site size thresholds at which
dwelling be met?	undermine viability of developments. Also favoured was the	these 'quotas' will be applied in Wharfedale and
	approach to lower the site size threshold where developers	the villages. The approach accords both with the
	are expected to provide affordable housing in areas where	results of the SHMA (2010) and the AHEVA (2010)
	there is an acute shortage of affordable housing or provision	which tested viability levels across the district.
	is negotiated on a site by site basis.	
		Finally Policy HO11 (I & J) (Affordable Housing)
	It was quested if there should be a policy on rural exception	of the Further Engagement Draft document does
	for sites for affordable housing.	indeed contain a rural exceptions site approach.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Local Issues and Demographics	There was equal support for defining density on a site-by-	These matters are addressed in <b>Policy HO8</b>
Question 3.4:	site basis; drawing up site briefs and asking developers to	(Housing Mix) of the Further Engagement Draft
How can the correct balance of house building and creation of new dwellings	submit detailed analysis and reasoning on the type and style of development.	document. The policy, which is indeed informed by a SHMA (2010), sets out general principles without being too prescriptive.
in the District in terms of type and size	Further comments states that the LDF should not be too	3
be achieved?	prescriptive over house types and tenures and the market	
	should be allowed to decide on the type of housing for any	
	development which could be justified through the design and	
	access statement submitted with an application. The LDF	
	must plan for balanced communities where new housing	
	developments include a mix of dwelling types and tenures	
	accommodating a range of needs. This includes making	
	special provision of the needs of the elderly by planning for sheltered accommodation in the most sustainable locations.	
	Ten respondents commented that this should be informed by	
	a Strategic Housing Market Assessment (SHMA).	
Local Strategic Considerations	The majority of respondents agreed that areas should be de-	Comments noted. The Development Plan
Question 3.5:	classified to allow housing use such as mixed use areas	Documents (DPD's) which allocate sites will review
To what degree about land surrently	where possible, however the Council should take a careful	existing employment sites and mixed use areas
To what degree should land currently or previously used for employment	and balanced approach to this.	and seek an approach which makes best use of

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
purposes be considered for housing		each site and meets overall goals for the provision
redevelopment?		of both new homes and jobs.
Question 3.6:	The majority of responses claimed windfall developments	Given the scale of population and household
What role do the smaller settlements	could contribute towards housing growth in the smaller	growth and therefore housing need across the
have in delivering housing growth?	settlements, along with the allocation of small housing sites.	district, all settlements, including smaller ones will
	Few responses highlighted that this should be the last resort,	probably need to make a contribution to future
	or no developments should take place in the smaller	housing development required.
	settlements.	
		The national approach to windfall is set out in
		Government policy (PPS3) and rules out an
		assumed windfall contribution in the first 10 years
		of the plan period. However the Core Strategy is
		proposing an assumed windfall contribution across
		the district in the final 5 years of the plan period.
		However most of such windfall opportunities are
		likely to occur in larger settlements and urban
		areas not small or rural settlements.
		The reduction of the site size threshold from 0.4ha
		in the RUDP to 0.2ha in the LDF should allow for
		the identification of suitable small sites in both
		small and larger settlements across the district.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 3.7: Should the level of availability in services and facilities be addressed before further housing is planned, or expanded later?	The majority of respondents agreed that services and facilities should be addressed for further house building is planned. Comments remarked that it was imperative and an education audit on a ward by ward basis should be undertaken as part of the evidence base. On the other hand it was suggested that the release of safeguarded land around settlements could act as a catalyst for infrastructure improvements.	Timing and phasing of development in relation to service and infrastructure provision is a key issue and is addressed in the infrastructure plan which accompanies the Further Engagement Draft document. The phasing of the release of sites as set out in <b>Policy HO4 (Phasing the release of</b> <b>housing sites)</b> will allow service provision to be taken into account but as some of the respondents noted there will be occasions where development may actually facilitate the delivery of the infrastructure required. Both phasing and infrastructure issues will be dealt with in more detail within the site allocating DPD's within the LDF.
Question 3.8: Should the LDF intervene in areas of significant affordability problems?	There was a mixed response to this question with the majority agreed the LDF should intervene. One respondent disagreed and stated that this issue should be left to market forces.	It is a clear role of the LDF to both assess and make provision for affordable housing with need identified within a SHMA (2010) and impacts on viability and delivery of new homes tested through an AHEVA (2010). These background evidence base documents have been produced showing a clear need for the Core Strategy to 'intervene' to ensure the delivery of affordable homes. <b>Policy</b>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
		HO11 (Affordable Housing) therefore addresses these issues accordingly.
Question 3.9: What approach should the LDF adopt in areas of low demand or low market confidence?	All respondents favoured the need to encourage affordable housing and mixed densities; regeneration to raise confidence and avoid high densities. However there needs to be an understanding as to why there is low demand in the first place in specific areas.	Comments noted. The Council is undertaking a series of local housing studies which will seek to regenerate areas and identify the steps necessary to support markets in areas of low demand. Sites will be allocated in the Allocations, Shipley / Canal Road Corridor and City centre DPD's so as to compliment and support existing housing markets, increase choice and deliver balanced and mixed communities.
Question 3.10: Should Bradford always give priority to housing developments on previously developed land and continue to press for higher densities?	The majority of respondents supported the Council giving priority to housing developments on previously developed land, stating that these sites can lead to their decontamination and remediation and should be promoted. However it was also commented that there will be circumstances where Green field sites present opportunities to provide deliverable and developable housing opportunities.	Policies HO6 (Maximising the use of Previously Developed Land) and HO7 (Housing Site Allocation Principles) seek to maximise the use of previously developed land. However the reality of Bradford's situation with a very large requirement for new housing and a very constrained supply of developable land mean that substantial amounts of green field development will also be necessary. Moreover national Government policy requires that targets and expectations for the development of previously developed land are

ТОРІС	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
		informed by an analysis of the nature of the land supply and the viability of bringing such sites forward.
		It should also be recognised that a site's status as green field or previously developed is not the only factor in determining how sustainable that site is. It is possible to identify green field sites which because of their location with regards to services and public transport are more sustainable than some previously developed sites.
Question 3.11: How best can additional housing needs in the main urban areas and the needs of smaller settlements be accommodated in the District?	Support was given to all the options put forward for this question with respondents favouring undertaking a Strategic Housing Market Assessment (SHMA) study and via consultation with local communities.	A SHMA (2010) has been undertaken and will be published alongside the Further Engagement Draft document. The document was based on surveys of the local population and the production of the document was, in line with Government guidance, overseen by a working group comprising both developers and Council officers and representatives of the Bradford Housing Partnership.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 3.12: How much flexibility should there be in the Plan to ensure that it can respond to an under or over supply of homes?	Respondents commented that the Council should take an approach which continually monitors the level of housing sites in the five year supply and ensuring there are enough sites. There should always be a 15 year land supply, and there should be a "reserve" that can be brought forward immediately if there are any shortfalls, therefore the approach must be responsive to market pressures.	These issues will be covered by both the strategic policy contained within the Core Strategy, the allocation of sites within the LDF and the continual monitoring and updating of the land supply situation via the SHLAA, AMR, and 5 Year Land Supply statements. The housing implementation and delivery strategy which forms part of the Further Engagement Draft document sets out, in broad terms, the actions which will be taken if delivery departs excessively from the predicted or required trajectories / targets.
TOPIC PAPER 4: ECONOMY AND JO		
General Comments on Topic Paper 4: Economy and Jobs	Respondents stated that the Paper should be revised to take account of the recently launched Economic Strategy for the District and refer to the importance of the role of tourism and the arts in the local economy.	Agreed. The economy chapter of the Further Engagement Draft document has been informed by and set within strategic policy for the District, including the Bradford District Economic Strategy 2011-2013. Under <b>Policy E3(E): (Employment</b> <b>Land Requirement)</b> , support is given for culture, media and tourism activities which are recognised as priority business sectors that are interlinked with the wider market, economic process.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Economic Trends	The majority of respondents agreed that providing less	The Employment Land Review, undertaken in
Question 4.1:	land, but in the right locations would be beneficial to the	2006/7 recommended that the Council allocate 214
How can the LDF contribute to	district. Little support was given to the provision of more	hectares of land for employment purposes based
providing greater prosperity to the	land and providing better quality sites.	on an unconstrained economic growth scenario.
District?		As demand was calculated during a buoyant
		economic climate, the projection for future jobs
		growth has since been revised and a much
		reduced target for the allocation of land has been
		applied. However, the District suffers from high
		levels of worklessness, and in order to help
		eradicate this problem, it is important to create the
		right conditions for economic growth and part of
		this is to provide sufficient land, made up of
		attractive quality sites, in the right locations for
		future economic development.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Employment Land Supply and	Respondents outlined that the LDF should ensure there is	Noted. These comments have been addressed in
Forecasts	the right amount of land by basing land allocations on	Policy EC2 (Supporting Business and Creating
Question 4.2:	statistical employment forecasts such Experian & statistical	Jobs). Projections were based on the Regional
	employment forecasts, with support also for a more	Econometric Model, developed and managed by
How does the LDF ensure there is the	pragmatic led approach. However it was commented that	Experion. However the recent extreme highs and
right amount of land allocated for	there needs to be an element of flexibility to allow for	lows of the economic cycle have resulted in
employment use?	changes in industry, commerce and other economic	varying projections on future jobs growth.
	development.	Calculations for land demand are therefore
		targeted midway in the cycle allowing flexibility for
		changes in future patterns of uptake.
The location of employment	There were mixed views to this question, with respondents	The locations for new employment sites are
activities	favouring all options equally. Some suggested that the	determined strategically in the Core Strategy and
Question 4.3:	release of employment sites should be strategically	addressed under Policy EC3 (Employment Land
	controlled to ensure development is targeted at areas such	Requirement). The individual site characteristics
Where should the LDF allocate land for	as Bradford City Centre, the main urban area, and those	will be assessed at the Allocations DPD stage.
employment uses?	areas identified as regeneration priorities. This would apply	The strategy identifies sustainable and accessible
	to the smaller towns and villages where there is a need for	locations such as the city centre, the M606
	employment opportunities to maintain vitality and so not to	corridor, Airedale and the Leeds/Bradford corridor
	become dormitory settlements for the larger towns.	as the parts of the District most attractive and
	However, others suggested that a flexible approach should	advantaged in order to compete for new
	be taken in terms of allocating employment sites, and	investment. The individual characteristics of sites

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	possible. Such sites should also be informed by a sequential test and the Strategic Flood Risk Assessment (SFRA) and should not be located where it may affect recognised wildlife sites.	at Allocations DPD stage, providing the right sites in the right locations accommodating differing market requirements.
Protecting existing employment land and buildings Question 4.4:	The majority of respondents favoured two out of the five options, these being to protect sites in certain locationally suitable areas and protect sites in the exiting employment	These points are addressed under <b>Policy EC3(A)</b> (Employment Land Requirement). All existing allocated employment sites will be assessed in
Where and how much of the stock of existing employment land and buildings should be LDF be protecting?	zones. None of the other options were supported. Further comments suggested employment sites should be de-allocated in some circumstances if the sites are not longer viable or if there has been no interest over the Plan period.	terms of their suitability to meet the aims of the strategy and their suitability to meet modern market need. Similarly, employment zones will also be assessed in terms of their performance criteria. Under <b>Policy E4(C) (Sustainable</b>
	P 2 2 2 .	<b>Economic Growth),</b> existing operational employment sites will also be protected against other forms of development such as housing.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Definition of Employment Uses Question 4.5: How should be LDF define employment uses?	The majority of respondents supported the option that the definition should be widened to include other employment generating activities. The definition of employment should recognise the importance of local employment, such as shops and pubs especially in small settlements and be sufficient flexibility to allow for diversification in the rural economy. There was limited support for the other two options.	The Core Strategy will evaluate jobs growth in its widest definition, using the Standard Industrial Classification terminology and relating it to recent research on jobs to floorspace ratios. It recognises that different sectors of the economy will have their own specific growth patterns site specifications and locational requirements. These variations are addressed as part of the overall economic strategy.
Question 4.6: How can the Core Strategy support the rural economy, in particular agricultural diversification?	Respondents stated that the Core Strategy should place a greater focus on supporting sustainable approaches to farming, tourism and land management, including the re-use and redevelopment of farm buildings to assist local businesses and the economy in order to secure the long term future of the district's rural areas.	The importance of the rural economy is recognised within the Core Strategy and rural diversification is addressed directly under <b>Policies EC4(F) and</b> <b>EC4(G): (Sustainable Economic Growth).</b>
	incubator and live/work units to encourage the development of small and medium enterprises; and an approach to allow for the extension or erection of new agricultural buildings where there is a proven need.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE	
TOPIC PAPER 5: TRANSPORT AND A	TOPIC PAPER 5: TRANSPORT AND ACCESSIBILITY		
General Comments on Topic Paper 5: Transport and Accessibility	Some respondents questioned the sustainability of strategy which seeks to increase housing in city centre but focus main employment in Airedale. Existing businesses require good access to local and national road network and transport policies must support economic and regeneration activity in the four economic hubs of Bradford.	The City Centre and Airedale are both important areas for residential and employment generation but these areas must be seen within the bigger picture of all areas within the District which will show a sustainable pattern of development focused around transport corridors with good existing or future access to sustainable public transport links. <b>Policies TR1, TR3, TR4, TR5, TR6 and TR7</b> will assist with providing access to a good local and national road network and the policies all support economic and regeneration activity.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Accessibility Question 5.1: How can the LDF contribute to the enhancement of existing accessibility to jobs, services and facilities?	The majority of respondents supported all or a combination of the options put forward. In particular locating new housing close to jobs and services, creation of mixed use developments and maximise development at key public transport nodes. Improvements to road, rail and air remain key issues for business within the District.	Noted. Policy TR1 (Travel Reduction and modal shift) will allow for mixed-use developments and maximise development in sustainable locations, which reduce the need to travel. Public transport nodes are to be developed under Policy TR3 (Public transport, cycling and walking). There are no airports within Bradford's boundary, however improvements to roads and rail and better access to air travel will be sought through policies TR1(D) (Travel reduction and modal shift), TR3 (C4) (Public Transport, cycling & walking), and T7 (Transport investment and management priorities)
Question 5.2: How the LDF can assist in securing accessibility to jobs services and facilities for new development?	All, or a large majority of the options put forward were supported in this question. Some commented that cycling and walking, whilst important, should not be a priority.	Noted. <b>Policies TR1, TR2, TR3 and T7</b> will assist in securing accessibility to jobs, services and facilities. Public transport, walking and cycling all have different contributions to bring in making that accessibility more sustainable and the policies do not pre judge the importance of one sustainable travel mode over another.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Congestion Question 5.3: How can the LDF transport policies influence the level of car use and road congestion?	The majority of respondents favoured the promotion of other forms of transport to travelling by car, with the addition of limiting car parking and encourage the use of public transport and the creation of more long distance cycle networks, particularly between stations, colleges and universities. Equal support was given for a combination of all the options provided for this question. Some respondents highlighted that current rail services are already running at capacity in Airedale and Wharfedale. Plus a Park and Ride scheme at specific locations for example at Odsal would help congestion into the centre of Bradford.	Transport <b>policies TR1 to TR7</b> all support the development of sustainable transport. Specifically <b>Policy TR1</b> encourages travel reduction and modal shift; <b>Policy TR2</b> looks at parking policy to support sustainable travel choices while <b>Policy TR3</b> encourages public transport, cycling and walking.
Road Safety Question 5.4: How can the LDF transport policies improve road safety?	The proposed approach to require financial contributions from developers to improve safety and develop new highway design policies was supported. In comparison, limited support was given to continuing to use existing highway design policies.	The Council's commitment to road safety is given in <b>Policy TR1(A)</b> , which promotes "the highest standards of road safety" within the District.

ΤΟΡΙϹ	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Air Pollution / Environment Question 5.5: How can the LDF transport policies	The majority of respondents favoured either all of the options put forward or a combination approach. The promotion of alternatives to the car, promotion of rail freight, limit car parking and locating development in areas of high public	Agreed. These issues have been addressed within policies TR1 (Modal Shift); T2 (Parking Policy); and T6 (Freight).
minimise the effects of noise, vibration and air pollution caused by traffic?	accessibility were all supported.	Airport connections important in terms of linking District to national and international markets.
	Further comments relating to air travel highlighted this method is the most polluting mode of travel and that caution should be taken in developments that promote, support and encourage the use of the airport.	<b>Policy TR1</b> looks at enhancing routes to Leeds Bradford International Airport and Manchester Airport.
Economy	The majority of respondents agreed with the options put	<ul> <li>Noted. Accessibility via sustainable means is</li> </ul>
Question 5.6:	forward here, in particular ensuring high levels of	taken up in <b>Policy TR1</b> and freight movement
How the LDF transport policies can support economic activity and	accessibility to key businesses; continue with exiting policies; facilitate freight movement and support capacity improvement for HGVs on the strategic highway network.	<ul><li>• Policy TR3 supports public transport</li></ul>
regeneration efforts? Question 5.7:	However concerns were expressed for the need to promote public transport over accessibility by the car.	<ul> <li>Policy T7 supports transport investment and management priorities in hierarchical order of</li> </ul>
How the LDF transport policies can support the effective, efficient and	There was a mixed response to supporting measure to	how they support regeneration and sustainable travel options.
sustainable movement of freight in the District?	improve the highway capacity through Saltaire and Bradford City Centre. Issues regarding the difficulties of increasing capacity at Saltaire and the impact on the World Heritage	<ul> <li>Physical improvement of highway capacity is to be linked to supporting regeneration and</li> </ul>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	Site were highlighted.	sustainable travel options under <b>Policy T7.</b>
Question 5.8: Where in Bradford should car access be restricted and how?	All the options put forward were generally supported for restricting car access.	Noted. Restricting car access through car park <b>Policy TR2</b> and encouraging modal shift from car to public transport, cycling and walking through <b>Policies TR1 and TR3.</b>
Question 5.9:	There was a mixed response to the options presented here;	Noted. Options 1 to 5 have been taken up in
Best ways of reducing impact of traffic	the options have been ranked in order of preference below:	policies TR1, TR2 and TR3.
on Bradford's residents	<ol> <li>Increase funding for non-car modes</li> <li>More space for pedestrians</li> <li>More bus priority measures</li> <li>Make new developments accessible</li> <li>Restrict available parking</li> <li>Provide parking for everyone who wants it</li> <li>There was no support for increasing the road space.</li> </ol>	Providing parking for everyone who wants it or increasing road space will not encourage one of the main elements of the LDF – sustainability – and therefore this has not been taken up in formulating policy.
	Further suggestions included the need for the promotion of multi-car occupancy and use of non car modes.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 5.10A: How do you think that public transport services can be realistically improved?	<ul> <li>Comments included:-</li> <li>Increase funding via Section 106 agreements</li> <li>Increase capacity of public transport</li> <li>Provide public transport 'park and ride' schemes</li> <li>Re-open rail stations at Low Moor, Laisterdyke, Spen Valley Railway from Dewsbury to Bradford (via Low Moor), and the branch to Otley</li> <li>Introduce Tram-train operations between Bradford Forster Square and Shipley</li> <li>Increase initiatives to use public transport modes</li> </ul>	Comments noted; however funding has not been addressed in the Transport Chapter of the Further Engagement Draft document. This issue will be taken up in another part of the LDF. The Council is currently looking to adopt a Community Infrastructure Levy (CIL) which will replace elements of the current Section 106 agreements. <b>Policies TR1 and TR3</b> seeks to increase public transport capacity. There is support for the creation of new rail stations at Low Moor and Laisterdyke in <b>Policy TR1 (D3).</b> The Spen Valley Railway and branch to Otley not mentioned specifically in these policies as they lie outside the Bradford District.
Question 5.10B: Should the Council treat public transport improvements as a higher priority than highway improvements?	Respondents agreed that public transport should be given higher priority than highway improvements.	Noted. Public Transport is given priority under Policy TR3 and highway improvements in Policy TR7 (Transport investment and management priorities) linked to those that fore mostly support regeneration and sustainable travel options.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 5.11: When funding is obtained from new developments (through section 106 agreements) towards non-car modes, should this be spent as a priority on:-	Respondents favoured the following non car modes: promotion of walking, promotion of cycling and cycling facilities and public transport. There was less support for providing accessible public realm. Further suggestions included the mobility impaired and pedestrians.	<ul> <li>Noted. Public transport, walking and cycling are promoted primarily through Policy TR3 (Public Transport, cycling and walking) but also supported through Policies TR1 (Travel Reduction and modal shift), TR2(C &amp; F) (Parking), TR4 (B2 &amp; B5) (Transport and Tourism), and TR7 (Transport investment and management priorities).</li> <li>Assisting the public realm as in Policy TR1 (Travel Reduction and modal shift) supports walking, which would include improving the environment people walk through.</li> </ul>
		Policies TR1(A) (Travel reduction and modal shift) and TR3(B) (Public Transport, cycling and walking), and TR4(B) (Transport and Tourism) promote access to all groups in society (which would include the mobility impaired and pedestrians.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 5.12: Do you think that current maximum parking standards are appropriate or do you think that these should be changed?	There was mixed support in comments relating to parking standards. The general view is that options for reduced parking, or parking based on public transport accessibility and car-free residential developments should occur. Only few respondents supported the need to allow for more levels of parking.	Noted. <b>Policy TR2 (Parking)</b> working towards reduced parking and encouraging parking based on public transport accessibility. Parking standards allow for car-free residential developments but this is only possible in very sustainable locations.
Question 5.13: Where should we provide lorry parks?	There was mixed opinions to this question. Respondents commented that lorry parks should be accessible from main routes and any unofficial lorry parking should be challenged by the authority. However on the other hand, it was suggested that no lorry parks should be provided as it is the responsibility of the lorry operators.	Noted. The encouragement of the development of lorry parks is set within <b>Policy TR6 (Freight)</b> , a comprehensive freight that seeks to lay the framework for development of an integrated freight distribution system. The inclusion of a freight policy in the LDF does not presuppose who will be responsible for carrying out the measures but rather is a realisation of the importance of freight to the Districts economy as well as the need to deal with its environmental impact.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE	
TOPIC PAPER 6: COMMUNITY FACIL	TOPIC PAPER 6: COMMUNITY FACILITIES		
General Comments on	Further clarity and interpretation is needed with regards to	Noted. The Further Engagement Draft document	
Topic Paper 6: Community Facilities	'cultural' & 'community' facilities.	draws attention to the importance of both cultural and community facilities within local communities and as such policies have been formulated to cater for those needs.	
Health Question 6.1: How should the Council ensure that new and existing Health Care facilities are accessible, well serviced by public transportation and promote social inclusion?	There was strong support for the increase in provision of more dispersed health facilities within communities, followed by concentrating facilities where they are most accessible, and large centralised facilities in transport modes. Comments highlighted the need to consider, with health providers, a balance between these options.	Agree. The Council will need to consider with health providers a balance of these options. <b>Policy ID4 (Working with partners)</b> sets out the approach the Council will take when working with health providers. In addition the <b>Sub Area</b> <b>Policies for the City of Bradford (BD1); Airedale</b> (AD1), Wharfedale (WD1) and Pennine Towns and Villages (PN1) identify the approach for new community facilities. Further information is also contained within the Draft Local Infrastructure Plan (2011).	

ΤΟΡΙϹ	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Education Question 6.2: How should the Council ensure that new and existing facilities for education are well served by public transportation?	Respondents supported both options to ensure facilities are accommodated which meets the needs of local communities and located where they are most accessible. Comments also highlighted the need to consider accessibility to and from private schools within the District as well as the needs of 16+ students who travel further.	Agree. The Further Engagement Draft will ensure facilities are accommodated which meets the needs of local communities and located where they are most accessible. See the Further Engagement Draft document and the Draft Local Infrastructure Plan (2011).
Leisure and Open Space Question 6.3: How can the Council ensure that all communities have access to high quality green space and sport and recreation facilities?	There was a mixed response to this question; however respondents generally favoured all the options put forward here. However it was highlighted that Option 1 (protect and enhance all green space) may not be achievable due to development pressures within the District.	Policy EN1 (Open Space, Sports and Recreation) seeks to ensure that all communities have access to high quality green space and sport and recreation facilities and to protect existing open spaces. It identifies circumstances under which exemptions to the policy of protection might be made.
Access to shopping facilities Question 6.4: How should the Council ensure that all sections of the community have access to retail provision?	The majority of respondents supported the need to protect small shops in small villages and communities and to allow small scale retail provision to meet more localised needs in communities. Proposals for expansion or changes to the existing hierarchy need to be supported by an evidence base.	Agree. The Council will be seeking to protect small shops, encourage retail diversity and rural economic growth. The Core Strategy will also support rural diversification. The Retail and Leisure Study (2008) provides the evidence to support the network and hierarchy of centres and detailed centre boundaries and expansion areas.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
		See the Further Engagement Draft document and the Retail & Leisure Study (2008).
Question 6.5: Does the existing hierarchy and policy approach to sustain and enhance these centres best meet people's needs?	There was mixed views about the existing hierarchy and the need to amend it. Generally, the majority of respondents supported the need to protect small shops in small villages and communities and to allow small scale retail provision to meet more localised needs in communities. Proposals for expansion or changes to the existing hierarchy need to be supported by an evidence base.	A network and hierarchy of centres has been informed by the Retail and Leisure Study (2008). This study provides the evidence to support the network and hierarchy of centres and detailed centre boundaries and expansion areas. <b>Policy EC5 (City, Town, District and Local</b> <b>centres)</b> sets out the Council's approach to the provision of services within communities.
Community Uses Question 6.6: How should the Council ensure that all sections of the community have access to a range of local community and cultural facilities?	The majority of respondents supported the option to protect existing facilities from loss, with fewer respondents supporting the need to concentrate new community facilities where they are most accessible. A number of respondents highlighted the need for policy to protect the loss of public houses and for it to make reference to cultural facilities which are within the District.	Agree. National Planning Policy (PPS4) seeks to protect and enhance existing facilities such as public houses and neighbourhood shops. The Council will proactively support the provision of cultural; facilities (places of worship, community centres etc in areas that are most accessible. <b>Policy EC5 (City, Town, District and Local centres)</b> sets out the Council's approach to the provision of services within communities.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
TOPIC PAPER 7: ENVIRONMENT		
General Comments on Topic Paper 7: Environment	Natural England considered the paper to present a generally sound base from which an environmentally sustainable suite of policies can be developed. However it was also recommended that the Council include an overarching climate change policy and introduce specific policies designed to deliver greater production of renewable energy within the Core Strategy DPD. Further comments consisted of the following points below:	Noted. The Further Engagement Draft document includes <b>Strategic Core Policy SC2 (Climate</b> <b>Change and resource use)</b> which is an overarching policy relating to climate change and resource use. <b>Policy EN6 (Energy)</b> seeks to promote renewable energy, as does <b>Policy HO9</b> <b>(Housing Quality)</b> which sets out requirements for sustainable housing design.
	The Council should consider taking a lead on sustainable design; policy should be strategic and high level and distinctive to the district.	Noted. <b>Policy ID2 (Development Management)</b> provides the strategic level design policy which can be used in the determination of planning applications.
	The paper does not draw out subtle changes in S40 and S41 of the Natural Environment and Rural Communities Act 2006 – the duty for biological conservation.	<b>Policy EN2 (Biodiversity and Geodiversity)</b> seeks to protect area within the District of importance to biodiversity.
	Section 3.13 & Options – Strategic conservation and design policy should be specific to Bradford – needs to consider access for all and crime reduction issues	Policy EN3 (Historic Environment) provides the strategic policy for the conservation of the historic environment. Policy ID2 (F)(Development Management) seeks to ensure that development

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
		proposals are designed to ensure a safe environment is created.
	Section 3.25 & Options – A positive approach to renewable, as set out in PPS22 should be followed.	<b>Policy EN6 (Energy)</b> seeks to promote renewable energy, as does <b>Policy HO9 (Housing Quality)</b> which sets out requirements for sustainable housing design.
	Section 3.27 & Options – The Core Strategy should refer to Air Quality Management Areas (AQMAs) . There were four declared in the District in 2006.	Air quality issues are addressed in <b>Policy EN8</b> (Environmental Protection) and in Strategic Core Policy SC2 (Climate Change and resource use) relating to Climate Change.
	Section 3.30 - The Core Strategy should discourage development in areas where sewerage infrastructure or water supply is either unavailable or at capacity.	The Council has been liaising with Yorkshire Water to discuss water supply and sewage infrastructure. The outcomes of these meetings are reflected in the approach taken within the Further Engagement Draft Report. See Local Infrastructure Plan for further information. <b>Policy ID4 Working with</b> <b>Partners)</b> sets out how the Council will work with stakeholders to ensure infrastructure is in place.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	Section 3.31 - Disagreement with the phrase 'It sets out a Sequential Test that aims to match the type of development to the degree of flood risk'. This would be more appropriately described as the Exception Test.	The description of the sequential test has been amended within the Further Engagement Draft report.
	West Yorkshire Ecology advises the section to be re-titled 'Biodiversity and Geological Conservation' – links better to PPS 9.	Noted. This policy has been amended to <b>Policy</b> EN2 Biodiversity and Geodiversity.
	Respondents highlighted the need for various pieces of evidence and data to inform the policy development, such as the Strategic Flood Risk Assessment	All policies within the Further Engagement Draft document have been updated according to the most recent evidence base publications.
Biodiversity	Responses indicated strong support for each of the options	Noted. Policies EN2 (Biodiversity and
Question 7.1: While the overall aim must be to protect the biodiversity resource,	provided in line with PPS9, with the focus being on national and international sites; regional priorities for habitat restoration; key habitats and species in Bradford's Local Biodiversity Action Plan and ensuring development has	<b>Geodiversity)</b> relating to biodiversity and the natural environment seek to address the concerns highlighted during the consultations.
where should local policy support and resources for enhancement be	minimal impact on the overall biodiversity resource.	The definitions of strategically important habitats have been amended in the text relating to
focused?	The options indicate three regional priorities for habitat restoration and creation, which do not tie in closely with the four habitat action plans in the local BAP, in-bye grassland, hedgerows, river corridors and upland woodland. The three	biodiversity and in the justification for the policy relating to the natural environment in accordance with the suggested modification.

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TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
h	nabitats identifies within the options have been suggested to	
b	be modified to:	
c	Upland habitats, including upland heath, blanket bog	
	and wet or unimproved grassland on the moorland	
	fringe;	
c	Floodplain habitats including rivers, standing open	
	water, bog, fen, wet grassland, species rich unimproved	
	grassland and wet woodland;	
c	Ancient and semi-natural woodland.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Landscape	Landscape character is key component of local	Policy EN4 (Landscape) requires proposals to
Question 7.2: Using the Landscape Character assessments as a framework, where should policy emphasis and resources be focused?	distinctiveness and helps frame 'sense of place'; as a result there was a mixed response to this question with each option receiving support. Respondents agreed that resources should be focused: in landscapes with strong historic and cultural associations that attract visitors; derelict and despoiled urban fringes, and provide mitigation measures where development is proposed and retain the	make a positive contribution towards the management and enhancement of the diversity of landscapes within the Bradford District. The importance of cultural associations, historic elements in the landscape and the setting of settlements and heritage assets is noted in the policy.
	status quo elsewhere.	Strategic Core Policy SC6 (Green
	Natural England raised concerns about prioritising one landscape over another and it was noted that policy needs to reflect the importance of landscapes of cultural and historic significance.	<b>Infrastructure)</b> sets out the approach to green infrastructure within the District.
	Policy should consider the influence of work undertaken on green infrastructure at the regional level and importance of access land covered by Countryside and Rights of Way (CROW) Act for countryside recreation. Both reflect importance of countryside around urban area.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Heritage Assets and Built Form Question 7.3: How should priorities be determined for the protection and management of Bradford's heritage assets?	The majority of respondents agreed that priorities should be determined according to a combination of options, including against the Conservation Area Assessments, Appraisals and the Listed Building at Risk survey. It was noted by a respondent that Saltaire is an obvious priority for the protection and management of Bradford's heritage however, this should not be at the expense of other heritage assets, therefore a broad approach would be supported.	Comments noted. <b>Policy EN3 (Historic</b> <b>Environment)</b> seeks to provide locally specific heritage guidance to strengthen protection, enhancement and management of the historic environment assets within the District. The policy encompasses all heritage assets, their protection, enhancement and management.
Question 7.4: What Should be the overall approach in the Core Strategy to achieving high standards of design for new developments?	The need to aim for development that respects and reflects its context and is accessible to all was supported by the majority of respondents. Support was also given to identifying distinct areas where particularly high standards of design would need to be met, whether these be Conservation Areas, Bradford City Centre or Neighbourhood Renewal Areas. It was supported that high standards of design and innovation also be applied to individual buildings.	Noted. Policy ID2 (Development Management) sets out the Council approach to achieving high quality design within the District. Policy EN3 (Historic Environment) sets out the Councils strategic approach for the conservation and enhancement of all heritage assets. This policy could potentially be expanded through a Supplementary Planning Document which would cover the issue of conversions of exiting buildings.
	This policy should also cover the conversion of existing buildings of heritage value within the District.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Sustainable Building Design Question 7.5: In framing strategic policy or sustainable design, which approach should the council favour?	There was strong support for sustainable design of buildings from majority of organisations who responded including the Home Builders Federation (HBF). The majority of respondents favoured focusing efforts on targeting local areas within which to test the application of particular aspects of sustainable design e.g. requiring green roofs for development on the edges of settlements or sustainable urban drainage schemes for areas where infrastructure is under pressure. The HBF's view is that local standards should be based around different levels in nationally set Code for Sustainable Homes. One respondent disagreed with the options put forward.	Policy HO9 (Housing Quality) ensures development will be accessible to all by requiring that all new housing is built to Lifetimes Homes Standards from 1st April 2012. This requirement will help meet the strategic challenge of providing for a rapidly increasing elderly population within the District. Lifetime Homes are ordinary homes incorporating 16 Design Criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life. Newly proposed residential schemes will also be assessed against Building for Life criteria.
Energy Question 7.6: How supportive should the policy context be towards the development of renewable energy sources?	All respondents agreed that the framework should be very supportive with aspirational targets aimed at raising Bradford's profile as a leader in 'green' issues. It was noted that the LDF should encourage and promote all forms of renewable energy and include a policy that new development should be expected to provide at least 10% of their energy requirements from onsite renewable energy	Policy HO9 (Housing Quality) ensures that all new residential development will meet the highest possible sustainable design and construction standards (through requiring that certain levels of the Code for Sustainable Homes are met during certain time periods). In this policy, the Council also outlines that it may require higher standards of

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	generation. The Environment Agency and the Local	sustainable design and construction to be achieved
	Environment Partnership favour a requirement for increasing	on certain sites in certain areas where it is feasible
	proportions of on-site renewable energy.	and/or viable to do so. New developments of more
		than 10 dwellings will also be required to obtain at
	The Regional Assembly point out Bradford's indicative	least 10% of their energy from decentralised and
	renewable energy target of 10.7MW in draft RSS. However,	renewable or low-carbon sources, unless, having
	others express concerns about how reaching targets	regard to the type of development involved and its
	dependant on large-scale wind energy generation can be	design, this is not feasible or viable.
	reconciled with protection of unique landscapes and setting	la relation to renovable on error to reate. Deliev
	of historic settlements, in particular the SPA.	In relation to renewable energy targets, <b>Policy</b>
		EN6 (Energy) seeks to promote low carbon and
	BWEA and the Environment Agency recommend the	renewable energy whiles ensuring that assessment
	inclusion of a discrete policy on sustainable design and	of the environmental, economic and social impacts
	construction. BWEA strongly urges the Council to include a	are carried out.
	prescriptive micro-generation policy.	In relation to commercial buildings, Policy EC4 (I)
		(Sustainable Economic Growth) requires that
		new developments of more than 1000 sq metres of
		non residential floorspace should secure at least
		10% of their energy from decentralised and
		renewable or low carbon sources and meet
		'BREEAM Very Good' standards unless, having
		regard to the type of development involved and its
		design, this is not feasible or viable.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Water Resource and Flood Risk Question 7.7: In seeking to strike a balance between encouraging regeneration and reducing flood risk, which factors are most important?	The majority of respondents supported the Council in requiring high standards of flood risk assessment from developers and insisting on restrictions on intensity, form and type of development, even where this risks slowing down the process of regeneration. Support was given to flood risk being an important issue when determining the location of development, even if this means building on extensive areas of Greenfield land. The approach to flood risk should be determined according to PPS25 and the influence of the sequential approach to determining allocations.	<ul> <li>Policy EN7 (Development and Flood Risk) sets out a pro-active approach to the reduction and management of flood risk within the Bradford District.</li> <li>The flood risk policy supports Sustainable Urban Drainage Schemes (SUDS) and putting the onus on developers to demonstrate why SUDS are not technically feasible if not being used.</li> </ul>
	The RSPB and Yorkshire Water strongly support use of sustainable urban drainage systems (SUDS) to reduce impact of new development on flood risk. Onus should be put on developers to demonstrate why SUDS are not technically feasible if not being used.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Aggregates	The majority of respondents supported the need to examine	Policy EN12 (Minerals Safeguarding) seeks to
Question 7.8: How should the LDF contribute to meeting the regions need for aggregates?	the requirement for secondary aggregates and maximising their use where appropriate. It was highlighted that the Regional Assembly draws attention to guidance to be offered by Regional Sand and	minimise production of crushed rock aggregates within the District, partly to allow demand for low- specification aggregates to be met by recycled and secondary aggregates.
	Gravel Study, to be completed by the end of 2007.	Policy EN11 (Sand, Gravel, Fireclay and Coal Supply) provides a presumption in favour of sand and gravel extraction within the area of search as a response to the sand and gravel undersupply issues which were highlighted by the sand and gravel research reports commissioned by the Regional Assembly.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Blockstone Question 7.9:	Responses indicated that the Council should lobby the surveys to be undertaken at the regional level to obtain	A local survey of building stone and aggregates was undertaken in 2010 and further surveys are
How should the LDF deal with the supply of Blockstone?	factual information on blockstone, reserves, supply and demand. Further comments highlighted that policy should also provide an appropriate framework for the identification and protection of both existing and formally worked sites.	intended to be undertaken annually. Additionally a BGS/ English Heritage Strategic Stone Study is currently underway in the Yorkshire and Humber Region.
		Policy EN10 (Sand Stone Supply) is intended to
		safeguard sandstone resources and active,
		dormant, inactive and historic quarries from
		sterilisation by other forms of development.
TOPIC PAPER 8: WASTE MANAGEM	IENT	
General Comments on	There was general support for the minimisation of	Comments noted. The issues raised with regards
Topic Paper 8: Waste Management	environmental impact and sustainable energy production, along with the move towards self sufficiency.	to waste data and evidence has been addressed in the following consultation documents:
	Respondents commented that the strategy for waste management should utilise the data and information available on arisings, current capacity, any shortfalls having regard to any changes needed in the types of facilities in the light of Government guidance. Reference should be made to the Yorkshire and Humber Regional Technical Advisory	<ul> <li>Waste Management DPD: Issues and Options (Nov 2009);</li> <li>Waste management DPD: Preferred Approach (Jan 2011); and the</li> <li>Core Strategy Waste Management Preferred Approach Policies (Jan 2011).</li> </ul>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	Body (RTAB) report.	Following public consultation on the Waste Management polices, the Preferred Approach report contains the revised waste policies.
Waste Reduction (minimising) Question 8.1: How can the Waste DPD promote waste minimisation and reuse?	Comments received supported all the options put forward for this question, particularly in terms of requiring or encouraging developers to incorporate innovative ideas into schemes and outline how waste will be reduced. Further comments recognised the need to maximise the availability of suitable sites as recycling centres, increase the variety of materials that can be recycled at each site, and increase provision for central composting of food wastes, especially for those in high density housing.	<ul> <li>Comments noted. The issues raised with regards to waste reduction has been addressed in the following consultation documents:</li> <li>Waste Management DPD: Issues and Options (Nov 2009);</li> <li>Waste management DPD: Preferred Approach (Jan 2011); and the</li> <li>Core Strategy Waste Management Preferred Approach Policies (Jan 2011).</li> <li>Policy EN13 (Waste Management) sets out a waste hierarchy of how waste will be managed. The first stage of this is 'waste prevention' which seeks to avoid the creation of waste in the first instance.</li> </ul>
Waste Recycling Question 8.2:	There was strong support from respondents for the Council to increase recycling targets and that the waste hierarchy approach is promoted to achieve the waste management	Comments noted. The issues raised with regards to waste recycling has been addressed in the

#### TOPIC SUMMARY OF COMMENTS COUNCIL'S RESPONSE targets. Further comments highlighted that there should be following consultation documents: How can the Waste DPD help assist in a commitment to encouraging, in the first instance, the reuse the Bradford District in reaching its of existing buildings rather than allowing them to be Waste Management DPD: Issues and Options recycling targets set by the (Nov 2009); demolished. Government? Waste management DPD: Preferred Approach There was a mixed response to require/encourage (Jan 2011); and the developers to include innovative ideas for waste reduction Core Strategy Waste Management Preferred into schemes as there were concerns regarding the amount Approach Policies (Jan 2011). of space in layouts for the segregation and recycling of Policy EN13 (Waste Management) sets out a different waste types. Furthermore it was considered to be waste hierarchy of how waste will be managed. ambitious to expect that businesses to foot the bill for setting The first stage of this is 'waste prevention' which up schemes to dispose of business waste. seeks to avoid the creation of waste in the first instance. There were suggestions for the Waste Management DPD these included: sites should be allocated as Civic Amenity Sites to encourage recycling and additional sites should be allocated for recycling paper, glass and aggregates. Waste allocations should be placed as not to impact on designated wildlife sites, flood risk/floodplain functionality and natural resources.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Waste Energy Recovery Question 8.3: What additional waste management facilities are needed for the different types of waste that are produced in the Bradford District?	The majority of respondents agreed that the Council should require developers to demonstrate they have taken the waste hierarchy into account, and using re-use and recycle before using waste energy production. Furthermore, support was given to working with adjoining Local Authorities to ensure sites are identified. The allocated of waste sites should be for a range of facilities, whilst also specifying specific waste facilities on sites.	Noted. The issues raised with regards to additional waste facilities for different waste streams have been addressed within the Waste Management DPD: Preferred Approach (January 2011), Chapter 3, page 12-34.
Question 8.4: Are there any types of waste for which there are sufficient facilities?	There was no response to this question.	Noted.
Waste Disposal Question 8.5: In which areas of the Bradford District should these waste management facilities be located?	Respondents commented that waste facilities should be located locally within the District. However there was general concern if such facilities are located in close proximity to residential areas. Any such facilities would need to be carefully designed and landscaped in relation to the surrounding environment.	Concerns noted. The issue raised with regards to the location of waste facilities has been addressed within the Waste Management DPD: Preferred Approach (January 2011), Chapter 5, page 43-60. The site selection criteria take account of the proximity to other sensitive uses, such as housing, along with the visual and landscape impact of
		addresses during site selection and allocation.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Question 8.6: Should we identify the major waste facilities that may be required and allocate sites for these?	Responses agreed that the Council should identify major waste facilities that may be required within the District and allocate sites for these.	Noted. The Waste Management DPD: Preferred Approach document and the Site Assessment Report (January 2011) explains the rationale of identifying sites and put forward a number of sites for consultation.
Question 8.7: Should we have a site selection criteria as well as identifying the major waste facilities?	The majority of respondents supported the need for a site selection criteria as well as identifying major waste facilities. It was commented that this approach should be based on specific sites allocated to facilitate a network of strategic sites across the District.	Noted. The Council has outlined a site selection criteria which is set out within the Waste Management DPD: Preferred Approach document under <b>Policy W6</b> .

## **APPENDIX 4:**

ISSUES AND OPTIONS CONSULTATION - SUMMARY OF COMMENTS RECIEVED TO INITIAL SUSTAINABILITY APPRAISAL

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
INITIAL SUSTAINABILITY APPRAI	SAL	
General comments to the Initial Sustainability Appraisal	West Yorkshire Archaeology raised serious concerns that the historic environment was not featured within the Sustainability Appraisal and urge that this is considered in any future draft document.	Agree. The Council will ensure that the historic environment is fully considered within any future Sustainability Appraisal assessments. Also to note, the Council have since commissioned Entec / Amec to carry out an independent SA of the emerging plan.
	Yorkshire Forward suggested that an additional objective relating to 'support and collaboration between educational establishments, business and industry' is included within the appraisal to achieve a more balanced approach to economic impacts.	Noted. The sustainability appraisal will have regard to the need to support education and businesses alike and the need to develop the skills base of the Bradford District.

## **APPENDIX 5:**

LIST OF ORGANISATIONS AND BODIES CONSULTED UNDER REGULATION 25 – FURTHER ISSUES AND OPTIONS

## References in brackets are to the Statement of Community Involvement – Appendix 4

## **Specific Consultation Bodies**

- British Telecom
- English Heritage
- Environment Agency
- Government Office for Yorkshire & The Humber
- Highways Agency, Yorkshire & Humber
- Natural England
- Natural England West Yorkshire Team
- Network Rail
- North West Regional Assembly
- North West Regional Development Agency
- Telewest Communications
- Transco (North of England)
- Yorkshire and Humber Regional Assembly
- Yorkshire Electricity
- Yorkshire Forward
- Yorkshire Water Services Ltd

## Specific Consultation Bodies (Adjoining Local Planning Authorities)

Calderdale Metropolitan Borough Council

Craven District Council

Harrogate District Council

Kirklees Metropolitan Council

Lancashire County Council

Leeds City Council

North Yorkshire county Council

Pendle Borough Council

Wakefield District Council

## Specific Consultation Bodies (Town and Parish Councils in Bradford District)

- Addingham Parish Council
- Baildon Parish Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council

- Denholme Town Council
- Harden Parish Council
- Haworth, Cross Roads & Stanbury Parish Council
- Ilkley Parish Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Parish Council
- Sandy Lane Parish Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council

## Specific Consultation Bodies (Town and Parish Councils in Neighbouring Authorities)

- Bradleys Both Parish Council
- Cononley Parish Council
- Cowling Parish Council
- Denton Parish Council
- Draughton Parish Council
- Drighlington Parish Council
- Farnhill Parish Council
- Gildersome Parish Council
- Glusburn Parish Council
- Laneshaw Bridge Parish Council
- Middleton Parish Council
- Nesfield with Langbar Parish Council
- Otley Town Council
- Sutton-in-Craven Parish Council
- Trawden Forest Parish Council
- Wadsworth Parish Council
- Weston Parish Council

## **General Consultation Bodies**

- A A Planning Services
- Accent Group
- Aireborough Planning Services
- Aldersgate Estates Ltd
- Al-Farouq Associates
- Allison And MacRae

- Anchor Trust
- Andrew Martin Associates
- Arnold Laver
- Asquith Properties
- Associated Waste Management
- Atkins Global

- Baildon Community Link
- Banks Long & Co
- Barratt Homes
- Barton Willmore Planning Partnership
- BCHT
- BCHT (North)
- Beckwith Design Associates
- Bedminster International
- Ben Bailey Homes
- Ben Rhydding Action Group/Save Us
   Pub
- Berry And Marshall (Bolton Woods)
   Limited
- Biffa Waste Services
- Bioregional Quintain Developments
- Blue Room Properties
- Bob Jarman
- Bolsterstone Plc
- BOPA
- Bradford & District Tenants & Residents Federation - Alex Brown
- Bradford Action for Refugees
- Bradford and District Older People's
   Alliance
- Bradford and District Senior Power
- Bradford Cathedral
- Bradford Cathedral Centre
- Bradford Community Housing Trust
- Bradford District Chamber of Trade
- Bradford Equalities
- Bradford Night Stop
- Bradford Rail Users Group
- Bradford Trident
- Bradford Women's Aid Sally Deane
- Bradnet
- Braithwaite and Guardhouse
   Community Association
- Bramley Homes
- Brewster Bye Architects
- Mr Bruce Barnes
- Bullroyd Allotments Association

- Burley Parish Council
- Burnett Planning & Development
- C. V. Barton
- Caddick Development
- Calder Architectural Services Limited
- Campaign For Real Ale
- Canterbury Residents Group
- Carter Jonas John Goodwin/Kate Broadbank
- CB Richard Ellis Ltd
- Chris Thomas Ltd
- City Lofts Development
- Clear Designs
- Commercial Estates Group
- Costco Ltd
- Countryside Properties (Northern) Ltd
- Covanta Energy Ltd
- Craven Design Partnership
- Dacre Son And Hartley
- David Beighton Architects
- David Wilson Estates
- David Wilson Homes Northern
- Depol Associates
- DevPlan UK
- Dialogue Communicating Planning
- DLA Architecture
- Donaldsons
- DPDS Consulting Group
- Drawtech
- Drivas Jonas
- Drovers Way Resident Group
- DTZ Pieda Consulting
- Dunlop Haywards Planning
- Eddisons
- Eddisons Commercial
- ENERGOS
- Environment Partnerships
- Eric Barraclough
- Eric Breare Design Associates
- Erinaceous, Planning
- F And W Drawing Services

- F M Lister & Son
- Fairport Engineering Ltd
- Farrell and Clark
- Firebird JVC
- Firstplan
- Four Square Drawing Services
- Friends of Lister Park
- G R Morris Town Planning Consultant
- Garbe Real Estate Ltd
- George Wimpey Northern Yorkshire
   Ltd
- Giggleswick School
- Goldfinch Estates Ltd
- GP Planning And Building Services
- Grange Technology College
- Gregory Properties
- GVA Grimley
- H. Bosomworth
- Habinteg Housing Association
- Hallam Land Management
- Halliday Clark
- Ham Group
- Hanover Housing Association
- Hartley Planning Consultants
- Haworth Road Neighbourhood
   Association
- Hayes Dobson Developers Limited
- Headrow Housing Group
- HJ Banks and Co Ltd
- Holme Christian Care Centre Ltd
- Home Housing
- Horton Housing Association
- Housing 21
- How Planning
- Hurstwood Group
- Ilkley Design Statement Group
- Indigo Planning Ltd
- J C Redmile
- J O Steel Consulting
- J R Wharton Architect
- J. Addie

- J. Hill
- Jeff McQuillan Consulting
- Jeff Redmile
- Jobs @
- John Hornby & Sons Ltd
- Jones Homes (Northern) Ltd
- Keighley Community Transport
- Kelly Architectural Design
- Khidmat Centre
- Land & Development Practice
- Landtask
- Langtree
- Leith Planning Ltd
- Little Horton Neighbourhood Action
   Group
- Littman Robeson
- MAC Group
- Manningham Housing Association
- Manor Property Group
- Marilyn Brichard
- Mark Brearley & Co Chartered Surveyors
- Martin Spiers
- Matthew Brooke
- McGinnis Development
- MENCAP
- Metriban Khan
- Miller Homes
- Miller Strategic Land
- Mineral Planning Group
- Mr G E Tattersall
- Mr J P Lloyd
- Mr Kurt Kunz
- Mr T Bendrien
- Mrs B Smith
- Nashayman Housing Association
- Nathaniel Lichfield & Partners
- New Horizons in the Community
- New Mason Properties
- Newlands Community Association

Core Strategy DPD

- North British Housing Association -Veronica Carrapiett
- North Country Homes Group Ltd
- Nuttall Yarwood And Partners
- Oltergraft Planning Services
- Owlet Children and Family Centre
- Mr P. M Coote
- PACT
- Parkgate Design
- Patchett Homes Ltd
- Paul & Co
- Peacock and Smith
- Penny Trepka
- Piccadilly Estate Management Ltd
- Planet Design Group
- Planning Potential
- Planning Prospects Ltd
- Plot of Gold Ltd
- Pondside Neighbours Group
- PPG Land Ltd
- Priority Sites Ltd
- Purearth PLC
- Rafake
- Rev. John Nowell
- Robinson Architects
- Royds (J B Scholfield)
- RPS Planning
- Saltaire Village Society
- Sanctuary Housing Association
- Sanderson & Weatherall
- Save Horsfall Playing Fields
- Shirley Manor Primary School
- Simon Estates Ltd
- Sita UK
- Spawforth Planning Associates
- Spawforths
- Springwood Primary School
- St Aidan's Presbytery
- St James Securities Ltd
- St Marys Residents Association

- Star Keys Estate Agents, Valuers & Surveyors
- Sutton Community Association
- SWG Planning Services
- Taylor Woodrow Developments Ltd
- TEG Environmental Ltd
- The Abbeyfield Bradford Society
- The Homekey Project
- The Land & Development Practice
- The Moravian Manse Rev Sarah Groves
- The William Sutton Housing
   Association
- Thomas Crompton Cranmore Farm
- Thornbury Centre
- Thornbury Gardens and Allotment
   Association
- Tom Jones
- Tony Kilcoyne
- Touchstone Rev Geoff Reid
- Tribal MJP
- Trinity Methodist Church
- Turner Associates
- United Co-operatives Ltd
- Urban Splash
- Veolia Environmental
- Victor Road Community Project
- Vincent and Gorbing Ltd
- VJ Associates
- Waddington Recycling Ltd
- Walton & Co
- Waste Recycling Group
- Webb Seeger Moorhouse Partnership Limited
- West Register Realisations Ltd
- Westfield Shoppingtown Ltd
- Wharfedale Friends of the Earth
- Whitebay Ltd
- Woodhall Planning & Conservation
- Working Architects Co-Op Limited
- Yorwaste Ltd

Core Strategy DPD

## **Other Consultees**

- Age Concern
- Ancient Monuments Society
- British Wind Energy Association
- Council for British Archaeology
- CPRE
- Future Energy Yorkshire
- Ilkley Civic Society
- Inland Waterways Association
- METRO
- National Offender Management Service / HM Prison
- Npower Renewables
- Ramblers Association
- Rural Housing Enabler

- Society for the Protection of Ancient Buildings
- The Abbeyfield Society
- The Emerson Group
- The Garden History Society
- The Georgian Group
- The Housing Corporation
- The Mall Corporation
- The Theatres Trust
- The Twentieth Century Society
- The Victorian Society
- Yorkshire Gardens Trust
- Yorkshire Housing Limited

# Other Consultees (List of other Organisations and Groups Consulted that are not identified in the Planning Regulations)

- 90 Bradford Councillors
- 5 Members of Parliament for the Bradford, Keighley and Shipley Constituencies
- Communities of Interest
- Yorkshire Planning Aid
- CBMDC Bradford Access Action
- CBMDC Mobility Planning Group
- CBMDC DDA Task Team
- CBMDC Children's Services
- CBMDC Early Years and Childcare Service
- CBMDC Environmental Protection
- CBMDC Neighbourhood Support Service
- CBMDC Private Sector Housing
- CBMDC Sport and Leisure Service

During the Further Issues and Options stage, the LDF Group worked in partnership with the Council's Neighbourhood Development Services to engage with the wider community. Initiations to participate within this consultation were extended by the Neighbourhood Development Services to:

- 790 Residents
- 345 people on the Neighbourhood Forum database
- 49 Voluntary and Community Groups
- Events were advertised on the following websites: BD18; Baildon Community; Saltaire Village Society
- And on Shipley Community Radio.

## APPENDIX 6: ACTIONS AND EVENTS DURING THE FURTHER ISSUES AND OPTIONS CONSULTATION

6.1 This summary of the Further Issues and Options Consultation outlines the responses collected during the consultation undertaken in early 2008. It sets out these responses through the methods they were collected.

## Stakeholder Workshops

6.2 Five stakeholder workshops were held within different parts of the district in order to engage with as many people as possible during the consultation period. The events took a similar form to the previous events. An introductory PowerPoint presentation and a scene setting DVD was shown which provided the background to the LDF and the Core strategy, in particular the four spatial options being consulted on. Attendees were split into workshops groups to allow more focused discussions on the four spatial options. During these events Area Co-ordinators were on hand to help to chair and facilitate events where necessary.





Facilitated workshop groups

6.3 The events were advertised in the local press, in the LDF Groups newsletter and on the Council's website. In total 161 people attended these events.

Date	Time	Venue	No of Attendees
5 <sup>th</sup> March 2008	6 - 9pm	Thornton Primary School, Bradford	22
8 <sup>th</sup> March 2008	10am - 1pm	Victoria Hall, Saltaire	50
12 <sup>th</sup> March 2008	1 - 4pm	Thornbury Centre, Bradford	33
15 <sup>th</sup> March 2008	10am – 1pm	Riddings Hall, Ilkley	22
19 <sup>th</sup> March 2008	6 - 9pm	Temple Row Centre, Keighley	34
		TOTAL:	161

## **Outcomes of the Stakeholder Workshops**

6.4 Below is a summary of the key points raised during each of the public consultation events. The comments made reinforce key issues and consideration which the Council are committed to achieving, such as the protection of communities, biodiversity, the environment, and the need for affordable homes, excellent infrastructure and employment opportunities.

AREA WORKSHOP EVENTSHOPS	SUMMARY OF COMMENTS	
	<ul> <li>Need dispersal of development to avoid overcrowding in the inner city.</li> </ul>	
	<ul> <li>Need to develop Brownfield sites more</li> </ul>	
	<ul> <li>Infrastructure needs to be in place.</li> </ul>	
	<ul> <li>Need to provide affordable housing.</li> </ul>	
	<ul> <li>Villages have already grown in recent years</li> </ul>	
Thornton Event	<ul> <li>Need to protect wildlife.</li> </ul>	
	<ul> <li>There should be live/work units in villages.</li> </ul>	
	<ul> <li>Need to consider environmental constraints.</li> </ul>	
	<ul> <li>Good design is the key.</li> </ul>	
	<ul> <li>Need the right type of housing – concern over the number of apartments being built.</li> </ul>	
	<ul> <li>Prefer development in villages than over intensification in the urban area.</li> </ul>	
	<ul> <li>Need to keep villages separate.</li> </ul>	
	<ul> <li>Should infrastructure be focused or dispersed – depends on where development is located.</li> </ul>	
Saltaire Event	<ul> <li>Need to protect urban wildlife</li> </ul>	
	<ul> <li>Need to protect the Green Belt</li> </ul>	

AREA WORKSHOP EVENTSHOPS	SUMMARY OF COMMENTS
	<ul> <li>Flood risk is an issue</li> </ul>
	<ul> <li>Town centre investment is needed</li> </ul>
	<ul> <li>Need better connections between Keighley and Lancashire</li> </ul>
	<ul> <li>If Bingley is designated a Principal Town, it would change its nature</li> </ul>
	<ul> <li>Esholt could be more integrated through the Growth Point</li> </ul>
	<ul> <li>Development will help sustain settlements</li> </ul>
	Need housing that people want – not just apartments
	<ul> <li>Need Shipley Eastern Link Road in place in Esholt or Canal Road Corridor is to be developed.</li> </ul>
	<ul> <li>Need high quality design</li> </ul>
	<ul> <li>There could be a new town between Leeds and Bradford</li> </ul>
	<ul> <li>Need green corridors.</li> </ul>
	<ul> <li>Need infrastructure in place to cater for increased population</li> </ul>
	<ul> <li>Retain character of areas</li> </ul>
	<ul> <li>Need accommodation for the elderly.</li> </ul>
	<ul> <li>Should make better use of railways.</li> </ul>
Bradford Event	<ul> <li>Need to take into account areas that flood.</li> </ul>
	<ul> <li>Should develop more cycle routes.</li> </ul>
	<ul> <li>Need green spaces</li> </ul>
	<ul> <li>Need to minimise Green Belt releases</li> </ul>
	<ul> <li>Employment should be located so as not to attract employees from Leeds but for Bradford residents.</li> </ul>

AREA WORKSHOP EVENTSHOPS	SUMMARY OF COMMENTS
	<ul> <li>Development in villages will be needed to support services.</li> </ul>
	<ul> <li>Need employment and housing in close proximity to reduce commuting.</li> </ul>
	<ul> <li>Development could be used to regenerate some areas.</li> </ul>
	<ul> <li>Should be more brownfield development.</li> </ul>
	<ul> <li>Need to ensure a good mix of housing.</li> </ul>
	<ul> <li>There is a poor road network linking Principal Towns which will need improving</li> </ul>
	<ul> <li>Options 3 and 4 provides the housing to cater for economic growth in the Leeds/Bradford Corridor.</li> </ul>
	<ul> <li>Need to have spaces for travellers.</li> </ul>
	<ul> <li>Infrastructure is a key issue</li> </ul>
	<ul> <li>No joining up of settlements</li> </ul>
	<ul> <li>Locate employment closer to housing</li> </ul>
	<ul> <li>Need development to prevent dormitory towns forming</li> </ul>
	<ul> <li>Protect existing employment areas</li> </ul>
llkley Event	<ul> <li>Loss of character and identity is a concern</li> </ul>
	<ul> <li>Limit intensification</li> </ul>
	<ul> <li>Protecting areas from flooding</li> </ul>
	<ul> <li>Affordability is an issue</li> </ul>
	<ul> <li>Some areas are constrained by topography</li> </ul>
	<ul> <li>Ilkley should be a Local Service Centre</li> </ul>
	<ul> <li>Need to retain access to the countryside</li> </ul>

AREA WORKSHOP EVENTSHOPS	SUMMARY OF COMMENTS
	<ul> <li>Investment and encouragement of sustainable transport</li> </ul>
	<ul> <li>Bradford should be the centre for growth.</li> </ul>
	Take account of geographical features
	<ul> <li>Protect tourist areas</li> </ul>
	<ul> <li>Build communities not housing estates</li> </ul>
	<ul> <li>Need to retain separation between communities</li> </ul>
	<ul> <li>Should create a new town</li> </ul>
Keighley Event	<ul> <li>Need to support small industry in rural communities</li> </ul>
	<ul> <li>Need infrastructure capacity to be increased</li> </ul>
	<ul> <li>Development is needed in some areas to sustain communities</li> </ul>
	<ul> <li>Some Local Service Centres are already overdeveloped.</li> </ul>
	<ul> <li>Need jobs in service industries, not manufacturing which is declining.</li> </ul>
	<ul> <li>Need to instil a behavioural change regarding commuting and modes of transport.</li> </ul>

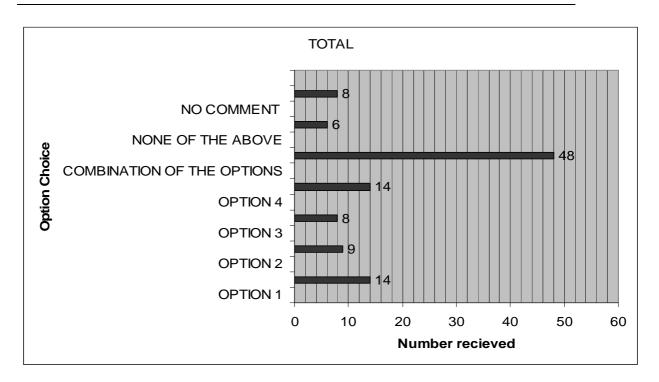
**Spatial Option Forms** 

- 6.5 The focus of this consultation on four spatial options allowed for more focused and stimulated discussions with the wider community regarding the future development of the District. One of the gauging factors of public opinion was to determine which option, out of the four or potentially a combination of the options, the public favoured, or would like to see as the Council's proposed approach to development until 2026.
- 6.6 A Spatial Option Form was produced for use within the Stakeholder Workshops for attendees to express their thoughts and opinions on the spatial options presented. The forms allowed people to select which option they preferred and allowed space for comments. This enabled the LDF Group to gauge public opinion following the workshop events.

**Outcomes of the Spatial Option Form** 

6.7 In total 107 completed Option forms were returned at the consultation events.
Respondents had mixed views regarding the four spatial options for development; however the majority stated they would prefer a 'combination of the four options'.
Table 1 below highlights the outcomes of the option forms from each event which highlights the general censuses of the spatial options.

Outcomes of the Spatial Option Forms						
	THORNTON	TON SALTAIRE THORNBURY		ILKLEY	KEIGHLEY	
	5 March 08	8 March 08	12 March 08	15 March 08	19 March 08	TOTAL
OPTION 1	2	9	0	1	2	14
OPTION 2	3	0	5	0	1	9
OPTION 3	3	0	1	3	1	8
OPTION 4	1	2	0	7	4	14
COMBINATION OF THE OPTIONS	9	14	2	14	9	48
NONE OF THE ABOVE	0	3	1	1	1	6
NO COMMENT	1	6	0	1	0	8
TOTAL	19	34	9	27	18	107



6.8 A total of 48 people selected a combination of the four spatial options would be best. The table below outlines the various combinations that people stated on their Option Forms. One of the most prominent comment / suggestion was that Bingley should be designated at a Principle Town within the settlement hierarchy, alongside llkley and Keighley.

BREAKDOWN OF THE COMBINATION OF THE OPTIONS						
COMBINATION	THORNTON	SALTAIRE	THORNBURY	ILKLEY 15 March	KEIGHLEY 19 March	TOTAL
OF THE OPTIONS	5 March 08	8 March 08	12 March 08	08	08	
1 - 2	1	1			1	3
1 - 3		4				4
1 - 4		1		3	1	5
1 - 4 + BINGLEY AS P.T	1			1		2
2 - 3	1			1		2
2 - 4	1	2	1			4
3 - 4		2		2	2	6
3 - 4 + BINGLEY AS P.T				1		1
3 + BINGLEY AS P.T				5		5
4 + BINGLEY AS P.T	2	1		2	1	6
1 - 2 - 3	1					1
1 - 3 - 4	1				1	2
1 - 3 - 4 + BINGLEY AS P.T				1		1
2 - 3 - 4		1				1
1 - 2 - 3 - 4					1	1

6.9 Comments made by respondents highlighted that there were advantages and disadvantages within each options, and particular aspects need to be addressed if any one option is to be chosen. A brief outline of the main issues is provided below:-

#### General

 Options should be considered side by side with Craven, Kirklees and Leeds Districts

#### Settlements

- Bingley should be a Principal Town
- Thornton & Queensbury should be Local Service Centres
- Preserve character of settlements
- Concerns regarding the merging of settlements in the rural areas
- Lack of land in Ilkley for development
- Development of Esholt as a major settlement
- Shipley and Canal Road Corridor should be left alone
- Imaginative redevelopment of inner cities

#### Housing

- Development in Bradford City Centre
   and in the East makes sense
- Not for profit/low cost housing in Local Service Centres/ Growth Centres
- Combination of housing and employment in each area
- Affordable housing & housing mix
- Eco housing
- Good quality / sympathetic design -Design for life

• Density - current levels too dense

#### Employment

- Dispersed employment areas
- Employment close to M62

#### Transport Infrastructure

- Transport infrastructure is vital -Infrastructure before housing developments
- Poor infrastructure at present
- Poor transport infrastructure in Wharfedale – is currently at capacity
- Accessibility
- Green routes

#### Environment

- Consideration of environmental constraints
- Against release of Green Belt
- Minimise encroachment into woodlands, habitats and protect the wildlife
- Avoid building on flood plain
- Maximum use of Brownfield Land/Sites to avoid urban sprawl
- Protect breeding birds on SPA
- Protect green open spaces
- 6.10 The table below shows the spread of the option choices which were taken into consideration throughout the consultation events, including Planning Aid events and from comments made in representations. These results demonstrate a similar trend to the results above, in that a 'combination' of the options is the approach preferred.

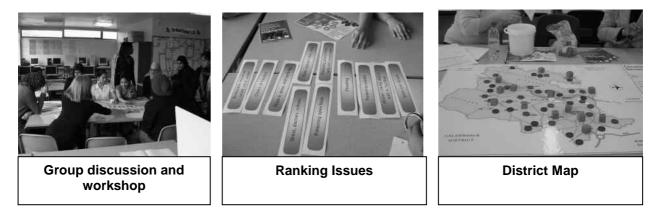
Overview of option choices throughout the consultation								
Event / Method	OPTIONS				. –	None	No	Totals
	1	2	3	4	Comb	None	Comment	Totals
Thornton Event - 5th March 2008	2	3	3	1	9	0	1	19
Saltaire Event - 8th March 2008	9	0	0	2	14	3	6	34
Thornbury Event - 12th March 2008	0	5	1	0	2	1	0	9
Ilkley Event - 15th March 2008	1	0	3	7	14	1	1	27
Keighley Event - 8th March 2008	2	1	1	4	9	1	0	18
Written Representations (stating option)	8	0	5	8	16	11	26	74
Planning Aid - BOPA Event	4	3	1	0	0	0	0	8
Planning Aid - College Events	3	23	43	14	0	0	0	83
TOTALS	29	35	57	36	64	17	34	272

#### 6.11 School Engagement Project

A series of sessions were organised with local schools to identify the issues for young people and to also develop an appreciation for where young people would like to see new development over the next twenty years. The following sessions were held:-

Date	School	Class	No of Attendees
3 <sup>rd</sup> March 2008	Belle Vue Girls School	Gifted and Talented A-Level Students	12
13 <sup>th</sup> March 2008	Rhodesway School	Year 12 - A-Level Geography	7
13 <sup>th</sup> June 2008	Parkside School	Year 10 Geography	
18th June 2008	Hanson School	Year 9 Geography	21
20th June 2008	Laisterdyke Business & Enterprise College	Year 8	whole year group
27 <sup>th</sup> June 2008	Parkside School	Year 10 Geography	
4 <sup>th</sup> July 2008	Laisterdyke Business & Enterprise College	Year 8	whole year group
11th July 2008	Laisterdyke Business & Enterprise College	Year 8	whole year group

A number of activities were organised, these included the ranking of issues and the identification of broad area for development on a map using counters. The activities were developed further after each event to improve them and to ensure they were as suitable as possible for each set of pupils. A summary of comments is available to view within a separate Consultation Event Log.



The table below indicates the results from a questionnaire that was handed out to students during the consultation events within various schools in Bradford.

QUESTION	Agree	Disagree			
BUILDING NEW HOMES					
The location of housing in the urban areas should not result in the loss of green spaces, parks and playgrounds.	87%	13%			
The location of housing should encourage people to use public transport, or walk or cycle to shops, schools and work.	86%	14%			
The location of housing should be used to maintain village life in villages and smaller settlements.	77%	23%			
FINDING LAND FOR JOBS					
The majority of employment activities should be concentrated near to good road connections.	82%	18%			
Jobs should be located close to where people live to reduce travel by car.	89%	11%			
Employment activities should be located close to good bus routes and train stations.	82%	18%			
PROTECTING THE GREEN BELT					
No land should be taken from the Green Belt for development.	57%	43%			
Land should be removed from the Green Belt and allowed for development when it would not cause harm to rare animals and	65%	35%			

Core Strategy DPD

plants.		
Land should be removed from the Green Belt and allowed for		
development where people can still travel to school, shops and work	67%	33%
by bus, train, walking or cycling.		
Land should be taken from the Green Belt without any restrictions.	14%	86%

\* Please note that these results do not include Hanson School.

#### 6.12 Yorkshire Planning Aid Events

A series of events were organised by Yorkshire Planning Aid and these are outlined below along with the number of people who attended them

Date	Time	Group / Organisation	Venue	No of Attendees		
		Organisation		Allendees		
BME COMMUNITIES EVENTS						
11 <sup>th</sup> April 2008	17.30 –	Bangladeshi Youth	52 Cornwall Road,	12		
· · · · · · · · · · · · · · · · · · ·	18.30pm	Organisation	Bradford			
16 <sup>th</sup> April 2008	11am –	Grange Interlink	Summerville Road,	24		
-	3pm	_	Bradford			
- the second second		Keighley Asian	Eastwood Centre,			
28 <sup>th</sup> April 2008	1 – 3pm	Women and	Keighley	25		
		Children's Centre				
27 <sup>th</sup> May 2008		Mary Seacole		27		
		Centre				
OLDER PEOPLE	(BOPA) EVEN	т				
		Bradford Older				
26 <sup>th</sup> March 2008		People's Alliance	Midland Hotel, Bradford	180		
20 101011 2000		(BOPA) and Age		100		
		Concern				
COLLEGE EVEN	TS					
9 <sup>th</sup> April 2008		1	Keighley College	10		
9 <sup>th</sup> April 2008		2	Keighley College	7		
21 <sup>st</sup> April 2008			Keighley College	7		
23 <sup>rd</sup> April 2008		1	Shipley College	8		
23 <sup>rd</sup> April 2008		2	Shipley College	12		
29 <sup>th</sup> April 2008		1	Shipley College	10		
29 <sup>th</sup> April 2008		2	Shipley College	12		
29 <sup>th</sup> April 2008		3 Shipley College		19		
6 <sup>th</sup> May 2008			Keighley College	10		
14 <sup>th</sup> May 2008		1	Bradford College	7		
14 <sup>th</sup> May 2008		2	Bradford College	5		
22 <sup>nd</sup> May 2008			Keighley College	12		
TOTAL ATTENDE	EES			387		

#### 6.12.1: BME COMMUNITIES

#### Where should the 50,000 new homes go?

The table below displays the number of ticks received for each option

Green areas in built up area	1
Green belt	0
Brownfield land (been previously developed e.g. old factory site)	16
In the main Bradford urban area	7
In smaller places e.g. Ilkley, Keighley, Queensbury	1

#### What types of housing are needed in Bradford?

- Good quality
- Affordable (family) housing
- Family housing
- Detached houses with big gardens and 3 car parking spaces
- Houses not to be built in one way streets
- Houses not to be built along main/busy roads

#### Location of housing - City centre or in rural areas?

- City centre due to easy access and has lots to offer young families.
- City centre does not really have many leisure facilities, it is ok for the people who are here now but if more people come because of new housing more employment, transport and facilities will be needed.
- More housing in the city centre would deprive Bradford of leisure facilities.
- Not a lot of room in the city centre for more houses.
- It depends where the houses go, Salts Mill and green spaces are important.
- Concerns about loss of green spaces where people / children use to play.

Benefits of more housing:	Negatives of more housing:
Need for housing to accommodate	More people in the community –
large families	trust issue
New housing will be more	Cramping
sustainable – retain heat	
New housing could have larger	More kids/adults to fight
spaces between them.	Loss of Greenfield/Green Belt and land to farm – should build on Brownfield

#### 6.12.2 Older People's (BOPA) Consultation Event

#### Housing:-

- Spread housing over the district
- Consider building a new village/small town if a suitable site could be found.
- Need to know the makeup of population and what their needs are then identify type of housing to be built
- Housing cannot be looked at in isolation
- Right type of property in right location
- Use vacant properties
- Specific needs for individuals i.e. older people purpose built properties adapted and near health centres and promote independent living
- Must be mixed communities development
- Urban form of flats support effective use of land
- Build majority of new housing close to big centres and cut down need to travel to place of work
- New housing developments should contain affordable dwellings including starter homes.
- Need for social housing across the district
- Concentrate on infrastructure first before house building
- New homes must be environmentally friendly
- New homes must be lifetime homes
- Ensure brownfield sites are developed first

#### Economy & Jobs

• Encourage employment in leisure (not pubs) in main centres

#### Transport:-

- Traffic management is key to any and all of the housing growth
- Transport improved bus services and make affordable
- Infrastructure needs to be put in place Road, facilities etc
- Good transport connections out to tourist and leisure areas (e.g. countryside) essential

#### **Community Facilities**

- People value local services
- Facilities schools, GPs surgeries / medical centres should be available
- Provision of open spaces, leisure facilities e.g. bowling green. Children need play areas

• Work together with police to monitor and reduce crime

#### **Environment:**

- Climate change issues
- Flood Risk issues
- Concern about building on corridor between Bingley and Keighley

#### **Spatial Options:-**

- Some interest in developing Holme Wood, especially if it resulted in a new and proper centre for the area, and Esholt, if it meant building on the old sewage works.
- Spreading out development would be the best option.
- Canal Road corridor does not have significant potential for growth owing to lack of land/space.
- There was consensus that Bradford and Keighley should be the main centres for growth.
- Option 1 too many people in one area, would lead to overcrowding
- Option 2 potential growth and employment along the Aire Valley area. Better than
  option 1 because houses are more spread out and Bingley becomes a principle town.
  Less pressure because its spread out over a wider area.
- Option 3 good to have housing growth next to employment growth. May benefit
  existing deprived areas such as Holme Wood. It depends what type of employment is
  built around the housing areas. Too concentrated. Issue of affordability.
- Option 4 Housing seems better dispersed. Seems to be best option

PRO'S	CON'S
Housing choice	Overcrowding
More flats where students need them	Congestion (increased)
Affordable housing?	Will we be able to afford new housing,
	say in Ilkley?
Improved environment to cope with more	Make sure general mixed affordable
housing	housing FOR ALL
Build skyscrapers, build up and save	Too many small houses?
ground	
Can knock down old factories etc	Need to control who moves in
New / expanded communities	More pollution
More (better) facilities to meet needs of	More people - more crime
increased numbers or nothing to do as	
now and more trouble	

#### 6.12.3 College Events

Multi cultural	Do not build on parks, use countryside
	first
Provide better transport links	Need better transport links
More jobs	What type of jobs and who for?
Better shopping malls etc	Could mean less jobs available
Houses pries will be cheaper for new	Will not work if we do not have
buyers	affordable and central leisure facilities
	to include swimming, ice skating,
	cinemas and youth centres
New faces	Lose green spaces / countryside
Community	Poor health services now, so what
	would 50000 more homes bring?
	Services for elderly are bad now and
	with an aging population this could
	make it worse
	Could be worse neighbourhoods. It
	depends on who moves in and where
	Poor views

#### **General comments**

- New housing must be of **good quality and design** and blend in with existing character of area
- Only build housing where people would want to live
- Build new housing **where it is needed** e.g. build new flats and studios near university for students, new homes for the elderly near existing facilities
- Convert old mills as now, but make them affordable for all
- Young people really would like the **choice** to buy a nice house and get a job
- If going to build on green spaces, use countryside, not parks as communities need parks locally
- Do not build on green spaces or on flood plains
- Make sure new facilities are built with new housing/communities and reduce travel needs.
- Must have **schools** etc with houses, not isolated housing estates
- There must be **total package of facilities and transport** to go with the houses or we will be no better off than we are now.
- Houses built to poor quality standards and that shops etc are never put with new houses
- Look at crime rate before decided whether to build new houses on a piece of land.
- 6.12.4 Holme Wood Consultation Event November 2008

In addition to the above event, a further event was held in partnership with Bradford Council in Holme Wood to discuss the proposal to extend the housing estate. In total 175 people attended the event.

Date	Time	Workshop	Venue	No. of Attendees
29 <sup>th</sup> November 2008	11am – 3pm	Holme Wood Estate	TFD Centre, Broadstone Way, Holme Wood	175

The Consultation Event Log for this event includes a record of the issues raised. The points raised have been summarised below

• The majority of people were against any form of extension to Holme Wood and the primary reason for this would be the loss of the Green Belt.

If the proposal was to go ahead, the community stated the following points:

- The council should renovate existing empty properties
- Majority of respondents favoured up to 1000 homes to be built. There was little support for any more development than this.
- The community favoured a range of housing types and tenures but highlighted the need for larger houses.
- There was overwhelming consensus for eco homes within the estate.
- A large proportion of people stated that they would like to live in the new houses if they were built.
- There was mixed opinion regarding what community facilities would be desired; however there was overwhelming support for a local police station.
- A range of food shops/stores were favoured over other types of facilities.
- Various community facilities were highlighted as desirable; however a country park was highly favoured.

#### TRANSPORT/TRAFFIC

- Transport is already a huge problem, especially on Tong Street.
- A new link road would have a detrimental impact on greenbelt

#### COUNTRYSIDE/GREENBELT/ENVIRONMENT

- Protect the greenbelt and open spaces
- Beware of steep relief, flooding in Pudsey Bank & old mine shaft.
- Preserve conservation area and listed buildings

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#### HOUSING

- Too large a development will not be integrated into the Holme Wood Community, but will stand alone. Less than 1,000 well placed may be able to add benefit to Holme Wood.
- Repair existing houses
- Holme Wood is big enough already

#### SERVICES

- Lack of employment and services within the area to accommodate this level of housing.
- Doubt people of Holme wood would benefit from the new amenities
- More safety for disabled people.
- Support for a supermarket

#### **Holme Wood Petition**

6.12.5 In addition to the written representations submitted and the comments given at the event above, a petition with over 500 signatures was presented to the Council on Tuesday 20<sup>th</sup> January 2009 entitled "Protecting Tong Valley and the Communities of Tong and Holme Wood". This has been referred to the Council's Executive Committee for consideration. This will be presented to the Committee alongside the Further Engagement Draft documents.

#### 6.12.6 The petition stated:

"We, the undersigned, being residents of the electoral ward of Tong, wholeheartedly oppose any plan of Bradford Council for further substantial housing development in the Tong Valley. In particular we therefore oppose the proposals represented by Options Three and Four of the Core Strategy LDF Consultation documents".

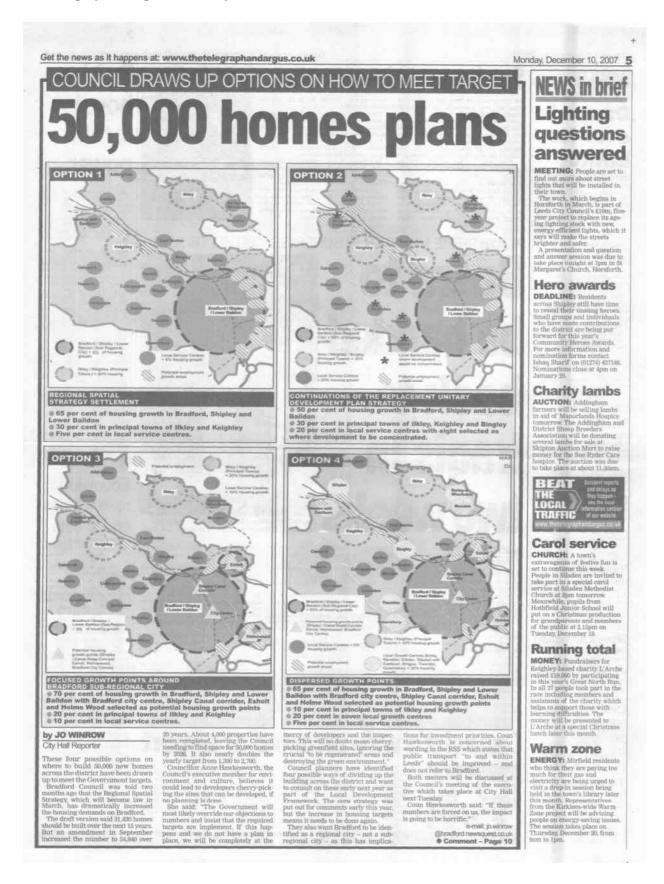
#### 6.13 Media – Press Releases

6.13.1 The following pages provide a record of the media coverage which surrounded this Further Issues and Options consultation. Some of the newspaper articles as listed within 3.3.5 within the main report are provided in the following pages.

Keighley News – 13<sup>th</sup> March 2008



#### Telegraph & Argus – Monday 10<sup>th</sup> December 2007



#### Telegraph & Argus - Friday 29<sup>th</sup> February 2008

## **CITY HALL: OPINIONS ARE SOUGHT FOR VITAL DOCUMENT** e v **ir views on** a h by JO WINROW

**City Hall Reporter** 

People across the Bradford district are urged to give their views on Government plans to build 50,000 new

homes across by 2026. Bradford Council has been told to pre-pare plans to meet the future housing needs of the district.

The proposals in the Regional Spatial Strategy mean that the Council could be forced to remove land from the existing green belt to create new places to live and to expand existing larger settlements. It also needs to look at brownfield sites – lond that hea provincitly hean developed

land that has previously been developed around urban areas to see if there is scope for more housing. The Council is considering a range of

options which are summarised in the Core Strategy document which will form part of the Local Development Framework. It is available on the Council's website at bradford.gov.uk/ldf

#### 1.11 1011: 57.1

Where do you think we should allow more new homes to be built?

Click on 'forums' at telegraphandargus.co.uk

and all the main Council libraries. Residents are invited to workshops to dis-cuss these and other options so the Council can gather people's views on how and where these housing needs should be met and the implications for the district. The workshops will take place on: • Wednesday, March 5, Thornton Primary School, 6.30pm to 9pm; • Saturday, March 6, Victoria Hall, Saltaire, 10am to 1pm; • Wednesday, March 12, Thornbury Centre, Bradford, 1pm to 4pm; • Saturday, March 15, Ridings Hall, Ilkley, 10am to 1pm;

• Wednesday, March 19, Temple Row Centre, Keighley, 6pm to 9pm. Councillor Anne Hawkesworth, execu-tive member for environment and culture, said: "The Government has told us to pre-pare plans to provide land for at least 50,000 homes by 2026 and we need to work together to ensure these housing needs are met, but not at the expense of the appearance and vitality of the district. "We need people's views so that we can make effective representations to Government and deliver what is in the best interests of all current and future residents of the Bradford district." To reserve your place at a meeting, con-tact (01274) 452499 or e-mail ldf.consulta-tion@bradford.gov.uk or via the Council's website.

website. Once agreed, these plans will form part

of the new Local Development Framework. It replaces the Replacement Unitary Development Plan which provid-ed a blueprint for the district. e-mail: jo.winrow @telegraphandargus.co.uk

#### Ilkley Gazette – 6<sup>th</sup> March 2008

# Residents to get a say as green belt is threatened

RESIDENTS of Ilkley, Addingham, Burley-in-Wharfedale and Menston will soon get the chance to say how much of the area's green belt they are prepared to see swamped by housing.

Planners say that new housing target figures set by central Government give them little choice but to consider releasing green belt land to build more homes.

The Government figures says Bradford planners have to prepare a 'horror' strategy to build at least 50,000 more houses in the district in the next 18 years.

The proposals made under the Regional Spatial Strategy, mean that the council could be forced to remove land from the existing green belt to create new places to live and to expand existing larger settlements.

It also needs to look at previously developed, brown field land around urban areas to see if there is scope for more housing development.

The Government encourages councils to build on previously developed land before using green belt, but there is little available in Wharfedale.

likley councillor Anne Hawkesworth, as Bradford's environment and planning chief, is in charge of the strategy. She said: "As it stands, there are four options to be considered. None of them is a preferred option. Indeed, they all fill me with horror."

Residents are invited to workshops across the whole of the Bradford district to discuss these and other options and gather people's views on how and where these housing needs should be met, and the implications for the district.

The Ilkley workshops will take place on Saturday, March 15, at Riddings Hall, Riddings Road, from 10am to 1pm.

#### by PAUL LANGAN

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Other workshops will take place next month in Thornton, Saltaire, Thornbury and Keighley.

Coun Hawkesworth said: "The Government has told

us to prepare plans to provide land for at least 50,000 homes by 2026 and we need to work together to ensure these housing needs are met, but not at the expense of the appearance and vitality of the district.

"We need people's views so that we can make effective representations to Government and deliver what is in the best interests of all current and future residents of the Bradford district."

To reserve a place at the workshop in Ilkley, contact the long-term planning team on (01274) 432499 or e-mail (ldf.consultation@bradford.gov.uk) or via the Council's website at (www.bradford.gov.uk). To find out more about the plans, or

10 find out more about the plans, or comment online, people need to log on to the website and then follow the links to the local development framework. The council is considering a range of options which are summarised in the Core Strategy, which is available on the council's website at (www.bradford.gov.uk/ldf) and Ilkley library on Station Road.

Once agreed, these plans will form part of the new Local Development Framework (LDF) Core Strategy, which will be used by planners and developers in years to come.

The LDF replaces the former Replacement Unitary Development Plan (UDP) which provided a blueprint for the district.

#### APPENDIX 7: SUMMARY OF COMMENTS RECIEVED - FURTHER ISSUES AND OPTIONS CONSULTATION

7.1 Consultation on the Spatial Vision and Strategy, Initial Sustainability Appraisal and Settlement Study received 317 written responses, a sharp increase from the initial consultation in 2007. A full summary of the representations received for both consultations can be found in an accompanying 'Summary of Representations' documents. Due to the varied nature of the responses and repetition of comments, the representations have been summarised and are set out below under the key themes.

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
Question 1: Do you agree with our vision?	Yes: 28 respondents No: 12 respondents In part: 2 respondents	Feedback noted.
	<ul> <li>General Comments:</li> <li>Vision for district should be briefer and locally specific.</li> <li>Vision is too idealistic and set out in general terms</li> <li>It should be clear how the vision flows from the issues.</li> <li>Provide explanation of how the individual area visions relate to the vision for Bradford as a whole</li> <li>It should refer to Bradford's role in Leeds City Region</li> <li>City Centre would benefit from being more aspirational</li> <li>Keighley – vision lacks recognition of towns character, setting or industrial heritage</li> <li>Growth figures were questioned.</li> </ul>	All comments and issues noted. The revised vision in the Further Engagement Draft document seeks to strike a balance between aspiration and realism and is now more place specific. The need for growth over the plan period have been explained and justified as a basis for the Further Engagement Draft document.

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
	<ul> <li>Employment</li> <li>More information is needed regarding Ilkley's role in providing future employment growth.</li> </ul>	The RSS supports the indigenous growth of the economies of the principal towns, including llkley, providing the main focus for employment in rural areas. <b>Sub Area Policy WD1 (Wharfedale)</b> sets out the strategy for this area, including llkley. The Core Strategy therefore proposes to allocate 10 hectares of land for employment purposes in Wharfedale.
	<ul> <li>Transport</li> <li>Transport connections do not mention freight</li> <li>Text indicates a lack of thinking regarding sustainability</li> <li>Text improvement - Relationship between Silsden &amp; Steeton could promote a joint approach to develop better use of rail connections</li> </ul>	<ul> <li>Freight is now being addressed within the Core Strategy under Policy T6 (Freight).</li> <li>Sustainability is an important strand running through all transport policies in the Core Strategy and the text will be amended to reflect this importance.</li> <li>The Steeton and Silsden synergy is addressed within the Transport section of the Further Engagement Draft document.</li> </ul>

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
	<ul> <li>Environment</li> <li>Natural England are pleased to see an aim to make all development carbon neutral, and adapted to the effects of climate change.</li> </ul>	Comment noted.
	<ul> <li>Heritage</li> <li>Historic assets should be safeguarded and the unique character of Bradford City Centre reinforced</li> <li>The wording for Saltaire World Heritage Site is unclear</li> <li>Haworth – management of tourism - need to ensure it does not adversely effect historic character</li> </ul>	<ul> <li>Comments noted. The proposed approach is to introduce a locally specific policy to strengthen protection, enhancement and management of the historic environment assets within the District.</li> <li>Policy EN3 (Historic Environment) encompasses all heritage assets, including Saltaire World Heritage Site and their protection, enhancement and management.</li> <li>Policies E4(F) (Sustainable Economic Growth) and TR4 (Transport and Tourism) address some of the issues surrounding the potential effects of tourism, thus complementing Policy EN3 to protect historic areas.</li> </ul>
	<ul> <li>Principal Towns &amp; Local centres:</li> <li>Queensbury's potential is not recognised – this is a sustainable location and vision should be more ambitious</li> </ul>	During this consultation, this option was not informed by appropriate evidence. Since the consultation the Retail and Leisure Study (2008)

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
	<ul> <li>Haworth – tourism not to undermine the role as residential and employment area; tourism to ensure character is not adversely affected.</li> <li>Need to be more explicit regarding Keighley in terms of support retail, service &amp; leisure expansion and regeneration</li> <li>Ilkley – clear definition needed of 'surrounding area'</li> <li>Silsden &amp; Steeton – relationship could be improved to promote a joint approach to developing these areas.</li> </ul>	<ul> <li>has now informed the network and hierarchy of centres in the Further Engagement Draft document.</li> <li>Sub Area Policy PN1 (Pennine Towns and Villages) sets out the approach for both Queensbury and Haworth.</li> <li>Sub Area Policy WD1 (Wharfedale) sets out the proposed approach for Ilkley and Sub Area Policy AD1 (Airedale).</li> </ul>
Question 2: Do you agree with the objectives?	<ul> <li>Yes: 32 Respondents</li> <li>No: 4 Respondents</li> <li>In part: 2 Respondents</li> <li>General Comments:</li> <li>The housing needs objective is too vague</li> </ul>	Noted. <b>Objective 4</b> covers the need to provide a range of quality dwellings, in terms of type and affordability. <b>Policy HO8 (Housing Mix), HO9 (Housing</b> <b>Quality) and HO11 (Affordable Housing)</b> provide a greater level of detail and requirements over the plan period with regards housing need.

There is a need for more on affordable housing	Objective 4 specifically mentions the need provide
	a range of housing, in particular affordable housing.
	This objective is supported by Policy HO11
	(Affordable Housing) which sets out the
	affordable homes targets across the District. The
	approach accords both with the results of the
	SHMA (2010) and the AHEVA (2010) which tested
	viability levels across the district.
The role of sustainable urban extensions should be	Strategic Objective 1 addresses the need for
acknowledged within objectives	housing in dynamic locations and Strategic
	Objective 2 which recognises these locations for
	housing should be sustainable.
	The role of sustainable urban extensions is
	explained and justifies within Section 2 of the
	Further Engagement Draft report.
<ul> <li>There should be emphasis on developing a world class higher education quarter and student village – link to</li> </ul>	<b>Strategic Objective 8</b> seeks to support educations establishments to ensure a well educated and skilled workforce.
	The role of sustainable urban extensions should be acknowledged within objectives      There should be emphasis on developing a world class

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
	<ul> <li>There should be reference to moving up the waste hierarchy</li> </ul>	Strategic Objective 16 promotes the sustainable management of waste and recycling. Policy EN13 (Waste Management) makes reference to the Council's requirements to move up the waste hierarchy.
	General point regarding sustainable use of all resources	Strategic Objective 16 outlines the need to safeguard and manage all resources. This has been translated into Strategic Core Policy SC2 (Climate Change and Resource Use). Further policies also relate specifically to the sustainable use of resources within the document.
	<ul> <li>Other comments</li> <li>Set out in old-style plan areas rather than key issues and localities.</li> <li>There are too many objectives and most of them could relate to anywhere. More detail is needed.</li> </ul>	Agree. The Council has taken on board these comments and have reflected these within the Core Strategy Further Engagement Draft . The objectives have been revised and the report now focuses on the key issues for Bradford in relation to key sub-areas within the District.

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QUESTION		SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY			
Question 3:	Option 1:	8 Respondents	Noted.
What is your preferred spatial	Option 2:	0 Respondents	
option?	Option 3:	5 Respondents	
	Option 4:	8 Respondents	
	Combination:	16 Respondents	
	None:	11 Respondents	
	Not Stated:	26 Respondents	
	<ul> <li>should re</li> <li>Options s</li> <li>Should a spatial st</li> <li>Infrastruct</li> <li>Include w</li> <li>Option 1: Regional developmit is neces</li> </ul>	should cover more than location of development – late to key issues, vision and strategic objectives should be realistic void trying to set out Settlement Hierarchy as	<ul> <li>The Further Engagement Draft document set out the key issues, vision and objectives for Bradford and how these elements, along with a robust evidence base have informed the spatial strategy for the location of development.</li> <li>The provision of infrastructure will be part in parcel of any development, provided by service providers as and when required according to investment priorities. The Core Strategy sets out Policy ID4 (Working with partners) when developing the infrastructure. Similarly the Sub Area Policies for the City</li> </ul>

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
	<ul> <li>housing and employment opportunities can come forwards in more rural areas to increase potential for linked homes to jobs to spread across district</li> <li>Options do not enable a degree of flexibility or responsiveness to market demands</li> </ul>	<ul> <li>of Bradford (BD1), Airedale (AD1), Wharfedale (WD1) and the Pennine Towns and Villages (PN1) also address the need for infrastructure.</li> <li>Windfall sites will be included in the later stages of the plan.</li> <li>Basis of over affordability more sustainable given trans infra and would not necessary mean high density developments would make sure it provided</li> <li>The proposed approach has been prepared using the outcomes of the SHLAA and AHEVA, therefore demonstrates a degree of flexibility.</li> <li>With regards to the constraints map, this map was produced for illustration purposes only. Whilst not identified on this map, each of thes designations has been taken into account in the formulation of the Further Engagement Draft document.</li> </ul>

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
	Settlement Hierarchy Another layer added to settlement hierarchy to accommodate difference between Queensbury and Cullingworth, Harden & Wilsden	The settlement hierarchy now makes a distinction between Local Growth Centres and Local Service Centres. As a result, Queensbury is now a Local Growth Centre and the remaining settlements are Local Service Centres.
	<ul> <li>Bradford</li> <li>More emphasis on Queensbury aimed at improving self sufficiency of the town</li> <li>Floor space in Queensbury not recognised</li> <li>Flexibility of Queensbury to develop the role as a Leeds City Region</li> </ul>	Sub Area Policy PN1 (Pennine Towns and Villages) sets out the role that these area, in particular Queensbury, will play in the future until 2028
	<ul> <li>Aire valley</li> <li>Suffers from congestion</li> <li>Offers well developed transport infrastructure</li> <li>Keighley needs regeneration</li> <li>More jobs in Airedale</li> <li>Bingley should not be a Principal Town as it will take public/private investment away from Keighley and Shipley undermining their expansion/regeneration</li> </ul>	Comments noted. The RSS supports the indigenous growth of the economies of the principal towns, including Keighley, providing the main focus for employment in rural areas. Airedale is also seen as a focus area for economic investment and jobs growth and this is carried through to the Core Strategy. The Core Strategy therefore proposes to allocate 31 hectares of employment land in the Airedale Corridor to accommodate this growth

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
PATIAL VISION AND STRATEGY		
	<ul> <li>Wharfedale:</li> <li>Ilkley should be identified as an employment growth area</li> <li>Reduction in jobs/industry in Wharfedale</li> <li>Employment in Wharfedale to contribute to sustainability</li> <li>Train services - insufficient capacity at present</li> <li>Roads are congested at peak times</li> <li>Schools reaching capacity</li> <li>Lack of nearby hospitals</li> <li>Lack of affordable housing in Ilkley</li> <li>Burley and Menston should not be considered as Local Growth Centre's</li> </ul>	Comments noted. The RSS supports the indigenous growth of the economies of the principal towns, including Ilkley, providing the main focus for employment in rural areas. The Core Strategy therefore proposes to allocate 10 hectares of land for employment purposes in Wharfedale and therefore retain jobs locally, helping top reduce commuting.
	<ul> <li>Green Belt releases –</li> <li>Leeds City Council object to Green Belt releases including new towns at Holme Wood and Esholt. This would result in coalescence of settlements.</li> <li>Development within Burley and Menston would put additional pressure on transport network in Leeds.</li> <li>Keyland Development support further investigation of development in Esholt.</li> </ul>	The Further Engagement Draft document highlight the potential for localised and strategic Green Belt releases across the District. These are set out within the <b>Sub Area policies for the City of</b> <b>Bradford (BD1), Airedale (AD1), Wharfedale</b> (WD1) and the Pennine Towns and Villages (PN1).

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
Question 4: Settlement Study	<ul> <li>General comments:</li> <li>A full assessment is required of the role that settlement play within the District and the constraints identified in settlements</li> <li>Does not provide any options for consideration in terms of any settlement study, or which settlements are considered capable of delivering growth.</li> <li>Study should take into account existing capacity in local infrastructure and also ability to provide additional capacity to meet future growth.</li> <li>Include an analysis of local employment opportunities for services and self-employed jobs</li> <li>Yorkshire and Humber Assembly support the document</li> </ul>	<ul> <li>Comments noted. The draft Settlement Study has been revised to include a full and detailed assessment of each settlement; its role, function, characteristics and constraints. It is not the role of this document to outline options or capacity of settlements to meet future growth. Further pieces of evidence as listed below provide further information regarding capacity and options:</li> <li>Draft Growth Assessment</li> <li>Local Infrastructure Plan</li> <li>Strategic Housing Land Availability Study (SHLAA)</li> </ul>
	<ul> <li>Heritage:</li> <li>Consideration of the effects of development on environmental resources should also include the historic environment</li> <li>Portrait of the district lacks mention that the district has 'third highest number of designated assets in the Region and one of only two World Heritage Sites in Yorkshire'</li> </ul>	<ul> <li>Policy EN9 Sandstone Supply addresses the issue of environmental resources and material supply in relation to the historic environment in accordance with Spatial Objective 12.</li> <li>The spatial portrait for built heritage has been revised in light of comments.</li> <li>The term 'heritage assets' has been used to encompass all designated and undesignated</li> </ul>

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
TIAL VISION AND STRATEGY		
	<ul> <li>Absence of Ancient Scheduled Monuments; Conservation Areas, Registered Battlefields and Registered Parks and Gardens and cemeteries.</li> <li>Environmental constraints map fails to include nationally important archaeological and historic sites and landscapes</li> <li>Ilkley Moor – with a dense concentration of nationally important and protected ancient monuments are omitted</li> </ul>	<ul> <li>assets within the District. Where relevant these assets have been referred to individually</li> <li>The purpose of the environmental constraints map was to illustrate natural environment constraints.</li> <li>The Scheduled Ancient Monuments are captured under the term 'heritage assets'. Due to the sheer number of these assets these can not be identified on the environmental constraints map.</li> </ul>
	<ul> <li>Evidence Base:</li> <li>Study lacks assessment of land development capacity</li> <li>List of supporting documents should be made available</li> <li>No reference to Strategic Flood Risk Assessment</li> <li>Add: Number of available school places <ul> <li>Health services available in each area</li> <li>Traffic impact assessments</li> <li>Employment opportunities</li> <li>Specific details on public transport</li> </ul> </li> </ul>	Comments noted. Since the Issues and Options consultations the Council has prepared or commissioned a number of pieces of evidence to support the Core Strategy preparation. These will be available as part of the Further Engagement Draft consultation for public viewing which address many of the comments received.

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
	<ul> <li>Specific areas:</li> <li>Menston – transport at capacity at peak times</li> <li>Ilkley should be classified as a Local Service Centre not as a Principal Town</li> <li>Bingley should be reallocated as a principal town</li> <li>Keighley has good local employment – scope for development in both new high tech industries and exploitation of current skills</li> </ul>	Noted. The strategy for these settlements is set out within the <b>Sub Area Policies for Airedale AD</b> <b>and AD2</b> and <b>Wharfedale WD1 and WD2</b> . Bingley has been upgraded to a Principal town within the plan alongside Ilkley and Keighley.
General Comments: Housing	<ul> <li>Questioning housing Figures</li> <li>Need to consider supply and demand</li> <li>Deliverability – appropriate infrastructure should be in place</li> <li>High quality design</li> <li>Concentration of housing development in Ilkley, Keighley and Bradford is probably the most sustainable pattern of development because they are well served by public transport</li> <li>Unused and empty buildings should be utilised better</li> </ul>	<ul> <li>The housing requirement figures are fully justified and set out within Policy H1 (A) (Scale of Housing Required).</li> <li>Housing supply and demand have been assessed in producing the Core Strategy.</li> <li>Infrastructure issues are referred to above.</li> <li>High quality design is promoted by Policy H5;</li> <li>As much of the housing growth as possible has been focussed on the larger settlements in accordance with the settlement hierarchy set out in the Core Strategy. However other factors including the available land supply and</li> </ul>

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
		been taken into account in determining the final
		proposed distribution of housing growth.
		<ul> <li>Both national and local policy is seeking to</li> </ul>
		ensure that better use is made of vacant and
		unused buildings. However these sources will
		only be able to make a modest contribution to
		supply given the scale of housing needed over
		the next 15 years.

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATED	GY	
General Comments: Economy & Jobs	<ul> <li>Employment Land Review - should be made available</li> <li>Limited provision for employment in Wharfedale</li> <li>Need to both foster indigenous growth and provide for latent demand that exists from those who live in Ilkley but work outside the area.</li> <li>There is no recognition in any of the options that Bradford has been identifies for significant employment growth</li> </ul>	<ul> <li>The Employment Land Review will be published as part of the evidence base alongside the Further Engagement Draft consultation.</li> <li>Limited provision of employment land in Wharfedale is considered under Policy EC3 (B) (Employment land Requirement)</li> <li>The Allocations DPD will assess the need for Small Medium Enterprises (SME's), incubation/starter units as well as identifying additional employment land in the principal towns.</li> <li>Bradford urban area is key to future jobs growth and the offer of new investment and employment opportunities as indicated by the target figure in Policy EC3 (Employment Land Requirement).</li> </ul>

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
SPATIAL VISION AND STRATEGY		
General Comments: Transport	<ul> <li>Transport infrastructure of the Bradford District is unable to cope with present demands</li> <li>Current infrastructure cannot support housing growth</li> </ul>	Concerns surrounding currently capacity and infrastructure have been taken into account when formulating Policies TR1 (Travel Reduction), TR3 (Public Transport, Cycling and Walking) and T7 (Transport investment and management).
General Comments: Community Facilities	<ul> <li>NOMS suggests that consideration be made for the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan Period</li> <li>Schools in Wharfedale are at capacity</li> <li>Health facilities in Wharfedale are at capacity</li> </ul>	<ul> <li>Agree. A criteria based policy has been included in the Further Engagement Draft document.</li> <li>The Wharfedale Sub Policies WD1 and WD2 seeks to work with infrastructure providers over the plan period to assess opportunities for associated health and education provision.</li> </ul>
General Comments: Environment	<ul> <li>Sequential testing should be carried out to assess whether development intended for the area can be located elsewhere in the district at lower flood risk</li> <li>Foul drainage infrastructure – must demonstrate it is either already available, or is readily deliverable in order to facilitate any new development</li> </ul>	<ul> <li>Sequential testing will be carried out through the full Sustainability Appraisal report.</li> <li>Agree. The Council has consulted with Yorkshire Water with regards to waste water and the sewer network as part of the preparation of the LDF. The Local Infrastructure Plan highlights the outcomes of these conversations and confirms that this</li> </ul>

# FURTHER ISSUES AND OPTIONS CONSULTATION - FEBRUARY TO MARCH 2008

QUESTION	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE	
SPATIAL VISION AND STRATEGY			
		issue would not constrain any development	
		within the District. This issue will need to be	
		covered in the Allocations DPD.	

**APPENDIX 8:** 

FURTHER ISSUES AND OPTIONS CONSULTATION – JANUARY TO MARCH 2008 – SUMMARY OF COMMENTS RECIEVED TO THE INITIAL SUSTAINABILITY APPRAISAL REPORT

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE	
INITIAL SUSTAINABILITY APPRAISA	AL.		
Has the Initial Sustainability Appraisal covered all the relevant	Yes – 4 Respondents No – 12 Respondents	Noted.	
issues?	The SA objectives states to 'Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats. Respondent questions 'how?'	Including this sustainability appraisal objective means that the Core Strategy policies will be tested to assess their broad impact on internationally, nationally and locally valued wildlife species and habitats.	
	There is insufficient emphasis on the differences between the spatial options in terms of generating vehicular traffic and increases in pollution & CO2 emissions.	The Bradford District Wide Transport Study (2010) considered the increases in pollution and C02 emissions but found that the differences between the four spatial options tested was no better or worse in comparison to the other options.	

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	The inclusion of the historic environment within the 'land use' objective would cover the majority of assets; however the natural assets objective which includes man-made landscape could also include Historic Parks and Gardens. It would be more logical if all historic assets were under one objective. Suggestion of one SA objective for the historic environment.	There is now an SA objective that seeks to 'Protect and enhance historic assets and their settings'.
	Broadly concur with the effects identifies in Section 3,0, however it would have been useful for the SA to highlight the areas where more research is required in order to identify the most sustainable option.	Agree. The Council has commissioned a number of pieces of evidence to support the Core Strategy. A full Sustainability Appraisal of the issues and options stages has been produced and this has informed the Core Strategy Further Engagement Draft policies.
	It is not clear how the Sustainability Appraisal Objectives relate to those detailed in Appendix 1	Key words have been used to identify objectives.
	In table 2 a number of potential conflicts between the SA Objectives and the DPO Objectives. It would have been useful, in developing the Plan, if this stage of the SA had also put forward some suggestions as to how this conflict might be resolved.	Appraisal of the Core Strategy objectives has taken place and amendments have been made in response to this.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE	
	The initial SA is extremely generalised and lacks the evidence base and level of assessment required by government guidance.	Comments noted. Since this document was produced, the Council has produced and commissioned a number of pieces of evidence to support the Core Strategy DPD policy development. A full SA of both issues and options stages has been produced and this has informed the Core Strategy policies. The SA is an ongoing process with the aim of identifying the significant social, economic and environmental impacts at each stage.	
	It is important that this document is recognised as being limited in its scope and that a full sustainability appraisal report will be required with the presentation of preferred options	Comments noted. The Council has commissioned ENTEC/AMEC to carry out a Sustainability Appraisal of the Further Engagement Draft report and policies. This will be available during the Further Engagement Draft consultation in 2011.	
	Agreement with the approach to reviewing Green Belt land releases outlined in the last sentence of paragraph 3.2	Comments noted.	
	The findings do not highlight a specific spatial option that fully satisfies all areas of concern. This indicates that the chosen spatial option should be based around 'damage limitation'.	Work on the Sustainability Appraisal is an ongoing process of refining the Core Strategy.	

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TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	The document is necessarily broad but unfortunately does not inform any rational consideration of the options.	Comments noted. A full SA of both issues and options stages has been produced in accordance with national guidance and good practice. This has informed the Core Strategy policies.
	There are general concerns regarding the current levels of infrastructure and the level needed to support the amount of development proposed over the plan period.	Noted. Since this consultation the Council has prepared a Local Infrastructure Plan (2011) which will form part of the evidence base for the LDF. This document outlines the current infrastructure levels within the District and what will be required in the future over the plan period.
	There are general concerns of the intensification of development in Bradford, especially on floodplains and the effects that this may potentially have on the landscape.	The flood risk policy seeks to protect the functional flood plain. The natural environment policy encourages a positive contribution towards the management and enhancement of landscapes within the District.

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE	
	The tPCT was pleased to note that the sustainability appraisal	Comments noted.	
	of the LDF Strategic Objectives and to a lesser extent, the		
	Spatial options, includes health parameters. The tPCT also		
	welcomed the commitment to achieving high levels of		
	sustainability, addressing the effects of climate change		
	(including strategic flood risk assessment), reducing waste,		
	maximising the use of renewable energy and sustainable		
	accessible transport options, including improving access to		
	health provision.		

## **APPENDIX 9:**

LIST OF ORGANISATIONS AND BODIES CONSULTED UNDER REGULATION 25 -FURTHER ISSUES AND OPTIONS: WASTE MANAGEMENT & TOPIC PAPER 7: ENVIRONMENT (MINERALS) UPDATE

The following people were specifically contacted as part of the further consultation on the following Core Strategy DPD documents:

- Waste Management Further Issues and Options
- Waste Management Initial Sustainability Appraisal
- Topic Paper 7: Environment (Minerals) Update

Please note that some these consultees will be duplicated from the previous consultation list.

### **Specific Consultation Bodies**

- English Heritage
- Environment Agency
- Natural England
- Yorkshire and Humber Assembly

### Specific Consultation Bodies (Town and Parish Councils in Bradford District)

- Addingham Parish Council
- Baildon Parish Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council
- Denholme Town Council
- Harden Parish Council
- Haworth, Cross Roads & Stanbury
   Parish Council

### **General Consultation Bodies**

- A&S
- Aggregate Industries UK
- Airedale Partnership
- Allan Bailey
- ASHLAR stone products
- Associated Waste Management
   Limited
- Autospares Bingley Limited

- Ilkley Parish Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Parish Council
- Sandy Lane Parish Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council
- Bank Top Quarry Bank Top Quarry
- Bedminster International (UK) Limited
- Berry And Marshall (Bolton Woods)
   Limited
- Biffa Waste Services Ltd
- Bioganix Ltd
- Birks Royd Stone

- Bradford Chamber of Commerce & Industry
- Bradford Hospitals NHS Trust
- Bradford Organic Composting
   Scheme
- Bradford Waste Traders
- Bradley Natural Stone Products
- CEMEX UK Operations
- Charles Raistrick
- Colas Ltd
- Combined Masonry Supplies
- Covanta Energy Limited
- CPRE Bradford District
- Darrington Quarries Ltd
- Denholme Residents Action Group
- Dennis Gillson and Son
- Dennis Gillson And Son (Haworth) Limited
- Dial A Skip Service Limited
- Dolmens
- ENER-G plc
- Ennstone Johnstone
- Erlings Works
- Fairport Engineering Ltd
- Farrar Natural Stone
- George M Watson (Construction)
   Limited
- Gill Demolitions
- GW Butler Limited
- Hanson Aggregates
- Hard York Quarries Ltd
- Harry Sanders Ltd
- John Hornby And Sons Limited
- Keighley Town Council
- Lafarge Aggregates & Concrete UK
- Leeds Environmental Organisation
   Limited
- Leeds Friends of the Earth
- M & G Stone Ltd
- Midgeham Cliff End Quarry Ltd
- Miles J Delaney

- Mineral Resources (Yorkshire) Limited
- Mr Bryan Scott
- Myers Group
- Northern Stone & Paving Co
- Omega Proteins Ltd
- Orchid-environmental
- P Casey (Enviro) Limited
- P Waddington And Sons Ltd
- Parkinson Spencer Refractories Ltd
- Quarry Products Association
- Russell Stone Merchants
- S M Building Products
- Shanks
- Shipley Stone Sales
- Sibelco UK
- SITA UK Limited
- Skipton Properties
- Sterecycle
- TEG Environmental Ltd.
- The Bingley Stone Company
   (Yorkshire) Ltd
- Thomas Crompton Developments Ltd
- University Of Bradford Estates And Facilities
- Veolia Environmental Services Plc
- VISTA ENVIRONMENTAL LIMITED -Soil Hill
- W E Leach
- Waste Recycling Group Limited
- West Riding Crushing Services
- West Riding Waste Disposal Limited
- WRG
- Yorkshire Aggregates Ltd
- Yorkshire Poultry Products
- Yorkshire Water Services Ltd
- Yorwaste Ltd

Core Strategy DPD

### **Other Consultees**

- Highways Agency, Yorkshire & Humber
- The British Aggregates Association
- Stone Federation Great Britain
- Tarmac Northern Limited

Other Consultees (List of other Organisations and Groups Consulted that are not identified in the Planning Regulations)

- CBMDC Department of Regeneration (Dockfield Road) CBMDC Environment & Neighbourhoods
- CBMDC Waste Project

APPENDIX 10: ACTIONS AND EVENTS DURING THE FURTHER ISSUES AND OPTIONS: WASTE MANAGEMENT & TOPIC PAPER 7: ENVIRONMENT (MINERALS) UPDATE -NOVEMBER 2008

- 10.1 Following consideration of comments received to the initial Topic Paper 8: Waste Management, and to take account of changes to the national and regional policies, the Council felt it necessary to revise the initial consultation document relating to waste management. This enabled stakeholders to assist in choosing options regarding minerals and to make further comments, prior to the preparation of the Further Engagement Draft document
- 10.2 Further consultation was undertaken on three documents:
  - Waste Management Further Issues and Options
  - Initial Sustainability Appraisal of Waste Management Further Issues and Options
- 10.3 This consultation received a total of 13 written representations during the 6 week consultation period.

#### **Summary of Written Representations**

- 10.4 In summary the comments were:
  - Clear reference should be made to European legislation regarding waste and waste disposal which sets a framework and targets to hit for recycling, composting and diversion of waste from landfill. These targets will direct action by the Council.
  - This also applies to UK waste policy legislation where not already mentioned, e.g. the Landfill Tax Regulations 1996; the Household Waste Recycling Act 2004; National Waste Strategy.
  - There should be coherence and consistency with the LDFs prepared by neighbouring authorities, where cross-boundary issues are relevant in terms of cross-boundary waste movements.
  - Consideration should be given to the opportunities to co-locate facilities together with complimentary activities
  - The paper needs to demonstrate sufficient flexibility to accommodate known and unexpected changes, including methods of waste management.
  - Identify the capacity issues currently evident on the Strategic Road Network.
  - The Council should in the first instance seek to utilise the potential for developing existing waste management facilities.

- Ensure that existing waste management sites that will continue to contribute significantly to municipal and commercial waste management infrastructure in the future are safeguarded.
- The Area of Search as defined is not sufficiently robust to be used as a determining factor for the location of future waste management facilities. It does not recognise the difference in scale of different types of waste management facility and their specific locational needs.
- Use of Bradford's Landscape Character SPD to determine additional sensitive locations (for instance, areas of strong landscape sensitivity) which may not be suitable for most waste sites (though some types of waste sites, e.g. composting facilities in redundant agricultural buildings, may be acceptable).

#### Waste - Call for Sites

10.5 A total of 10 sites were put forward from 4 respondents as part of the Call for Sites.

Topic Paper 7: Environment (Minerals) Update: Further Consultation – November 2008

- 10.6 Following consideration of comments received to the initial Topic Paper 7: Environment in 2007, and to take account of changes to the national and regional policies, the Council felt it necessary to revise the documents relating to the environment to include further information surrounding the issue of minerals. This enabled stakeholders to assist in choosing options regarding minerals and to make further comments, prior to the preparation of the Further Engagement Draft document.
- 10.7 Further consultation was undertaken on the following document in November 2008:
  - Core Strategy: Topic Paper No 7 Environment (Minerals) Update
- 10.8 This consultation received 3 written representations. A summary of the comments are provided below.

#### **Summary of Written Representations**

- 10.9 The response from this consultation was limited to comments from non-industry stakeholders, in summary the comments were:
  - Support is given to a strategy based upon restricting further extraction of crushed rock aggregates, maximising the use of secondary materials where appropriate, and of safeguarding such resources form sterilisation by other forms of development;

- It is important that aggregate production at building stone quarries does not compromise the ability of those quarries to provide building or roofing stone;
- Given the uncertainty regarding the viability of known sand and gravel resources within Bradford, it would seem logical to explore further the potential of these resources within the District;
- An assessment of the extent and location of potential sources of building and roofing stone within the District should be undertaken.
- Building and roofing stone resources should be safeguarded from sterilisation by other forms of development;
- Within the Core Strategy, Bradford will need to identify the broad locations of sites.
- The constraints on the exploitation of sand and gravel resources in West Yorkshire should be explained;
- Safeguarding of sand and gravel resources is a requirement not an option.
- 10.10 Due to this limited response from this consultation, the Council's Minerals and Waste Team held further targeted consultation in the form of a meeting with mineral stakeholders to discuss issues and options for this topic. Following this meeting a further written representation was received, bring the total to 4 written representations.

Date	Time	Topic Workshop	Venue	No of Attendees
4 <sup>th</sup> February 2009	10 – 12 am	Minerals Industry Stakeholder Meeting	Design Exchange Little Germany, Bradford	15
TOTAL:				15

### **Minerals Stakeholder Meeting**

10.11 The mineral stakeholder meeting was attended by 15 minerals operators, stone merchants and planning agents. Policy options were discussed in facilitated small discussion groups notes of the comments made during these discussions were recorded, in summary the key points raised were:

### Safeguarding

- Safeguarding is particularly appropriate for proven resources adjacent to existing workings and for particularly scarce resources such as those capable of producing dimension stone.
- Some sites which are being redeveloped for housing are good quality mineral sources.

- Surface coal mining and fireclay resources could become very important in the future and we should safeguard such sites across the district, geologically, fireclay sites in Bradford are world class.
- Except for coal, urban areas should only be included in MSAs if the resource is of a very high calibre, otherwise this could be too restrictive.
- MSA buffer sizes can range from 50m to 500m. Given the differences in scale and practices between quarries, it is difficult to set an MSA buffer size which would be appropriate to all. Urban quarries tend to operate with practically no buffer from surrounding housing.

## Supply and Demand

- The importance of the building stone industry to Bradford should be highlighted. The building stone industry provides employment, keeps traditional crafts and skills alive and provides high quality building materials for use all over the UK.
- A large proportion of building stone and flag produced in Bradford is exported to other regions, London and oversees markets. York Stone is a widely marketable product and sales are not limited to areas where buildings have traditionally been built from this material.
- There is a drastic shortage of building stone, especially that of certain calibres. Reduction in variety/ diversity of supply is also concerning.
- The Dimension Stone produced in the district is sought after and is unique to the district/sub region.
- Reserves of high quality stone have decreased in the area; riven flagstone (Elland Flag) is in particularly short supply.
- A lack of supply can make blockstone so expensive that developers are reluctant to use it.
- There are problems with stone slate supply due to the expense of producing it and a lack of skills.
- There is a need for local stone to maintain the local identity of Bradford and to avoid having to transport stone significant distances.
- Block and flag stone are important for the historical built environment for the district and beyond.
- There are concerns about the sustainability of importing stone and the quality of stone supplied from abroad.
- There should not be a presumption against open cast mining; we must recognise that fireclay requires open cast coal mining.
- The aggregates landbank is within the control of a few operators. The landbank is an artificial concept. There is a need to consider real demand and supply issues.
- Prohibiting aggregate production at building stone quarries would make most quarries impractical to operate.

• No building stone quarry operator would crush any stone reserves which are capable of producing building stone; as the value of building stone is much greater than aggregate.

#### Location of New Minerals Development

- Minerals extraction can only take place where suitable resources occur; therefore mineral planning authorities should not seek to influence the location of new minerals development.
- Areas adjacent to existing operational minerals extraction sites are the most likely locations for new minerals development.
- The opening of new or re-opening of dormant/ disused sites might be preferable to the extension of existing quarries in certain cases.
- Options for the re-opening of dormant and disused quarries should be explored before looking at greenfield sites.
- New technology/machinery could make dormant quarries and disused quarries viable again.
- Exposures from existing workings and the experiences of individual quarry operators are generally the best sources of information on the potential viability of new resources.

#### General

 Minerals planners should work more closely with the Minerals Industry. Policies should have sufficient flexibility to allow for the variability of quarry characteristics and the unpredictability of resources and markets for finished products.

#### **Minerals - Call for Sites**

10.12 A total of 3 sites were put forward from 1 respondent as part of the Call for Sites.

### APPENDIX 11: LIST OF SUPPLEMENTARY CONSULTATION REPORT DOCUMENTS

- 11.1 For each stage of the consultation process at the Issues and Options stage of the Core Strategy, a series of documents have been produced which record each of the consultation events and written representations. These are termed:
  - Consultation Event Logs
  - Summary of Written Representations
- 11.2 This Statement of Consultation collates all this information into one place to provide an overview of the entire consultation process for the Issues and Options stage. A list of the supplementary consultation documents is provided below as a reference:

### 11.3 Issues and Options Consultation Event Logs

#### Area Conference Reports

- Airedale Consultation Event Log
- Wharfedale Consultation Event Log
- Bradford (1) Consultation Event Log
- Bradford (1) Consultation Event Log

### Topic Workshop Reports

- Housing Consultation Event Log
- Transport Consultation Event Log
- Waste Consultation Event Log

#### Summary of Written Representations Reports

- General Comments
- Topic Paper 1 Initial Sustainability Appraisal, Engagement Plan
- Topic Paper 2 Spatial Vision
- Topic Paper 3 Housing
- Topic Paper 4 Economy and Jobs
- Topic Paper 5 Transport
- Topic Paper 6 Community Facilities
- Topic Paper 7 Environment
- Topic Paper 8 Waste

#### Planning Aid Reports

• BME Communities

## 11.4 Further Issues and Options Consultation Event Logs

### Consultation Workshop Reports

- Thornton Consultation Event Log
- Saltaire Consultation Event Log
- Bradford Consultation Event Log
- Wharfedale Consultation Event Log
- Keighley Consultation Event Log

### Summary of Written Representations

Summary of Representations - (This includes the Initial Sustainability Appraisal)

### Planning Aid Reports

- BME Communities Consultation Event Log
- Young People Colleges Consultation Event Log
- Older People BOPA Consultation Event Log
- Holme Wood Consultation Event Log

### School Engagement Project Report

School Engagement Project Report

### Further Consultation – Waste Management & Minerals Report

- Waste Management Summary of Written Representations
- Minerals Summary of Written Representations
- Minerals Consultation Event Log

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