

# **CITY OF BRADFORD MDC LOCAL PLAN FRAMEWORK**

## **EXAMINATION OF THE BRADFORD LOCAL PLAN CORE STRATEGY**

### **SCHEDULE OF MATTERS, ISSUES & QUESTIONS FOR EXAMINATION**

Note: other than the inclusion of a new question 7.11 (Gypsies and Travellers) this version 3 is the same as version 2 distributed to representors and which appears in the Examination library as PS/A004b

***Deadlines for submission of further statements: 20 February 2015***

***Hearings commence: 4 March 2015***

#### **Hearing sessions**

Victoria Hall  
Victoria Road  
Saltaire  
BD18 3JS

Inspector:

Stephen J Pratt BA(Hons) MRTPI

**Programme Officer:**

**Tony Blackburn**  
15 Ottawa Close  
Blackburn  
BB2 7EB

Telephone no: 01254-260286  
e-mail: [tony.blackburn@bradford.gov.uk](mailto:tony.blackburn@bradford.gov.uk)

Web-site:

[http://www.bradford.gov.uk/bmdc/the\\_environment/planning\\_service/local\\_development\\_framework/core\\_strategy\\_dpd\\_examination.htm](http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_dpd_examination.htm)

**CITY OF BRADFORD MDC**  
**EXAMINATION OF THE BRADFORD LOCAL PLAN CORE STRATEGY**  
**SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION**

1. The Inspector has prepared this Schedule of Matters, Issues & Questions for Examination to focus the discussion at the hearing sessions of the Examination of the **Bradford Local Plan Core Strategy** (the "Plan"). It is based on the Planning Inspectorate's Procedure Guidance<sup>1</sup>, and has regard to the representations made to the Submission version of the Plan, the supporting evidence and the guidance in the National Planning Policy Framework<sup>2</sup> (NPPF) and Planning Practice Guidance<sup>3</sup> (PPG). **All participants should be aware of this published guidance**, along with the Inspector's Guidance Notes, published previously<sup>4</sup>.
2. This Schedule lists the main Matters, Issues and Questions to be addressed during the examination. The Council is requested to respond on all Matters, Issues and Questions listed, referring to information in the Submission Documents & Background Evidence (limited to 3000 words per Matter, if possible). If other participants wish to submit further statements (limited to 3000 words) they should only respond on specific Matters, Issues and Questions relevant to points made in their original representation(s), without raising new issues.
3. **Statements should address relevant Matters, Issues & Questions**, rather than repeating points made in the original representations or making new points, and **should not introduce new evidence or material** unless it is essential to understand the cases. Participants may refer to information in earlier representations, but the Inspector only has copies of the representations made on the Submission version of the Plan. Further statements are not needed unless they relate to the legal requirements or soundness of the Plan, as set out in this Schedule of Matters, Issues and Questions. If they wish, participants can rely solely on their original representation(s).
4. All further statements should be received by the Programme Officer **no later than 20 February 2015**. **All material that participants wish to put before the Inspector or refer to at the hearings should be submitted by these deadlines**. The Inspector is unlikely to accept further/new information/evidence once the hearing sessions commence, since this could disrupt the progress of the hearings and disadvantage participants.
5. **Any further statements will be limited to a maximum of 3,000 words**; there are no exceptions to this approach. **The Examination process does not provide the opportunity to make further submissions or present new evidence not based on the original representations or to submit new points and material**. Participants considering submitting more extensive new evidence and reports should seek the Inspector's permission first.
6. Detailed agendas for the hearing sessions will be issued shortly before they commence, based on the Matters, Issues & Questions for Examination and the responses received. However, the Inspector is unlikely to introduce new issues or questions that do not arise from the topics and issues identified. Participants should let the Programme Officer know whether they wish to participate at a particular hearing session in line with a deadline to be set by Programme Officer. Although anyone can attend the public hearings as an observer, only those listed in the programme can participate in the relevant hearing session. **Normally, only those who seek some change to the Plan are entitled to participate in the**

<sup>1</sup> *Examining Local Plans: Procedural Practice* [PINS; December 2013]

<sup>2</sup> National Planning Policy Framework [DCLG; March 2012]

<sup>3</sup> Planning Practice Guidance [DCLG; March 2014]

<sup>4</sup> Inspector's Guidance Notes (Examination Document: PS/A003b)

**hearing sessions**, but others may be invited if they can contribute positively to the discussion or assist the Inspector.

7. The Examination will focus on legal compliance and the requirements of soundness set out in the NPPF (¶ 182). The starting point is the assumption that the Council has submitted what it considers is a sound plan. **Other participants are expected to explain which aspect of the plan is unsound, why it is unsound, and what changes are needed to the plan to make it sound, with the necessary wording and supporting evidence.** However, the Inspector will not be able to consider or recommend any changes to the Plan unless he is requested to do so by the Council.
8. As well as complying with the legal requirements, including the Duty to Co-operate, the Plan has to be positively prepared, justified, effective and consistent with national policy<sup>5</sup>. **"Positively prepared"** means the Plan should be based on a strategy which meets the objectively assessed development and infrastructure requirements, including unmet requirements from surrounding areas where it is reasonable and consistent with achieving sustainable development; **"Justified"** means the Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence; **"Effective"** means the Plan should be deliverable and based on effective joint working on cross-boundary strategic priorities; *To be consistent with national policy*, the Plan should enable the delivery of sustainable development in line with policies in the NPPF. The Examination will focus on these key requirements of soundness. The Plan should also set out **what** and **how much** development is proposed, and **where, when** and **how** it will be provided, along with the necessary justification.
9. Participants should note that any failure to fully discharge the legal requirements related to the Duty to Co-operate cannot be rectified as part of the Examination process. Furthermore, the scope for making substantial or fundamental changes to the Plan after it has been submitted to the Secretary of State is limited, particularly where they have implications for the sustainability appraisal, the consultation processes already undertaken, and the underlying strategy. "Main Modifications" can only be considered by the Inspector where they are necessary to make the Plan sound and/or legally compliant and where the Council has formally requested that such modifications be recommended. Any such proposed changes will normally be subject to the same process of publicity, opportunity to make representations and sustainability appraisal as the original Plan.
10. This Schedule of Matters, Issues & Questions for the Examination is comprehensive, since almost all policies (69) in the Plan have been challenged. However, not all matters and issues will be discussed at the hearing sessions; this will partly depend on who wishes to participate at the hearings, details of which will be set out in the Hearings Programme. At present, it is likely that the main matters and issues to be discussed at the hearings will cover the **Duty to Co-operate; Strategic Core Policies, including Settlement Hierarchy and Green Belt; housing requirements and land supply, distribution of development, phasing and affordable housing; Economy, including employment land requirement; Sub-Area Policies, including City of Bradford (including Shipley & Baildon), Airedale, Wharfedale and South Pennine Towns & Villages; and Policies covering Transport, Environment, Minerals & Waste Management, Design and Implementation and Delivery.**
11. In terms of the content of the discussions under the various Matters, participants should note the following parameters:
  - *Duty to Co-operate (DTC): points relating to the DTC raised in representations on other policies (eg. Policies SC3, SC7, HO1 etc) will be dealt with under Matter 1;*
  - *Hierarchy of Settlements: points relating to the status/position of particular settlements in the hierarchy will be dealt with under Matter 3;*
  - *Location of Development: general points relating to the general principles and approach to the location of development will be dealt with under Matter 3; detailed*

---

<sup>5</sup> National Planning Policy Framework (¶ 182) [DCLG; March 2012]

*points about the location of development in particular areas will be dealt with under Matter 6;*

- *Green Belt: general points relating to the general principles and approach to the Green Belt will be dealt with under Matter 3; detailed points about the release of particular areas of Green Belt will be dealt with under Matter 6;*
- *Overall development strategy will be dealt with under Matter 3; issues relating to the employment and housing strategy will be covered under Matters 4 & 5.*
- *Housing: general points about the objective assessment of housing need and the strategic sources of housing supply will be dealt with under Matters 4A and 4B;*
- *Housing distribution: general and detailed points about the distribution of housing development to the various sub-areas and settlements will be dealt with under Matter 4C;*
- *This is a strategic plan, which makes no specific site allocations; therefore specific sites will not be discussed; However, in some cases, specific areas/sites are referred to (eg, Holme Wood Urban Extension), and detailed discussions on this topic will be dealt with under Matter 6A;*

12. All evidence and material relevant to the representations should have been submitted at the consultation stage. Participants should note that the hearing sessions are intended to discuss issues related to the soundness and legal compliance of the plan, rather than discussing individual representations or giving an opportunity for a full presentation of participants' cases. Participants who consider the Council has not fully discharged its legal requirements under the Duty to Co-operate should clearly indicate how the Council has failed this duty; those challenging the development strategy and overall housing and employment provision should clearly explain why the Council's approach is unsound.
13. Where agents or consultants have submitted identical or similar representations on behalf of several clients, only one further statement is needed for the hearings if similar points are being made on behalf of several clients. If further statements cover several matters or issues, they should be drafted in a form where each matter or issue is separately identified.
14. This Schedule of Matters, Issues & Questions is based on current national planning policy (*as at 23 January 2015*). Since the Plan was published for consultation, the Government has issued Planning Practice Guidance<sup>6</sup>, which the Inspector will take into account when considering the legal compliance and soundness of the Plan. If further announcements are made about national or local planning policy or the scope and nature of the examination, the agenda and content of the Matters and Issues for Examination may need to be amended. Participants should keep up-to-date with the latest situation by checking the Council's Examination website<sup>7</sup>.
15. In carrying out this Examination, the Inspector will aim to work in a proactive, pragmatic and consensual manner with the Council and other participants, with the aim of delivering a positive outcome. He will expect all participants to act in a similarly co-operative manner, adopting a positive approach to the examination process. Any queries that participants wish to raise should be addressed to the Programme Officer.

---

<sup>6</sup> Planning Practice Guidance [DCLG; March 2014]

<sup>7</sup> [http://www.bradford.gov.uk/bmdc/the\\_environment/planning\\_service/local\\_development\\_framework/core\\_strategy\\_dpd\\_examination.htm](http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/core_strategy_dpd_examination.htm)



**BRADFORD LOCAL PLAN CORE STRATEGY - EXAMINATION**  
**SCHEDULE OF MATTERS, ISSUES AND QUESTIONS FOR EXAMINATION**

**MATTER 1: LEGAL REQUIREMENTS & PROCEDURAL MATTERS**

**Key issues:**

- 1.1 Has the Plan had regard to and been prepared in accordance with the current **Local Development Scheme, Statement of Community Involvement, Sustainable Community Strategy, Local Development Regulations** and **national planning policy**<sup>8</sup>, including the National Planning Policy Framework (NPPF)? Are there any outstanding issues relating to the consultation arrangements?
- 1.2 Has the Plan been subject to **Sustainability Appraisal**, including a final report on the published plan, and **Habitat Regulations Assessment**?
- a. Is it clear how the Sustainability Appraisal influenced the final plan and dealt with mitigation measures?
- b. Are there any outstanding issues arising from the evidence and approach of the HRA, including from Natural England, RSPB and other parties and, if so, how will these be resolved?
- 1.3 Has the Plan been prepared in accordance with the **Duty to Co-operate**, particularly in terms of whether the Council has discharged its duty to maximise the effectiveness of the plan-making process and co-operated and engaged with neighbouring local authorities and prescribed bodies on an on-going basis with regard to strategic matters, including development and infrastructure requirements and other cross-boundary issues and strategic priorities<sup>9</sup>, and is the approach fully justified, including:
- i. **Housing requirements**, including specific discussions about sub-regional housing needs, cross-boundary housing provision, meeting any unmet housing needs of adjoining areas, and the implications of proposed urban extensions, and the outcome of these discussions;
- ii. **Economic issues and employment land requirements**, including specific discussions and strategic cross-boundary employment and economic issues, employment land provision, regeneration issues, travel-to-work areas, socio-economic linkages and commuting issues, and the outcome of these discussions;
- iii. **Green Belt**, including specific discussions about strategic cross-boundary issues relating to the proposals to amend Green Belt boundaries and adopting a consistent approach across the sub-region, and the outcome of these discussions;
- iv. **Highways, transport and infrastructure issues**, including specific discussions about proposed strategic highways and transport infrastructure, the impact of proposed development on the strategic highway network outside Bradford, public transport connections, Leeds/Bradford airport and flood risk, and the outcome of these discussions ;
- v. **Gypsies and travellers**, including specific discussions about meeting any unmet needs of adjoining authorities, and the outcome of these discussions;
- vi. **Environment**, including specific discussions about the impact of the proposed development strategy on protected international sites and heritage assets outside Bradford, and the outcome of these discussions;
- vii. **Minerals and waste management issues**, including specific discussions about strategic provision of minerals and waste management facilities and cross-boundary minerals and waste management issues, including minerals provision levels for Bradford and import/export of minerals, and the relationship with waste management facilities in neighbouring areas, and the outcome of these discussions;
- viii. **Other strategic issues**, including specific discussions about issues with cross-boundary implications and the outcome of these discussions;
- ix. **Neighbouring authorities:** are all neighbouring authorities satisfied that Bradford MDC has fully met the DTC requirements, and is there evidence to confirm the situation? Are there any outstanding or unresolved issues relating to the DTC?
- x. **Other prescribed bodies**, including:
- a. **Environment Agency**, with regard to flood risk and water management;
- b. **Natural England**, with regard to Habitat Regulations Assessment and the impact of proposed development on protected sites outside Bradford;

<sup>8</sup> Detailed aspects of consistency with national policy, including the National Planning Policy Framework [DCLG; March 2012], will be dealt with under later topics and issues

<sup>9</sup> The Council has prepared a Duty to Co-operate Statement [Examination Document: 006]

- c. **Highways Agency/Highways Authority** and infrastructure/service providers, with regard to the impact of proposed development on the strategic highway network (including M606 junctions) and infrastructure/service provision;
  - d. **English Heritage**, including impact of development proposals on the historic environment and specific heritage assets outside Bradford;
  - e. **Leeds City Region Local Enterprise Partnership**, including specific discussions and consistency of the BCSP with the LEP Strategic Economic Plan;
  - xi. The current state of play on various **Memoranda of Understanding/Statements of Common Ground** and other agreements with neighbouring authorities and prescribed bodies.
- 1.4 Has the Council reviewed the Plan and its preparation against the latest guidance in the PPG<sup>10</sup> (March 2014 as updated), and are there any outstanding issues?
- 1.5 What is the latest position on any **Proposed Changes** that the Council wishes to make to the submitted Plan?

## **MATTER 2: SPATIAL VISION AND STRATEGIC OBJECTIVES**

### ***Key issue:***

***Is the Spatial Vision for Bradford justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the Plan, and are the Strategic Objectives appropriate, effective, justified and soundly based, and will they help to deliver the spatial vision of the Plan?***

### **2.1 Spatial Vision:**

- a. Does the Vision set out an appropriate, justified, effective and locally distinctive Spatial Vision for the future development of Bradford over the plan period in a clear and positive manner, providing a sound basis for the strategic policies in the Plan and giving sufficient strategic direction for the area to 2030, with an appropriate balance between economic growth, sustainable development, infrastructure requirements, environmental and social matters, and between brownfield and greenfield sites;
- b. Should the plan period be extended beyond 2030?

### **2.2 Strategic Objectives:**

- a. Does the Plan identify all the relevant Strategic Objectives, including those which have cross-boundary implications, and should any of the strategic priorities be amended to reflect the concerns of consultees?

## **MATTER 3: STRATEGIC CORE POLICIES**

**including: Policy SC1 (Overall approach); Policy SC4 (Settlement Hierarchy); Policy SC5 (Location of Development); Policy SC7 (Green Belt) and Policy SC8 (South Pennine Moors)**

### ***Key issue:***

***Is the Overall Approach and Key Spatial Priorities, the justification for the proposed Settlement Hierarchy, the principles of location of development, the general approach to the Green Belt, for Bradford, and the approach to development proposals in the South Pennine Moors Zone of Influence soundly based, effective, appropriate, deliverable, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with the latest national policy?***

### **3.1 Policy SC1 – Overall approach and key spatial priorities**

- a. How does the policy identify appropriate spatial priorities, and where is the justification and evidence?
- b. Does the policy properly consider infrastructure requirements, regeneration implications, and the need for a balanced distribution of development?

<sup>10</sup> Planning Practice Guidance [DCLG; March 2014 as updated]

### 3.2 **Policy SC4 – Settlement Hierarchy**

- a. Is the Settlement Hierarchy for each town and settlement appropriate, effective, locally distinctive, justified and soundly based, and is it positively prepared and consistent with the latest national policy?
- b. What is the basis of the proposed Settlement Hierarchy, and is it based on up-to-date and reliable evidence?
- c. Is the status of various settlements (eg, Ilkley, Burley-in-Wharfedale) in the settlement hierarchy fully justified and soundly based; and are the various criteria of each level of the hierarchy appropriate and fully justified?

### 3.3 **Policy SC5 – Location of Development**

- a. What is the justification for setting the priorities and criteria for locating new development; is it supported by evidence, appropriate and soundly based?
- b. Does the policy make the appropriate balance between prioritisation of brownfield land, use of brownfield land and windfalls, and greenfield land, and safeguarded land?
- c. How will sites be assessed and are the accessibility standards inflexible?

### 3.4 **Policy SC7 – Green Belt**

- a. Is the proposed approach to the Green Belt appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy (NPPF; ¶ 84), particularly in terms of:
  - i. identifying the exceptional circumstances necessary for using Green Belt land;
  - ii. demonstrating the need to promote sustainable patterns of development, including the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (NPPF; ¶ 84);
- b. Whether there should be a full or selective review of the Green Belt, and would such a review be co-ordinated and agreed with neighbouring authorities?
- c. What evidence is available to justify decisions to release particular areas of Green Belt for development?
- d. Should the Green Belt review also include Safeguarded Land?

### 3.5 **Policy SC8 – South Pennine Moors**

- a. Is the approach towards new development with the South Pennine Moors and their Zone of Influence appropriate, effective, positively prepared, justified, soundly based and consistent with the latest national policy?
- b. Is the HRA evidence soundly based and are there any outstanding issues from Natural England?

---

## **MATTER 4A – HOUSING REQUIREMENT**

### **Policy HO1 – The District’s Housing Requirement**

#### ***Key issue:***

***Has the Council undertaken its objective assessment of housing need in line with the latest national guidance and good practice (NPPF/PPG)***

#### **4.1 Policy HO1 – The District’s Housing Requirement**

- a. How has the Council undertaken an objective assessment of housing needs for Bradford, which is justified by robust and proportionate evidence and has been positively prepared, taking account of all the relevant factors, and does the Plan fully meet the objectively assessed needs for market and affordable housing in Bradford, along with any unmet housing requirements from neighbouring authorities, including:
  - i. The Plan proposes to provide at least 42,100 homes (2013-2030). What is the basis, justification, assumptions and methodology for the proposed level of housing provision, having regard to the supporting evidence (including the SHMA & SHLAA, Housing Requirement Study (August 2013 update), Housing Background Paper<sup>11</sup>), recent population/household projections (including the 2008/2011-based household projections and 2012 sub-national population projections), demographic change, migration, household formation rates, housing market area, key housing drivers, housing demand and market signals, the need for affordable housing and

---

<sup>11</sup> Housing Background Paper 2 (February 2014); Examination Document (16)



- the relationship with the economic strategy, in line with the guidance in the NPPF (¶ 14, 17, 47-55; 159) and Planning Practice Guidance (ID: 2a/3)?
- ii. What is the current and future 5, 10 & 15-year housing land supply position, including existing commitments, future proposed provision, allowance for windfalls, phasing, balance between brownfield and greenfield sites, and provision identified in the latest SHLAA; and how will the proposed housing provision be effectively delivered?
  - iii. How does the Plan address the need for a 5/20% buffer to 5-year housing land supply, as required by the NPPF (¶ 47) to significantly boost housing supply, and how does it address previous shortfalls in housing provision, both during and before the current Plan period?
  - iv. How does the Plan address previous backlogs in housing provision?
  - v. Is the allowance for vacant dwellings fully justified with evidence?
  - vi. How will the Plan fully meet the need for affordable housing (c.587 units/year)?
- b. Has the overall housing provision level been set too high or too low?
  - c. What alternative levels of housing provision have been considered, having regard to any significant and demonstrable adverse impacts of proposing increased levels of housing provision within Bradford; what would be the basis and justification for any alternative level of housing provision?
  - d. How does the objective assessment of housing needs relate to the employment and jobs strategy?
  - e. Does Policy HO1 effectively address cross-boundary housing issues, including the relationship with the Leeds City Region, in line with the NPPF (¶ 178-181), and has it taken into account the housing and economic strategies, plans, priorities and projects of adjoining local authorities and other bodies/agencies?
- 

#### **MATTER 4B: HOUSING SUPPLY**

##### **Policy HO2 – Strategic Sources of Housing Supply**

***Key issue:***

***Is the approach to identifying the strategic sources of housing supply fully justified with up-to-date and reliable evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?***

##### **4.2 Policy HO2 – Strategic Sources of Housing Supply**

- a. Is there sufficient evidence to justify the main strategic sources of housing supply, including completions and commitments, former RUDP sites, including safeguarded land, new deliverable/developable sites, area-based initiatives including Growth Areas, including Urban Eco-Settlement in Shipley/Canal Road Corridor, Bradford City Centre, SE Bradford, Queensbury, Thornton, Silsden and Steeton with Eastburn, Holme Wood Urban Extension, and local Green Belt releases;
  - b. Is the policy founded on an up-to-date, accurate and comprehensive assessment of housing land availability, including SHLAA?
  - c. Is a better strategic framework needed for designated Growth Areas?
- 

#### **MATTER 4C: HOUSING REQUIREMENTS**

##### **Policy HO3 – Distribution of the Housing Requirement**

***Key issue:***

***Is the approach to the distribution of housing development to the various towns and settlements in Bradford fully justified with evidence, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?***

##### **4.3 Policy HO3 – Distribution of Housing Development**

- a. Is there sufficient evidence available to justify the proposed distribution of housing development to the various towns and settlements in Bradford; and is the proposed distribution supported by the evidence?
- b. Does the policy pay sufficient regard to viability considerations?
- c. Does the policy pay sufficient regard to the infrastructure requirements (especially

- highways and transport modelling)?
- d. Does the policy pay sufficient regard to constraint policies (especially in Airedale & Wharfedale)
  - e. Are the various proportions/amounts of housing development proposed for each for the towns and settlements fully justified with evidence?

## **MATTER 4E: HOUSING PROVISION**

### **Policy HO7 – HOUSING SITE ALLOCATION PRINCIPLES**

***Key issue:***

***Is the Council's approach to establishing housing site allocation principles consistent with national guidance (NPPF/PPG)?***

#### **4.4 Policy HO7 – Housing Site Allocation Principles:**

- a. Is the approach to establishing housing site allocations, including the various criteria, supported by evidence, and is it effective, clear and soundly-based?
  - b. Does the policy properly consider the balance between homes and jobs, and between prioritising brownfield against greenfield land?
  - c. Does the policy recognise Green Belt constraints and regeneration issues?
  - d. Does the policy consider maximising environmental benefits and minimising environmental impact?
- 

## **MATTER 4F – AFFORDABLE HOUSING**

### **Policy HO11 – AFFORDABLE HOUSING**

***Key issue:***

***Is the Council's approach to affordable housing consistent with the latest national guidance (NPPF/PPG)?***

#### **4.5 Policy HO11 - Affordable Housing :**

- a. Is the approach to providing affordable housing appropriate, soundly based, justified with robust evidence, effective, deliverable, viable and consistent with national policy, particularly in terms of:
    - i. The latest Strategic Housing Market Assessment indicates an annual net shortfall of 587 affordable homes. How will this number of affordable housing be delivered, including the size, type and tenure of affordable housing and the means of meeting the objectively assessed need for affordable housing?
    - ii. Policy HO11 sets targets for affordable housing of up to 30% in Wharfedale, up to 20% in towns, suburbs and villages, up to 15% in inner Bradford and Keighley, with site size thresholds of 15 dwellings (0.4ha) generally, lowered to 5 dwellings in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Hardern, Wilsden and Cottingley. Are these thresholds and targets fully justified and supported by an informed robust assessment of economic viability, and is there sufficient flexibility? Is the proposal to reduce site thresholds in certain areas consistent with the Government's recent announcement that lower thresholds should only apply in designated rural areas?
    - iii. Is the requirement to provide viability assessments to demonstrate that alternative affordable housing should be provided unduly onerous, inflexible and consistent with the latest national policy?
    - iv. Is the policy effective in terms of actually delivering affordable housing?
    - v. Does the policy consider viability issues of providing affordable housing, or is it unduly onerous?
    - vi. Apart from delivering new affordable housing as a contribution from market housing schemes, what other measures will be available to deliver affordable housing through other means (eg, 100% schemes; RSL providers)?
  - b. Is the approach to Rural Affordable Housing consistent with the latest national guidance (NPPF/PPG), including the threshold for affordable housing in rural areas?
-

## **MATTER 5 – ECONOMY & JOBS**

### **POLICY EC1 – CREATING A SUCCESSFUL AND COMPETITIVE ECONOMY**

### **POLICY EC2 – SUPPORTING BUSINESS AND JOB CREATION**

### **POLICY EC3 – EMPLOYMENT LAND REQUIREMENT**

### **POLICY EC4 – SUSTAINABLE ECONOMIC GROWTH**

### **POLICY EC5 – CITY, TOWN, DISTRICT AND LOCAL CENTRES**

#### **Key issue:**

***Does the Plan set out a clear, effective and soundly based economic strategy which positively and proactively encourages sustainable enterprise and economic growth, and are the policies for economic prosperity, rural economy, employment land, city, town, district and local centres appropriate for Bradford, supported by a robust, credible and up-to-date evidence base and consistent with the latest national policy?***

#### **5.1 Policy EC1 – Creating a Successful and Competitive Economy:**

- a. Is there sufficient evidence to justify the criteria and requirements for investment and planning decisions to deliver the particular economic benefits, as set out in the policy?
- b. Is the economic strategy appropriate, justified, effective, positively prepared, soundly based and consistent with the Leeds City Region LEP's economic growth strategy?
- c. Is the approach in line with national policy (NPPF/PPG)?
- d. Does the policy give sufficient preference to supporting the rural economy, including agricultural and rural businesses, and to the tourism economy?

#### **5.2 Policy EC2 – Supporting Business and Job Creation:**

- a. What is the basis for the proposed delivery of at least 2,897 jobs per year; is it justified by evidence and is it effective, deliverable and consistent with the latest national guidance (NPPF/PPG)?
- b. What is the relationship between the delivery of 2,897 jobs per year and the housing target supporting some 1,600 jobs/year?
- c. How will this number of jobs actually be created and delivered?

#### **5.3 Policy EC3 – Employment Land Requirement:**

- a. What is the basis and justification for the employment land requirement for 135ha of employment land, is this effective and deliverable, and is it consistent with the latest national guidance (NPPF/PPG)?
- b. What is the basis and justification for the proposed distribution of employment land to the specific areas listed and the sources of supply identified, including the areas of search for high quality employment locations?
- c. Has the policy considered the detailed impact of employment land provision on particular communities, including Wharfedale?
- d. Has the policy properly considered the impact on roads and traffic congestion (including M602 and junctions), accessibility, the need to use brownfield land, infrastructure requirements, the environment, and the need to balance housing with employment land provision?

#### **5.4 Policy EC4 – Sustainable Economic Growth:**

- a. Is the approach to assessing proposals in terms of sustainable economic development, including the criteria and requirements set out, consideration of proposals for alternative development on employment land, identifying Strategic Employment Zones and requiring BREEAM standards to be met, effective, deliverable and consistent with the latest national guidance (NPPF/PPG)?
- b. Is the approach to protecting existing employment sites, including the key employment areas and sites identified and the criteria for permitting alternative uses, appropriate, justified, effective, soundly based and consistent with national guidance (NPPF/PPG)?
- c. Does the policy consider accessibility, viability, regeneration and infrastructure requirements?
- d. Does the policy give sufficient support for agricultural and rural businesses?

#### **5.5 Policy EC5 – City, Town, District and Local Centres:**

- a. Does Policy EC5 provide an appropriate, effective and soundly based framework for establishing the hierarchy of retail centres in Bradford and for maintaining and enhancing the roles, functions, viability and vitality of the City, Town, District and Local Centres, including the locational and other criteria, which is justified with evidence and consistent with national policy?

- b. Is there sufficient evidence to justify the proposed hierarchy of centres?
- c. Should the policy or accompanying text indicate the capacity for additional town centre and retail development in the main towns and service centres, having regard to the Retail & Leisure Studies and NPPF (¶ 23); and should the boundaries of town centres and primary shopping areas be defined in this Plan?
- d. Are the thresholds for impact assessments and sequential assessments justified by evidence, and is the approach of the policy effective, positively prepared, soundly based and consistent with national guidance (NPPF/PPG)?

---

## **MATTER 6: SUB-AREA POLICIES**

### ***Key issue:***

***Does the Plan set out a clear, effective and soundly based framework for the Sub-Areas of Bradford, Airedale, Wharfedale and the South Pennine Towns and Villages, which is appropriate for the area, effective, positively prepared, supported by a robust, credible and up-to-date evidence base and consistent with national policy?***

## **MATTER 6A – SUB-AREA POLICIES**

**POLICIES BD1-BD2 – CITY OF BRADFORD INCLUDING SHIPLEY & LOWER BAILDON , including Strategic Pattern of Development, Urban Regeneration and Renewal Priorities, Peripheral Communities and Growth Areas, including South-East Bradford, including Holme Wood urban extension, North-East Bradford, North-West Bradford and South-West Bradford**

### **6.1 Strategic Pattern of Development:**

- a. Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?
- b. Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

### **6.2 Urban Regeneration and Renewal Priorities:**

- a. Is there sufficient justification and evidence to support the specific proposals for development, including at **Bradford City Centre** and **Shipley/Canal Road Corridor**? Has the policy considered the regeneration, environmental, viability, use of brownfield land, impact on heritage assets and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Is the proposed policy approach to peripheral communities, including the specific villages listed, justified, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

### **6.3 Growth Areas:**

#### **a. South-East Bradford:**

- i. Is there sufficient justification and evidence to support the proposals for South-East Bradford, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- ii. **Holme Wood Urban Extension:** Is there sufficient justification and evidence to support the proposals for the Holme Wood Urban Extension, including the exceptional circumstances necessary to release Green Belt land, the impact on existing uses, historic/heritage assets, landscape and regeneration, the need for additional infrastructure, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

#### **b. North-East Bradford:**

- i. Is there sufficient justification and evidence to support the proposals for North-East Bradford, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- ii. Is there sufficient evidence to justify the need for some local Green Belt changes?

#### **c. North-West Bradford:**

- i. Is there sufficient justification and evidence to support the proposals for North-West Bradford, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

d. **South-West Bradford:**

- i. Is there sufficient justification and evidence to support the proposals for South-West Bradford, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

e. **Economic Development:**

- i. Is there sufficient justification and evidence to support the proposals for economic development in the Regional City of Bradford, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- ii. What is the specific justification for the specific proposals identified in Bradford City Centre, South Bradford, Shipley Town Centre and Saltaire, and are these backed up with available evidence?

f. **Environment:**

- i. Is there sufficient justification and evidence to support the proposals to improve the environment, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

g. **Transport:**

- i. Is there sufficient justification and evidence to support the transport proposals, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- ii. What is the specific justification for the specific transport proposals identified, and are these deliverable and backed up with available evidence?

h. **Outcomes:**

- i. Is there a reasonable or realistic prospect of the Outcomes set out in the Plan (¶ 4.1.1-4.1.11) actually being delivered by the end of the Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?

---

**MATTER 6B – SUB-AREA POLICIES - AIREDALE**  
**POLICIES AD1-AD2 – AIREDALE**

6.4 **Strategic Pattern of Development:**

- a. Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?
- b. Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

6.5 **Urban Regeneration and Renewal:**

- a. Is there sufficient justification and evidence to support the specific proposals for development at **Keighley**, including the need to release Green Belt land and the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, impact on heritage assets and local communities, and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Is there sufficient justification and evidence to support the specific proposals for development at **Bingley**, including the need for some local release of Green Belt land and the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, impact on heritage assets, landscape and local communities, the balance between housing and employment land, and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- c. Is there sufficient justification and evidence to support the specific proposals for development at **Silsden**, including the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- d. Is there sufficient justification and evidence to support the specific proposals for development at **Steeton with Eastburn**, including the need for some local release of Green Belt land and the specific projects listed, and has the policy considered the

regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

- e. Is there sufficient justification and evidence to support the specific proposals for development at **Baildon**, including the need for some local release of Green Belt land, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- f. Is there sufficient justification and evidence to support the specific proposals for development at **Cottingley** and **East Morton**, including the need for some local release of Green Belt land, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance between housing and employment land, impact on heritage assets, landscape and local communities, and infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

#### 6.6 **Economic Development:**

- a. Is there sufficient justification and evidence to support the principle that Keighley and Bingley will be the principal focus for indigenous economic development, including the specific sites identified?
- b. Is there sufficient evidence to justify the specific sites and proposals identified?
- c. Does the Policy adequately consider the role of tourism development and the impact of economic development on heritage/tourist assets?

#### 6.7 **Environment:**

- a. Is there sufficient justification and evidence to support the proposals to improve the environment, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

#### 6.8 **Transport:**

- a. Is there sufficient justification and evidence to support the transport proposals, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. What is the specific justification for the specific transport proposals identified, including the Airedale Transport Improvement Project and improvement of key transport corridors?

#### 6.9 **Outcomes:**

- a. Is there a reasonable or realistic prospect of the Outcomes set out in the Plan (¶ 4.2.1-4.2.5) actually being delivered by the end of the Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?

---

### **MATTER 6C – SUB-AREA POLICIES – WHARFEDALE** **POLICIES WD1-WD2 – WHARFEDALE**

#### 6.10 **Strategic Pattern of Development:**

- a. Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?
- b. Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

#### 6.11 **New Development Locations:**

- a. Is there sufficient justification and evidence to support the specific proposals for development at **Ilkley**, including urban redevelopment and the need to release Green Belt land and the specific projects listed, and has the policy considered the regeneration, environmental, viability, use of brownfield land, the balance of housing and employment land, impact on heritage assets and local communities, and infrastructure requirements, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Is there sufficient justification and evidence to support the proposed housing

development at **Addingham**, limited to meeting local need, and has the policy considered the infrastructure requirements and local facilities, and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

- c. Is there sufficient justification and evidence to support the specific proposals for development at **Burley-in-Wharfedale**, including the need to release some local Green Belt land and the specific projects listed, and has the policy considered the infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)? Could this settlement take more housing development?
- d. Is there sufficient justification and evidence to support the specific proposals for development at **Menston**, limited to existing permissions and other opportunities within the settlement boundary, has the policy considered the infrastructure requirements (including transport and education facilities), and is it clear, effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)? Could this settlement take more housing development?

**6.12 Economic Development:**

- a. Is there sufficient justification and evidence to support the roles of **Ilkley, Burley-in-Wharfedale, Addingham and Menston** in economic terms?

**6.13 Environment:**

- a. Is there sufficient justification and evidence to support the proposals to improve the environment, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

**6.14 Transport:**

- a. Is there sufficient justification and evidence to support the transport proposals, including transport improvements and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

**6.15 Outcomes:**

- a. Is there a reasonable or realistic prospect of the Outcomes set out in the Plan (¶ 4.3.1-4.3.4) actually being delivered by the end of the Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?

---

**MATTER 6D – SUB-AREA POLICIES – SOUTH PENNINE TOWNS & VILLAGES**  
**POLICIES PN1-PN2 – SOUTH PENNINE TOWNS & VILLAGES**

**6.16 Strategic Pattern of Development:**

- a. Is there sufficient justification and evidence to support the broad distribution of development as set out in Part A of the Policy?
- b. Is this element of the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

**6.17 Housing and Economic Growth:**

- a. Is there sufficient evidence to justify the proposed strategy for new development in the **South Pennine Towns & Villages**, including the specific Local Growth Centres and Local Service Centres identified, including the need for both significant and some local Green Belt changes, and is the policy effective, positively prepared, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Has the Policy properly considered the impact of new development on meeting Bradford's housing needs, use of brownfield land, impact on the landscape and moorland setting and heritage/tourist assets, balance between housing and employment land, and infrastructure requirements?

**6.18 Economic Development:**

- a. Is there sufficient justification and evidence to support the role of these towns and villages in economic terms, including supporting sustainable tourism related to the Bronte heritage and Keighley & Worth Valley Railway?

**6.19 Environment:**

- a. Is there sufficient justification and evidence to support the proposals to improve the environment, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

**6.20 Transport:**

- a. Is there sufficient justification and evidence to support the transport proposals, including transport improvements, and is the policy effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

**6.21 Outcomes:**

- a. Is there a reasonable or realistic prospect of the Outcomes set out in the Plan (¶ 4.4.1-4.4.5) actually being delivered by the end of the Plan period, and what measures are in place to monitor success or enable contingencies to be put in place?

---

**MATTER 7 – OTHER POLICIES, including  
STRATEGIC CORE POLICIES, including SC2, SC3, SC6, SC9  
HOUSING, including Policies HO4-HO6, HO8-HO10  
TRANSPORT AND MOVEMENT, including Policies TR1-TR5  
ENVIRONMENT, including Policies EN1-EN8  
MINERALS, including Policies EN9-EN12  
WASTE MANAGEMENT, including Policies WM1-WM2  
DESIGN, including Policies DS1-DS5**

**Key issue:**

***Does the Plan provide a clear, effective and soundly based framework for working together, managing housing delivery, promoting sustainable transportation, protecting, maintaining and enhancing the high quality environment within Bradford, ensuring an adequate supply of sustainable minerals and waste management, and achieving good design, which is fully justified with evidence, positively prepared and consistent with the latest national policy?***

**MATTER 7A: STRATEGIC CORE POLICIES**

**Policy SC2 – Climate Change and Resource Use**

**Policy SC3 – Working Together**

**Policy SC6 – Green Infrastructure**

**Policy SC9 – Making Great Places**

**7.1 Policy SC2 – Climate Change and Resource Use**

- a. Is the approach to Climate Change and Resource Use, including the specific requirements set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Is the policy unduly onerous and inflexible, and does it take into account viability considerations and the recent national consultation about how the Government intends to deal with many of the code standards through the Building Regulations?

**7.2 Policy SC3 – Working Together**

- a. Is the approach to Working Together, including the specific supportive measures set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

**7.3 Policy SC6 – Green Infrastructure**

- a. Is the approach to Green Infrastructure, including specific sub-regional drivers, specific locations and definition of Green Infrastructure set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

**7.4 Policy SC9 – Making Great Places**

- a. Is the approach to Making Great Places, including the specific measures set out, fully justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance?-

---

**MATTER 7B: MANAGING HOUSING DELIVERY and GYPSIES & TRAVELLERS**

**Policy HO4 – Phasing and Release of Housing Sites**

**Policy HO5 – Housing Density**

**Policy HO6 – Previously Developed Land**

**Policy HO8 – Housing Mix**

**Policy HO9 – Housing Quality**

**Policy HO10 – Overcrowding and Empty Homes**



## **Policy HO12 – Sites for Travellers & Travelling Showpeople**

### **7.5 Policy HO4 – Phasing & Release of Housing Sites**

- a. What is the justification for the Council's proposed approach to phasing and releasing housing sites?
- b. Is the approach to phasing in line with national guidance (NPPF; ¶ 47)?
- c. Would the phasing approach lead to shortfalls in housing provision, putting at risk 5-year housing land supply?
- d. Does the proposed approach to phasing properly recognise infrastructure requirements (including cross-boundary infrastructure requirements)?

### **7.6 Policy HO5 – Housing Density**

- e. Is the approach to housing density in accordance with national policy?
- f. Would the proposed approach adversely affect 5-year housing supply?
- g. Should the policy introduce more flexibility to address viability and other considerations?
- h. Is there sufficient evidence to justify the specific density targets for particular areas?

### **7.7 Policy HO6 – Previously Developed Land**

- i. Is the Council's approach to prioritising development on Previously Developed Land consistent with the latest national guidance in the NPPF/PPG?
- j. Will the proposed targets stifle development and undermine meeting housing need and supply?
- k. Are the proposed targets fully justified with available evidence?
- l. Do the proposed targets properly reflect viability considerations, or should the policy provide more flexibility to ensure that it is effective?

### **7.8 Policy HO8 – Housing Mix**

- a. Is the Council's approach on housing mix consistent with the latest national guidance in the NPPF/PPG?
- b. Is the approach justified by evidence, in an up-to-date, comprehensive and accurate SHMA?
- c. Are the size thresholds too high or too low?
- d. Does the policy consider viability issues and is it policy effective or unduly onerous for developers?

### **7.9 Policy HO9 – Housing Quality**

- a. Is the Council's approach to housing quality consistent with the latest national guidance (NPPF/PPG), particularly with the recent national consultation about how the government intends to deal with many of the code standards through the Building Regulations?
- b. Does the policy properly consider the viability implications of requirements of specific codes on new developments;
- c. Is the policy too onerous and detrimental to new developments, (including viability) and would it benefit from some further flexibility.

### **7.10 Policy HO10 – Overcrowding and Empty Homes**

- a. Is the Council's approach to overcrowding and empty homes, including the policy interventions set out, fully justified with up-to-date and reliable evidence on overcrowding and empty homes, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. What practical measures will be used to reduce overcrowding and bring vacant homes back into use to ensure that the Policy is deliverable?

### **7.11 Policy HO12 – Sites for Travellers & Travelling Showpeople**

- a. Is the approach towards making provision for gypsies and travellers, including the level of provision and the criteria for new sites, appropriate, justified, effective, positively prepared, soundly based and consistent with the latest national policy<sup>12</sup>?
- b. The Policy seems to be based on the West Yorkshire G&T Accommodation Assessment of 2008, which set out requirements to 2026. The Policy also fails to deal with transit pitches. Is there any more recent evidence or assessment of gypsy and traveller accommodation needs which could be used?

---

<sup>12</sup> Planning Policy for traveller sites[DCLG: March 2012] and subsequent ministerial statements

- c. Has the GTAA considered cross-boundary issues related to the provision of accommodation for gypsies and travellers, including the needs of neighbouring local authorities in the Leeds City Region?-

---

## **MATTER 7C – TRANSPORT AND MOVEMENT**

### **Policy TR1 – Travel Reduction and Modal Shift**

### **Policy TR2 – Parking Policy**

### **Policy TR3 – Public Transport, Cycling and Walking**

### **Policy TR4 – Transport and Tourism**

### **Policy TR5 – Improving Connectivity and Accessibility**

#### **7.12 Policy TR1 – Travel Reduction and Modal Shift**

- a. Are the measures set out in the policy to reduce the demand for travel, encourage and facilitate the use of sustainable travel modes, limit travel growth, reduce congestion and improve journey time reliability justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG); does it address the relationship between the location of development, accessibility and travel?
- b. Does the policy properly consider the viability and funding of infrastructure requirements, including existing transport “pressure points” and main strategic highway network, and are the highway authorities (Highway Agency/Highway Authority) content with these matters?

#### **7.13 Policy TR2 – Parking Policy**

- a. Is the Council’s approach to parking, including the measures set out in the policy, fully justified with evidence effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Are the parking standards (Appendix 4) unduly onerous and prescriptive, and will the proposed schemes be delivered?

#### **7.14 Policy TR3 – Public Transport, Cycling and Walking**

- a. Are the measures set out in the policy to safeguard and improve public transport, walking and cycling infrastructure and services justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Are the Accessibility Standards (Appendix 3) unduly onerous and prescriptive, and will the proposed schemes identified in the policy be delivered?

#### **7.15 Policy TR4 – Transport and Tourism**

- a. Are the measures set out in the policy to support sustainable access to tourist destinations, heritage and cultural assets and leisure uses justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?

#### **7.16 Policy TR5 – Improving Connectivity and Accessibility**

- a. Are the measures set out in the policy to improve connectivity and accessibility, particularly by public transport, justified with evidence, effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Does the Policy provide a clear, effective and soundly based strategy to promote sustainable transportation, manage the demand for travel and provide transport infrastructure, which is justified, positively prepared, appropriate for Bradford and consistent with the latest national policy?
- c. Does the Policy properly consider existing traffic congestion and “pressure points”?

---

## **MATTER 7D – ENVIRONMENT**

### **Policy EN1 – Protection and Improvements in provision of Open Space and Recreation Facilities**

### **Policy EN2 – Biodiversity and Geodiversity**

### **Policy EN3 – Historic Environment**

### **Policy EN4 – Landscape**

### **Policy EN5 – Trees and Woodland**

### **Policy EN6 – Energy**

### **Policy EN7 – Flood Risk**

### **Policy EN8 – Environmental Protection**

- 7.17 **Policy EN1 – Protection and Improvements in provision of Open Space and Recreation Facilities**
- a. Is the approach to protecting and improving open space and recreational facilities fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
  - b. Are the Open Space Standards (Appendix 9) unduly onerous, prescriptive and inflexible, and do they take viability issues into account? Is the evidence appropriate, up-to-date and accurate, and is there sufficient evidence to justify the approach to Green Infrastructure, Local Greenspace, Built Recreation Facilities and Standards of Provision and Maintenance?
- 7.18 **Policy EN2 - Biodiversity and Geodiversity**
- a. Is the approach to protecting Biodiversity and Geodiversity, including North/South Pennine Moors, Locally Designated Sites, Habitats and Species outside Designated Sites and Enhancement to biodiversity fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- 7.19 **Policy EN3 – Historic Environment**
- a. Is the approach to preserving, protecting and enhancing the character, appearance, archaeological and historic value and significance of the District's designated and undesignated heritage assets and their settings fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- 7.20 **Policy EN4 – Landscape**
- a. Is the approach to conserving, managing and enhancing the diversity of landscapes within the District, including the criteria set out, fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- 7.21 **Policy EN5 – Trees and Woodland**
- a. Is the approach to preserving and enhancing the contribution that trees and areas of woodland make to the character of the District fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- 7.22 **Policy EN6 – Energy**
- a. Is the approach to maximising improvements to energy efficiency and support the development of renewable and low-carbon sources of energy, including identifying strategic low carbon and renewable energy opportunities, locational criteria and setting out local requirements for the use of decentralised energy and sustainability of buildings, fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
  - b. Should the policy set targets for renewable and low-carbon energy?
  - c. Is the policy unduly onerous and inflexible, and has it properly taken account of viability and practical issues in terms of renewable and low carbon energy provision?
- 7.23 **Policy EN7 – Flood Risk**
- a. Is the approach to flood risk, including the criteria and requirements set out in the policy fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)? Are there any outstanding issues raised by the Environment Agency and other relevant bodies or organisations?
- 7.24 **Policy EN8 – Environmental Protection**
- a. Is the approach to environmental protection, including the criteria and requirements set out in the policy relating to air quality, land, nuisance, and water environment, fully justified by evidence, is it effective, deliverable, soundly based and consistent with the latest national guidance (NPPF/PPG)?
  - b. Does the policy properly consider amenity issues, is it unduly onerous and inflexible, and has it properly taken account of viability issues?
-

## **MATTER 7E – MINERALS**

### **Policy EN9 – New and Extended Minerals Extraction Sites**

### **Policy EN10 – Sandstone Supply**

### **Policy EN11 - Sand, Gravel, Fireclay and Hydrocarbons**

### **Policy EN12 – Minerals Safeguarding**

#### **7.25 Policy EN9 - New and Extended Minerals Extraction Sites**

- a. Are the criteria and requirements for new and extended minerals extraction sites fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?

#### **7.26 Policy EN10 – Sandstone Supply**

- a. Is the approach to sandstone supply, including the requirements and criteria set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Does the policy make sufficient provision for the extraction of sandstone and aggregates, supported by evidence and consistent with a Local Aggregates Assessment, regional/sub-regional guidelines and national policy (NPPF; ¶ 145); and should the policy specify the overall levels of minerals provision?
- c. NPPF (¶ 143-147; 163) sets out requirements for local plans to ensure a steady and adequate supply of aggregates, including the preparation of an annual Local Aggregate Assessment, to determine the level of minerals provision; nowhere in this section of the Plan is there any indication of the required scale of minerals provision over the plan period, or the existing situation in terms of minerals provision and landbanks. Given the absence of any subsequent minerals-specific topic DPD, is this consistent with the requirements of national policy on minerals provision?

#### **7.27 Policy EN11 - Sand, Gravel, Fireclay and Hydrocarbons**

- a. Is the approach to sand, gravel, fireclay and hydrocarbons, including the criteria and requirements set out for sand and gravel and clay extraction, coal extraction, fireclay extraction, the exploration, appraisal and commercial production of oil or gas resources, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Should the policy include minerals provision levels, based on the latest Local Aggregate Assessment, in order to provide a sound framework for the provision of sand and gravel within the District?
- c. Has the Plan been positively prepared in terms of addressing cross-boundary minerals provision issues with neighbouring Mineral Planning Authorities, including any outstanding issues relating to minerals provision, including cross-boundary minerals issues such as import/export of minerals and unmet mineral provision needs from neighbouring authorities?

#### **7.28 Policy EN12 – Minerals Safeguarding**

- a. Is the approach to minerals safeguarding, including the criteria and requirements within the Sandstone and Coal and Sand and Gravel Minerals Safeguarding Areas, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Is there sufficient evidence to justify the location and extent of the Minerals Safeguarding Areas (Coal MSA; Sand & Gravel MSA; Sandstone MSA) shown in Appendix 13 of the Plan?

---

## **MATTER 7F – WASTE MANAGEMENT**

### **Policy WM1 – Waste Management**

### **Policy WM2 – Waste Management**

#### **7.29 Policy WM1 – Waste Management**

- a. Is the approach to waste management, including the use of the waste hierarchy, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?
- b. Does Policy WM1 and the accompanying text provide a sound, effective and sufficient policy framework for the sustainable management of waste and provision of waste management facilities, in line with the principles of the waste hierarchy and waste minimisation, which is consistent with the Municipal Waste Management Strategy and national policy?

- c. Latest national guidance on waste management (PPG:28-022-20141016) indicates that Local Plans should contain evidence about the waste management capacity in an area, with an understanding of capacity gaps and forecasts of future waste management capacity to deal with forecast waste arisings. Apart from some targets for Policy WM1, there are no figures of existing and future waste arisings and no figures of existing and future waste management capacity, or any details of any cross-boundary waste management issues to set the strategic framework for the forthcoming Waste Management DPD. Further clarification and information on these matters is needed.

**7.30 Policy WM2 – Waste Management**

- a. Is the approach to waste management, including the priorities and criteria for new waste management sites, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?
  - b. Do Policy WM2 and the accompanying text provide sufficient strategic guidance and spatial direction for making decisions on planning applications for waste management facilities and providing the context for the subsequent Waste Management DPD?
  - c. Has the Plan been positively prepared in terms of addressing cross-boundary waste management issues with neighbouring Waste Planning Authorities, ensuring that there are no unmet waste management requirements from other areas?
  - d. Is there sufficient evidence to justify the location and extent of the Waste Management Areas of Search shown in Appendix 7 of the Plan?
- 

**MATTER 7G – ACHIEVING GOOD DESIGN**

**Policy DS1 – Achieving Good Design**

**Policy DS2 – Working with the Landscape**

**Policy DS3 – Urban Character**

**Policy DS4 – Streets and Movement**

**Policy DS5 – Safe and Inclusive Places**

**7.31 Policy DS1 – Achieving Good Design**

- a. Is the approach to achieving good design, including the specific measures set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?

**7.32 Policy DS2 – Working with the Landscape**

- a. Is the approach to working with the landscape, including taking advantage of existing features, integrating development into the wider landscape, and creating new quality spaces, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?

**7.33 Policy DS3 – Urban Character**

- a. Is the approach to urban character, including the specific criteria set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?

**7.34 Policy DS4 – Streets and Movement**

- a. Is the approach to streets and movement, including the specific criteria set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?

**7.35 Policy DS5 – Safe and Inclusive Places**

- a. Is the approach to safe and inclusive places, including the specific criteria set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Have viability issues been considered?
-

## **MATTER 8 – IMPLEMENTATION AND DELIVERY, including**

**Policy ID1 – Development Plan Documents and Annual Monitoring Report**

**Policy ID2 – Viability**

**Policy ID3 – Developer Contributions**

**Policy ID4 – Working with Partners**

**Policy ID5 – Facilitating Delivery**

### ***Key issue:***

***Are the arrangements for monitoring the policies of the Plan adequate, effective, comprehensive and soundly based?***

#### **8.1 Policy ID1 – Development Plan Documents and Annual Monitoring Report**

- a. Is the approach to using Development Plan Documents, Area Action Plans, Land Allocations DPD, Waste Management DPD, Neighbourhood Plans and Supplementary Planning Documents appropriate, effective, soundly based and consistent with the latest national guidance (NPPF/PG)? Is the policy needed?

#### **8.2 Policy ID2 – Viability**

- a. Is the approach to viability, including the requirements of developers to submit financial viability appraisals, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Is the policy unduly onerous, prescriptive and inflexible?

#### **8.3 Policy ID3 – Developer Contributions**

- a. Is the approach to developer contributions, including the requirements set out, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)? Is the policy unduly onerous, prescriptive and inflexible?

#### **8.4 Infrastructure Delivery**

**Policy ID4 – Working with Partners**

**Policy ID5 – Facilitating Delivery**

- a. Is the approach to Infrastructure Delivery, including Working with Partners and Facilitating Delivery, fully justified with evidence, effective, deliverable, positively prepared, soundly based and consistent with the latest national guidance (NPPF/PPG)?

#### **8.5 Monitoring and Implementation**

- a. Does the Monitoring & Implementation Framework provide a comprehensive, effective and sound basis for monitoring the implementation of the Plan, including the baseline information, indicators, targets, triggers and proposed actions?
- b. Are the delivery mechanisms, phasing and timescales for the implementation of the policies clearly identified, including critical elements of infrastructure required and further technical work needed on highways, drainage, utilities and other critical infrastructure improvements?
- c. Do the policies in the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, indicate when the plan will need to be reviewed, and identify the remedial actions to be taken if policies are not being successfully implemented?

---

## **MATTER 9 – OTHER POLICIES & OTHER MATTERS**

9.1 **Other Policies** – to be decided

9.2 **Other Matters** - Other matters not yet specified

SJP/TB v.3 26.01.15

---