

YGA's key concerns about the soundness of the draft Core Strategy

- Local distinctiveness is central to a sound Strategy, because it must respond to local evidence appropriately, and the draft does not adequately achieve this.
- The Core Strategy is especially weakened in its ability to deliver locally distinctive approaches, by the gulf between those policies that have clear, numerical targets and those that lack them. This is especially problematic when trying to evaluate the extent to which policies maximise their environmental benefits, since those benefits are difficult to quantify.
- The Core Strategy's aims to recycle previously developed land, achieve regeneration and sustainable development will be ineffective due to inadequate development densities, generic – rather than place-based - transport policies, and due to the negative impacts of the excessive housing requirement on development location.
- The need for a Green Belt review is not justified by the evidence, and the deferral of decisions about Green Belt changes to the Allocations DPD precludes a sufficiently strategic analysis of positive and negative and impacts of such changes.

Local Distinctiveness

The CS needs to be locally distinctive in its own right: this goes well beyond the need for context, a housing requirement and a settlement hierarchy, and means that the CS should address locally characterised problems with appropriate policy interventions that work in locally distinctive ways. Put simply, if there is no need for locally distinctive policies then the CS can simply defer to NPPF. Logically, therefore, a strategy that is not locally distinctive is not justified by local evidence.

National Planning Guidance defines 'distinctiveness' in terms of design and local character (para 26-015), stating that "*well designed new or changing places should:*

- *Be functional* [ie functionally relevant to its locality];
- *Support mixed uses and tenures;*
- *Include successful public spaces;*
- *Be adaptable and resilient;*
- *Have a distinctive character;*
- *Be attractive;*
- *Encourage ease of movement."*

From this starting point, we can generate a locally distinctive, spatial analysis of the problems that the Core Strategy needs to address, that is to say, which are the places that:

- have lost their function or have problems of inequality;
- suffer from an inappropriate or inadequate mix of uses and tenures;
- are poorly equipped in terms of public spaces, open spaces and public realm;
- are vulnerable in terms of climatic risks, inefficient building stock, dereliction, pollution;
- either lack a distinctive character or find their character threatened by homogenisation;
- find their attractiveness undermined, for example by insensitive developments, major infrastructure, pollution;
- are hampered by road traffic congestion, inadequate alternative choices of travel mode, excessive distances between homes and amenities.

A sound, locally distinctive Core Strategy would contain policies that specifically sought to tackle those problems on a place-by-place basis. This is not currently evident.

Furthermore, the Core Strategy also needs to evaluate the extent to which:

- previous development plans and planning decisions in the District have exacerbated or failed to prevent those problems, and therefore require remedial policies;
- the ways in which those problems inform a locally-derived balance between the sometimes competing requirements of NPPF.

In our view, the Core Strategy is especially weakened in its ability to deliver locally distinctive approaches, by the gulf between those policies that have clear, numerical targets and those that lack them. Whilst we accept that not all policies lend themselves to quantification, we do contend that every policy requires an expression of the scale of the task and the anticipated rate and direction of progress to implement it. Otherwise it is inevitable that the more quantified policies will take precedence, to the detriment of the whole and, therefore, to the soundness of the Strategy.

The policies which we suggest most need modifying to address this concern are as follows.

SC2: This needs to make clear that a key function of all *new* developments is to make *the places they are in* more sustainable and climate-responsive. Therefore each place requires a specific approach, and the policy should commit to that.

SC9: “Making Great Places” is a policy that can only be achieved with precise reference to existing places and their particular needs, ambitions and shortcomings.

EC4: This should be place-specific: most clauses of the policy have an implied spatial element, and local distinctiveness should be intrinsic to a successful, sustainable economy.

TR1: Travel reduction and modal shift can only be realistically achieved by planning to influence the specific travel choices engendered by the characteristics of the place and its existing patterns of movement. For example, a locally distinctive approach would begin by asking, “What are the

particular routes or journey types in this locality that could offer most potential for modal shift, and how can the CS facilitate that?"

HO2: In line with our comments on Green Belts (below) we need to see that 'strategic sources of supply' are justified on the basis of sustainable outcomes that are relevant to their localities, not just on the basis that "other sources of supply have proved insufficient". HO3 may then need modifying accordingly.

Maximising Environmental Benefit (Examination question 4.4c)

The evidence base for 'maximising environmental benefit' is entirely unclear. Our question is: how do we get this to carry weight compared to numerical targets such as the housing requirement? In particular, can this objective be used as an effective basis for enhancing locations whose environment has already been degraded?

There are a wide range of policies and text references in the draft CS that suggest the existence of substantial evidence, both of environmental problems and opportunities. However, these lack a coherence of approach or any way to measure them against other outcomes that are more easily quantified. The table on the 2 next pages highlights some important examples of this problem.

<u>Core Strategy reference</u>	<u>Evidence/gaps for maximising environmental benefit</u>
SC1B(1): "Transform economic, environmental and social conditions in the District, in particular...Bradford City Centre, Canal Road Corridor and Leeds Bradford Corridor as well as Airedle and Shipley."	What are those specific conditions?
SC1B(8): "Ensure resilience and become adaptable to environmental threats..."	What are the threats in particular places?
SC1B(7), (9), (10) and (11).	What might be monitorable outcomes for these?
3.26 "Continued unbalanced development will threaten the future quality of life and competitiveness of the District – with 'overheating' of already successful areas (through congestion and reduced environmental quality) and a 'failure to capitalise' on the latent strengths of under-performing areas."	Suggests a spatially-distinguished strategy in which environmental, transport and economic policies are integrated on a place-by-place basis, with a locally-relevant combination of constraints and enhancements for each place.
SC2 and SC3	Limited by lack of outcomes/indicators despite a reasonably comprehensive policy approach.
3.41 "Without intervention the need to accommodate growth and development could lead to air quality being worse in the future."	What are these interventions? This is not clear.
SC4C: "Biodiversity, landscape and heritage assets define the character and setting of the District's principal towns."	We agree: what is missing is "...and so these assets will directly inform planning decisions." This would establish a much more restorative approach to both environment and place, instead of the reductive aim of avoiding 'demonstrable harm'.
SC4 indicators	The success of the settlement hierarchy in directing the emphasis of development is not being measured in environmental terms.
3.64-3.67: urban renewal; public realm and open space and "compact places, designed to increase the use of public transport, walking and cycling."	This highlights the need for a comprehensive approach to development densities as detailed in our responses to the submission draft.

<p>SC6 (GI) and particular attention to Fig SS3(7):                  “For identified urban extensions, local green belt releases and proposals to develop greenfield sites – incorporate the character of the surrounding landscape, achieve sustainable design and networks of green spaces.”</p>	<p>This highlights the role of Green Belts in protecting local environmental assets, and that role should be central to any review of Green Belt, as well as to development management within, or impacting on, the Green Belt.</p>
<p>SC7</p>	<p>The policy needs a clearer sense of the environmental outcomes of the existing Green Belt and of the Green Belt review. It is not clear why ‘net change in area of Green Belt’ is a meaningful indicator, since this implies that some given rate of change is desirable, which is at odds with its intended permanence.</p>
<p>All Environmental Policies</p>	<p>The suite of environmental policies covers all relevant aspects in terms of criteria and principles, but is severely lacking in monitorable outcomes that give a sense of the scale or direction of the challenge or enable weight to be given to the policies in comparison to headline numerical targets, in particular the housing numbers and distribution. Consequently, restoring degraded environments is unlikely to be effective.</p>

Green Belts

In our ‘Further statement 2: all matters relating to housing’ we set out our clear position that a sound approach to housing requirements would reduce land supply requirements to the degree that sites identified in the SHLAA but subject to policy constraints, including Green Belt and safeguarded land, would be very unlikely to be needed. This is the starting point for our case that the draft CS’s approach to reviewing the Green Belt is unsound.

Yorkshire Greenspace Alliance is represented in the Examination by CPRE. CPRE considers that Green Belts are a strong policy tool for defining the shape and extent of settlements and the relationship between settlements and the countryside. As such, there are often under-used opportunities to harness Green Belt as a resource for recreation, food production and biodiversity in the urban fringe, and to provide relief within and between built-up areas. CPRE also sometimes supports planning applications for exemplary developments in the Green Belt, for example well-designed, zero-carbon buildings.

However, we do not accept the assumption that Green Belts should be unpeeled to make room for large-scale new development, because it establishes the precedent that Green Belt can be treated

as a long-term area of search for building land: ultimately this applies development pressure on Green Belt sites and creates an incentive for speculative planning applications. Even if some development were to be considered in the Green Belt, speculation is entirely the wrong result, because the local sensitivity to Green Belt changes demands a much more community-led approach.

Therefore our view of Green Belt reviews is that their purpose should be to consider whether changes to the boundaries and functions of Green Belts could create a more sustainable pattern of settlements and adjacent countryside than exists at present; and the form of function of possible built developments that might facilitate that. Consequently any methodology for a review must start with an analysis of how sustainability objectives are helped or hindered by particular parcels of Green Belt land.

At present, it is entirely unclear what the rationale, process and methodology for the Bradford Green Belt review is, and the whole decision-making system for this appears to be deferred to the Allocations DPD. Notwithstanding our view that the housing requirement does not justify a Green Belt review, the draft CS's current position on housing land supply hinges quite significantly on a scale of Green belt deletions that appears to be untested. This is the case, for example, at Holme Wood, where a broad location for Green Belt incursion is identified whilst the specifics are left to the Allocations DPD. In our view this is unacceptable because, whilst we maintain our view that Green Belt loss is not necessary, the devil is very much in the detail as to what the precise impacts on the landscape and the community, and the function of the Green Belt, might be from an incursion at Holme Wood. Without being able to examine that detail, it is impossible to make a reasoned judgement about the scale and type of development that might be accepted by the community in that area, and how it might contribute to sustainable development.

The Inspector's questions highlight potential Green Belt impacts in the following localities: Holme Wood, North-East Bradford, Keighley, Bingley, Baildon, Cottingley/East Morton, Ilkley, Burley and South-Pennine towns and villages. The draft CS also notes 'significant contribution from green belt changes' in South-West Bradford, and Steeton & Eastburn. What appears untested is the extent to which different housing level and distribution scenarios place more or less pressure on these different Green Belt areas. At present the CS appears to say: 'this is our housing requirement, and here are some Green Belt sites that could contribute to a land supply to meet that requirement', which is entirely the wrong rationale. A sound rationale would be: 'Here are some sites currently in Green Belt, but taking them out of Green Belt would enable a more sustainable pattern of development' and this would be supported by suitable justifying evidence. A quantitative land supply contribution would therefore be an output of the review, but the principal outcome would be more sustainable settlements.

We also note that Policy EC3 "makes provision for selective green belt deletions using the exceptional circumstances allowed under paragraph 83 of NPPF" The justification for this appears to be in the event of an inward investment need for a big, accessible site. Extreme caution is needed in such cases, because large-scale developments are plainly at odds with the purposes of Green Belt and, as with housing, the soundness of this approach is very dependent on site-specifics that the CS defers to the Allocations DPD.

Previously developed land, regeneration and sustainability

The draft CS does not currently make clear that:

- Recycling brownfield sites is a planning objective in its own right, for which new development is a crucial delivery mechanism;
- New development should contribute to the overall sustainability of existing settlements and patterns of movement, rather than merely avoid undue negative impacts on them.

We have grave concerns about the relationship between development density and travel choice. As mentioned in our submissions to the Consultation Draft CS, there is plenty of evidence that net residential densities below 60 dpha cannot support economically viable public transport services; nor can they sustain a good range of local amenities within easy walking distances.

Policies HO5 and TR3 must be considered together: outcomes must include high minimum densities for new developments in accessible, walkable neighbourhoods. In particular, the minimum density in HO5 of 30dpha is unsound, because developments at such low densities are inherently unsustainable even when located in accessible places.

Transport

Are the aims for travel reduction, modal shift and improving travel by sustainable modes supported by the proposed scale and distribution of development?

Transport Assessments in support of planning applications are, all too often, focused primarily on the peak-time traffic congestion impacts *on the functionality of the road network*, with very little consideration given to the day-in, day-out impacts *on communities* that the traffic passes through.

CS para 5.2.17: Whilst the importance of modal choice in very short journeys cannot be overstated, there are a number of influencing factors that the CS does not adequately consider, including:

- topography and weather (which have a strong influence on walking and cycling choices);
- Compound journeys, (eg home-school-work-school-shops-family-home, in which one car-dependent component results in the whole journey being made by car);
- Traffic flow management (which often creates a succession of barriers to safe, convenient walking and cycling, for example when crossing a major road);
- Pinchpoints where bus and cycle lanes are interrupted by car lanes (creating merging-in congestion and poor flow for buses and cyclists).

In this context we see no evidence that Policy TR1 or TR3 would be effective.

TR5 is also too generic and too dependent on a disparate set of delivery mechanisms outside the scope of the CS; again, with reference to our comments on residential densities, higher density communities would enable more economically viable transport solutions requiring less local authority intervention to make them effective.