

MATTER 7A: Strategic Core Policies

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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?-

Our comments stated in our submissions to the Publication Draft remain valid in relation to these strategic core policies.

7.1 - STRATEGIC CORE POLICY 2 (SC2) CLIMATE CHANGE AND RESOURCE USE.

We support the general content of policy SC2. It is important however in the context of the contents and aspirations of this policy to recognise that very often it is via development and investment associated with that development that adaptations to climate change can be assisted. For example the management and expansion of vulnerable habitat types can be achieved via a judicious balance of development and the associated transfer of open land within the control of developers from agricultural management regimes or underuse into well

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managed habitat. The benefits of this approach have not been adequately recognised in subsequent policies, in particular those which relate to the South Pennine Moors habitat and the attempts to limit the amount of residential development in Wharfedale and certain Airedale settlements.

The emphasis on focussing development and activity in the principal towns is not adequately supported in other policies particularly in relation to the town of Ilkley.

In answering question 7.1 b in relation to the recent national consultation regarding the incorporation of energy efficiency rules from the Code for Sustainable Homes into Building Regulations, Policy SC2 is strategic enough in content to align with potential future changes at national level. There is no reference in Policy SC2 to specific standards or codes therefore, as written we consider it is flexible and able to adapt to changing national policy.

7.2 - STRATEGIC CORE POLICY 3 (SC3) WORKING TOGETHER

Collaboration between the constituent councils of the LCR has improved considerably in recent months via the LEP and the Leaders Board and should further improve as a result of the new combined West Yorkshire Authority which is to deal with strategic transport and economic development and is likely to have some form of strategic planning role. Again however some of the aspirational content of this policy is not supported by the actual content of subsequent CS policies. In particular achieving a balance between housing provision and job growth is not adequately supported by policies dealing with the housing requirement and supply. Achieving this highly desirable strategic balance is a key aspect of sustainable development planning and in order to fully support this more emphasis and provision for housing growth is essential.

NPPF paragraphs 178 – 181 set parameters for planning strategically across local boundaries which we consider Bradford Council comply with. The establishment of the West Yorkshire Combined Authority (WYCA) in March 2013 is evidence of the Council successfully working together with neighbouring authorities. The WYCA have current responsibilities for strategic transport delivery and funding and Bradford have a number of key transport schemes included within the West Yorkshire Plus Transport Fund.

Bradford is embedded within the Leeds City Region and the Local Enterprise Partnership in their Strategic Economic Plan support Bradford as a growth centre. There is clearly cross boundary working in Bradford.

7.3 - STRATEGIC CORE POLICY 6 (SC6) GREEN INFRASTRUCTURE

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The policy content of SC6 and the explanatory text are fully supported and the District –wide opportunities for enhancing the amount, quality and connectivity of green infrastructure via development proposals are fully recognised. This approach will be realised via positive and proactive planning. It should however be recognised that the delivery of green infrastructure and other social, environmental and economic improvements via individual developments to realise their full sustainability potential needs comprehensive growth orientated planning.

The definition of Green Infrastructure in Policy SC6 part C aligns with the definition in the Framework which is as follows:

“Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.”

The Framework at paragraph 114 states that “Local Planning Authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.” Policy SC6 meets the Frameworks approach. We understand that the Council propose the preparation of a Green Infrastructure SPD in their LDS.

7.4 - STRATEGIC CORE POLICY (SC 9) MAKING GREAT PLACES

We support the content of this policy and the concentration of development on the City of Bradford and the three principal towns of Ilkley, Keighley and Bingley as well as the creation of sustainable rural communities. Our location and site specific assessments lead us to the conclusion that the levels of growth we are promoting can be accommodated in a way which results in high quality places and attractive and sustainable settlements.

With reference to being ‘place specific’ we consider that Neighbourhood Plans will play a key role in delivering plans and development that creates a strong sense of place.