

Core Strategy Partial Review

Preferred Options



Statement of Consultation

July 2019

FOREWORD

Bradford Council adopted its Core Strategy Development Plan Document (DPD) in 2017. Since its adoption there have been a number of recent changes to national planning policy which has prompted the Council to undertake a partial review of the key planning document.

The Core Strategy Partial Review formed the first stage of public consultation during review process of the adopted Core Strategy DPD. The consultation sought views on the scope and direction of the plan from members of the public, interested parties and stakeholders.

This Statement of Consultation report provides details of the public consultation that was carried out and the responses gained as a result.

Further Information

For more information about the Core Strategy DPD: Partial Review or the Local Plan for the Bradford District, please contact the Local Plan Team at:-

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1. Introduction & Background

- 1.1 Town and Country Planning regulations require Local Planning Authorities to involve the public and key stakeholders in key stages of the Development Plan process. When preparing documents which relate the Local Plan, the Council must carry out public consultation and engage with local communities and stakeholders.
- 1.2 Authorities are also required to prepare and publish a Statement of Community Involvement (SCI) which explains when and how any public consultations will take place, whom will be consulted and what will be done to engage the community at each stage of the consultation process and also within planning applications. The Council is fully committed to community engagement in the delivery of local services and functions. The Revised Statement of Community Involvement was adopted by the Council on 6th November 2018.

Background

- 1.3 The Core Strategy is the key strategic planning document of the Bradford Local Plan which shows broad areas for growth and restraint and the long term spatial vision of the District up to 2030. It also sets out the role of each settlement in the District and defines development targets for growth. The Core Strategy DPD was adopted on 18th July 2017.
- 1.4 Following recent and significant updates to national planning policy, particularly in relation to assessing housing need and setting consequent housing requirements, the continued protection and enhancement of green belt and local policy changes including the adoption of a new economic strategy for the district a focus upon major transport projects, including the Northern Powerhouse Rail, the Council deemed it necessary to undertake a partial review of the adopted Plan.
- 1.5 As the Core Strategy is such an important planning document it is vital that the Council reviews it and makes sure it is relevant and up to date for the future planning of the Bradford District.

Purpose of this document

- 1.6 This Statement of Consultation sets out how Bradford Council has involved the community and key stakeholders at the scoping stage of the Core Strategy Partial Review. This report sets out what work was carried out to consult the different individuals, organisations, agencies and residents of the District, how this met the requirements of the regulations and how it complies with the Council's adopted revised SCI. It also sets describes how the results of the consultation have been taken into account during the preparation of the next stage of the plan.

- 1.7 This report will outline how this consultation stage complies with the relevant regulations as set out within the Town and Country Planning (Local Development) (England) Regulations 2012, in pursuant to Regulation 18:
- **Regulation 18** – Preparation of a Local Plan
 - **Regulation 22** – Submission of documents and information to the Secretary of State
- 1.8 Regulation 18 requires the Local Authority to notify bodies or persons of the subject of the Local Plan and invite each of them to make representations. This report provides a formal record of the public consultation which has taken place at Regulation 18 and provides evidence in preparation for the Regulation 22 submission statement.
- 1.9 Section 2 sets out the methods of consultation, including which bodies and persons were invited to make representations and how these were invited.
- 1.10 Section 3 provides a summary of the main issues raised by the representations; and how those issues have been taken into account.

2. The Core Strategy Partial Review - Scoping Report Consultation

Introduction

- 2.1 The Core Strategy DPD is an important document which forms part of the Local Plan for the Bradford District. It sets out a vision, objectives and a range of planning policies which aim to deal with the challenges involved in providing for the needs of a rapidly growing population in the best and most sustainable way. The Core Strategy was adopted by the Council in July 2017.
- 2.2 Since its adoption there have been a number of significant changes to national planning policy as well as local policy changes which have the potential to alter the future planning strategy for the Bradford District. In order to ensure that the Core Strategy is fit for purpose, it had become necessary to undertake a review of the policies which were potentially affected by recent policy changes.
- 2.3 This Core Strategy Partial Review establishes the key policies to be reviewed and the updates required to the evidence base as a result of the recent changes in planning policy along with any further critical issues to be addressed.

Purpose of the Consultation

- 2.4 The Core Strategy Partial Review forms the start of the work to update the adopted plan. The scoping stage consultation allows interested parties to participate in understanding the process and contributing comments, ideas and issues to the Council. This consultation fulfils the requirements of Regulation 18 of the Town and Country Planning (Local Development) Regulations 2012 (as amended).
- 2.5 The main policy areas highlighted for review, in summary, were:
- the Core Strategy plan period
 - strategic housing –
 - Policies HO1, HO3, HO4, HO6, HO8, HO9, HO11 and HO12
 - economic growth –
 - Policies EC1, EC2, EC3, EC5
 - Green Belt (Policy SC7)
 - viability of the Plan (Policy ID2).
- 2.6 In addition, the consultation considered if there were any new issues which would require a strategic policy response that could form part of the Partial Review. The possible new policy area for considered identified were:
- Specialist housing
 - Self and custom build

- Combined infrastructure priorities
- Green infrastructure
- Healthy places

Consultation and Supporting Documents

- 2.7 In line with the requirements of the planning regulations and best practice, the Council undertook a 6 week consultation from **Friday 11th January 2019 to Friday 22nd February 2019**.
- 2.8 The following documents were produced and made available during the consultation:
- Core Strategy Partial Review Scoping Report
 - Sustainability Appraisal (including Strategic Environmental Assessment (SEA)) - Scoping Report
 - Habitats Regulations Assessment (HRA) – Scoping Report
 - Equalities Impact Assessment (EqIA) – Scoping Report
 - Health Impact Assessment (HIA) – Scoping Report
- 2.9 Printed copies of the consultation documents were placed for inspection at the deposit locations listed below. Notifications of these locations were given in the consultation letter/E-mail, in the Local Plan newsletter and website along with advertisements in the local press.
- Council's Contact Centre at Britannia House, Hall Ings, Bradford
 - Council one stop shop at Keighley Town Hall
 - The main local libraries in Bradford City Centre, Bingley, Keighley, Shipley, Ilkley and Bradford Local Studies.

Who was consulted?

- 2.10 A total of 99 emails were sent out to the statutory consultees. These included Town and Parish Councils and neighbouring local planning authorities.
- 2.11 A total of 3,914 e-bulletins were sent out via the GovDelivery system on Monday 11th January. A further bulletin was sent out on 15th January with website link updates. 99.6% of these were delivered and there was a 29% open rate.
- 2.12 In addition, all 90 Councillors and the 5 Members of Parliament (MPs) covering the District were also notified of the consultation via an E-mail correspondence.

How the public and other stakeholders were consulted

- 2.13 The Council used a number of different methods of community consultation and engagement which aimed to reach the different groups within the community. The ranges of methods used are outlined below:

- 2.14 The Council uses a GovDelivery system to distribute news and **e-bulletins** to the general public. Any persons can sign up and register to receive email bulletins on specific areas of the Council which is of interest to them. There is an option to sign up to receive ‘Planning Policy’ updates. A sample e-bulletin can be found in Appendix 1A.
- 2.15 **A press release** was issued to media company Newsquest Group who produce the newspapers covering the Bradford District in advance of the consultation. The following papers published details of the consultation and examples of the published articles can be found in Appendix 1B.
- Telegraph and Argus – 19th January 2019
 - Keighley News – 21st and 29th January 2019
- 2.16 The Council’s **Local Plan website** (www.bradford.gov.uk/planningpolicy), in particular the Core Strategy DPD webpage was used to facilitate communication of the consultation and the time period.
- 2.17 A Regulation 18 statement was advertised on the Council’s website which set out details of the consultation. A copy of this can be found in Appendix C.
- 2.18 Issue 28 of the **Plan-It Bradford newsletter (December 2018)** was circulated to over 3,000 persons registered on the GovDelivery system announcing the imminent start of the consultation. An extract article of the consultation can be found in Appendix 1D.

Drop-in Events

- 2.19 Several **Drop-in events** were organised within the Bradford District. These events were aimed at residents, community groups, Parish and Towns Councils, agents, developers and other interested parties who had either been involved in or had requested involvement in the Local Plan process.
- 2.20 The events provided an opportunity for attendees to ask questions to assist in being able to respond to the consultation.
- 2.21 A list of events can be found in Table 2.1 below.

Table 2.1: Details of drop-in events

Date	Time	Venue	No. of attendees
Monday 21 st January 2019	15.30 – 19.30	Victoria Hall, Saltaire	3
Thursday 24 th January 2019	15.30 – 19.30	Central Hall, Keighley	9
Tuesday 29 th January 2019	15.30 – 19.30	Clarke Foley Centre, Ilkley	17
Thursday 31 st January 2019	13.00 – 17.00	City Hall, Bradford	1

3. Summary of the Consultation Outcomes

- 3.1 A total of 164 individuals submitted 1626 comments relating to various sections of the Core Strategy and its supporting documents. This included agents submitting comments for one or more clients. The largest group of respondents were local residents.

Table 3.1: Type of contributor to the consultation

Type of Contributor	No of comments received
Local Residents	115
Local Councillor	10
Local Business owners	9
Planning Consultant / Agent	32
Developers	9
Landowners	5
Other	15
TOTAL	195
<i>*Some people selected more than one category</i>	

- 3.2 The Council received comments via a number of methods, including through an online survey questionnaire, E-mail and postal submissions. The largest number of submissions was via the online survey questionnaire with 112 submissions. The table below identifies how many responses received by each method.

Table 3.2: Method of representation submission

Submission Method	No. received
Online survey questionnaire	112
Email	46
Letter	4
Drop-in events	30

Distribution of Comments Received

3.3 Of the 1626 comments which were submitted, the majority of these were against the Core Strategy Partial Review Scoping Report. There were relatively few comments received in relation to its supporting documents.

Table 3.3: Distribution of the comments received for the consultation and supporting documents.

Consultation Document	No. of comments received
CSPR Scoping Report	1549
Sustainability Appraisal	20
Habitats Regulations Assessment	21
Equalities Impact Assessment	14
Health Impact Assessment	22

3.4 The Council received many well informed comments during the consultation across all policy areas. The questions relating to the plan period and housing policies received the majority of comments overall.

Table 3.4: Distribution of comments received for each consultation question.

Consultation Question	No. of comments received
General Comments	82
The Plan period (<i>Do you agree</i>)	123
The Plan Period	84
HO1: The District's Housing Requirement	112
HO3: Distribution of Housing Development	127
HO4: Phasing the release of housing sites	86
HO6: Maximising the use of Previously Developed Land	106
HO8: Housing Mix	97
HO9: Housing Quality	92
HO11: Affordable Housing	91
HO12: Sites for Travellers and Travelling Showpeople	53

EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region	62
EC2: Supporting Business and job Creation	58
EC3: Employment Land Requirement	41
EC5: City, Town, District and local Centres	55
SC7: Green Belt	123
ID2: Viability	71
Any other Core Strategy Policies to be reviewed in full?	36
Appendix 1	29
Evidence Base	21

Summary of the Comments Received to the Core Strategy Partial Review – Scoping Report

Core Strategy Partial Review: Scoping Report

- 3.1 The Core Strategy Partial Review Scoping Report received a vast amount of valuable comments, some of which were not entirely relevant or appropriate to this consultation.
- 3.2 Comments which related to sites or site promotions have not been included within this consultation report as it was not the intention of this consultation to receive these. However, these have been noted and kept on file to be transferred to the more appropriate Allocations work area.
- 3.3 A wide range of issues were raised in relation to the Scoping Report, these are summarised below:-
- Support for the proposed plan period of 2020-35.
 - Plan flexibility – need to ensure that plans are not too long and have flexibility in the short term to support implementation and respond to changes in local circumstances and uncertainties nationally about economic and population changes.
 - Potential plan delays – extending the plan period may lead to delays in implementation with the pressing need to tackle issues now, including climate change.
 - Infrastructure planning – need for the plan to include additional information and a clear focus upon the timely delivery of infrastructure, including healthcare, transport, parking, education, green spaces and recreational areas.
 - Overall plan period – the start date of the plan needs to be clarified and how unmet need is carried forward. There may be a need to extend the plan period further to 2036/37, noting the minimum 15 years advised by national policy.

- There may be a need to extend the plan period to at least 2037 as a minimum in consideration that plan-making may take longer than first envisaged.
- Benefits of long-range plans – longer term plans can be more strategic and have a wider reach in terms of issues and considerations.

Summary of the Comments Received to the Supporting Documents

Sustainability Appraisal Scoping Report

3.4 Below is a summary of the key issues raised in relation to this supporting document:

- The concept of sustainability was queried, along with the SA process.
- Key elements covering the built environment should be added to the sustainability issues list and SA framework.
- It was suggested that additional documents and strategies related to the natural environment should be included on the PPP list and that the SA Framework indicators be amended to reflect the need to consider protected species and ancient woodland.
- Greater consideration should be given to air quality, air quality management, the provision of electric vehicle charging points, sustainable transport, the provision of green spaces/open spaces and waste management/recycling.
- The need to ensure housing and population growth is commensurate with infrastructure.
- Landscape character should be afforded more protection.

Habitats Regulations Assessment

3.5 Below is a summary of the key issues raised in relation to this supporting document:

- The HRA will need to be reviewed if legislation changes due to BREXIT.
- The HRA is important but should not be a priority over housing.
- There needs to be a clear policy which sets out the significance of the HRA zones.
- The zones of influence need to be shown on a map.
- Details of the avoidance and mitigation measures need to be provided.
- There needs to be more protection of the areas where protected bird species feed as well as where they breed.
- The HRA needs to consider the impact that large events have on the protected area.
- A Habitats Management Plan should be prepared.

Equality Impact Assessment

- 3.6 Below is a summary of the key issues raised in relation to this supporting document:
- The need for equality issues to be linked to decision making in planning applications
 - Equality issues linked to access to open spaces and affordable housing
 - Concerns regarding the review of impacts upon communities.

Health Impact Assessment

- 3.7 Below is a summary of the key issues raised in relation to this supporting document:
- Recognition of the health benefits relating to access to open spaces, recreation and outdoor recreational activities
 - Concerns raised regarding air quality and the impacts on health
 - Impact of new transport schemes on people's health
 - Availability of health infrastructure
 - Concerns raised regarding the health impacts of the proposed Marley incinerator
 - The need for additional training and education within health sectors

How the issues raised have been dealt with

- 3.8 The comments received help to demonstrate to policy officers if the proposed policy approach and scope are appropriate for the Bradford District and in the determination of planning applications.
- 3.9 Planning Policy officers have read, analysed and responded, where appropriate, to the representations which were received during the scoping stage consultation. The consensus of the comments along with further evidence base studies provide a basis to help inform the next stage of the preparation of the Core Strategy Partial Review – the preferred options.
- 3.10 The comments and issues raised have been summarised in order to make this report manageable, a summary of these, including the Councils response, is contained within the Appendices.

4. Next Steps

- 4.1 Following consideration of the comments received and further work collecting up-to-date evidence to support policy development, the Council will prepare a Preferred Options report.
- 4.2 The Preferred Options report will outline the Council's preferred approach to the review of the policies outlined in the scoping report along with the reasonable alternatives which have been considered and are proposed to be discounted as a viable policy to be included within the plan.
- 4.3 Consultation on the Core Strategy Partial Review Preferred Options will take place in July 2019.

Appendix 1A: GovDelivery e-bulletin

Bradford Local Plan - Have your say

[View this email in your browser](#)



Stay Connected 



Bradford Local Plan - Have your say

Help shape future Planning Policies.

Apologies if you read our email last Friday about the Bradford Core Strategy Partial Review and had problems finding our online consultation. We have updated the links in this email to help you get straight to the consultation page.

Bradford Council is starting work on the partial review of its adopted Core Strategy. The Core Strategy forms an essential part of the Local Plan for Bradford setting out our strategic housing, employment, transport, retail, leisure and environmental policy requirements and also importantly the policy context for the broad location, scale and distribution of site allocations for mainly housing and employment. We also use the Core Strategy policies to help determine planning applications and inform key infrastructure and investment priorities.

The review has been stimulated following recent updates to national planning policy, particularly in relation to calculating housing requirements, the continued protection and enhancement of green belt and local policy changes

including the adoption of a new economic strategy for the district and a focus upon major transport projects, including Northern Powerhouse Rail.

The first stage of consultation involves establishing the range of existing adopted core strategy policies which may require reviewing. The Council welcomes feedback on our initial directions. This consultation is an early opportunity to help shape Bradford's planning policies for the future.

Please visit our website to [find out more about the proposed changes and how to make comments](#).

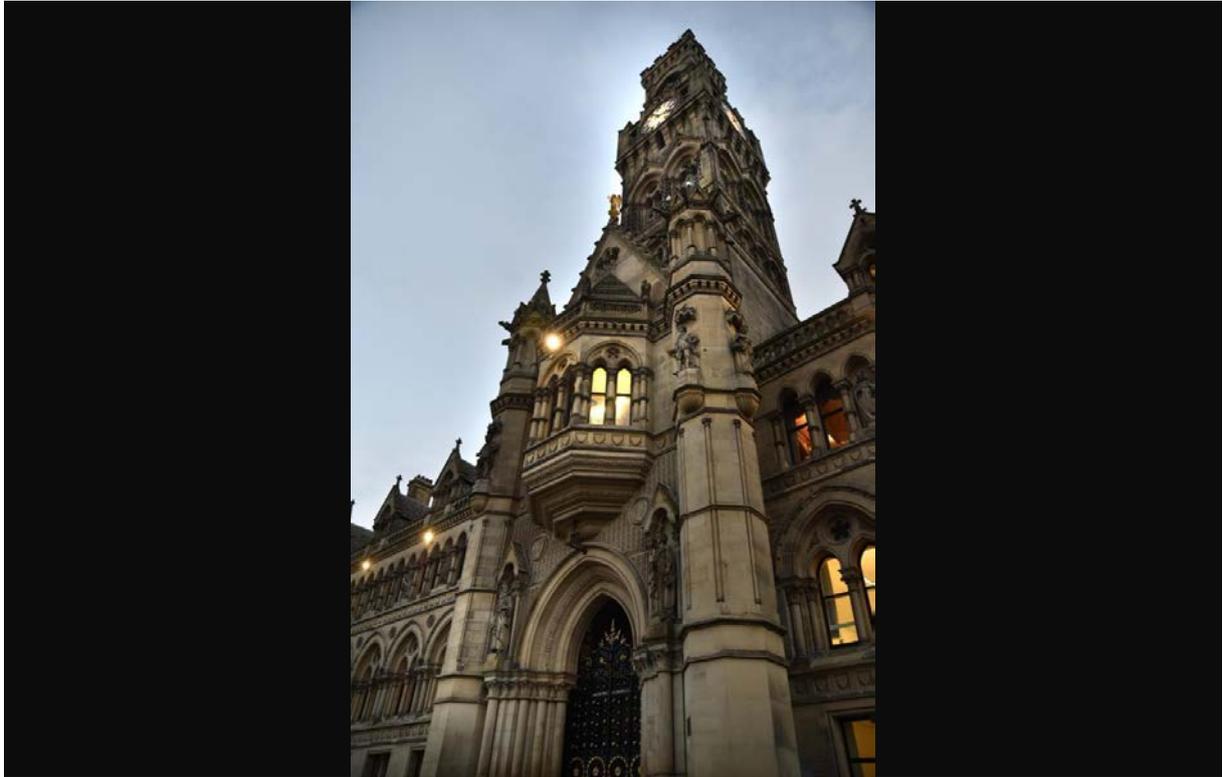
[Find out more](#)

Appendix 1b – Media Releases

Telegraph & Argus Article 19th January 2019

Have you says on Bradford Council's strategy

By [Tim Quanttrill](#) Chief Reporter



City Hall

[22 comments](#)

BRADFORD Council has launched its consultation on a ‘Partial Review’ of its adopted Core Strategy.

The Core Strategy forms an essential part of the Local Plan for the whole of the Bradford district setting out the council’s strategic housing, employment, transport, retail, leisure and environmental policy requirements.

It also sets out the policy framework for the broad location, scale and distribution of sites for mainly housing and employment developments.

Core Strategy policies are also used to help determine planning applications and inform key infrastructure and investment priorities.

Recent updates to national planning policy, particularly in relation to calculating housing requirements, the reinforced protection of the green-belt and local policy changes, including the adoption of a new economic strategy for the district and a focus upon major transport projects, including Northern Powerhouse Rail, make now the best time to carry out this review.

This first stage of consultation on the Core Strategy is called a Partial Review, which involves establishing the range of existing adopted core strategy policies which may require reviewing. This consultation is an early opportunity for local people to help shape Bradford's planning policies for the future.

The online consultation runs until Friday, February 22, at 5pm and a number of public drop-in sessions have also been arranged to provide further information about the review. Public drop-in sessions will be held at Victoria Hall, [Saltaire](#), on Monday, January 21, from 3.30-7.30pm, Central Hall, [Keighley](#), on Thursday, January 24, from 3.30-7.30pm, Clarke Foley Centre, [Ilkley](#), on Tuesday, January 29, from 3.30-7.30pm and Bradford City Hall on Thursday, January 31, from 1pm to 5pm.

Steve Hartley, Director of Place at Bradford Council, said: "This is the first stage of our partial review of the Core Strategy and we're keen to get feedback on whether we've chosen the right areas to take a fresh look at in light of the proposed changes to government planning policy.

"This is just the first stage of the partial review and there will be further opportunities as we progress but we've got strong aspirations for our district to grow its economy and provide high quality homes for people so it's important we get this right."

Complete the survey online at www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/.

Hard copies are available for inspection at, Britannia House, Keighley Town Hall, Bradford Local Studies Library and at the following libraries: Bradford City, [Bingley](#), Ilkley, Keighley and [Shipley](#).

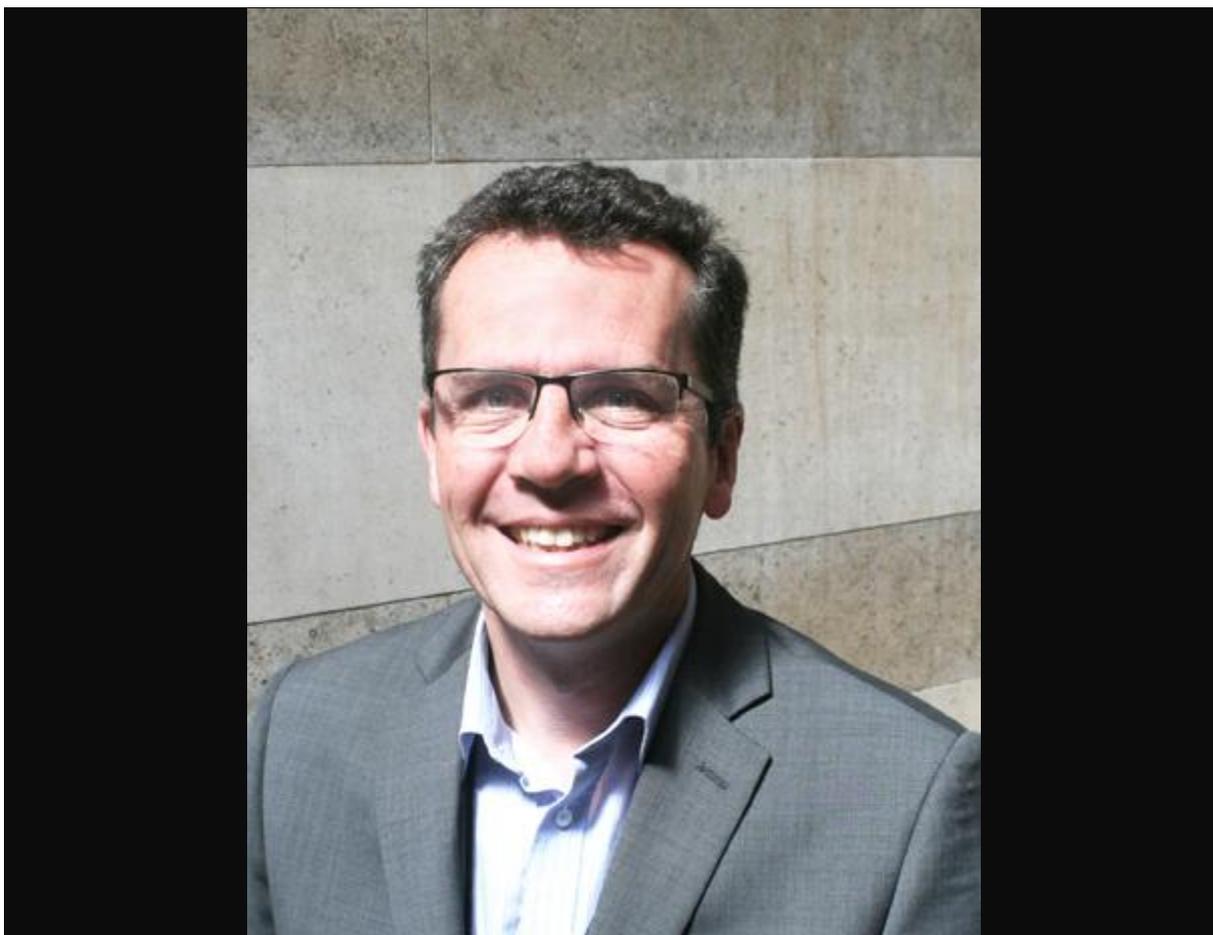
Keighley News Article 21st January 2019

- [News](#)

21st January

Public views sought as core strategy is reviewed

By [Alistair Shand](#)



Steve Hartley

A DROP-in session takes place in Keighley on Thursday (Jan 24) as part of public consultation into Bradford Council's partial review of its adopted core strategy.

The strategy forms part of the district Local Plan, which sets out the council's strategic housing, employment, transport, retail, leisure and environmental policy requirements.

It also outlines the framework for the broad location, scale and distribution of sites, predominantly for housing and employment developments.

The drop-in is being held at Central Hall, Alice Street, between 3.30pm and 7.30pm.

Steve Hartley, director of place at Bradford Council, said: “This is the first stage of our partial review of the core strategy and we’re keen to get feedback on whether we’ve chosen the right areas to take a fresh look at in light of the proposed changes to Government planning policy.

“With this just being the first stage there will be further opportunities to comment as we progress but we’ve got strong aspirations for our district to grow its economy and provide high-quality homes for people, so it’s important we get this right.”

Keighley News Article 21st January 2019

https://www.keighleynews.co.uk/news/17300262.long-term-plan-for-district-is-subject-of-public-consultati

Drop-in consultation at Central Hall to help shape future policies for Keighley and Bradford

News

28th January

Long-term plan for district is subject of public consultation

By Miran Rahman



Keighley's Central Hall, the venue for part of the public consultation on a review of Bradford's Core Strategy

[f](#) [t](#) [in](#) [e](#) 0 comment

A KEIGHLEY venue hosted a drop-in consultation to help local people influence a long-term plan for Bradford district.

People were invited to Central Hall, in Alice Street, last Thursday to have their say on Bradford Council's "Partial Review" of its adopted Core Strategy.

The strategy is part of the Local Plan for the whole of Bradford district, setting out the council's strategic housing, employment, transport, retail, leisure and environmental policy requirements.

It outlines the policy framework for the broad location, scale and distribution of sites to be used for either housing or employment developments.

▶ × The Core Strategy policies is also used to help decide planning applications and inform

developments.



UK: Government Is Paying Homeowners To Go Solar If Their Postcode Qualifies
dailybuzzstuff.com

▶ × The Core Strategy policies is also used to help decide planning applications and inform infrastructure and investment priorities. The council has explained that now is a good time for a review of its strategy due to recent updates to national planning policy, the reinforced protection of the green belt and a focus on major transport projects such as Northern Powerhouse Rail.

A council spokesman said: "As the Core Strategy is such an important document it's vital the council reviews it and makes sure it is relevant and up-to-date for our local area."

The online consultation runs until Friday, February 22, at 5pm.

People can complete the survey online at bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/

Hard copies are available at Keighley Town Hall and Keighley Library

Appendix 1d

**City of Bradford Metropolitan District Council
Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012**

Public Consultation Notice – Regulation 18

NOTICE IS HEREBY GIVEN that the Bradford Core Strategy Partial Review Scoping Report Regulation 18 consultation period commences for six weeks from Friday 11th January 2019 to Friday 22nd February 2019.

You are invited to comment on the Bradford Core Strategy Partial Review Scoping Report and supporting documents.

The Bradford Core Strategy Partial Review, supporting documents and response form are available at the Council's website:

www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/

The Council is encouraging representations to be submitted where possible through an on-line comments form, which is available on the Council's website.

The Bradford Core Strategy Partial Review Scoping Report and supporting documents are also available to view at the local libraries listed below during normal opening hours:

- Bradford City Library
- Bradford Local Studies Library
- Keighley Library
- Shipley Library
- Bingley Library
- Ilkley Library

Alternatively, paper copies of the documents and response form are available to view and complete at the following location during normal working hours:

- Britannia House, Bradford
- Keighley Town Hall

Please complete the on-line snap survey, on-line comments form or send your representations and completed standard reply forms to:

By e-mail: planning.policy@bradford.gov.uk

In writing:

Please return your representation(s) to City of Bradford Metropolitan District Council, Local Plan Team , 4th Floor, Britannia House, Hall Ings, Bradford, BD1 1HX no later than 5pm on Friday 22nd February 2019.

The Council will also be holding a series of public consultation events across the District and a list of these events are set out at the end of this Notice.

Julian Jackson, Assistant Director, Planning, Transportation & Highways

Where	Date	Time
Saltaire Victoria Hall Victoria Road, Shipley, BD18 3JS	Monday 21st January 2019	3:30pm-7:30pm
Keighley Central Hall Alice Street, Keighley, BD21 3JD	Thursday 24th January 2019	3:30pm-7:30pm
Ilkley Clarke Foley Centre Cunliffe Road Ilkley LS29 9DZ	Tuesday 29th January 2019	3:30pm-7:30pm
Bradford City Hall Centenary Square, Bradford BD1 1HY	Thursday 31st January 2019	1pm-5pm

Plan-it Bradford

Issue 28

DECEMBER 2018

Plan-it Bradford is the e-newsletter that keeps you up to date with the latest planning policy news and the progress being made on the Local Plan for the Bradford District.



Bradford Core Strategy Partial Review: Shaping Our Future Policies

The Core Strategy forms an essential part of the Local Plan for Bradford. It sets out how many homes the District needs and where these should be provided. It also establishes strategic employment, transport and infrastructure priorities and policies to protect and enhance the natural and built environment. We use the Core Strategy policies to help determine planning applications.

As the Core Strategy is such an important document it is vital that the Council reviews it and makes sure it is relevant and up to date.

After changes in national policy and updated local priorities the Council has identified key areas in the Core Strategy that requires reviewing and particularly around housing and employment.

The first stage in this partial review process involves establishing the range or scope of policies for updating.

We welcome your feedback on our initial approach. It is an early opportunity to help shape Bradford's planning policies for the future and ultimately the place you live, work and enjoy.

The consultation will take place from Friday 11th January 2019 and will last six weeks.

Further details including events will be available on the website.

Any information we receive will be processed in accordance with the Data Protection Regulations 2018.



Inside

- ▶ Bradford's Brownfield Sites Register
- ▶ Driving Forward Plan-making
- ▶ Green Belt – A Selective Review
- ▶ Updating our Understanding of Housing Needs

www.bradford.gov.uk/planningpolicy



Appendix 2 - Core Strategy Partial Review - General Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General – Support		
	1a. Welcome the Council is moving on with the preparation of its Local Plan and intends to make progress on the Core Strategy Review and the Site Allocation Plan.	Noted.	CSPR017
	1b. Welcome the opportunity to provide feedback on the Council's Scoping Report into the Bradford Core Strategy Partial Review.	Noted.	CSPR002 CSPR005 CSPR008 CSPR010 CSPR011 CSPR012 CSPR013
	2. General comments		
	2a. No comment	Noted	CSPRQ002 CSPRQ004 CSPRQ021 CSPRQ023

Appendix 2 - Core Strategy Partial Review - General Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
			CSPRQ058 CSPRQ107
	2b. Too general.	Comment noted. This is the initial scoping stage of the review of the Core Strategy; further details will be published at the next stage.	CSPRQ026
	2c. Craven District Council has no specific comment to make in this regard.	Noted	CSPR019
	2d. Following a review of the documents I can confirm that the Coal Authority has no specific comments to make on the Partial Review as currently proposed.	Noted.	CSPR027
	2e. All current consultation should comply with the most up to date legislation and policies at the time of the next consultation stage which may be after Brexit and thus might impact on some of the EU legislation that has not been incorporated in UK law.	Comment noted. Each stage of plan production will have due regard to the most up to date legislation, regulations and guidance available at that time.	CSPR016
	2f. Hope you get the required support from the government!	No comment required.	CSPRQ005
	2g. The overall focus has to be on making Bradford a better place to live. Both in work and retirement. The	Noted.	CSPRQ007

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	focus needs to be on providing the infrastructure to allow people to live in dignity. This is a tough ask but we need to realise we are heading for a crisis for both the young starting out in life and the elderly who have made this country what it is now.		
	2h. Decisions should be made at the most local level possible. Politicians and bureaucrats are becoming detached from the people they "serve". Too many damaging decisions are made by councils who have no skin in the game, who do not pick up[the pieces, who suffer no consequences for their actions. And this is wrong. The resulting social, cultural, environmental deficits and damage will continue to mount up and that may lead to political upheaval eventually.	No comment required.	CSPRQ014
	2i. The council needs to start listening to the people and not pushing forward with its own agenda regardless.	No comment required.	CSPRQ028
	2j. Do not spend too much as usually happens with no results on these things most is common sense so get on with things.	No comment required.	CSPRQ029
	2k. Planning to be adhered to and more regulations about retrospective planning	No comment required.	CSPRQ030
	2l. It's poor and lacks appropriate scrutiny	No comment required.	CSPRQ031

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	2m. You won't listen to a word of this. Keep off th3 green belt. Update transport links. Use brownfield sites. Hold developers to account.		CSPRQ032
	2n. At least someone is thinking about what we need and how to sort it. Of course the law of unintended consequences and unexpected social and technology changes are going to play their part. But doing nothing or leaving it to the 'market' are not good solutions. Those who never make a mistake never make anything. Those who admit their mistakes and learn from them progress. (note this defacto for air transport)	No comment required.	CSPRQ033
	2o. The planning process needs to improve its credibility and transparency, and demonstrate that up-to-date information can be taken on-board more quickly than has been the case over the last three years. Detailed research by outside consultancies should not be necessary to achieving a better approach.	Comments noted – the evidence base for the Core Strategy has been developed through commissioned technical expertise and work in-house.	CSPRQ051
	2p. Look at the existing council estates and invest in these young people, they feel unimportant and left behind. It is their future too.	The partial review picks up a stronger focus upon regeneration and estate renewal.	CSPRQ063
	2q. Preserve sufficient urban greenspace within each settlement to ensure easy access to open space for	The importance of local and strategic Green Infrastructure remains a strong theme through the	CSPRQ072

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	residents without need to travel by car.	CSPR.	
	2r. It's hard to comment on the report as it is a lot of heavy documents that don't really say much. Obviously specific areas will have their own concerns.	Consultation focused upon scoping issues and policies with subsequent stages to provide preferred options and policy detail.	CSPRQ086
	2s. Where housing developments are increasing, so should resilience for local amenities, it cannot be acceptable for schools, doctors surgeries etc to continue to be expected to do more with less	The Core Strategy and Allocations DPD will be accompanied by a comprehensive Local Infrastructure plan, which reviews the capacity of local education and health infrastructure.	CSPRQ087
	2t. The level of development around Apperley Bridge is outrageous.	No comment required.	CSPRQ088
	2u. Careful consideration about what is best for all Bradfordians needs to be priority. Consequency for actions and accountability of councillors needs addressing. Everyone should work hard to achieve.	No comment required	CSPRQ100
	2v. I sincerely hope that the review gives due consideration to all the feedback from residents and that it isn't driven by financial gains obtained from developers contributions	Feedback from the consultation has been built into key considerations for the review.	CSPRQ102
	2w. Include, if you can- a policy to give preferential planning to local shops, and local gyms, local health ,new schools etc to ease the burden of social mobility on the network and to reduce commutes to the	The Core Strategy supports local community infrastructure and facilities through a number of policies, including retail and leisure and sub-area	CSPRQ010

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	<p>services which are not available in the local area. (by local, I mean the same town) Please include a GUARANTEE that the protection of the Green Field sites will be honoured and upheld; insofar that that no planning, unless for enhancement of the land (soft-landscaping) is carried out. Manage the distribution and phasing-in of new housing by assessing the impact of each new-build community (more than 50 houses) after a period of six-months on the effects of social and transport infrastructure, health and pollution. Then release the next phase if the area is within acceptable parameters for the above tests.</p>	<p>policies.</p> <p>The plan has a strong focus upon the re-use of brownfield land before consideration of greenfield development. Detailed reviews of individual schemes post-completion is beyond the scope of the Core Strategy. Changes in infrastructure pressures is analysed through the Local Infrastructure Plan which is a living document.</p>	
	<p>3. General – Consultation</p>		
	<p>3a. The survey is quite specialist. It's difficult to respond to many of these questions without a background in the current planning process. I'm not sure how useful it is.</p>	<p>Comments noted</p>	<p>CSPRQ034</p>
	<p>3b. This survey is in a helpful format. Not sure what a 'scoping report' is. Obviously the consultation needs to be time limited. Our Town Council sought direct representation in this process in the interests of efficiency. No one was available to meet with us within this time period.</p>	<p>The consultation was run over 6 weeks and involved on-line and face-to-face events. It isn't always possible to accommodate 1-2-1 meetings although the Council did attend the Parish and Town Council Forum.</p>	<p>CSPRQ056</p>
	<p>3c. This survey is not easy to use; a yes/no answer approach, or multiple choice approach, with some</p>	<p>The Council has adopted an easier to follow</p>	<p>CSPRQ081</p>

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	<p>space for free comments, would be better. The core strategy document itself is not easy to use - there are pages and pages of padding and boiler plate paragraphs, and it is so big that really it needs to be printed in order to use, but who is likely to print something so big? The recent consultation in Ilkley was poorly advertised and the event was hidden away right at the back of the Clarke Foley centre - I bet attendance was low. These look like incompetent communications. Some others might suggest of course that it is a cynical move by Bradford Council to obfuscate, and make it difficult for residents to understand and comment.</p>	<p>survey format for future publications.</p> <p>The consultation in Ilkley was well advertised and hosted in an accessible central venue. Comments could also be made on-line and in writing for those unable to attend the drop-in event.</p>	
	<p>3d. Why is that not distributed to every household in the district rather than sitting as a hidden away document that existing residents have to search for. Not one resident of the district should say "I was not aware of these potential developments".</p>	<p>The consultation was advertised in the Council's Plan-It newsletter and through a press release, which was picked-up through local media. It is not cost effective to distribute the consultation to every household in the District.</p>	<p>CSPRQ105</p>
	<p>3e. When inviting the public to take part in this consultation exercise more effort should be made to advertise it on social media (as print media circulation is falling) and supply hard copies of the documents in all public libraries. It has been said that the public can use the computers in these locations to look at the review but they won't do that unless they know that a review is taking place.</p>	<p>Comments noted regarding social media – the local plan team did use its own twitter account for communications during the consultation but still needs to build additional following.</p>	<p>CSPRQ110</p>

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	Secondly more needs to be done regarding inclusivity. Who would even know what a Core Strategy Partial Review was without spending a lot of time researching it. More needs to be done to give these documents more self explanatory titles and provide more information about their importance	Comments noted regarding communication – it is recognised that the scoping of issue and policies is one of the more abstract stages in plan making.	CSPRQ110
	4. General - Duty to cooperate		
	4a. North Yorkshire County Council (NYCC) welcomes the opportunity to engage with the District Council as part of our on-going Duty to Co-operate on strategic matters.	Noted.	CSPR040
	4b. NYCC welcomes future opportunities to review and comment on the spatial distribution and specific sites which may give rise to impacts upon the infrastructure and services of the County Council if necessary as work on the Partial review progresses.	Noted.	CSPR040
	4c. It also important for the Council to take into account the responsibilities under the Duty to Cooperate, and demonstrate that meaningful engagement has occurred, particularly with neighbouring authorities.	Noted. The Council has taken full account its responsibilities under Duty to Co-operate to demonstrate meaningful engagement with neighbouring authorities.	CSPR017

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	4d. Please include the adoption of a engagement group working with Skipton and Pendle Councils to scope the future for the revision of the cross -border railway-line extending from Colne to Skipton. This can be achieved using the Northern Powerhouse Rail Initiative. Unless there are extensive road-widening schemes, including a protected cycle-network, I am not sure how the infrastructure can cope.	Issue to be picked up through the Duty to Cooperate work programme.	CSPRQ010
	5. General – Timescale / Local Development Scheme (LDS)		
	5a. The proposed timescales in the LDS (July 2018) for several documents including the Core Strategy, Site Allocations DPD, Proposals Map and Green Belt Review, already seem to have fallen behind schedule. The timescales should be reviewed and updated.	The SCI will be updated prior to Regulation 19 on the Core Strategy and Allocations DPD.	CSPR016
	5b. It is considered that the proposed timetable may be ambitious with adoption by December 2021.	Agree – adoption may be more realistic during 2022 and is reflected in the updates to the plan period included within the CSPR Preferred options document.	CSPR017
	5c. The Council's Local Development Scheme, published in July 2014 and covering the period 2014 - 2017, targeted adoption of this document by late 2017. The more recent Local Development Scheme for the	The CSPR is progressing at pace with the Allocations DPD to follow shortly. The Council does not consider that there is a need to include	CSPRQ021

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	<p>period 2018-2021 published by the Council in July 2018 indicated that adoption of the Land Allocations Plan will not occur until 2021, and we understand that the timescales for production of this document has now slipped yet again from the milestones indicated in the latest LDS and will no longer run in tandem with the Core Strategy Review. In light of this further slippage, we consider that the scope of the Core Strategy Partial Review should be expanded to accommodate strategic housing allocations (i.e. the largest and strategically most important sites across the District). This matter is discussed in further detail within these representations.</p>	<p>additional strategic housing allocations beyond the Holme Wood SUE in the Core Strategy.</p>	
	<p>6. General – Plan preparation</p>		
	<p>6a. The adopted plans' housing requirement was based on an economic uplift in order to meet the aspirations of the Council and to ensure that sufficient homes existed to provide the appropriate workforce to deliver the Councils economic plans. That plan relied upon a separate allocations document to deliver the homes needed, however to date this document has never been released for consultation.</p>	<p>The Allocations DPD will be published in Autumn 2019 for public consultation.</p>	<p>CSPR037</p>
	<p>7. General –Timescales / Site Allocations</p>		

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	7a. General concern with the timing of the C SPR, prior to the adoption of the Allocations document.	Noted	C SPR018
	7b. The Council need to ensure a quick review but more importantly the release of the necessary land to deliver the review. Without this the Councils recent failures will only be exacerbated.	Noted	C SPR032 C SPR037
	7c. Any review of the CS cannot delay this process any further and would need to be predicated on both the CS and the allocations being combined.	It is likely by the Regulation 19 stage that the CS and Allocations DPDs will be fully aligned, rather than combined.	C SPR037
	7d. Whilst plans should be flexible enough to respond to changing circumstances, they also need to provide certainty for residents and developers alike. An early review of the Core Strategy prior to the adoption of a vital element of the plan does not provide such certainty.	The C SPR will provide clarity over revised housing and employment requirements, which will better inform the Allocations DPP in light of changes to national and local policies.	C SPR018
	7e. There are concerns that the decision to review a recently adopted Plan is unnecessary and will lead to further delays in the delivery and adoption of the SAP, which needs to come forward as soon as possible given the District's long standing acute housing requirements.	The Allocations DPD will be published in Autumn 2019 for public consultation.	C SPR018 C SPR032 C SPR033 C SPR037

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	7f. The delays to the site allocations plan have led to significant under delivery within the District and a failure of the Council to meet its own ambitions.	The Allocations DPD will be published in Autumn 2019 for public consultation.	CSPR037
	7g. Para 0.3 - The Council have consistently delayed any consultation relating to the SAP and in over two years have only consulted on a Green Belt methodology and Issues and Options. This delay has been unacceptable and can be seen in the Councils recent failure to meet the Housing Delivery Test.	The Allocations DPD will be published in Autumn 2019 for public consultation and Housing Delivery Test Action Plan published in August 2019.	CSPR037
	7h. The Council's focus and resources should be put into delivering the SAP in line with the adopted and sound Core Strategy.	Resources have been effectively applied to delivering the Allocations DPD.	CSPR037
	7i. At the previous Core Strategy hearings, the officers frequently referred and mentioned other documents such as the site allocations document which had not been completed at that time. Why have these not been completed to date and prior to this re-view? Housing numbers obviously needs further review and consultation with neighbouring authorities(North Yorkshire/Craven) Land ownership needs re-view? Infrastructure information previously provided on Gas, Water, Electric in Silsden appears to have been	The Allocations DPD will be published in Autumn 2019 for public consultation. A Local Infrastructure Plan is also under development to support the CSPR and Allocations DPD.	CSPRQ108

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	unsound. The full implications of the extensive works required and implications on the local community have not been fully addressed.		
	8. Timescales for adoption		
	8a. The preparation of Local Plans invariably slips and we would anticipate that a more realistic time period would be 2-3 years for adoption.	The CSPR now includes a forecast adoption date of 2022 in consideration of any potential slippage in the work programme.	CSPR032 CSPR033
	8b. In a District which has consistently failed to deliver its annual housing requirement and which is heavily constrained by Green Belt, these timescales are not acceptable.	The annual housing requirement and extent of Green Belt release forms central themes to the CSPR.	CSPR017
	8c. If adoption [in Dec 2021] is the case, we would suggest that the Local Plan period is rolled forward to at least 2037, this will then comply with the minimum 15 year horizon for strategic polices set out in the Framework.	The CSPR now includes a forecast adoption date of 2022 in consideration of any potential slippage in the work programme. The end of the Local Plan period is now forecast to 2037.	CSPR017
	9. Justification for the review		
	9a. The Council's approach of revisiting the Core Strategy following changes to national policy is prudent. It is important that the Council has an up-to-	Noted.	CSPR017

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	date development plan in place. However, this is dependent upon how the Council interprets revisions to national policy.		
	9b. Welcome the references to pragmatism contained within the consultation documents, insofar as the Council agree that various factors feed into the assessment of an appropriate housing requirement, particularly the need to sustain and promote economic growth and job creation/retention. Providing an appropriate choice of housing opportunities is key to economic prosperity and it is encouraged that the Council are mindful of this key principle in considering further whether to revise its adopted housing target.	Comment noted.	CSPR001
	9c. Where there is a change in base data, the Council should not jump upon new data to reduce the housing requirement, for instance, simply to mask the lack of delivery of housing numbers.	Noted.	CSPR017
	9d. The Council's Core Strategy was adopted on the basis that there was a full objectively assessed need for the level of housing proposed, and it was submitted and adopted prior to January 2019, and as such there is no obvious justification to review the Plan at this	The justification for undertaking the CSPR was detailed in the scoping consultation documentation including changes to both national and local planning policies. The Council has a responsibility to ensure that its plan and policies	CSPR018 CSPR032 CSPR033 CSPR037

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	stage given the chronic shortfall in housing delivery in the District. The introduction of the standard methodology through a review of the Core Strategy, will only further exacerbate the problem, and as such our client objects to the principle of a CSR at this stage.	are up to date and remain relevant.	
	9e. The standard methodology was introduced through the revised Framework, which itself indicated that a transition would be in place for plans submitted in the transition period, indicating that plans should not be delayed simply to meet lower figures. The Councils decision to review the plan in order to simply reduce housing numbers is not positively planned and is failing the needs of the District.	The justification for undertaking the CSCR was detailed in the scoping consultation documentation including changes to both national and local planning policies. The Council has a responsibility to ensure that its plan and policies are up to date and remain relevant.	CSCR037
	9f. In our view an early review of this nature is unjustified. The Council should instead focus on delivering the objectives of the existing Core Strategy through the adoption and implementation of the supporting Allocations document.	The justification for undertaking the CSCR was detailed in the scoping consultation documentation including changes to both national and local planning policies. The Council has a responsibility to ensure that its plan and policies are up to date and remain relevant.	CSCR018

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	<p>9g. Whilst it is acknowledged that some changes have recently occurred in national planning policy and in regards to the calculation of housing needs, the Core Strategy was adopted with a view to it being sufficiently robust and sound to remain the key guiding strategic document through the entirety of its plan period, taking account of any changes in national policy or associated matters that would occur within this time.</p>	<p>Noted.</p>	<p>CSPR001</p>
	<p>9h. There are genuine concerns regarding the suitability of the standard method at this stage, which has been acknowledged by MHCLG and the National Audit Office and there are question marks as to whether it is fit for purpose in its current form.</p>	<p>Government is clear on the requirement to apply the Standard Method.</p>	<p>CSPR037</p>
	<p>9i. The unnecessary review of the plan is considered to add yet more delay and continues to stifle growth within Bradford.</p>	<p>The justification for undertaking the CSPR was detailed in the scoping consultation documentation including changes to both national and local planning policies. The Council has a responsibility to ensure that its plan and policies are up to date and remain relevant.</p>	<p>CSPR037</p>
	<p>9j. There are concerns that the introduction of a reduced housing figure will also have a knock -on</p>	<p>The CSPR Preferred Options is presenting strong housing growth figures and retaining jobs growth</p>	<p>CSPR037</p>

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	effect on the Council's economic growth aspirations. The two factors combined will stagnate the development and growth of the City, and this has to be avoided	targets.	
	10. General – Approach to the review		
	10a. The Revised Core Strategy should be prepared on a sound and robust basis and that the correct provision of housing is provided throughout the plan period to meet the needs of residents within the District.	Noted.	CSPR044
	10b. Para 3.1 notes additional topic areas for the review which we concur would bring the documents up to date with current national guidance.	Noted.	CSPR016
	10c. We do not believe it is appropriate to adopt a wholesale review of the Core Strategy, so soon after its adoption and pre-adoption challenge.	Noted.	CSPR001
	10d. Support the need to retain a higher overall housing need figure and the release of Green Belt land which performs poorly against the five purposes.	Support noted.	CSPR015 CSPR014

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	10e. Based on a new LHN Assessment, BMDC should continue their scale of housing based on at least 2,477 dwellings a year to consolidate themselves as an ambitious authority and to ensure vitality and viability across the region to make sure Bradford achieves its aim of being the UK's fastest growing economy over the coming decade (2018-2028). In the interests of effective and positive plan making.	Comment noted.	CSPR034
	10f. Extenuating circumstances continue to exist in Bradford which help to justify release of greenfield sites. There has been a persistent under delivery against housing targets and due to constrained land, impacted by viability, Green Belt and land availability.	Noted.	CSPR014 CSPR015
	10g. New housing, business and tourism and local facilities should all be addressed by means of a Neighbourhood Plan as set out in the Localism Act. This should involve local consultations and reflect how residents wish to see the town develop.	National planning policy is clear that strategic policies on such issues as housing and employment need should be set out in the local plans and neighbourhood plans should support the delivery of strategic policies (NPPF para. 13).	CSPR046
	10h. It is accepted that there is a potential need for some limited expansion of housing but that this should relate to local need – following local consultation.	Comment noted.	CSPR046

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	11. General –Plan period		
	11a. commit to a time frame and make it happen!	Noted	CSPRQ060
	12. General – Policy SC2 Climate change		
	12a. The effects of climate change should be at the centre of the Core Strategy. Building in areas where there is congested traffic and little or no public transport is exacerbating the problem. In everything we do, we need to be aware of the impact on the environment.	Climate change and its effects are addressed in Policy SC2 and is embedded throughout the Core Strategy, as adopted.	CSPR039
	13. General – Policy SC4 Hierarchy of settlements		
	13a. Bradford should continue to incorporate a hierarchy method for the distribution of housing development. The main focus of housing should be within the main built up areas of the District, especially Bradford City Region and with the focus for growth the regeneration opportunities for South East Bradford and its planned investment. In the interests of justified and effective plan making.	Comments noted. The CSPR continues to adopt a settlement hierarchy approach to the distribution of growth.	CSPR034

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	14. General – Policy SC7 Green Belt		
	14a. We do however have fundamental concerns in respect of a major review of policy SC7 (Green Belt).	Noted.	CSPR034
	14b. Bingley Town Council is keen to protect green belt wherever possible	Noted.	CSPRQ068
	14c. Clayton, Clayton Heights, Mountain, Queensbury and Allerton are already oversubscribed for planning applications as there is an insufficient local road infrastructure which can cope with or meet an increased volume of traffic. Please now, respect the green-belt, ensure there is a distinct green -space buffer zone between the communities. Please include the adoption of a engagement group working with Skipton and Pendle Councils to scope the future for the revision of the cross -border railway-line extending from Colne to Skipton. This can be achieved using the Northern Powerhouse Rail Initiative. Unless there are extensive road-widening schemes, including a protected cycle-network, I am not sure how the infrastructure can cope. Include, if you can- a policy to give preferential planning to local shops, and local gyms, local health ,new schools etc to ease the burden of social mobility on the network and to reduce commutes to the services which are not available in the local area. (by local, I mean the same town)	The Council considers that exceptional circumstances can be demonstrated for the limited release of Green Belt land to support housing growth in a limited range of locations. When considering the exact locations to release land attention will be paid to the five purposes of the Green Belt set out in national policy including preventing neighbouring towns merging into one another.	CSPRQ010

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	<p>Please include a GUARANTEE that the protection of the Green Field sites will be honoured and upheld; insofar that that no planning, unless for enhancement of the land (soft-landscaping) is carried out. Manage the distribution and phasing-in of new housing by assessing the impact of each new-build community (more than 50 houses) after a period of six-months on the effects of social and transport infrastructure, health and pollution. Then release the next phase if the area is within acceptable parameters for the above tests. Compare the real-effects against the projected effects during the application process (if in fact such pre-assessment exists) Always consider brown-field developments and re-use before brand new builds. Give developers incentives to re-use old mills for example to help offset the cost of redevelopment., The phase 'affordable -housing ' needs to be revised per district and the actual mean-incomes of people in the area. the 20% reduction in current market values is just insufficient as wages are not going up to meet the costs of new builds or current 'affordable housing'. Local policy must exist to keep the affordable -housing, affordable. Penalise developers who land-bank, without submitting plans within three years of land acquisition, or who fail to build within five years of acquisition. Preferential policies should be introduced to build affordable social-housing in conjunction with the council.</p>		

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	14d. There is so much city and town centre dereliction that it is unbelievable that green belt development of any kind, is even considered. Once that's gone, it's gone.	The CSPR Preferred Options places a strong and enhanced emphasis upon maximising brownfield regeneration. But sites also need to be deliverable and developable, with some brownfield locations unlikely to be built out during the plan period.	CSPRQ079
	14e. I strongly agree we need a plan but object to the massive use of urban green space and green fields. I am disgusted that local developers have been given opportunity to promote future land for development but the general public have had little promotion to have their say. . I have found this plan purely by chance !!! And I pay my rates !!!	The CSPR PO proposes a limited release of Green Belt land to support meeting our housing needs. This is at a lower scale than that set out in the adopted Core Strategy.	CSPRQ083
	14f. Infrastructure, schools and services are in high demand, more homes are needed but you face bigger issues that will take years to solve if not put right now. Do not build on the last remains of green belt in Bradford	The Local Infrastructure Plan is an important document which sits alongside the Local Plan and provides an analysis of infrastructure programmes and potential pressures through development. The availability of local schools to accommodate growth is considered as part of plan-making and final site allocations. The Bradford Green Belt amounts to orca 65% of the land mass for the District, the limited Green belt release proposed through the Preferred	CSPRQ089

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		Options document only involves a very small loss of this overall land mass.	
	14g. far too much green belt land being proposed to be used as building development	The Council's Preferred Option through the CSPR is for a limited release of Green Belt land only to accommodate housing growth.	CSPRQ090
	15. General – Health		
	15a. The environment, public health and integrated communities should be at the heart of all housing policy decisions.	Agree. The CSPR Preferred Option document now includes a Healthy Places Strategic Core Policy with health, environment and community themes integrated throughout other policy areas.	CSPRQ049
	16. General – Policy PN1 South Pennine Towns & Villages (Haworth)		
	16a. Haworth Cross Roads & Stanbury (Ref: Policy PN1) requires any such developments to be sympathetically considered not only on planning merits, but also on its impact on the community, tourism and the moorland landscape. We request that any such development be carefully considered on its aesthetic impact and what benefits it would bring to the area. It is recommended that all retail units are located in the centre of each Village which would allow easy	Comment noted.	CSPR020

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	walking distance for residents.		
	17. General – Economy and Jobs		
	17a. Supporting small local initiatives and having staff to assist these to prosper should be a vital part of this plan.	The plan is supportive of economic growth with the ambition to deliver at least 1600 jobs per annum. The majority of these jobs are to be delivered through non-B uses classes (jobs other than traditional employment uses – offices, industrial etc).	CSPRQ009
	18. General – Transport		
	18a. please plan for off road cycling and walking to link these new allocations	Ensuring that new developments are well supported by walking and cycling networks is a key theme in the CSPR Preferred Options transport policies.	CSPRQ039
	18b. Bingley Town Council would urge Bradford District Council to include a travel and transport plan for each new development.	Above thresholds set out by the DfT and applied locally the Council requires all new build and change of use developments which lead to a potential increase in movements to provide an approved transport assessment / statement and Travel Plan in accordance with DfT guidance.	CSPRQ068

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	<p>18c. The major omission is that of Tourism and Recreation. Although it states that TR4 doesn't require review, the need to consider tourism and recreation when choosing development sites, must be included. SHLAA should not contain Green Belt sites, and there MUST be a process for public consultation on the sites contained in the SHLAA. Developers are using this document to assume they can submit plans for any of the sites listed; this is wasting a lot of time and resource for everyone.</p>	<p>The land database has been developed to a combine employment land uses and site promoters are encouraged to submit information on the range of uses which may be suitable for an available site.</p>	<p>CSPRQ078</p>
	<p>19. General – Economy and Jobs</p>		
	<p>19a. Supporting small local initiatives and having staff to assist these to prosper should be a vital part of this plan.</p>	<p>The plan is supportive of economic growth with the ambition to deliver at least 1600 jobs per annum. The majority of these jobs are to be delivered through non-B uses classes (jobs other than traditional employment uses – offices, industrial etc).</p>	<p>CSPRQ009</p>
	<p>19b. Bingley Town Council wish to highlight the link between increased housing and increasing local employment opportunities to ensure Bingley does not become a dormitory town</p>	<p>Comments noted.</p>	<p>CSPRQ068</p>
	<p>19c. In summary .apply new housing calculation formula..use current strategies to.inform policy , look</p>	<p>The standard method has been applied for calculating minimum housing need and a strong</p>	<p>CSPRQ037</p>

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	<p>for innovative quick wins on brownfield sites and cease all plans and future plans to build on green belt sites . Green belt should be protected at all costs .</p>	<p>approach adopted to the re-use of brownfield sites. The CSMR Preferred Option proposes a limited release of Green Belt land to support housing delivery.</p>	
	<p>19d. Manage the distribution and phasing-in of new housing by assessing the impact of each new-build community (more than 50 houses) after a period of six-months on the effects of social and transport infrastructure, health and pollution. Then release the next phase if the area is within acceptable parameters for the above tests. Compare the real-effects against the projected effects during the application process (if in fact such pre-assessment exists) Always consider brown-field developments and re-use before brand new builds. Give developers incentives to re-use old mills for example to help offset the cost of redevelopment., The phase 'affordable -housing ' needs to be revised per district and the actual mean-incomes of people in the area. the 20% reduction in current market values is just insufficient as wages are not going up to meet the costs of new builds or current 'affordable housing'. Local policy must exist to keep the affordable -housing, affordable. Penalise developers who land-bank, without submitting plans within three years of land acquisition, or who fail to build within five years of acquisition. Preferential policies should be introduced to build affordable social-</p>	<p>The capacity of brownfield site and the re-use of former mills have been considered as part of the housing delivery.</p> <p>The SHMA assessment and CSMR Preferred Option provides a breakdown of the affordable housing level requirements per sub-area.</p>	<p>CSPRQ010</p>

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	housing in conjunction with the council.		
	19e. I am concerned that the Core Strategy concentrates the large majority of land allocated for employment use within the City of Bradford, largely to the south of the city, and yet extensive housing growth (in Local Growth Centres) is proposed for areas to the north of Bradford. This will increase commuter journeys which will only exacerbate the issues with the road and public transport infrastructure.	The CSPR Preferred Options report maintains the settlement hierarchy as set out in the adopted Core Strategy, but revises minimum growth levels.	CSPRQ074
	20. General – Policy HO1 Housing requirement		
	20a. It's really important for the future of Bradford that reassessment is done on housing, across the district we have empty housing and instead of looking at ways to utilise this we damage our infrastructure building new.	A new Strategic Housing Market Assessment (SHMA) and Housing Survey has been undertaken to support the CSPR Preferred Options.	CSPRQ055
	21. General – Policy HO1 Housing requirement		
	21a. Overall, we support a higher housing need figure in line with the 2017 Core Strategy and the release of Green Belt land which perform poorly against the five purposes.	Support noted.	CSPR034
	21b. Bingley Town Council is supportive of a reduced	Noted.	CSPRQ068

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	housing requirement		
	21c. We have fundamental concerns in respect of a major review of policies HO1 (Housing Requirement).	Noted.	CSPR034
	21d. Whilst net housing delivery has not yet delivered the average annual housing requirement identified by the Core Strategy it is moving in the right direction. This has been achieved without the additional certainty provided by up to date housing allocations which would undoubtedly provide a significant boost to supply across the district.	Comment noted.	CSPR018
	21e. There has been a persistent under delivery against housing targets due largely to heavily constrained land, impacted by Green Belt and land availability.	Comment noted.	CSPR034
	22. General - Policy HO2 Strategic Sources of Supply		
	22a. Policy HO2 has already set out the main strategic sites which should be brought forward and it is our view that of these the South East Bradford Urban Extension should be the first priority as it represents a comprehensive regeneration and investment in to the	Comment noted.	CSPR034

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	Holme Wood District area. It is understood that these are not being significantly reviewed as part of this scope and this is supported.		
	22b. The thrust of these representations maintain that the circumstances continue to exist in Bradford to warrant substantial SUEs such as the land at Raikes Hall and justify the release of Green Belt sites. This is confirmed through the lack of a major review of policy HO2, a decision supported by these representations.	Support noted.	CSPR034
	23. General – Policy HO3 Distribution of Housing Development		
	23a. We do however have fundamental concerns in respect of a major review of policy HO3 (Distribution).	Comment noted.	CSPR034
	23b. The current distribution of new homes to Keighley should be retained in order to support, protect and enhance Keighley's role as a Principal Town in the District, as it provides a strong focus for local communities, in terms of service provision and employment and housing opportunities.	Comment noted.	CSPR043
	23c. Do we really need all the extra houses on idle moor? With no more schools being built where will all children go to school?	Comment noted.	CSPR025

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	<p>The roads around the idle and wrose areas are already busy and more houses and cars are not going to help the situation. It this rate there will be no green spaces left for children to play and people to enjoy! Bradford is just one big building site at the moment.</p>		
	<p>24. General – Policy HO4 Phasing and release of housing sites</p>		
	<p>24a. To ensure phasing policy is flexible and the concept of safeguarded land introduced in the interests of positive and effective plan making.</p>	<p>A limited level of safeguarded land is proposed within the CSPR Preferred Option document.</p>	<p>CSPR034</p>
	<p>25. General – Policy HO8 Housing Mix</p>		
	<p>25a. Bradford must be able to accommodate a range of people including young professionals, elderly and those unable to afford market values. Bradford should also provide each district with their own specific housing mix to replicate the differences within the region. This will allow for positive, effective and justified plan making throughout the plan period.</p>	<p>Comments noted - Housing choice is essential in meeting the wider housing needs of the District. Sustainable mixed communities require a variety of housing in terms of size, type, tenure and price to meet the needs of different households. A key objective is to ensure that planned housing growth will deliver a mix and balance of housing, which meets the future needs of the District's population and household growth. Specific guidance on housing mix in an area or site basis will be set out as necessary in the Allocations</p>	<p>CSPR034</p>

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		DPD.	
	<p>25b. Paragraphs 1.9 and 1.10 of the Council's Scoping Report (Jan 2019); the Council recognises that the introduction of the standard methodology for assessing local housing need; represents a 'minimum target'. It does not take account of other government policies or economic circumstances which may influence the amount of housing that is needed. This point must be re-emphasised.</p>	<p>It is noted that the outputs from the Standard Method are a minimum target.</p>	CSPR028
	<p>25c. Housing and economic development are intrinsically linked. It is our understanding that the adopted OAN figure for Bradford at 2,477dpa was influenced by economic factors, which the standard methodology does not take into account. This includes existing and future economic activity and economic growth rates, jobs growth, unemployment, commuting patterns and cross-boundary employment flows.</p>	<p>The Council has reviewed economic uplift considerations and do not consider that there a strong economic case for economic uplift beyond the Standard Method minimum calculations.</p>	CSPR028
	<p>25d. This is particularly pertinent given the uncertainties at the current time regarding the suitability and effectiveness of the standard methodology.</p> <p>Indeed, the recent Ministry of Housing, Communities &</p>	<p>While there are criticisms of the Standard Method, it is clear within national planning policy that strategic policies should be informed by a local housing need assessment, conducted using the standard method and as set out in the NPPG.</p>	CSPR032

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	<p>Local Government (MHCLG) consultation document entitled 'Technical consultation on updates to national planning policy and guidance', confirms that in the 2017 Budget the Government announced the intention to delivery 300,000 new homes per annum in England in order to ensure that the acute housing need is met in the country. However, the MHCLG standard methodology, if applied throughout the country would result in a maximum of 266,000 new homes and this situation has been further exacerbated by the recently published ONS 2016 population projections, upon which the standard methodology is based, which if applied would lead to only 213,000 new homes per annum.</p> <p>The standard methodology as currently drafted is clearly flawed both in terms of the number of homes that would be delivered, but also in the geographical split, which would see increased housing delivery in the south of England and a reduction in the vast majority of the north of England. This is clearly not the Government's intention and MHCLG have confirmed they will review the methodology and in the meantime have issued guidance on how it should be used in the interim. As such, the Council should not rely on the standard methodology at this stage as it is flawed, a</p>		

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	fact acknowledged by MHCLG themselves.		
	26. General - Housing		
	26a. Any new housing must be sustainable and carefully sited to avoid damaging the character and setting of the town and the wider surrounding area. Valuable productive agricultural land must be conserved.	Comment noted.	CSPR046
	26b. Any new housing will have little effect on the pressure within Bradford for additional housing because of the remote nature of Silsden.	Comment noted.	CSPR046
	26c. BMDC should continue to ensure that the correct amount of affordable housing and s106 contributions are provided with differing targets across the district and subject to viability assessments in the interests of effective and positive planning.	Agreed. Policies HO11 Affordable Housing, ID3 Developer Contributions and ID2 Viability set out the Council's expectations on these issues.	CSPR034
	27. General – Section 5.4 Environment		
	27a. Whilst we are encouraged by the inclusion of requirements for enhancement of the local environment through current policies, following the revision of the NPPF in June 2018 we feel these	The CSPR Preferred Options indicates strengthen environmental policies in consideration of air quality, climate change, Green Infrastructure and	CSPR026

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	policies can be further strengthened to be brought into line with the framework and other council strategies nationwide.	bio-diversity.	
	27b. Bingley Town Council would urge Bradford District Council to aim for higher environmental and building standards than the minimum requirements - To use the highest possible environmental standards	Comments noted.	CSPRQ068
	27c. The National Trust has a statutory responsibility to protect some of the most beautiful, historically important and environmentally sensitive places in England, Wales and Northern Ireland, for the benefit of the nation. As a consequence, we take an active interest in planning issues, particularly where there may be impacts upon the sites within the Trust's care. In the case of Bradford Council's Local Plan, we have particular regard to the heritage assets at East Riddlesden Hall, which is located within Airedale. I trust the above comments will be considered as part of the consultation process, however if you require any further clarification please do not hesitate to contact me.	Comments noted.	CSPR042

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	28. General – Policy EN1 Open Space / Green Infrastructure		
	<p>28a. Bradford District has a unique geography that is defined by its river valleys. These influence the historic patterns of development and movement and will be equally crucial in the future. They also offer a potentially powerful opportunity for sustainable development, through integrated approaches to: Climate change response and ecosystem resilience; Active travel and genuine modal shift away from car-dependent travel; Compact, polycentric settlement patterns with enhanced access to open space; Quality of life and public health.</p> <p>'Green and blue infrastructure' are therefore key, and we would wish to see the Partial Review harness this opportunity as enthusiastically as possible. As Bradford grows, so the need for its countryside and urban green spaces to work ever more effectively, and equitably, for communities. Returning to the question of Green Belt change, it is essential that any proposed changes take a net gain approach to green and blue infrastructure. We would be keen to work with the Council to develop the policies for this further. The Leeds City Region Green & Blue Infrastructure</p>	<p>Comments noted. Further policy work has been undertaken on the Green Infrastructure policy as part of the partial review and additional detail to follow through the Allocations DPD.</p>	<p>CSPR024</p>

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	Strategy 2017-36 provides a strong basis, but the Core Strategy needs to give spatial expression to that, both within Bradford and in inter-authority co-operation.		
	29. General – Policy EN2 Biodiversity		
	29a. The revised National Planning Policy Framework (NPPF) has significantly strengthened policy in relation to biodiversity net gain with planning policies and decisions to “provide net gains for biodiversity”.	Comment noted. The Council is proposing appropriate new bio-diversity net gain policies through the CSPR Preferred Options document.	CSPR045
	29b. Development plans need to apply this policy to local circumstances and develop their approach to net gain as new spatial development strategies are prepared and local plans are prepared or reviewed to comply with the revised NPPF.	Comment noted. The Council is proposing appropriate new bio-diversity net gain policies through the CSPR Preferred Options document.	CSPR045
	29c. Local planning authorities can require developers to provide biodiversity net gain where there is an appropriate policy in the development plan to support decision making and many developers will only commit to achieving biodiversity net gain where they are required to do so.	The Council is proposing appropriate new bio-diversity net gain policies through the CSPR Preferred Options document.	CSPR045
	29d. LPAs should set out a clear criteria based policy	Comment noted. The Council is proposing	CSPR045

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	<p>to achieve a measurable biodiversity net gain from new development that contributes towards local biodiversity priorities. This should:</p> <ul style="list-style-type: none"> - Be clear if biodiversity net gain is applying to all developments or just to large developments (smaller developers may need a more streamlined/simple approach). If only for large developments it should be clear about what your criteria for a 'large development' is and apply that criteria consistently. - If the biodiversity net gain policy extends to smaller developments be clear on the definition of smaller developments and consider 'biodiversity/habitat banking' as a way of streamlining biodiversity net gain. - A local planning authority, or other nature conservation partners, may be able to facilitate a larger biodiversity project that can benefit from small scale development contributions, by creating a habitat/biodiversity bank. - to use an evidence based metric when calculating biodiversity impact – encourage use of Defra metric (some local authorities specify its use) or variants based on this. If a local planning authority is suggesting an adaptation to the Defra metric, check that any adaptation is justified and in the interest of maximising local biodiversity gains. 	<p>appropriate new bio-diversity net gain policies through the CSPR Preferred Options document.</p>	

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	<ul style="list-style-type: none"> - Set out how developers will be expected to demonstrate delivery of biodiversity net gain (including use of an evidence based metric to calculate biodiversity impact and whether net gain should be provided on or offsite) - Set out site-specific biodiversity net gain aspirations for all site allocations. 		
	<p>30. General – Policy EN3 Historic environment</p>		
	<p>30a. Historic England strongly advises that the conservation team of your authority and your archaeological advisors at WYAS are closely involved throughout the preparation of the SEA/SA of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</p>	<p>Comments noted.</p>	<p>CSPR004</p>

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	30b. It provides the basis for the development of an appropriate framework for assessing the significant effects which this plan might have upon the historic environment.	Comment noted.	CSPR004
General – Section 5.5 Minerals and Waste Planning			
	<p>31a. Support for the approach taken to the partial review of the Core Strategy. The policies which are particularly relevant are:</p> <p>EN9 – New Mineral Application Sites EN10 – Sandstone Supply EN11 – sand, gravel, fireclay coal and hydrocarbons (oil and gas) EN12 - Minerals safeguarding WM11 – Waste management WM12 – Waste management</p> <p>Under Appendix 2 these policies are included and the justification for them not being included in the partial review of the Core Strategy. The justification provided is acceptable for all of these policies and we have no further comments to make.</p>	Support and comment noted.	CSPR040

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	31. General – Section 5.7 Design		
	32a. Ensure that high quality design and place making is supported through policy. In the interests of effective and positive planning.	Agree – CSPR policies are supportive of this approach and the Council has drafted a 'Homes and Neighbourhoods: A Guide to Design in Bradford' SPD for consultation.	CSPR034
	32. General –Section 6 - Infrastructure		
	33a. There should be no new housing until infrastructure problems; in particular transport, education and drainage have been addressed. Housing must be sustainable in these terms and should reduce the need to travel considerable distances to places of work.	Noted.	CSPR046
	33. General - SA / HRA		
	34a. Recommend that decision making on the supply and distribution of housing and employment land should be informed by the Sustainability Appraisal and Habitats Regulations Assessment as part of an iterative process.	Agreed.	CSPR045

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	34. General - Background documents		
	35a. The ability to comment on the Review process should be extended to the scoping/briefing documents for those preparing the housing and employment need assessments	The Council's briefs for commissioned work will not be subject to public consultation. All invitations to quote and tenders are placed on the YORtender website.	CSPRQ070
	35. General - Evidence base		
	36a. It is important that any emerging policies are based on a robust and up to date evidence base.	Agreed.	CSPRQ077
	36b. The findings of documents such as the SHMA, ELR and Green Belt Review are likely to be of key relevance to the Council's further consideration of any revised Core Strategy.	Agreed.	CSPR001
	36c. We note that other key documents e.g. SHMA and details of the 5-year HLS are still to be updated and thus we assume along with the current consultation documents all the updated documents will be put forward at the next stage of consultation.	Updates to the relevant evidence bases will be published, where appropriate, alongside the next iteration of the Core Strategy review.	CSPR016
	36d. Ensuring the baseline data is correct when considering amendments to the consultation	Comment noted.	CSPR016

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	documents is important. We have previously highlighted information errors in regard to our client's sites and trust these have now been corrected.		
	36. Evidence - Brownfield Register		
	37a. Para 4.1 refers to the Brownfield Register. Will there be a further Call for Sites as part of the next stage of consultation and the updating of the SHLAA? Will there be engagement with landowners and developers?	The Council is undertaking a focused call for sites for additional employment land in a number of strategically identified locations. This call for sites process will be undertaken from July to September 2019.	CSPR016
	37. Evidence base - Play Pitch Strategy		
	38a. Bradford are nearing completion with their Playing Pitch Strategy and this will provide the evidence base for pitch sport in Bradford. It can also be used to calculate any contribution that new development will need to make in order that they address the sporting needs arising from the development.	Noted.	CSPRQ077
	38. Comments on the Allocations DPD		
	39a. I would like to object to the proposed site allocation that uses Greenfield land at the side of the	This comment is not relevant at this time. Comments of this nature should be submitted	CSPRQ096

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	<p>Leeds Liverpool canal. I ma talking specifically about site references NE/065, NE/141, NE/069. I believe changing the use of this land to residential development would have a serious impact on wildlife as well as a social impact. Many people use the canal to get a taste of the countryside without the need to hop in a car and travel therefore using this greenspace would be counter productive to the environment causing more pollution and congestion with cars travelling further afield. Please do not give up this precious green space. There are plenty of brownfield sites that can be used to avoid this. Thanks</p>	<p>during the Allocations consultation which will be taking place in due course.</p>	

Appendix 3: Plan Period - Comments Received and CBMDC Response

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	Proposed Revised Plan Period – do you agree?		
	Yes = 93 respondents	Noted.	
	No = 43 respondents	Noted.	
	Not answered = 27 respondents	Noted.	
	1. General		
	1a. No comments	Comment noted.	CSPRQ029 CSPRQ068 CSPRQ103
	1b. I don't understand the implications of changing the period	This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ102
	2. Support Suggested Plan Period (up to 2035)		
	1a. Support	Comment noted.	CSPRQ002 CSPRQ008
	1b. Craven District Council officers support the proposed plan period as logical and appropriate for the purposes of plan making and review.	Support noted.	CSPR019

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	1c. We agree that the new plan period should run until 2035. This allows for Bradford to have a long -term strategy in place. This is seen as an acceptable period of time as other planning authorities which are progressing a plan from 2020 also run until 2035.	A wide range of comments were received in relation to the plan period. In reflection of the uncertainty that exists post plan submission the Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPR014 CSPR015
	3. Do not support suggested Plan Period (up to 2035)		
	3a. Do not agree with extending the period. Too many uncertainties to look so far into the future.	In reflection of the uncertainty that exists post plan submission the Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ041
	4. Adopt an Earlier Plan Period		
	2a. We consider that start date of plan should remain at 2013 otherwise policies and proposals could be out of kilter. We suspect that the proposal to move the start date of the Core Strategy to 2020 is to avoid catching up with the under delivery of 4,886 homes	Disagree. The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the	CSPR003

Appendix 3: Plan Period - Comments Received and CBMDC Response

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	<p>which has been recorded between 2013 and 2017. The NPPF requires Councils to significantly boost housing land supply and seeking to rebase the plan period to avoid the making up the under delivery is inappropriate and unsound. As a partial review of the plan the start date should therefore remain at 2013.</p> <p>The plan period should be 2013 to 2035.</p>	<p>minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply. (PPG Paragraph: 002 Reference ID: 2a-002-20190220, Revision date: 20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)</p>	
Plan Period	5. Extend Plan Period Further		
	<p>3a. Support the Council in extending the Plan period. However, given it is already 2019 the Plan won't be adopted until December 2021, the HBF would question if the period should be extended further to ensure that a 15-year period is retained from adoption as set in paragraph 22 of the NPPF.</p> <p>We would therefore suggest that the plan period is extended further to 2037 at the earliest. Should the</p>	<p>A wide range of comments were received in relation to the plan period. In reflection of the uncertainty that exists post plan submission the Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p>	<p>CSPR002 CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010</p>

Appendix 3: Plan Period - Comments Received and CBMDC Response

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	Council consider a longer period, similar to the existing 17 year Core Strategy plan period then the plan period could be extended to 2040.		CSPR011 CSPR012 CSPR013
	6. Retain Plan Period as adopted in Core Strategy		
	The Council is looking too far ahead, 2030 is a sufficient time period to make plans within	This approach is compliant with paragraph 22 of the NPPF which states that strategic policies in Local Plans should look ahead over a minimum 15-year period from plan's adoption.	CSPRQ006
	7. 5 Year Plan Reviews		
	4a. The proposal to extend the plan period from its current end date of 2030 to a new end date of 2035 so it has a 15-year life will mean that as a minimum the housing and employment figures will need to be updated accordingly and that will have an impact on Green Belt boundaries and sites for development. However, the base date for information will still fundamentally be the 2011 Census (the government household projection updates aside) as per the previous documents but making assumptions forward to 2035 on that data could have flaws, yet 2 further Censi will be undertaken during the plan period so future regular updates need to be in the policy update	Noted that data changes over time. As detailed in the NPPF strategic policies should look ahead over a minimum 15-year period from adoption, but it is also noted that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary (para 33). The preferred approach aims to strike the right balance between longer term strategic direction and the recognition that plans are now updated reasonably frequently to reflect changing circumstances.	CSPR016

Appendix 3: Plan Period - Comments Received and CBMDC Response

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	programme. This should also include the 5-year review of housing land and would also then be compatible with NPPF2018.		
	The new shopping area to be built where marks and spencer were is not adequate to meet the needs of the local population, it will not attract footfall as it does not have a "walkway" I strongly feel that this needs a covered (roofing) overhanging from existing or new buildings to allow people to walk from one place to the other, it needs linking with this to keep people under cover while they walk in bad weather. roads need to be considered or roads need to be made pedestrian right of way, the isolation of old sunwin house is an example of failure as its isolation with busy roads and no cover lead to its failure.	Comment noted. However, the comment is not relevant to the question.	CSPRQ040
	Obviously it needs to be supported with a forecast of government monies so allowing the council to plan raising the difference	Comment noted.	CSPRQ007
	There doesn't appear to be any plans for increasing the number of health professionals, i.e. GPs, nurses, hospital staff, dentists, which would be needed for that amount of increase. We don't have enough at present. It is foolhardy to say that all areas of Bradford will be heathy, as this plan does, without adequate investment in healthprofessionals now, as a matter of urgency. In addition the affordable housing suggested is a joke. What will happen is that the compny will get	Comment noted. However, the comment is not relevant to the question.	CSPRQ009

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	the contract, agree to do the affordable housing then, later on, they will be allowed to leave out the affordable housing, because of spurious reasons as happens now. Basically its a lie, it will not happen.		
	Please include the adoption of a engagement group working with Skipton and Pendle Councils to scope the future for the revision of the cross -border railway-line extending from Colne to Skipton. This can be achieved using the Northern Powerhouse Rail Initiative. thank you Please include a GUARANTEE that the protection of the Green Field sites will be honoured and upheld ; insofar that that no planning , unless for enhancement of the land (soft-landscaping) is carried out.	Comment noted. However, the comment is not relevant to the question.	CSPRQ010
	No evidence is presented to show that this would be an improvement. Several questions come to mind: Why the suggested change? What is the origin of this suggestion? Who does it suit? Who benefits? Is it a matter of bureaucratic convenience?	This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ014
	Given the delays and the rethink its important to move on the plan period.	Comment noted.	CSPRQ016
	bit of a joke if you can just get another one 6 years later if you don't like/agree with the current one	Comment noted.	CSPRQ020
	15 years is not far reaching enough 25 years would be more reasonable. Long term goals need to be set with flexible key stages between to allow for changes in	This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from	CSPRQ021

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	policies, constraints, economies and demands.	<p>adoption.</p> <p>Once adopted, the policies in the Core Strategy will be monitored through the production of an Authority Monitoring Report (AMR), which will be produced on annual basis. This will allow the Council assess whether there have been any changes in circumstances that may necessitate a review.</p> <p>It is also noted that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary (para 33).</p>	
	In the ongoing political instability, period should be shorter to allow flexibility when circumstances necessitate this.	As detailed in the NPPF strategic policies should look ahead over a minimum 15-year period from adoption, but it is also noted that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary (para 33).	CSPRQ022
	no more houses - till you have sorted the traffic situation in silsden - its a night mare just trying to get through the town on normal days	Comment noted. However, the comment is not relevant to the question.	CSPRQ023
	The plan needs to have provision that it can be revised should there be a consistent significant deviation from the projected statistics upon which the assumptions of	As detailed in the NPPF, local plans and spatial development strategies should be reviewed at least once every five years, and should then be	CSPRQ024

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	this plan are based.	updated as necessary (para 33).	
	It is far too long given the amount of information you have re population shifts and the lack of expertise in the Council.	Comment noted.	CSPRQ025
	2013 is 5-6 years old already need to speed things up not keep extending deadlines	Comment noted.	CSPRQ026
	It should remain at the minimum level to allow for flexibility	Comment noted.	CSPRQ028
	It is correct but more focus should be placed on earlier years	Comment noted.	CSPRQ032
	Will need to adjust it in line with whatever finance becomes available after the final Brexit deal.	Comment noted.	CSPRQ033
	At least there is a plan. No doubt it will need to be amended on first contact with reality, but there is a plan.	Comment noted.	CSPRQ034
	It seems a shame that a review is needed so soon, but I gather that is in large part as a result of revised housing targets from central government.	The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply. (PPG Paragraph: 002	CSPRQ035

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		Reference ID: 2a-002-20190220, Revision date: 20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)	
	The planning period appears a little to forward looking. Based on evidence from the original Core Strategy, it has come to light that many of the calculations are out of date and not in keeping with current needs and/or requirements. Most of the evidence used to evaluate housing numbers is empirical. We can see from an adjacent authority that they have realised that there's something wrong with their calculations, and have reduced their projections accordingly. Bradford are far behind the curve in this respect and need to adopt a more flexible view of what is realistically required.	In reflection of the uncertainty that exists post plan submission the Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption. As part of the supporting the Core Strategy Partial Review, the Council has commissioned a range of evidence to assess future development needs for the District, including housing numbers. This evidence will be published alongside the plan.	CSPRQ036
	Needs and requirements change over time and so a	Comment noted.	CSPRQ037

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	shorter time period allows for this to be formally considered		
	Please prioritise brown field & sustainable sites and not green field / belt areas. Improving public transport is essential in particular the public's ability to walk and cycle to work & school. Before further development is approved sites MUST be allocated for schools, recreation and transport links.	Comment noted. However, the comment is not relevant to the question.	CSPRQ039
	This is acceptable provided that there are regular reviews and updates which continue to use the latest data.	Comment noted.	CSPRQ051
	I understand that the governments original estimate for housing was too high and as such feel that there is a need to review and revise the overall district housing number	The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply. (PPG Paragraph: 002 Reference ID: 2a-002-20190220, Revision date: 20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied to take account of past under-delivery. The	CSPRQ055

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		standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)	
	Plan period should build in shorter term reviews in specific areas.	Local plans are already subject to a 5 year review option and can be updated / reviewed when there is a need.	CSPRQ056
	However National policy is only a recommendation 10 years would be more appropriate.	Local Plans need to be NPPF compliant which states they should be reviewed at least once every five years (para 33).	CSPRQ059
	Why not a rolling 3 or 5 year plan?	As detailed in the NPPF, local plans and spatial development strategies should be reviewed at least once every five years, and should then be updated as necessary (para 33).	CSPRQ061
	The Council should proceed with its current plan period rather than use the extension as a cause for delay.	<p>The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply.</p> <p>In reflection of the uncertainty that exists post plan submission the Council has extended the</p>	CSPRQ062

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		plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	
	A long term plan is easier to implement and would have a wider reach and strategy in planning instead of short term quick fixes. You can plan full short, medium and long term to last and serve our people of Bradford.	Comment noted.	CSPRQ063
	I agree that the Plan Period should be from 2020 to 2035, but only if this is based on "housing need" which has been properly re-calculated in line with the Government's revised formula, without retention of the previous figures calculated by Bradford MDC, which (according to the Local Plans Expert Group, report 2016) were over-estimated by more than 500 dwellings per annum (24%).	Comment noted.	CSPRQ067
	I am concerned that new thinking taking into account different ways we live now should be taken into consideration as soon as possible. For instance the way we shop and travel.	Comment noted. However, the comment is not relevant to the question.	CSPRQ069
	While I support the extended plan period on behalf of my clients it will be necessary to meet national policy requirements on Green Belt review contained in the NPPF -especially paragraphs 136 and 139 (c). Areas	A limited quantity of safeguarded land is identified in the CSPR Preferred Options.	CSPRQ070

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	of safeguarded land will need to be identified to meet these national policy requirements and to ensure that the Green Belt review is comprehensive and does not need to be repeated in subsequent 5 year plan revisions. This requirement is necessary to meet the full residential and employment land needs of the District.		
	I am concerned that the adoption of this new time scale fails to reflect developments that have already occurred, and which would have contributed to the proposed housing targets	The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply.	CSPRQ074
	The planning period should start immediately the plan is finalised. The timescale, to 2035 is too long. Who knows what will change in that timescale?	The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ081
	I applaude to the proposal of new plans however I object to the use of urban green space sites to be used for developments. The communities in Bradford need these breathing spaces to promote community and family enrichments which support the ideology of our society. Use of urban green space such as ne128 (Comment noted. However, the comment is not relevant to the question.	CSPRQ083

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	<p>idle moor) will contribute to overcrowding and stretch existing resources such and road , schools dentist and gp surgeries who are already struggle to cope with the added demands of cote farm and apperley bridge developments . Looking at this site the land is poor being quarry that has been infilled and access to the site if quite frankly dangerous give 3 90% turns to gain access amongst family houses. finally this site is a wildlife corridor, hosting foxes and deer and birds including woodpeckers bullfinch, sparrowhawk/ peregrin and red kites have been seen scouting.</p>		
	<p>Why not build on Brown sites ...or maybe make another village /town...</p>	<p>Comment noted. However, the comment is not relevant to the question.</p>	<p>CSPRQ084</p>
	<p>You must ensure a primary and secondary school are included in these plans. Also you must ensure sufficient recreational facilities are provided. The car parking space at Apperley Bridge station must be doubled and you must review and improve the current infrastructure. Not doing so will reduce the quality of life of current and new home owners</p>	<p>Comment noted. However, the comment is not relevant to the question.</p>	<p>CSPRQ089</p>
	<p>There will be no green space and recreation space left on Idle moor for walking, playing, walking dogs etc. The one access road via Green Lane is also innappropriate for the amount of houses up here including a busy nursery. There is also no playground provided for the residents of all the houses up and off Green lane. It would be a shame to add more houses</p>	<p>Comment noted. However, the comment is not relevant to the question.</p>	<p>CSPRQ094</p>

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	<p>onto Idle moor decreases the green belt space between Idle and Wrose. And leaving no public access fields for walking and recreation purposes. Schools and nurseries in the area are also already over subscribed and the roads are so busy as it is.</p>		
	<p>I would like to object to the proposed site allocation that uses Greenfield land at the side of the Leeds Liverpool canal. I ma talking specifically about site references NE/065, NE/141, NE/069. I believe changing the use of this land to residential development would have a serious impact on wildlife as well as a social impact. Many people use the canal to get a taste of the countryside without the need to hop in a car and travel therefore using this greenspace would be counter productive to the environment causing more pollution and congestion with cars travelling further afield. Please do not give up this precious green space. There are plenty of brownfield sites that can be used to avoid this. Thanks</p>	<p>Comment noted. However, the comment is not relevant to the question.</p>	<p>CSPRQ096</p>
	<p>The plan period should NOT be extended without extensive analysis of all the figures in it with respect to the period of the extension.</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p>	<p>CSPRQ097</p>
	<p>Agree that policies need to be reviewed, but shouldn't mean that this should be used as a reason for whole</p>	<p>Comment noted. However, the comment is not</p>	<p>CSPRQ098</p>

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	sale change of designated areas for residential development. Urban Green spaces need to be respected and maintained, and not given over the development.	relevant to the question.	
	Given that the plan is unlikely to be adopted until 2021 at the earliest, to ensure that the new plan period has a minimum of 15 years as advised in the NPPF, we would suggest extending the plan period to 2036.	The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ099
	Forward planning is something that has been lacking in Bradford for decades.	Comment noted.	CSPRQ100
	If the plan period is extended to 2035, it is essential that this is not used as an excuse to delay essential decisions, especially related to the need to tackle climate change urgently	The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ106
	We accept that national planning policy says that the end date of the Plan should be 2035 but we are unclear why the start date of 2013 cannot be retained thus meaning that the plan period is 22 years.	The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply. (PPG Paragraph: 002	CSPRQ107

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		Reference ID: 2a-002-20190220, Revision date: 20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)	
	Insufficient information currently available to support an extension, namely SHLAA, Flood Risk Assessment SFRA, and other documents identified in the review not being currently up to date and still appear to be work in progress.	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply. (PPG Paragraph: 002 Reference ID: 2a-002-20190220, Revision date:</p>	CSPRQ108

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		20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)	
	using the original period to 2030 is adequate. That is still 11 years of building sites all across the region.	The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ109
	The plan start should be deferred from 2020 if all the evidence, on which the review is to be based, has not been gathered	The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPRQ110
	Question - we acknowledge that reviews of local plans are required every 5 years, but is it really necessary to extend the end-date of the plan by a further 5 years?	The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is	CSPRQ115

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	<p>As such, when would a new plan become appropriate? Interestingly, if the end-date of 2030 was retained and the standard methodology applied, the current new dwellings target of 42,100 would be reduced to around 28,000+, ie potentially obviating the need for any green belt being used!</p>	<p>compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p>	
	<p>However, it was not explained very clearly why there is a need to extend the plan period. It would appear that the reason is to better match the evidence base projection periods. If that is the case then I recommend that the plan remain very flexible with timely reviews and updates, as a lot could change in 15 years, especially with the uncertainty of Brexit, and the evidence base can also change significantly and needs to be kept up-to-date. When the evidence base is updated/improved then the local plan also needs to change/evolve to remain relevant.</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>Once adopted, the policies in the Core Strategy will be monitored through the production of an Authority Monitoring Report (AMR), which will be produced on annual basis. This will allow the Council assess whether there have been any changes in circumstances that may necessitate a review.</p> <p>It is also noted that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary (NPPF paragraph 33).</p>	<p>CSPRQ116</p>
	<p>The plan should however have a significant and meaningful reviewed every five years or sooner if</p>	<p>Comment noted.</p>	<p>CSPRQ117</p>

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	certain specified parameters/forecasts vary significantly e.g. population growth, housing demand, economic conditions, environmental impacts		
	<p>Paragraph 22 of the Framework is explicit stating that strategic policies in the development plan should look ahead for a minimum 15 year period from adoption.to anticipate and respond to long term requirements and opportunities. This is particularly so where a review of the Green Belt may be necessary having regard to the intended permanence (in the long term) of Green Belt boundaries.</p> <p>Presently the Council suggests a fifteen year period from 2020 through to 2035, thus assuming adoption during 2020. This is at odds with the material contained in the Partial Review Scoping Report at Table 4.1 (page 39), which suggests adoption (Regulation 26) in December 2021,</p> <p>Our view is that the Council should seek to Plan to a period of 2037 (at least) given that adoption of the Site Allocation element may take longer than two years (as Green belt review is involved). Simply, it would be appropriate for the Council to roll the current Core Strategy period (of seventeen years) forward.</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p>	CSPR017
	<p>The current Core Strategy plan runs until 2030, however national policy indicates that the plan should look ahead over a 15-year period. The Council have proposed that the new Core Strategy plan period should be extended from 2030 to 2035. It is unclear</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead</p>	CSPR018

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	<p>whether the base date of the plan is intended to remain at 2013 or be moved. This requires clarity and justification. If the latter is the case the Council will need to consider if this has any implications for any policy which is not the subject of the CSPR.</p> <p>The intention to extend the plan period is supported, however, the current period to 2035 should be further extended until at least 2037 to ensure it is sound.</p> <p>The NPPF, paragraph 22, states that strategic policies "...should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure". Paragraph 20 of the NPPF is clear that strategic policies include those for housing, employment, retail and other commercial development.</p> <p>Whilst Table 1 of the 'Scoping Report' suggests that the CSPR will be adopted in 2020. This is contradicted by Table 4.1 of the same document which identifies anticipated submission in 2020 and adoption by December 2021. The latter is considered a more realistic timeframe given the remaining stages of plan-making and the evidence required to support the CSPR. Therefore, the current plan period will only provide a maximum 14 years post adoption. This presumes that there is no slippage in the timetable. It is recommended that to ensure the plan is consistent with the NPPF and provide scope for a degree of delay the plan period be extended until at least 2037.</p> <p>The further extension of the plan period will have</p>	<p>over a minimum 15-year period from adoption.</p>	

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	<p>consequential impacts upon the housing requirement and need for allocations which should be factored into the CSPR and its associated evidence base, including the proposed update to the Strategic Housing Market Assessment (SHMA).</p>		
	<p>It is noted that the plan period in the adopted Core Strategy runs from 2013 to 2030 and as Table 1 of the Scoping Report highlights, paragraph 22 of the NPPF advises that strategic policies should look ahead over a minimum 15-year period from adoption (our emphasis). On this basis it is agreed that there is a clear need to extend the plan period. Whilst it is agreed that the plan period should be extended, we nonetheless consider that this should be until at least 2037, rather than 2035 as proposed within the Scoping Report. Table 1 of the Scoping Report indicates that the 2035 figure has been chosen on the basis of an "anticipated date of adoption in 2020". This stated date for adoption, however, contradicts other parts of the same document. In particular Table 4.1 at page 39 of the Scoping Report, which provides a more detailed breakdown of the key stages for the preparation of the Partial Review, indicates that adoption of the plan is not anticipated until December 2021. Indeed, we note that this timetable largely replicates that indicated in the updated Local Development Scheme published in July 2018, which also suggests adoption of the plan in December 2021. The Local Development Scheme</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>The Local Development Scheme will be kept under review and updated, as appropriate.</p> <p>The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply. (PPG Paragraph: 002 Reference ID: 2a-002-20190220, Revision date: 20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied</p>	<p>CSPR021</p>

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	<p>further indicated that consultation on this current scoping document was due to commence in November 2018, and has therefore already been subject to a two month slippage. It is our understanding from discussions with Officers that it is highly unlikely that the Preferred Option Draft will be published in May 2019 as the timetable presently suggests.</p> <p>Taking account of this slippage and the potential for further delays, we consider that it is highly unlikely that adoption of the plan will occur before 2022. It therefore follows that the plan period should run until at least 2037 (i.e. a minimum of 15 years from adoption).</p> <p>It is further considered that the starting date for the plan period should be brought forward to the commencement of the preparation of the document, rather than it commencing in 2020 as is presently proposed. In rolling the plan period forward from the base year position of the adopted Core Strategy, it is therefore essential that the replacement document seeks to accommodate any unmet housing need during the period of the adopted Core Strategy (i.e. from 2013 at the existing Core Strategy level of requirement). As Table 1 demonstrates below, in every year since that time the level of housing delivery has failed to accommodate the adopted Core Strategy requirement and it is therefore essential that this deficit in delivery is factored in to any future district-wide housing requirement. This deficit in delivery is set out</p>	<p>to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)</p>	

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	<p>below [see rep/comment box for table]. Whilst under-delivery against the adopted Core Strategy requirement has been significant, chronic and acute, this is considered to be largely due to the absence of an adopted Land Allocations Plan thus failing to provide an adequate supply of deliverable sites, rather than the capacity of the District to accommodate and sustain such a level of housebuilding (as was established through the examination of the Core Strategy). In summary the Core Strategy Review plan period should start at the commencement of the process (2018) until at least 2037 (based on a likely adoption date of 2022) and should also plan for accommodating the under delivery of housing that has occurred since the commencement of the current plan period (2013).</p>		
	<p>We agree that extending the end date to 2035 is sensible, as the updated evidence base for housing and employment will use projections up to that date. However, as this is a partial review of the Core Strategy only, we consider that the start of the plan period should, without doubt, remain at the 2013 date.</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which</p>	<p>CSPR023</p>

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		addressed projected household growth and historic under-supply. (PPG Paragraph: 002 Reference ID: 2a-002-20190220, Revision date: 20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)	
	<p>The scoping report does not indicate how much of uplift over the MHCLG standard methodology will be proposed on the basis of additional job growth. Bearing in mind that the MHCLG figure naturally includes job growth that is within the historical trend, any uplift would need to be justified on the basis of policy intervention. The Leeds City Region SEP job growth aspirations were up to 2024, so clearly new evidence will be needed for the plan period.</p> <p>In 2015 CPRE took the view that 1,790 dpa would be a sound requirement (34,000 for 2013-30), of which 597pa should be affordables (based on the SHMA). Our own methodology was not dissimilar to MHCLG's,</p>	Comment noted. However, the comment is not relevant to the question.	CSPR024

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	<p>aside from our view that the affordable component should be segmented out of the total requirement. That is to say, if the total requirement was 1,700, providing 2,000 homes per year but only 200 affordables would not be meeting need, whereas providing 600 affordable homes and 1,100 market homes would be meeting need.</p> <p>As the household projections have come down in 2014 and 2016, we would expect the requirement to be lower than in the current Core Strategy. The MHCLG methodology indicates 1,663 pa 2016-2026: projecting that forward to 2035 gives 31,597, which suggests that the requirement would be of a scale we could support. However, without knowing the job growth-related uplift that will be proposed, and the rationale for that, we cannot take a definitive position.</p>		
	<p>We support the extension of the plan period, but as this is a partial review of an adopted Core Strategy it is essential the review duly takes account of development that has taken place in the period 2013-2020, both in relation to completions assessed against the housing requirement and the distribution of those completions assessed against the settlement hierarchy. With a new plan period start date there is a concern that previous under-delivery against the housing requirement and to individual settlements will not be addressed and an un-met need will remain. Any change to the plan period should duly reflect and</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with paragraph 22 of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>The plan period needs to be forward focused not heavily structured on the past. Policies also need to be kept under review, up to date and relevant. Working to the Government's Standard Method uses a formula to identify the minimum number of</p>	<p>CSPR029</p>

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	address delivery and distribution issues that have resulted in the period 2013-2020.	homes expected to be planned for, in a way which addressed projected household growth and historic under-supply. (PPG Paragraph: 002 Reference ID: 2a-002-20190220, Revision date: 20 02 2019). The affordability adjustment in the Standard Method is applied in order to ensure that local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. More specifically, the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. (PPG Paragraph: 011 Reference ID: 2a-011-20190220, Revision date: 20 02 2019)	
	There are too many outstanding reports to be able to decide whether now is the right time to extend the plan period to 2035.	Comment noted.	CSPR030
	Notwithstanding our overarching comments regarding the principle of undertaking the CSR at this stage, we provide our comments on the proposed scope of the CSR below. It is noted that the new plan will run for a period of 15 years from adoption and as such the Council are seeking to extend it from 2030 to 2035. However, in the Council's most recently published local development scheme, it states that the CSR is unlikely	The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.	CSPR032

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	to be adopted until 2021, and as such we would advise that the plan period should be until 2036.		
	<p>Notwithstanding our overarching comments regarding the principle of undertaking the CSR at this stage, we provide our comments on the proposed scope of the CSR below.</p> <p>It is noted that the new plan will run for a period of 15 years from adoption and as such the Council are seeking to extend it from 2030 to 2035. However, in the Council's most recently published local development scheme, it states that the CSR is unlikely to be adopted until 2021, and as such we would advise that the plan period should be until 2036.</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p>	CSPR033
	<p>We support the extension of the Plan period in the reviewed plan and believe this would be in accordance with national guidance.</p>	<p>Comment noted.</p>	CSPR035
	<p>Paragraph 22 of the NPPF states, strategic policies should look ahead over a minimum 15- year period from adoption. The Council's latest Local Development Scheme, dated July 2018, envisages this Core Strategy Partial Review to be adopted in December 2021, which would mean from adoption the Core Strategy would only look ahead for a period of 13 years; short of the minimum period of 15 years set out in national planning policy.</p> <p>The logical approach would be to extend the Plan period to 20 years, so from 2020 to 2040, meaning</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p> <p>The Local Development Scheme will be kept under review and updated, as appropriate.</p>	CSPR036

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	that on adoption in December 2021, the Plan would look ahead for some 18 years.		
	<p>Notwithstanding our overarching comments regarding the principle of undertaking the CSR at this stage, we provide our comments on the proposed scope of the CSR below.</p> <p>It is noted that the new plan will run for a period of 15 years from adoption and as such the Council are seeking to extend it from 2030 to 2035. However, in the Council's most recently published local development scheme, it states that the CSR is unlikely to be adopted until 2021, and as such we would advise that the plan period should be until 2036 in order to ensure a fifteen year period as advised by national policy.</p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p>	CSPR037
	<p>The adopted Core Strategy (2017) currently runs from 2013 and covers the 17 -year period to 2030. As part of the Core Strategy Review, it is proposed that the plan period would be extended up to 2035, 15 years from anticipated adoption in 2020.</p> <p>Keepmoat Homes support extending the plan period to 2035, and we consider this to be consistent with paragraph 22 of the NPPF which states that "<i>strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in</i></p>	<p>The Council has extended the plan period to 2037 with a start date for the plan of 2020 and a cautious adoption date of 2022. This approach is compliant with para 22. of the NPPF which states that strategic policies should look ahead over a minimum 15-year period from adoption.</p>	CSPR044

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	<i>infrastructure</i> ".		

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Policy HO1	1. General Comments		
	1a. General comment that the housing requirement should be lower	The council will review the adopted Core Strategy housing requirement in line with national planning policy requirements and the latest housing and economic evidence.	CSPRQ054 CSPRQ055
	1b. New housing will provide a major stimulus to the district.	Comment noted.	CSPR038
	1c. Will the council also use the current population housing ratio for the district of 2.58 people per household as demonstrated by paragraph 5.2 of the Health and Well-being Profile based on the Intelligence Bulletin of June 2018 to calculate future housing need? If applied to population growth to 2035 this would mean an additional 5,233 homes are needed i.e. 5,233 divided by 17 = just over 307 homes per annum? 6. Will it also take account of the findings of the Office for National Statistics regarding economic growth and EU migration since the Brexit referendum? Please refer to your Intelligence Bulletin of 5/7/18 which showed over 1000 more migrants left the district.	The council intend to undertake a Local housing needs assessment using the standard method as set out in the NPPF and PPG. At present this states using the ONS 2014 based household projects to inform the baseline housing need calculation. The council will consider latest evidence on local demographics and economic growth in the updated evidence base when assessing the housing requirement.	CSPR039

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	1d. Needs to fit local need	The council intend to undertake a Local housing needs assessment using the standard method as set out in the NPPF and PPG.	CSPRQ003
	1e. I'm sure the local housing authorities surveys are more accurate than anything government or LA can guess at ! Listen to charities and housing associations!	Noted. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance. The latest SHMA will include a new household survey and engagement with key stakeholders including housing associations.	CSPRQ006
	1f. While the new calculations suggest less housing there is an ongoing urgent need for more affordable housing and other solutions to the impending crisis created by people renting into retirement. Social housing has to be the main priority	Noted. The approach to hosing mix and affordable housing are set out in policies HO8 and Ho11 of the CSPR. Affordable housing needwill be assessed separately to the baseline local housing need calculation.	CSPRQ007
	1g. The intense environmental, social and cultural deficit created by such arithmetic plans is bad for the locality. Different sets of plans contradict each other ... for example, plans to offset the effects of global warming and plans that destroy agricultural land and green areas. Moreover, too often "minimum" housing requirements, etc, are based on assumptions based on incomplete evidence and are, too often, ideologically driven.	<p>The NPPF is clear the council should undertake a local housing need assessment using the standard method set out in the PPG for calculating the minimum number of homes needed.</p> <p>The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met</p>	CSPRQ014

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		over the plan period. This will include strategic constraints to delivery. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits	
	1h. I think it is right that this policy needs reviewing and it is also right that a review on the type of land that is currently set in the adopted plan with a view to changing it; such as removal!	Comment noted	CSPRQ021
	1i. The latest evidence shows that the population is declining. At what point is this going to be taken into consideration? Why will politicians not address the elephant in the room and solve many of the problems and targets by developing policies and strategies to cut the population. why should tax payers pay people to have children? There would be no need to destroy the green belt with more housing if there was no demand, a totally false demand caused by over population, property speculators and vested interests in the building trade. Reduction in pollution would be achieved. Energy needs would be reduced. There would be a balance between the needs of nature and the human population more conducive to nature. There would be no need for increased house	The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance. This will be based on ONS 2014 based household projections in line with the current PPG. The approach suggested is therefore not considered in line with national planning policy,	CSPRQ024

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	building if existing sites had to be developed within a given time frame.		
	1j. The current plan is utterly ridiculous and has been proven to be. In addition when has Bradford ever built this number of new homes? You have misled the electorate and, as a consequence, developers have had a field day.	It is considered that National planning policy has changed since the adoption of the Core Strategy with the revised NPPF (2019). NPPF para 33 states reviews should take into account changing circumstances affecting the area, or any relevant changes in national policy. In addition NPPF para 212 states plans may also need to be revised to reflect policy changes which the replacement NPPF has made. The CSCR will consider the latest most up to date evidence on housing and economic growth in reviewing Policy HO1 in line with national policy. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery	CSPRQ025
	1k. The number of homes required is not correct and over estimated vastly. More social housing is needed, not so called affordable homes but social housing	The CSCR will consider the latest most up to date evidence on housing and economic growth in reviewing Policy HO1 in line with national policy. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using	CSPRQ028

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		the standard method in national planning guidance. This will be based on ONS 2014 based household projections in line with the current PPG. Affordable housing needs will be considered through the latest SHMA and policy Ho11 of the CSPR.	
	1l. The council should use the best method available to work out how much housing is needed, but also apply common sense - the last set of figures were so huge that it was obvious they were incorrect. Then common sense needs to be applied about where the new housing should be.	Noted. The CSPR will consider the latest most up to date evidence on housing and economic growth in reviewing Policy HO1 in line with national policy. The housing distribution is considered in CSPR Policy HO3.	CSPRQ041 CSPRQ056
	1m. The city is overloaded with "homeless" beggars and most of them are not homeless. Own up about how many council / housing association properties are not occupied. Stop approving greenfield developments when there are dozens of brownfield sites for development. Stop allowing the conversion of beautiful (but derelict) buildings into slums by allowing far too many rabbit-hutch bedsits to be installed.	Comment not considered relevant to policy Ho1.	CSPRQ033
	1n. There is no doubt whatsoever that Bradford will maximise every opportunity to build more houses where and when they can.	Noted. to support the government's objective of significantly boosting the supply of homes the NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the	CSPRQ038

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		minimum number of homes needed. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance	
	1o. The Districts Housing requirement should homes that could be created from unused commercial properties as well as looking at where people come from to buy new properties. For example almost all of the people who moved into properties in Apperley Bridge moved from Leeds and did not help people from Bradford to find a home.	Noted. The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance	CSPRQ038
	1p. The use of precise figures is amateurish. Stick to a maximum of 30,000 over 15 years if any is really needed	The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance	CSPRQ059
	1q. Is the housing requirement (equivalent per year 2,477) currently being delivered? If not should the H01 housing requirement period change to 2020-2035?	The housing requirement in Policy Ho1 will be aligned to the plan period.	CSPRQ060

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	<p>1r. The governments 'standard methodology' is a minimum, and should be adjusted to suit local circumstances and should also provide sufficient flexibility to meet the need, especially considering the more stringent definition of deliverability, therefore the current requirement is likely to be relevant.</p>	<p>Noted. The C SPR will consider the latest most up to date evidence on housing and economic growth in reviewing Policy HO1 in line with national policy</p>	<p>CSPRQ062</p>
	<p>1s Consideration of why there is demand for housing in a certain area should also be taken into consideration. Just because demand is high in a desirable area does not mean that supply should be increased. The high demand is a factor in sustaining the very local house prices and the economy of that area.</p>	<p>The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance. This is based on projected household growth at a district level and does not therefore consider local market demand.</p>	<p>CSPRQ065</p>
	<p>1t. Using the Standard Method Housing Need methodology , as at January 2019, Bradford has a need for 1,697 Dwellings per Annum (DPA) compared with Bradford Council's assessment of a requirement for 2,477 DPA. On that revised basis, Bradford District would have an adjusted "housing need" of no more than 25,455 new dwellings over the Plan Period of 15 years to 2035. The distribution of this total, between</p>	<p>Noted. Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance. This will be projected over the plan period. The council will be considering evidence in relation to the justification or any uplift based on the requirements as set out in the PPG. housing distribution will be considered through Policy Ho3 f the C SPR</p>	<p>CSPRQ067</p>

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	settlements and the inner city should also be carefully considered, and not simply applied as a means of "spreading the grief".		
	1u. The long term housing needs will also be affected by the One Yorkshire devolution bid, which if administrated as proposed will alter housing needs as the population grows	Noted. The council will review the adopted Core Strategy housing requirement in line with national planning policy requirements and the latest housing and economic evidence. It is not considered appropriate or feasible to factor in the One Yorkshire devolution bid at this stage.	CSPRQ080
	1v. It is all well and good to have a housing requirement plan but I personally cannot see how we need that number of new houses in the district, nor do I understand how the number of houses needed can increase all the time when the size of the land stays the same!	The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery such as infrastructure. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits	CSPRQ091

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	<p>1w. The current figure of 42,100 new homes (2,477 per annum) is, and was, an overestimate of the District's housing requirement to 2030. This point was made by our Association, and by many other parties, at the Examination of the Core Strategy hearings, as well as by many councillors when the Revised Core Strategy was adopted by the council. We have particular regard to the evidence set out at paragraph 5.2 of the "Health and Well-being Profile of Bradford", based on the CoBMDC Intelligence Bulletin of 5 June 2018 which shows that the population has been growing at a slower rate than the national average since 2012, that a population increase of 8,200 is projected to mid 2026 and of 17,500 taken through to 2041, six years beyond the Review Period. This is an average of 1,025 people per annum over the eight years to 2026 and 620 people per annum thereafter. Thus the projected growth figure to 2035 is 13,780 or thereabouts. (The Sustainability Appraisal at paragraph 5.10 puts it at the lower figure of 13,500). Paragraph 5.2 HWPB also demonstrates that the current ratio of population to households is 2.58. If that ratio is applied to the projected population growth to 2035 an additional 5,341 homes would be required (314 homes per annum). The Office for National Statistics, whose figures</p>	<p>Noted. The council will review the adopted Core Strategy housing requirement in line with national planning policy requirements and the latest housing and economic evidence. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance. In assessing the housing requirement the council will consider the matters raised including local demographic factors .</p>	<p>CSPRQ114</p>

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	<p>are used by the June Bulletin, points out that these do not take account of future government policies, changing economic circumstances or other factors affecting demographic behaviour.</p>		
	<p>1x. The housing delivery figure for the first period of the Core Strategy (2013-18) was just 1,255pa, ie a 50% shortfall on the annual requirement of 2,477pa. Further, the number of new dwellings delivered in the preceding RUDP period was around the same level at 1,195 new dwellings pa. These figures strongly suggest that any uplift to the government's standard methodology calculation of 1,663 new dwellings pa is likely to be unrealistic and create unnecessary pressures on green belt - this amplified, of course, if there is any proposal to retain the current aspiration of 2,477 new homes pa.</p>	<p>Noted. The council agree that the Local plan should be deliverable. However it should be noted that the Core Strategy targets were reliant on the release of land through the allocations DPD including, greenfield and greenbelt sites. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits</p>	<p>CSPRQ115</p>
	<p>1y. The original target makes no sense when you look at market conditions. Prices in Bradford fell in real terms between 2010 and 2018. Whilst home owners across England saw an average increase in the value of their homes of 40%; price rises in Bradford were limited to 8%. That is roughly a</p>	<p>Noted. The council will review the adopted Core Strategy housing requirement in line with national planning policy requirements and the latest housing and economic evidence.. The revised housing requirement figure will be evidence based and show the</p>	<p>CSPRQ117</p>

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	<p>third of the rate of inflation. As a result of this stagnation, the value of our homes has fallen from almost 30% below the national average to more than 45% below the national average. This is substantiated by a recent Lloyds Bank study which confirmed that Bradford has the lowest income to house price ratio of any city in England. This has the effect of trapping people in the city and limits opportunities for growth as relative wealth is suppressed compared to other areas. You also need to consider the impact of a massive building spree on the existing nature of the city and the well being of existing residents. We have the second lowest level of green space in the city of any of the big ten cities. The policy needs to protect this against the presumption in favour of sustainable development.</p>	<p>extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits</p>	
	<p>2. Housing and Economic Growth Uplift</p>		
	<p>2a. A crucial aspect of the Core Strategy was to support and encourage economic growth in the District, which in turn requires the delivery of an adequate supply of new homes. That is unlikely to equate to the standardised methodology's minimum output.</p>	<p>Noted. The council will review the adopted Core Strategy housing requirement in line with national planning policy requirements and the latest housing and economic evidence.</p>	<p>CSPR001 CSPR021 CSPR032 CSPR033 CSPR034 CSPR035</p>
	<p>2b. Support using the Standard Method as the minimum starting point for the housing requirement and need to consider whether it</p>	<p>Noted. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard</p>	<p>CSPR005 CSPR006 CSPR007</p>

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	appropriately reflects the affordable housing needs, households who may want to form new households and the economic growth of the area and planned infrastructure requirements	method in national planning guidance. In assessing the housing requirement the council will consider the matters raised.	CSPR008 CSPR009 CSPR010 CSPR011 CSPR012 CSPR013 CSPR021 CSPR028 CSPR029 CSPR034 CSPR036 CSPR041 CSPR043 CSPR044 CSPRQ048 CSPRQ099
	2c. Should recognise the link between housing and economic growth and link to evidence in the District's Economic Strategy and LEP Growth Strategy and cross reference between Policy HO1 and Policy EC1	The council recognise the link between housing and economic growth and will consider this through the evidence updates to the SHMA and ELR and review of the housing requirement of Policy HO1.	CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR012 CSPR013 CSPR021
	2d. Analysis demonstrates that when based on	Noted. The council recognise the link	CSPR0021

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	<p>the job creation targets of the Economic Strategy the housing requirement figure should be increased from the (current consultation draft) standard to a range between 2,100dpa - 2,200dpa. the upper end of this range reflects the housing requirement that informed the adopted Core Strategy, before an adjustment was made for backlog.</p> <p>Applying this annual requirement range (2,100-2,200) over a plan period of 2018 – 2037 would result in an overall requirement of 39,900 – 41,800 dwellings.</p> <p>This is before any deficit since the start of the current plan period. Accounting for addressing this backlog would increase the overall requirement over the plan period to range between 44,445 - 46,345 dwellings.</p> <p>To plan for a lower housing requirement would significantly compromise the Council in its ability to deliver on the aspirations and targets in its economic strategy. Whilst such a level of housing would be aspirational, it has been demonstrated through the recent examination of the adopted Core Strategy that such a level of housing is appropriate in the context of available and deliverable land supply.</p>	<p>between housing and economic growth and will consider this through the evidence updates to the SHMA and ELR and review of the housing requirement of Policy HO1The council will consider evidence in relation to the justification or any uplift based on the requirements as set out in the PPG. In line with the PPG it is considered that there is no requirement for addressing the backlog in the standard method as set out in PPG.</p>	
	<p>2e. Given that plan was adopted as recently 2017 there is no evidential basis for the Council to</p>	<p>It is considered that National planning policy has changed since the adoption of the Core</p>	<p>CSPR032 CSPR033</p>

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	<p>downgrade their economic aspirations. Whilst the baseline projections may have altered there is no evidence or reason for the Council to apply no economic uplift or a reduced uplift to that considered necessary in 2018.</p>	<p>Strategy with the revised NPPF (2019). NPPF para 33 states reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. In addition NPPF para 212 states plans may also need to be revised to reflect policy changes which the replacement NPPF has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan. The CSPR will consider the latest most up to date evidence on housing and economic growth in reviewing Policy HO1 in line with national policy.</p>	<p>CSPR035</p>
	<p>2f. The Council should pay regard to the SHMA and ELR findings in its consideration of its housing requirement, noting its previous acceptance that factors including economic growth play a key part in finalising the minimum housing requirement number.</p>	<p>Noted. The council agree the evidence in the latest SHMA and ELR will need to be considered in reviewing Policy HO1.</p>	<p>CSPR001 CSPR021 CSPR043</p>
	<p>2g. Government figure do evolve as time passes and there's a real need to keep pace with changes. However, government statistics are based on the UK as a whole and Bradford has not</p>	<p>Noted. The CSPR will consider the latest and most up to date evidence on housing and economic growth including the SHLAA, SHMA and employment land review in</p>	<p>CSPRQ036</p>

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	<p>seen a broad scale creation of employment opportunities. Much of the districts housing needs; particularly in remote suburbs, stem from the fact that many people migrate into Leeds for job opportunities. The simple question to ask here is, 'what are Council doing to promote, attract and retain business within the district?' Small business is not the way forward, it's larger employment opportunities which are required. The second issue affecting housing is the categorisation of brown-field as Category B, which effectively rules out development on these site which have historically supported manufacturing. The world has changed and the UK no longer has a large manufacturing base, it's a service based economy. If this land was released for housing and offices, then there's an opportunity for growth of service industries. Service industries, traditionally provide better paid employment opportunity which is precisely what's needed in the district.</p>	<p>reviewing Policy HO1 in line with national policy. The approach to allocating housing and employment sites will be set out in the Allocations DPD.</p>	
	<p>2h. if potential economic growth is used to justify increasing the housing delivery target above the baseline set using the 'standard methodology' the Council is realistic in its assumptions about that growth (eg it should be linked to realistic expectations and well progressed plans regarding inward investment rather than a 'hope' of inward</p>	<p>Comment noted. The CSPR will consider the latest and most up to date evidence on housing and economic growth including the SHLAA, SHMA and employment land review in reviewing Policy HO1 in line with national policy. The council will consider evidence in relation to the justification or any uplift based</p>	<p>CSPRQ111</p>

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	<p>investment.) 2 That if potential economic growth is used to justify increasing the housing delivery target the release of land for housing and other development is phased to align with the expected economic benefits (eg jobs) that would be created by the investment and that greenfield sites should be scheduled for later phases. It would be problematic if, in the expectation of an economic boost an excess of land was made available for development in less sustainable locations or environmentally sensitive locations and then the investment failed to materialise. This could artificially skew development to highly profitable greenfield sites leaving brownfield sites derelict. .3 That if potential economic growth is used to justify higher housing delivery any site or settlement viability assessments (particularly assessments of brownfield urban sites) should reflect the expectation that economic growth will have a positive impact on viability rendering it more likely that brownfield sites will be commercially viable and more likely to be developed for housing. It is not appropriate to assume that economic growth will simply boost the population/household numbers without also boosting the urban housing market. Any housing land supply assessment should reflect the fact</p>	<p>on the requirements as set out in the PPG.</p> <p>The approach to phasing and managing the release of land will be considered through Policy HO4 of the CSPR.</p> <p>The council will consider local market evidence in undertaking the whole plan viability assessment.</p>	

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	that additional urban sites would likely come to market in an economic boom.		
	<p>2i. With regard to changing economic circumstances, the June Bulletin figures are based at 30 June 2016, a few days after the Brexit Referendum, and it is fair to point out that since the Referendum GDP has grown substantially less than previous Treasury forecasts, the Bank of England has just revised its growth forecast to an even lower figure, and that although the final form of Brexit is currently unknown, none of the generally respected economic forecasters are currently suggesting anything other than sluggish growth in the short to medium term.</p> <p>Latest figures also suggest that net migration from the EU, which has historically contributed to Bradford's population growth, is now materially lower than pre-Referendum, and that unless the Brexit process is halted there will be little net EU migration going forward. This trend is supported by the CoBMDC Intelligence Bulletin of 5 July 2018 ("the July Bulletin") which shows that in 2017 over 1000 more migrants left the District than came and that applications for NI numbers from Polish nationals decreased by over one third and from Romanians the decrease was 30%.</p> <p>Paragraph 6.1 of the Sustainability Appraisal (based on pre-Referendum statistics), should be</p>	<p>Comment noted. In line with NPPF paragraph 60 Policy HO1 will be informed by a local housing need assessment conducted using the standard method in national planning guidance. The C SPR will consider the latest and most up to date evidence on housing and economic growth including the SHLAA, SHMA and employment land review in reviewing Policy HO1 in line with national policy. The council will consider evidence in relation to the justification or any uplift based on the requirements as set out in the PPG.</p>	<p>CSPRQ114</p>

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	<p>read accordingly, as it fails to note the very substantial nature of the drop in the rate of population growth and, in contrast with the July Bulletin, states that "projections for international migration continue to show more people coming to Bradford from overseas than emigrating".</p> <p>The Sustainability Appraisal indicates that Bradford's levels of unemployment are above average, with those citizens in work earning less than national average earnings. A higher proportion than national average are in low skill work. There is therefore a great deal of opportunity to increase economic growth in Bradford. Much growth will arise through increasing the number of jobs and average earnings, by bringing unwaged citizens into employment and through improved education and training to increase skill levels. Not until that has been achieved would there be any significant impact on housing need. (We comment below on the need for 100 hectares of employment land.)</p> <p>We agree that the Government's current standard methodology should be the opening point for calculating the Bradford Housing Requirement. This currently produces a figure of 1,663 dwellings per annum, which is more than FIVE TIMES HIGHER than the number required simply to meet predicted population growth in the District. The</p>		

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	<p>fact that the government figures provide such a significant level of slack should be a primary consideration when reviewing the Housing Requirement figures.</p> <p>The clear conclusion to be drawn is that the government methodology produces figures for Bradford which are still well above housing need based on population growth and that they provide a very considerable spare capacity to encompass all other special factors, including age profile and other demographic circumstances and changes in economic circumstances.</p> <p>We do not therefore see a case for uplift of this base figure, based on the Council's aspirations for economic growth in the area, as is suggested in Partial Review Scoping Report.</p> <p>It is true that the government have indicated that the figures produced using the methodology may be increased, where it can be shown that additional housing is needed to support economic growth. But that is to deal with the exceptional cases, such as Cambridge where there is real, rapid technological and academic requirements for staff which will be supported only by appropriate new housing. Further there should be evidence of a Council both willing and also able to drive growth to a level where economic development would be hindered by the adherence</p>		

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	<p>to the standard methodology. Without in any way disparaging the desire of Bradford to up its game economically, it has a long way to go to reach parity and its economic aspirations are not being held back by lack of housing, but by far more fundamental issues such as some of the worst schools in the country, serious health and well being concerns, high levels of social deprivation. Whilst there is a clear political benefit in taking an optimistic view of the economic future of the city, which we hope is realised, the strategic assesment of housing need should be made on a realistic and objective basis, because of the other serious implications that arise from getting it wrong.</p>		
	<p>3. Factoring in past under delivery</p>		
	<p>3a. The assessment will need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, it states local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.</p>	<p>This approach is not considered in line with the PPG. The PPG is clear the affordability adjustment in the standard method is already applied due to household growth on its own being insufficient as an indicator of future housing need because household formation can be constrained to supply. The affordability adjustment is therefore applied to take account of past under-delivery (PPG Paragraph: 011 Reference ID: 2a-011-</p>	<p>CSPR014 CSPR015 CSPR017 CSPR021 CSPR029 CSPR032 CSPR033 CSPR034</p>

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		20190220).	
	4. Continue with the current housing requirement		
	4a. Bradford should continue their scale of housing based on at least 2,477 dwellings a year in the interests of effective and positive plan making.	<p>The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed.</p> <p>The current Core Strategy figure while not out of date was not calculated in line with the revised NPPF (2019). Therefore the CSCR will need to be undertaken fully in line with the latest NPPF and latest evidence. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period.</p>	<p>CSPR014 CSPR015 CSPR017 CSPR018 CSPR032 CSPR033 CSPR034</p>
	4b. I attended an elderly housing review by the housing department. I believe it identified a requirement for 50,000 homes per year at that time. Your figure is now less but the population has increased and planning permissions are more difficult and costly to achieve. Take this figure of 42100 and start being creative with old derelict buildings using compulsory purchase powers for those left empty for redevelopment, over retail space and before green field sites.	<p>The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed.</p> <p>The current Core Strategy figure while not out of date was not calculated in line with the revised NPPF (2019). Therefore the CSCR will need to be undertaken fully in line with the latest NPPF and latest evidence.</p>	CSPRQ026

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	5. Review of housing requirement is premature		
	<p>5a. The NPPF is clear that strategic policies should be reviewed every five years (para. 33) the CSCR could, therefore, be considered premature. Whilst paragraph 33 goes on to highlight earlier reviews should occur if local housing need is expected to change significantly in the future this must be read in conjunction with the Government's objective of significantly boosting the supply of homes (para. 59).</p>	<p>NPPF para 33 states reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. In addition NPPF para 212 states plans may also need to be revised to reflect policy changes which the replacement NPPF has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.</p> <p>National policy has changed since the adoption of the Core Strategy with the revised NPPF (2019) therefore the CSCR partial review is considered fully in line with the requirements in national policy.</p>	<p>CSCR018 CSCR032 CSCR033</p>
	<p>5b. Object to the review of Policy HO1 given that the Core Strategy has only recently been adopted and due to the uncertainty around the standard methodology. In its current form it does not form an appropriate basis upon which to justify undertaking a review of Policy HO1, and it appears that the Council are instigating the CSR</p>	<p>NPPF para 33 states reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. In addition NPPF para 212 states plans may also need to be revised to reflect</p>	<p>CSCR032 CSCR033 CSCR037</p>

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	<p>on the basis that the housing requirement will be reduced.</p>	<p>policy changes which the replacement NPPF has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.</p> <p>National policy has changed since the adoption of the Core Strategy with the revised NPPF (2019) therefore the CSCR partial review is considered fully in line with the requirements in national policy.</p>	
	<p>5c. Stop changing plans and the goalposts - I no longer trust government or Bradford council to make accurate decisions for our towns -</p>	<p>NPPF para 33 states reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. In addition NPPF para 212 states plans may also need to be revised to reflect policy changes which the replacement NPPF has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.</p> <p>National policy has changed since the adoption of the Core Strategy with the revised NPPF (2019) therefore the CSCR partial review is considered fully in line with the requirements in national policy.</p>	<p>CSCRQ003</p>

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	6. Cross boundary Issues		
	6a. the partial review should take full account of, and allow for cross boundary effects arising from directing growth to locations such as Steeton Silsden and Eastburn for example, on South Craven in particular.	Noted. the council will consider strategic cross boundary issues through the duty to co-operate	CSPR0019
	7. Support for use of standard method		
	7a. General support for using standard method	Noted. The council will use the standard method as the baseline housing need in line with national planning policy and consider the evidence for any uplift based on the factors set out in NPPF and PPG.	CSPRQ037 CSPRQ107 CSPRQ109 CSPRQ111 CSPRQ112 CSPRQ116
	7b. The Council should calculate the standard methodology and only increase this number if there is solid evidence for doing so. If there is an insufficient five year land supply then the numbers should be kept to a minimum.	Noted. The council will use the standard method as the baseline housing need and consider the evidence for any uplift based on the factors set out in NPPF and PPG. It is not considered that the housing requirement should be used to keep numbers to a minimum as this is not considered in accordance with latest national policy. The NPPF is clear the housing requirement should show the extent to which their identified housing need can be met over the plan period. Once adopted this will then	CSPR030

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		inform the 5 year land supply position.	
	<p>7c. Subsequent to the 2014 projections ONS has reduced the recent population estimates for Bradford and also published the 2016 based household projection in which the projected number of households for 2035 is now 215,800, nearly 20,000 lower than the 2014 projection. This latest projection ought to be the more accurate one. Because the 2014 projection assumes an additional 19,400 above and beyond the 2016 projection this should provide sufficient extra room for Bradford's economic growth aspirations without any further uplift above the 235,200 figure. The housing requirement figure should, therefore, be no higher than 1,650/year.</p>	<p>Noted. The council will consider local demographic issues including the latest household projections. The council agree that the 2014 household projections are higher than the latest 2016 projections. Therefore this includes an element of 'uplift' over the latest demographic evidence. The council will use the standard method as the baseline housing need and consider the evidence for any uplift based on the factors set out in NPPF and PPG.</p>	CSPRQ051
	<p>8. Object to use of standard method</p>		
	<p>8a. The application of the "standard methodology" is flawed as this methodology in trying to bring consistency fails to recognise that different areas behave differently and have different pressures and capacities. In simple terms Bradford and Leeds are quite different and to apply the same methodology to both areas, is a mistake. Economic growth for example is ONE factor and there are many more which will influence the predicted and actual growth and the type of housing that is most needed.</p>	<p>National policy is clear the standard method should be used unless exceptional circumstances can be demonstrated. The council therefore intend to use the standard method as the starting point in reviewing Policy HO1. Economic growth will be factored into any additional uplift on the baseline LHN figure derived from the standard method.</p>	<p>CSPRQ016 CSPRQ070 CSPRQ016</p>

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	8b. Predictions exceeding five years are always problematic.	National Policy is clear the standard method should be used unless exceptional circumstances can be demonstrated. The council therefore intend to use the standard method as the starting point in reviewing Policy HO1. As set out in the NPPF local plans should set strategic policies to plan for a minimum 15 years	CSPRQ034
	8c. The standard methodology is flawed and this becomes particularly apparent when applied to northern districts. 2. Bradford is one of the largest and most populated M.D.'s in the country with a much higher than average young population particularly within the economically active cohorts of the population. The local demographic characteristics need to be given considerable weight in the assessment of housing need. 3. Economic Growth and the strategic economic aspirations of the Council and the Leeds City Region are also very drivers of housing need and the achievement of a sustainable distribution of housing numbers to match employment levels in the District across the extended plan period	National Policy is clear the standard method should be used unless exceptional circumstances can be demonstrated. The council therefore intend to use the standard method as the starting point in reviewing Policy HO1. The council will consider Local demographic and economic evidence which will be factored into considering if any additional uplift on the baseline LHN figure derived from the standard method is justified.	CSPRQ070
	8d. The current housing need figure is set at 42,100 dwellings over the plan period, where the	National planning policy is clear the standard method should be used unless exceptional	CSPRQ075 CSPRQ076

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	<p>review suggests lowering the Local Housing Need (LHN). We do not agree with this approach. The Council propose to use the Government's Standard Methodology to establish the baseline minimum housing need figure. However, it is recognized that this is still a new method with new calculations expected for release summer 2019. Given that there has been persistent under delivery against housing targets (largely due to heavily constrained land) and that there are still issues to be resolved with the Government's standard methodology, we recommend that BMDC undertake a new Local Housing Needs Assessment to ensure that the housing requirement accurately reflects Bradford's housing needs taking into account the economic growth aspirations of the area. We note that the Leeds City Region Statement of Common Ground (August 2018) states that the City Region authorities plan for 13,000 additional homes per year in the City Region. Appendix 1 of the Statement of Common Ground shows that this is achievable if Bradford plans for 2476 new homes per year. It is interesting to note that if the City Region authorities only achieved the Standard Methodology they would only achieve a combined 10,777 new homes per year. Therefore, the Leeds City Region through the Statement of</p>	<p>circumstances can be demonstrated. The council therefore intend to use the standard method as the starting point in reviewing Policy HO1. The council will consider local demographic and economic evidence, which will be factored into considering if any additional uplift on the baseline LHN figure derived from the standard method is justified. The council will consider strategic cross boundary issues through the Duty to Co-operate.</p>	

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	Common Ground is seeking to be significantly more ambitious taking into account the economic growth aspirations of the area.		
	8e. Looking into the number of homeless and the housing waiting lists should be considered a priority as these are "actual" numbers and not "standard methodology".	National planning policy is clear the standard method should be used unless exceptional circumstances can be demonstrated. The council therefore intend to use the standard method as the starting point in reviewing Policy HO1. Homeless and housing need will be considered through the SHMA as part of the need for affordable housing in the District.	CSPRQ100
	8f. Surely a measure of the types of housing needed is also required? For example, the majority of developments in and around BD10 have been made up of mostly large, unaffordable housing.	National planning policy is clear the standard method should be used unless exceptional circumstances can be demonstrated. The council therefore intend to use the standard method as the starting point in reviewing Policy HO1. housing need will be considered through the SHMA as part of the need for a mix of housing as set out in Policy HO8 and affordable housing (Policy Ho11) in the District	CSPRQ100
9. Housing requirement should be lowered to protect greenfield/greenbelt areas			
	9a. General comments that the housing requirement should be set to protect greenfield/Greenbelt sites and prioritise brownfield land only.	The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include the impact on special protected areas in the	CSPRQ002 CSPRQ003 CSPRQ027 CSPRQ030 CSPRQ032

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		<p>NPPF such as green belt. However national policy is clear objectively assessed housing needs should be met as a minimum unless policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Therefore while the council will prioritise the use of PDL land and buildings it is not considered in line with national policy to determine the housing requirement based only on available brownfield land.</p>	<p>CSPRQ037 CSPRQ049 CSPRQ069 CSPRQ071 CSPRQ089 CSPRQ114</p>
	<p>9b. It is important that CBDMC take note of the inspectors call for the reduced number of dwellings previously estimated. If the higher figure is adopted it will put pressure on Bradford's green spaces which will make it a less attractive place to live and work and therefore make people not want to live there and hence reduce the need for more housing !!!</p>	<p>The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include the impact on special protected areas in the NPPF such as green belt. However national policy is clear objectively assessed housing needs should be met as a minimum unless policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits</p>	<p>CSPRQ039</p>

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	10. Infrastructure constraints		
	10a. General comments relating to the need to factor in infrastructure constraints such as roads, congestion, schools, doctors when considering the amount of housing to be planned for	Infrastructure issues will be considered through the update to the Local Infrastructure Plan. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery such as infrastructure. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits	CSPRQ008 CSPRQ022 CSPRQ031 CSPRQ038 CSPRQ095 CSPRQ090 CSPRQ098 CSPRQ105
	11. Include allowance for vacant stock		
	11a. General comments that the Council should ensure factors in reduction of vacant/empty houses in determining local housing needs	<p>The council agree vacant homes may be considered when in determining the net housing requirement. However a reduction in vacant dwellings should only be considered where there is clear robust evidence to justify this and there is reasonable certainty the reduction will be delivered.</p> <p>It is currently considered that the evidence does not justify including a figure for a reduction in vacant homes when considering the housing requirement. However the council</p>	CSPR039 CSPRQ015 CSPRQ018 CSPRQ031 CSPRQ037 CSPRQ049 CSPRQ061 CSPRQ080 CSPRQ090 CSPRQ098 CSPRQ114

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		will continue to assess any emerging evidence and council strategies in the preparation of the CSPR and consider if there is any justification and is so what figure should be used.	
	12. Area specific issues		
	12a. Silsden has had lots of new homes, why does it need more built on green belt when there is plenty of brownfield in Keighley and Bradford	This comment relates to the housing distribution and greenbelt policies of the CSPR. It is considered that National planning policy has changed since the adoption of the Core Strategy with the revised NPPF (2019). NPPF para 33 states reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. In addition NPPF para 212 states plans may also need to be revised to reflect policy changes which the replacement NPPF has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan. The CSPR will consider the latest most up to date evidence on housing and economic growth in reviewing Policy HO1 in line with national policy.	CSPRQ020

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	<p>12b. 1200 houses were allocated to Silsden. There have already been approx 800 either built or planning permission given. The number of houses allocated to Silsden should not be increased until something is done about the traffic through the town, either a bypass or a new trunk road to take traffic away from the only road which runs through Silsden. There are serious issues in Silsden due to aquifer rock which runs under a large part of the town and is seriously affecting the building of houses by Harron Homes at Sykes Lane. It also looks as though the site for the new school is affected by the same thing.</p>	<p>This comment relates to the housing distribution and greenbelt policies of the CSPR.</p>	<p>CSPRQ043</p>
	<p>12c. Extremely concerned about the Worth Valley Villages. Accept the need for new housing but not 5/6 bedroom luxury homes which locals cannot afford and which attract "weekend" and "holiday use". People using little villages as "dormitory" villages . driving through to their homes and contributing little if nothing to local communities and economies. Infrastructure, as we stand now, is not there or in dire need of upgrade. Planners need to look at the needs of the local communities first and foremost before approving more and more housing with NO school places, NO places in doctors surgeries and roads which are becoming totally gridlocked. Why not be totally forward thinking and build a new town or new</p>	<p>This comment relates to the housing distribution HO3 and greenbelt policies SC7 of the CSPR.</p> <p>Infrastructure issues will be considered through the update to the Local Infrastructure Plan. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery such as infrastructure. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would</p>	

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	village on the outskirts including schools doctors and appropriate roads in and out. In our village the one main road which goes through was built for horses and carts and is often single way traffic only. Costly, I know, but better and possibly cheaper in the long run.	significantly and demonstrably outweigh the benefits	
	12d. Housing provision should be reduced. Haworth/ Cross Roads/ Stanbury local infrastructure cannot support additional development, and the environment's rural assets should be protected.	<p>This comment relates to the housing distribution Policy HO3 of the CSPR.</p> <p>Infrastructure issues will be considered through the update to the Local Infrastructure Plan. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery such as infrastructure. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits</p>	CSPRQ079
	12e. I think Idle / Thackley area has already given up so much of its green space and the plan should look at different areas . The infrastructure impact and destruction of fields is now out of proportion with other areas . Also the housing isn't	<p>This comment relates to the housing distribution Policy HO3 of the CSPR.</p> <p>Infrastructure issues will be considered through the update to the Local Infrastructure</p>	CSPRQ093

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	<p>particularly affordable . The planning needs to be more thorough rather than just selling off fields n popular areas used by horses, dog walkers, children playing , and if all the fields are built on the area will no longer be for the residents . Please don't let the housing companies dictate the planning. Very concerned citizen. Also why no consultation in our area?</p>	<p>Plan. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. This will include strategic constraints to delivery such as infrastructure and protected areas in the NPPF. However national policy is clear identified objectively assessed housing needs should be met as a minimum unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p> <p>Affordable housing is considered through Policy HO11 in the C SPR.</p>	
	<p>12f. Do there really need to be anymore on Idle moor of Bradford? Perhaps some more could be built on council land such as on Thorpe edge and Ravenscliffe, there's more space.</p>	<p>This comment relates to the housing distribution Policy HO3 of the C SPR.</p>	<p>C SPRQ094</p>
	<p>12g. These figures have now proven to be over-inflated, the figures provided by the ONS are considerable below. The standard methodology is still over generous regarding housing need in the outer districts. Are the council intending to proportionately or selectively reduce the numbers throughout the district. Evidence suggests that the housing need is in central Bradford and central</p>	<p>National planning policy is clear the standard method should be used unless exceptional circumstances can be demonstrated. The council therefore intend to use the standard method as the starting point in reviewing Policy HO1. This comment relates to the housing distribution Policy HO3 of the C SPR.</p>	<p>C SPRQ108</p>

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	Keighley to reduce commuting and support the retail sector		
	<p>12h. We welcome a review of the supply of housing land within the review period. As our very specific concerns relate to the preservation of Green Belt land within the South East of the Regional City, our view is that a fundamental rethink is needed, made possible by substantial reductions in the projected housing numbers, whereby the strategic objective is to produce a slim, efficient, prosperous city where land use is optimised, where the value of our built environment is driven up and where citizens are able to enjoy the recreational benefits of the countryside surrounding our city to the greatest extent.</p> <p>This means also reviewing those elements of the Core Strategy which have not taken account of the massive switch in retail to on-line, so as to make maximum use for housing of the many retail sites which will, within the Review Period, be relinquished and to bring people back into the city centre. It means abandoning the strategy of car dependent estates on the fringes of the settlements and bringing people nearer to the public transport hubs and nearer to community services.</p> <p>The Council should review the Adopted Bradford</p>	<p>This comment relates to the housing distribution Policy HO3 of the CSCR and Green Belt Exceptional circumstances in Policy SC7.</p>	<p>CSPRQ114</p>

Appendix 4: Policy HO1 - Comments Received and CBMDC Response

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	<p>City Centre Area Action Plan in the light of the very rapid developments in retailing, and the likely effects of demographics, funding changes and economic pressures facing universities and further education institutions, and switches from further education to apprenticeship and other in work training, which could result in significant drops in the number of students requiring residential accommodation in the centre and the possible release of educational land for housing.</p> <p>We urge the Council to take this opportunity of reduced housing targets to review all elements of the Core Strategy which provide for housing overspill into the Green Belt. The Green Belt should not be regarded as an easy supply of readily developable land, but as a welcome constraint forcing developers and the Council itself to use existing previously developed and undeveloped land within the Green Belt in the most efficient manner possible</p>		
	<p>13. The policy needs to be kept under review</p>		
	<p>13. the Council needs to keep its finger on the pulse as requirements can change unpredictably, and one very unpredictable factor will likely be Brexit.</p>	<p>Noted. the council will monitor the adopted Local plan and review the Policies at least once every five years, and updated them as necessary in line with the NPPF</p>	<p>CSPRQ116</p>

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	Distribution of Housing Development		
	1. General Comments		
	1a. We welcome the fact that this will be reviewed on the basis of updated needs (SHMA) combined with land availability. This is an important distinction from the Leeds Core Strategy where – inexplicably - need has not informed distribution.	The SHMA will inform the review of a number of policies most notably those relating to the overall need for new homes, the need for affordable housing, housing mix and the needs of specialist groups. Housing distribution will, as was the case in the adopted Core Strategy, be informed by a wide range of factors and evidence including the SHMA and SHLAA. The Council will not however be attempting to calculate specific needs assessments for individual assessments and the SHMA would not provide adequate data or evidence to do so.	CSPR024
	1b. We support the proposed approach, which will give due consideration to the appropriateness of the current distribution set out in Policy HO3 including completions and extant permissions in each settlement since the start of the adopted Core Strategy plan period (2013).	The comments are noted.	CSPR029
	2. Development targets / minimum		
	2a. Presently the Core Strategy sets out how much housing should be built in each selected settlement. For example for East Morton it suggests a minimum of 100 dwellings. This provides both clarity and certainty to developers, the Council and local communities. As such we would see no need to change from this approach, where such figures are seen as a minimum figure not an upper limit.	The wording of Policy HO1 within the adopted Core Strategy indicates that the Local Plan will allocate land to meet the requirement for at least 42,100 new homes over the plan period. The wording of Policy HO3 does not include the words 'minimum'. However in the context of Policy HO1, individual settlement targets cannot be treated as upper limits. A similar approach to the wording of Policies HO1 and HO3 will be taken in the CSPR.	CSPR017

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

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	3. Range and choice of sites and locations		
	3a. In line with NPPF para 59, and in order to significantly boost the supply of homes, it is important that any revised Core Strategy retains a choice and variety of housing delivery options, rather than focussing significantly on one area or type of proposed site.	The CSPR will not be allocating sites. It will include policies which ensure that a mix of new homes are provided. It will allow for varying levels of housing development in locations across the district and in so doing meet the needs of the district's current and future residents in sustainable locations.	CSPR001
	4. Brownfield land		
	4a. The HBF consider that the efficient use of land including the re-use of previously developed land can perform an important role as part of a balanced portfolio of housing sites. Therefore, this policy direction is generally supported providing this is not interpreted as prioritisation of such sites.	In reviewing the housing distribution the Council will ensure that it has taken account of and made maximum use of suitable, available and developable previously developed land and buildings in line with the NPPF paragraph 117. Policy HO6 of the adopted Core Strategy, which was found sound at Examination, indicates that the Council will give priority to the development of previously developed land and buildings.	CSPR002
	4b. Taking account of the Government's revised position in the Framework it is appropriate that the Council's consideration of deliverable brownfield sites should not automatically prioritise brownfield sites ahead of sustainable greenfield sites in the right locations that meet the strategic priorities.	As part of the CSPR the Council will consider whether any changes are needed to Policy HO6 which was considered sound following examination in 2015. The revised housing distribution will take account of the nature and distribution of potential deliverable and developable sites, including both brownfield and greenfield options.	CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR012 CSPR013
	4c. A number of comments are made acknowledging the importance of using and prioritising brownfield		

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	<p>sites but stating that their contribution could be constrained and thus this can only be part of the solution to meeting need:</p> <ul style="list-style-type: none"> • the re-use of previously developed land does not always represent the most sustainable and deliverable option - an over reliance on potentially constrained, contaminated or unviable sites would result in the authority failing to identify sufficient 'deliverable and developable' land for development • The principle of focusing growth on existing areas is correct however brownfield land is not either located where people want to live or is viable to develop. Availability and suitability of land must be considered. • Whilst generally priority should be given to previously developed land (brownfield land) and the main focus of housing should be within the main built up areas of the District, we consider that there are insufficient brownfield sites within the settlement to meet the identified need. 	<p>This is a matter in the main for the process of site selection within the Allocations DPD. The review of Core Strategy Policy HO3 will take into account a variety of evidence including the scale and nature of land supply , and deliverability and will also be informed by an updated Local Plan Viability Assessment.</p> <p>The Council's updated evidence base, which will inform both the spatial distribution of development and the choice and allocation of sites will include assessments of market conditions, site availability and viability assessment. This will ensure that reasonable alternatives which are deliverable over the plan period are identified. The Council will work, through both formal and informal regeneration initiatives and its housing delivery action plan, to improve the prospects for investment and development in sustainable urban locations.</p> <p>Agreed. While the Council will promote and facilitate development on suitable brownfield sites it will also supplement this with carefully selected green field sites and, where exceptional circumstances exist, with green belt land releases.</p>	<p>CSPR014 CSPR015 CSPR034 CSPRQ075 CSPRQ076</p> <p>CSPRQ16</p> <p>CSPRQ075 CSPRQ076</p>

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

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	4d. New NPPF gives greater emphasis to brownfield sites, densities, quality and affordability, so we would expect these to be taken into account in informing the distribution.	The comments are noted.	CSPR024
	4e. A number of comments were received urging a greater focus on brownfield sites or that brownfield land should be used first.	The revised plan will give priority to the delivery of homes on such sites however a crude brownfield first policy would not accord with the NPPF and would undermine housing delivery.	CSPRQ049 CSPRQ069
	4f. The reduction in the housing requirement figures allows a higher proportion of housing to be built on brownfield land.	It is unfortunately not that simple and is not necessarily the case as in addition to a reduced overall housing requirement the Council also has to take account of updated evidence on land supply and the scale of deliverable and developable brownfield sites. In addition the Government has now placed a much greater emphasis on local plans proving that sites are viable rather than leaving such consideration to the planning applications stage.	CSPRQ051
	5. Release of green belt land		
	5a. A number of comments were received either raising general concerns and opposition to the use of green belt land or making arguments that there was no need or justification for such releases: <ul style="list-style-type: none"> • General concerns: 	The Council notes the concerns raised. However it considers that in line with national planning policy there are exceptional circumstances for making limited changes to the green belt to meet development needs and that such releases can be achieved without undermining the local or strategic functioning of the green belt and in sustainable locations.	CSPRQ005 CSPRQ018 CSPRQ031 CSPRQ036 CSPRQ040 CSPRQ073 CSPRQ100 CSPRQ105 CSPRQ117

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	<ul style="list-style-type: none"> • It is shameful how easily the council can justify exceptional circumstances for the removal of green space and green belt. • There will be none left and the areas once considered desirable due to this will deteriorate in value. • Council policy appears to favour Green-belt and 'very special circumstances' which are not adequately defined within the Core Strategy. 	<p>The Council disagrees. The Council follows government guidance which sets challenging tests for establishing whether exceptional circumstances exist to release land from the green belt. The Council's conclusions that such circumstances existed where scrutinised and found to be sound when preparing the Core Strategy. The review of the Core Strategy will take a fresh look at this issue and again be conducted in line with Government guidance.</p> <p>This is incorrect. The green belt accounts for 23,886ha of land within the district – approximately 65% of its land area. Any proposals for green belt land releases in the CSPR, if made, will only affect a tiny proportion of this area.</p> <p>The Council disagrees. The policies within the adopted Core Strategy have already been subject to consultation, scrutiny and been found sound by the Planning Inspectorate. Secondly the correct test for plan making is not the 'very special circumstances' test (which is the test for planning applications) but exceptional circumstances test. Thirdly whether taking the adopted Core Strategy or the review, the majority of the district's development is planned within settlements not within green belt.</p>	<p>CSPRQ086</p> <p>CSPRQ086</p> <p>CSPRQ036</p>

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	<p>5b. A number of comments were received relating to the number of vacant homes in the district, questioning the need for new homes or stating that green belt should not be touched when houses are empty across the district.</p>	<p>Such a moratorium would not be in accordance with national planning policy.</p> <p>The Council recognises the importance of addressing and reducing the number of empty homes and has a strategy and action plan accordingly. However it simply incorrect to suggest that the level of empty homes and the capacity of such long term vacant homes would be remotely sufficient to meet the district's needs even if it were possible and practical to bring every one back into use and to prevent any further properties becoming vacant.</p>	<p>CSPRQ089 CSPRQ006 CSPRQ037</p>
	<p>5c. A number of people express the view that there is no need to use green belt land as there is sufficient land within settlements and in particular brownfield sites</p> <ul style="list-style-type: none"> • No need for green belt to be used. There is masses of unused brownfield sites in Bradford. • The approach to green belt is appalling as has been the lack of focus on inner city areas where there is most need for affordable housing; 	<p>The Council disagrees. Brownfield sites and sites within settlements can make a significant contribution however the Council's SHLAA indicates that there is insufficient deliverable and developable land in such locations to meet the district's needs in full without resorting to limited releases of green belt land.</p> <p>The Council disagrees. Both the adopted Core Strategy and the CSPR focus development on the urban areas and make maximum use of the deliverable and developable land supply within settlements.</p>	<p>CSPRQ020 CSPRQ027 CSPRQ032 CSPRQ037 CSPRQ040 CSPRQ041 CSPRQ058 CSPRQ100 CSPRQ101 CSPRQ117</p> <p>CSPRQ009 CSPRQ025</p>

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	<ul style="list-style-type: none"> • Brownfield wherever possible; • Our villages are merging into one huge sprawl 	<p>This is precisely what the Council are seeking to achieve within the constraints of land supply and achieving a reasonable mix and distribution of development.</p> <p>This is incorrect. There are no proposals in either the adopted Core Strategy or the current review for the merger of any villages.</p>	<p>CSPRQ035</p> <p>CSPRQ058</p>
	<p>5d. Who determines site availability? Surely compulsory purchase would overcome this.</p>	<p>As part of its work in producing a SHLAA, the Council considers whether a site can be classified either as available now, or likely to be available at some future point based on principles and definitions set out within the National Planning Practice Guidance (NPPG). Extracts from the relevant paragraph of the NPPG are given below:</p> <p>“A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Because persons do not need to have an interest in the land to make</p>	<p>CSPRQ005</p>

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		<p>planning applications, the existence of a planning permission does not necessarily mean that the site is available.” Paragraph: 020 Reference ID: 3-020-20140306”</p> <p>Compulsory purchase is a complex, expensive and time consuming process which can practically only be used in limited circumstances such as to achieve the delivery of specific regeneration projects or infrastructure proposals. CPO is itself subject to legal processes and rights of appeal. The use of CPO is a last resort which should only be used after negotiations with land owners have failed and CPO's normally have to be related to sites and schemes which are already in the Local Plan.</p>	
	<p>5e. A number of people stated the view that Green Belt should be protected at all costs. No green belt development under any circumstances.</p>	<p>To protect the green belt 'at all costs' implies that options for housing distribution involving green belt change would not in any circumstances be given proper consideration. This would conflict with national planning policy. The Council will therefore assess all reasonable alternatives in reviewing Policy HO3 and re-setting the housing distribution and this will include options which involve green belt change. However green belt releases will only be proposed if having assessed the updated evidence it is considered justified by exceptional circumstances and in accordance with Government policy.</p>	<p>CSPR030 CSPRQ054 CSPRQ098</p>
	<p>5f. The HBF is generally in support of the Council</p>	<p>The comments are noted.</p>	<p>CSPR002</p>

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	<p>considering the potential to release Green Belt land if it is needed and in line with NPPF paragraphs 136 & 137 where it has fully examined all other reasonable options.</p>		
	<p>5g. We welcome the Council's approach to review the outcomes of the Green Belt review to determine the potential to release areas of land. We consider that this approach is essential in distributing housing development as there are insufficient brownfield and greenfield sites within settlement limits to meet the identified need.</p>	<p>The comments are noted.</p>	<p>CSPRQ075 CSPRQ076</p>
	<p>5h. A number of comments are made which argue that the Council should continue to propose a distribution of housing which requires and assumes releases of green belt land:</p> <ul style="list-style-type: none"> • The Council should continue in its pragmatic approach to housing distribution, including the need for the release of Green Belt in appropriate circumstances. <ul style="list-style-type: none"> • Whilst we recognise that the Partial Review may result in a reduction to the housing requirement, we consider that Green Belt amendments will still be required to deliver housing in the right locations within the District. • The need for housing, and the economic and 	<p>The Council will look at a variety of distribution options. It will use the updated evidence base to test reasonable alternatives. A distribution which involves green belt releases may be proposed but only if it is justified having taken account of that evidence and only if having applied the government's guidance contained within NPPF paragraphs 136-7, exceptional circumstances are shown to exist. The Sustainability Appraisal underpinning the assessment of options will ensure that the social and economic benefits and impacts of options are taken into consideration.</p> <p>The comments are noted.</p>	<p>CSPR001 CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR012 CSPR013 CSPR041</p>

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	<p>social benefits that the delivery of affordable housing brings over the long term to an area, should not be underestimated in reviewing the Green Belt within the context of Policy HO3.</p> <ul style="list-style-type: none"> • Houses should be built where they are needed and can be done so safely, even if in the green belt. • Some sites such as those previously developed or not in use should be releases. • The Bradford area has a massive area of green space. There is too much emphasis put on not developing green belt. • Green belt restrictions should be removed on area which do not meet green belt policy criteria. 	<p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>CSPRQ007</p> <p>CSPRQ011</p> <p>CSPRQ012</p> <p>CSPRQ060</p>
	<p>6. Deliverability & Viability</p>		
	<p>6a. The Council propose to review the deliverability and viability of sites, this is supported and the HBF would strongly recommend engaging with the house building industry to ensure this happens.</p>	<p>The comments are noted. The Council's work on the latest SHLAA update has included engagement and input from house builders via the working group.</p>	<p>CSPR002</p>
	<p>6b. The reference within the Scoping Report to sites being reviewed for delivery and viability is welcomed.</p>	<p>The comments are noted.</p>	<p>CSPR005</p> <p>CSPR006</p> <p>CSPR007</p> <p>CSPR008</p> <p>CSPR009</p> <p>CSPR010</p> <p>CSPR011</p> <p>CSPR012</p> <p>CSPR013</p>

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	<p>6c. Building at density on PDL sites is only viable insofar as certain capital values can be reached, otherwise developers will not build. This is due to certain economic realities and cash flow positions which result in greater challenges when compared with Green Belt sites.</p>	<p>Both the Core Strategy and the Allocations DPD will be informed by an updated Viability Assessment. This will enable the testing of sites of varying sizes, locations and densities.</p>	<p>CSPR014</p>
	<p>6d. A number of comments are made suggesting that the revised distribution should take account of concerns over the viability of housing sites within the Bradford urban area:</p> <ul style="list-style-type: none"> • With Bradford a lower value city when compared nationally it is unlikely to be attractive for large scale city/ district centre investment in historic buildings, such as mills, which represent higher build costs and increased technical difficulties. • It is important to recognise the viability challenges in the inner urban areas of Bradford and Keighley as indicated by the baseline viability appraisals for the Core Strategy Viability Assessment (December 2014) produced negative land values for these areas. • Given the deliverability issues in a number of areas in the District, particularly around the inner City, our client considers that it is necessary to retain the previous distribution as a minimum, however a scenario whereby a higher proportion of growth is distributed to towns and villages in the District, where there is significant developer interest in bringing sites forward would ensure the homes that are needed are met. To continue focussing 	<p>While there will be challenges in some instances in bringing forward such sites it is important that the Plan make maximum use of previously developed land and buildings as in many cases they would offer extremely sustainable locations for development precisely in the areas where housing is most acutely needed.</p> <p>The adopted Core Strategy does not seek to focus allocations in areas where development will not be delivered. The distribution was found sound at examination and reflected a balanced approach which as well as looking to secure the use of deliverable and developable brownfield sites also included provision for significant development on green field and green belt locations. Any revised distribution will need to</p>	<p>CSPR014</p> <p>CSPR018</p> <p>CSPR032 CSPR033 CSPR037</p>

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	allocations in areas where they may not be delivered is illogical and will only further exacerbate delivery issues in the future	continue to take a balanced approach but will also need to reflect the updated evidence base on both need and land supply. The distribution may therefore need to be amended.	
	6e. Bradford Council is updating its Local Plan Viability evidence and it is important that this is used to inform the policies in the CSPR.	Agreed.	CSPR018
	6f. Given the Green Belt restrictions around many of the District's towns and villages, low levels of delivery are not a reflection on a lack of developer interest, it is simply down to the restrictive nature of Green Belt policy. As such, our client is concerned by the Council's proposals to consider data on completions as a means of assessing where new housing should be located.	The data referred to is just one aspect of the updated evidence base which will be taken into account in reviewing Policy HO3 – there is no indication in the scoping paper that recent rates of completions will be translated directly into revised housing distribution. The Council is aware that in some areas lack of sites will have contributed to low levels of recent development activity.	CSPR032 CSPR033 CSPR037
	7. Infrastructure		
	7a. A number of general comments relating to infrastructure were made including the need to take account of infrastructure in determining the distribution and general concerns and need for distribution to avoid more development where infrastructure and services such as education and GP's are under pressure.	<p>The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to single areas and will be an issue more or less wherever the new homes are allocated.</p> <p>The district's population is growing and will continue to do so and therefore infrastructure and services will need investment and improvement across the district. The Council is producing an updated Local Infrastructure Plan to address</p>	CSPRQ002 CSPRQ031 CSPRQ032 CSPRQ040 CSPRQ048 CSPRQ063 CSPRQ064 CSPRQ071 CSPRQ086 CSPRQ088 CSPRQ091 CSPRQ110 CSPRQ117

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		<p>these issues. It has and will continue to consult with utility providers as part of that work. The Local Infrastructure Plan indicates a number of challenges in accommodating future growth but does not indicate any major infrastructure issues which are not capable of resolution given the necessary resources, careful forward planning and continuing co-operation between the Council and relevant stakeholders.</p> <p>As part of its statutory duties the Council's Education Service will continue to plan for future educational service needs and the Council's new statutory development plan, by providing more certainty over the levels of growth planned in each area, will actually assist it in both the planning process and its ability to bid for funding</p>	
	<p>7b. Infrastructure should be put in place before or simultaneously with new housing.</p>	<p>There may be some instances where it would not be appropriate for development to begin before a specific piece of infrastructure is in place but in many cases such an approach would be neither justified, proportionate or reasonable.</p>	<p>CSPRQ041 CSPRQ058</p>
	<p>7c. No further housing should be considered until proper and full infrastructure is put in place. To continually build random, piecemeal housing developments is undesirable and has a negative detrimental effect on both new and existing residents.</p>	<p>The Council appreciates the importance of planning for the infrastructure required to support housing growth. The CSPR will be informed by the production of a revised Local Infrastructure Pan and by engagement with key utility, service and infrastructure providers. However it should be noted that the Government requires Council's to</p>	<p>CSPR030</p>

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		plan positively to meet the development including housing needs of its population and such a negative and unnecessary moratorium on new housing development would not be in accordance with Government policy and guidance.	
	7d. The plan is too vague – it should be more specific with regards to infrastructure.	The Council disagrees. It has produced a Local Infrastructure Plan which meets the requirement of government guidance and I proportionate in content and detail to what is a strategic plan.	CSPRQ041
	7e. There needs to be better co-ordination with infrastructure and service providers including Yorkshire Water, Highways Agency, NHS etc.	The Council agrees that co-ordination with infrastructure service providers is important and is carrying out these functions in an appropriate manner.	CSPRQ041
	7f. It is also crucial that in determining a hierarchy for development that consideration is given to existing and planned infrastructure in place within the district as well as other facilities and capacity.	The comments are noted. The CSPR will be informed by a revised and updated Local Infrastructure Plan.	CSPR014 CSPR034
	7g. Any evidence relating to infrastructure provision in particular, should also account for cross boundary affects the arising from the delivery of housing allocations (and growth overall) in Bradford district on matters such as infrastructure provision in Craven district and North Yorkshire. This should be taken into account as part any review housing distribution in Bradford district.	The comments are noted. The Council will continue to work co-operatively with neighbouring authorities as the new plan evolves. Robust existing mechanisms for assessing and responding to cross boundary issues and impacts will be utilised and this will include assessing issues relating to areas within Craven district and infrastructure planning within both local authority areas.	CSPR019
	7h. I can never find any information around infrastructure, particularly in Bradford NW for over subscribed bus series, schools, doctors and NHS dentists. I therefore draw the conclusion this isn't	This is not correct. The Council's Infrastructure Plan is available on the Council's website.	CSPRQ086

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	accurately considered in the overall plan.		
	8. Settlement Hierarchy		
	8a. A number of comments were received in support of the use of the settlement hierarchy in determining the housing distribution:		
	8b. We agree with and support the settlement hierarchy. The distribution of housing in accordance with a settlement hierarchy is logical, and this approach is supported in principle.	The comments are noted.	CSPR003 CSPR019 CSPR021 CSPRQ099
	8c. The housing numbers should trickle down based on the settlement hierarchy.	The settlement hierarchy will be a key factor in determining the revised housing distribution but will sit alongside a range of other criteria and evidence.	CSPR014 CSPR015 SCPR034 CSPRQ075 CSPRQ076
	8d. The approach to distribute housing in accordance with the settlement hierarchy is logical. However each settlement identified must be apportioned some housing growth to assist in delivering the overall housing requirement.	The Council disagrees. It is not appropriate to determine, ahead and irrespective of any analysis of the evidence and the potential distribution options, that all settlements in the hierarchy must be apportioned some housing growth.	CSPRQ099
	8e. The new distribution should be balanced across the settlement hierarchy in very similar proportions to those contained in current Core Strategy policy. Primacy of distribution to the main urban area, principal towns and local growth centres, while still making provision for housing need in the local service centres achieves a more balanced and sustainable outcome than alternative distribution strategies, by supporting local services and jobs in the smaller settlements in the hierarchy and channelling higher	The comments are noted.	CSPRQ070

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	proportions of housing delivery to those settlements which have the infrastructure to sustain growth and where it would produce the sustainable growth outcomes necessary.		
	8f. The settlement hierarchy is historic. We need to look to the long term rebuilding of Bradford itself rather than endlessly spreading outwards.	<p>The Council disagrees. The settlement hierarchy was reviewed as part of the preparation of the Core Strategy and reflects the current roles and characteristics of those settlements together with their potential to grow in a sustainable way.</p> <p>Both the adopted Core Strategy and CSCR propose that significant development can be accommodated within the urban areas. However constraints on land supply mean that the development needed cannot be accommodated without green belt releases. The Council considers that exceptional circumstances exist for green belt releases around the regional city and that these can be achieved in a sustainable way.</p>	CSPRQ056
	9. Need For Affordable Housing		
	9a. Those locations within the District where issues of affordability is most acute should be a focus of development. Specifically, the Wharfedale sub-area is such a location where new housing is required to address such factors.	The revised distribution will take into account the need to provide for affordable housing and the evidence from the updated SHMA as to where that need is most acute.	CSPR021
	10. Heritage Assets / Haworth & Baildon		
	10a. In reviewing the potential distribution of housing, account needs to be taken of the degree to which future housing growth would be compatible with the	In producing the current Core Strategy the Council responded to concerns raised by Historic England in its consideration of the most	CSPR004

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	appropriate conservation of the District's heritage assets, especially Bradford's most important and high-profile heritage assets - the World Heritage Site, at Saltaire, and the village of Haworth. In this respect the Core Strategy Inspector considered it was wholly appropriate to take a more precautionary approach towards the development capacity of these two locations.	appropriate housing distribution and in certain cases proposed modifications which were supported by the Inspector. The CSPR will continue to take full account of the need to ensure that any proposed housing distribution can be accommodated acceptably within these sensitive parts of the district.	
	11. Flood Risk		
	11a. A number of comments and concerns were raised relating to flood risk and arguing that housing sites and housing distribution should avoid areas of flood risk and take into account increased risk as a result of climate change.	The Council's CSPR and its housing distribution will be informed by an updated level SFRA and will accord with national planning guidance by directing development to areas of lowest flood risk.	CSPRQ022 CSPRQ029 CSPRQ038 CSPRQ058 CSPRQ64 CSPRQ109 CSPRQ110 CSPRQ117
	11b. Building on flood plains is not the way to go, no matter what the experts say, nature wins in the end. Flood plains can be set aside for wildlife etc.	The Council's proposed housing distribution will not require building on the functional flood plain and its land supply analysis within the SHLAA has already categorised as unsuitable any sites falling within the functional flood plain (flood zone 3b).	CSPRQ063
	11c. More consideration should be given to flood risks areas. The reports on flooding impact should be more robust.	The adopted Core Strategy was informed by a robust SFRA and took an appropriate and sound approach to housing distribution in line with national planning policy, and the sequential approach to avoiding and minimising flood risk. Issues and concerns raised in relation to flood risk and underpinning evidence were considered at Examination. The Council is preparing an updated	CSPR030

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		SFRA Level 1 study and working closely with the EA and this work will inform the review of Policy HO3.	
	11d. We are pleased to see that the updated SFRA will be used to inform the evidence base and to influence the distribution of development as the core strategy and site allocations documents progress. Such supporting evidence should be used to demonstrate that the council has taken a sequential approach in relation to the avoidance of flood risk to the location of new development.	The comments are noted.	CSPR031
	12. Evidence		
	12a. It is acknowledged that the SHMA will be important in establishing any changes to the distribution of housing and the SHLAA update will be important in identifying available, deliverable and developable land.	The comments are noted.	CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR012 CSPR013
	13. Regional City / Bradford		
	13a. A number of comments were received raising concerns that a reduced overall district wide housing requirement might lead to an increased proportion of development in the City of Bradford. Concerns with this included weak markets, and deliverability and viability issues in some areas. Such an increased focus on the city could undermine delivery contrary to	The Council's adopted Core Strategy requires the development of over 27,000 new homes within the Regional City. Issues relating to deliverability, viability and the nature of the housing market were debated at the Core Strategy examination. Although a challenging target the examination found this to be a sound appropriate and	CSPR003

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	government policy to boost the supply of housing. It would also undermine the Council's own Economic Strategy. The proportion should remain at 66%. Development should be distributed to	sustainable approach to meeting housing need. In carrying out the review the Council will look at a range of factors but will need to bear in mind any changes in circumstance, policy and evidence and thus it would not be appropriate to take a fixed approach to the review and rule out some changes to the housing distribution proportions or rule out increases (or decreases) in some settlement and areas.	
	13b. Whilst it is appropriate that the greatest proportion of the housing growth should be directed to the City of Bradford this should not be at the expense of housing delivery and the needs of other settlements and parts of the District. Sustainable growth should also be supported throughout the District on suitable sites.	The comments are noted.	CSPR003 CSPR044
	13c. A number of comments were received highlighting the benefits and sustainability of focusing development on the regional city and main urban areas:		
	13d. Concentrating housing within Bradford and other urban areas in the district allows for sustainable developments to continue to be the focus of the Core Strategy.	The comments are noted.	CSPR014 CSPR015
	13e. The main focus of housing should be adjacent to the main built up areas of the District focussing on sustainable development and those areas with the existing and planned infrastructure in place. In the	The comments are noted.	CSPR014 CSPR021

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	interests of justified and effective plan making.		
	13f. Focusing growth within urban areas can allow for the regeneration of urban areas, as well as strategic extensions which are located within close proximity to the existing public transport infrastructure such as Apperley Bridge Rail Station and at the Canal Rd Corridor and at Holme Wood - as a key target area for investment and sustainable growth.	The comments are noted.	CSPR014 CSPR015 CSPR034
	14. Bradford NW		
	14a. We will continue to support the sustainable growth of Sandy Lane, Cottingley (within Bradford North West), on behalf of our client's land interests within the District.	The comments are noted. The CSPR will take account of the land supply and site options within the different settlements and sub areas but will not itself be allocating sites.	CSPR009
	14b. Our client also retains an interest in land at Prune Park, which is a sustainable extension in North West Bradford within the Regional City sub area which remains the prime focus for housing delivery.	The comments are noted. The CSPR will take account of the land supply and site options within the different settlements and sub areas but will not itself be allocating sites.	CSPR010
	14c. Concerns about infrastructure and services in Bradford NW and the lack of information on infrastructure and services.	<p>The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to single areas such as Bradford NW and will be an issue more or less wherever the new homes are allocated.</p> <p>In line with Government guidance, the new plan will be supported by an updated Local Infrastructure Plan (LIP) to address these</p>	CSPRQ086 CSPRQ086

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		issues. The LIP is available to view on the Council's website.	
	15. Bradford SW		
	15a. We will continue to support the sustainable growth of Clayton (within Bradford South West), on behalf of our client's land interests within the District.	The comments are noted. The CSPR will take account of the land supply and site options within the different settlements and sub areas but will not itself be allocating sites.	CSPR009
	16. Bradford NE		
	16a. It is crucial that the plan recognises that focusing growth within urban areas can allow for regeneration of urban areas as well as strategic extensions which are located within close proximity to the existing public transport infrastructure such Apperley Bridge Rail station and New Line junction.	The comments are noted. The CSPR will take account of the land supply and site options within the different settlements and sub areas but will not itself be allocating sites.	CSPR014 CSPR015
	16b. Additional housing developments, on the edge of Bradford and within sustainable districts, such as Idle would be advantageously located, with excellent accessibility to the main strategic transport routes within the district as well as offering a range of sustainable transport choices.	The comments are noted.	CSPR014
	16c. Concerns about infrastructure and services in Bradford NE	The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to single areas such as Bradford NE and will be an issue more or less wherever the new homes are allocated. In line with Government guidance, the new plan	CSPRQ032 CSPRQ085 CSPRQ090 CSPRQ091 CSPRQ0104

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		will be supported by an updated Local Infrastructure Plan (LIP) to address these issues. The LIP is available to view on the Council's website.	
	16d. Concerns about flood risk and reference to past flooding events such as December 2015.	The Council's CSPR and its housing distribution will be informed by an updated level SFRA and will accord with national planning guidance by directing development to areas of lowest flood risk.	CSPRQ091
	16e. The amount of new houses being built and proposed in Idle, Greengates and Apperley Bridge seems very disproportionate to the rest of the district.	While there has been a significant amount of recent development activity in these areas this underlines that this is a sustainable location for growth of the right scale and on the right sites. However it is simply incorrect to state that the proposed level of development in the adopted Core Strategy is disproportionate. The target of 4,400 new homes for Bradford NE was actually over 3,000 lower than that which would have been the case if the district wide need had been distributed according to the sizes and spread of population across the district.	CSPRQ092
	16f. Concerns that parts of Bradford NE, in particular the Idle / Thackley area have seen enough development and concerns over loss of open space.	The Council will take into account the need to retain areas of open space in reviewing the Core Strategy and in determining which sites are allocated for housing in the Local Plan.	CSPRQ093 CSPRQ094
	17. Bradford SE		
	17a. A number of comments were received some in support and some concerned about growth in Bradford SE and in particular the urban extension at Holme Wood:		

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	17b. We will continue to support the growth of Holme Wood via the Partial Review and future Site Allocations Plan on behalf of our client, which is the only Strategic Urban Extension identified in the Core Strategy.	The comments are noted.	CSPR010
	17c. Additional housing developments, on the edge of Bradford city centre, like South East urban extension would help sustain and support a new district neighbourhood which would be advantageously located and where the Green Belt's role is weak, with excellent accessibility to the main strategic transport routes within the district as well as offering a range of sustainable transport choices.	The comments are noted.	CSPR034
	17d. Criticism is made of the Holme Wood and Tong Neighbourhood Development Plan and the proposal to build on green belt land in the Tong & Fulneck Valley. It should recognise the area as exactly the source of well-being in a Natural Space as per Policy EN1 D of the Core Strategy?	The proposal for an urban extension at Holme Wood was found sound at the Core Strategy Examination and there is no justification to make any significant changes to this proposal as part of the CSPR.	CSPR039
	17e. A number of comments have been received relating to the proposals for an urban extension at Holme Wood and the associated Bradford SE target in the adopted Core Strategy and the related merits of putting more of the development within other parts of the regional city. Comments are also made in relation to the evidence and justification provided by the Council.	<p>The Council will not be responding in detail to the merits of past decisions or the arguments and evidence made in relation to the adopted Core Strategy unless directly relevant to this review.</p> <p>The objectors to the Holme Wood and Bradford SE proposals had the opportunity to make their arguments at the Examination in Public. Their views were rejected and the plan found sound (subject to modifications) by the appointed Planning Inspector.</p>	CSPRQ114

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	17f. A reduction in the housing requirement means that an green belt releases and an urban extension at Holme Wood is no longer justified.	The Council disagrees. In carrying out the review the Council has to take into account all of the updated evidence, any changes in circumstances and any relevant changes in local, regional or national policy. The evidence still justifies a significant urban extension in this locations along with improvements to the adjoining urban areas and infrastructure improvements.	CSPRQ114
	17g. Account should be taken of recent local plan examinations, and the content of the West Yorkshire Transport Plus Strategy	The comments are noted.	CSPRQ114
	Principal Towns		
	18. Bingley		
	18a. Settlements such as Bingley are significantly more desirable locations and are therefore better placed to deliver the housing targets and accommodate the necessary level of growth.	The comments are noted.	CSPR003
	18b. On behalf of our client's land interest we will continue to support (via the Partial Review and the future Site Allocations Plan) the growth of Micklethwaite close to the Principal Town of Bingley, within Airedale sub area, where a need for housing growth remains.	The comments are noted.	CSPR012
	18c. Concerns about infrastructure and services in Bingley.	The CSPR and housing distribution will be supported by an updated Local Infrastructure Plan.	CSPRQ039
	19. Keighley		

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	<p>19a. The current distribution of new homes to Keighley should be retained in order to support, protect and enhance Keighley's role as a Principal Town in the District, as it provides a strong focus for local communities, in terms of service provision and employment and housing opportunities.</p>	<p>The Council agrees that it is important to support and enhance the role of Keighley as a Principal Town and this will be reflected in the approach to housing distribution. However in carrying out the review the Council will need to bear in mind any changes in circumstance, policy and evidence and thus it would not be appropriate to take a fixed approach to the review and rule out some changes to the housing distribution proportions or rule out increases (or decreases) in some settlement and areas.</p>	<p>CSPR043</p>
	<p>20. Ilkley</p>		
	<p>20a. On behalf of our client's land interest we will continue to support (via the Partial Review and the future Site Allocations Plan) the growth of Ilkley, which is one three Principal Towns in the Settlement Hierarchy and the main settlement within Wharfedale sub area where a need for housing growth remains.</p>	<p>The comments are noted.</p>	<p>CSPR006 CSPR007 CSPR008</p>
	<p>20a. Given the increased importance placed upon the preservation of green belts, a more positive consideration should be given to each settlement's current ratio of green belt and PDL sites before any settlement housing and employment land targets are set. In this respect, it is interesting to note, from the publication of the Brownfield register, that Wharfedale contains only three such sites and none of these are in the Ilkley settlement.</p>	<p>The Council will continue to take account of the nature and spread of potential land supply and the need to make best use of deliverable and developable brownfield land. However it will also take into account the need to support the role of Ilkley as a Principal Town and make provision for new housing in particular affordable housing. It does not consider the crude and simplistic implied approach to housing distribution made by the respondent would proved an appropriate approach not would it take adequate account of all the objectives identified above. It also ignores</p>	<p>CSPRQ115</p>

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		the fact that it is perfectly possible in some instances for green field and even green belt sites to prove sustainable options for growth.	
	21. Wharfedale		
	21a. It is important that housing delivery is balanced across the District, including in Wharfedale, to address district wide housing needs and provide a mix of high-quality housing. It is important to recognise the viability challenges in the inner urban areas of Bradford and Keighley, and therefore the Council should ensure that an appropriate proportion of housing should be allocated in the higher value areas in the Bradford.	The comments are noted.	CSPR018
	21b. Delivery of housing in the higher market value areas (such as Wharfedale) will also improve access to affordable housing through the 30% affordable housing requirement. A distribution strategy that emphasises the urban areas of Bradford and Keighley is unlikely to result in the delivery of sufficient affordable housing to meet the district's needs.	The comments are noted however the Council points out that the need for new housing and in particular affordable housing is numerically greatest in the urban areas of the district including the Regional City of Bradford.	CSPR018
	22. Local Growth Centres		
	22a. Concerns were raised about infrastructure and services for a number of the Local Growth Centres	<p>The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to single areas such as Burley and Menston and will be an issue more or less wherever the new homes are allocated.</p> <p>The CSPR will be informed by an updated Local</p>	CSPRQ067

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		Infrastructure Plan and the Council will continue to work closely with infrastructure and service providers.	
	23. Burley in Wharfedale		
	23a. There is a fundamental flaw in the manner in which Bradford Council has approached the distribution issue.	If referring to the adopted Core Strategy, the approach here was found sound by the Planning Inspectorate following an Examination in Public.	CSPRQ067
	23b. Concerns about the level of housing in Burley relating to the lack of employment, commuting, traffic and social cohesion. Conflicts with Policy TR1 and reducing the need to travel.	This is an issues and options consultation on the review of the Core Strategy - and the Council has not yet published its approach to distribution and housing targets. With regards to the proposals within the adopted Core Strategy the Council strongly disagrees with comments made – these are all points which were made during the examination into the Core Strategy and roundly rejected by the appointed Planning Inspector who found the proposals for Burley to be sound and appropriate.	CSPRQ067
	23c. Both Menston and Burley should be removed from their current place in the Settlement Hierarchy and relegated to Local Services Centres.	The Council are not currently reviewing the settlement hierarchy / Policy SC4. Even if it were these comments are simply a rehash of arguments already rejected by the Planning Inspectorate following the Examination in Public into the Core Strategy.	CSPRQ067
	23d. Burley-in-Wharfedale is identified as a Local Growth Centre in the settlement hierarchy and it therefore follows that in line with this 'growth' status it should continue to accommodate an apportionment well in excess of a level of distribution were the	The population proportionate distribution of the housing requirement is just a baseline and starting point for considering and determining the proposed approach. That proposed approach within the CSPR will take into account the position	CSPR021

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	housing requirement to be apportioned simply based on an existing population pro-rata basis.	of Burley within the settlement hierarchy and the full range of updated evidence in addition to any other changes of policy and circumstance which are of relevance. It will also take account of the current data on deliverable and developable land supply in and adjoining the settlement.	
	23e. The apportionment of housing to Burley-in-Wharfedale should factor in the 500 homes that the Council has resolved to grant planning permission for on the CEG site to the west of Sun Lane, concluding that it represents an appropriate location in which to extend into the Green Belt without unduly prejudicing its function and purposes.	The comments are noted.	CSPR021
	23f. Housing should be placed where it is needed, and this is not what the strategy proposes. Large numbers of houses in places like Burley in Wharfedale do nothing to satisfy the need for housing in the city centre.	The Council disagrees. The adopted Core Strategy did exactly that – it put the majority of homes in the urban areas where need is greatest while also providing for modest growth in sustainable settlements like Burley. This approach was found sound by the Inspector appointed by PINs. It is nonsensical to suggest that the plan is trying to satisfy the need for city centre housing in Burley. In the existing Core Strategy over 27,750 homes are allocated to the regional city including 3,500 homes within the city centre. This contrasts to just 700 new homes over a 17 year period within Burley. Moreover the comments ignore the fact that there is a role and need for housing to be provided in smaller centres such as in Burley and within Wharfedale in particular to provide for affordable housing.	CSPRQ081

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	24. Menston		
	24a. Menston is a sustainable location for housing growth with a good level of facilities and also has excellent accessibility by public transport to other destinations in West Yorkshire. The Bradford Housing Land Supply Update, published December 2018 demonstrates that there is currently limited potential for housing delivery in Menston as there are few previously developed sites which could be used as windfall and the settlement is constrained by Green Belt. It is therefore clear that to meet the housing need in Menston, new housing allocations are required.	The comments relating to the sustainable nature of Menston as a location for housing growth are noted. While the C SPR will re-set the housing target for Menston and will take into account the land supply options in the area, it will be for the Allocations DPD to determine which sites will be allocated to meet that target.	C SPR018
	24b. Greenlight Developments/Stonebridge Homes supports the current settlement hierarchy and the description and status Local Growth Centres (ala Menston) are afforded in the Core Strategy (significant contribution to the District's need for housing), and this approach to such settlements should be continued.	The comments are noted. However the C SPR also has to take into account the updated evidence base and if necessary and justified adjust housing distribution and targets accordingly	C SPR036
	24c. Sites should be considered for release where the green belt function is weak. There are often insufficient sites within settlement limits. This is particularly the case in Menston, a sustainable settlement with good levels of community facilities and services where additional housing can be accommodated. If development was focused on brownfield land in this settlement it could constrain growth and undermine the sustainable development aspirations outlined throughout the NPPF.	If there are exceptional circumstances for changes to the green belt boundary in a given settlement then it is agreed that a review of the green belt and potential focus on areas where green belt function is weak could be a key factor. Green filed sites can provide sustainable options for development. However the Council will equally look at all factors in making its allocations and will look to give priority to the use of brownfield sites where to is possible to do so.	C SPRQ075
	25. Silsden		

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	25a. No development in Silsden until the infrastructure is improved.	Such an approach would be neither justified, proportionate or in accordance with government guidance.	CSPRQ015
	25c. Too many houses are being built in Silsden without the necessary road capacity and infrastructure and with impacts on road safety.	The Council notes the comments but disagrees with the point made.	CSPRQ053
	25d. Concerns about recent development being implemented without a new bypass in place.	Recent developments have occurred following full and extensive assessment at the planning application stage. This has included looking at any infrastructure issues. The CSPR and the Allocations DPD will look at the most appropriate approach to supporting growth within Silsden.	CSPRQ053
	25e. Silsden has serious problems due to aquifer rock.	The comments are noted. The CSPR will be supported by an updated level SFRA and the Allocations DPD will the deliverability of each site.	CSPRQ043
	25f. Silsden and Steeton have had more than their fair share of development.	The Council appreciates that some areas have seen relatively high levels of recent planning applications and recent development. However it cannot automatically rule out development in such areas just because they have seen recent development. Its needs to assess afresh a range of evidence relating to land supply, options, and potential impacts.	CSPRQ101
	26. Steeton with Eastburn		
	26a. We will continue to support the growth of Steeton with Eastburn in the Partial Review and future Site Allocations Plan on behalf of our client. Steeton with Eastburn is a Local Growth Centre in Airedale Sub Area where a need for housing growth remains.	The comments are noted.	CSPR013

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	27. Local Service Centres		
	27a. Concerns were raised about infrastructure and services for a number of the Local Growth Centres.	The Council understands the concerns that are raised with regards to the capacity of services and infrastructure, including public transport capacity, road congestion and schools capacity. However these issues are not unique to single areas and will be an issue more or less wherever the new homes are allocated.	CSPRQ067 CSPRQ054 CSPRQ055 CSPRQ064
	28. Addingham		
	28a. All demographic areas should be allowed to have new development and not restricted. There needs to be appropriate scaled development in all areas of the district.	The Council approach to housing distribution will continue to follow the settlement hierarchy and focus most growth on the main urban areas while also providing for more modest levels of development in smaller and lower order settlements where appropriate and sustainable to do so.	CSPR022
	28b. The impact on landscape character and quality, designated landscapes and wildlife habitat (both within and beyond the district boundary) and the quality and value of green infrastructure assets should also be taken into account.	The comments are noted.	CSPR023
	28c. Should the level of homes across the district reduce, the level of homes proposed to be delivered in Addingham should not be reduced disproportionately as this would not meet local need. Any redistribution should not seek to remove allocations from settlements previously identified for housing growth.	In carrying out the CSPR the Council will need to bear in mind any changes in circumstance, policy and evidence and thus it would not be appropriate to take a fixed approach to the review and rule out some changes to the housing distribution numbers or proportions or rule out increases (or decreases) in some settlement and areas.	CSPR037
	29. Baildon		

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	29a. On behalf of our client's land interest we will continue to support (via the Partial Review and the future Site Allocations Plan) the growth of Baildon, which is an important Local Service Centre in Airedale sub area where a need for housing growth remains.	The comments are noted.	CSPR011
	29b. It is noted that housing allocation in Baildon was reduced on account of unevidenced opposition from Historic England. The Inspector examining the Core Strategy however supported a more precautionary approach ahead of the completion of site specific assessments. Therefore, it is crucial in reviewing this policy a review is undertaken and consulted upon to determine whether on sites in this part of Baildon do have a negative impact on the WHS or whether they could contribute towards meeting housing need in the WHS.	The Core Strategy is not a site specific document and does not allocate sites but does make decision about the spatial distribution of development based on proportionate evidence relating to the benefits of development and potential impacts. The Council will continue to take a proportionate approach in terms of the evidence base needed to support the strategic policies within the CSPR.	CSPRQ113
	30. Denholme		
	30a. We will continue to support the sustainable growth of Denholme in the South Pennines sub area on behalf of our client's land interests within the District.	The comments are noted.	CSPR009
	31. East Morton		
	31a. We would suggest that for the Core Strategy Partial Review the village of East Morton should be identified to accommodate a minimum of 140 dwellings, taking into account non-delivery in the current Core Strategy period, and rolling this forward to 2037. This provides certainty for any review of the Green Belt around the settlement. Site EM/012 should	The comments are noted. The review of Policy HO3, including the target for East Morton, will take into account all relevant changes in circumstance, policy and evidence. The issue of which sites are selected to meet the revised targets will be dealt with in the Allocations DPD.	CSPR017

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	be considered to accommodate this level of development.		
	32. Harden		
	32a. On deliverability, Bradford' Council's Growth Assessment for Local Service Centres (Volume 2; Nov 2013) assessed the suitability of land to accommodate housing growth as outlined in Policy HO3. The report identified Wilsden, Harden, Cottingley, and Cullingworth, as comprising the most amount of 'unconstrained land', to deliver housing growth; across the Local Service Centre category. Should the Council undertake a review of the Core Strategy, it is our view that Harden should be considered to deliver more growth; given its limited constraints in comparison to other settlements in this category.	The Bradford Growth Assessment was just one element of a range of evidence which was taken into account in determining the housing distribution in adopted Policy HO3. The review of Policy HO3, including the target for Harden, will take into account all relevant changes in circumstance, policy and evidence. However in the context of a reduced overall district wide need for new homes and a need to focus development in the most sustainable locations such as the main urban areas an increase in the target for Harden cannot be justified.	CSPR028
	32b. Harden PC supports the current housing requirements for the village.	Noted	CSPRQ112
	33. Haworth		
	33a. Sites should be considered for release where the green belt function is weak and that are in sustainable locations with access to transport and amenities. This is particularly the case in Haworth, a sustainable settlement with good levels of community facilities and services where additional housing can be accommodated. If development was focused on brownfield land in this settlement it could constrain growth and undermine the sustainable development aspirations outlined throughout the NPPF	If there are exceptional circumstances for changes to the green belt boundary in a given settlement then it is agreed that a review of the green belt and potential focus on areas where green belt function is weak could be a key factor. Green field sites can provide sustainable options for development. However the Council will equally look at all factors in making its allocations and will look to give priority to the use of brownfield sites where to is possible to do so.	CSPRQ076

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	33b. We ask that The Parish of Haworth Cross Roads & Stanbury be considered a special case when reviewing this Policy as it has unique historic and cultural connections set in a landscape of outstanding natural beauty that has resulted in it being an iconic international tourism destination. We request that any new housing be kept to an absolute minimum given that already developed, to protect this important unique part of the heritage of the District.	The adopted Core Strategy took full account of the need for housing growth to be achieved in a way which did not detract from the district's key environmental assets including the historic environment of places such as Howarth. This will continue to be the case in the CSPR.	CSPR020
	33c. The housing target for Haworth should be reduced from the current 400.	The comments are noted	CSPRQ054 CSPRQ55
	33d. Tourism / Recreation - there seems to be no mention of this, yet key areas of the district provide recreational paths, tourism assets (e.g. Bronte area), heritage assets (e.g. industrial museums and steam railways). These areas deserve some protection from development that will harm the income from tourism to the district.	The Core Strategy takes full account of the importance of tourism and heritage to the district and includes policies to protect and enhance those assets. The housing distribution within the Core Strategy and within this review will take account of the scope for accommodating development at levels which will both provide for need while also avoiding adverse impacts on these assets and features.	CSPRQ078
	34. Oakworth		
	34a. The site at Wide Lane provides a suitable location for residential development through the re-use of previously developed land at an edge of settlement location.	The comments are noted. However the CSPR will deal with strategic matters such as the level and distribution of development but will not allocate specific sites.	CSPR038
	35. Other Comments		
	35a. A number of comments were received relating to issues and concerns that are not directly linked to or relevant to the review of Policy HO3 including	The Council disagrees with many of the comments raised and does not consider them directly relevant to Policy HO3.	CSPRQ036

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	<p>complaints about CIL, complaints about certain planning applications, issues relating to process, how the Council carries out its role as Lead Local Flood Authority</p>		
	<p>35b. A number of comments were made which are not directly relevant to the housing distribution:</p> <ul style="list-style-type: none"> • Concerns with regards to traffic management schemes, speed bumps and bus lanes. • Need a mix of house styles • Roads are for travelling on not as car parks. • Build on brown sites, forget flats. • Used to be called town planning • Planning application at Sun Lane Burley given less scrutiny at R&A meeting than that at Bolton Woods; <p>I object to the proposed site allocation that uses Greenfield land at the side of the Leeds Liverpool canal. I am talking specifically about site references NE/065, NE/141, NE/069. I believe changing the use of this land to residential development would have a serious impact on wildlife as well as a social impact.</p> <p>Too many decisions are not made at local level and by bureaucrats.</p>	<p>Noted. No comment.</p> <p>The comments are noted however the Core Strategy is not itself identifying or allocating sites for development. This will be the role of the Allocations DPD – a separate planning document.</p> <p>The Council disagrees. The Government sets out in law and guidance the roles and responsibilities of the Local Planning Authority and how plans are produced and decisions are made and sets out extensive requirements for consultation and scrutiny of plans.</p>	<p>CSPRQ033</p> <p>CSPRQ034</p> <p>CSPRQ045 CSPRQ059</p> <p>CSPRQ036</p> <p>CSPRQ096</p> <p>CSPRQ014</p>

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	35c. The settlement distribution should be amended to reflect sustainable lifestyles, city living, and less commuting.	The comments are noted.	CSPRQ021
	35d. No more houses – we have enough.	The Council disagrees. The evidence suggests that there is a significant need for new homes due to projected population and household growth.	CSPRQ023
	35e. More information is needed to make a judgement.	The comment is noted	CSPRQ026 CSPRQ028
	35f. Housing should be built further away from the boundaries with Leeds so as to help house people from Bradford.	The location of specific sites will be determined within the Allocations DPD.	CSPRQ052
	35g. A disproportionate amount of new housing is planned for outlying areas.	If referring to the adopted Core Strategy then the Council disagrees. This is not backed up by the facts. The respondent fails to indicate what would in their view be a target which was proportionate.	CSPRQ061
	35h. The Council should identify enough land in each market area to meet the need in each market area, and to provide flexibility to ensure that need is met.	The comments are noted.	CSPRQ062
	35i. We need houses where there is good, accessible transport.	The comments are noted.	CSPRQ066
	35j. Preserve sufficient urban greenspace within each settlement to ensure easy access to open space for residents without need to travel by car. This may require housing allocations to be varied across settlements.	The Council agrees that it is essential to identify and a network of green spaces accessible to local communities and providing for formal and informal recreation. The Allocations DPD will designate and protect such spaces and identify where new provision is needed either to meet existing deficiencies or compliment areas of new housing.	CSPRQ072
	35k. General comments that green spaces should be protected:	The Council agrees that it is important that a network of green spaces are identified and	CSPRQ084

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	Please avoid green spaces for building.	protected to meet the informal and formal recreational needs of the district, to provide attractive and healthy places and support wildlife and biodiversity. The Core Strategy includes policies to meet these goals and the Allocations DPOD will identify and protect such spaces.	CSPRQ083
	35l. The review of housing distribution should be carried out based on a proper assessment of sites within the SHLAA. In my experience sites are sometimes allocated through the SHLAA process without due diligence and without collecting relevant evidence.	This is nonsense and is simply incorrect. The SHLAA has a specific role in informing plan making – it is not meant to be a full and detailed site assessment suitable to inform the determination of a planning application. It is also the case that the SHLAA only forms one element of the evidence base which is used to determine whether a site should be allocated for development within the Local Plan. The Council's SHLAA conforms to government guidance and was considered by the Inspector at the Core Strategy Examination. No criticism of the SHLAA was made by that Inspector.	CSPRQ116
	35m. SHLAA - should NOT ever identify Green Belt as suitable for development.	The SHLAA is not a policy document, it is an element of the evidence base designed to assess the deliverability and developability of potential sites. The SHLAA conforms to government guidance and it is perfectly legitimate for green belt sites to be assessed within it if sources of supply within settlements are unlikely to be sufficient to meet development needs. The SHLAA does not identify green belt sites as suitable for development, but it does identify some as <u>potentially</u> suitable for development – it	CSPRQ078

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

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		is clear that they will need to be subject to further assessment and it will be for the Local Plan to determine whether they will be released for development.	
	35n. Health - high density population leads to health issues from exhaust fumes etc.	The comments are noted.	CSPRQ078
	35o. My same comments as previously stated also apply here	It is not clear what this is referring to.	CSPRQ008
	35p. Will consideration be given to how many properties have already been built / are currently being built in each settlement in recent years? I feel some areas / settlements are being developed.	The Council cannot determine its new housing targets simply on the basis of how much development has occurred in the past or avoiding development in areas which have seen recent growth. In theory the new plan could determine that certain areas which have seen growth in the current plan are proposed for lower levels of development in the new plan. However there would have to be a specific planning related reason it indicate why an area could not make a contribution to meeting future need over the new plan period. The review of Policy HO3 has to be an evidence based analysis of how best to meet need, what reasonable options are available to do in the most sustainable way.	CSPRQ102
	35q. Why will the determination of the distribution of housing development be based on land availability (which is a consequence of the amount of money a landowner or developer believes they can acquire from it) rather than the actual needs of a particular area.	Because the Government requires that plans are sound and among the tests of soundness are whether plans are justified (based on evidence including a Strategic Housing Land Availability Assessment. The SHLAA indicates the extent and geographic spread of deliverable and developable	CSPRQ110

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
		land) and is one of the elements of evidence which is used to indicate that the plan's proposals are effective i.e. are deliverable over the plan period. The Government's guidance indicates that in order to be considered deliverable / developable land has to be available and development viable. Plans therefore cannot be based on land supply or sites which either has not been documented and identified or land which has been identified but which cannot be proven to be available.	
	35r. When taking into account the housing requirement for each settlement, account must be taken for the development that has taken place between 2013 and 2020, when recalculating the individual housing requirement for settlements. For a number of individual settlements a very significant proportion of the total housing requirement to 2030 will have already been built before 2020.	Development which has occurred between 2013 to 2020 will not count towards the new plan targets as the new plan period provides for needs between 2020 and 2037. In most cases the rate of new development has actually not matched the annual levels required in the Core Strategy however due to changes to national planning guidance any backlog of provision is no longer added to new plan targets. Where growth has occurred at a greater rate than the adopted plan envisaged the Council will still need to assess where best to accommodate housing need based on the evidence base including land availability, potential impacts, and an analysis of other reasonable options. Areas cannot be ruled out for further development simply because development has occurred in recent years unless of course there is a valid planning reason to do so.	CSPRQ107
	35s. Comments are made with regards to the evolution	The Council will not be responding in detail to the	CSPRQ108

Appendix 5: Policy HO3 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	of the housing distribution during preparation of the Core Strategy and the impact of revised HRA on modifications made to targets for Wharfedale, Bradford and Silsden.	merits of past decisions or the arguments and evidence made in relation to the adopted Core Strategy unless directly relevant to this review.	
	35t. It would make a mockery of any pretensions to environmental protection or sustainability if housing targets are reduced but the distribution of housing is not reviewed.	The issues and options documentation makes it clear that Policy HO3 which sets out the housing distribution will be reviewed.	CSPRQ111

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. Support for the phasing policy		
	1a. Review of phasing policy is welcomed in the context of the NPPF	Noted	CSPR029
	1b. The policy should be retained to allow communities to adjust to new development. Yes, needs to be phased.	Comment noted	CSPRQ006 CSPRQ058 CSPRQ083 CSPR022
	1c. Phasing of sites is essential to avoid developers 'cherry picking' peripheral sites that lead to higher profits but at the detriment of the city centre.	Comment noted	CSPRQ039
	1d. Phasing is welcome if it minimises the release of green belt sites in the first phase	Comment noted	CSPRQ107 CSPRQ115 CSPRQ116
	1e. A phased release is essential particularly if future brownfield sites become available	Comment noted	CSPR020 CSPRQ079
	2. Phasing policy concerns		
	2a. A phasing policy would constrain the Councils	The Policy has been revised to remove the	CSPR001 CSPR003

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	ability to meet housing delivery targets particularly in periods of economic uncertainty. The housing delivery test requires an action plan if delivery does not meet expectations and thus a phasing policy is not required	reference to phasing in favour of managed delivery with a number of new considerations	CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR013 CSPRQ099
	2b. Phased releases are not flexible enough cause unnecessary delays.	Comment noted	CSPRQ021
	2d. The concept of phased release of housing is obsolete due to the severe shortage of homes, particularly small units suitable for first-time buyers and the elderly. The priority should be to identify sites most suitable for these and build as soon as possible.	Comment noted	CSPRQ022
	2e. A phasing policy is only appropriate for the delivery of larger strategic sites to facilitate infrastructure but may restrain development of small and medium sites	Comment noted	CSPR016 CSPR017 CSPR018 CSPR036
	2f. Phase housing release according to need and re address the need in accordance with the housing delivery test (population forecasts)	The revision to the policy focusses on managing	CSPRQ052 CSPQR111

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	3. Justification for the phasing policy		
	3a. There is no justification for a phasing policy. 3b. The plan should identify sufficient sites to provide flexibility (paragraph 11a NPPF) and boost delivery of homes	Comment noted	CSPR036 CSPRQ062
	3c. The phasing of sites is not supported without justification/evidence. Infrastructure requirements should be addressed before sites are allocated	See above	CSPR002 CSPRQ056
	4. Phasing of larger / strategic sites		
	4a. If the phasing policy is retained, large complex (strategic) sites should be allowed to come forward sooner to ensure development is delivered in the Plan period	See response in row 1	CSPR021
	5. General comments - infrastructure		
	5a. The Council should collaborate with developers to positively bring forward infrastructure	Comment noted	CSPR017
	5b. No new development should be built until infrastructure is in place to support then. Phasing	See response in row 1	CSPR030

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	policy should be retained		CSPRQ39 CSPRQ102 CSPRQ105
	5c. Infrastructure should be provided before development- Phasing should keep pace with infrastructure provision.	See response in row 1	CSPRQ012 CSPRQ063 CSPRQ064 CSPRQ066 CSPRQ031 CSPRQ061 CSPRQ092 CSPRQ108 CSPRQ110
	5d. If the council can make effective use of brown field sites and previously used land and ensure that infrastructure and local amenities are supported then most people would accept the developments. Developments do not consider the loss of land, the loss of peace, the loss of local bonds of trust and loyalty.	Significant amounts of new development has taken place recently on previously developed land and the Council will continue to support this.- see Policy HO6.	CSPRQ014
	5e. Previous plans have shown the need to improve infrastructure including a Silsden Bypass	Comment noted	CSPRQ020

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	but now removed.		
	6. General comments		
	6a. This needs effective management	Comment noted	CSPRQ036
	6b. The phasing of housing delivery as a brownfield first policy historically has been a factor in under delivery. The take up of brownfield sites outside of the main Bradford urban area means fewer opportunities remain and fewer sites in areas of demand/need	The brownfield first policy is no longer used in Bradford. Opportunities on previously developed land still exist and the Council will continue to promote these in the Local Plan – See Policy HO6	CSPRQ070
	6c. Use brownfield sites first	Whilst the Council will seek to prioritise and support the development of previously developed land will be selected in accordance with the site assessment methodology to ensure the most sustainable options are identified	CSPRQ041 CSPRQ069 CSPRQ071 CSPRQ112 CSPRQ116
	6d. The Council should ensure the re-use of brown field land and empty buildings (mills) first and also compulsory purchase of empty houses/consider empty homes ahead of new	The Council have a brownfield register which promotes residential development and policies which promote it in the Local Plan. The Council already takes steps to bring	CSPRQ027 CSPRQ037 CSPRQ055

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	build.	empty homes back into use but this is outside of the Local Plan process.	CSPRQ089 CSPRQ090 CSPRQ100
	6e. A policy should be flexible and be able to cope with economic and political change	Comment noted	CSPR034 CSPRQ075
	6f. The policy is superfluous- If development is suitable and sustainable it should be allowed to take place to boost the 5 year supply	See response in row 1	CSPRQ016
	6g. Safeguarded land should be introduced to ensure defensible long term boundaries	Comment noted	CSPR034 CSPRQ075 CSPRQ076
	6h. Whatever approach is used it must deliver new housing stock sooner rather than later.	Comment noted	CSPRQ007
	6i. No further development, land should be released until those that have already received planning permission have been developed. Planning permissions should be implemented with enforcement	Planning approval is conditional on an implementation of 3 years. The planning system does not contain legislation to penalise (fine) developers who do not implement their permission.	CSPRQ024 CSPRQ 034
	6j. Build elsewhere in the Bradford district why	New development is proposed in all parts of the District, it is not just centred on Silsden.	CSPRQ023

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	restrict it to Silsden -	The largest proportion of new development (70%) is proposed in the Regional City. 10% is proposed in the Local Growth Centre tier in which Silsden falls.	
	6k. Knock down existing large and small council blocks of flats and build long rows of terraced housing 1940/50 style to protect the green belt	Comment noted- this is not a reasonable suggestion. The loss of significant numbers of flatted developments in favour of traditional housing which require more land per unit will in fact place greater pressure on the land supply	CSPRQ045
	6l. There needs to be some mechanism to encourage the development of "difficult " sites	Comment noted	CSPRQ048 CSPRQ112
	6m. It is important to keep the housing requirement under review using the latest data, and this requires a degree of flexibility in the approach to phasing.	Comment noted	CSPRQ051
	6n. If land does not perform the policy function and is ready, achievable and in sustainable locations it should be considered for development. Phasing should be done in a sustainable maner and not only benefit large builders and large developers	Comment noted- sites will be assessed in accordance with the site assessment methodology and the priorities of this Core Strategy	CSPRQ060

Appendix 6: Policy HO4 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	6o. All new housing should be sold before any new permissions are given	This is not a reasonable suggestion and will stifle the market with delivery not keeping pace with housing need.	CSPRQ109
	6p. The Council should compulsory purchase unviable sites and deliver homes	The Council are looking at measures to boost housing delivery which may include new Council house building. Compulsory purchase involves significant financial burden and is not always a reasonable step	CSPRQ113
	6q. Opposition to the release of larger strategic sites (Holmewood) ahead of infrastructure in the current policy	Comment noted	CSPRQ114
	6r. House prices in Bradford would have increased had there been a housing shortage- thus no justification for allocating more	Comment does not relate to the policy, rather the housing requirement issue – Policy HO1	CSPRQ117
	6s. Put the introduction into Plain English, using one sentence for each issue and one for each of its alternatives.	Comment noted	CSPRQ033

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	Maximising the Use of Previously Developed Land		
	1. Support		
	<p>1a. Support for the policy.</p> <p>The Policy is in general compliance with paragraph 117 of the NPPF and does not require significant revision.</p>	Noted	<p>CSPRQ005</p> <p>CSPRQ009</p> <p>CSPRQ015</p> <p>CSPRQ018</p> <p>CSPRQ029</p> <p>CSPRQ038</p> <p>CSPRQ039</p> <p>CSPRQ048</p> <p>CSPRQ084</p> <p>CSPRQ088</p> <p>CSPRQ090</p> <p>CSPRQ092</p> <p>CSPRQ102</p> <p>CSPRQ104</p> <p>CSPRQ112</p> <p>CSPR020</p>

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	1b. All available PDL should be used first/sufficient land is available	The Local Plan supports the development of previously developed land and prioritises development where it is the most sustainable option	CSPRQ002 CSPRQ021 CSPRQ026 CSPRQ054 CSPRQ053 CSPRQ055 CSPRQ058 CSPRQ059 CSPRQ061 CSPRQ063 CSPRQ078 CSPRQ079 CSPRQ085 CSPRQ087 CSPRQ098 CSPRQ100 CSPRQ101 CSPRQ116 CSPR021
	2. Site threshold		
	2a. The threshold should be higher to avoid building on green belt	The high housing requirement means that the current available supply is in sufficient to meet a higher target. The targets expressed are a minimum, the Council will aim to secure as much PDL re use as possible to at least reach the targets but hopefully exceed them	CSPRQ037 CSPRQ082 CSPRQ105

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	2b. The PDL target should be reduced/ revised- be informed by the amount of available land	Comment noted	CSPRQ002 CSPRQ016 CSPRQ111 CSPRQ115 CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR013
	2c. The threshold is too low, a higher proportion should be advocated particularly in the City centre and principal towns.	The targets expressed are a minimum, the Council will aim to secure as much PDL re use as possible to at least reach the targets but hopefully exceed them	CSPRQ032 CSPRQ051 CSPRQ056 CSPRQ067 CSPRQ071
	2d. The policy is inconsistent in that the target for the Local Growth Centres is too low (15%) in comparison with other areas	The policy is founded on the available land supply. With the Local Growth Centres the overall supply is lower comparatively to the housing figure and as such it is correct that	CSPRQ074

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
		the proportion should be lower.	
	2e. The destruction of green field sites is shameful, the policy should be stronger	Comment noted, this is not relevant for this policy question	CSPRQ025 CSPRQ081 CSPRQ083
	2f. The setting of a % target is not robust enough and will not ensure development on brownfield sites	The policy will allow monitoring. Other policies in the Core Strategy support redevelopment and regeneration initiatives	CSPRQ108
	2g. The targets should be realistic and achievable and be more flexible allowing for issues such as contamination which would make a site unviable.	Comment noted. The targets have been reviewed	CSPRQ022 CSPRQ016 CSPR004 CSPR030 CSPR044
	2h. NPPF does not set targets for the re use of PDL and as such should be removed	The NPPF re affirms that PDL should be promoted. Bradford has a PDL land supply and it is correct that targets should be set to allow monitoring to take place	CSPRQ099 CSPR003
	3. Historic delivery of PDL		
	3a. We must acknowledge that PDL targets have never been met	Good progress has an continues to be made, see Housing Land Supply Update (Dec 2018)	CSPRQ033

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	3b. The policy should acknowledge that PDL targets have never been met	The degree to which the PDL targets in the adopted Core Strategy have been met are referred to in the Housing Land Supply Update (Dec 2018). Good progress has been made to dates and the Allocations DPD will look to identify as many sites as possible on further PDL sites, subject to supply and their merits against other sites. Having a target and an approach to encourage the re use of such sites is correct and will allow the Council to monitor progress.	CSPRQ016
	3c. Past levels of delivery over the last 20 to 25 years should be addressed to determine what is possible	Comment noted. Delivery over such a long time period is not practicable	CSPRQ016 CSPRQ070
	4. Use of sustainable sites		
	4a. Sustainably located greenfield sites should not be overlooked if they are deliverable.	The lower case text sets out that a sites status as PDL is not the only factor in the allocation of sites	CSPRQ007 CSPRQ011 CSPRQ075 CSPR002 CSPR022 CSPR036

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	5. General comments		
	5a The policy should clarify that PDL and brownfield are the same- see NPPF 2018 definition	Noted	CSPR016 CSPR021
	5b. Agree to reuse of PDL for housing but former employment land should be re used for employment	Historic employment sites are sometimes not in the right area for new businesses and are larger than required for operational reasons. Sites will be assessed and considered for all future forms of development and the most appropriate use selected at site allocations stage. The Government state in the NPPF that employment sites should not be reserved for this use if there is no prospect that this use will be taken up. The primary need is for homes and the avoidance of unused land such as in the green belt if PDL is available and unneeded	CSPRQ034 CSPRQ069
	5c. Developers should be incentivised to deliver PDL	Comment noted	CSPRQ080
	5d. Use mills for conversion into elderly persons flats	Comment noted	CSPRQ033
	5e. Re use and allocate land protected for industry.	Comment noted. The Council are in the process of reassessing the Employment Land	CSPRQ036

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
		supply to determine the supply which can be identified for an alternative use	
	5f. All new housing should be on PDL without any destruction of green fields- including PDL which is green belt	Comment noted.	CSPRQ014 CSPRQ072 CSPRQ107 CSPRQ109 CSPRQ112 CSPRQ113
	5g. New housing need seems to be unquestioned and based on assumptions, projections and guesswork	The role of the Council is to determine its housing needs based on forecasts and projections as set by central government. This is the correct and legally compliant approach to meet the requirements of the NPPF	CSPRQ014 CSPRQ031
	5h. In setting targets, account should be taken of the potential housing which could be accommodated in the Districts underused mills	Numerous sites containing underused buildings and associated land have already been assessed in the SHLAA and contribute toward the potential available supply. This supply will be further assessed to determine which sites will be included in the Site Allocations DPD.	CSPR004

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	5i. The policy should ensure that in villages where commercial activity is failing that housing is developed first	Comment noted	CSPRQ052
	5j. The policy should recognise that PDL is not always a sustainable option when they have reverted to wildlife habitats or have other environmental constraints or are needed for public open space	Agreed	CSPRQ070 CSPR016
	5k. Sufficient sites are available in some locations to negate the need to use none PDL sites	All sites will be assessed to ensure that the Site Allocations DPD provides a sufficient supply of land for development. Where possible, sustainable and viable, PDL sites will be allocated for development.	CSPR017
	5l. Identified targets should only apply to the settlement hierarchy rather than individual settlements	This is already explicit in paragraph 5.3.99 but further rewording applied to make it further clear	CSPR021
	5m. Over reliance on PDL could have implications on wider economic growth contrary to para 117 of the NPPF and footnote 44	Targets adjusted to recognise the reduction in the supply of such sites	CSPRQ113C SPR021 CSPR032 CSPR033 CSPR037

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	5n. It is appropriate that the Local Growth Centres should have the lowest PDL threshold as these settlements are tightly constrained by green belt which limits their ability to deliver growth	Comment noted. Targets have been readjusted to recognise this	CSPR021
	5o. Paragraph 138 of the NPPF states that first consideration should be given to land that is PDL and/or well served by public transport. Green belt PDL should be sequentially preferable to other PDL in the urban area	Comment noted	CSPR016 CSPR037 CSPR044
	5p. The extent to which previous brownfield land development has led to the loss of settlement or neighbourhood character or town cramming (loss of character) should be considered	Comment noted. The supply of available sites which are PDL is and will continue to be assessed. The site Allocations DPD will address the issues identified in the site selection process	CSPRQ016 CSPRQ070
	5q. Adequate allowances for delivery should be taken into account for large or complex brownfield sites	Comment noted	CSPRQ070
	5r. There needs to be some recognition of the fact that the development of certain brownfield sites/locations may result in less sustainable outcomes.	Site suitability and sustainability against others will be part of the detailed site assessment work for the Site Allocations DPD	CSPRQ070 CSPR032 CSPR033 CSPR037

Appendix 7: Policy HO6 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent ID
	5s. The Council should encourage developers to take on PDL. By removing the 20% vat on brown field developments, you would rewarding developers who are prepared to redevelop such land and developers should be penalised for putting forward applications to develop green belt/grazing land.	This would need to come from central government policy. The Council do not determine VAT levels	CSPRQ109 CSPRQ116 CSPRQ117 CSPRQ110
	5t. How is the council going to facilitate the meeting of these targets on PDL if it is only relying on market forces to secure such developments? Is the council going to use any of this land to provide much needed social housing?	The sites will be identified in the Site Allocations DPD	CSPRQ110
	5u. All homes should have enough space for children to play	Comment noted. Not all homes will accommodate children – elderly person provision, 1 bed flats in the city centre etc.	CSPR043

Appendix 8: Policy HO8 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. Retain existing Policy HO8		
	1a. general support for policy Ho8 on housing mix	Noted. The C SPR will allow the council to ensure the policy is fully in line with latest national policy requirements and reflects the latest evidence of housing need and demand	C SPRQ007 C SPRQ012 C SPRQ015 C SPRQ067 C SPRQ098 C SPRQ113
	1b. Policy HO8 is sound and in line with national policy and therefore does not require reviewing.	Noted. The C SPR will allow the council to ensure the policy is fully in line with latest national policy requirements and reflects the latest evidence of housing need and demand.	C SPR003 C SPR024 C SPR032 C SPR033 C SPR037
	2. Flexibility of Policy HO8.		
	2a. Policy HO8 should be flexible and not overly prescriptive	Noted. The C SPR will allow the council to ensure the policy is fully in line with latest national policy requirements and reflects the latest evidence of housing need and demand. However It is not considered appropriate to set specific requirements on housing mix through the strategic policy.	C SPR003 C SPR007 C SPR008 C SPR009 C SPR010 C SPR011 C SPR013 C SPR006 C SPR007 C SPR008 C SPR009 C SPR010

Appendix 8: Policy HO8 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
			CSPR011 CSPR013 CSPR017 CSPR020 CSPR044 CSPRQ76 CSPRQ099
	2b. BMDC should provide each Housing Market Area with their own specific housing mix to replicate the differences within the region. This will allow for positive, effective and justified plan making throughout the plan period.	Noted. The council will consider the latest evidence in the SHMA and if there is any justification for setting housing mix priorities by sub area. However it is not currently considered appropriate to set specific requirements on housing mix through the strategic policy to enable flexibility to respond to local market need and demand and site specific issues.	CSPR014 CSPR036
	I would only question how one defines the most appropriate mix for each area/community. Bungalows? they can be attractive for some but are often poorly located when it comes to a sustainable location	The council will consider the need and demand for a range of housing, in the latest SHMA? This will include engagement with key stakeholders and evidence through a new household survey. However it is not currently considered appropriate to set specific requirements on housing mix through the strategic policy to enable flexibility to respond to local market need and demand and site specific issues.	CSPRQ016
	3. Evidence		

Appendix 8: Policy HO8 - Comments Received and CBMDC Response

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	3a. Policy HO8 should be informed by latest evidence in the SHMA.	The council will consider the need and demand for a range of housing, in the latest SHMA.	CSPR002 CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR013 CSPR023 CSPR014 CSPR036 CSPR041 CSPRQ056 CSPRQ060 CSPRQ085 CSPRQ112 CSPRQ116
	3b. Regardless of the SHMA the housing mix will need to reflect the population and population projections. Yet it should also reflect the ambition for Bradford to become the fastest growing economy over the coming decade the housing mix must include larger homes for families as well as starter homes so the younger generations are able to stay within the Bradford district.	The council will consider the need and demand for a range of housing, in the latest SHMA	CSPR014 CSPR036
	3c. I'm sure the local housing authorities surveys	The council will consider the need and	CSPRQ006

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	are more accurate than anything government or LA Can guess at ! Listen to charities and housing associations!	demand for a range of housing, in the latest SHMA. This will include engagement with key stakeholders and evidence through a new household survey.	
	3d. Those responsible should simply ensure they are acting on all relevant and accurate information - not guesses, not projections on pretty graphs. They should consider all the "what ifs ..." and all the "trade offs". And they should be wary of "experts" who have no skin in the game". And all decisions should be made at the lowest, local level - not dictated to by distant politicians and those with pecuniary interest; ie the people who will have to live with any developments.	The council will consider the need and demand for a range of housing, in the latest SHMA. This will include engagement with key stakeholders and evidence through a new household survey. Policy Ho8 allows housing mix to be identified where justified by more local evidence through Neighbourhood plans	
	3e. Build what is needed; not what the developers want (usually3-5 bedroomed houses). I would rather see beautifully layed out terraces (like the old style) rather than alot of these Barratt style estates, with no sole.	Policy Ho8 will help ensure an appropriate mix and range of housing is provided to meet current and future needs.	CSPRQ021
	3f. How is the survey going to accurately determine local housing needs? Current development in my area seems only to be based on what the developer wants to build (family housing) as oppose to the local need for elderly and affordable housing.	The council will consider the need and demand for a range of housing, in the latest SHMA. This will include engagement with key stakeholders and evidence through a new household survey. Policy Ho8 sets out that housing mix on developments will need consider the evidence in the latest SHMA and any other robust local evidence of housing	CSPRQ110

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		need	
	4. Housing Mix		
	4a. comments of general support for housing mix to meet local need	Noted. Policy Ho8 of the Core Strategy requires an appropriate mix of house types sizes and tenures. The council will consider the need and demand for a range of housing, in the latest SHMA.	CSPRQ048 CSPRQ049 CSPRQ054 CSPRQ058 CSPRQ059 CSPRQ060 CSPRQ066 CSPRQ087 CSPRQ107 CSPRQ109 CSPRQ113
	4b. BMDC must be able to accommodate a range of people including young professionals, elderly and those unable to afford market values.	Noted. The council will consider the need and demand for a range of housing, including housing for older people in the latest SHMA	CSPR014 CSPR036
	4c. general comments on the need for smaller properties including level access properties and bungalows for older people to downsize into	Policy HO8 supports a mix of house types, styles and tenures. The council will consider evidence on the need and demand for a range of housing, including housing for older people in the latest SHMA. This will include the need for accessible properties and housing for older people.	CSPRQ009 CSPRQ002 CSPRQ043 CSPRQ067 CSPRQ100 CSPRQ102 CSPRQ105 CSPRQ107 CSPRQ108 CSPRQ112

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	there is already a great mix of housing in silsden and lots for sale so no demand for extra	Noted. The council will consider the need and demand for a range of housing, in the latest SHMA. Policy Ho1 Housing requirements and Ho3 Housing distribution will consider how many new homes are required to be built to meet identified needs in the CSPR.	CSPRQ020
	4d. The required mix should be subject to ongoing review, in order to identify changing demographics such as smaller family sizes.	Noted. The council will monitor the adopted Local plan and review policies at least every five years in line with national planning policy.	CSPRQ022
	4e. I think you'll find that what's needed across the district is affordable housing and starter family home. The policy to provide 30% affordable housing is completely flawed in the context of its definition. This was noted in the council's own ARC report, which is the only definitive report about the same. I'd like to see Council, bite the bullet and be proactive in this area. Affordable housing is that which meets the needs of the districts 'working class,' it's not this definition, 'affordable homes should cost no more than 80% of the average local market rent.' It might seem obvious, but getting a foot on the ladder requires an joint income of £50,000 would yield a mortgage of between £125,000 and £175,000, that's my definition of affordable housing - a house costing no more than £175,000. UK average income £27,600, whilst the Bradford's districts average is	Noted. Affordable housing is defined nationally in the NPPF/ Policy HO11 will consider affordable housing issues in the CSPR. Policy HO8 supports a mix of house types, styles and tenures	CSPRQ036

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	only £21,005.		
	4f. A local housing need survey is imperative. Smaller affordable housing in Bradford and Keighley are a priority as this is where the jobs are or should be. They are also best placed to support the commute to Leeds etc	Noted. Policy HO11 will consider affordable housing issues in the CSDP. Policy HO8 supports a mix of house types, styles and tenures. Policy HO8 will consider evidence in the latest SHMA which includes a new household survey of the district. Policy HO8 sets out that housing mix on developments will need to consider the evidence in the latest SHMA and any other robust local evidence of housing need	CSDPQ037
	4g. In my opinion Bradford council appears to be allowing developers to build increasing numbers of 'luxury' homes, presumably to gain more council tax, while ignoring the need for sufficient affordable housing	Noted. Policy HO8 of the Core Strategy requires an appropriate mix of house types sizes and tenures. Policy HO11 addresses affordable housing in the CSDP.	CSDPQ040
	4h. TOWER BLOCKS AND COMMUNAL LIVING IS NOT A ANSWER	Noted. Policy HO8 requires an appropriate mix of house types sizes and tenures. The CSDP of Policy HO8 will consider evidence of housing need and demand in the latest SHMA.	CSDPQ045
	4i. Haworth, cross roads and Stanbury area should only build housing that meets its requirement thus is for older people and as such the location to the centre, shops and other amenities is of paramount importance	Noted. Policy HO8 requires an appropriate mix of house types sizes and tenures. The CSDP of Policy HO8 will consider evidence of housing need and demand in the latest SHMA. This includes the needs of housing for older people and accessible homes.	
	4j. the mix of housing ought to be determined with	Noted. Policy HO8 requires an appropriate	CSDPQ067

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	consideration to the nature of the settlement in question, its demographic profile and its opportunity to provide a range of employment opportunities, without generating increased commuter traffic.	mix of house types sizes and tenures. The CSPR of Policy HO8 will consider evidence of housing need and demand in the latest SHMA This includes the needs of housing for older people and accessible homes. Policy HO8 sets out that housing mix on developments will need consider the evidence in the latest SHMA and any other robust local evidence of housing need.	
	4k. The current mix appears to be unbalanced, towards family housing.	Noted. the comment is not support by any evidence of housing need or demand. Policy Ho8 requires an appropriate mix of house types sizes and tenures. The CSPR of Policy HO8 will consider evidence of housing need and demand in the latest SHMA	CSPRQ088
	4l. not enough thought appears to be given to the mix of houses in the surrounding area to ensure facilities and developments are developed with everyone in mind	Noted. Policy Ho8 requires an appropriate mix of house types sizes and tenures. The CSPR of Policy HO8 will consider evidence of housing need and demand in the latest SHMA	CSPRQ090
	4m. Yes Policy HO8 should be revised to reflect the evidence also the mix in different settlements and wards should reflect the needs of their communities and their population profiles; different parts of the District have different housing needs.	The CSPR of Policy HO8 will consider evidence of housing need and demand in the latest SHMA. Policy Ho8 sets out the strategic priorities and requires an appropriate housing mix on developments that will need consider the evidence in the latest SHMA and any other robust local	

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		evidence of housing need. Criteria D of Policy Ho8 sets out that Specific guidance on housing mix on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans.	
	4n. policy should also seek to apply to mix tenures and value arranges across large sites to mix communities. In particular policy should pick large sites of mono tenure housing or low value housing and seek to include a greater element of higher value and private housing in order to provide better mixed communities and tenures. In many cases the municipalities house values are relatively affordable, a policy could be considered akin to Manchester where market housing at the lower end of the value range could be considered affordable in order to increase supply.	Comment noted. Policy HO8 requires an appropriate range and mix of housing on larger sites. Smaller housing may be more affordable but would need to meet the NPPF definition to be classed as affordable housing.	CSPRQ113
	5. Support higher standards		
	5a. Strongly support retaining higher standards to support sustainability and quality of life. The policy review should also consider setting higher standards than the minimum set in building regulations. Thus ensuring new housing development achieves lower emissions and aspires to be carbon neutral.	Noted. Housing quality will be set out in Policy HO9. Standards must be set in line with national policy. NPPF para 50 states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards	CSPR0230
	5b. all housing should be accessible along lifetime	Noted. The council will consider the need and	

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	home principles to ensure longevity and best value	demand for a range of housing, including accessible homes in the latest SHMA. Housing quality will be set out in Policy HO9. Standards must be set in line with national policy. NPPF para 50 states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards	
	6 Need for affordable Homes		
	6a. General comments on the need for affordable housing	Noted. The council will consider the evidence on affordable housing need in the latest SHMA. This will be considered through Policy HO11 in the CSPR.	C SPRQ028 C SPRQ029 C SPRQ032 C SPRQ037 C SPRQ038 C SPRQ039 C SPRQ040 C SPRQ054 C SPRQ060 C SPRQ061 C SPRQ073 C SPRQ080 C SPRQ082 C SPRQ086 C SPRQ089 C SPRQ093 C SPRQ098 C SPRQ102

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			CSPRQ116
	6b. More social housing is needed not affordable homes. There are too many bedsit flats and not enough homes with rent that's affordable. The building of social housing on mass will mean private rents will have to fall in line with social housing allowing people to afford a combatable life in the city with more disposable income to spend Again it's social housing that is needed not affordable homes	Noted. The council will consider the evidence on affordable housing need in the latest SHMA. This will be considered through Policy HO11 in the CSPR.	CSPRQ028
	6c. Ok, but be careful in pushing for low grade grade affordable homes on developments with larger houses as this might stop the sale of the larger houses on that site.	Noted. The council will consider the evidence on affordable housing need in the latest SHMA. This will be considered through Policy HO11 in the CSPR.	CSPRQ029
	6d. I think you should looked the findings. However, I think there is more call for smaller affordable homes for 1/2 people and families	Noted. The council will consider the evidence on affordable housing need in the latest SHMA. This will be considered through Policy HO11 in the CSPR.	CSPRQ032
	7. Specialist housing		
	7a. Increasing demand from younger adults and the more elderly suggests that more specialist accommodation is required and this should free up family housing.	Noted. Policy Ho8 will help ensure an appropriate mix and range of housing is provided to meet current and future needs. This will be informed by evidence in the latest SHMA including the need for specialist housing,	CSPRQ051
	8. General comments		
	8a. Ensure appropriate parking is allowed	This comment is not considered relevant to	CSPRQ030

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	especially in family homes	Policy HO8. Parking issues will be considered through other Local Plan policies in the CSPR.	
	8b. building high tax band properties on the green belt is nothing short of a massive white elephant, distracting from the council's pathetic inability to collect council tax from the properties within the region, especially the city wards. Likewise it's a fairy tale to assume that these properties to be built within the green belt will attract any investment when there is a failing transport infrastructure and highly congested roads.	Noted. Policy HO8 does not consider housing mix on whether the land is green belt or not.	CSPRQ031
	8d. The policy should also include a policy change on extensions to stop the conversion of smaller homes into very large homes which destroy the original outcomes from the plans.	Noted. It is not considered appropriate to include the suggested policy in Policy HO8 housing mix . The Householder SPD sets out guidance on how to design extensions to new homes without harming the amenity of adjacent residents.	CSPRQ052
	8e. I think older or vulnerable people should be housed away from large families which can be noisy and impact on quieter people in a very negative way.	Noted. Policy Ho8 will help ensure an appropriate mix and range of housing is provided to meet current and future needs.	CSPRQ063
	8f. Housing density should be maximised.	Noted. Policy HO8 supports high quality flats as a strategic priority. Density will be considered through Policy HO5 of the CSPR.	CSPRQ072
	8g. There are numerous properties around the district that are of good size but in need of	Noted. This comment related to the housing requirement which is considered through	CSPRQ087

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	attention, without which they will become derelict, could effort be placed into these rather than constantly building more and more houses	Policy Ho1 of the CSPR.	

Appendix 9: Policy HO9 - Comments Received and CBMDC Response

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	1. General comments		
	1a. Does anyone actually ask what "ordinary" people actually want? Is everything left up to councillors, bureaucrats and developers to foist houses on people? The quality has to suit the requirements and peoples' needs wherever possible.	Comment Noted.	CSPRQ014
	1b. Bradford currently has no minimum space standards . Are you referring to Passivhaus, AECB Silver Standard, building regulations? which have improved significantly in recent years incorporating features from the Code for Sustainable Homes level 3 and 4. or Lifetime Homes standard, the Building for Life publication, NHBC, HCA Design and Quality Standards, Wheelchair Housing Design Guide or others. Developers, builders, private landlords/client and public clients like RSLs need guidelines for health and well being to be a minimum standard. pick one and stick to it.	Noted. Policy Ho9 will refer to nationally described standards as set out in the NPPF.	CSPRQ026
	1c When housing companies are constantly stating that developments are no longer cost effective if required to build infrastructure yet give out bonuses such as persimmons did it should be taken with a pinch of salt	Noted. The council support high quality housing and design standards. However, all Local plan standards must be considered in line with the evidence requirements as set out in the NPPF and PPG.	CSPRQ028

Appendix 9: Policy HO9 - Comments Received and CBMDC Response

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	Developers are walking all over the council and it's about time higher standards in all areas are upheld		
	1d. All new homes should have fiber broadband laid at the building stage, it should be considered an essential like water, gas and electric.	Noted. The comment relates to infrastructure which is considered in the ID policies of the CSPR.	CSPRQ029
	1e. With questionable responses from the council regarding retrospective planning permission. A low use of the cycle lanes within the district. Questionable responses to illegal activity around parking and road use. Any development is predicated to fail and both infrastructure, policing and enforcement are clearly non evident.	Noted. Comment not considered relevant to Policy HO9.	
	1f. Housing quality is important but need to look at the quality of housing and quality of life for existing residents. Many people in terraced houses have little outdoor space and struggle to store bins and recycling bins. Also in a country setting these are unsightly. If these standards are to be applied to new housing which is admirable, it should not be at the detriment of people in older housing stock as they too have a need for quality of life and many have paid Council tax and contributed	Comment noted. The council support high quality housing and design standards. The council agree this applies to existing areas. The CSPR includes regeneration priority areas and further guidance will be set out in the housing design guide SPD	CSPRQ058

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	for well over 50 years.		
	1g. Building regs and government oversight! Hasn't done much since the Grenfell disaster, there's still a majority of high rises without sprinkler systems	Comment not consider relevant to CSPR.	
	1h. There is current evidence that housing quality is often taking account of fashionable concepts (such as hypothetical access to cycle-ways) but becoming deficient in the true priorities such as adequate drainage, protection from flood risk and the prevention of criminal activity. It is important that "quality" focuses on aspects which are permanent and have impact on people's daily lives, such as adequate insulation to reduce energy consumption, and sufficient space between building to get their wheely-bins from the back to the front of the dwelling. It is folly to imagine that a majority of residents in outlying communities are going to cycle to work or use a bus to commute when the service runs only hourly.	Noted. flood risk issues are considered in Policy EN7 of the CSPR. The council intend to provide further deign detailed design guidance in the hosing design guide SPD.	
	1i. To keep areas looking clean and tidy, then higher standards are needed. Every new development looks ok on paper but once built, cars are parked on pavements because the	Noted. The council indent to set out further detailed design guidance in the housing design guide SPD.	CSPRQ100

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	roads are too narrow and there are not enough parking places etc. Too many houses are squashed onto each site. There is no space between even the "detached" houses.		
	1j. It would seem this policy is ignored by almost all developments. High standards of construction - it is obvious that one approval has been given the terminology "high standards" is ignored. From what I have seen the quality of construction by many of the major developers is appalling. There concern is not the quality of the development but maximising profit - that equates to poor methods of work, poor quality materials. Private Space ? - when properties are built with distances between of just single digit meters that doesn't leave much room for private space. If private space means erecting 6Ft high fencing around a 25m2 garden that looks more like a compound.	Noted. The council support high quality housing and design standards. the council indent to set out further detailed design guidance in the housing design guide SPD.	
	2. Standards need to reflect evidence of need and viability		
	2a. If the Council wishes to adopt the higher optional standards for accessible homes and the national space standard homes the Council should only do so by applying the criteria set out in the PPG, including evidence	Noted. The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing need and viability.	CSPR002 CSPR006 CSPR007 CSPR008 CSPR009

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	of viability and need.		CSPR010 CSPR011 CSPR013 CSPR017 CSPR032
	2b. Go for the lowest legal requirement to keep costs to buyers down	The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing need and viability. However the council support high quality housing and design standards	CSPRQ037
	2c. Pile high, sell 'em for maximum profit. That is just what builders are doing. Build quality seems to be the least of their worries.	The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing need and viability. However the council support high quality housing and design standards	CSPRQ038
	2d. Standards should not be lowered.	The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing need and viability. However the council support high quality housing and design standards	CSPRQ043
	2e. It has to be viable otherwise we just shift the cost - and have to pay for adapting houses later Poor design & quality means	Comment noted This has been considered as part of the evidence of need and viability. The council will review the option standards for accessible	CSPRQ066

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	people are less committed to their accommodation & more likely to not look after them	homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing and viability	
	2f. Not sure whether this includes improving accessibility and the road network.	The Policy refers to the accessibility of dwellings by occupants as set out in the national optional housing standards	CSPRQ086
	2g. It is very disappointing that the Council are saying that they need to consider whether introducing standards in excess of current planning and building regulations can be justified and is viable. The starting point should be assessing the current standards and whether there is a need in Bradford to increase such requirements. Once this work has been undertaken, only then should the Council look at whether introducing such standards is viable and therefore justified. It appears as if the Council have made the decision already and are now retrofitting the evidence to justify it. Also, any viability testing needs to incorporate all current and new policy requirements at a detailed level alongside affordable housing and CIL requirements. Our fear is that if the Council get the viability wrong and the policy gets adopted, then unless there is sufficient	Noted. The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on both housing need and viability. Any standards proposed based on need will be tested as part of the whole plan viability assessment alongside affordable housing and CIL.	CSPRQ099

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	flexibility within policies seeking higher standards, the focus for debate will be the level of affordable housing on future housing schemes. Local Planning Authorities appear to be quick to seek enhanced planning and building regulation standards without thinking of the long game, if such requirements render housing development unviable. Ultimately it could be affordable housing delivery that could suffer.		
	2h. Viability should be considered over the long rather than	Noted. the whole local plan and CII viability assessment will consider the viability of any standards in line with national PPG.	CSPRQ108
	3. General support for the high housing and design standards		
	3a. general support for the high housing and design standards	Noted. The council support high quality housing and design standards. However, all Local plan standards must be considered in line with the evidence requirements as set out in the NPPF and PPG.	CSPR003 CSPRQ007 CSPRQ009 CSPRQ006 CSPRQ015 CSPR030 CSPRQ032 CSPRQ021 CSPR034 CSPRQ040 CSPRQ036 CSPRQ052

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			C SPRQ056 C SPRQ059 C SPRQ063 C SPRQ064 C SPRQ070 C SPRQ073 C SPRQ085 C SPRQ089 C SPRQ098 C SPRQ107 C SPRQ108 C SPRQ109 C SPRQ111 C SPRQ114 C SPRQ116
	3b. General support for providing homes that are suitable to meet the needs of older people and disabled people	Noted. The council are proposing to set standards for accessible and adaptable homes and space standards that go beyond the minimum required by building regulations.	C SPR002 C SPR006 C SPR007 C SPR008 C SPR009 C SPR010 C SPR011 C SPR013 C SPR017 C SPRQ041
	3c. general support for national space	Noted. The council are proposing to set standards	C SPRQ080

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	standards	for accessible and adaptable homes and space standards that go beyond the minimum required by building regulations	CSPRQ113
	4. Need for flexibility		
	4a. concern that an inflexible policy approach could result in viability issues and will affect the deliverability of sites. Suggest that a flexible approach should be taken, with consideration given to tenure and market area, to ensure that the identified housing need can be delivered across the district.	Noted. The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing and viability. It is intended that the policy will allow flexibility for exceptional site specific factors, such as flood risk, site topography or viability considerations.	CSPR044
	4b. Housing design policies should not be overly prescriptive and or undermine the viability of the development, which in turn impacts on the deliverability of housing – a key objective of Government (Paragraph 59 of the NPPF). the proposed housing design guide SPD should be drafted so that it was consistent with the requirements of this policy. However, the timeframes currently set out for this SPD in the Local Development Scheme do not suggest this will be the case, as it is envisaged the SPD will come forward in advance of the Core Strategy Partial Review.	Noted. The council agree that strategic design policies should not be overly prescriptive. Further guidance on design quality will therefore be set out in the design guide SPD. It is currently intended that the draft design guide SPD will be published for comment alongside the next stage of the Core Strategy Partial Review.	CSPR036 CSPRQ016
	4c. In communities with conservation areas,	The council consider that the design quality of	

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	<p>outdated or inordinately expensive options are demanded regardless of their quality and desirability. Whilst important, we would ask for greater flexibility in allowing sympathetic, but more affordable / desirable materials be considered adjacent to conservation areas to facilitate more truly affordable housing, without a reduction in quality.</p>	<p>housing in conservation is an important consideration, including the types of materials used in accordance with Policy EN3.</p> <p>It is not considered appropriate to set any local design requirements through strategic policy HO9 which set out the general principles to achieving good design. However Policy HO9 does allow for further non-strategic policies and guidance on housing quality and design on an area or site basis within Neighbourhood Plans.</p>	
	<p>4d. Housing quality is a little like good design - what does it mean?. Each site is different and its optimum development will also be different and the application of broad standards is NOT appropriate. Yes there should be ambitions but not rigorous "standards", which may not be appropriate on a given site, may make it unviable although much needed</p>	<p>The council agree that strategic design policies should not be overly prescriptive. Further guidance on deign quality will therefore be set out in the design guide SPD.</p> <p>The council are proposing to set standards for accessible and adaptable homes and space standards that go beyond the minimum required by building regulations The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing and viability.</p>	CSPRQ016
	<p>4e. national space standards should be a</p>	<p>Noted. The council are proposing to set standards</p>	CSPRQ060

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	<p>minimum requirement for larger sites and larger developers. bespoke and smaller sites should have relaxations to support local developers</p>	<p>for accessible and adaptable homes and space standards that go beyond the minimum required by building regulations The council will review the option standards for accessible homes and space standards in line with national planning policy requirements and PPG and the latest evidence on housing and viability. It is not considered that smaller sites should be exempt from any justified housing standard requirement in Policy HO9</p>	
	<p>5. Climate change and zero carbon housing standards</p>		
	<p>5a. Will the council insist that all new-build properties are built to zero carbon emission standards, as per the findings published by the Committee on Climate Change in their report "UK housing: fit for the future" of 21 February 2019?</p>	<p>The council will encourage and support new residential development to achieve high sustainable design and construction standards. However, It is not considered that this approach would be in line with national planning policy in the NPPF para 50 that states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.</p>	<p>CSPR039</p>
	<p>5b, electric car charging facilities in all houses and for the community solar panels on all newbuilds</p>	<p>The council will encourage and support new residential development to achieve high sustainable design and construction standards. The council will seek to include a policy on electric car charging in residential developments in the CSPR. However, It is not considered that the</p>	<p>CSPRQ020</p>

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		<p>approach to requiring solar panels on all newbuilds would be in line with national planning policy in the NPPF para 50 that states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.</p>	
	<p>5c. like to see Council and developers practice what they preach and include the following in building regulations: Vehicle charging points for every two houses - the precedent was set in Bingley. Solar Panels on all new builds. Triple glazing.</p>	<p>The council will encourage and support new residential development to achieve high sustainable design and construction standards. The council will seek to include a policy on electric car charging in residential developments in the CSPR. However, It is not considered that the approach to requiring solar panels on all newbuilds would be in line with national planning policy in the NPPF para 50 that states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.</p>	
	<p>5d. Compared with much of Europe the quality and energy efficiency of new build housing in Britain is poor. The plan should take any steps it can to improve quality and aim for carbon neutral/zero emission housing</p>	<p>The council will encourage and support new residential development to achieve high sustainable design and construction standards. However, It is not considered that the approach would be in line with national planning policy in the NPPF para 50 that states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical</p>	<p>CSPRQ048 CSPRQ049</p>

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		standards.	
	5e. Energy efficiency and the environmental impact are surely justifiable reasons to be included in the standards	Any approach should be in line with national planning policy in the NPPF para 50 that states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	CSPRQ102
	5f. Water standards, re cycle is rarely considered.	Noted the council do not currently intend to set higher standards in relation to water. Comment does not include any further evidence to justify this.	CSPRQ108
	5g. The adoption of Passive House standards by the council will go a long way to delivering sustainable development which is a strategic priority in the NPPF. Will CBMDC be adopting these house building standards?	The council will encourage and support new residential development to achieve high sustainable design and construction standards. However, It is not considered that the approach would be in line with national planning policy in the NPPF para 50 that states any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	CSPRQ110
	5h. Harden Parish Council believes that higher standards are required to meet the aim of zero carbon housing (HO9 B) and building communities which are resilient to climate change.(para. 3.30 Core Strategy). BMDC should do all it can to encourage better insulation, power generation and ground	The council will encourage and support new residential development to achieve high sustainable design and construction standards. However, It is not considered that the approach would be in line with national planning policy in the NPPF para 50 that states any local requirements for the sustainability of buildings should reflect the	CSPRQ112

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	heating source in new housing development.	Government's policy for national technical standards. However criteria G of Policy Ho9 allows for higher standards of sustainable design and construction for certain sites or areas where it is feasible and viable to do so and reflect the relevant national technical standards.	
	6. Health and open space issues		
	6a. This policy provides the opportunity to incorporate the principle of Active Design into new developments. Sport England believes that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.	Noted. The council recognise the benefits of active design. However it is considered detail design guidance should be set out in the housing design guide SPD. The council are also intending to include a new strategic health policy SC10 - Creating Healthy Places which includes reference active design principles.	CSPRQ077
	6b. Young kids need gardens to play in. The roads are too busy for playing on the street.	Noted. this is reflected in criteria D where new development should provide private outdoor space for homes. Further detailed guidance will be set out in the housing design guide SPD.	CSPRQ033
	6c. recreation area WITH-IN the community and not money being spent elsewhere away from the area of development	Requirements for open space and recreation are set out in the policy on planning obligations in the implementation section of the Core strategy. Open space will be required on larger sites where appropriate. Further detailed guidance on green spaces and within residential developments will be set out in the housing design guide SPD.	

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	7. Alternative construction methods		
	7a. Alternatives to traditional bricks and mortar construction should be considered. Timber-framed structures assembled off-site can provide flexible designs within the same development and can be built in a much shorter time.	Noted. The council will encourage and support new residential development to achieve high sustainable design and construction standards. However the council will consider whether it is necessary to include a criteria relating to supporting innovative/alternative construction methods in Policy HO9.	CSPRQ022
	7b. Thought should be given on allowing developers to use modern materials, style and technology.	Noted. The council will encourage and support new residential development to achieve high sustainable design and construction standards. However the council will consider whether it is necessary to include a criteria relating to supporting innovative/alternative construction methods in Policy HO9.	CSPRQ027
	7c. Why aren't we building more eco friendly timber framed homes	This question is considered outside the remit of the CSPR and Policy Ho9. The council will encourage and support new residential development to achieve high sustainable design and construction standards. In addition the council will consider whether it is necessary to include a criteria relating to supporting innovative/alternative construction methods in Policy HO9.	CSPRQ101
	8. Parking		
	8a. Roads are for travelling on, not as car	Comment noted. parking issues will be considered	CSPRQ034

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	parks. Creating roads that cannot be parked on, narrow and one way requires extra 'visitor' parking to be provided. Off road parking beside or within housing so that such space is not put to other uses.	as part of the overall design of the development .It is proposed further detailed. guidance will be set out in the Housing design guide SPD. Other Car parking issues are covered in the transport and design policies of the C SPR.	
	8b. please consider the number of car parking spaces for each house	Comment noted. parking issues will be considered as part of the overall design of the development .It is proposed further detailed. guidance will be set out in the Housing design guide SPD. Other Car parking issues are covered in the transport and design policies of the C SPR.	C SPRQ039
	8c. If building permission is passed, there must be space for 2 cars per house and visitors car parking too.	Comment noted. parking issues will be considered as part of the overall design of the development .It is proposed further detailed. guidance will be set out in the Housing design guide SPD. Other Car parking issues are covered in the transport and design policies of the C SPR.	C SPRQ094
	9. Bin storage		
	9a. Bins needs to be got off the streets. Other countries e,g Portugal , have good communal recycling bins/collection points , where most of the bin is buried below ground in a cage. The cage is then lifted for emptying by the recycling	Noted. the council recognise the issue of bins in regards to design. It is proposed further detailed guidance will be set out in the Housing design guide SPD. The council intend to include reference to supporting and encouraging innovative bin collection such as underground storage, in particular on strategic sites and high density	C SPRQ041

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		development in Policy Ho9.	
	10. Area specific issues		
	10a. In Haworth, Cross Roads and Stanbury Housing should reflect the heritage of the Parish and building should be sympathetic and to a high standard	Noted. Specific non-strategic policies and guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, , The Homes and Neighbourhoods Design Guide SPD and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so and reflect the relevant national technical standards.	CSPRQ054 CSPRQ055

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	1. General		
	1a. No comment	Noted.	CSPRQ026 CSPRQ055 CSPR019
	1b. Agree	Comments noted.	CSPRQ002 CSPRQ003 CSPRQ033 CSPRQ048
	1c. Again we are a low income city.	Noted.	CSPRQ025
	1.d. All houses should be affordable. If they cannot be affordable for purchase or renting by those working nearby what is the point?	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs.	CSPRQ034
	1e. Affordable for who exactly? Totally subjective and misused buzz word in existence.	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs.	CSPRQ038
	1f. For a long time I thought "affordable housing" was just that, cheaper housing for first time buyers. Whilst I agree that affordable housing is needed why not build council owned houses?	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs. The council has and will continue to	CSPRQ043

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		consider the building of new council owned houses where feasible.	
	1g. 'Affordable' does not necessarily mean affordable. Many households are supported in their housing through benefits and tax support. We need publicly controlled good quality housing and not theoretical solutions pandering the least helpful parts of the housing market.	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs.	CSPRQ056
	1h. If it starts off as affordable what limits will be in place on resale? Will owners only be able to sell back to the council?	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs.	CSPRQ061
	1i. Again a statement rather than a conclusion, so is difficult to comment against.	The council will consider the latest evidence of need identified in the SHMA and viability evidence in reviewing Policy Ho11. This will be made available for comment when completed at the Preferred Approach consultation stage.	CSPRQ062
	1j. We risk increasing homelessness if we have too little access to affordable housing	Noted. The council will use latest evidence in the SHMA to determine the overall need and viability study in determining the revised affordable housing policy. Policy Ho11 will seek to meet the affordable housing need in	CSPRQ066

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		the District.	
	1k. It is time to reconsider what is defined as "affordable", as this varies widely between communities. What is affordable in Greengates is not the same as what's affordable in Wharfedale. It's not just about land values and the amount of green space, but the whole concept is affected by what developers want to build. They want to build in the villages along the A65, but only larger properties with big price-tags, not what the local community would prefer.	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs.	CSPRQ067
	1l. Affordable needs to be defined. Some affordable houses are not in reach of any first time buyer	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs.	CSPRQ078
	1m. The term "Affordable Housing" and "Social Housing" are often confused. "Affordable" should be for first time buyers to get them on the property ladder. There should be flats, small houses and bungalows for "downsizers" so their larger family homes are freed-up. "Social" housing needs to be created to replace the sold-off council houses.	To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs. The council will plan for a mix of housing as set out in policy Ho8 however smaller houses do not necessarily meet the definition of affordable housing in national planning policy,	CSPRQ100

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	<p>1n. I have noted in Keighley that many of the housing association properties (predominantly classified as 'affordable') often have badly maintained gardens, overgrown and containing discarded household items. I must conclude that these properties are not suitable for there tenants. I presume that this is a result of a lack of a range of rented accommodation this is very galling for those on the housing list who would use a garden advantageously.</p>	<p>Noted. Comment not considered a relevant matter for Policy HO11 and the core Strategy partial Review.</p>	<p>CSPRQ080</p>
	<p>1o. There are too many expensive properties being built in specific areas of Bradford</p>	<p>Noted.</p>	<p>CSPRQ102</p>
	<p>1p. Is the council prepared to adopt a new lower priced definition of affordable housing in order to help the lower paid in the district?</p>	<p>To be considered affordable housing must meet the definition in national policy. This includes housing made available below market levels for people unable to access market housing to meet their needs. The council will plan for a mix of hosing as set out in policy Ho8 however smaller houses do not necessarily meet the definition of affordable housing in national planning policy,</p>	<p>CSPRQ110</p>
	<p>1q. Supporting a mix of housing is positive, policy should also seek to apply to mix tenures and value arranges across large sites to mix communities. In particular policy should pick large sites of mono tenure housing or low value housing and seek to include a greater element of higher value and private housing in</p>	<p>It is considered alongside Policy Ho8 housing ix that the policy will support a mix of tenures and values across all larger sites. To be considered affordable housing must meet the definition in national policy. This includes</p>	<p>CSPRQ113</p>

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	<p>order to provide better mixed communities and tenures. In many cases the municipalities house values are relatively affordable, a policy could be considered akin to Manchester where market housing at the lower end of the value range could be considered affordable in order to increase supply.</p>	<p>housing made available below market levels for people unable to access market housing to meet their needs. The council will plan for a mix of housing as set out in policy Ho8 however smaller houses do not necessarily meet the definition of affordable housing in national planning policy,</p>	
	<p>2. Comment of support</p>		
	<p>2a. Support the Council in looking to meet an evidenced affordable housing need and in utilising up to date viability information to determine a viable affordable target across appropriate sub-areas</p>	<p>Noted. The council will use latest evidence in the SHMA and viability study in determining the revised affordable housing policy.</p>	<p>CSPR002 CSPR003 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR012 CSPR013 CSPR017 CSPR029 CSPR032 CSPR033 CSPR037 CSPR044</p>
	<p>2b. BMDC should continue to ensure that the correct amount of affordable housing is provided</p>	<p>Noted. The council will consider the latest evidence in the SHMA and viability study and</p>	<p>CSPR014</p>

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	with differing targets across the district and subject to viability assessments in the interests of effective and positive planning	if there is any justification for setting affordable housing targets by sub area.	CSPR015
	2c. Support the policy requiring affordable housing on site.	Noted.	CSPR021 CSPRQ022
	2d. general comment of support		CSPRQ094 CSPRQ116
	2d. strongly support retention of a 30% affordable housing target for Wharfedale.	Noted. The council will use latest evidence of needs and viability in determining the revised affordable housing policy including affordable housing targets by sub area..	CSPR023
	2e. New homes should be where people want them.	Noted. It is considered new housing must be provided to meet both need and demand in locations that are sustainable.	CSPRQ029
	2f. Simply put, no more housing before transport infrastructure and adequate public facilities are in place	Noted. It is considered new housing must be provided to meet identified in locations that are sustainable.	CSPRQ031

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	3. Retain Existing Policy		
	3a. We support the retention of the current targets.	Noted.	CSPRQ107
	3b. Policy HO8 is reasonably flexible as currently drafted. The Council should assess the extent to which individual tenures may be encouraged in relation to local affordability and incomes, and reflect these in the policy. Together with changes to Policy HO11 this should reflect the NPPF expectation that a minimum of 10% of major developments should be delivered as an affordable home ownership tenure, such as rent to buy.	Noted. The SHMA will provide evidence on the need for affordable housing including tenure. The council recognise the NPPF expectation a minimum of 10% of major developments should be delivered as an affordable home ownership tenure. However Policy HO11 Criteria D will be informed by local evidence of identified need informed by the latest SHMA and will be a material factor when considering implementing Para 64 of the NPPF that requires 10% of housing to be for affordable home ownership.	CSPR041
	4. Comments on affordable housing type/tenure issues		
	4a. Advocate the building of small properties for local residents who can generally afford these properties. Prices must be realistic to the area.	Noted. The council will require an appropriate mix of properties in accordance with Policy HO8. Smaller market houses may not meet the definition of affordable housing in the NPPF or be affordable in perpetuity. To meet need affordable housing must meet the definition in the NPPF.	CSPR020

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	5. Viability Issues		
	5a. Evidence of viability should be more transparent. Viability reports should be more robust and with more validity. Thus it should be a rarity for the developers to ask for the affordable housing element to be removed from the planning permission and not the norm.	Noted. Policy ID2: Viability will ensure viability assessments are transparent and robust.	CSPR030
	5b. Many sites in inner and city areas are unviable as shown in the Councils previous evidence base, therefore flexibility should be added to enable sites in the more viable areas to provide commuted sums to assist in bringing forward other sites.	Noted. The council agree that the use of commuted sums were clearly justified can assist in deliverability of certain sites. However, this must be considered on a case by case basis and fully justified.	CSPR036
	5c. The affordable housing suggested is a joke. What will happen is that the company will get the contract, agree to do the affordable housing then, later on, they will be allowed to leave out the affordable housing, because of spurious reasons as happens now. Basically its a lie it will not happen.	The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. However targets are set based on district wide assumptions of viability. There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent	CSPRQ009

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		and robust.	
	<p>5d. IF you are going to have an affordable housing policy then it needs to be reasonable and deliverable. I know that Leeds have never his a affordable housing Target on any site in the last 20 years. Because the Policy can be challenged re viability and time and time again the Policy was watered down. So have a policy with some get out clauses where appropriate BUT set a reasonable target in the first place.</p>	<p>Agree any target in the plan should be considered viable and deliverable. The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. The targets in Policy Ho11 will be informed by the evidence of affordable housing need in the latest SHMA and considerations of viability across the District.</p>	CSPRQ016
	<p>5e. dont let the builders change so they are not delivered like Skipton Homes have repeatedly done</p>	<p>The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. However targets are set based on district wide assumptions of viability. There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent and robust.</p>	CSPRQ020

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	<p>5f. if the Council are looking to increase standards in excess of national planning and building regulation standards, then the cost of housing development will increase. In turn, this will have an impact of viability and affordable housing. Therefore if the Council wishes to pursue a number of housing quality policy requirements, then it is likely that the affordable housing targets may need to be reduced.</p>	<p>Noted. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11. This will include any housing standards in the local plan.</p>	<p>CSPRQ099</p>
	<p>5g. This policy from experience of developments over the last 2 years in Craven clearly does not appear to be working. Social housing providers apparently are not in a position to take full advantage of these offerings and viability assessments have been used to reduce the agreed promise thro S106 at outline. Viability appraisals should be in the public domain. Consider consolidation of %s into complete dwellings - then council managed.</p>	<p>The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. However targets are set based on district wide assumptions of viability. There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent and robust, including publically available.</p>	<p>CSPRQ108</p>
	<p>5h. There is great need for affordable housing. But developers cannot be allowed to submit plans to planning and then go back at a later stage and say they cannot afford to build xyz. The Viability Assessment Mechanism should be done pre application and when plans passed, that is what the developer builds and takes a hit if their VAM is</p>	<p>Noted. The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. However targets are set based on</p>	<p>CSPRQ109</p>

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	incorrect.	district wide assumptions of viability. There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent and robust, including publically available.	
	5i. Will the council ensure that any targets set in regard to affordable housing are met within each local area rather than allowing developers to switch their commitments to other sites?	Noted. The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. However targets are set based on district wide assumptions of viability. There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent and robust, including publically available.	CSPRQ110
	5j. Viability assessments have been shown to be capable of manipulation with small changes in figures for, for example projected sale price of houses, producing radically different results. In particular we would draw attention to the need to take account of overpayment for sites and suggest that this should not be a valid reason for claiming that a site is unviable unless affordable housing targets are reduced or eliminated. Unless BMDC takes a more robust	Noted. The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. However targets are set based on district wide assumptions of viability. There maybe exceptional site specific reasons the	CSPRQ112

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	approach, affordable housing targets will not be met.	policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent and robust, including publically available.	
	5k. Additional density generally delivers greater supply of housing and more vibrant communities by increasing the number of people residing in any given area, furthermore in this market greater density generally results in smaller lower value homes which are more affordable even when they are market dwellings. A mechanism should be considered which encourages delivery of greater density on sites by lowering affordable housing contributions on higher density sites and increasing affordable contributions on lower density sites- however still retaining viability testing if necessary.	Noted. The approach to density is set out in Policy Ho5. The council will consider the viability of different types of development including flats through the whole plan viability assessment.	CSPRQ112
	5l. Increasing the supply of housing supports increasing housing affordability through generating economic output increasing incomes and also reducing demand driven price rises. Therefore if affordable housing will render a scheme undeliverable its requirement should be dropped or reduced.	There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent and robust, including publically available.	CSPRQ113
	5m. The Council should resist pressure from developers to lower affordable housing targets on the grounds only of "viability" which has resulted nationally	There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then	CSPRQ114

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	<p>in too many cases of targets being relaxed. However the Council should review targets to take account of new evidence of changing need .</p>	<p>Policy ID2: Viability will ensure viability assessments are transparent and robust, including publically available.</p> <p>The council will consider evidence in the latest SHMA on housing need to inform the review of Policy Ho11.</p>	
	<p>5n. Bradford should continue to ensure that the correct amount of affordable housing is provided with differing targets across the district and subject to viability assessments in the interests of effective and positive planning.</p>	<p>Noted. The council propose to remove the 'up to' from the policy with the expectation that any targets proposed in Policy Ho11 will be viable and expected to be met from development in line with the requirements of the policy. However targets are set based on district wide assumptions of viability. There maybe exceptional site specific reasons the policy targets cannot be achieved. Where this can be justified then Policy ID2: Viability will ensure viability assessments are transparent and robust, including publically available.</p>	<p>CSPRQ034</p>
	<p>5o. Many of the sites in inner and city areas are unviable as shown in the Councils previous evidence base, therefore flexibility should be added to enable sites in the more viable areas to provide commuted sums to assist in bringing forward other sites.</p>	<p>Noted. PolicyHo11 is considered in line with national policy. Affordable housing will be required on site but the policy is flexible and allows for a commuted sum in lieu of affordable contributions in certain instances</p>	<p>CSPR037</p>

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		where clearly justified.	
	6. Access to Affordable Housing		
	6a Every attempt must be made to ensure local people can access affordable homes in their own areas. Schemes should be also available to prove that an applicant for affordable housing is from the local area.	Noted. It is not considered appropriate for the strategic core strategy policy to set out a local nomination criteria for affordable housing. This will be set through the council's eligibility and nomination policy for affordable housing.	CSPR030
	7. Evidence		
	7a. The latest data should be used	Agee. The council will consider the latest evidence of need identified in the SHMA and viability evidence in reviewing Policy Ho11.	CSPRQ007
	7b. Evidence from where? How can you ask people to comment without clear consultation evidence?	The council will consider the latest evidence of need identified in the SHMA and viability evidence in reviewing Policy Ho11. This will be made available for comment when completed at the Preferred Approach consultation stage.	CSPRQ006
	7c. The overall policy requires regular review to determine the consequences of a combination of CIL and affordable housing on viability.	Noted. The policy will be reviewed alongside the CIL review as part of the Whole plan viability assessment evidence supporting the CSPR.	CSPRQ113
	7d. We acknowledge the need to revisit the affordable housing requirements within the District's sub areas, and note that the new SHMA will be a key piece of	The council will consider the latest evidence of need identified in the SHMA and viability evidence in reviewing Policy Ho11. This will	CSPR005

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	evidence in determining any amended targets. Likewise, the viability assessment will also be key in determining the deliverability of affordable housing targets in different sub-areas. We would welcome notification of early findings of the SHMA and viability work and would welcome the opportunity to provide input.	be made available for comment when completed at the Preferred Approach consultation stage.	
	7e. Question whether the district wide survey of local housing needs will be fine enough grain to determine real needs in smaller communities such as Addingham.	Noted. The SHMA will include a new updated household survey. It is considered the methodology and response rate used is robust and will enable justified policies to be developed at the sub area level but not settlement level. Policy HO11 allows for any local evidence of affordable housing need to be considered on a site by site basis.	CSPR023
	8. Transfer Values		
	8a. The process should not be based on fixed transfer values and instead, best price competitive tenders would be supported in order to ensure affordable homes are deliverable across the District.	Noted. Core Strategy Policy HO11 does define a fixed transfer value.	CSPR044

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	9. On-going Review Process		
	9a. These targets should also be subject to regular review.	Noted. the local plan with be reviewed at least every 5 years in accordance with national planning policy.	CSPRQ022
	10. Affordable Housing Targets		
	10a. The quoted targets seem to be arbitrary and any changes in figures will be just as arbitrary. To avoid social deficits, local areas should have a mix of housing, a mix of age groups, a mix of "classes". And all that should be done on previously used land.	The targets in Policy Ho11 are informed by the evidence of affordable housing need in the latest SHMA and considerations of viability across the District. The suggested approach is not considered in line with national planning policy on affordable housing.	CSPRQ014
	10b. 30 % is needed in Silsden (Aire Valley)	Noted. The targets in Policy Ho11 are informed by the evidence of affordable housing need in the latest SHMA and considerations of viability across the District. No evidence is presented to justify this comment.	CSPRQ015
	10c. There should be more affordable housing in inner Bradford (15 % is ridiculously low). As previously stated. Inner areas will need cleaning up to be more desirable (less air pollution/noise pollution, bike friendly, green..etc)	Noted. Evidence of affordable housing need in the SHMA indicates the highest grow need is in the city central areas. However these areas also have a larger supply of existing affordable housing. In addition affordable	CSPRQ021

Appendix 10: Policy HO11 - Comments Received and CBMDC Response

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		housing targets must be set in line with viability considerations.	
	10d. As the retail sector is being shrunk maybe looking at using shops for housing. Inner Bfd and Kly's % needs to rise to 25% as it already has the infrastructure to cope with new-builds.	Noted. Evidence of affordable housing need in the SHMA indicates the highest gross need is in the city central areas. However these areas also have a larger supply of existing affordable housing. In addition affordable housing targets must be set in line with viability considerations.	CSPRQ027
	10e. We need social housing not affordable homes in the city. The constant allowing of the removal of the so called affordable homes from developments is a joke and the developers are paying out vast bonuses at the same time More social housing and less affordable homes are needed	Noted. the policy must be in line with the NPPF definition of affordable housing, This includes social rent as well as affordable rent and other affordable home ownership products. Latest evince in the SHMA will consider the affordability and need for different types of affordable housing.	CSPRQ028
	10f. Younger people should have a better chance to move to better ar areas and ilkley shoud be included	Agree. Policy Ho11 identifies a need for affordable housing in Wharfedale	CSPRQ030
	10g. The policy needs to be adopted, there's a need throughout the district for affordable homes, and numbers need to be increased to a minimum 50%. How else are people supposed to get on the housing ladder. Once again I draw attention to the average wage in the District - £21,005.	Noted. Agree there is a need for affordable hosing across the District as evidenced in the latest SHMA. The comment does not provide any evidence justify the 50% need. Policy Ho11 will be informed by both evidence of need it he SHMA and the viability of	CSPRQ036

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		affordable housing ion line with national planning policy.	
	10h. The adopted Core Strategy already recognises that the different areas within the Bradford district can have different housing needs and as such produces different affordable housing targets. It is our view that this approach should be continued through to the revised Core Strategy, but to reflect the new information which is gathered as part of the revised evidence base studies.	Noted. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.	CSPRQ034
	10i. If Bradford needs homes then it is common sense to have the highest number of affordable homes possible So I recommend one flat figure regardless of geographical area	Noted. The current policy reflects identified need and the different viability of achieving affordable housing from developer contributions in different areas of the district. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.	CSPRQ037
	10j. These percentages need to be higher	Noted. The comment is not supported by any evidence of need or viability. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.	CSPRQ039

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	10k. The targets should be change to reflect new information on housing need,	Agree. This will be evidenced in the latest SHMA.	CSPRQ040
	10l. I'm no expert but this proposed distribution of affordable housing feels completely wrong. I would have expected more affordable holding to be needed in the city centre and Keighley.	<p>Noted. Evidence of affordable housing need in the SHMA indicates the highest gross need is in the city central areas. However these areas also have a larger supply of existing affordable housing. In addition affordable housing targets must be set in line with viability considerations</p> <p>The current policy reflects identified need and the different viability of achieving affordable housing from developer contributions in different areas of the district. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.</p>	CSPRQ041
	10m. Use of Brownfield sites and bring homes back into use should be priority here.	Noted. the council will prioritise the use of brownfield land and bringing back empty homes into use to meet housing need including affordable housing.	CSPRQ049

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	<p>10n. The need for affordable targets is likely to be greatest the more expensive areas.</p>	<p>Noted. Evidence of affordable housing need in the SHMA indicates the highest gross need is in the city central areas. However these areas also have a larger supply of existing affordable housing. In addition affordable housing targets must be set in line with viability considerations</p>	<p>CSPRQ051</p>
	<p>10o. I believe 20% for affordable housing for Haworth, Cross Roads and Stanbury is correct</p>	<p>Noted. The comment is not supported by any evidence of need or viability. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.</p>	<p>CSPRQ054</p>
	<p>10p. How can you adhere to these quotas when there are no school places for children to attend? It is necessary but the school accommodation needs to be looked at as a priority as does medical provision and access to work and ease of commuting elsewhere. Affordable housing is essential as many young people and families can only afford to rent. Need to get their foot on the property ladder and become fully integrated into communities.</p>	<p>Comment noted. The current policy reflects identified need and the different viability of achieving affordable housing from developer contributions in different areas of the district. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11. Whilst important in regards to strategic infrastructure planning issues the availability of education places is not considered an appropriate consideration</p>	<p>CSPRQ058</p>

Appendix 10: Policy HO11 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
		in regards to Policy Ho11 in line with national planning policy requirements.	
	10q. 15% in inner towns is inadequate	Noted. The comment is not supported by any evidence of need or viability. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.	CSPRQ059
	10r. higher % for larger sites (say 30-50 dwellings, 51-150 dwellings and 151+) - this way bespoke smaller sites should not have a commitment to social housing. most housing associations wouldn't consider taking on 1 or 2 social houses on smaller sites as such defeats the purpose	Noted. NPPF states that provision of affordable housing should not be sought for residential developments that are not major developments. PolicyHo11 is considered in line with national policy. Affordable housing will be required on site but the policy is flexible and allows for a commuted sum in lieu of affordable contributions in certain instances where clearly justified.	CSPRQ060
	10s. Build where the homes are actually needed. Expand smaller villages etc to bring in younger people	Policy Ho11 does not seek to distribute housing. However the Policy does allow for	CSPRQ063

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	and bring life to the environment	rural exception sites to deliver affordable housing to meet local need in smaller rural settlements.	
	10t. Increase the percentage in the inner parts of the cities	Noted. The comment is not supported by any evidence of need or viability. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.	CSPRQ073
	10u. Targets should be set to improve the Bradford area	Noted.	CSPRQ089
	10v. Use some of the brownfield sites in and around the centre of Bradford	Noted. whilst the council will prioritise housing delivery including affordable housing on brownfield/PDL land as set out in other policies in the Core Strategy , the type of land is not considered a relevant consideration in regards to Policy Ho11	CSPRQ101
	10w. affordable housing needs to be provided but not at the detriment of green spaces	Noted. whilst the council will prioritise housing delivery including affordable housing on brownfield/PDL land as set out in other policies in the Core Strategy , the type of land is not considered a relevant consideration in regards to Policy Ho11	CSPRQ090

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	<p>10x. support the use of affordable housing targets which seek to reflect different housing markets as opposed to a blanket target across the whole of the District.</p>	<p>Noted. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.</p>	<p>CSPRQ099</p>
	<p>10y. These targets are nonsensical. How nonsensical is illustrated by the fact that 'affordable' housing in areas where there are very few jobs but where homes are expensive (Wharfedale is the key example) will cost more (to purchase or rent) than median priced (open market) property elsewhere in the district where there is high housing need and where there are jobs. This policy effectively provides a subsidy for more affluent individuals to enable them to buy a premium home while depriving people who need help to access the housing market from getting that help. My understanding is that Local Planning Authorities are able, if they can justify it at the stage where a Local Plan is being developed or revised, to establish the principle that affordable housing delivery can be off-site and via commuted sums. A highly polarised housing market that would otherwise be incapable of delivering genuinely affordable housing would appear to provide sufficient justification.</p>	<p>Noted. The comment is not supported by any evidence of need or viability. The council will consider the latest evidence of both need and viability across the District in line with national policy requirements in the review of Policy Ho11.</p> <p>To create mixed communities the policy seeks affordable on site in line with national planning policy. However. Policy Ho11 includes the ability to pay for commuted sums in lieu of affordable housing where justified.</p>	<p>CSPRQ111</p>

Appendix 11: Policy HO12 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General		
	1a. No comment		CSPRQ015 CSPRQ016 CSPRQ026 CSPRQ051 CSPRQ055 CSPRQ062 CSPRQ099 CSPRQ107 CSPRQ112 CSPR003 CSPR019 CSPR030
	1b. Disagree	noted	CSPRQ030 CSPRQ059
	1c. Agree. Update as required	Noted.	CSPRQ037 CSPRQ056 CSPRQ060 CSPRQ111
	Police involvement?	Comment not considered relevant.	CSPRQ078
	2. Locational matters for new provision		
	2a. When giving consideration to the development of policies in relation to development of gypsy and travellers sites we would like to highlight that our expectation is that all gypsy and traveller sites will be located outside of flood zone 3 as such development	Noted. The council will ensure it takes a sequential approach to flood risk in regards to Gypsy and Traveller sites.	CSPR031

Appendix 11: Policy HO12 - Comments Received and CBMDC Response

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	in flood zone 3 is inappropriate. Any gypsy and traveller sites proposed in flood zone 2 are only acceptable subject to them being in accordance with the Sequential and Exception Tests. This is in accordance with Tables 1 to 3 of the PPG.		
	2b The Parish Council feel that these sites would be inappropriate within the Parish due to the heritage value of the location , also the terrain would be unsuitable for caravan	Noted. The detailed consideration of site allocations will be undertaken through the Allocations DPD.	CSPR020
	2c. AD/013 is a site available now and all types of housing are possible and Affordable Housing a priority	Noted. The detailed consideration of site allocations will be undertaken through the Allocations DPD.	CSPR022
	2d. Are you going to greatly increase police presence in areas where travellers are as there is often increase in crime, also do we as tax payers have the burden of cleaning up after them - I hope they pay a fee for settling on public land	Comment not considered relevant to Local Plan matters or Policy HO12.	CSPRQ006
	2e. I have no view on this other than to say sites should meet the same requirements as housing sites.	Noted. The council will identify specific sites to meet any identified need through the Allocations DPD. Policy HO12 sets out the broad criteria for considering the location of any potential site. This includes the general locational principles used for housing sites as set out in Policy SC5.	CSPRQ048
	2f. Dont hide the gypsies/travellers give them MANNINGHAM, THORNTON ROAD, CANAL ROAD	Comment noted. The council will identify specific sites to meet any identified need through the	CSPRQ045

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Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
		Allocations DPD. Policy HO12 sets out the broad criteria for considering the location of any potential site.	
	2g. Any provision made for these sites should be well away from existing housing. It is unfair on existing residents to have their area/outlook changed when they have committed themselves to, probably, large and long mortgages and aspired to be in that area. Travellers choose that way of life and the freedom of choice it gives them. Residents should be afforded that freedom of choice too.	Noted. The council will identify specific sites to meet any identified need through the Allocations DPD. Policy HO12 sets out the broad criteria for considering the location of any potential site. This includes the general locational principles used for housing sites as set out in Policy SC5.	CSPRQ100
	2h. These should not be built on green land, they use lots of trucks etc so would be more suitable on brownfield sites.	Noted. Comment noted. The council will identify specific sites to meet any identified need through the Allocations DPD. Policy HO12 sets out the broad criteria for considering the location of any potential site. This includes the general locational principles used for housing sites including priority to brownfield land as set out in Policy SC5.	CSPRQ061
	2i. The travelling community should have somewhere where they can live safely without fear of harassment and threat but also have a duty to treat communities where they live, if only on a temporary basis, with respect and contribute where they can.	Noted. The council will seek to meet any identified need through additional pitches in appropriate locations identified through the Allocations DPD.	CSPRQ058
	2j. This should not be allowed in Haworth, Cross Roads and Stanbury as it could impact on the historic nature of this rural location	Noted. The council will identify specific sites to meet any identified need through the Allocations DPD. Policy HO12 sets out the broad criteria for	CSPRQ054 CSPRQ079

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		considering the location of any potential site. The principles for identifying the most appropriate sites are set out in the site assessment methodology. This will include impact on conservation and historic assets. However I is not considered appropriate to rule out any specific settlement at this stage in the strategic policy.	
	3. Comments relating to meeting additional need for gypsy and travellers.		
	3a. General comments of support for meeting identified need for Gypsy and travellers.	Noted.	CSPRQ034 CSPRQ035 CSPRQ036 CSPRQ066
	3b. These will be ok so long as the occupiers pay the going rate to stay and the Council take action to stop then breaking into private land and staying on these site.	Noted.	CSPRQ008
	3c. Various comments objecting to and questioning the need to make any provision for gypsy and traveller accommodation.	The council is required to meet the identified needs of gypsy and travellers in line with national planning policy requirements and primary legislation.	CSPRQ002 CSPRQ009 CSPRQ013 CSPRQ023 CSPRQ025 CSPRQ028

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			CSPRQ084 CSPRQ104
	3d. Comments referring to the availability of existing/vacant plots on authorised sites.	Comment noted. The council will undertake further analysis of the net need as part of the updated Gypsy and Traveller accommodation Assessment. This will include factoring in any vacant pitches where considered available.	CSPRQ063 CSPRQ018 CSPRQ020 CSPRQ061
	3e. Ok with the genuine peoples of this type but not the ones I see camped in parks, public places and on private land these	Noted. The council is required to plan for both the planning needs of travellers and allocate land to meet this need and consider any other specific cultural needs in line with requirements set out in national planning policy and primary Legislation in the Equalities and Housing Acts.	CSPRQ029
	3f. Double the size of the Bowling Back Lane gypsy site and remove illegal sites	The council will consider capacity to expand existing provision as part of the latest evidence of Gypsy and Traveller accommodation Assessment	CSPRQ033
	3g. as a close nit community, existing sites should be extended so the community can grow together	Noted. The council will consider capacity to expand existing provision as part of the latest evidence of Gypsy and Traveller accommodation Assessment	CSPRQ090
	4. Evidence Base		
	4a. What progress has been made, has a comprehensive review taken place with neighbouring	The council has updated its evidence through an updated Gypsy and Traveller Accommodation	CSPRQ108

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Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	authorities?	Assessment. Any strategic Cross boundary issues will be considered as part of the duty to co-operate matters as part of the local plan preparation.	

Appendix 12: Policy EC1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General Comments		
	1a. No comments.	Noted.	CSPR003 CSPRQ016 CSPRQ048 CSPRQ055 CSPRQ107 CSPRQ112
	1b. Please put into lucid, and linked, Plain English	Noted.	CSPRQ033
	1c. Creating a successful and competitive Bradford District economy within the Leeds City Region	Noted.	CSPR033
	1d. A statement rather than a conclusion, so is difficult to comment against.	Noted.	CSPRQ062
	1e. No confidence in the Council's business expertise; for that reason alone we remain in the shadow of Leeds.	Noted.	CSPRQ025
	1f. Will the council realise that the fundamental problem with employability in the district lies with the under-achieving pupils and that educational attainment must be improved in order to produce a more skilled workforce? Indeed should education not be a critical part of the Core Strategy?	The Economy Chapter of the Revised Core Strategy now more heavily reflects the importance of skills.	CSPR039

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	2. General – Support		
	2a. Support	Support noted.	CSPRQ030 CSPRQ060 CSPRQ111
	2b. We support the proposed review of this policy on the basis of a new and updated evidence base.	Support noted.	CSPRQ070
	2c. As a business who builds in Bradford and employs people living in Bradford we support the Council in wanting to create a successful economy. With such ambition and a desire to deliver economic growth in Bradford over the next 15 years, it means that a significant number of new homes will be required to support this.	The Council has sought to align the key evidence bases relating to the requirement for employment (Employment Needs Assessment and Land Review) and housing (SHMA).	CSPRQ099
	2d. I consider needs a complete review; a) Regarding Northern Powerhouse Rail b) Need to minimise commuting and provision of housing close to the workplace c) Differentiate the Bradford offering to offer an attractive option to the opportunities provided by other competing authorities	The revised Transport and Movement now picks up on the importance of North Powerhouse Rail and commuting. The revised Economy Chapter attempts to establish a planning framework for the District to create a unique employment offer to existing businesses and new investors.	CSPRQ018
	2e. Will be important for all our villages, towns and cities in the years to come as Brexit takes place. Look forward to economic growth and prosperity for our communities.	Noted.	CSPR058

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	3. General – Policy Update		
	3a. Update to include new policy or your own policy will quickly become out dated	The Policies within the Core Strategy are all linked to monitoring indicators and will be subject to statutory 5 year reviews following adoption.	CSPRQ037
	4. General – District Strategy		
	4a. Set up working parties with business people and the general public as councillors will be useless at setting strategy	The Council will and continue to consultant with all parties and work closely with key stakeholders in the production of the Core Strategy.	CSPRQ006
	4b. We should align this to the Economic Strategy for Bradford District and inclusive and environmentally friendly economies.	Noted. The revised Policies within the Economy Chapter of the Core Strategy now fully align with the Bradford Economic Growth Strategy. The policies within the Economy and Environment Chapters reflect the need for developments to avoid significant environmental impacts.	CSPRQ049
	4c. Existing Economic Growth ? What growth ! Perhaps the council should have some consultation on their plans for economic growth in the area and how they plan to generate the necessary income to provide any sort of basic infrastructure for the district as it exists today. If the council believe that there will be some sort of Northern Powerhouse because of Rail development I believe you are sadly mistaken. Bradford has been left in the dark ages through a series of inept councils who have not had the vision for the future only to be driven by profiteering developers	Infrastructure provision has been considered as a key facilitator of economic growth within the Economy and Transport and Movement Chapters.	CSPRQ105

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	with no concern for the despair that has been left behind.		
	5. General - Strategy		
	5a. These are all national strategies. Let's have some unique input from council. Here again, the word Industrial is mentioned, whilst it is part of the mix, the district isn't suited to large scale manufacturing (it's to hilly and there's the issue of surface drainage). Historically, surface drainage was the main reason behind the foundation of the textile industry in Bradford.	The Policies within the Economy chapter are considered to fully reflect the aspirations of regional, sub-regional and local economic strategies, including the Bradford Economic Growth Strategies.	CSPRQ036
	5b. Bradford should be aiming for above average growth primarily in order to benefit existing residents by: reducing unemployment increasing the economic activity rate increasing skilled jobs and wage levels reducing the level of commuting out of Bradford	The revised Policies within the Economy Chapter proposes a higher than baseline growth scenario, which is reflective of the Council aspirations.	CSPRQ051
	5c. By way of general observation we repeat our comments at paragraphs 4.2,4.3 and 6 of our response to Table 2 - HO1. The broad nature of the observations in Policy EC1 are difficult to fault, but do not signify a great deal. We emphasise that in our view the key to long term economic success in Bradford lies in tackling the fundamental social and educational deficiencies facing the District. Bradford has some of the worst schools in the country,	The Economy Chapter of the Revised Core Strategy now more heavily reflects the importance of skills and the fundamental part they play in economic growth.	CSPRQ114

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	<p>and consequently our young people are not achieving all that they are capable of. Some schools are improving but there is a long way to go. This problem has been tackled in London, where in places like the London Borough of Newham educational underperformance has been transformed across the Borough over a period of 8-10 years. To deal with this problem needs leadership and ambition, but most of all a recognition that in failing the pupils of today the District is hampering its prospects of economic development in the future. This section of the Core Strategy should include a specific goal to improve schools ratings at all levels and educational and skills training outcomes with measurable targets on a phased basis.</p> <p>Likewise high levels of social deprivation and health issues need to be tackled as an intergrated part of the Planning for Prosperity, Economy and Jobs section of the Core Strategy. It should be recognised that employers, large and small, particularly entrepreneurs and business start-ups, need to be able to rely on a local supply of motivated and able workers, and the evidence of the HWPB is that such supply is not here yet.</p>		
	<p>5d. NIMBY attitudes will prevail if housing and industry are not created in parallel. Creating nearby housing and other facilities nearer to places of work is really an attitude that needs to be adopted.</p>	<p>Reducing the need to travel and travelling by more sustainable transport modes are key elements within the revised Policies within the Economy and Transport and Movement Chapters.</p>	<p>CSPRQ034</p>

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	5e. Anything that can improve the economic prosperity should be considered as long it isn't at the cost of the rural outlook of the area in areas like Haworth, Cross Roads and Stanbury	Noted.	CSPRQ052
	6. General – Leeds City Region		
	6a. Initiatives that create competitive advantage for both Bradford district and the wider Leeds City region are supported, as there will be spin offs that will benefit both in the wider Leeds City Region and Craven district. This approach is supported in principle.	The Council acknowledges the support from the neighbouring authority of Craven District Council.	CSPRQ019
	6b. We should not be part of the Leeds city region without a democratic mandate from the people of the city	Noted.	CSPRQ028
	6c. Yes our Council should work with Leeds in this region and not against as seems to happen.	Noted. The Council will work closely with all key stakeholders, including Leeds City Region.	CSPRQ029
	6d. Leeds does not want Bradford, Keighley and Ilkley do not want Bradford. Bradford does want the cash cows in it's outer districts.	Noted.	CSPRQ038
	7. General - Leeds		
	7a. The City of Leeds has demonstrated how to do this. CBMDC has not yet woken up to the realisation that it is creating a "doughnut city" – derelict in the centre and pushing its residents to the fringes. Leeds	Noted. The Policies within the Core Strategy look to maximise the use of PDL and sustainable transport modes. The policies with the Economy chapter prioritise Bradford City Centre for all	CSPRQ067

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	<p>has capitalised by constructing flats and a range of housing types to interest existing residents, its large student population and those who work in the city, thereby avoiding commuting and displacement. The more people live close to their work, the more likely they are to spend their wages in the city and thus revitalise the economy, and they'll waste less of their income on fuel and travel, thereby helping to reduce pollution. Bradford would be well advised NOT to construct any more shopping centres outside the city (eg. Richard Dunne Centre) but to use such PDL for housing with good transport links into the city centre, and thereby stimulate the (now declining) high-street shops which need more footfall.</p>	<p>major town centre uses.</p>	
	<p>7b. Leeds is growing, Bradford is not, work to make Bradford competitive</p>	<p>Noted. The Economy Chapter attempts to establish a planning framework for the District to facilitate economic growth.</p>	<p>CSPRQ089</p>
	<p>8. General – Infrastructure</p>		
	<p>8a. The north desperately needs better public transport with light rail and new stations esp at Crosshills</p>	<p>Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.</p>	<p>CSPRQ039</p>
	<p>8a. The current rail network seems to be at capacity at peak times plus the new trains are too long for some of our station platforms, this need sorting out.</p>	<p>Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.</p>	<p>CSPRQ006</p>

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	8b. I see no signs of improvement to the rail system which is hugely overburdened already.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ064
	8c. Bear in mind that the Rail schemes are not likely to deliver in the timescales originally set out.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ078
	8d. Train from Leeds and Bradford via Keighley to Skipton on to Manchester	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ020
	8e. Rail from Apperley Bridge to Ilkley would be ideal.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ088
	8f. Wait until H2 is confirmed as going ahead	Noted.	CSPRQ059
	8g. If this refers to HS2 then I have never seen a need for this and think it has been a complete waste of funds	Noted.	CSPRQ102
	8h. The key is linking Bradford to a through rail service. At the moment it is double dead-end city - not good enough in this day and age. It should have through routes to Manchester, Leeds, as well as all the	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public	CSPRQ069

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	smaller towns along and around. I would to believe in the Northern Powerhouse but there is not the will in the hols of power. Also to traditional Bradford families it is an insult to be classed as an outlying part of Leeds.	transport.	
	8i. Better links to Leeds Bradford Airport is a must especially as expansion is planned, rail links to Leeds etc in Tong would save congestion to Leeds or Bradford city centres.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ063
	8j. Put more houses in bradford and leeds where they don't have to travel and leave silsden alone - you will not give us the roads to help or the access to our local train station without crossing a bypass - its just not right then you want are votes - bradford have never looked after silsden you only want our money -	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better pedestrian and cycle routes.	CSPRQ024
	8k. Main thing here is transport. Need to conn3 t up the 2 railway lines. Improve schools. Keep th3 green belt so people actually want to live in Bradford. Try to get more companies based in Bradford.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ032
	8l. Please focus on the provision of good broadband, and the transport policy. We should maximise the use of rail rather than busses, maybe consider if trams would be appropriate/affordable in the medium to long term. There needs to be more parking provision at stations if we want to get commuters out of their cars.	Noted. The Economy and Transport and Movement Chapters establishes a planning framework for the District to facilitate investment and deliver better public transport and telecommunications network	CSPRQ041

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	9. General – Northern Powerhouse Rail / Connectivity		
	9a. Northern Powerhouse Rail is about connectivity and would be better served if the two branch lines to Bradford, separated by 300 yards, were joined up to allow through connectivity throughout the district. Whatever happened to Bradford civic pride that it should have to cow tow to Leeds. If the future prosperity of the Bradford district is subject to the dictates of Leeds then it would be better served if Bradford council was abolished and Leeds took over directly, thus saving council tax payers vast amounts in unnecessary administrative costs.	Infrastructure provision has been considered as a key facilitator of economic growth within the Economy and Transport and Movement Chapters.	CSPRQ024
	10. Economic Growth Strategy		
	10a. While the details of initiatives such as Northern Powerhouse Rail remain uncertain, the economic growth strategy must remain flexible.	Noted.	CSPRQ022
	10b. Creating a successful and competitive economy Securing economic growth and a vibrant local economy is fundamental to the well-being of residents and businesses in the District. It is important that economic growth is supported and that the Local Plan policies do not act as a hindrance or impediment to supporting job and wealth creation. The Council will need to ensure that there is a link between economic growth and jobs, with new housing and infrastructure	The Council will set out within the revised policy the strategic approach to economic growth over the plan period. The revised policy will have strong connections to the Bradford Economic Growth Strategy and will act as a catalyst to job and wealth creation. The policy documents and supporting evidence bases will establish strong linkages between the projected levels of economic growth and an appropriate housing requirement to facilitate the creation of new job	CSPR017

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	provision.	opportunities. The Infrastructure Delivery Plan and Strategic Transport Modal shall form the primary evidence bases to ensure the infrastructure requirements to deliver levels of economic and housing growth are fully considered and planned for.	
	10c. Economic Growth (Policy EC1, EC2 and EC3) - The Council wants to enable a strong and vibrant economy to flourish and businesses need land and premises to support jobs. It is important that the economic growth in the district is aligned with housing growth and that a wide range of high-quality housing is provided across the district to attract and retain employees. This is recognised in the Governments 'Industrial Strategy Building a Britain fit for the future' (November 2017) which states "Housing is vital to the economic success of our cities and regions... The government wants to support places with ambitious and innovative plans to build additional homes where they are needed, and which will support wider economic growth. We want to support greater collaboration between councils, a more strategic approach to planning housing and infrastructure, more innovation and high-quality design in new homes and creating the right conditions for new private investment".	The revised policy will have strong connections to the Bradford Economic Growth Strategy and will act as a catalyst to job and wealth creation. The policy documents and supporting evidence bases will establish strong linkages between the projected levels of economic growth and an appropriate housing requirement to facilitate the creation of new job opportunities.	CSPR018
	10d. The Council "Having Ambition" for economic growth is desirable but unless there is evidence of the	The revised policy will have strong connections to the Bradford Economic Growth Strategy and will	CSPR030

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	<p>district actually successfully achieving economic growth there seems little point in setting large housing numbers when there is little chance of those people being employed locally.</p> <p>Bradford will have to compete hard to make sure new businesses comes to Bradford otherwise workers will simply work in Leeds or Manchester and invest in their economies.</p> <p>If the transport infrastructure is not there then people will simply continue to use their cars to travel long distances for work. It is better to build the housing near to the transport links.</p>	<p>act as a catalyst to job and wealth creation. The policy documents and supporting evidence bases will establish strong linkages between the projected levels of economic growth and an appropriate housing requirement to facilitate the creation of new job opportunities.</p>	
	<p>10e. Looking at the number of empty retail units in my town (Keighley) there's been a signal failure on this one. Why not CPO the land on East Parade where there appears to be a plan for a new shopping centre (madness when the existing one is partially empty), create a free parking area thereby encouraging shoppers which I believe will lead to an increase in retail units in the town</p>	<p>The Policies within the Economy chapter will look to prioritise town centre uses within the in-centre locations, and establish a planning framework to support prosperous town centres.</p>	<p>CSPRQ061</p>
	<p>10f. Agree, developing redundant inner city Mills will facilitate this</p>	<p>Noted. The reuse use of former Mills and other employment uses will be considered in the delivery of jobs over the plan period.</p>	<p>CSPRQ098</p>
	<p>11. Leisure and Tourism</p>		
	<p>11a. As part of the review of this policy, it should seek to maintain the importance of leisure and tourism as a</p>	<p>Tourism and leisure are aspects of the economic growth profile for the District, and as such these</p>	<p>CSPR042</p>

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	<p>key economic and employment generator within the District. We consider that the role of the visitor economy should be more explicitly recognised within the district which should be included in the evidence base and within the review of this policy.</p> <p>As stated in the Scoping Report, the Economic Strategy for Bradford District 2018 – 2030 should be considered as part of the review of this policy. The Strategy recognises that a key opportunity for the district is recognising its distinctive offer which includes “using our unique architecture, heritage and cultural assets to create compelling investment propositions and an environment for growth.” The importance of heritage and cultural assets could be reflected within the policy review when establishing a set of new economic priorities and identifying the sectors which will be the drivers and focus for future economic growth in the District.</p>	<p>sectors will be supported through any revisions to EC1.</p>	
	<p>11b. The Parish of Haworth Cross Roads & Stanbury (Ref: Policy PN1) is an internationally famous tourism destination which makes a major contribution to Bradford and overall district employment and economy. It can be said to better ‘punch above its weight’ than any other place in the region. As such, it is vital to include legislation to protect this and other major tourism destinations from harmful change that would diminish their benefit to the district economy.</p>	<p>Tourism and culture are aspects of the economic growth profile for the District, and as such these sectors will be supported through any revisions to EC1.</p>	<p>CSPR020</p>
	<p>11c. Haworth has established itself as an International</p>	<p>Tourism is a key aspect of the economic growth</p>	<p>CSPRQ079</p>

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	tourist destination in its own right. Its historical role within the Bradford area should not be impacted by development, indeed it should be protected and encouraged. And its Tourist Information Centre reinstated immediately.	profile for the District, and as such these sectors will be supported through any revisions to EC1.	
	12. Education and Skills		
	12a. Will the council realise that the fundamental problem with employability in the district lies with the under-achieving pupils and that educational attainment must be improved in order to produce a more skilled workforce? Indeed should education not be a critical part of the Core Strategy?	The Economy Chapter of the Revised Core Strategy now more heavily reflects the importance of skills and the fundamental part they play in economic growth.	CSPR039
	12a. We need inclusion to mean people with learning & physical disabilities having access to jobs as well otherwise these costs fall back to the Council via Adult social care	The Economy Chapter of the Revised Core Strategy now more heavily reflects the importance of skills and the fundamental part they play in economic growth.	CSPRQ066
	13. Sport & Economic Development		
	13a. Sport should be recognised as a key economic issue. Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are: • In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of	Sporting leisure is a key aspect of the economic growth profile for the District, and as such these sectors will be supported through any revisions to EC1.	CSPRQ077

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	<p>the England total. This placed sport within the top 15 industry sectors in England and larger than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting.</p> <ul style="list-style-type: none"> • Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England. • The benefits of playing sport include the well-being/happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering. • Consumption of sport benefits include the well-being/happiness of spectators, and the national pride/feel good factor through sporting success/achievement. • The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to be: Volunteering £2.7 billion, and health £11.2 billion. • Expenditure on sports related broadcasting in England was estimated to be some £2.3 billion in 2010. Some £3.9 billion was spent on sports equipment and £3.8 billion on sports clothing and footwear, with 72% of sales on clothing and 28% on footwear. Total sports related gambling spend in 2010 is estimated at £4.9 billion. The economic impact of sport in terms of GVA and employment is substantial. 		

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	<p>However, these measures only capture part of its economic value. For those who participate in sport there are health and well-being (or happiness) impacts, while those who watch sport can derive beneficial psychological effects. The 2012 Olympic and Paralympic Games showcased the wide-ranging positive effects that watching sport can have. Sport has a range of wider benefits to individuals and to society as a whole. Both consumption of and participation in sport can result in significant wider impacts. The key wider benefits are:</p> <ul style="list-style-type: none"> • The well-being or happiness of individuals through participating in sport – research reported by the Department for Culture, Media and Sport (DCMS) has identified the substantial benefit that participating in sport has for the individual concerned in terms of their well-being or happiness. • The benefit to individuals from improved health (both physical and mental) and, as a result of a healthier population, reduced costs to the National Health Service. Here again research has been undertaken to value the healthcare costs saved and the total economic value (a broader measure of the economic value of the health benefits). The annual value of health benefits generated by participation in sport are estimated to be £1.7 billion in terms of savings in healthcare costs and £11.2 billion in total economic value in 2011-2012. • The improved educational attainment of those that 		

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	<p>participate in sport. Participation in sport can increase student's motivation, improve their social relations with peers and persons in authority and can impact positively on self-discipline, time management and self esteem.</p> <p>The economic contribution to sport can also reduce youth crime, can have a positive impact on the environment for example by encouraging more people to walk or cycle which can reduce emissions and congestion. Overall, both in terms of economic impact and broader economic value it is evident that sport and sport-related activities make a very substantial contribution to the economy and to the welfare of individuals and society. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities.</p>		
	<p>14. Area based issues</p>		
	<p>14a. Bradford City Centre used to be busy and competitive as it had lower rates than Leeds. Businesses have moved and not been replaced - why? The City Centre is dire.</p>	<p>The policies with the Economy chapter prioritise Bradford City Centre for all major town centre uses. Sub-Area Policy BD1 also focuses on the regeneration of Bradford City Centre.</p>	<p>CSPRQ100</p>
	<p>14b. The area of apperly bridge is being swapped and this community will die if further development is allowed. To feed the commuter community to Leeds. Significant input is needed to allow services to cope.</p>	<p>Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public</p>	<p>CSPRQ083</p>

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	Allerley bridge station is already massively oversubscribed pushing commuters back to the roads	transport.	
	14c. Looking at the new developments around Apperley Bridge, these seem to bring very little to the Bradford District economy. They are marketed for commuters into Leeds and that is where people are working, shopping and eating out. What does this bring to Bradford other than inflated house prices?	Noted.	CSPRQ092
	14d. Good words but eg office space needed desperately in the Aire valley now. Northern powerhouse is a myth!	Noted. The Policies within the Economy chapter will look to focus office development within centres, including those within the Aire Valley.	CSPRQ026

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	1. General		
	1a. No comment	Noted.	CSPRQ016 CSPRQ026 CSPRQ055 CSPRQ107 CSPRQ112 CSPR004
	1b. Support	Noted.	CSPRQ030 CSPRQ056 CSPRQ060 CSPRQ099
	1c. Too vague to comment	No response required.	CSPRQ028
	1d. Again a statement rather than a conclusion, so is difficult to comment against.	No response required.	CSPRQ062
	1e. Too many times all the accepted rules are ridden over roughshod if a business promises to provide a couple of dozen jobs. All businesses must respect the area they are building in and abide by the rules. Also planners must not let themselves be bullied!	Noted.	CSPRQ069

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Table 11	<p>1f. "We welcome the acknowledgment in Table 11 of the Scoping Report that the NPPF outlines that significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development.</p> <p>In taking forward this approach in considering how the Core Strategy may be amended as part of its Partial Review, it should be central to the Council's thinking that the delivery of an appropriate number and variety of housing opportunities is key to ensuring the area's economic growth, to attract and retain skilled workers and prevent outward migration from the District slowing economic growth or adaptivity."</p>	<p>The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this. A key aspect of this work will be the business surveys, which will supply a geographic supply and demand analysis that will give the Council an indication of what and where existing businesses want to grow and new ones want to invest. There will be strong linkages between the projected levels of economic growth and an appropriate housing requirement to facilitate the creation of new job opportunities.</p>	CSPR001
	<p>1g. The Council's Core Strategy document presented to the Inspector contained a new job projection of 2897 per annum, a third as high as the one quoted above . During the Examination the Council pruned this figure overnight to 1600. We have no confidence in this figure either, and we believe that a more realistic figure should be set based upon a review of the factors mentioned below. As with the housing requirements, it does the District no service to set targets which are either unnecessarily high or unachievable within the timeframe, as land should be regarded as a precious resource to be conserved in the same way as energy. The Council should radically review its Economic Strategy for the Bradford District (2018-2030) in the</p>	<p>The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this.</p>	CSPRQ114

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	<p>light of new matters arising since its adoption or for which provision has not been made, including;</p> <ul style="list-style-type: none"> - the latest population growth projections; - the government's policy regarding work permits for EU citizens going forward affecting lower paid workers particularly in the health and hospitality sectors; - the post-Referendum downturn in national economic growth, and (if it should so turn out) the even greater slowing of the economy following a hard Brexit.; - the specific effects on Bradford of the withdrawal from the EU and particularly the loss of European Regional Aid without guaranteed replacement from central government; - the loss going forward of the support of the European Bank for Reconstruction and Development; - the crisis affecting the retail sector, including the withdrawal of household names from the high streets in many cities and the bankruptcy of many other retail businesses; - the demographic downturn affecting further and higher education over the next five years resulting in short term contracting student numbers and courses; and the more serious long term consequences of government policy relating to student fees and funding shortages in the sector. Any contraction of higher education provision or transfer into apprenticeship and other in work training might lead to a review of the amount of student accomodation required and the numbers of students contributing to the local economy. - the projection of 14,250 net additional Full Time 		

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	<p>Equivalent Jobs by 2060 (359 per annum) arising from the Council's Northern Powerhouse Rail Bradford Growth Strategy should be regarded as a political aspiration and not the basis for serious economic planning and certainly not for land allocation. In conducting the Partial Review the Council should take a hard look at the outcomes for Crossrail, where a two year delay (minimum current projection) has completely destroyed the TfL Business case, the delays that have already occurred to HS2 before construction has commenced and also at the government's back-track on trans-pennine electrification. Whilst most citizens in the north would be delighted to see a Northern Powerhouse growth spurt resulting from radical rail developments, a realistic view should be taken for the purpose of planning strategy of its likely outcome and its likely effect on job creation within the District within the Review Period.</p>		
	<p>1h. Economic Growth (Policy EC1, EC2 and EC3)- The Council wants to enable a strong and vibrant economy to flourish and businesses need land and premises to support jobs. It is important that the economic growth in the district is aligned with housing growth and that a wide range of high-quality housing is provided across the district to attract and retain employees. This is recognised in the Governments 'Industrial Strategy Building a Britain fit for the future' (November 2017) which states "Housing is vital to the</p>	<p>The revised policy will have strong connections to the Bradford Economic Growth Strategy and will act as a catalyst to job and wealth creation. The policy documents and supporting evidence bases will establish strong linkages between the projected levels of economic growth and an appropriate housing requirement to facilitate the creation of new job opportunities.</p>	<p>CSPR018</p>

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	<p>economic success of our cities and regions... The government wants to support places with ambitious and innovative plans to build additional homes where they are needed, and which will support wider economic growth. We want to support greater collaboration between councils, a more strategic approach to planning housing and infrastructure, more innovation and high-quality design in new homes and creating the right conditions for new private investment”.</p>		
	<p>1i. Whilst the Council's intention to review Policy EC2 in order that it continues to provide an up to date and justified position on job creation levels and associated land requirements is understood, it should be recognised that the overarching national planning policy position in encouraging and supporting economic growth remains largely unchanged since the preparation and adoption of the Core Strategy. In particular Paragraph 80 of the revised NPPF states that: <i>“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”</i></p>	<p>The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this. There will be strong linkages between the projected levels of economic growth and an appropriate housing requirement (HO1) to facilitate the creation of new job opportunities. The 'Review takes account of a range of strategies at a local and sub-regional level.</p>	<p>CSPR021</p>

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	<p>Paragraph 81 also states: “[Planning policies should].set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration”</p> <p>Taking this into account it is therefore essential that any revisions to Policy EC2 reflect the current economic ambitions of the Council and their local stakeholders. Of particular relevance, therefore, is the Bradford Economic Strategy 2018-2030 produced by the Bradford District Economic Partnership (as referenced above in the context of our comments on the review of Policy Ho1). This document shows a clear ambition to achieve high levels of economic growth, setting out the following objective:</p> <p><i>“We aim to be the UK’s fastest growing economy over the coming decade, increasing the value of our economy by £4 billion, getting 20,000 more people into work and improving the skills of 48,000 residents.”</i></p> <p>This equates to an increase of 1,667 jobs per annum (2018-2030), a figure that is very closely aligned with the 1,600 jobs per annum employment target contained within Policy EC2 the adopted Core Strategy.</p> <p>This strategy emphasises that Bradford has a strong business base with the number of businesses increasing by over 20% over the last three years, faster than the Leeds City Region and UK growth rate.</p>		

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	<p>The Council has also set an ambitious goal of employing 500 apprentices per year and key sites are being unlocked for employment uses including Enterprise Zones at Gain Lane, Parry Lane and Staithgate Lane along the M62 corridor. In addition, commitments to improve connectivity across the region including new train services from Northern Connect, a Northern Powerhouse Rail Station in Bradford City Centre, and Leeds Bradford Airport Expansion will also result in new jobs and increased economic growth.</p> <p>In addition to the Bradford Economic Growth Strategy, other documents also seek to support and facilitate ambitious economic growth in the district. These include:</p> <p>1 The LEP's Leeds City Region Employment and Skills Plan sets out a number of key aspirations including reducing levels of unemployment and inactivity, increasing apprenticeships, maximising the employment opportunities associated with major capital and infrastructure schemes, maximising training and raising skills levels and contributing towards the Strategic Economic Plan objective of 35,700 net additional jobs by 2036.</p> <p>2 The Bradford Chamber for Commerce's 'Creating Space for Future Success Ensuring Growth Happens in Bradford' report makes it clear that the creation of job opportunities needs to keep pace with one of the fastest growing populations, with a particular focus on strengthening the existing manufacturing base and</p>		

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	<p>strong entrepreneurship culture.</p> <p>Taking account of the above, it is therefore clear that there is an alignment between these documents in seeking to enhance the economic prospects of the District. The Core Strategy will also play an integral part in this in setting the land use planning context and strategy to allow such targets to be met. On this basis it is considered essential a revised Policy EC2 is also in alignment with these wider strategies and should make explicit reference to supporting the delivery of at least 1,667 jobs per annum.</p> <p>As our comments on Policy HO1 make clear, it is then essential that such a target is aligned with an appropriate District-wide housing requirement to ensure that sufficient homes are delivered to allow such a jobs creation target to be achieved.</p>		
	<p>1j. One of the four key opportunity areas for growing the economy which is identified in Bradford's latest Economic Strategy is 'using the unique architecture, heritage and cultural assets to create compelling investment propositions and an environment for growth'. The District's historic mills are identified as being one of the catalysts for growth.</p> <p>The Plan needs to provide an appropriate framework which will help to encourage the underused potential of its Mills (and the vast amounts of underused and vacant floorspace they provide) to be brought back</p>	<p>The Employment Needs Assessment and Land Review will undertake a review of existing employment stock across the District to ascertain whether or not it is still fit for purpose. The Council will actively encourage the reuse of existing industrial premises, such as Mills, to be reused for employment purposes where appropriate to do so. The Council currently safeguards employment uses through the existing CS Policy EC4 (C), which requires applicants proposing the alternative use of all employment sites to demonstrate it is no longer required for its</p>	<p>CSPR004</p>

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	into use so that their full potential to the economy of the District can be realised.	existing employment use.	
	2. Investment in Bradford		
	2a. It is ok allocating employment land the issue is getting companies to invest in new factories etc. and of course we do not know the effects of Brexit.	Noted. The Economy Chapter establishes a planning framework for the District to facilitate investment and deliver new employment floor space and jobs.	CSPRQ008
	2b. Who in their right minds would want to set up in Bradford? No, really! You have two hopes of hitting this target: Bob Hope and No Hope.	Noted. The Economy Chapter establishes a planning framework for the District to facilitate investment and deliver new employment floor space and jobs.	CSPRQ038
	3. Leeds City Region		
	3a. Initiatives that create competitive advantage for both Bradford district and the Leeds City region are supported, as there will be spin offs that will benefit both in the Leeds City region and Craven. This approach is supported in principle.	The Council acknowledges the support from the neighbouring authority of Craven District Council.	CSPR019
	4. Business Support		
	4a. What a sad indictment of the councils aspirations that their policy only aims to support 1,600 new jobs. The councils unwillingness to support business - retails for example has, and will lead to considerably more than 1,600 job losses each year.	Noted. The Economy Chapter establishes a planning framework for the District to facilitate investment and deliver new employment floor space and jobs. This policy framework will also support existing businesses within the District and	CSPRQ105

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		allow expansion when needed.	
	4b. Supporting Business and Job Creation	The Core Strategy Review will provide a strategic framework to support businesses and job creation in line with the recommendations of the Employment Needs Assessment and Land Review.	CSPR033
	5. Job Growth		
	5a. In order to achieve a contained balance of job growth and housing provision within the District (plus say 75 % containment) employment land supply will need to fully meet the economic and social needs of the District's population. The provision of 135 hectares represents a bare minimum when set against the socio-demographic requirements of the growing population and the economic aspirations of the LEP and Bradford Council. The job growth figures and the consequent employment land requirement need thorough review.	The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this. There will be strong linkages between the projected levels of economic growth and an appropriate housing requirement (HO1) to facilitate the creation of new job opportunities. The 'Review takes account of a range of strategies at a local and sub-regional level.	CSPRQ070
	5b. The economic aspirations of Bradford identified a need for an increase of 1,604 jobs, equating to 28,867 jobs over the Plan period. It is our position that the aspirations of the Council for economic growth is important. Indeed, the level of job growth in Policy EC2 was therefore amended to 1,600 jobs per year, to	The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this. There	CSPR028

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	ensure consistency between housing and economic strategies. The housing target set was also influenced by the priorities of the LEP's SEP to ensure economic growth.	will be strong linkages between the projected levels of economic growth and an appropriate housing requirement (HO1) to facilitate the creation of new job opportunities. The 'Review takes account of a range of strategies at a local and sub-regional level.	
	5c. 1600 new jobs annually will not be enough for the occupants of the 2477 new houses that are planned annually!	The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this. There will be strong linkages between the projected levels of economic growth and an appropriate housing requirement (HO1) to facilitate the creation of new job opportunities. The 'Review takes account of a range of strategies at a local and sub-regional level.	CSPRQ091
	5d. Yes but timescales for jobs growth would need to be realistically aligned with the expected delivery dates of benefits from any inward investment.	The Economy Chapter establishes a planning framework for the District to facilitate investment and deliver new employment floor space and jobs.	CSPRQ111
	5e. There seems to be an over-reliance on retail. What measures are the council taking regarding promoting and attracting the new tech and renewable industries to the city? Should these be the focus for new jobs and	The Council will look to promote job and business growth across a number of sectors, including retail, tech and renewable industries. The Council shall look to facilitate economic growth across the	CSPR040

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	businesses in the city? Should we be creating a "Silicon Mill" environment with incentives for entrepreneurs?	District, with the outputs of the Employment Needs Assessment and Land Review influencing broad geographic location, numbers of jobs and the floorsapce / land required to deliver this.	
	6. Job creation		
	6a. It takes more than land to create jobs - although I must admit it's a good start	Noted.	CSPRQ061
	6b. I would support job creation.	Noted.	CSPRQ048
	6c. What progress has been made to achieve new jobs target to date?	The Annual Monitoring Report is the key evidence base for how the Core Strategy is meeting the performance indicators set out in the policy framework. The Annual Monitoring Report does not specifically monitor jobs, just the level of employment land and floor space delivered.	CSPRQ108
	6d. Employment is essential and will be very difficult to achieve so be realistic	The Policies within the Economy chapters will set realistic targets for employment, all of which will be justified by evidence set out within the Employment Needs Assessment and Land Review and other supporting documents.	CSPRQ037
	6e. Yes provision of jobs is needed. Income needs to be higher than being on benefits though.	Employment Needs Assessment and Land Review is the primary source of evidence underpinning the policies of the Economy Chapter and makes reference to earning and wage levels	CSPRQ029

Appendix 13: Policy EC2 - Comments Received and CBMDC Response

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		in the Bradford District.	
	6f. These jobs should be local people and apprenticeships in all areas for our young people. Should be permanent contracts at the end of training periods, decent pay for apprenticeships with job security, no zero hours no work no hope approach.	The Economy Chapter of the Revised Core Strategy now more heavily reflects the importance of skills and the fundamental part they play in economic growth.	CSPRQ063
	6g. Jobs are important for the whole district and anything which supported growth, vitality, and increased employment would have my support also.	Noted.	CSPRQ058
	6h. Creating additional employment is very welcome, but it should be possible to increase employment densities with new ways of working reducing the need for additional land. Industries with low employment densities should not be encouraged.	The Council is exploring aspects of increasing employment densities through intensification of existing employment uses, home working etc, which have been supported in the Policies of the Economy Chapter.	CSPRQ051
	6i. This might be obvious, but how does 1,600 jobs to 2030, equate to 42,100 homes? Can we set the bar any lower?	The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this. There will be strong linkages between the projected levels of economic growth and an appropriate housing requirement (HO1) to facilitate the creation of new job opportunities.	CSPRQ036
	6j. Brexit will not deliver these jobs	No response required.	CSPRQ089

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Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	6k. Jobs where??	No response required.	CSPRQ064
	6l. We need more jobs than this. Aren't we the youngest city so all those youngsters need jobs.	The Policies within the Economy chapters will set realistic targets for employment, all of which will be justified by evidence set out within the Employment Needs Assessment and Land Review and other supporting documents.	CSPRQ032
	6m. You don't just create jobs by building on land ! Look at all the buildings owned by the council that are not used effectively - Bingley pool for one which you don't maintain and is under threat of closure - there are hundreds across the district - set up working parties with business leaders and take proper advice before making appalling decisions and spending tax payers money on decisions made by ignorant councillors	The Council will continue to work closer with key stakeholders through the plan production process, including the business community.	CSPRQ006
	6n. How on Earth will this Council attract high quality jobs?	Noted. The Economy Chapter establishes a planning framework for the District to facilitate investment and deliver new employment floor space and jobs.	CSPRQ025
	7. Skills		
	7a. Current national job losses make it more difficult to plan realistic job creation in a post-industrial society. The severe shortage of skills in service areas such as healthcare suggests that more emphasis must be concentrated on training new staff in purpose-built	The Economy Chapter of the Revised Core Strategy now more heavily reflects the importance of skills and the fundamental part they play in economic growth.	CSPRQ022

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	centres.		
	7b. Employment land sites would be welcomed for the whole of the Bradford district.	Noted.	CSPRQ033
	8. Industrial Sector		
	8a. We must beef up our industrial sector. The chemical and pharmaceutical industries should be heavily encouraged here. We need to target the gay community which has always been entrepreneurial ... fewer family issues to inhibit the adventurous spirit of gay people wishing to start businesses.	The Employment Needs Assessment and Land Review evidence base document will set out a number of economic growth forecasts for the District, which presented approximately how many new jobs will be created over the plan period the land requirement to deliver this. A key aspect of this work will be the business surveys, which will supply a geographic supply and demand analysis that will give the Council an indication of what and where existing businesses want to grow and new ones want to invest. Site will be allocated within the Site Allocations DPD.	CSPR030
	9. Infrastructure		
	9a. Ensure the infrastructure is in place for people to get to work using public transport	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ006
	9b. transport is the key a silsden bypass would help people commute from wharfedale to airedale	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver improvements	CSPRQ020

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		to the highways network.	
	9c. Do any of these planning issues cover local taxes and rents for small businesses? There are plenty of standing buildings that could be adapted for a wide range of economic activity. There shouldn't be an assumption that new businesses needs to destroy more countryside.	Noted. The Policies within the Core Strategy look to maximise the use of Previous Development Land and exploring the intensification of employment uses to create jobs.	CSPRQ014
	10. Links to Housing		
	10a. Build the employment facilities in parallel with the housing, maybe giving housing priority to those working nearby.	The Council has sought to align the key evidence bases relating to the requirement for employment (Employment Needs Assessment and Land Review) and housing (SHMA).	CSPRQ034
	10b. If the council pursues the policy of gaining new Jobs they should also increase the affordable housing to go with those new jobs	The Council has sought to align the key evidence bases relating to the requirement for employment (Employment Needs Assessment and Land Review) and housing (SHMA).	CSPRQ073
	11. Accessibility		
	11a. employment areas should be with-in walking or cycling distance	The Council will look to maximise the allocation of employment sites within sustainable locations which are easily accessible by walking and cycling.	CSPRQ039
	12. Tourism & Farming		

Appendix 13: Policy EC2 - Comments Received and CBMDC Response

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	12a. The Parish Council supports this policy. Special consideration to protect tourism and farming in the Parish is essential as they provide the main employment for the area.	Tourism and agriculture are aspects of the economic growth profile for the District, and growth in these sectors will be considered when establishing future level of jobs growth and the floorspace requirements to delivery this.	CSPR0202
	Area based issues		
	13. Principal Towns		
	13a. Thoughts to increasing Commercial / Industrial land in the Bingley area?	Revised Policy EC2 establishes the levels of employment land to be planned for in each sub-areas of Bradford, Wharfedale, and Airedale which includes the town of Bingley.	CSPRQ027
	13b. Instead of building a new shopping area in Keighley at Coney Lane/East Parade - why not refurbish the existing shops in the town centre and encourage new stores to move into the town and use the land at Coney Lane for housing.	The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.	CSPRQ043
	14. Bradford City Centre		
	14a. For Bradford to thrive again, its city centre, its retail offering, its leisure facilities and restaurants must attract people into the city, and currently they don't. The city looks and feels run-down, not always safe, and can't (at present) compete with Leeds as an entertainment, dining and shopping venue. I believe	The policies with the Economy chapter prioritise Bradford City Centre for all major town centre uses. Sub-Area Policy BD1 also focuses on the regeneration of Bradford City Centre.	CSPRQ063

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	that is in large measure due to the Council's promotion of residential development OUTSIDE the city, and the ongoing accumulation of PDL sites which create 'holes' in the city's economic landscape. A possible answer is to start constructing quality, volume housing in the inner city, to keep people there, and look to businesses in retail, services, leisure and entertainment in the city to absorb the population and the increased footfall.		
	14b. Taking decades to do something with the Alhambra, refurbishing Jacobs Well and then deciding to knock it down! Proper, future proof planning is what is needed.	Noted.	CSPRQ100
	15. Villages		
	15a. Small villages do not need retail development. Local traders should instead be encouraged to flourish.	The Retail and Leisure Study 2019 will establish the level of retail need across the District and in conjunction with key stakeholders, the Council will plan accordingly through the Core Strategy and Site Allocations DPD.	CSPRQ079

Appendix 14: Policy EC3 - Comments Received and CBMDC Response

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	1. General		
	1a. No comments	Noted.	CSPRQ025 CSPRQ055 CSPRQ058 CSPRQ107 CSPRQ112
	1b. Support	Noted	CSPRQ059 CSPRQ060 CSPRQ111 CSPR020
	1c. Again a statement rather than a conclusion, so is difficult to comment against.	No response required.	CSPRQ062
	1d. It is unclear how these values have been arrived at ?	The Council will look to clarify any analysis underpinning any figures within the Policy during the review.	CSPRQ008
	1e. To vague to comment	No response required.	CSPRQ028
	1f. These assessments must also be subject to ongoing review.	The Policies within the Core Strategy are all linked to monitoring indicators and will be subject to statutory 5 year reviews following adoption.	CSPRQ022

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	should be the first priority. Cant have housing without commercial opportunity	The Council has sought to align the key evidence bases relating to the requirement for employment (Employment Needs Assessment and Land Review) and housing (SHMA).	CSPRQ026
	1g. just do it.	Noted.	CSPRQ045
	2. Economic Growth Priorities		
	2a. Economic Growth (Policy EC1, EC2 and EC3) The Council wants to enable a strong and vibrant economy to flourish and businesses need land and premises to support jobs. It is important that the economic growth in the district is aligned with housing growth and that a wide range of high-quality housing is provided across the district to attract and retain employees. This is recognised in the Governments 'Industrial Strategy Building a Britain fit for the future' (November 2017) which states "Housing is vital to the economic success of our cities and regions... The government wants to support places with ambitious and innovative plans to build additional homes where they are needed, and which will support wider economic growth. We want to support greater collaboration between councils, a more strategic approach to planning housing and infrastructure, more innovation and high-quality design in new homes and creating the right conditions for new private investment".	The revised policy will have strong connections to the Bradford Economic Growth Strategy and will act as a catalyst to job and wealth creation. The policy documents and supporting evidence bases will establish strong linkages between the projected levels of economic growth and an appropriate housing requirement to facilitate the creation of new job opportunities.	CSPR018

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	<p>2b. Our client has significant concerns regarding the Council's intentions to re-evaluate their economic growth priorities and strongly object to any proposals to do so.</p> <p>A significant amount of work and evidence was produced to support the Core Strategy and the economic growth aspirations were debated at length during the EiP. Nothing has changed in the intervening period since the Core Strategy was adopted in 2017 and there is no justification whatsoever to reverse the Council's ambitious economic growth.</p> <p>In our opinion, it appears the only reason the Council are re-considering their economic growth priorities is to retro fit this with the likely reduced housing target. If this is the case, it is wholly inappropriate and would fail to meet any of the tests of soundness set out in paragraph 35 of the Bradford continues to have severe economic and social issues, being one of the most deprived authorities in the country with some of the highest levels of unemployment. This context has not changed since the Core Strategy was adopted in 2017 and any reduction to the Council's economic growth aspirations would only exacerbate the current issues in the City.</p> <p>The Council are keen to drive forward growth in sectors such as modern manufacturing and knowledge intensive industries, such as SMEs and design and technology industries and this is keen to their economic growth aspirations.</p> <p>However, Bradford has not only a quantitative need for</p>		CSPR034

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	<p>additional employment land, but also a qualitative need as it is widely acknowledged that current employment land stock is small in scale, poor quality and unsuitable location, which are not conducive to enabling the Council to meet their economic growth aspirations.</p> <p>This provides context as to why the Council are supportive of our Client's land at Apperley Bridge coming forward and have specifically identified an area north of Apperley Bridge railway station as an economic growth area and this site offers something the Council can not currently deliver i.e. a large-scale employment site, adjacent to a railway station and within close proximity of Leeds Bradford Airport. Without this site coming forward, there are concerns that the Council will fail to meet their own economic growth aspirations.</p>		
	<p>3. Employment Land</p>		
	<p>3a. We strongly believe that a review of employment land need is required in conjunction with a further review of the Economic Strategy for Bradford. The Council has never justified the figure of 100 hectares for employment land within the Regional City other than as an aspirational figure, and as the figure was not revised downward during the Examination hearings, despite the substantial reduction in job projection. It seems to us that we are looking at an historical estimate based upon assumptions which</p>	<p>The Policies within the Economy chapter are considered to fully reflect the aspirations of regional, sub-regional and local economic strategies, including the Bradford Economic Growth Strategies.</p>	<p>CSPRQ114</p>

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	<p>may have limited relevance today. In reviewing the actual employment land requirement we also believe that the Council should skew its Economic Strategy toward employment uses which are efficient in land use relative to job numbers provided. This would militate against automated warehousing, for example, and encourage a more concentrated highrise approach to office, IT and other tech uses.</p>		
	<p>3b. Creating additional employment is very welcome, but it should be possible to increase employment densities with new ways of working reducing the need for additional land. Industries with low employment densities should not be encouraged.</p>	<p>The Council is exploring aspects of increasing employment densities through intensification of existing employment uses, home working etc, which have been supported in the Policies of the Economy Chapter.</p>	<p>CSPRQ051</p>
	<p>3c. I question the concept of "employment land". The equation: new economic activity=new build on new land, is not right and distracts thinking from other possibilities.</p>	<p>Noted. The Policies within the Core Strategy look to maximise the use of PDL and the Council is exploring aspects of increasing employment densities through intensification of existing employment uses, home working etc, all of which have been supported in the Policies of the Economy Chapter.</p>	<p>CSPRQ014</p>
	<p>4. Employment Land – Airedale</p>		
	<p>4a. Surely people commute to work and so we just need jobs regardless of location so just have one overall target for the area ? The transport infrastructure plays a significant part in increasing</p>	<p>The Council will revise land requirements in strategic locations (Airedale, Wharfedale and City of Bradford) in line with key outputs from the Employment Needs Assessment and Land</p>	<p>CSPRQ037</p>

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	employment and must be considered together	Review. It should be noted that these strategic locations (and the sites contained within them) shall be rigorously appraised for impacts upon the transport networks using the updated Strategic Transport Model. Dialogue on this matter through the existing DTC networks, and targeted sessions with appropriate neighbouring authorities and key stakeholders.	
	<p>4b. The direction of 30 hectares of employment land to the Airedale corridor under current evidence is noted. Airedale corridor - It is requested that as part of any update to the evidence base, the partial review of the local plan takes account of transport modelling around Steeton and Silsden whilst also considering transport impacts and modelling around Glusburn, Crosshills and Sutton in Craven district.</p> <p>In particular, we request that traffic impacts arising from employment growth in the Airedale corridor in particular be taken into account as part of a partial review of the local plan, as there is a potential for impact in Craven district.</p> <p>We would be pleased to engage further on this matter as part of Duty to Cooperate discussions in due course.</p>	The Site Allocations DPD will be subject to strategic transport modelling. This will detail the impacts of employment land (and other land uses) upon the transport network and the Council will consider interventions to alleviate this.	
	4c. Thoughts to increasing Commercial / Industrial land in the Bingley area?	Revised Policy EC2 establishes the levels of employment land to be planned for in each sub-areas of Bradford, Wharfedale, and Airedale which includes the town of Bingley.	CSPRQ027

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	4d. Recent issues on a planning application in Keighley, highlight that employment land requirement requires urgent review. Also consider re-use of older listed buildings.	Noted. As part of the review of the Core Strategy, employment land requirement for the District is being reconsidered. The reuse use of existing buildings and other employment uses will be considered in the delivery of jobs over the plan period.	CSPRQ108
	5. Employment Land - Wharfedale		
	5a The potential of Wharfedale to deliver more job growth in expanding industrial service sectors is not adequately recognised in the provision of only 5 hectares of land. This should be doubled to 10 hectares. The new employment land review and needs assessment are long overdue.	Noted.	CSPRQ070
	5b. 5ha for Wharfedale against 30ha looks a bit out of balance. Will the use predominantly wealth creating manufacturing?	Noted. The policies within the Economy Chapter will target a number of commercial sectors dependant on the sub-area.	CSPRQ034
	5c. What type of jobs are created in the Wharfedale corridor which supports the needs as Local Service Centre with around 3,000 homes for the area. Additionally, what type of employment would yield sufficient income to be able to afford a home in the Wharfedale corridor? The same question would also apply to the Airedale Corridor, for specific settlements.	Noted. The policies within the Economy Chapter will target a number of commercial sectors dependant on the sub-area.	CSPRQ036
	5d. I feel the Wharfedale requirement should be larger.	Noted.	CSPRQ048

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	<p>5e. It is obvious from recent history that manufacturing and distribution companies have been leaving The Wharfedale Corridor (also areas such as Yeadon and Rawdon within Leeds City Council's area) because the road links are so poor and the traffic too slow to give them ready access to routes to the North, South or East. Even so, the roads to the West, particularly the A65, are so congested, and go through so many bottlenecks such as Ilkley and Skipton, that the preferred route is to the South to join the M62. It is therefore pointless and flies in the face of experience to set aside land in the West of Bradford District for companies which need to move goods. It has been beneficial to relocate industry to the South, and the M62 corridor for those reasons. In addition, the ONS studies of employment and skills show that there are characteristic differences in the skills and occupational profiles of the labour force in the City of Bradford and in Wharfedale, with the latter focused on managerial, creative and intellectual skills. That skill-set is not demanding of large spaces in the way that manufacturing, distribution and warehousing are, and CBMDC already recognises this.</p>	<p>Noted. The policies within the Economy Chapter will target a number of commercial sectors dependant on the sub-area.</p> <p>The Economy Chapter of the Revised Core Strategy now more heavily reflects the importance of skills and the fundamental part they play in economic growth.</p>	CSPRQ067
	<p>6. Employment Land – Craven Ward</p>		
	<p>6a. Will my Craven Ward have employment sites or will the Council continue to build houses on them?</p>	<p>The Core Strategy Partial Review will propose a broad spatial distribution of employment land / floorspace across the District, but this will not be on a ward-by-ward basis. The Site Allocations</p>	CSPR030

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		DPD will allocate specific sites for employment uses across the District, based upon the broad spatial distributions set out in the Core Strategy DPD.	
	7. Utilise empty buildings & fair rents		
	7a. Yes revise it and utilise buildings that are empty !!!!!	The reuse use of existing buildings and other employment uses will be considered in the delivery of jobs over the plan period.	CSPRQ006
	7b. Charge fair rents to attract small businesses	Noted.	CSPRQ101
	8. Transport		
	8a. This needs co-ordinating with road and transport planning. The roads in Wharfedale are already choked. The Keighley bypass at rush hour is very busy and with long tail backs into Keighley. This is a cost to business, handicapping them from the start.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver improvements to the transport network.	CSPRQ041
	8b. Put work in to the employment black spots, people have to pay to travel by bus or rail, car parking charges etc all impact in your ability to maintain work and pay for living costs.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver improvements to the transport network.	CSPRQ063
	8c. Rather than dictate where the land should be made available, it is more important to ensure the labour force has sufficient transport systems to access same.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver improvements to the transport network.	CSPRQ061

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	8d. As before, the needs of any local community should come before any new employer setting up in their area. Things to take in account must be things like emissions, extra traffic, how many lorries, vehicle emissions.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver improvements to the transport network.	CSPRQ069
	9. Infrastructure		
	9a. More schools, doctors, public services	Noted.	CSPRQ089
	10. Land for Housing considered		
	10a. If Land is made available for employment use, Housing land should also be part of the mix along with services for the industry and housing such as Supermarkets and leisure	There will be strong linkages across policies for all land uses and the Council will exercise flexibility when considering sites for the allocation within the Site Allocations DPD.	CSPRQ073

Appendix 15: Policy EC5 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General		
	1a. No comment	Noted	CSPRQ026 CSPRQ055 CSPRQ107 CSPRQ112 CSPR003 CSPR019
	1b. Support	Noted.	CSPRQ002 CSPRQ048 CSPRQ111
	1c. We support this review but it must be carried out quickly and efficiently in order not to delay delivery of the revised CS and the new Allocations DPD	Noted.	CSPRQ070
	1d. Again a statement rather than a conclusion, so is difficult to comment against.	Noted.	CSPRQ062
	1f. "whether the retail hierarchy needs altering" means exactly what?	The Council will look to clarify the language used within the Core Strategy.	CSPRQ061
	2. Bradford City Centre & retail sector decline		
	2a. In Bradford, the existing retail area is spread	The Council is currently updating the Retail and	CSPR004

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	<p>across a large part of the City Centre. Within this area, there is already a high vacancy level. With the current changes that are taking place in the retail sector, it is almost inevitable that the Plan will need to plan for some contraction in the extent of the existing retail area in order to achieve a more focused, vibrant, retail core (an approach which has already been used in other Cities elsewhere in the Country). As part of such an approach, however, it will be necessary for the Plan to consider what type of strategy it needs to put in place for managing the buildings and areas where retailing is no longer the principal land use.</p> <p>With the current difficulties facing retailing, it is becoming increasingly apparent that, in order for the traditional retail areas to succeed, strategies for these areas may need to be more flexible than they have done in the past. Thus, the Plan is likely to need to make it easier for one use to change to another or to enable temporary 'pop-up' uses to become established - especially those which will assist the delivery of a vibrant City centre. However, it is essential that any increased flexibility does not compromise the "quality" that is on offer.</p>	<p>Leisure Study, which will be the primary evidence base for proposing any changes to primary shopping areas (PSAs) and changes to acceptable uses within centres across the District. Changes to PSAs and centre boundaries will be made via the Site Allocations DPD and any potential review of the Area Action Plans (AAPs).</p>	
	<p>2b. With the retail (High St-Shopping Centres) in decline due to on-line purchasing growth the retail hierarchy needs review. More support should be offered and allocated to small local retailers.</p>	<p>The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.</p>	<p>CSPRQ108</p>
	<p>2c. With the current problems affecting the retail</p>	<p>The Retail and Leisure Study 2019 will establish</p>	<p>CSPRQ022</p>

Appendix 15: Policy EC5 - Comments Received and CBMDC Response

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	sector, more emphasis should be placed on likely future needs.	the level of retail need across the District and in conjunction with key stakeholders, the Council will plan accordingly through the Core Strategy and Site Allocations DPD.	
	2d. I agree with the views that many retail premises that are currently not in use, could be returned to their original purpose i.e. residential. This would improve the visual impact and help to reinvigorate town and village centres.	Policy EC5 is considered to give sufficient flexibility to allow change of uses, where it is deemed acceptable.	CSPRQ080
	2e. Retail is decreasing everywhere current vacancies will not be filled. These should be used for housing purposes	Policy EC5 is considered to give sufficient flexibility to allow change of uses, where it is deemed acceptable.	CSPRQ059
	2f. Retail is undergoing major upheaval. Finding new uses for retail buildings such as conversions for dwellings should be actively pursued. Maintaining the vitality of shopping centres may require some reduction in their size.	Policy EC5 is considered to give sufficient flexibility to allow change of uses, where it is deemed acceptable.	CSPRQ051
	2g. retail needs to be promote with-in town centres not on the out skirts to avoid a derelict centre	Policy EC5 priorities retail within in-centre locations.	CSPRQ039
	2h. There seems little point in increasing the capacity for new retail developments considering the number of empty units in Bradford city centre	The Retail and Leisure Study 2019 will establish the level of retail need across the District and in conjunction with key stakeholders, the Council will plan accordingly through the Core Strategy and Site Allocations DPD.	CSPRQ018

Appendix 15: Policy EC5 - Comments Received and CBMDC Response

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	<p>2i. The number of empty existing shops suggests that either there is too much capacity already, or it is in the wrong place. With the shift to online shopping, obviously something should change. Parking problems can make existing shops not viable, and the council should resist the gradual erosion of parking that would support shops in favour of residents parking schemes, where home owners have bought a cheap house with no parking provision and see the councils provision of residents-only parking permits as a good way to increase the value of their house - but it comes at the expense of the local community. A focus on sport provision needs to be woven through the plans. It seems to me that the most useful and universally used (I.e. by many sectors of the community) facility is a good quality, up to date, swimming pool.</p>	<p>The Retail and Leisure Study 2019 will establish the level of retail need across the District and in conjunction with key stakeholders, the Council will plan accordingly through the Core Strategy and Site Allocations DPD. Policy TR2 covers the issue of parking within new developments.</p>	<p>CSPRQ041</p>
	<p>2j. High streets are currently struggling due to the internet and business rates need to be looked at to ensure stores can survive, Darley Street says it all.</p>	<p>Noted.</p>	<p>CSPRQ008</p>
	<p>2k. What can I say, there's a decline in our High Streets, so the vitality and viability needs looking at. Having identified this as a concern, why are we seeking to increase parking charges district wide? There's a link between parking and retail foot fal.</p>	<p>The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.</p>	<p>CSPRQ036</p>
	<p>2l. Again, your assumption is: nothing can happen or develop or grow without the interference of politicians and bureaucrats. The best way to see what people</p>	<p>Noted.</p>	<p>CSPRQ014</p>

Appendix 15: Policy EC5 - Comments Received and CBMDC Response

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	need, want and can do is to step back a bit, get out of their way and respond supportively to their activities.		
	2m. Council tax is too high for many small shop owners, why not charge initially a lower tax	Noted.	CSPRQ101
	2n. Too many retail buildings are in a shocking state. I'd like to see some compulsory purchase and redevelopment by a joint council /construction-company partnership.	The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.	CSPRQ033
	2o. The key is to ensure that these become centres for leisure, food, coffee, services, etc. The high street is only going to become tougher for traditional retailers	Noted. The Council acknowledges leisure is a key aspect of prosperous highstreets and EC5 acknowledges this and plans accordingly.	CSPRQ007
	3. Out of town developments		
	3a. Suggest that 'out of town' development is unsustainable and presumably is itself under threat from on-line retailers. Any creative encouragement of town centre activity is welcome.	Policy EC5 priorities retail within in-centre locations.	CSPRQ056
	3b. Policy should encourage relocation of out of town centre retail back to town centre locations. Providing a presumption in favour of residential redevelopment for out of town centre retail sheds and large sites. This will help to deal with the current challenges to retail by reducing the overall excessive quantum of retail space and help focus retail activity on town centres supporting their growth and vibrancy.	Policy EC5 priorities retail within in-centre locations.	CSPRQ113

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	4. Small Independent retailers		
	4a. Please consider more support for small independents, especially in Bradford city centre.	The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.	CSPRQ035
	4b. The council should support small local companies as a priority as well as building big shopping centres	The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.	CSPRQ037
	5. Transport links		
	5a. Insist that all retail areas have sufficient public transport and there could be a change of attitude. Technically the car as we currently know and use it is in the situation cod the horse at the end of the 19th century. Transportation options are going to change.	Noted. The Transport and Movement Chapter establishes a planning framework for the District to facilitate investment and deliver better public transport.	CSPRQ033
	6. Equality		
	6a. Commission proper expert research on this by speaking directly to the public. Use the equalities act. Changing Places toilets should be implemented in retail and leisure facilities - equality for all	Noted.	CSPRQ006
	6b. Encourage late night licensing of pubs clubs and fast food establishments in City Centres, and cease all late night licensing, other than casual licensing, in	Noted. The Council acknowledges leisure is a key aspect of prosperous highstreets and EC5	CSPRQ050

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	shopping centres close to residential areas.	acknowledges this and plans accordingly.	
	7. Housing need		
	<p>7a. In view of the reduction in “housing need”, using the Government approved method, it is time for reconsideration of the Settlement Hierarchy, particularly having regard to the new measures for protection of the Green Belt. CBMDC has just given Planning Approval for construction on Bingley Road in Menston, a site which is known to have groundwater emergence and which – according to the most recent report, which was not even considered by Arup or Eddie Norfolk – is likely to result in flooding of the new Chartford Homes site and established properties in Menston. Menston simply cannot take the 600 new homes indicated in the Core Strategy and SHLAA, nor should it in view of the overall reduction in numbers of new homes needed. 600 new homes “for families”, even with some “affordable” and smaller properties, will probably add 2,000 people and around another 40% to our current population, with no extra facilities, no more school places, already over-subscribed medical services and only one street which can accommodate retail shopping. It is high time that Menston was removed from its current position in the Hierarchy and reinstated as a Local Growth Centre. Just because it has access to the (congested) A65, and has a (congested) railway station doesn't make</p>	<p>Noted. Please see updates to Housing Chapter of the Core Strategy Review.</p>	<p>CSPRQ067</p>

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	<p>this village – and that's what it is – suitable for cramming another 2,000 people in! With no employment locally! All that will result in is more traffic on the A65, A6038 and Moor Road which many people use to try and 'rat-run' to Shipley, Bingley and Bradford. It is very dangerous, and if Bradford Council continues to kmake it worse, CBMDC will have to be liable for the inevitable accidents, flooding of houses etc. Surely, some regard has to be taken of the capacity of existing settlements for the absorption of new housing? Already, semi-rural communities with limited facilities are becoming connected with the adjacent communities, contrary to Green Belt Policy and to the detriment of the social fabric of those communities. The influx of new residents who don't work locally means they simply sleep there and don't contribute to or mix in the community or its activities, until and unless they have children at the local schools (not always possible) which might cause them to integrate. Unfortunately, Bradford Council is dominated by urban dwellers who seem to have no concept of what it's like to live in a smaller community where you can know almost everyone and share in the community-strengthening activities. Important groups like Menston in Bloom and Menston Community Association (both of which undertake voluntary activities for the benefit of the community) are being reduced to dependency upon a diminishing group of older people, as the newcomers don't understand what they do and don't have time to participate, as they're</p>		

Appendix 15: Policy EC5 - Comments Received and CBMDC Response

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	commuting every working day. Time to re-think!		
	8. Bradford City Centre		
	8a. Moving the shoppers from one area to another of the City Centre has left deserted areas - use it for housing.	Policy EC5 is considered to give sufficient flexibility to allow change of uses, where it is deemed acceptable.	CSPRQ100
	8b. The Council needs to make the City centre more attractive for people to visit and also attract new retail otherwise it will become a utter ghost town. The Council needs to support the towns and local centres in the outlying areas of the district. Currently, the Council support is minimal. Free limited car parking would be a start. If local businesses in these area do not receive support they will simply close down and end up in the same way as Bradford city centre.	The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.	CSPR030
	8c. We have enough but the proposed spend on Darley Street is a waste of money.	Noted.	CSPRQ025
	9. Leisure facilities		
	9a. Turn part of the Odeon cinema into a council run swimming pool and health spa, this will attract loads of people	Noted.	CSPRQ009
	9b. The current development of lesiure in the city is not accessible by all and a disgrace. The people spoke up	Noted. The Council acknowledges leisure is a key aspect of prosperous highstreets and EC5	CSPRQ028

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	on this and were ignored regardless	acknowledges this and plans accordingly.	
	9c. Less retail space in Bfd, more leisure such as Odeon ,bars nightlife etc	Noted. The Retail and Leisure Study 2019 will establish the level of retail need across the District and in conjunction with key stakeholders, the Council will plan accordingly through the Core Strategy and Site Allocations DPD. The Council acknowledges leisure is a key aspect of prosperous highstreets and EC5 acknowledges this and plans accordingly.	CSPRQ045
Sport and Leisure	9d. It should be recognised that sport can contribute to the evening economy. A diverse local economy is one of the building blocks of a sustainable community, and the promotion of economic vitality is a central concern of regeneration initiatives which are seeking to tackle multiple challenges associated with declining industries, changing consumer demand, unemployment, skills gaps, under-investment. Sport has a potential role to play in all these, some of the direct and indirect contributions being: <ul style="list-style-type: none"> • Investment in physical fabric; • Catalyst for investment and regeneration; • Employment • Image enhancement for living, working and visiting; • Reducing workforce absence due to ill health; • Improving skills and qualifications. Town centres provide opportunities for sporting activities that attract multiple users and spectators such as leisure centres, football stadia and swimming pools. Such uses can assist in contributing to the vitality and viability of centres. Often leisure	The Council acknowledges sporting leisure is a key aspect of prosperous economy and the policies of the Economy Chapter acknowledges this and plans accordingly.	CSPRQ077

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	centres and sport facilities remain open beyond traditional shop opening hours bringing people into to the centres and contributing to an evening economy and contributing towards a sense of a safe community. Sport England has produced guidance on the economic value of sport and it can be viewed on this link: https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/ The siting of any new sport facility should be based on an evidence base in order to ensure that it will serve demand.		
	9e. We need more leisure activities such as gyms for all not just in Bradford.	The Council acknowledges leisure is a key aspect of prosperous highstreets and EC5 acknowledges this and plans accordingly.	CSPRQ064
	10. Fast Food Takeaways		
	10a. The current local planning guidance on fast food and takeaways needs to be extended so that it effective in all local centres and shopping areas, save for the City Centre. The ribbon development of such establishments has adversely affected many inner city residential areas-the City now has the highest number of takeaway establishments of any city in Yorkshire. It's generally accepted that fast food is contributing to the City's obesity crisis-and residents of the affected areas face litter, noise, environmental pollution and the debilitating effect of fast food rubbish on their streets The revised planning guidance should make a presumption in favour of any other chance of use for	The Council adopted the Hot Food Takeaway SPD in 2014, and this covers all development proposals of this type across the District.	CSPRQ019

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	takeaways, and in the case of larger establishments the Council should provide financial incentives for them to move into the City Centre. A change in the guidance would be an opportunity to reinvigorate local shopping centres		
	11. Apperley Bridge		
	11a. More retail required lower Apperley Bridge.	The Retail and Leisure Study 2019 will establish the level of retail need across the District and in conjunction with key stakeholders, the Council will plan accordingly through the Core Strategy and Site Allocations DPD.	CSPRQ088
	12. Ilkley		
	12a. Lets encourage retail footfall in Ilkley shall we! And while we are at it, bang up the parking charges to make even more money for central Bradford. How stupid is this council.	The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District. Policy TR3 covers car parking.	CSPRQ038
	12b. The library in Ilkley is a really valuable resource especially for a young family like ours, we enjoy browsing the books and borrowing books for our young child, attending rhyme time, and it is a good place to see adverts for events being held locally.	The Council acknowledges the importance of community facilities and plans accordingly through Policy Sub Area Policy WD1: Wharfedale and SC4.	CSPRQ017
	12c. If the recent plan for parking in Ilkley is anything to go by, Bradford Council place very low emphasis on supporting existing retail. The shops in Ilkley are just	The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the	CSPRQ081

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	<p>about surviving, but all the residents' parking which is proposed will probably be the final straw for some of the shops. The parking consultation (which was a complete waste of money - a lay person could have done a better job) proposed nothing to fix the parking problems, it merely moved them around. The consultation seems to have been window dressing to put in place a further income stream from Ilkley - parking permits will soon be charged for, pay and display parking systems will generate income, and probably the fines emanating from these two approaches will also be a net earner for Bradford Council. Bradford continues to use Ilkley as a cash cow in other regards; it takes money from traders who sponsor flower beds but does not pass on of this on to the Ilkley in Bloom drop which actually does the work not he flower beds; it 'sells' space at the Riverside Gardens to traders such as the Christmas Teepees without concern about the impact on the gardens and their enjoyment by residents for other purposes. Increasingly responsibility for services and facilities (such as the toilets, libraries, play grounds etc) are being passed across to the Parish Council and volunteer groups - who are all doing good work, but residents could be forgiven for thinking they are getting less and less back from Bradford Council for their council tax.</p>	<p>District. Policy TR3 covers car parking.</p>	

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	13. Keighley		
	<p>13a. I strongly believe that the former college site in Keighley, which has been demolished and now grassed over, should not be built on again. I think that the money would be better spent on renovating Victoria Hotel at the bottom of Cavendish Street. Car parking is available at the Sainsbury's supermarket opposite (long stay spaces could be negotiated). The open space at the top of Cavendish Street (former college site) provides a beautiful view of the moors in the background and provides perfect symmetry with the war memorial gardens on the other side of the road. I would suggest a sensory garden (accessible for all) with trees which would help to mitigate the environmental issues in Keighley town centre.</p>	<p>Noted. Open space is a key consideration of the Core Strategy and is covered within the Design and Environment Chapters.</p>	CSPRQ040
	<p>13b. As previously stated Keighley Town Centre shops should be refurbished and new stores encouraged to come into the town. The allocated site at Coney Lane should be used for housing. The derelict buildings on North Street should be bought by compulsory purchase by the Council and refurbished as offices. The present open green space at the top of Cavendish Street should be retained and the old Tech College building should be pulled down.</p>	<p>The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the District.</p>	CSPRQ043
	<p>13c. Keighley is now no longer attractive as a retail environment. Anything which could be done to rectify this would be a good thing. It used to be a pleasure to</p>	<p>The policies within the Economy chapter will establish a planning framework to support new investment and the existing businesses within the</p>	CSPRQ058

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	<p>go. As children we were taken to "town" as a treat with quality shops such as Clarkes (for shoes) which my parents had to save up for but wanted us to have the best, Ladybird for clothes etc. We have lost Marks & Spencer recently. We used to have a meal out (perhaps twice a year) at Parkers Cafe on Low street (silver tea-pots, cruets etc.) a real treat. In our village there is no cinema, no theatre, no large retail outlets (nor would we want them), but a wealth of community activities and a park which our Friends Group are working hard on a voluntary basis to improve. If viability and vitality is to return to our local area this is an important aspect to be considered.</p>	<p>District.</p>	
	<p>13d. This is illustrated very well in Keighley with the proposed new retail park land sitting derelict right in the centre of the town. No one has missed not having the shops which were proposed. Also the Airedale Centre has quite a few empty shops so if the ones in the good, established centre cant survive, how do we need a new centre? It would just take shoppers away from established retailers as there is a finite amount of money to be spent.</p>	<p>Noted. The Retail and Leisure Study 2019 will establish the level of retail need across the District and in conjunction with key stakeholders, the Council will plan accordingly through the Core Strategy and Site Allocations DPD.</p>	<p>CSPRQ069</p>
	<p>13e. Take a look at Keighley. There is a huge hole on East Parade, and the Victoria Hotel on the corner of East Parade are a eyesore. That is hardly ensuring the vitality and viability of the retail centre.</p>	<p>Noted.</p>	<p>CSPRQ109</p>

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	14. Local Centres		
	14a. Local centres especially in Haworth, Cross Roads and Stanbury should be protected at all costs, services like shops and doctors be where possible should be located within the village centres	Noted. Policy EC5 looks to safeguard retail uses within these locations.	CSPRQ054
	15. Open Spaces		
	15a. There are insufficient parks and open spaces, developers are being allowed to build, sell and walk away without contributing to the local area	Policy TR3 covers car parking.	CSPRQ089

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	1. General – no comments		
	1a. Craven District Council has no specific comments to make in this regard In addition to the comments made in January 2018 regarding Green Belt review methodology. Craven does not contain any areas of Green Belt but maintaining areas of separation between settlements in South Craven and settlements in Bradford district is a key consideration.	Comments noted. The Green Belt Review methodology specifically looks at settlements outside, but adjacent to the Bradford District boundary as part of its consideration of purpose 2: to prevent neighbouring towns from margining into one another.	CSPR019
	2. Support protection of the Green Belt		
	2a. Support	Comments noted.	CSPRQ007 CSPRQ030 CSPRQ063 CSPRQ064
	2b. Harden Parish Council supports this approach and has commented on local Green Belt issues as part of the Green belt review.	Comment / support noted.	CSPRQ112
	2c. Preserve green belt	Comments noted.	CSPRQ003 CSPRQ008 CSPRQ009 CSPRQ032 CSPRQ048

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			CSPRQ059 CSPRQ079
	2d. I like that Greenbelt has highest importance and should remain green at all costs.	Comments noted.	CSPRQ069
	2e. Since the late 1940's Green Belt policies have had a major and beneficial influence in preserving the identity of our communities and preventing urban sprawl. With a likely reduction in the overall housing requirement for the region we would ask for stronger safeguards to the Council's Green Belt policy and a reinforcement of the exceptional circumstances for the release of Green Belt land for development. The Green Belt should be protected at all costs.	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p>	CSPR020
	2f. Green belt is no longer a last resort but a first resort in Bradford. More brownfield sites must be used	A number of policies in the Core Strategy support and encourage the redevelopment of Brownfield land (e.g. SC5: Location of Development). The partial review has strengthened this approach in	CSPRQ028

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		Policy SC2: Climate Change and also reduced the number of settlements where Green Belt release will be required to meet the housing and employment needs of the District.	
	2g. I agree with a) but do think that there should be less density of development and more homes with gardens. It is not necessary to build on green belt.	The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy SC5). Providing homes with gardens invariably requires lower density developments which in turn requires more land. In order to meet the housing requirements of the District it will be necessary to release a limited amount of Green Belt land. This is on the basis of increasing the density of sites within existing settlements so that less Green Belt land is required. To develop at lower densities would therefore require the additional release of Green Belt land.	CSPRQ043
	2h. Green belt areas need to be maintained as Green Belt areas. Wording should not be included to allow re-defining of these spaces.	In order to meet the housing needs of the District there will need to be a limited amount of development on Green Belt land in some settlements. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released.	CSPRQ098
	2i. Total in agreement as mentioned before BROWNFIELD first,leave the countryside and green belt alone	In order to meet the housing needs of the District there will need to be a limited amount of development on Green Belt land in some settlements. The Council has explored the relevant options to limit the amount of Green Belt	CSPRQ002

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		land which will need to be released, including maximising the reuse of previously developed land. The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy SC5).	
	2j. Make as much use as possible of brownfield sites, but ensure that developments are spacious with gardens, playspaces and allotments	The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy SC5). Providing homes with gardens invariably requires lower density developments which in turn requires more land. In order to meet the housing requirements of the District it will be necessary to release a limited amount of Green Belt land. This is on the basis of increasing the density of sites within existing settlements so that less Green Belt land is required. To develop at lower densities would therefore require the additional release of Green Belt land. The Core Strategy requires the provision of open space in new developments (Policy EN1).	CSPRQ019
	2k. I firmly believe that Green Belt land should be used as a last resort	In order to meet the housing needs of the District there will need to be a limited amount of development on Green Belt land in some settlements. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land. The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy	CSPRQ018

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Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
		SC5).	
	2l. Green Belt and any green spaces should only be developed when there is no alternative. Former industrial land that is not in used should be subject to compulsory purpose and built on without delay.	In order to meet the housing needs of the District there will need to be a limited amount of development on Green Belt land in some settlements. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land. The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy SC5).	CSPRQ022
	2m. As stated above, why have so many of the brownfield sites already allocated planning permission been allowed to lapse. These sites should be taken back and high density affordable housing implimented before any consideration of any green space is utilised for housing. Green belt is there for a reason. To sto the whole area becoming as poluted as Leeds city centre. What is the point of building houses for people to live in if their quality of life isn't worth living?	Most Brownfield sites are in private ownership and therefore the Council cannot force landowners to develop. In order to meet the housing needs of the District there will need to be a limited amount of development on Green Belt land in some settlements. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land. The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy SC5).	CSPRQ024
	2n. I would like to see a sliding scale trade off between brownfield site/PDL and greenbelt that has been marked for potential development. When a brownfield	The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5:Location of Development takes a	CSPRQ021

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	<p>site/PDL site is used (first) then any nearby land marked for development in the greenbelt gets removed. (of similar sizes) That way brownfield sites/PDL sites gets used and pressure on the greenbelt is reduced. Incentives could help formulate this.</p>	<p>priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement. Therefore there will be a limited amount of Green Belt land released for development.</p>	
	<p>2o. so can you now stop any further developments on greenfield until all brownfield is built on</p>	<p>The National Planning Policy Framework does not support the use of a sequential approach for the redevelopment of Brownfield land. In order to meet the housing needs of the District there will need to be a limited amount of development on Green Belt land in some settlements. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land. The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy SC5).</p>	<p>CSPRQ020</p>
	<p>2p. Why should any green belt land be used before all brownfield sites have been full utilised?</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient</p>	<p>CSPRQ061</p>

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		<p>deliverable and developable Brownfield land to meet the District's full housing and employment requirement. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	
	<p>2q. Make sure you follow before encroaching on greenbelt land - set up working parties and be very transparent in your findings - do not waste public money as litigation will follow if you have not been thorough</p>	<p>In order to meet the housing needs of the District there will need to be a limited amount of development on Green Belt land in some settlements. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land. The Core Strategy supports and encourages the redevelopment of Brownfield sites (Policy SC5).</p>	<p>CSPRQ006</p>
	<p>2r. We welcome the proposed approach to review and update the evidence base to determine whether there are exceptional circumstances to justify release of land</p>	<p>Comments noted.</p>	<p>CSPRQ029</p>

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	from the Green Belt.		
	2s. Leave the green bely alone. When it is gone, it is gone forever. Build in the cess pit that is Bradford.	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land.</p> <p>However, the Council has therefore concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	CSPRQ038
	3. Scale of Green Belt Release		
	3a. It is expected that a considerable scale of Green Belt release will remain essential, if the Council is to have any prospect of meeting its minimum housing	The Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in the District. This position is primarily underpinned by evidence work on	CSPR001 CSPR003

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	<p>requirements.</p> <p>Whilst the overall annual housing requirement is likely to be reduced, there is still a requirement to release Green Belt land to accommodate all of the development of the District.</p>	<p>housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. However, the scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p>	
	<p>3b. The strategy for allowing changes for larger, strategic sites is sensible. But smaller sites, or pockets of development within the GB should be assessed separately. Say under 5ha. GB boundaries often wash over large swathes of land and over time those land uses or the development within sites has progressed. Often, many sites do not contribute to the GB and it would be common sense to take them out and slightly amend boundaries.</p>	<p>The Council is carrying out a selective review of the Green Belt as part of the C SPR and Allocations DPD. This will consider the performance of each parcel of Green Belt land against the purposes of including land within the Green Belt. This will help identify the potential areas of land which could allow for some limited Green Belt release to help meet the housing and employment needs of the District. Further consideration will be given to the detailed Green Belt boundaries in the Allocations DPD.</p>	<p>CSPRQ011</p>
	<p>4. Exceptional Circumstances</p>		
	<p>4a. Support the Council's decision to identify any exceptional circumstances for the release of Green Belt land.</p> <p>Consider that it is likely that Green Belt amendments will still be required and are confident that the exceptional circumstances as identified in the Core Strategy remain to justify the use of Green Belt land.</p>	<p>Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This includes:</p> <ul style="list-style-type: none"> - making as much use as possible of suitable brownfield sites and underutilised land; 	<p>CSPR002 CSPR005 CSPR006 CSPR007 CSPR008 CSPR009</p>

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		<ul style="list-style-type: none"> - optimising the density of development including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and - discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. <p>This is now national planning policy under para 137 of the NPPF.</p>	<p>CSPR010 CSPR011 CSPR012 CSPR013</p>
	<p>4b. The current Policy SC7 makes no reference to the utilisation of brownfield land within the Green Belt. When considering the exceptional circumstances for the possible release of Green Belt land the previous use of the site should be a factor that is considered.</p>	<p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF. This includes giving first consideration to land which has been previously developed and/or is well-served by public transport.</p>	<p>CSPRQ107</p>
	<p>4c. Totally agree with the green belt issues. Exceptional circumstances are now referred to as very special circumstance. There's a need to clearly define what 'Exceptional circumstances,' in fact are. The definition has changed at each R&A meeting attended. Here we see that it's a combination of long term</p>	<p>Exceptional circumstances relate to changes made to the Green Belt at the plan-making stage. Very Special Circumstances relates to development in the Green Belt at the planning application stage.</p> <p>Before concluding that exceptional circumstances</p>	<p>CSPRQ036</p>

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	<p>housing and jobs growth in the district. Having already established that employment growth to 2030 is 1,600, why is there a requirement for 42,100 homes in the same period? Development density is standardised at 30 units per hectare, however, this figure isn't universally applied and it needs to be.</p>	<p>exist to justify changes to Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This includes:</p> <ul style="list-style-type: none"> - making as much use as possible of suitable brownfield sites and underutilised land; - optimising the density of development including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and - discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. <p>This is now national planning policy under para 137 of the NPPF.</p> <p>In Bradford District these options have been explored and the Council is satisfied that exceptional circumstances can still be justified for the release of some Green Belt. Although the housing and employment requirements have changed there is still a need for some Green Belt development albeit less than in the adopted Core Strategy.</p>	

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		<p>There is no national density standard set out in the NPPF. Indeed, para 137 indicates that higher densities should be considered in city and town centres and areas well served by public transport.</p>	
	<p>4d. The reduction in the annual housing requirement to 1,650 per year and the potential for higher levels of household spaces to be created by conversion/change of use (550/year) means that the need to build on Green Belt can be greatly reduced and should be minimised. It is highly unlikely that exceptional circumstances now exist that require building on the Green Belt in the period up to 2035 and especially in the shorter term. As previously mentioned the target of 1,650/year is well above the latest evidence from ONS and therefore no uplift in the 1,650 requirement is desirable or necessary. Nor would a higher figure meet the 'exceptional circumstance' criteria.</p>	<p>The Core Strategy Partial Review sets out a lower housing requirement figure for the District than that in the adopted plan. Initial assessment work to determine whether there are sufficient sites within existing settlement boundaries to meet this new requirement suggests that there will still need to be some Green Belt release in some settlements.</p> <p>The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy.</p>	<p>CSPRQ051</p>

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	<p>4e. I agree and the exceptional circumstance should only be allocated when all the PDL has been built upon not just permission granted</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land.</p> <p>However, the Council has therefore concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	<p>CSPRQ039</p>
	<p>4f. Sickening & disheartening to read. Existing Green belt land should stay just that. It should not be bought through the persuasion there are exceptional circumstances.</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring</p>	<p>CSPRQ105</p>

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		<p>authorities. The National Planning Policy Framework allows for the release of Green Belt in exceptional circumstances</p> <p>The Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	
	<p>4g. As part of the CSPR, the Council are re-assessing the case for exceptional circumstances and identifying the need for any changes to Green Belt boundaries through a Green Belt review.</p> <p>Paragraph 136 of the NPPF states "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period".</p> <p>Paragraph 137 of the NPPF states <i>"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic</i></p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land (it is acknowledged that the allocation of Brownfield land will need to be supported by evidence of delivery) and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	<p>CSPR018</p>

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	<p><i>policies, which will take into account the preceding paragraph, and whether the strategy:</i> <i>a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.</i></p> <p>It is important that the development strategy is not overly reliant on brownfield sites. Bradford Council have been unable to demonstrate a five-year housing land supply for several years and therefore it is important that deliverable sites are available to ensure that a five-year housing land supply can be maintained.</p> <p>From our recent experience of working with neighbouring authorities, it is considered unlikely that they would be able to accommodate any of the identified need for development in the Bradford district. Paragraph 138 of the NPPF states “<i>When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development</i></p>	<p>The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>Should Menston require Green Belt release the specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD, taking account of the need to pursue sustainable patterns of development.</p>	

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	<p><i>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. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport”.</i></p> <p>The need to promote sustainable patterns of development is important, particularly in districts with a significant proportion of Green Belt, such as Bradford. It is considered that Menston provides the opportunity to release Green Belt land for development which is well-served by public transport in accordance with the NPPF. Menston has excellent public transport accessibility by train and bus services as set out above at paragraph 2.27.</p> <p>Whilst land outside of the Menston settlement boundary currently lies within the Green Belt we consider that there is capacity for further housing to be accommodated on sustainable sites. The SHLAA identifies that there are few physical constraints for sites in Menston, with local policy constraints cited generally as the main inhibiting factor such as the Green Belt designation.</p>		
	<p>4h. Policy SC7 of the adopted Core Strategy (which was adopted relatively recently) concludes that exceptional circumstances exist to amend Green Belt boundaries in order to accommodate the District's</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising</p>	<p>CSPR021</p>

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	<p>housing and employment land requirements. In particular it states in the supporting text to Policy SC7 at Paragraph 3.102 that: <i>“the Council considers, having reviewed the evidence and all reasonable alternatives, that exceptional circumstances exist which justify and require a change to the Green Belt in order to meet its development needs for housing in full and in order to support long term economic success of the District. It is clear based on the land supply in the SHLAA that in order to meet the Housing Requirement under Policy HO1 in full would necessitate change to Green Belt to accommodate around 11,000 dwellings, given land supply constraints in non Green Belt land. This is supported by evidence in the Growth Study that land is available in the Green Belt in sustainable locations which would also not prejudice the strategic function of Green Belt.”</i></p> <p>This matter has been the subject of close scrutiny by both the Core Strategy Inspector and subsequently the Secretary of State in considering this matter during the period of the temporary holding direction that was placed on the Core Strategy. All agreed that exceptional circumstances exist, hence the subsequent adoption of the plan.</p> <p>In the context of the decision having been taken to carry out the Partial Review, it acknowledged that it is appropriate to reflect further on this matter again. In particular, it will be necessary to consider the matter against the requirements of paragraph 137 of the</p>	<p>the reuse of previously developed land (it is acknowledged that the allocation of Brownfield land will need to be supported by evidence of delivery) and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p>	

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	<p>revised NPPF which states: <i>Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:</i></p> <ul style="list-style-type: none"> <i>a) makes as much use as possible of suitable brownfield sites and underutilised land;</i> <i>b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and</i> <i>c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.</i> <p>Such tests do not diverge in any significant way from those relevant exceptional circumstances assessed and established as part of the examination of the adopted Core Strategy. Whilst it will be necessary to consider such matters in detail once the review of the overall housing requirement (Policy H01) is concluded and an updated position on housing land supply is</p>		

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	<p>finalised, it is considered that exceptional circumstances continue to exist to require a considerable release of land from the Green Belt to meet the economic growth and housing needs of the District. This is based on the following:</p> <p>1 To ensure that the level of future housing growth is aligned with the District's Economic Strategy, the evidence we have presented in respect of the review of Policy H01 (Section 3 above) concludes that any revised housing requirement needs to be at a similar level to that set out in the adopted Core Strategy.</p> <p>2 Based on the conclusions of the most recently published SHLAA (2nd update – July 2015) there is insufficient land identified on sites outside of the Green Belt to accommodate the overall housing requirement, or indeed the revised figure that we advocate. Whilst we are aware that an updated SHLAA is expected later this year, we would not expect it to come to a markedly different conclusion on supply. Indeed, it is noted that the recent 'Interim Housing Land Supply Update' published by the Council in December 2018 concludes at paragraph 6.6 that "whilst the SHLAA identifies sufficient land to meet the District's housing requirement, but in some settlements there would be tough choices on the future allocations which would mean significant Green Belt releases and the assessment of supply to date confirms that these challenges remain".</p> <p>3 The Council has fully explored opportunities to maximise delivery within Bradford City Centre through</p>		

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	<p>the adopted City Centre Area Action Plan. 4 We are not aware of any discussions taking place at a sub-regional level for any other District to accommodate part of Bradford's housing requirement. Indeed, all neighbouring authorities (Leeds, Calderdale, Kirklees, Harrogate and Craven) are at advanced stages of plan preparation and do not include accommodate additional housing sites to accommodate such need. CEG wish to reserve the right to revisit such matters and comment in more detail in due course once the updated land supply position and any wider evidence base is published.</p>		
	<p>4i. I agree with (a)(c) The Green Belt should be sacrosanct. The Green Belt is there as a demarcation line between settlements and is required by humans for their well being. Once the Green Belt is concreted over, then it is lost to all future generations. Developers should not be making a case for exceptional circumstances to be taken into consideration, and then if they are disallowed, to appeal or sue the council.</p>	<p>The Council has to prepare the Local Plan in line with National Planning Policy. It has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method</p>	<p>CSPRQ109</p>

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		to set a new lower minimum housing need figure.	
	<p>4j. The NPPF at paragraph 136 is that Green Belts can be altered through the plan process if exceptional circumstances exist. BMDC is a Green Belt authority and it is clear that alternative approaches cannot meet the need for housing. It is therefore essential that BMDC maintain the need for a Green Belt release and with it enable the delivery of an effective plan. BMDC is a constrained authority. The total percentage of area designated as Green Belt land within Bradford Local Planning Authority is 65%. This means that a significant proportion of land coverage is made up of Green Belt land. That beyond is either PDL or protected areas such as Ilkley Moor SPA making for a challenging environment in which to direct development.</p> <p>In reviewing PDL sites there is a danger that an over reliance on potentially constrained, contaminated or unviable sites would result in the authority failing to identify sufficient 'deliverable and developable' land for development. This would cause conflict with the approach to delivering a flexible supply of housing land and need to fully meet its LHN and paragraph 67 of the NPPF.</p> <p>To detail, building at density on PDL sites is only viable insofar as certain capital values can be reached, otherwise developers will not build. This is due to certain economic realities and cash flow positions which result in greater challenges when compared with</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land (it is acknowledged that the allocation of Brownfield land will need to be supported by evidence of delivery) and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement.</p> <p>The Council has therefore concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>The Council is continuing to support the development of a Sustainable Urban Extension (SUE) at Holme Wood, which is developed further through Sub Area policy BD1. The SUE has</p>	CSPRQ034

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	<p>Green Belt sites. The current average house price in Bradford City is c. £175,000 compared with the national average of c. £320,000 (see figure 1). With Bradford a lower value city when compared nationally it is unlikely to be attractive for large scale city/ district centre investment in historic buildings, such as mills, which represent higher build costs and increased technical difficulties. Caution must be made to focusing development on brownfield land as this could undermine the sustainable development aspirations outlined throughout the NPPF.</p> <p>The final point set out in SC7 in its current format is the ability for neighbouring authorities to help accommodate Bradford's housing need. However neighbouring LPA's are also under pressure to protect their Green Belt boundaries and would be highly unlikely to accommodate any of Bradford's development needs to any significant degree.</p> <p>This means that Bradford as a district only has a small amount of non-Green Belt available land which is not suitable and available to meet housing needs in any effective way. There is therefore a need to carefully select Green Belt land which performs poorly on the 5 purposes of the Green Belt set out at paragraph 134 of the NPPF.</p> <p>The economic aspirations set out in the Bradford Economic Strategy state that growth is a key aim for the local authority and as such where possible development should be concentrated within the district to help attract a greater level of inward migration rather</p>	<p>opportunities to make a significant contribution to meeting the overall housing need for the District and to support regeneration opportunities within the existing nearby Holme Wood Estate as well as providing a range of other uses including employment, and an enhanced range of local facilities and services. There is also the opportunity to unlock major strategic infrastructure investment to improve cycling, walking and public transport options and address existing vehicle congestion in South Bradford.</p> <p>The Council is carrying out a selective review of the Green Belt as part of the CSPR and Allocations DPD. This will consider the performance of each parcel of Green Belt land against the purposes of including land within the Green Belt. This will help identify the potential areas of land which could allow for some limited Green Belt release to help meet the housing and employment needs of the District.</p> <p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF.</p>	

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	<p>than lose development to neighbouring authorities, especially Leeds which already has a higher level of economic investment.</p> <p>Where development requirements cannot be met within the existing boundaries in main urban areas, support should be given to urban extensions, where such an approach would deliver the most sustainable pattern for development. In the case of the South East extension it would also bring comprehensive regeneration and investment in to Holme Wood making it a development that would fulfil the Council's regeneration priorities. In order to enable delivery safeguarded land should be considered. This alongside the sustainable location and given the lack of function that the Green Belt designation has within this area makes it is a solution to help with the growth pressures of the area. Please refer back to the first section of this representation for more detail regarding the five purposes relating to the Holme Wood site.</p> <p>Recommendation 3: A Green Belt Review is maintained to meet BMDC's growth strategy aims and extended to include the identification of safeguarded land. This will allow for sites to be considered where the Green Belt function is weak and that are in a sustainable location with access to transport and amenities. In the interests of effective planning.</p>		
	<p>4k. Whilst our clients view remains that the Council should not revise the housing requirement that was found sound as recently as 2017, if a reduced housing</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise</p>	<p>CSPRQ032</p>

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	<p>figure is progressed, the Council will in our view continue to require a significant amount of land to be released from the Green Belt in order to ensure that their housing requirement can be met.</p> <p>These representations have set out the deliverability issues that the District faces in a number of areas and the Council must direct proposed allocations to areas where there are deliverable and developable sites.</p> <p>The District is made up of a settlement hierarchy with a number of settlements having had little if any development. Development in these areas invariably will include Green Belt towns and villages, however this should not stifle their growth and prejudice their sustainability.</p> <p>The Council previously noted this and it is considered that exceptional circumstances will still remain if the Council do reduce the housing requirement.</p> <p>The appropriate approach to take is to establish a required level of housing and an appropriate distribution based on sustainability and need. Once this is done, the available sites should be considered and if Green belt is required then it should be released. It would be unsound to simply seek to allocate all land to non Green belt sites, as this would prejudice development in areas with a clear need.</p> <p>This approach was found sound in 2017 and there has been no alteration to the tests of soundness or national policy which would change this position.</p>	<p>the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>Policy HO3 sets out the revised housing distribution for the District. This is based on a number factors including a consideration of the quantity of housing that has been delivered, the housing needs, constraints, land supply and deliverability issues, and the sustainability of each settlement. The position each settlement holds within the settlement hierarchy has also been taken into account.</p> <p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138</p>	

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		of the NPPF.	
	<p>4I. Whilst our clients view remains that the Council should not revise the housing requirement that was found sound as recently as 2017, if a reduced housing figure is progressed, the Council will in our view continue to require a significant amount of land to be released from the Green Belt in order to ensure that their housing requirement can be met.</p> <p>These representations have set out the deliverability issues that the District faces in a number of areas and the Council must direct proposed allocations to areas where there are deliverable and developable sites. The District is made up of a settlement hierarchy with a number of settlements having had little if any development. Development in these areas invariably will include Green Belt towns and villages, however this should not stifle their growth and prejudice their sustainability.</p> <p>The Council previously noted this and it is considered that exceptional circumstances will still remain if the Council do reduce the housing requirement. The appropriate approach to take is to establish a required level of housing and an appropriate distribution based on sustainability and need. Once this is done, the available sites should be considered and if Green Belt is required then it should be released. It would be unsound to simply seek to allocate all land to non-Green Belt sites, as this would prejudice development in areas with a clear need.</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>Policy HO3 sets out the revised housing distribution for the District. This is based on a number factors including a consideration of the quantity of housing that has been delivered, the housing needs, constraints, land supply and deliverability issues, and the sustainability of each settlement. The position each settlement holds within the settlement hierarchy has also been taken into account.</p>	CSPRQ033

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	<p>4m. This approach was found sound in 2017 and there has been no alteration to the tests of soundness or national policy which would change this position</p>	<p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF.</p>	
	<p>4n. Whilst our clients view remains that the Council should not revise the housing requirement that was found sound as recently as 2017, if a reduced housing figure is progressed, the Council will in our view continue to require a significant amount of land to be released from the Green Belt in order to ensure that their housing requirement can be met. These representations have set out the deliverability issues that the District faces in a number of areas and the Council must direct proposed allocations to areas where there are deliverable and developable sites. The District is made up of a settlement hierarchy with a number of settlements having had little if any development. Development in these areas invariably will include Green Belt towns and villages, however this should not stifle their growth and prejudice their sustainability. The Council previously noted this and it is considered that exceptional circumstances will still remain if the Council do reduce the housing requirement. The appropriate approach to take is to establish a required level of housing and an appropriate distribution based on sustainability and need. Once this is done, the</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>Policy HO3 sets out the revised housing distribution for the District. This is based on a number factors including a consideration of the</p>	<p>CSPR037</p>

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	<p>available sites should be considered and if Green Belt is required then it should be released. It would be unsound to simply seek to allocate all land to non Green Belt sites, as this would prejudice development in areas with a clear need.</p> <p>This approach was found sound in 2017 and there has been no alteration to the tests of soundness or national policy which would change this position.</p>	<p>quantity of housing that has been delivered, the housing needs, constraints, land supply and deliverability issues, and the sustainability of each settlement. The position each settlement holds within the settlement hierarchy has also been taken into account.</p> <p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF.</p>	
	<p>4o. The council has no need to build on green belt as it has sufficient other options and is not maximising all current available options. Leeds have recently agreed not to build on greenbelt and Bradford should do the same. There are NO legitimate exceptional circumstances in Bradford.</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land.</p> <p>However, the Council has therefore concluded that exceptional circumstances exist to justify the</p>	<p>CSPRQ037</p>

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		limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.	
	<p>4p. The National Trust agrees that the Council needs to demonstrate that they have looked at all other reasonable options for meeting development needs before concluding that exceptional circumstances exist which allow for land to be taken out of the Green Belt. We agree that the following steps should be followed before concluding that exceptional circumstances exist to allow change to Green Belt boundaries; making as much use as possible of suitable brownfield sites and underutilised land; optimise the density of development; and have discussions with neighbouring authorities to determine whether they could accommodate any of the development needs that cannot be met within the District.</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p>	CSPR042
	5. Meeting needs sustainably		
	5a. This means that Bradford as a district only has a small amount of non-Green Belt available land which	The Bradford District has a significant mixed portfolio of brownfield sites and in line with	CSPR015

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	<p>is not suitable and available to meet housing needs in any effective way. There is therefore a need to carefully select Green Belt land which performs poorly on the 5 purposes of the Green Belt set out at paragraph 134 of the NPPF with reference to the least constrained areas.</p>	<p>national Government policy and guidance, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.</p>	
	<p>5b. The requirement to demonstrate that the Council has looked at all the other reasonable options for meeting their development needs does not come at the expense of not meeting those needs in a sustainable manner. It is plain that there are ample sites in sustainable locations which would not put at risk the 5 purposes for including land within the Green Belt and these should be considered before less sustainable options of options which do not meet the strategic policies of the plan.</p>	<p>The Council's strategy continues to support sustainable development, linked to its established settlement hierarchy.</p>	<p>CSPR003</p>
	<p>5c. The Scoping Report refers to a 'selective review of Green Belt land around the sustainable growth locations identified in the Core Strategy'. It is unclear whether this refers to the adopted Core Strategy or the emerging one. It is unclear how the relative sustainability of the growth locations is established. We would therefore wish to see a clear sustainability case presented for each 'sustainable growth location' and a strategic framework for how this will be implemented. Our crucial concern here is that any Green Belt change must be justified not just on the basis of its</p>	<p>The Green Belt selective review will look at those settlements identified within the settlement hierarchy of the adopted Core Strategy. The Green Belt review methodology indicates that parcels of Green Belt land will be drawn around every settlement inset into the Green Belt. Those parcels not touching an inset settlement have been excluded from the review (further details are provided in the methodology at paras 3.14 and 3.15). The selective review will assess these parcels against the five purposes of including land within</p>	<p>CSPRQ024</p>

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	<p>impact on the Green Belt, but its transformative potential for sustainability. Therefore the Core Strategy must set out very precise expectations for the type of development that would result from land coming out of the Green Belt for allocation.</p> <p>In terms of impact on Green Belt function itself, it remains our view that the principal risks are:</p> <ul style="list-style-type: none"> • the pinch-point between Tong and Pudsey, which is also subject to allocation pressures with the Leeds Site Allocations Plan and is a precious countryside asset within the West Yorkshire conurbation; • the already partial coalescence of Buttershaw with Shelf and Northowram (Calderdale), creating a high risk of a continuous built-up area between Bradford and Halifax; • the very narrow pinch-point between Wyke and Bailliff Bridge creating a continuous built-up area between Bradford and Brighouse (Calderdale); • the already partial coalescence of Wyke and Scholes (Kirklees), exacerbated by employment allocations around M62 J26 in Kirklees. <p>In Wharfedale, there may or may not be risks of coalescence depending on the specific sites that might be proposed to be taken from the Green Belt, with the key pinch-points being between Guiseley (Leeds), Menston and Burley-in-Wharfedale.</p> <p>However, the much wider question arising from potential Green Belt deletions in both the Wharfe and Aire Valleys is, 'What would a Green Belt change enable?' In our view, simply enabling a housing</p>	<p>the Green Belt. The methodology has developed a set of local criteria in order to assess these purposes. The review will identify those areas of land which perform strongly/weakly against the purposes. This in turn will be used when identifying the most appropriate areas for Green Belt release.</p> <p>The Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>The Sub Area policies provide the strategic policy direction on key changes to the Green Belt and where these will occur. The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF.</p>	

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	<p>development, especially in high demand settlements where values are very high, would be hugely unsustainable. It would certainly lead to increased traffic congestion, worsening air quality and pressure on other services. It is also likely that it would serve more to fuel demand for high-value open market housing than to meet identified needs. In our view, if the results of a Green Belt change would be so risky from a sustainability perspective, then the exceptional circumstances for Green Belt change cannot be justified.</p>		
	<p>5d. In the Pennine villages areas therefore some Green Belt release if the 5 purposes of Green Belt set out in NPPF are performing weakly and the location is highly sustainable should be considered for boundary amendments. Table 3 and Table 14 are therefore interlinked. We have previously responded to the Green Belt consultation 2018 in this regard.</p>	<p>Comments noted.</p> <p>The Green Belt review will be used to identify those areas which perform weakly against the five purposes of including land within the Green Belt. This will then be used as part of the site assessment process to identify locations where Green Belt release may be appropriate. Revised Policy HO3 sets out the housing distribution and Policy SC7 establishes the exception circumstances for Green Belt release. These policy demonstrate that the scale of Green Belt release across the district is substantially less than that set out in the adopted Core Strategy, with only a few of the South Pennine towns and villages seeing any Green Belt release. When releasing sites from the Green Belt consideration will need to be given to pursuing sustainable development as required by para 138 of the</p>	<p>CSPR016</p>

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		NPPF.	
	6. Green Belt Review		
	6a. A Green Belt Review is maintained to meet BMDC's growth strategy aims and extended to include the identification of safeguarded land. This will allow for sites to be considered where the Green Belt function is weak and that are in a sustainable location with access to transport and amenities. In the interests of effective planning.	<p>The Council is carrying out a selective review of the Green Belt as part of the CSPR and Allocations DPD. This will consider the performance of each parcel of Green Belt land against the purposes of including land within the Green Belt. This will help identify the potential areas of land which could allow for some limited Green Belt release to help meet the housing and employment needs of the District. Further consideration will be given to the detailed Green Belt boundaries in the Allocations DPD.</p> <p>Revised Policy SC7 acknowledges the need to identify safeguarded land to meet longer term development needs. Such sites will also be identified in the Allocations DPD.</p>	CSPR015
	6b. Green Belt reviews must also take account of current recreational and tourism assets; e.g. recreational paths such as Pennine Way, Dales Way, Worth Way, and international visitors to the Worth Valley and Thornton because of the Bronte sisters. The tourists provide valuable income to the district.	The Green Belt review can only look at how land designated as Green Belt performs against the five purposes for including land in the Green Belt as set out in paragraph 134 of the NPPF.	CSPRQ078
	6c. We also support the Council's intention to conduct a Green Belt review as this will greatly assist in understanding the local capacity to meet housing	The Council is carrying out a selective review of the Green Belt as part of the CSPR and Allocations DPD. This will consider the	CSPR041

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	<p>needs. The potential to remove land from the Green Belt should be clearly considered in the context of paragraph 136 of the NPPF, which retains the emphasis on evidencing exceptional circumstances to support alterations to its boundaries. The need for housing, and the economic and social benefits that the delivery of affordable housing brings over the long term to an area, should not be underestimated in reviewing the Green Belt within the context of Policy HO3.</p>	<p>performance of each parcel of Green Belt land against the purposes of including land within the Green Belt. This will help identify the potential areas of land which could allow for some limited Green Belt release to help meet the housing and employment needs of the District.</p> <p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	
	<p>6d. I agree that the green belt land should be preserved if at all possible, and I would question whether any green belt land should ever need to be released for development. I believe Councils could, if they tried hard enough, always find a viable alternative that ensured the preservation of the green belt. The</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations</p>	<p>CSPRQ116</p>

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	<p>are so many inner-city and inner-town areas screaming out to be regenerated. I also suggest that there are areas which have not been classified as green belt which probably should be, and I would encourage an evidence-based review of the green belt boundaries.</p>	<p>as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>Similarly to releasing land from the Green Belt, the Council would need to demonstrate that exceptional circumstances exist for including land within the Green Belt.</p>	
	<p>6e. A comprehensive review of previously developed sites within the greenbelt also needs to be undertaken in light of current NPPF policy so it can be determined whether separate policy provision should be made for these in the Core Strategy, for many of these sites were ignored in previous SHLAA's</p>	<p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF. This includes giving first consideration to land which has been previously developed and/or is well-served by public transport.</p>	<p>CSPRQ113</p>
	<p>7. Use of Brownfield sites</p>		
	<p>7a. It also needs to be considered that most brownfield sites which exist in the District are likely to be located in areas which have viability issues and therefore</p>	<p>Each brownfield site will have its distinct characteristics, constraints and viability profile. Site constraints have been considered in setting</p>	<p>CSPR003</p>

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	housing delivery is likely to be lower than that which could be theoretically delivered.	the Core Strategy minimum housing targets and distribution of growth.	
	7b. In reviewing PDL sites there is a danger that an over reliance on potentially constrained, contaminated or unviable sites would result in the authority failing to identify sufficient 'deliverable and developable' land for development. This would cause conflict with the approach to delivering a flexible supply of housing land and need to fully meet its LHN and paragraph 67 of the NPPF. To detail, building at density on PDL sites is only viable insofar as certain capital values can be reached, otherwise developers will not build. This is due to certain economic realities and cash flow positions which result in greater challenges when compared with Green Belt sites. The current average house price in Bradford City is c. £175,000 compared with the national average of c. £320,000.	Each site to be allocated with the Site Allocations DPD will be subject to detailed site assessments and a review of delivery and viability. Bradford does have a history of housing delivery on PDL with some developers able to delivery good quality housing across the District. Local and regional developers also understand the Bradford market and respond in a proactive way to what would be perceived as significant site challenges by other developers.	CSPR015
	7c. The Green Belt is of immense importance to everyone. There can be no justification to build on Green Belt whilst Brownfield and PDL sites are available.	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas</p>	CSPRQ030

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		of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.	
	7d. With Bradford a lower value city when compared nationally it is unlikely to be attractive for large scale city/ district centre investment in historic buildings, such as mills, which represent higher build costs and increased technical difficulties. Caution must be made to focusing development on brownfield land as this could undermine the sustainable development aspirations outlined throughout the NPPF.	This is a simplistic analysis and Bradford City and outer areas has benefited from high quality mill conversions. The values across the city and district also vary considerably and are not necessary static – particularly when considering planning over at least a 15-year horizon.	CSPR015
	7e. No Green belt or further greenfield development should be considered until ALL Brownfield/PDL sites have been exhausted. We have situations where a greenfield is being developed yet virtually alongside a derelict PDL site is left untended and neglected.	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need,</p>	CSPRQ108

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		<p>which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>The NPPF does not make provision for a sequential approach to the development of Brownfield land and therefore the Council cannot require such sites to be developed before Greenfield sites. The Council does support and encourage the use of PDL land as a first priority (Policy SC5).</p>	
	<p>7f. Why have green field sites been developed in the past and continue to be planned in Silsden when brown field sites are still available?</p>	<p>Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, the National Planning Policy Framework does not restrict development on Greenfield land.</p>	<p>CSPRQ053</p>
	<p>7g. Greenbelt should not be built on anywhere before a brownfield site, the district council should ensure that all brownfield sites in Central Bradford should be built on before looking any brownfield sites, especially in rural locations like Haworth, Cross Roads and Stanbury</p>	<p>Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority.</p> <p>However, the Council has to ensure that it meets the housing needs of all areas of the District, and the housing requirement is therefore distributed accordingly, including to settlements such as Haworth.</p> <p>The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land. However,</p>	<p>CSPRQ054</p>

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		it has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.	
	7h. Prioritising the use of PDL , brownfield sites should be the route to pursue to meet housing and employment requirements. It allows for more affordable and better located housing. Using up all the more valuable urban green space is destroying quality of life for the benefit of developers who are overcharging for properties which don't meet the housing needs of the population. Causing over congestion, shortage of resources including schools and GP's, and negatively impacting nature and the environment in desirable suburbs/areas.	The Council has to identify sufficient land to meet the housing and employment needs of the district.	CSPRQ102
	7i. As set out previously, Keepmoat Homes consider that the re-use of previously developed land plays an important role in the identification of suitable housing sites in the District. Keepmoat Homes are experienced in developing previously developed land but suggests that a flexible approach should be taken given the high percentage of Green Belt land within the District. This will ensure that the Council can provide the quantum of deliverable and developable housing sites required to meet the needs of the population.	The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF. However, the Council has concluded that	CSPR044

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	7j. Keepmoat Homes would therefore support a Green Belt review in order to meet the District's growth aspirations and ensure a supply of sustainable and deliverable housing sites can be identified.	<p>exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. This work will be informed by the selective Green Belt review which is currently being carried out by consultants on behalf of the Council. This review will assess parcels of Green Belt land and determine their continued performance against the five purposes of including land within the Green Belt.</p>	
	8. Urban Extensions		
	8a. The economic aspirations set out in the Bradford Economic Strategy state that growth is a key aim for the local authority and as such where possible development should be concentrated within the district to help attract a greater level of inward migration rather than lose development to neighbouring authorities, especially Leeds which already has a higher level of economic investment. Where development requirements cannot be met within the existing boundaries in main urban areas, support should be given to urban extensions, where such an approach	<p>Comments noted regarding the economic aspirations and the Council has concluded that exceptional circumstances exist to allow for a limited release of Green Belt land. However, this release will take place in fewer settlements than set out in the adopted Core Strategy.</p> <p>Policy HO3 sets out the revised housing distribution for the District. This is based on a number factors including a consideration of the quantity of housing that has been delivered, the</p>	CSPR015

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	<p>would deliver the most sustainable pattern for development and where the Green Belt's function is at its weakest. With the approval of the land to the west it is clear that the site at Apperley Bridge performs such a function.</p>	<p>housing needs, constraints, land supply and deliverability issues, and the sustainability of each settlement. The position each settlement holds within the settlement hierarchy has also been taken into account.</p> <p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF.</p>	
	<p>8b. Its vital that IF green belt sites are to come forward which they must then the best sites are selected and no PREMATURE proposals are allowed to jump the gun. Clear extensions into the green belt, narrowing the gap between settlements and offending all other purposes of the green belt etc should be should be avoided and a consistent and considered view of all sites should be undertaken PRIOR to any decisions being made. Where there are "better" sites that could help fill the 5 year supply, which is currently absent, they should be prioritised.</p>	<p>The Allocations DPD will carry out a systemic approach to assessing sites for new development and any Green Belt sites will be assessed against the purposes of including land within the Green Belt. The NPPF (para 138) indicates that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.</p> <p>Where Green Belt sites are proposed ahead of the Allocations DPD, such proposal will have to justify the Very Special Circumstances as required by NPPF para 143.</p>	<p>CSPRQ016</p>
	<p>8c. Why is the council not treating this space as an asset? Why is it not looking at it as an economic benefit? 2. Should we make an assessment of the value of the</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising</p>	<p>CSPR039</p>

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	<p>green belt to inhabitants and to businesses located in these areas? Riding schools, farm shops and garden centres are enhanced by their location in the Tong Valley green belt.</p> <p>3. Why is the Green belt in South-east Bradford not viewed as an opportunity to enhance well-being for the population of Bradford rather than as a space for building?</p>	<p>the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>With a positive long term plan in place to support growth through the limited release of Green Belt land there are clear opportunities for the Council to plan positively to enhance the redefined Green Belt in terms of improving damaged land, access, leisure, visual amenity, landscape and bio-diversity and support appropriate levels of green and other infrastructure within the proposed allocated sites.</p>	
	<p>8d. We agree with what is said in this introduction, but it does not match the reality of what the Council has actually done in relation to its Green Belt Review Methodolgy in respect of the proposed Holme Wood Urban Extension (the "HWUE").</p> <p>In respect of the HWUE the Council excluded this site from the objective tests applicable within the</p>	<p>The Green Belt has to be conducted in line with National Planning Policy. This means that it can only consider the land designated as Green Belt against the five purposes of including land in the Green Belt as set out in the NPPF. Factors such as the recreational and leisure value of land are not identified as reasons for designating land as</p>	<p>CSPRQ114</p>

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	<p>methodology to the rest of the Green Belt. The Core Strategy has so far been framed upon an assumption that the HWUE is a prime part of the housing strategy for the District and that all other policies have been adapted to accommodate that project, including the assumption that "exceptional circumstances" apply to justify a Green Belt release at this point.</p> <p>We fear therefore that the Council will conduct the Partial Review upon the same basis and from the same starting point. We therefore emphasise that the Partial Review should be objective and should not be conducted with any prior commitment to the HWUE.</p> <p>The value of the Green Belt as a recreational and leisure resource should be a factor borne in mind when considering Green Belt release, both generally, and specifically in SE Bradford where its loss would remove a facility not readily otherwise available to residents of that sector of Bradford. Once lost, Green Belt cannot be recovered, and the provision of managed or unmanaged open space within an urban construct is not a substitute for real countryside with real flora and real fauna, real fields, real woodlands and a real rural economy dependant on its preservation.</p>	<p>Green Belt.</p>	

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	9. Adjoining Local Authorities accommodating needs		
Policy SC7	9a. The final point set out in SC7 in its current format is the ability for neighbouring authorities to help accommodate Bradford's housing need. However neighbouring LPA's are also under pressure to protect their Green Belt boundaries and would be highly unlikely to accommodate any of Bradford's development needs to any significant degree.	Noted.	CSPR015
	10. General Green Belt Comments		
	10a. That does not sound bad. It could be improved if it were predicated on a basic position of no building on green belt, and extension of protected green areas, villages, etc in order to protect coherent communities which work well because they are based on mutual trust and commonality. The danger here is that people with no skin in the game will ride rough shod over "ordinary" people's homes and communities. Once planning permission is given by the politicians and bureaucrats, they move on; boxes have been ticked. They do not live with the consequences.	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially</p>	CSPRQ014

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		lower than that in the adopted Core Strategy and fewer settlements will see the release of Green Belt sites.	
	<p>10b. Green belt should not be taken. The council should review, be transparent about, and get community support for any cases of 'exceptional circumstances' that would allow green belt to be taken. What's happened in Burley in Wharfedale over the proposed SunLane development is a good demonstration of how NOT to go about it. The community do not support it, the apparently approved neighbourhood development plan is flawed because of how CIL allocation operates; the parish council conclude that Bradford will take every penny it can get and spend it elsewhere in Bradford so went into damage limitation mode by pushing the community to approve the NDP. I don't live in Burley, the fact that I know about it is an indicator of how controversial it has become and how much anger has been stirred up by Bradford Councils approach.</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>The contribution parish council's get from CIL is set by the government.</p>	CSPRQ041

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		<p>The site at Sun Lane in Burley has come forward ahead of the site allocation process. This application has had to justify the very special circumstances for allowing development in the Green Belt. The outcome of the recent public inquiry has not yet been made.</p>	
	<p>10c. Existing major urban green spaces must be protected and defended.</p>	<p>Policy EN1 of the Core Strategy (Protection and improvement in provision of Open Space and Recreation Facilities) seeks to protect identified areas of open space.</p>	<p>CSPRQ052</p>
	<p>10d. I feel green belt should never be developed it is damaging to our area and something we should protect for future generations</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily</p>	<p>CSPRQ055</p>

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		underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.	
	10d. Good theory but needs to be backed up with robust enforcement of principles.	Comments noted.	CSPRQ056
	10e. Myrtle Grove House has 2.5 acre of brown field land and is right next to worstead road planned development. Myrtle grove House possible could been turned into flats the old billiard room could be turned into 4 to 5 bedroom semi detached house and the land could be developed on.	Comments noted. The site should be submitted to the call for sites for consideration as part of the assessment of sites for the Allocations DPD.	CSPRQ057
	10f. Agree with a) totally not sure about b) c) sounds like a good idea. Are there not times when Authorities and Councils need to say "no"?	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the</p>	CSPRQ058

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		limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.	
	10g. agreed. sites that do not meet the criteria set by green belt policy should be released. whilst still protecting wider greenbelt policies such as urban sprawl	The Council is carrying out a selective review of the Green Belt as part of the CSPR and Allocations DPD. This will consider the performance of each parcel of Green Belt land against the purposes of including land within the Green Belt. This will help identify the potential areas of land which could allow for some limited Green Belt release to help meet the housing and employment needs of the District. Further consideration will be given to the detailed Green Belt boundaries in the Allocations DPD.	CSPRQ060
	10h. Again a statement rather than a conclusion, so is difficult to comment against. Given the historic delivery rates in Bradford, it suggest that Green Belt release is required, and therefore a Green Belt Review should be undertaken to assess the suitability of the Green Belt to accommodate this need.	The Council is carrying out a selective review of the Green Belt as part of the CSPR and Allocations DPD. This will consider the performance of each parcel of Green Belt land against the purposes of including land within the Green Belt. This will help identify the potential areas of land which could allow for some limited Green Belt release to help meet the housing and employment needs of the District. Further consideration will be given to the detailed Green Belt boundaries in the Allocations DPD.	CSPRQ062

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	<p>10i. The value of green belt land should not be underestimated. If the continued use of green belt for development continues it will start to have a detrimental impact on the feel and desirability of areas such as Haworth</p>	<p>Policy SC5: Location of Development takes a priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority.</p> <p>However, the Council has to ensure that it meets the housing needs of all areas of the District, and the housing requirement is therefore distributed accordingly, including to settlements such as Haworth.</p> <p>The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land. However, it has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	<p>CSPRQ065</p>
	<p>10j. Did the Green Belt Review ever get published? What happened to all the submissions that were sent in? What's the point of "consulting" if the Council doesn't publish the contributions and takes no notice anyway? There is no justifiable reason, and no exceptional circumstances, for confiscating Green Belt around Menston and Burley and Addingham for housing when it's only needed if Bradford's Council keeps on pushing people OUT of Bradford's central</p>	<p>The scope of the Green Belt selective review has changed since the original methodology was published. Consultants have now been appointed to take this work forward. The methodology has been substantially rewritten but has taken into account the representation received to the previous consultation. Further opportunity to comment on the Green Belt review methodology will be made at the CSPR preferred options</p>	<p>CSPRQ067</p>

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	<p>areas into the suburbs. And for what reason? Because developers think they'll get better returns by building on Green Belt and thereby obliging people to commute to where there's work. Why is Bradford Council being complicit in this? Will people appreciate and come to visit Wharfedale and The Yorkshire Dales when it's a continuous ribbon of tarmac with houses on either side? Your "Scoping Report" sets out the Government's position and vision, so now that CBMDC has to accept that its original estimate of housing need was massively over-stated, it's time to make a commitment to preserving and protecting the Green Belt which makes our communities special and attractive. That does not necessarily mean there won't be any new housing, but surely it's time to be thinking in terms of the renewal or replacement of older housing stock with more modern, better insulated and higher quality, perhaps denser housing. They do this in other countries like Germany, so isn't it about time we (in Yorkshire) were thinking about demolishing old, unsanitary, damp and outdated properties in areas like Kirkstall, Manningham and Thornton, and building new, smart, energy-efficient housing with facilities to match, and thereby creating new life-chances for residents, without consuming irreplaceable Green Belt?</p>	<p>stage.</p> <p>The Core Strategy Partial Review sets out a lower housing requirement figure for the District than that in the adopted plan. However, the Council has to ensure that it meets the housing needs of all areas of the District, and the housing requirement is therefore distributed accordingly, including to settlements in Wharfedale.</p> <p>Initial assessment work to determine whether there are sufficient sites within existing settlement boundaries to meet this new requirement suggests that there will still need to be some Green Belt release in some settlements.</p> <p>The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at higher densities on sites. However, it has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	
	<p>10k. Our involvement in the concept master planning of all types of site but in particular greenfield sites in areas affected by primary and secondary</p>	<p>The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land. However,</p>	<p>CSPRQ070</p>

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	<p>environmental constraints together with physical and topographical constraints has demonstrated that development site capacity is necessarily restricted in order to create solutions which are acceptable in environmental, sustainable and design terms. The consequence is that a greater amount of land is required to achieve acceptable developments which respect the environment and achieve design quality. Neighbouring authorities in West and North Yorkshire experience the same problems of provision and environmental constraint requiring Green Belt release. Bradford is a very large District which should be capable of providing for its own development needs without impacting on the problems experienced by adjacent districts. There can be little doubt based on all the evidence currently available that due to the future levels of housing and employment need, existing tight Green Belt boundaries and restrictions on the supply, distribution and delivery of brownfield land that exceptional circumstances will exist to fully justify a review of Green Belt boundaries around all settlements in the current hierarchy.</p>	<p>it still needs to ensure that it meets the housing and</p> <p>However, it has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	
	<p>10l. As well as edge of town green belt, we must consider the adequate provision of urban green space within easy reach of residents and which does not require the use of cars to access. Space to exercise and relax is vital in any community and should be available locally, not a car journey away.</p>	<p>Policy EN1 already requires the provision of open space in new developments. The Council are in the process of updating the evidence base on open space provision to highlight those areas which are deficient in open space and to look at opportunities to improve provision in these areas.</p>	<p>CSPRQ072</p>

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	10m. Resist all attempts by Developers to eat into Green belt with large developments	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land.</p> <p>However, the Council has therefore concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>Any release of Green Belt land will come forward through the allocation of sites in the Allocations DPD and will of a scale appropriate to its location.</p>	CSPRQ073
	10n. The present H06 policy of allowing minimal use of Previously Developed Land (under 15%) for Local Growth Centres would appear to conflict directly with this	The percentages in Policy HO6 are based on the proportion of available Brownfield land in each settlement hierarchy area in relation to the overall housing requirement in those areas. i.e. Most of the Local Service Centres have limited amounts of PDL therefore to meet their housing requirements some Greenfield or Green Belt land will need to be developed. Therefore it is not minimal use of PDL.	CSPRQ074
	10o. The NPPF at paragraph 136 is that Green Belts can be altered through the plan process if exceptional circumstances exist. BMDC is a Green Belt authority	The Council has to identify sufficient land to meet the housing and employment needs of the district. Policy SC5: Location of Development takes a	CSPRQ075 CSPRQ076

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	<p>and it is clear that alternative approaches cannot meet the need for housing. It is therefore essential that BMDC maintain the need for a Green Belt release and with it enable the delivery of an effective plan. BMDC is a constrained authority. The total percentage of area designated as Green Belt land within Bradford Local Planning Authority is 65%. This means that a significant proportion of land coverage is made up of Green Belt land. That beyond is either PDL or protected areas such as Ilkley Moor SPA making for a challenging environment in which to direct development. In reviewing PDL sites there is a danger that an over reliance on potentially constrained, contaminated or unviable sites would result in the authority failing to identify sufficient 'deliverable and developable' land for development. This would cause conflict with the approach to delivering a flexible supply of housing land and need to fully meet its LHN and paragraph 67 of the NPPF. The final point set out in SC7 in its current format is the ability for neighbouring authorities to help accommodate Bradford's housing need. However, neighbouring LPA's are also under pressure to protect their Green Belt boundaries and would be highly unlikely to accommodate any of Bradford's development needs to any significant degree. This means that Bradford as a district only has a small amount of non-Green Belt available land which is not suitable and available to meet housing needs in any effective way. There is therefore a need to carefully</p>	<p>priority approach to the use of different types of land. It supports the reuse of previously developed land as the first priority. The Council has explored the relevant options to limit the amount of Green Belt land which will need to be released, including maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities. However, evidence shows that there is insufficient deliverable and developable Brownfield land to meet the District's full housing and employment requirement.</p> <p>The Council has therefore concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p>	

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	select Green Belt land which performs poorly on the 5 purposes of the Green Belt set out at paragraph 134 of the NPPF.		
	10p. Well this is a no-brainer. Of course Bradford Council should commit to a), b) and c). The question is will they seriously do any of it ?	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy.</p>	CSPRQ081
	10q. I do not believe that green belt land should be touched. It has been designated green belt for excellent reasons and those reasons still stand. I'm concerned about the possibility of development on green belt land on Idle Moor NE128. This land is a valued resource to the local community and should remain so.	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring</p>	CSPRQ082

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		<p>authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy.</p>	
	<p>10r. Please include urban green spaces in these standard. They are essential to support communities to breathe and build meaningful communities</p>	<p>Urban green spaces / open space is already protected through Policy EN1. A new open space assessment is currently being prepared and will establish standards for the provision of open space / green space in new developments and the improvement of existing spaces.</p>	<p>CSPRQ083</p>
	<p>10s. The most valuable and desirable land is greenbelt...simply because it's on lovely greenbelt land...great for the land owners and developers Maximum profit around. ...but an absolute abomination for those living close to these lovely open areas</p>	<p>Comments noted.</p>	<p>CSPRQ084</p>
	<p>10t. Green belt has already been sacrificed to effectively join Thackley with Shipley, please do not use any more in Idle/Thackley.</p>	<p>Comments noted.</p>	<p>CSPRQ085</p>
	<p>10u. See before</p>	<p>No comment.</p>	<p>CSPRQ086</p>

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	<p>10v. Sadly I see little consideration being given to protecting green belt land - more and more of it is being eaten away by development making it very difficult to access the remaining green belt, particularly for those without vehicles. The benefits of having easily accessible green space cannot be underestimated; social and health benefits are significant and sadly overlooked too often</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy.</p> <p>Policy EN1 already requires the provision of open space in new development. The Council are preparing an open space assessment to look at the accessibility of open spaces and to put in place standards to help improve access to green space.</p>	<p>CSPRQ087</p>
	<p>10w. Correct - too much development around Apperley Bridge.</p>	<p>Comment noted.</p>	<p>CSPRQ088</p>
	<p>11. General – open spaces</p>		

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	11a. People need open space, open space increases wellbeing, reduces stress and increases work and productivity.	Comment noted. Policy EN1 already aims to protect existing designated open space and requires open space to be provided in new development. The Core Strategy also includes a new policy on public health which recognises the benefits of open space.	CSPRQ089
	11b. There is plenty of open space available for recreation. However improved management of defined trails for pedestrians and cyclists would ensure a generation relying on satellite navigation would not get lost. Defined open areas for wide ranging activities, such as model plane/drone flying can be accommodated with areas for housing.	The Core Strategy requires the provision of open space in new developments (Policy EN1). The Core Strategy also promotes the need for Green Infrastructure across the District (Policy SC6) and this could include define trails etc.	CSPRQ034
	11c. Green belt Land such as Idle Moor should be protected at all costs for use now and in future years. Designated Green belt land is essential in terms of having space for families to exercise, walk their dogs, run, ride their bikes and learn about and see nature and wildlife. At a time when the health of the nation is a massive problem, we are adding to it by losing our green space. It is extremely concerning seeing how much green belt land is being proposed to be built on and also how much land in the idle/thackley area as a whole	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method</p>	CSPRQ090

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		<p>to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>Green Belt land is not necessarily publically accessible. Policy EN1 already aims to protect existing designated open space and requires open space to be provided in new development.</p>	
	<p>11d. The council have built on practically all the green spaces in the area already. We are not going to have any countryside left if the building rate continues.</p>	<p>Approximately 65% of the District's land area is designated as Green Belt.</p> <p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and</p>	<p>CSPRQ091</p>

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		fewer settlements will see Green Belt release.	
	11e. I think the review to the policy is positive and much needed. The district should not be building on green belt and I welcome stricter controls.	Comment noted. The Green Belt policy has been revised and the scale of Green Belt release is substantially lower than that in the adopted Core Strategy.	CSPRQ092
	11f. Please leave some public green space on Idle moor for walking and recreation use	Comments noted.	CSPRQ094
	11g. I would like to object to the proposed site allocation that uses Greenfield land at the side of the Leeds Liverpool canal. I ma talking specifically about site references NE/065, NE/141, NE/069. I believe changing the use of this land to residential development would have a serious impact on wildlife as well as a social impact. Many people use the canal to get a taste of the countryside without the need to hop in a car and travel therefore using this greenspace would be counter productive to the environment causing more pollution and congestion with cars travelling further afield. Please do not give up this precious green space. There are plenty of brownfield sites that can be used to avoid this. Thanks	<p>The opportunity to comment on the proposed site allocations will be provided later in the year when the Preferred Option Allocations DPD is published.</p> <p>Policy SC7 establishes the exceptional circumstances for the release of a limited amount of Green Belt land in order to meet the housing and employment requirements of the District. The Council has taken approach which maximises the use of Brownfield land before considering the need for Green Belt land.</p> <p>The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Consideration will need to be given to pursuing sustainable development as required by para 138 of the NPPF.</p>	CSPRQ096
	11h. Whilst we appreciate and acknowledge the need	The Council has to identify sufficient land to meet	CSPRQ099

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	<p>at both a national and local level to prioritise new development on brownfield land. It is clear that for Bradford to deliver its future housing growth, there will be a need to deliver new homes on both brownfield and greenfield land. For the latter, there will be a requirement to release Green Belt land in sustainable locations to accommodate housing growth. These Green Belt releases should align with the Council's settlement hierarchy.</p>	<p>the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>In revising the Policy HO3 (housing distribution) and SC7 consideration has been given to a number of factors to determine which areas of the district will see Green Belt release – including looking at the settlement hierarchy.</p>	
	<p>11i. The whole of this statement has never been taken seriously or adhered to! If Green Belt has played "a valuable role", it has been because of its' worth to builders and the council, not to the general public to enjoy. Have all the Brownfield sites been exhausted? NO! Leave Green Belt as Green Belt!! Once it has gone, it is gone forever. People need to aspire to live further from the city centre and nearer to the countryside. That's why it's called a "property ladder"</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that</p>	<p>CSPRQ100</p>

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	as people try to improve themselves and move up.	exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.	
	11j. I think there needs to be a greater emphasis on (and a coherent plan for) the delivery of genuinely affordable housing (ie housing that reflects not just the needs but also the earnings/incomes of local people). Just before work on the Local Plan started Councillors passed a resolution to support housing delivery via Community Land Trusts and self-build. This resolution has not been reflected in any of the documents associated with the Local Plan despite the fact that these delivery methods might form a useful part of the strategy.	Comment noted. Policy HO11 sets out the policy on Affordable Housing and Policy HO8 on Housing Mix. The Council has maintained a register of interest of self and custom build housing to establish any demand within this District for this type of housing. The Council's has responded to this issue within Part E of Policy HO8.	CSPRQ111
	11k. Welcome as it is that the above considerations will be followed, it would be more reassuring if, before settlement housing and employment land targets are reviewed and re-set, a number of other factors are seen to be fed into the process and downward/upward adjustments applied as appropriate - these factors being an assessment of how much of a settlement's remaining new dwellings target would need to be on	The starting point for reviewing the housing requirement is to apply the government's standard methodology for calculating housing need. Once the housing requirement has been established, consideration is then given to its distribution and how it can be delivered taking into account the deliverable and developable land supply. In line with the NPPF the Council takes an	CSPRQ115

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	green belt land (rather than greenfield or PDL), the related HRA issues and also any impacts on the visitor numbers and their experience.	<p>approach to maximising the use of previously developed land in the first instances. Consideration is also given to other key constraints including the impact of development on the European designated sites of the South Pennine Moors (SPA & SAC).</p> <p>Green Belt land is only considered where exceptional circumstances can be demonstrated.</p>	
	11l. You also need to protect the urban green space this is as precious to the local residents as green belt land	Open space is covered by a separate planning policy designation – it is different to Green Belt land and is protected for different reasons/purposes. Policy EN1 already protects designated open space.	CSPRQ117
	12. Environmental benefits of the green belt		
	<p>12a. We encourage the inclusion of concepts to prioritise land outside of the green belt for development, however it must be remembered that these areas still hold intrinsic value and often provide important habitats for species such as invertebrates. We would encourage retention of as much green belt as possible in order to support national aims to contribute towards nature recover networks as per the 25 Year Environment Plan.</p> <p>The current adopted core strategy refers to a release of 135ha of green belt land; we would encourage this area to be reduced if possible with clarification provided to the areas and justification for land release</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily</p>	CSPRQ026

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	provided.	<p>underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>Core Strategy Policy EN2 has been updated to introduce the need for new developments to secure a measureable net-gain for biodiversity, thereby contributing to the aims of the 25 Year Environment Plan.</p>	
	12b. Enough of the green belt has already been built on destroying wildlife, flora and fauna. our children need to have places to play and go for walks	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and</p>	CSPRQ101

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		<p>fewer settlements will see Green Belt release.</p> <p>Policy EN1 protects designated open space and requires the provision of open space in new development. The review of policy EN2 requires new development to deliver a measure net gain for biodiversity.</p>	
	<p>13. General</p>		
	<p>13a. If the council over-promotes greenbelt development; there will be an even greater divide between the have-nots in the city centre and the middle classes in the villages. We need to encourage luxury-flat development for middle-aged hipsters and for the gay community. They are not bothered about gardens and school-standards in the inner city. The pink pound turned round salford's fortunes and it could do the same in Bradford.</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure.</p> <p>The Core Strategy must consider providing for housing for everyone in the district taking account of any specialist housing needs for different groups in the community. Policy HO8: Housing Mix sets out the guidance of the types of homes</p>	<p>CSPRQ033</p>

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		to be provided in different parts of the District. It already promotes the increase in supply of high quality flats, particularly in city and town centre locations.	
	13b. Bradford is circa 60-65% rural and this is one of its remaining positive points. This Council has destroyed large parts of it.	Comments noted. Revised Policies SC7 and HO3 now only look at limited Green Belt release and therefore will protect the countryside.	CSPRQ025
	13c. all work in progress. eliminate 'c' concentrate on the Bradford District	Comment unclear. No response required.	CSPRQ026
	13d. OK but peoples housing and employment is first priority too much NIMBY talk evolves.	The CSPR looks at the limited release of Green Belt land in some settlements to ensure the housing and employment needs of the District are met.	CSPRQ029
	13e. d) make as much use as possible of unoccupied properties.	Under occupied properties would fall under a) brownfield sites and underutilised land.	CSPRQ071
	13f. you ask the question in first paragraph then answer it in second paragraph.	Comments noted.	CSPRQ045
	14. Site promotions		
	14a. AD/013 is an ideal site for development and is available now. No access and highways issues with no additional pressure on Addingham Main Street. Amend and change the Green Belt boundaries to allow this ideal site to be developed.	The opportunity to comment on the proposed site allocations will be provided later in the year when the Preferred Option Allocations DPD is published. Policy SC7 sets out the exceptional	CSPRQ022

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		<p>circumstances for Green Belt release. However, it should be noted that the CSCR has concluded that the scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p>	
	<p>14b. In relation to the pending Green Belt Review we again wish to promote land at Crossfield Road in Oxenhope (Site OX/003) as a site suitable for housing allocation, which has previously been submitted to the Local Plan at several consultation stages. The site also presents as an opportunity to provide a revised defensible green belt boundary to endure beyond the end of the plan period, due to the presence of the stone wall and stream that creates a natural boundary. The land between this natural boundary and the rear of existing houses creates a developable site for a limited number of houses within the village of Oxenhope.</p>	<p>The opportunity to comment on the proposed site allocations will be provided later in the year when the Preferred Option Allocations DPD is published.</p> <p>Policy SC7 sets out the exceptional circumstances for Green Belt release. However, it should be noted that the CSCR has concluded that the scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release. The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD.</p>	<p>CSCR035</p>
	<p>14c. The site is located at the edge of Oakworth and at the edge of the Green Belt. The site at Wide Lane is considered to be previously developed land as set out within the covering letter. The development of the site could provide a substantial boundary for the Green Belt and would require only a minor amendment to the Green Belt boundary.</p>	<p>The opportunity to comment on the proposed site allocations will be provided later in the year when the Preferred Option Allocations DPD is published.</p> <p>Policy SC7 sets out the exceptional circumstances for Green Belt release. However, it should be noted that the CSCR has concluded</p>	<p>CSCR038</p>

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		<p>that the scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release. The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD.</p>	
	<p>14d. Greenlight Developments/Stonebridge Homes site on Land on the West side of Derry Hill, Menston offers a sustainable housing option outside of the Green Belt. Greenlight Developments/Stonebridge Homes notes that the Council is proposing to undertake a review of its Green Belt. The NPPF (Paragraph 137) is clear that: "Before concluding that exceptional circumstances exists to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be examined through the examination of its strategic policies".</p>	<p>The opportunity to comment on specific site allocations will be provided later in the year when the Preferred Option Allocations DPD is published.</p> <p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations as well as having discussions with neighbouring authorities, in line with the requirements of the NPPF.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially</p>	<p>CSPR036</p>

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		lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.	
	<p>14e. Finally, the Council will be required to identify a sufficient number of housing land allocations and/or safeguarded land allocations to deliver long term permanence to the Green Belt. Bellway Homes' land interest at the Carr Bank, Riddlesden site extends beyond the northern boundary of the area proposed as a housing allocation as shown on the Illustrative Masterplan. The land is in one ownership and benefits from similar deliverability and sustainability credentials as the southern parcel of the site currently being proposed as a housing allocation. It is our view that this area should be considered for allocation as safeguarded land within the forthcoming Site Allocations DPD and we would like to discuss this proposal in more detail with the Council.</p>	<p>The opportunity to comment on the proposed site allocations will be provided later in the year when the Preferred Option Allocations DPD is published.</p> <p>Policy SC7 sets out the exceptional circumstances for Green Belt release. However, it should be noted that the CSPR has concluded that the scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release. The specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD. Revised Policy SC7 acknowledges the need to identify safeguarded land to meet longer term development needs. Such sites will also be identified in the Allocations DPD.</p>	CSPR043
	<p>14f. Policy SC7 recognises the need to review the Green Belt in the District to accommodate both housing and employment land needs. In doing so the Council recognises that the Framework requires all other reasonable options need to be explored before concluding exceptional circumstances exist.</p>	<p>The Council has to identify sufficient land to meet the housing and employment needs of the district. The Council has taken an approach to minimise the need for Green Belt release by maximising the reuse of previously developed land and looking at increased densities in suitable locations</p>	CSPR017

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	<p>It is considered that the exceptional circumstances do exist in Bradford to review Green Belt boundaries to facilitate current and longer term housing and employment requirements. In meeting those requirements the Council must ensure that its methodology and review of the Green Belt are robust and justified.</p> <p>Given the lack of opportunities within East Morton to accommodate the current Core Strategy requirement, this will need to be provided through a review and revision to the Green Belt boundaries. Carter Jonas is instructed to work with the Council to bring forward land at the Fardew Golf Course (Site EM/012) to meet (part of) the settlement's housing requirement.</p>	<p>as well as having discussions with neighbouring authorities.</p> <p>However, the Council has concluded that exceptional circumstances exist to justify the limited release of Green Belt land in some areas of the District. This position is primarily underpinned by evidence work on housing need, which utilises the Government's Standard Method to set a new lower minimum housing need figure. The scale of Green Belt release is substantially lower than that in the adopted Core Strategy and fewer settlements will see Green Belt release.</p> <p>Should East Morton require Green Belt release the specific sites which will be released from the Green Belt will be identified as part of the site assessment process for the Allocations DPD.</p>	

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	1. General		
	1a. No comment	Noted.	CSPRQ055 CSPRQ113 CSPR003 CSPR019
	1b. Agree / Support	Noted.	CSPRQ002 CSPRQ007 CSPRQ064 CSPR020
	<p>1c. Support the Council in updating its viability evidence and would as previously stated recommend that the Council work closely with the home building industry in preparing the viability assessment to ensure that it is robust and based on appropriate evidence and assumptions.</p> <p>Welcome further engagement</p>	Noted. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. This will include engagement with all relevant stakeholders.	CSPR002 CSPR005 CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR012

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			CSPR013
	1d. The need for this policy review is supported.	Support noted.	CSPRQ002 CSPRQ007 CSPRQ008 CSPRQ070
	1e. Keepmoat Homes supports the production of up to date viability evidence in order to ensure that policies are appropriate, suitable for the plan period, and do not affect the viability of development.	Support noted.	CSPR044
	2. Approach to viability		
	2a. I agree with the revised national planning policy and guidance which requires viability to be considered at the plan-making stage rather than at the planning application stage but I have no idea how it will be done - it will need a corporate approach.	Comment noted.	CSPRQ016
	2b. There is a lot of work to be done in this area, however with the dramatic loss of staff in Bradford Council it maybe very difficult to achieve.	No comment required.	CSPRQ008
	2c. There is very little affordable housing being built, property developers are far too greedy		CSPRQ101

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	2d. Again a statement rather than a conclusion, so is difficult to comment against.	No comment required.	CSPRQ062
	3. Viability Assessments		
	3a. Whilst we are aware of the Governments intention and the reason for this, we do have reservations about how accurately anyone can assess the viability of every site as part of the local plan making process. Only at the time a planning application is submitted can this be thoroughly tested. So whilst we appreciate that the Council will be aiming to carry out viability work at the plan making stage, there needs to be flexibility for this to be re-considered at the planning application stage, should a site not be able to deliver all policy requirements at a later date.	Noted. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. This will include a broad assessment of viability of a range of hypothetical site typologies. It is recognised that there will be individual site circumstances that cannot be assessed through the whole plan viability assessment on every site and therefore Policy ID2 sets out criteria for when a viability assessment may be appropriate in line with national policy and the PPG.	CSPRQ099
	3b. Viability assessments should be transparent from the start so planning applications can be considered fairly and properly. I fail to understand why this is only now being considered as the correct policy.	Noted. The government has updated its national planning guidance which now states the findings of a viability assessment should be presented clearly and viability assessments made publically available. The CSPR will update Policy ID2 in line with the latest changes to national planning policy,	CSPR030
	3c. Viability appraisals should be carried out before outline planning permissions to avoid duplication of	Noted. Applicants may submit a viability assessment as part of a pre application however	CSPRQ108

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	effort and distortations during the planning process.	it is not considered appropriate to request a viability assessment for a pre application as the detailed costs of the scheme may not be known at this stage. In line with PPG there may be site specific circumstances which mean viability will need to be considered as part of determining a planning application. This is reflected in Policy ID2.	
	3d. Viability assessments at the individual planning application stage have been shown to be capable of manipulation to minimise the level of developer contribution for affordable housing and infrastructure. It is hoped that this new approach will provide a more robust method of assessing viability.	Noted.	CSPRQ107
	3e. Viability assessments have been shown to be capable of manipulation with small changes in figures for, for example projected sale price of houses, producing radically different results. In particular we would draw attention to the need to take account of overpayment for sites and suggest that this should not be a valid reason for claiming that a site is unviable unless affordable housing targets are reduced or eliminated. Unless BMDC takes a more robust approach, affordable housing targets and other developer contributions will not be sufficient to take into account the local effects of development.	Noted. PPG is clear the price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. The government has updated its national planning guidance which now states that the findings of a viability assessment should be presented clearly and viability assessments made publically available. The CSPR will update Policy ID2 in line with the latest changes to national planning policy,	CSPRQ112

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	3f. Viability Policies within the Core Strategy and site specific requirements within the Site Allocations document should not be so onerous to require planning applications to be supported by viability assessments.	Noted. The council will produce a whole plan viability assessment to ensure that any standards and requirements are considered broadly viable at the plan making stage. In line with PPG there may be exceptional site specific circumstances which mean viability will need to be considered as part of determining a planning application. This is reflected in Policy ID2.	CSPR017
	3g. Totally agree. For too long developers have abused the Viability Assessment Mechanism. Once a planning application has been submitted and granted, then that is what the developer has to deliver.	Comment noted.	CSPRQ109
	4. Viability issues		
	4a. We are aware that in many parts of the country viability has formed the basis upon which developers have abandoned undertakings or sought to set aside planning conditions. We would welcome a vigorous approach by the Council to ensure that this does not happen in Bradford during the period of the Local Plan.	Comment noted. It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ114
	4b. I strongly suspect developers will continue to claim financial viability problems and wriggle out of providing affordable housing etc. The developers and their shareholders never seem to be very poor! And are the financial viability reports created by/for the developers	Noted. The government has updated its national planning guidance which now states the findings of a viability assessment should be presented clearly and viability assessments made publically available. The CSPR will update Policy ID2 in line with the latest changes to national planning	CSPRQ116

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	still private and not able to be publically scrutinised?	policy,	
	4c. As stated before, if the Council seeks to argue that economic growth will be sufficient to generate housing need and demand above the baseline indicated in the 2014 based household projections/the national formula then it should also reflect this in its assessments of viability because in a thriving economy more sites become viable and profits from development increase.	Noted. The whole plan viability assessment will be informed by latest market evidence.	CSPRQ111
	4d. So, the goal posts can be continually moved?! And usually the builders gets what the builder want. What about the existing residents, the council tax payers? We never get what we want. The council is supposed to work for us.	Noted. The government has updated its national planning guidance which now states the findings of a viability assessment should be presented clearly and viability assessments made publically available. The CSPR will update Policy ID2 in line with the latest changes to national planning	CSPRQ100
	4e. Although contributions are important, they should not influence the choice of a development site. This would undermine the other policies.	Noted. In line with national planning policy the council must consider the likely economic viability of potential site allocations. Sites will be assessed against a range other factors.	CSPRQ078
	4f. Bradford Council should be stronger on this point. For example, persimmon homes should never have been allowed to reduce their contribution to local infrastructure costs for the new Cote Farm development at Thackley. Developers make millions of pounds in the region and it is only right and reasonable that they should pay to alleviate the problems that new	Comment noted. It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ092

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	houses can cause.		
	4g. Many claims of unviability by developers are spurious.	Comment noted. It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ080
	4h. Developers need to contribute significantly more to the local community.	Comment noted. The local plan will set out the contributions required from development. However In line with national planning policy the council must consider the likely economic viability at plan making stage. The council will produce a whole plan viability assessment to ensure that any standards and requirements are considered broadly viable at the plan making stage.	CSPRQ088
	5. Infrastructure		
	5a. Current infrastructure is weak and poor, if developers cannot contribute to rectify then developments should not go ahead	Comment noted. The local plan will set out the contributions required from development. Planning obligations will be used alongside range of other funding sources to support infrastructure provision across the District. However In line with national planning policy the council must consider the likely economic viability at plan making stage. The council will produce a whole plan viability assessment to ensure that any standards and requirements are considered broadly viable at the plan making stage.	CSPRQ089

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	6. Affordable Housing		
	6a. Difine affordable housing prices...they are a joke where I live.. well out of reach of most	The NPPF annex defines affordable housing.	CSPRQ084
	6b. The adopted Core Strategy already recognises that the different areas within the Bradford district can have different housing needs and as such produces different affordable housing targets. It is our view that this approach should be continued through to the revised Core Strategy, but to reflect the new information which is gathered as part of the revised evidence base studies. We would also point out that the final affordable housing contributions, whilst typologies may be employed at the early stage to better build in viability at an early stage, affordable housing should ultimately be able to be negotiated through viability assessments where required to account for site abnormal costs and market changes. We welcome the opportunity to engage with Bradford's upcoming consultations on the Local Plan and associated documents. Please use the contact details provided below for any future correspondence.	Noted. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. This will include a broad assessment of viability of a range of hypothetical site typologies. It is recognised that there will be individual site circumstances that cannot be assessed through the whole plan viability assessment on every site and therefore Policy ID2 sets out criteria for when a viability assessment may be appropriate in line with national policy and the PPG.	CSPRQ075 CSPRQ076
	6c. Long term planning for life will give a long term future to the area, people of Bradford are sick of being embarrassed to say this is their home town, I grew up loving where I came from, I grew up on the Holmewood estate with decent people who were	Comment noted. Holme Wood is noted as a regeneration priority area in the CSPR. This comment is not considered relevant to Policy ID2.	CSPRQ063

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	happy with where they lived and what they had. It is sad that there is no investment for anybody in this area, WHY?		
	<p>6d. A common complaint is that developers tend to regard construction on any PDL as being unviable, unless it's for expensive housing (ie. high profit margin) or subsidised (thus hence lower cost). So, the PDL sits there for years, gradually deteriorating. Why doesn't CBMDC take a grip of this and OBLIGE developers to build on the large tracts of PDL in the inner city areas, to revitalise the city? It will only take one big, prestigious, affordable development in the inner city area to convince people that they'll be better-off living in the city, having shops, restaurants and other facilities close to hand, so they're not spending their earnings on fuel and travel costs, and it's quick, easy and safe to get to their workplace, walking or cycling. As a university city, and one with hotels, well-reputed companies in situ, nationally reputed museums etc. and (said to be) a growing city, why not induce a developer to build a multi-occupancy project to return the city to some national prominence? The criteria for "viability" need to be agreed, not determined by the developer based solely on profit potential. Some of these developers, with substantial landbanked PDL, are holding Bradford to ransom, and we (residents of this once-proud city) are seeing sores and wounds in our landscape, persisting for decades,</p>	<p>National planning policy while prioritising brownfield/PDL land does not include a brownfield first policy. The council cannot oblige private developers to build on PDL sites.. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage</p> <p>It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.</p>	CSPRQ067

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	with the developers crying that "There's pollution" or just waiting for the Council to offer more cash for them to start building. And meanwhile, CBMDC just keeps accepting these arguments and pushing people into suburban areas whilst the heritage fabric of the city decays.		
6e.	The last 3 words of the above "Most Public benefit" must be a strong consideration and I am in favour of all this being considered at the plan-making stage. Please do not "plan to fail" by "failing to plan".	Noted. It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ058
6f.	Sounds good but at the end of it all if developers have to provide more than the basics, unit costs of housing will rise.	It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. this will include any standards and policy requirements. PPG is clear policy requirements should be factored into the price paid for land and therefore should not increase unit costs	CSPRQ061
6g.	large developers and larger sites i.e. above 30 dwellings should have higher contributions (if not cover contributions that would be normally be imposed on smaller site) to allow smaller local developers to make their sites financially viable	Noted. The council recognise larger sites may have higher infrastructure costs. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. this will include any standards and policy requirements on	CSPRQ060

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		a range of site typologies	
	6h. Don't be fooled by professional arguments. They are paid to bring about a result which is contradictory to the interests of the community. Bringing forward these considerations is a good idea and hopefully a more cost effective in resisting these forces.	Comment noted. It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ056
	6i. Planners must set out their viability before hand; this would allow a mark to be set in which if the developer tries to renegotiate on the terms of viability then they are to blame and take the hit. Because as business developers they should know fully how much the scheme should cost and how much profit they are to gain before submitting a plan. Viability later on in the scheme, should not be an issue and should then not be allowed as an excuse to renegotiate terms or deals etc.	Noted. This is the approach advocated in the latest PPG. It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ021
	6j. Plan-making should include detailed site assessment by relevant parties, such as water authorities and traffic departments. These must never be left until the planning application stage and site visits are necessary.	In line with PPG the Council will undertake a whole plan viability assessment at the plan making stage. This will include cost assumptions. However PPG is clear this should not include viability assessment for every site but a broad assessment of viability based on a range of hypothetical site and scheme typologies.	CSPRQ022

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	7. General comments not related to the Plan		
	7a. To vague to comment	No comment required.	CSPRQ028
	7b. No NIMBY s please.	No comment required.	CSPRQ029
	7c. Now I am laughing...developers have walked all over you.	No comment required.	CSPRQ025
	7d. Developers get away with murder at the minute in Bradford. They need tob3 held to account. If they. Ant provid3 th3 infrastructure then don't allow them to build.	No comment required.	CSPRQ032
	7e. Recent comments by Chairman of the Planning Committeee have done absolutely nothing for the reputation of the Council.	No comment required.	CSPRQ033
	7f. you answer the question again	No comment required.	CSPRQ045
	7g. Is it worth it? I assume is the question being asked. Well, you have to start somewhere.	No comment required.	CSPRQ034
	7h. Disagree, who states that land isn't viable. Often this is the developer, who states that they cannot make any profit. This is the same issue which Manchester Council faced a couple of years ago in January. On review in February, land that wasn't viable suddenly became viable. Consider liaising with	Noted. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. However it is recognised that there will be individual site circumstances that cannot be assessed through the whole plan viability assessment on every site and therefore Policy	CSPRQ035

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	Manchester Council about their methodology, Andy Burnham was responsible for the change.	ID2 sets out criteria for when a viability assessment may be appropriate in line with national policy and the PPG.	
	7i. Agreed community levy / 106 agreements and sill money MUST BE ADHERED TO NOT NEGOTIATED AWAY. THE PUBLIC OTHERWISE WILL HAVE NO FAITH IN PLANNING POLICY PROMISES	Noted. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. However it is recognised that there will be individual site circumstances that cannot be assessed through the whole plan viability assessment on every site and therefore Policy ID2 sets out criteria for when a viability assessment may be appropriate in line with national policy and the PPG. It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ039
	7j. Developers always seem to argue that sites are unviable/difficult etc and the Council should reduce planning obligations. This policy will be used to argue for sub standard development.	It is considered that Policy ID2 sets out a robust policy for viability assessment in line with the latest national policy and guidance.	CSPRQ048
	7k. The NPPF (Paragraph 57) still allows for viability to be considered at the planning application stage. It states, "...It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to viability assessment is a matter for the decision maker, having regard to all the	Comment noted. Noted. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. However it is recognised that there will be individual site circumstances that cannot be assessed through the whole plan viability assessment on every site and therefore Policy ID2 sets out criteria for when	CSPR036

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	<p>circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any changes in site circumstances since the plan was brought into force".</p> <p>Greenlight Developments/Stonebridge Homes notes that the Council is proposing to undertake viability work as part of its evidence base update. Therefore, at this time, Greenlight Developments/Stonebridge Homes do not wish to comment further on viability in advance of proper consideration of the evidence.</p>	<p>a viability assessment may be appropriate in line with national policy and the PPG</p>	
	<p><i>7l. [same for HO11 and ID2]</i> The adopted Core Strategy already recognises that the different areas within the Bradford district can have different housing needs and as such produces different affordable housing targets. It is our view that this approach should be continued through to the revised Core Strategy, but to reflect the new information which is gathered as part of the revised evidence base studies. We would also point out that the final affordable housing contributions, whilst typologies may be employed at the early stage to better build in viability at an early stage, affordable housing should ultimately be able to be negotiated through viability assessments where required to account for site abnormalities and market changes.</p> <p>Recommendation 7: Bradford should continue to ensure that the correct amount of affordable housing is provided with differing targets across the district and</p>	<p>Noted. In line with PPG the council will undertake a whole plan viability assessment at the plan making stage. This will include a broad assessment of viability of a range of hypothetical site typologies. It is recognised that there will be individual site circumstances that cannot be assessed through the whole plan viability assessment on every site and therefore Policy ID2 sets out criteria for when a viability assessment may be appropriate in line with national policy and the PPG.</p>	<p>CSPRQ034</p>

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	subject to viability assessments in the interests of effective and positive planning.		
	7m. There is evidence that major developers are making unreasonably large profits from new house building schemes and these should be strongly resisted by central and local government.	Noted. The revised PPG sets out how developers return should be defined for the purpose of viability assessments.	CSPRQ051
	7n. We also welcome the reference in the Scoping Report to the cumulative cost of all relevant policies being understood as it is important that the combined total impact of policy requests do no threaten the viability and deliverability of sites.	Noted	CSPR006 CSPR007 CSPR008 CSPR009 CSPR010 CSPR011 CSPR012 CSPR013
	8. Sub Area Approach		
	8a. The adopted Core Strategy already recognises that the different areas within the Bradford district can have different housing needs and as such produces different affordable housing targets. It is our view that this approach should be continued through to the revised Core Strategy, but to reflect the new information which is gathered as part of the revised	The Core Strategy will continue to apply a sub area approach to affordable housing delivery as set out in Policy HO11. This will be informed by the latest evince of housing need in the SHMA and latest viability evidence. .	CSPR014

Appendix 17: Policy ID2 - Comments Received and CBMDC Response

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	evidence base studies.		
	8b. We would also point out that with the final affordable housing and s106 contributions, whilst typologies may be employed at the early stage to better build in viability at an early stage, affordable housing should ultimately be able to be negotiated through viability assessments where required to account for site abnormalities and market changes.	<p>The NPPF/G is clear that viability assessment is primarily at the plan-making stage. It is the responsibility of the LPA, local community, stakeholders and developers to create informed realistic and deliverable policies. Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision-making stage. (NPPG Paragraph: 002 Reference ID: 10-002-20190509 Revision date: 09 05 2019).</p> <p>However, it is recognised that there will be individual site circumstances that cannot be assessed through the whole plan viability assessment on every site and therefore Policy ID2 sets out criteria for when a viability assessment may be appropriate in line with national policy and the PPG.</p>	CSPR014 CSPR015
	9. Sub-Areas		
	9a. In the Pennine villages areas therefore some Green Belt release if the 5 purposes of Green Belt set	Comments noted. The council will consider this through the green belt review. Any amendments	CSPR016

Appendix 17: Policy ID2 - Comments Received and CBMDC Response

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	out in NPPF are performing weakly and the location is highly sustainable should be considered for boundary amendments.	to Greenbelt boundaries will be undertaken through the allocations DPD if justified by exceptional circumstances.	
	10. Sustainable Development		
	10a. BCSPR Appendix 2 Table 2.1 Policy P1 the Presumption in favour of sustainable development refers to para 11 of NPPF2018 and states this has not changed yet there are wording and indeed footnotes content to para 11 NPPF2018 which have changed compared to para 14 NPPF2012.	Comments noted. the council will update the CSPR to ensure it is fully aligned with the latest national planning policy.	CSPR016
	11. Individual Site Promotion		
	11a. specific comment on deliverability of individual site allocations.	these comments is not relevant to this consultation. The Allocations DPD will be published in the autumn and comments related to sites should be submitted at that time.	CSPR014 CSPR015
	12. Responses		
	12a. Para 4.1 refers to the Brownfield Register. Will there be a further Call for Sites as part of the next stage of consultation and the updating of the SHLAA? Will there be engagement with landowners and developers?	Comment not considered relevant to Policy ID2. The council will continue to update land available and consider new sites and engagement with landowners/developers throughout the preparation of the Local Plan.	CSPR016
	12b. As set out above, it is important that the CSPR is	Comment noted. In line with PPG the council will	CSPRQ018

Appendix 17: Policy ID2 - Comments Received and CBMDC Response

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	informed by robust up to date evidence on viability that influences the strategy for delivering sustainable development across the district. This will ensure that policies are realistic and that the Plan is deliverable, particularly that housing allocations are deliverable.	undertake a whole plan viability assessment at the plan making stage.	
	13. Oakworth		
	13a. The site is being promoted by Candelisa, a local developer, who consider that the development of the site is viable and could provide an essential contribution to the housing requirement for Oakworth and the district.	This comment is not relevant to this consultation. The Allocations DPD will be published in the autumn and comments related to sites should be submitted at that time.	CSPR038
	13b. I would like to object to the proposed site allocation that uses Greenfield land at the side of the Leeds Liverpool canal. I ma talking specifically about site references NE/065, NE/141, NE/069. I believe changing the use of this land to residential development would have a serious impact on wildlife as well as a social impact. Many people use the canal to get a taste of the countryside without the need to hop in a car and travel therefore using this greenspace would be counter productive to the environment causing more pollution and congestion with cars travelling further afield. Please do not give up this precious green space. There are plenty of brownfield sites that can be used to avoid this. Thanks	This comment is not relevant to this consultation. The Allocations DPD will be published in the autumn and comments related to sites should be submitted at that time.	CSPRQ096

Appendix 17: Policy ID2 - Comments Received and CBMDC Response

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	13c. Thackley and idle and greengates are all at breaking point with regards of traffic proposed changed to greengates junction will do little to support added traffic from recent developments in the commute to Leeds. The station is already oversubscribed with the car park being full but 730 each workday morning !!!!	Comment noted. comment not considered relevant to Policy ID2.	CSPRQ083

Appendix 18: Sustainability Appraisal (SA) Scoping Report - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General Comments		
	1a. No comment	Noted. No changes to the SA Scoping Report needed.	CSPRQ051 CSPRQ089 CSPRQ107 CSPR003 CSPR019
	1b. Very poorly done.	Noted. No changes to the SA Scoping Report needed.	CSPRQ088
	1c. Historic England strongly advises that the conservation team of your authority and your archaeological advisors at WYAS are closely involved throughout the preparation of the SEA/SA of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Comments noted and has formed part of the development of the SEA / SA.	CSPR004
	2. Review		
	2a. Needs further review going forward, likely further changes will have occurred when the inspector reviews the document next year?	At each iteration of the SA/SEA, the scoping report and its key elements will be updated as and where necessary. For example, baseline data may be updated with more recent and accurate	CSPRQ108

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		<p>data. Should any changes be made to the SA/SEA scope, this would be clearly noted and highlighted in the SA/SEA report.</p> <p>No changes to the SA Scoping Report needed.</p>	
	<p>3. General issue of "Sustainability"</p>		
	<p>3a. Sustainability is subjective. Better to err on the side of caution.</p>	<p>In-line with best practice, the SA/SEA will conform with the precautionary principle i.e. where evidence is lacking to reach a conclusion, a precautionary approach is adopted and the worst-case scenario is assumed and appropriate measures will be recommended to avoid or mitigate this potential outcome. This is due to be clarified and thoroughly explained in the full SA/SEA appraisal methodology provided in future SA/SEA reports.</p> <p>No changes to the SA Scoping Report needed.</p>	<p>CSPRQ058</p>
	<p>3b. I am not happy about Sustainability: It can be construed in many ways and I feel that the report does not holistically cover the impact on each person a decision may have at BMDC. For example it may be sustainable for BMDC to amalgamate two workforces (Refuse with Parks) but the impact is that the services provided are either reduced, not done or are sub-standard. Thus quality is not being sustained (so quality is not sustainable). Nothing is sustainable so please don't use a word that describes some kind of holistic circular approach when it does not work and is especially not used in favour to enhance the livelihood</p>	<p>A key purpose of SA/SEA is to determine and evaluate the extent to which options in the Plan, when considered alone and cumulatively, are environmentally, economically and socially sustainable.</p> <p>In terms of potential impacts on local people in Bradford including the provision of services they rely on, this will form an important consideration in the SA when appraising options against SA Objectives including:</p> <p>10. <i>To provide the opportunity for everyone to live in quality housing which reflects individual</i></p>	<p>CSPRQ021</p>

Appendix 18: Sustainability Appraisal (SA) Scoping Report - Comments Received and CBMDC Response

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	of the common person, only your own staff.	<p><i>needs, preferences and resources'</i></p> <p>11. <i>'To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts...'</i></p> <p>No changes to the SA Scoping Report needed.</p>	
	3c. The ever increasing human population is not sustainable. It is demanded by the capitalist delusion that you must sell ever more things to ever more people. The capitalist system does not work. Every 20 years or so the whole thing crashes after a brief period of boom and virtually bankrupts the whole country and the people live in poverty for the succeeding twenty years bailing out the mess. Some better system is necessary.	<p>Noted.</p> <p>No changes to the SA Scoping Report needed.</p>	CSPRQ024
	4. Approach to the Sustainability Appraisal		
Table 6.1 – Sustainability Issues	4a. The scoping report gives no sense of what are core issues and what are not. This is problematic as minor impacts appear to be being given equal weight to major ones. In addition there doesn't seem to be a mechanism for evaluating the cumulative affects of impacts or of offsetting positive and negative outcomes/consequences of development. Arguably a sustainability appraisal should deliver an assessment that is equivalent to a cost /benefit analysis (eg in some areas building homes at volume might necessitate substantial investment in costly road infrastructure that does little to support businesses and therefore contributes little to long term economic	<p>It is necessary for the SEA scoping stage to draw out the 'key sustainability issues'. These are set out in detail for each topic in Table 6.1 of the SA Scoping Report.</p> <p>It is not necessarily feasible or appropriate to evaluate the key sustainability issues and set them out in a hierarchy of which is most important.</p> <p>It is not intended for these appraisals or for the identification of cumulative effects to be provided at the Scoping stage, but rather subsequent stages in the SA/SEA process will provide a detailed account of the likely cumulative,</p>	CSPRQ111

Appendix 18: Sustainability Appraisal (SA) Scoping Report - Comments Received and CBMDC Response

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	<p>growth; in another area housing development may require investment in a road but if the road acts as a gateway to the development of land for employment there may be a big economic benefit). Cumulative effects of negative impacts seem to be being ignored or treated as equivalent to a single negative impact.</p>	<p>synergistic and secondary effects of options and proposals in the Plan for each topic against each SA Objective. These appraisals will also provide a robust indication of the likely magnitude of effects. For example, a single site allocation for new homes may result in a minor increase in traffic and thus a minor impact on air quality through this pathway, whereas multiples sites of new homes will have a greater impact on traffic and thus a greater impact on air quality through this pathway. No changes to the SA Scoping Report needed.</p>	
	<p>5. Recycling</p>		
<p>Objective 2</p>	<p>5a. If you cannot recycle it then do not use it.</p>	<p>When appraising options and proposals in the Plan against SA Objective 2 'To minimise waste and increase the amount of waste which is re-used, recycled and recovered', rates of recycling/reusing/composting will form a key consideration, as per the indicators presented in the SA Framework. No changes to the SA Scoping Report needed.</p>	<p>CSPRQ034</p>
	<p>6. Transport</p>		
<p>Objective 9</p>	<p>6a. don't forget sustainable transport</p>	<p>Impacts of the Plan on sustainable transport, including local people's access to sustainable transport options, will form the primary consideration of appraisals of options against SA</p>	<p>CSPRQ039</p>

Appendix 18: Sustainability Appraisal (SA) Scoping Report - Comments Received and CBMDC Response

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		Objective 9: No changes to the SA Scoping Report needed.	
Table 6.1 – Sustainability Issues	6b. The current core strategy and the Scoping Report contain many aspirations, but little detailed planning. Specific plans are needed in a number of areas. Examples include: Charging points for electric vehicles. More specific plans are required than in TR1 given that a University of Leeds study has shown that, over a 4 year period, electric vehicles are cheaper to own than diesel, petrol or plug in hybrid vehicles. The major barrier to EV uptake is the provision of charging points, especially for housing with no garage.	The purpose of the scoping stage is to establish the scope of SA/SEA i.e. the spatial and temporal scope of the works as well as the baseline data to be used, key sustainability issues and themes as well as topics to be considered during SA/SEA. The SA/SEA will identify and evaluate the sustainability impacts of the Plan in detail at later stages of the programme. For example, when appraising the impacts of the Plan against SA Objective 9 'To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts', it is likely that the appraisal will consider the impacts on the provision and accessibility of electric car charging points. minimise waste and increase the amount of waste which is re-used, recycled and recovered', 4 'To No changes to the SA Scoping Report needed.	CSPRQ106
Table 7.2 – Sustainability Appraisal Framework	6c. Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9.	Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9. <ul style="list-style-type: none">• Number of Road Traffic Accidents is already an indicator included in SA Objective 16 'To improve safety and security for people and property' No changes to the SA Scoping Report needed.	CSPRQ110

Appendix 18: Sustainability Appraisal (SA) Scoping Report - Comments Received and CBMDC Response

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	7. Sustainable Urban Drainage Systems (SUDs)		
Table 7.2 – Sustainability Appraisal Framework	7a. Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)?	Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)? No changes to the SA Scoping Report needed.	CSPRQ110
	8. Historic Environment		
Table 6.1 – Sustainability Issues; Table 7.2 – Sustainability Appraisal Framework; Appendix A	8a. Comment on the Sustainability Appraisal, which is lacking key elements relating to the historic environment: <ul style="list-style-type: none"> • p.15 Built Environment/ Heritage section - this ignores mention of nationally important Scheduled Monuments. The National Planning Policy Framework also recognises the importance of undesignated heritage assets and their settings & the need for the Planning system to protect them. • p.22 Section 12. The term "archaeological" would usefully be added to the statement as in: "Number, or percentage or area of historic building, archaeological [added] sites and areas and their settings (both designated and non-designated) " • p.72 Implications for Core Strategy: There is mention here of Listed Buildings & Conservation Areas but no mention of Scheduled Monuments or non-designated heritage assets (including archaeological remains)), which have policies designed for their protection in the NPPF. 	Noted. The SA Objectives and PPP Review were updated to reflect these requested amendments.	CSPRQ046

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Table 7.2 – SA Objectives;	<p>8b.</p> <ul style="list-style-type: none"> • Table 7.2, SA Objective 12 - Object - It would be preferable if this SA Objective reflected the terminology used in the NPPF. • Table 7.2, SA Objective 12 amend to read:- “To conserve and, where appropriate, enhance the significance of heritage assets and their setting” 	<p>SA Objective on cultural heritage has been reworded to “To conserve and, where appropriate, enhance the significance of heritage assets and their setting”</p>	CSPR004
Appendix A	<p>8c.</p> <ul style="list-style-type: none"> • Appendix A, International Policies - Object - For completeness, this Section should also include the following: UNESCO World Heritage Convention • Appendix A, Local Policies - Object - For completeness, this Section should also include the following: Saltaire World Heritage Site Management Plan 	<p>Appendix A PPP Review has been updated to include the UNESCO World Heritage Convention as well as the Saltaire World Heritage Site Management Plan.</p>	CSPR004
9. Waste			
Table 6.1 – Sustainability Issues	<p>9a. The current core strategy and the Scoping Report contain many aspirations, but little detailed planning. Specific plans are needed in a number of areas. Examples include:</p> <p>Waste: the Council has made considerable progress in the treatment of waste and in recycling. More progress is needed in policies to eliminate single use plastics, a commitment to identify, in all cases, the destination and ultimate use of all the Council's recyclates and action on domestic food waste (National Infrastructure Commission Assessment recommends kerbside</p>	<p>The purpose of the scoping stage is to establish the scope of SA/SEA i.e. the spatial and temporal scope of the works as well as the baseline data to be used, key sustainability issues and themes as well as topics to be considered during SA/SEA.</p> <p>The SA/SEA will identify and evaluate the sustainability impacts of the Plan in detail at later stages of the programme. Options and proposals in the Plan will also be appraised in detail against SA Objectives 2 'To minimise waste and increase the amount of waste which is re-used, recycled and recovered', 4 'To safeguard and improve air,</p>	CSPRQ106

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Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	collection by 2025).	water and soil resources'. Between these objectives, the sustainability impacts of the Plan on waste and air quality will be thoroughly evaluated with recommendations for avoiding and mitigating adverse effects, and enhancing positive effects, provided throughout. No changes to the SA Scoping Report needed.	
	10. Air Quality		
SA Scoping Report (Table 6.1 – Sustainability Issues)	<p>10a. The current core strategy and the Scoping Report contain many aspirations, but little detailed planning. Specific plans are needed in a number of areas. Examples include:</p> <p>Charging points for electric vehicles. More specific plans are required than in TR1 given that a University of Leeds study has shown that, over a 4 year period, electric vehicles are cheaper to own than diesel, petrol or plug in hybrid vehicles. The major barrier to EV uptake is the provision of charging points, especially for housing with no garage.</p> <p>Air Quality: Bradford was recently identified by the Government as an air pollution hotspot and has four air quality management areas. What new plans does the Council now have to improve air quality in Bradford, not only in the Air Quality Management areas, but throughout the District? How does the Council propose to access the Government funding that is available for this purpose and are there plans to</p>	<p>The purpose of the scoping stage is to establish the scope of SA/SEA i.e. the spatial and temporal scope of the works as well as the baseline data to be used, key sustainability issues and themes as well as topics to be considered during SA/SEA.</p> <p>The SA/SEA will identify and evaluate the sustainability impacts of the Plan in detail at later stages of the programme. Options and proposals in the Plan will also be appraised in detail against SA Objectives 4 'To safeguard and improve air, water and soil resources', 9 'To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts' and 10 'Reduce congestion and pollution by increasing transport choice and reducing the need to travel by lorry/private car'. Between these objectives, the sustainability impacts of the Plan on waste and air quality will be thoroughly evaluated with recommendations for avoiding and mitigating adverse effects, and enhancing positive effects,</p>	CSPRQ106

Appendix 18: Sustainability Appraisal (SA) Scoping Report - Comments Received and CBMDC Response

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	work with the West Yorkshire LES?	provided throughout. No changes to the SA Scoping Report needed.	
Table 6.1 – Sustainability Issues	10b. Air quality is going to be of increasing concern and importance, and I think the Council needs to identify, as a matter of priority, the green wedges and corridors within and at the edge of the urban areas, that contribute positively and significantly to the flow of clean fresh air into the towns and cities, and which help to remove polluted air. Also it is important to recognize the value of trees in the urban environment in being able to absorb pollutants, and to increase the community's enjoyment and physical and mental health. Urban trees need to be given greater protection.	Air quality will be a key consideration during the SA/SEA. Individual and cumulative impacts of all options and proposals on air quality will be accounted for in detail and thoroughly when identifying and evaluating the likely effects on SA Objectives 4 ' <i>To safeguard and improve air, water and soil resources</i> ' and 10 ' <i>Reduce congestion and pollution by increasing transport choice and reducing the need to travel by lorry/private car</i> '. The value of trees and other green infrastructure elements will form an important consideration in terms of avoiding and mitigating impacts on air quality. The protection and enhancement of the network of trees in Bradford will be an important consideration when appraising Options against SA Objective 5 ' <i>To conserve and enhance the internationally, nationally and locally valued wildlife species and habitats</i> '. No changes to the SA Scoping Report needed.	CSPRQ116
Table 7.2 – Sustainability Appraisal Framework	10c. Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)? Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9.	Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)? Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account	CSPRQ110

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		when developing section 9. <ul style="list-style-type: none"> Number of Road Traffic Accidents is already an indicator included in SA Objective 16 <i>'To improve safety and security for people and property'</i> <p>No changes to the SA Scoping Report needed.</p>	
	11. Health		
SA Scoping Report (Table 6.1 – Sustainability Issues)	11a. "Since the Bradford District is one of poorer health and greater deprivation than the UK average, I think it is important not to allow housing developments and population growth to outpace the available NHS services and support, and the school services. Health and education services, when stretched to their limits, will inevitably result in poorer outcomes than where there is some spare capacity in the services for the population they are serving. Planning decisions seem to be overoptimistic as to how well the local services can cope with the extra people that arrive with large new developments.	The SA/SEA will carefully consider the accessibility of health services and facilities for existing and new local people, including GP surgeries and NHS hospitals. This is included as an indicator, 'Access to services and facilities' for SA Objective 17 <i>'To provide the conditions and services to improve health and well-being and reduce inequality to access to health and social care.'</i> <p>No changes to the SA Scoping Report needed.</p>	CSPRQ116
	12. Open Spaces		
SA Scoping Report (Table 6.1 – Sustainability Issues)	12a. I believe the Council should also tighten up the policy on protecting the open green spaces that are so important to both individual and social wellbeing. Planning policy appears to fail to qualify the value of green space. Developers offer the minimum square patch of neatly trimmed grass surrounded by tarmac, concrete, and uninspiring buildings, and with just a few	As a result of the Scoping stage, appraisals carried out in the SA/SEA will carefully consider the impacts of proposals and options being considered for the Plan on open spaces and green spaces due to their value in terms of community cohesion, biodiversity, landscape and townscape character and the setting of heritage	CSPRQ116

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	<p>token spindly saplings to replace beautiful mature trees felled to make room for the development. The replacement green patch, if it meets the required area, seems to be assessed as having the same value as mature trees, dry stone walls, babbling brooks and thriving wildlife of high biodiversity. Green space should be given a score as to its value in terms of public enjoyment and benefit to health and wellbeing, and then given the appropriate degree of protection.</p>	<p>assets and historic areas. Where potential adverse effects are identified, recommendations will be made to help avoid or mitigate these.</p> <p>No changes to the SA Scoping Report needed.</p>	
	<p>13. Natural Environment</p>		
<p>Table 6.1 – Sustainability Issues</p>	<p>13a. Landscape Character Areas should also be given more protection.</p>	<p>Landscape Character Areas within and coincident with the District are identified in the Baseline Information, as presented in Appendix B of the Scoping Report. This baseline information is transposed into the SA Framework and so appraisals of options against SA Objective 6 '<i>To maintain, protect and enhance the character of area's natural and man-made landscapes</i>' would include consideration of how development conforms with landscape character areas.</p> <p>No changes to the SA Scoping Report needed.</p>	<p>CSPRQ116</p>
	<p>13b. We welcome the identified plans and programmes in Appendix A but suggest that you also consider the following:</p> <ul style="list-style-type: none"> • South Pennine Moors Site Improvement Plan. Available online at: http://publications.naturalengland.org.uk/publication/5412834661892096 	<p>Appendix A PPP Review has been amended to include the following:</p> <ul style="list-style-type: none"> • South Pennine Moors Site Improvement Plan • The Nidderdale AONB Management Plan • Natural Environment and Rural Communities Act 2006 	<p>CSPR045</p>

Appendix 18: Sustainability Appraisal (SA) Scoping Report - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	<ul style="list-style-type: none"> • The Nidderdale AONB Management Plan. Available online at: https://nidderdaleaonb.org.uk/ • Natural Environment and Rural Communities Act 2006. Available online at: http://www.legislation.gov.uk/ukpga/2006/16/contents • Defra Rights of Way Circular 01/09. Available online at: https://www.gov.uk/government/publications/rights-of-way-circular-1-09 • Bradford Rights of Way Improvement Plan. Available online at: https://www.bradford.gov.uk/environment/country-side-and-rights-of-way/rights-of-way-improvements/ • Bradford Biodiversity Action Plan. Available online at: https://www.bradford.gov.uk/environment/country-side-and-rights-of-way/biodiversity/ • National biodiversity climate change vulnerability model. Available online at: http://webarchive.nationalarchives.gov.uk/20140605090108/http://naturalengland.org.uk/ourwork/climateandenergy/climatechange/vulnerability/nationalvulnerabilityassessment.aspx 	<ul style="list-style-type: none"> • Defra Rights of Way Circular 01/09 • Bradford Rights of Way Improvement Plan • Bradford Biodiversity Action Plan • National biodiversity climate change vulnerability model 	
Table 7.2 – SA Objectives; Appendix A	<p>13c. Natural England broadly welcomes the report and has the following comments to make.</p> <p>We recommend that that protected species and ancient woodland should be considered in the indicators under objective 5 To conserve and enhance the internationally, nationally and locally valued wildlife species and habitats.</p>	<p>Protected species and Ancient woodland have been included as indicators under the SA Objective on biodiversity.</p>	CSPR045

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	<p>13d. We are pleased to see and have undertaken initial discussions with Bradford Council regarding the scope of the SFRA update. Following these discussions we are able to offer technical advice regarding the development of the SFRA outside of the statutory consultation process and are happy to continue discussions to agree what service we can offer and when this is needed to develop the SFRA.</p> <p>We also support that core strategy policy EN7 – Flood Risk may also need to be updated subject to the SFRA review.</p>	<p>Noted. No changes to the SA Scoping Report needed.</p>	<p>CSPR031</p>
	<p>14. Tourism</p>		
<p>Table 7.2 – Sustainability Appraisal Framework</p>	<p>14a. Page 23, section 15 'indicators'. Which document provides evidence of 'More visitors to the District and greater spend' and 'Proportion of the District population undertaking regular physical activity' or has this evidence yet to be gathered?</p>	<p>Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9.</p> <ul style="list-style-type: none"> • Number of Road Traffic Accidents is already an indicator included in SA Objective 16 'To improve safety and security for people and property' <p>No changes to the SA Scoping Report needed.</p>	<p>CSPRQ110</p>

Appendix 19 - Habitats Regulations Assessment (HRA) - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General		
	1a. No comments to make on the Habitats Regulations Assessment Scoping Report.	Noted.	CSPR003 CSPRQ016 CSPRQ051 CSPRQ058 CSPRQ061 CPSRQ077 CSPRQ107
	1b. Craven District Council has no specific comment to make in this regard.	Noted.	CSPR019
	1c. At least someone is doing something.	Comments noted.	CSPRQ034
	1d. You need to explain this further	Further detail can be found in the CSPR Preferred Options HRA.	CSPRQ006
	1e. This document is inaccessible.	Further detail and explanation of the HRA process can be found in the CSPR Preferred Options HRA report. An executive summary at the beginning of the document will help to explain the HRA more clearly.	CSPRQ088
	1f. Habitats are like mushrooms, sometimes you only get to consume it once	Comments noted.	CSPRQ009
	2. Review of HRA (post Brexit)		
	2a. The HRA will need to be reviewed when we leave	Consideration will be given to any changes to the legislation regarding Habitats Regulation	CSPR030

Appendix 19 - Habitats Regulations Assessment (HRA) - Comments Received and CBMDC Response

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	the EU.	Assessments if/when they occur.	
	2b. An area of weakness in the original Core Strategy, needs further attention on account of BREXIT and possible further updates through Defra etc after 29th March.	<p>Habitats Regulations Assessment is derived from EC Directives which are currently transposed into domestic legislation via the Conservation of Habitats and Species Regulations 2017.</p> <p>The UK government has published the draft Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, the amended Regulations confirm that these provisions will be retained if the UK leaves the EU.</p>	CSPRQ108
	3. HRA & General development		
	3a. CBDMC must protect local habitats as it makes the district a much better place to live for both us and the wildlife. Who wants to live in a concrete jungle?	Comments noted.	CSPRQ039
	3b The HRA is important but should not be a priority over housing.	The Council has a legal requirement to prepare a Habitats Regulation Assessment to assess whether or not a proposal, policy or plan would adversely affect the integrity of the South Pennine Moors SPA/SAC (European Protected Site) either alone or in combination with other plans. In determining the location for new development the Council has to take account of the findings of the HRA.	CSPRQ26

Appendix 19 - Habitats Regulations Assessment (HRA) - Comments Received and CBMDC Response

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	3c. Can we please include children as requiring a safe, clean and green environment. Currently owls have better protection of their habitat.	<p>Promoting healthy and safe communities is a key requirement of the NPPF and something that Bradford Council strives to achieve throughout plan-making.</p> <p>Policy EN1 of the adopted Core Strategy aims to protect open spaces and ensure that there are opportunities for sport and recreation across the District.</p> <p>The proposed new Strategic Core Policy SC10: Creating Healthy Places specifically looks to promote the creation of healthy places which enables children to play safely close to home. It also emphasises the need to protect and improve open space and supports the Healthy Streets principle of promoting well designed and safe places.</p>	CSPRQ052
	3d. Policy SC8, this should have be written by Council, not by Council after a developer's input.	The policy was written by the Council and followed the legislative process of consultation and public examination where it was found to be sound by the Planning Inspector. The review of the policy will be subject to the same scrutiny.	CSPRQ036
	4. HRA Zones of Influence		
	4a. A clear policy should be stated about the significance of the HRA Zones, particularly the 400m and 1200m zones and their impact across district and	Neighbouring authorities are required to take into account any likely significant effects on Bradford's SPA/SAC either alone or in-combination with	CSPRQ097

Appendix 19 - Habitats Regulations Assessment (HRA) - Comments Received and CBMDC Response

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	county boundaries, roads and rivers.	other plans or projects. The policy approach to the buffer zones is currently being reviewed to take into account the latest evidence and any revision will appear in the publication draft of the CSPR.	
Para 4.5	4b. What are the avoidance and mitigation measures to be undertaken to avoid loss of supporting habitats and other effects on the South Pennine Moorlands? When will the council draft a separate Supplementary Planning Document with this strategy as described in 4.5 ?	The Council is currently drafting the South Pennine Moors Recreation Strategy Supplementary Planning Document which will include a mechanism for implementing a package of mitigation measures to avoid or mitigate for increased recreation pressure that would otherwise occur as a result of new growth within the Bradford District. The Council expects to consult on this document later in the year.	CSPRQ110
	4c. What is the extent of the South Pennine Moors Zones of Influence?	A map showing the Zones of Influence can be found in the Core Strategy HRA Report.	CSPRQ110
Page 10 Map	4d. The map on p10 does not show the HRA zones and omits the Nidderdale AONB, which is more extensive than the SPAs. It doesn't show green belt either. There is no intention to include any 'functionally linked land' between the SPA sites which assists the movement of the species we aim to protect.	A more detailed map including the zones will be included in the final version of the CSPR and also in the HRA Report which accompanies the CSPR Preferred Options document. The AONB and Green Belt are not shown as the map was just intended to show the SPA and SAC areas which are subject to HRA regulations. The Council has developed a Local Wildlife Network which is included as a draft designation in the CSPR Preferred Options document and aims to provide links for all wildlife throughout the District and	CSPRQ115

Appendix 19 - Habitats Regulations Assessment (HRA) - Comments Received and CBMDC Response

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		adjoining areas.	
	5. Protection of feed areas		
	5a. I think there should be more emphasis on protecting areas where rare birds feed, not just where they breed. The precautionary principle should be used in such cases, as it is not easy to prove effects on wildlife, before it is too late. I also think that more emphasis and value should be placed on wildlife corridors and river corridors that link ecosystems, and there should be special protection to prevent developments fragmenting those wildlife corridors.	The Council has undertaken a range of rare bird foraging surveys to ensure that development is directed away from any land that the protected birds feed on (known as 'functional land'). In the revised draft Policy EN2a there is also a new designation called Local Wildlife Networks, the purpose of which is to reduce habitat fragmentation and provide links for wildlife throughout the District and surrounding areas.	CSPRQ116
	6. Impact of Events		
Para 2.3	6a. At para 2.3 there is no mention of the impact of cyclists (including night cycling), large events on the moor such as marathon races, noise, litter, keeping the road over Keighley Gate open to all traffic, the moorland edge light pollution from new housing developments or the increased risk of moorland fire due to changes in climate and increased human usage. There is no reference to the cessation of shooting where this has taken place.	Comments noted. All impact pathways will be considered as part of the HRA process and any likely significant effect must be mitigated.	CSPRQ115
	7. Further work - Habitats Management Plan		
	7a. There is no mention of any moorland management	Comments noted. This will be taken into consideration as part of the HRA process but also	CSPRQ115

Appendix 19 - Habitats Regulations Assessment (HRA) - Comments Received and CBMDC Response

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	plans such as the Ilkley Moor Management Plan.	in the development of the South Pennine Moors Recreation Strategy Supplementary Planning Document.	
	7b. The current policy position regarding the HRA which is based on a mitigation approach rather than a restriction of development in specified zones should be retained. Future work should concentrate on preparing and delivering a Habitats Management Plan (as a SPD).	<p>The Habitats Regulation Assessment (HRA) is an iterative process; legislation dictates that this must be undertaken at all stages of plan-making. As the CSPR progresses, Policy SC8 will be amended accordingly, taking into account any recommendations from the new HRA and any recent case law or legislative changes.</p> <p>In accordance with the requirements of Policy SC8, the Council has commissioned consultants to take forward the SPD and associated strategic mitigation strategy. It is hoped that this will be adopted in late summer 2019.</p>	CDPRQ070

Equality Impact Assessment (EqIA) - Comments Received and CBMDC Response			
Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
	1. General Comments		
	1a. Craven District Council has no specific comment to make in this regard.	Noted	CSPR019
	1b. No comments.	Noted.	CSPR003 CSPRQ051 CSPRQ058 CSPRQ089 CSPRQ107
	1c. Inaccessible.	It is not clear what is meant by this statement.	CSPRQ088
	1d. Trendy, but whom is served?	The Equality Impact Assessment (EqIA) assesses the impacts of new or emerging policies on the identified protected characteristics groups identified through the Equality Act 2010 and include the following groups: age, disability, gender reassignment, pregnancy and maternity, race, religion and belief, sex and sexual orientation. Planning policies within the emerging plan should not discriminate against any of the above groups. Where a policy may have an adverse impact on any group of people, the Council must mitigate against these.	CSPRQ034

Equality Impact Assessment (EqIA) - Comments Received and CBMDC Response			
Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
	1e. From what I see there has been little review if the impact on communities to these proposals!	A full Equality Impact Assessment was carried on the adopted Core Strategy as the planning policies emerged. At this stage the Council are scoping which of those adopted policies need to be reviewed and if any new policies are needed. As policies begin to emerge through this review the Council will engage with various groups to assess any potential impacts these policies may have on any groups. If any impacts are identified these should be mitigated against to avoid any negative outcomes of the policy.	CSPRQ083
	2. Review of policies		
	2a. Not fit for purpose - the council consistently discriminate against people with disability - this needs input from disabled people, carers and disability groups across the district	As part of the policy development, the Council will seek to liaise with various protected characteristics groups within the District to undertake a review of the new or amended policies within the Core Strategy Partial Review.	CSPRQ006
	3. Consultation and input from disabled groups		
	3a. There should robust policies in place to help people with affordable housing. Parts of the Bradford district have a very young population who will need help getting them on to the housing ladder. Equally, in areas where there is an increasing older population and those with mobility issues and health concerns must have appropriate housing to meet their needs.	Policy HO11 provides the Council's approach to affordable housing and Policy HO8 sets out the councils strategic policies for the delivery of affordable housing, housing for young families and older people. The Council is in the process of preparing a Housing Design Guide Supplementary Planning	CSPR030

Equality Impact Assessment (EqIA) - Comments Received and CBMDC Response			
Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
		Document (SPD) which will contain detailed policy guidance relating to design, affordability and provision of specialist housing. Once adopted, this will form part of the Local Plan for Bradford and will be used in the decision making stage of planning applications.	
	4. Policies relating to Affordable Housing		
	4a. Consider needs review, regarding provision for persons of impaired mobility and service provision both locally and throughout the district. Has an indirect on social care budget, and council services. If new sites do not provide adaptable provision, onus will fall on the local authority also a cross link with affordable housing.	See comment above.	CSPRQ108
	5. Access to recreation		
	5a. By constantly allowing developments on greenfield and greenbelt land at the periphery of the urban areas, access to open space is being denied disproportionately to the poorer and younger members of society. It is very important to identify the areas that are of recreational value to different groups/cohorts of a community, and ensure that development does not damage/destroy those areas. Special value and protection should be given to areas that provide something special for people of all ages and ethnicities and social status, and contribute to social integration,	<p>Providing an accessible natural and built environment is a key aim of the Core Strategy and this principal runs throughout the plan. The Core Strategy Partial Review proposes to include a new planning policy relating to health and wellbeing which will provide further support to this issue in the future.</p> <p>Furthermore, the Allocations DPD will identify and allocate land for development. As part of that process an Equality Impact Assessment will be</p>	CSPRQ116

Equality Impact Assessment (EqIA) - Comments Received and CBMDC Response			
Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
	exercise and improvement of physical health, and enjoyment and improvement of mental health.	undertaken and these issues will be considered.	
	6. Links to Decision Making process		
	6a. General policy provision should be made in the Core Strategy identifying that the Council will take account of its EqIA duty in determining all planning applications and providing pre application advice. Furthermore that the need to comply with the Council's EQIA will constitute a material consideration in determining planning applications or that there will be a presumption in favour of developments which are required for the council to accord with its EQIA obligations.	The Equality Impact Assessment assesses the likely impacts of the policies which are being prepared. These will be monitored and reviewed throughout the plan period. It is not appropriate to use this EQIA for the determination of planning applications. Equality themes such as accessibility etc are promoted via the Plan and other Local Plan documents which will be a material consideration in the determination of planning applications.	CSPRQ113

Appendix 21 - Health Impact Assessment (HIA) - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
	1. General Comments		
	1a. No particular comments	Noted.	CSPRQ016 CSPRQ051 CSPRQ089 CSPRQ107 CSPR003 CSPR019
	2. General Health and recreation		
	2a. Not addressed at all !!!	It is not clear what is meant by this comment. The new healthy places policy will address health issues.	CSPRQ083
	2b. Leave space for walking and recreation, it's much better to get fresh air than to do all exercise in a gym.	Comment noted. The new proposed healthy places policy looks to prioritise active travel by supporting measures to promote walking and cycling.	CSPRQ094
	2c. I welcome the acknowledgement that the green infrastructure is so beneficial to the health and wellbeing of a population. The JHWS seeks the outcome that "Bradford District is a healthy place to live, learn and work." But what about "Play"...ie leisure. That is the factor I believe contributes greatest to health and wellbeing. I believe the Council needs to identify the areas and facilities that are contributing most to public	Comments noted. With regard to children's play the proposed new healthy places policy incorporates a principle for incorporating children's play close to where they live. Green countryside, wildlife and nature areas are protected within the Core Strategy by the Environment; Green infrastructure; Open space and recreation policies.	CSPRQ116

Appendix 21 - Health Impact Assessment (HIA) - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
	<p>health and wellbeing, and ensure that they are protected and enhanced. Some of the best assets are green countryside areas that are free-of-charge and allow all ages to escape the urban noise and sights of concrete, bricks and tarmac, and be able to enjoy quiet areas of fields, trees, rivers, wildlife and nature. Places where children can play, exercise, and enjoy their childhood away from TVs and mobile phone screens. Such places promote good physical and mental health, help reduce crime and drug-taking, and give children a great start in life. Such places also allow adults to "recharge their batteries", get some exercise, and enjoy themselves, which has a very positive effect on their health and wellbeing. "Gymming and swimming" at a leisure centre is of course of value to a community, but (a) it costs money and so is less available to the poorest in society, and (b) it does not improve mental health as much as relaxing countryside areas can. Beauty spots close to a town/city where grandparents and parents can take their children for picnics/walks, are of particularly high health value.</p>		
	<p>2d. Everyone should do Park Runs and schools should be more active</p>	<p>Comment noted. Provision of park runs and the school curriculum is outside the scope of the Core Strategy. However, the Core Strategy</p>	<p>CSPRQ026</p>

Appendix 21 - Health Impact Assessment (HIA) - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
		protects recreational facilities and green infrastructure. The new proposed healthy place policy supports active design principles.	
	3. Air Quality		
	3a. Transport and Commuting, rise in health issues due to emissions and pollution is not adequately addressed taking into account the latest scientific and technical information.	Comment noted. The new proposed healthy places policy will consider improving air quality	CSPRQ108
	3b. Air pollution and peoples health - request for review of all the recent evidence re health concerns	A new policy on healthy places is being proposed involving input from the Council's Public Health department. One of the principles contained in this policy is related to Air Pollution and has been written after considering a range of health related evidence.	CSPRQ30
	3c. New building with increased traffic, pollution, and damage to the atmosphere must be considered as impacting on health.	Comment noted. The proposed new healthy places policy would mean these issues are considered when new development is proposed.	CSPRQ058
	3d. All development should show how they are going to enhance air quality and protect the health of children.	Comment noted. The proposed new healthy places policy would mean air quality issues are considered when new development is proposed.	CSPRQ052
	3e. improvements in electric charging points in the district a Bypass around Silsden to reduce traffic in the town and improving health of the residents	Comment noted. The new healthy places policy will look to improve the Health of residents in the Bradford District. Improving air quality is part of this policy.	CSPRQ020

Appendix 21 - Health Impact Assessment (HIA) - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues (Separate row for each issue/sub issue.)	Council's Response	Respondent
	4. Transport		
	4a. It is necessary to be more vigilant about the health impact of any new transport or road schemes.	Comment noted. The new Healthy places policy will be applied to new transport or road schemes requiring planning permission.	CSPRQ022
	4b. don't forget sustainable transport	Comment noted. Sustainable transport will be considered in the proposed new healthy places policy. Modal shift to cycling, walking and public transport is encouraged through the transport section in the Core Strategy.	CSPRQ039
	5. Health Infrastructure		
	5a. loss of green space = bad health no increase in provision of and access to health facilities such as doctors	Policies within the Core Strategy protect green space and the new proposed Healthy places policy supports the provision of multifunctional green infrastructure. The accessibility of healthcare infrastructure is also considered in the proposed policy.	CSPRQ090
	6. Other health related issues to be considered		
	6a. Major health concerns about proposed Marley incinerator.	A new Healthy place policy is being proposed in the CSPR and this policy once adopted would be applied to all planning applications.	CSPRQ003
	6b. No mention of training and opportunities for necessary extra health professionals that will be required	This issue is outside the scope of the Core Strategy. Training and opportunities for health professionals, although a necessity, are the	CSPRQ009

Appendix 21 - Health Impact Assessment (HIA) - Comments Received and CBMDC Response

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		responsibility of the Health Authority and not a land related issue.	
	6c. Education required. Nuclear energy is green energy and I expect a micro nuclear power station will be on the horizon soon.	Comment noted.	CSPRQ034
	6d. I know that my answers may not be relevant to the questions but it is my view. To have homeless people, young and old on the streets in 2019 is really absolutely disgusting.	Comment noted. The Core Strategy considers housing need however homelessness requires a multi- agency approach.	CSPRQ063
	6e. No private medical help from large multinational or American companies.	This is outside the scope of the Core Strategy Partial Review.	CSPRQ064

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General		
	1a. No Comments	Noted.	CSPRQ007 CSPRQ107 CSPR003 CSPR019
	1b. Data not seen	No response required.	CSPRQ034
	1c. The Parish Council supports the table regarding the evidence base.	Noted.	CSPR020
	2. Availability of documents for comment		
	2a. The scope of these evidence base documents should be available for comment and clear tight programming of evidence production must be introduced to speed up the plan production process.	Several evidence base studies have been commissioned / are under way. These will be published at the preferred options stage for comment.	CSPRQ070
	3. Timetable		
	3a. An ambitious timetable is set out in the Scoping Report suggesting that the entire evidence base for the Core Strategy and technical reports will be updated to support the Review and preparation of the Site Allocations document. It would be helpful if the Council could indicate the time lines for when the	The technical studies and evidence base are currently in progress which will support policy development. They will be published at the preferred options stage.	CSPR017

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	relevant reports will be available		
	3b. What proportion of each of these sources is made up of estimates, assumptions, conjecture? Which of the people producing these pieces of the evidence base will suffer consequences for poor, negative or damaging outcomes?	The evidence base is produced in a robust manner using tried and tested techniques; this will include some degree of forward projection and assumptions being as this is a necessary part of forward planning. This evidence base will help inform policy making which aims to achieve positive outcomes for Bradford's population.	CSPRQ014
	3c. Residents surveys?!	Comment noted.	CSPRQ088
	3d. I hope you are using external and unbiased agencies for this research work - it's also about time that Bradford Council should be more transparent and speak to the general public directly face to face , where there can be two way dialogue (not public meetings as these are a joke !)	Where a piece of evidence will benefit from particular expertise or a degree of impartiality external consultants will be commissioned to produce it. All of the evidence base which supports plan making will be publically available and will also be scrutinised at public examination. The Council also engage in public consultation through a range of methods and are also happy to discuss any specific queries through the Local Plan email or phone number.	CSPRQ006
	3e. District council was forced to hit targets that were not realistic, government need to let the review be calculated based on their guidelines but common sense should over shadow this to give a truer number on actual need, we should not build housing if there is	The NPPF is clear the council should undertake a local housing need assessment using the standard method for calculating the minimum number of homes needed. The current Core Strategy figure while not out of date was not	CSPRQ055

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	<p>existing housing or even historic buildings that could benefit from being used. By converting disused buildings of historic interest we save the history for the future and enable maintainence in these buildings. It is time for realising the true assets within our district and we need to stop development that threatens these assets within tourist areas additional housing adds stress to the roads and damages the appeal for tourists.</p>	<p>calculated in line with the revised NPPF (2019). Therefore the CSPR will need to be undertaken fully in line with the latest NPPF and latest evidence. The revised housing requirement figure will be evidence based and show the extent to which identified housing need can be met over the plan period. In Policy EN3 the Council encourages heritage-led regeneration initiatives especially in those areas where the historic environment has been identified as being most at risk or where it can help to facilitate the re-use or adaptation of heritage assets.</p>	
	<p>3f. Good. Detail matters. The Council is no doubt under-resourced at present due to government cutbacks. Can individual communities help?</p>	<p>No comment required.</p>	<p>CSPRQ055</p>
	<p>4. Local Infrastructure</p>		
	<p>4a. I can't get to the appendix from here, and having tried and lost my work, i'm not trying again! I have referred earlier to the essential changes to the local planning guidance on fast food/takeaways. Regarding transport issues-Bradford has seen a deterioration in the timetables and quality of bus service and WYCA policies do not sufficiently promote the expansion of bus services. Buses provide the flexibility and the environmental viability for a growing economy.</p>	<p>Our apologies that you were unable to locate the Appendix. The Local Infrastructure Plan is an important document which sits alongside the Local Plan and provides an analysis of infrastructure programmes and potential pressures through development.</p>	<p>CSPRQ019</p>

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

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	4b. don't forget sustainable transport	Noted. This is an integral part to ensuring that all development is sustainable with is an over-arching requirement of the NPPF.	CSPRQ039
	4c. Traffic problems Strain on all infrastructure ie electricity,water,sewers Ammenties ie banks,doctors,local hospitals	Noted. The Local Infrastructure Plan is an important document which sits alongside the Local Plan and provides an analysis of infrastructure programmes and potential pressures through development.	CSPRQ002
	4d. Transport. First buses are filthy inside other operators are clean get First to clean them or sack them.	Not within the remit of planning policy.	CSPRQ029
	4e. To this council, local infrastucture is an irrelevance. You don't care. Build, build, build. That is all.	Council disagrees. The Local Infrastructure Plan provides an analysis of infrastructure programmes and potential pressures through development.	CSPRQ038
	4f. Local Infrastructure in Silsden needs ooking into.	Comment noted.	CSPRQ043
	4g. Open Space assessment - necessary and important. Infrastructure vital. Transport and commuting, visitor and habitats for wildlife all important aspects. Please consider carefully and diligently.	Comment noted.	CSPRQ058
	4h. Low infrastructure and transport are key to future developments. Doctor, schools, nurseries are also. If roads have standing traffic on them for 8 hours a day, what's the point of building a new housing estate? If a	Comment noted.	CSPRQ069

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	local primary school is over establishment numbers, where do any children go to school?		
	5. Play Pitch Strategy		
	5a. Bradford are nearing completion with their Playing Pitch Strategy and this will provide the evidence base for pitch sport in Bradford. It can also be used to calculate any contribution that new development will need to make in order that they address the sporting needs arising from the development.	Noted.	CSPRQ077
	6. Strategic Housing Market Assessment		
	6a. When will the study by arc4Ltd be available for public comment?	The draft SHMA will be made available for comment alongside the Core Strategy Partial Review Preferred Options report.	CSPRQ108
	7. Local Infrastructure Plan		
	7a. The Bradford Infrastructure Plan needs substantial review. It should be tightened to ensure that infrastructure is developed simultaneously with or ahead of development. We are conscious the in SE Bradford, where 6000 new homes are currently proposed, the existing infrastructure is wholly inadequate for the existing residents. We have one of the most polluting and congested roads in the District (the A650). The Council's promises made over 20	Noted. This document will be reviewed alongside the Local Plan.	CSPRQ114

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	<p>years ago to improve this road have never been fulfilled. We have failing schools both at primary and secondary level. We have some of the highest levels of health and social inequalities in the District,. Yet the Infrastructure Plan seems to suggest that further development can safely be commenced ahead of infrastructure improvements. This must be reviewed.</p>		
	<p>8. Landscape Character Areas</p>		
	<p>8a. I believe it is particularly important to review the Green Belt, Open Space and Landscape Character areas. These are of special value to local residents as they contribute to health leisure and wellbeing. Why not consult with the public about which areas are of value to them, and then ensure that those areas get appropriate protection against development? Also, such green areas that warrant protection should be given buffer zones around them, so that the creep of urban development does not spoil the very essence and character of a valued area. In the same way as a modern development built right next to Stone Henge would spoil its landscape setting, so too can greatly loved and valued green spaces and landscape character areas be spoilt by nearby development.</p>	<p>The Council is carrying out a selective review of the Green Belt and this will consider the performance of each parcel of Green Belt land against the purposes of including land within the Green Belt.</p> <p>The Council is also carrying out an Open space Assessment which will audit the current open space provision in the District. This information will be used to identify those sites that should be protected in the Allocations DPD.</p> <p>The Council is still considering the scope of any update to the existing evidence base relating to landscape character. This may take the form of an update to the existing Supplementary Planning Document.</p> <p>These documents will be made available for comment in due course.</p>	<p>CSPRQ116</p>

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	9. Open Space Assessment		
	9a. Open Space Assessment - this should take account detailed work carried out in Neighbourhood Plans across the district.	Comments noted. This document is currently being updated and any evidence produced at a neighbourhood level will be welcome.	CSPR023
	9b. Please leave open space on Idle moor for walking, dog walking and recreation. There's already not a playground on Green lane development sites. And dog walkers need some green space not just a concrete walk every morning and evening.	Comment noted.	CSPRQ094
	9c. I believe it is particularly important to review the Green Belt, Open Space and Landscape Character areas. These are of special value to local residents as they contribute to health leisure and wellbeing. Why not consult with the public about which areas are of value to them, and then ensure that those areas get appropriate protection against development? Also, such green areas that warrant protection should be given buffer zones around them, so that the creep of urban development does not spoil the very essence and character of a valued area. In the same way as a modern development built right next to Stone Henge would spoil its landscape setting, so too can greatly loved and valued green spaces and landscape character areas be spoilt by nearby development.	The Council are currently updating the Green Belt Review and the Open Space Assessment. These reviews will include levels of public consultation in due course.	CSPRQ116

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	10. Green Belt Review		
	<p>10a. I believe it is particularly important to review the Green Belt, Open Space and Landscape Character areas. These are of special value to local residents as they contribute to health leisure and wellbeing. Why not consult with the public about which areas are of value to them, and then ensure that those areas get appropriate protection against development? Also, such green areas that warrant protection should be given buffer zones around them, so that the creep of urban development does not spoil the very essence and character of a valued area. In the same way as a modern development built right next to Stone Henge would spoil its landscape setting, so too can greatly loved and valued green spaces and landscape character areas be spoilt by nearby development.</p>	<p>The Council is carrying out a selective review of the Green Belt and this will consider the performance of each parcel of Green Belt land against the purposes of including land within the Green Belt.</p> <p>The Council is also carrying out an Open space Assessment which will audit the current open space provision in the District. This information will be used to identify those sites that should be protected in the Allocations DPD.</p> <p>The Council is still considering the scope of any update to the existing evidence base relating to landscape character. This may take the form of an update to the existing Supplementary Planning Document.</p> <p>These documents will be made available for comment in due course. These reviews will include levels of public consultation.</p>	CSPRQ116
	<p>10b. Appendix 1 sets out the key elements of the evidence base, which are being updated to support the partial review of the Core Strategy. Within this it states that under the 'Green Belt Selective Review'; "The study will make an assessment of the Green Belt in the Bradford District. It will look at broad parcels of</p>	<p>The scope of the Green Belt selective review has changed since the original methodology was published. Consultants have now been appointed to take this work forward. The methodology has been substantially rewritten but has taken into account the representations received to the</p>	CSPR042

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

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	<p>land and assess how strongly they perform against the five purposes of including land within the Green Belt as set out in the NPPF. The study involves a selective review of Green Belt parcels associated with locations identified for growth within the settlement hierarchy.” We previously provided comments to Green Belt Review Draft Methodology Paper in January 2018, particularly in relation to the sifting process and a consideration of impacts of development on setting of Heritage Assets and it has not been made clear what stage this Review is at and when the Review will be completed nor what feedback has been received and how the Council has responded to the submissions. There needs to be transparency over this matter.</p>	<p>previous consultation. Further opportunity to comment on the revised Green Belt review methodology will be made at the CSPR preferred options stage.</p>	
	<p>11. Other non-Appendix 1 comments</p>		
<p>Page 55</p>	<p>11a. The Council has stated at page 55 of the Partial Review Scoping Report that Policy EN2 “may require some minor changes to be made to the policy”. This is on the basis that “The revised NPPF now places a greater emphasis on plans to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection of priority species. It now also requires plans to identify and pursue opportunities for securing measurable net gains for biodiversity”.</p> <p>We do not agree with this position.</p>	<p>The Council disagrees. Whilst, the principles in relation to conserving and enhancing biodiversity are mainly unchanged. There is now a far greater emphasis on development being made acceptable by providing ecological compensation measures and net gains in biodiversity. This has been supported by the draft revisions to the forthcoming Environment Bill. Policy EN2 has been updated to ensure that this is reflected in Bradford's policy. Changes have also been made to reflect local and regional hierarchy with the reclassification of some sites and the introduction</p>	<p>CSPR020</p>

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	<p>In relation to the NPPF requirement for plans to secure measurable net gains for biodiversity (see paragraph 174(b) NPPF), we note that paragraph E of EN2 already states "Plans, policies and proposals should contribute positively towards the overall enhancement of the District's biodiversity resource" and "they should seek to protect and enhance species of local, national and international importance and to reverse the decline in these species". This existing policy in our view therefore adequately addresses this NPPF requirement.</p> <p>In relation to the NPPF requirement for plans to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species (see paragraph 174(b) NPPF), we note that:</p> <p>1 In relation to ecological networks: paragraph E of EN2 already states that "The Council will seek to promote the creation, expansion and improved management of important habitats within the district and more ecologically connected patchworks of grasslands, woodlands and wetlands..." and "The Council will seek to establish coherent ecological networks that are resilient to current and future pressures". Hence this existing policy in our view adequately addresses this NPPF requirement.</p> <p>2 In relation to priority habitats and species: paragraph E of EN2 already states "They should seek to protect and enhance species of local, national and</p>	<p>of the Local Wildlife Network.</p>	

Appendix 22: Appendix 1 - Comments Received and CBMDC Response

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	international importance and to reverse the decline in these species"; and "The Council will seek to promote the creation, expansion and improved management of important habitats within the district...". Hence this existing policy in our view therefore adequately addresses this NPPF requirement.		

Appendix 23: Evidence Base - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General		
	1a. No comment	Noted.	CSPRQ107
	1b. Seems comprehensive	Noted.	CSPRQ003
Appendix 2 Table 2.1	1c. BCSPR Appendix 2 Table 2.1 Policy P1 the Presumption in favour of sustainable development refers to para 11 of NPPF2018 and states this has not changed yet there are wording and indeed footnotes content to para 11 NPPF2018 which have changed compared to para 14 NPPF2012.	Comment noted.	CSPR016
	2. Equality		
	2a. Equality across the district especially with regard to disability	The Council has undertaken an Equality Impact Assessment (EqIA) of both the adopted Core Strategy policies and the emerging policies as part of the Partial Review. This policy assessment has regard to the potential positive and adverse impacts upon various protected characteristic groups, which includes disability, and seeks mitigate against any negative effects of those policies.	CSPRQ006
	3. Population Data		
	3a. As mentioned above the latest ONS population and household estimates and projections for 2016	The updated Strategic Housing Market Assessment (SHMA) will be primary evidence	CSPRQ051

Appendix 23: Evidence Base - Comments Received and CBMDC Response

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	should be regarded as a key part of the monitoring and planning process. Although the 2014 projections may be preferred by government the 2016 projections demonstrate that the 2014 figures are well above the evidence provided by the latest trends. And this conclusion ought to be very relevant to determining that there is no need for an uplift to the ONS 2014 household projections.	base underpinning the housing need and requirement taken forward in the revised Core Strategy. The Employment Needs Assessment and Land review (ENALR) will feed into this evidence base as a key source material on any potential economic uplift to the baseline figure.	
	4. Local and Resident Surveys		
	4a. Residents surveys.	Noted.	CSPRQ088
	4b. Notice should be taken of local surveys done by Town & Parish Councils	Noted.	CSPRQ015
	5. Housing – Empty homes		
	5a. Amount of unoccupied properties Amount of brownfield sites	Noted. The Standard Methodology allow Council to take account of unoccupied / empty when calculating their housing requirement, and this will be considered as part of the work underpinning the revised Housing Policies of the Core Strategy. Previously developed land will be prioritised for housing development, where it is consider viable and deliverable.	CSPRQ071
	5b. You have a document that outlines how you will reduce the number of empty / sub standard houses	Noted. The Standard Methodology allow Council to take account of unoccupied / empty when	CSPRQ037

Appendix 23: Evidence Base - Comments Received and CBMDC Response

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	you have . Please include and update ytjis as belive it could really support your housing challenges in a more sustainable way	calculating their housing requirement, and this will be considered as part of the work underpinning the revised Housing Policies of the Core Strategy.	
	6. Air Pollution		
	6a. In the light of the increased evidence since the adopotion of the Core Strategy of environmental pollution from particulates generated mainly by highway traffic, Policy HO7 G should be reviewed with a view to adding in the pre-ambble reference to "air-pollution"	Air quality is a key consideration within the Core Strategy and is covered within the policies of the Transport and Movements, and Environment Chapters.	CSPRQ114
	7. Transport		
	7a. We would request that updating transport evidence could include undertaking transport modelling around Steeton and Silsden whilst also considering transport impacts and modelling around Glusburn, Crosshills and Sutton in Craven district. We would be pleased to engage further on this matter as part of Duty to Cooperate discussions.	The policy framework of the revised Core Strategy and the proposed site within the Site Allocations will be appraised using the Bradford Strategic Transport Model, which is currently in the process of being produced.	CSPR019
	7b. don't forget sustainable transport	Sustainable transport is a key consideration throughout the planning process of the Core Strategy, and is covered in detail within the Transport and Movement Chapter.	CSPRQ039
	7c. In Keighley, traffic queues on East Parade are	The revised Policies of the Core Strategy will	CSPRQ069

Appendix 23: Evidence Base - Comments Received and CBMDC Response

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	<p>awful most times of day. The overall pattern of traffic flow for Keighley still needs looking at. For Bradford, the whole side of the city from Thornton Road, Ingleby Road, Cemetery Road - in fact all roads that take you from Morrison's on Thornton Road up to St Luke's Hospital - are always, 24 hours a day, standing traffic! The air pollution in these areas must be astronomical. Can Bradford Council please bite the bullet and set up a proper ring road for the city - something that should have been done more than 40 years ago!</p>	<p>consider key strategic transport interventions across the District to facilitate the Council's growth aspirations. The Core Strategy will also establish a planning framework to ensure all new developments do not have a detrimental impact upon the transport network, but instead provide benefits in form of financial contributions or direct delivery.</p>	
	<p>8. Infrastructure</p>		
	<p>8a. Regarding infrastructure: There needs to be something that recognises the need for integration - new housing and employment places a demand on many aspects of infrastructure all of which need to be in place in time i.e. At or before the point of housing occupation or employment start date. Some infrastructure provision has a very long lead-time e.g. Sewerage capacity, provision of hospital capacity. This kind of co-ordination with agencies which are not under the council's control needs a high priority and consideration early in the lifecycle of a plan if it is not to wreck otherwise perfectly reasonable developments.</p>	<p>The Infrastructure Delivery Plan is currently in the process of being updated and will consider the impact of development growth upon all aspects of the infrastructure network.</p>	<p>CSPRQ041</p>

Appendix 23: Evidence Base - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	9. Environment		
	9a. The evidence bas should include how we want to enhance current and future major green spaces and how that will mitigate climate change.	The Council is currently in the process of updating the Open Space Assessment, which will put forward recommendations of how existing open spaces can be enhanced and any future needs resulting from development growth aspirations.	CSPRQ052
	9b. Landscape Character SPG	Noted.	CSPR023
	9c. Flood Risk Documentation and Modelling Local Emmission Strategy Open space assessment	Noted.	CSPRQ108
	9d. Identify areas where the public go to escape "urban concrete", and where they can exercise, enjoy watching wildlife, and experience habitats that contribute to their health and wellbeing, even if the wildlife and habitats are not necessarily rare and may be relatively unprotected (ie not protected by special schemes). Otters and dippers are good cases in point: development is often allowed very close to where those species live on a beck or river, but then the animals quickly move through, and it is harder for the public to observe them acting naturally in a pleasant natural environment. The species may not necessarily have been seriously damaged, but the public's enjoyment and appreciation of them has.	<p>The Council is currently in the process of updating the Open Space Assessment, which will put forward recommendations of how existing open spaces can be enhanced and any future needs resulting from development growth aspirations.</p> <p>Ecological enhancements are covered within the Policies of the Environment Chapter and support evidence bases.</p>	CSPRQ116

Appendix 23: Evidence Base - Comments Received and CBMDC Response

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	10. Development Management		
	<p>10a. When extending a home I think the 1m rule, (building to come in 1m from boundary and 1 m back from the front of existing building needs looking at and should be judged on their own merits. I agree there should be a metre between dwellings, but For instance where two property's are separated by a driveways and they both want to put a side extension on. I don't think they should both come in a metre from boundary thus making a 2m gap between dwellings. I think they should come 0.5m from boundary thus making 1 m gap between dwellings. My reasons for this are to make it more viable to extend and on new housing developments the houses aren't always built 2 m apart so why should it be different?</p>	<p>The Council adopted the Householder SPD in 2012. At the present time, the Council is not considering any updating this guidance at the present time.</p>	<p>CSPRQ042</p>
	11. Proposed new policies		
	<p>11a. The following topics have been highlighted as possible new policy areas for further consideration:</p> <ul style="list-style-type: none"> • Specialist housing • Self and Custom Build • Combined infrastructure priorities • Green Infrastructure – further details • Healthy places 	<p>Comments noted</p>	<p>CSPR002</p>

Appendix 23: Evidence Base - Comments Received and CBMDC Response

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	At this stage no detail is provided as to the content of these policies, however, the HBF would recommend that appropriate evidence is collated to ensure these policies are robust and sound.		

Appendix 24: Any Other Core Strategy Policies to be Reviewed in Full? - Comments Received and CBMDC Response

Section / Para. / Policy Ref. / Settlement /	Issue and Sub-Issues	Council's Response	Respondent
	1. General		
	1a. No comment	Noted.	CSPRQ051 CSPRQ070 CSPR019
	1b. Not at present.	Noted.	CSPRQ022 CSPRQ008 CSPRQ089 CSPRQ107
	1c. You've got enough identified. It's better to focus on the core requirements than try to fix everything	Noted	CSPRQ007
	1d. All core strategies require full review	Noted. At this stage the Council is reviewing all relevant policies as deemed necessary as a result of updated national planning policies and guidance.	CSPRQ031
	1e. Not yet reviewed.		CSPRQ067
	1f. I don't understand.		CSPRQ064
	1g. A full review of the postal vote system	Not relevant to the Local Plan consultation.	CSPRQ033
	1h. Fullness of time will ensure true reviews.		CSPRQ034

Appendix 24: Any Other Core Strategy Policies to be Reviewed in Full? - Comments Received and CBMDC Response

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	2. Impact of the Core Strategy Review		
	2a. A statement should be provided detailing the impact of strategies being reviewed on al those which are not being reviewed.	Noted.	CSPRQ097
	3. Policy SC2 – Climate Change & Resource Use		
	3a. It is surprising that no change is envisaged for SC2 Climate Change and Resource Use, since the targets for reducing carbon emissions recommended by the IPCC in its SR15 Report in October 2018 are substantially more ambitious than the Council is currently working with. The current versions of SC2 and of Thematic Policies 5.2 and 5.4 contain many aspirations, but little detailed planning. The IPCC have argued that time is running out and urgent action is needed. We strongly urge the Council to provide more specific planning detail. This is urgently needed in relation to energy (identifying suitable areas and opportunities for low carbon and renewable energy (EN6)); household heating: the National Grid Future Emission Scenarios states that "Action on heat is essential and needs to gather pace in the 2020s to meet carbon reduction targets". What plans does the Council have to develop a rational, district wide policy in this area? Two major potential heat sources are heat pumps and hydrogen.A project aimed at developing a hydrogen distribution system (H21) is	Noted. At this stage the Council is reviewing all relevant policies as deemed necessary as a result of updated national planning policies and government guidance. Policy SC2 is considered to give sufficient flexibility to provide a clearer link to the District's Climate Change Framework and incorporates a focus upon green infrastructure etc. Amendment could however be made to reflect up to date evidence base.	CSPRQ106

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	<p>underway in Leeds. Does the Council aim to interact with this project? Related issues are discussed in the Sustainability Appraisal.</p>		
	<p>3b. Climate change - We note that there is currently no mention of climate change in the scoping report, which gives us great concern. All local authorities are legally obliged to address climate change in their policies and programmes under the Climate Change Act 2008. The recent TCPA & RTPI document Planning for Climate Change (2018) (para 2.2.1) explains the legal situation.</p> <p>Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change. This powerful outcome-focused duty on local planning clearly signals the priority to be given to climate change in plan-making. In discharging this duty, local authorities should consider paragraph 94 of the NPPF and ensure that policies and decisions are in line with the objectives and provisions of the Climate Change Act 2008 (Section 1) (discussed below) and support the National Adaptation Programme. For the sake of clarity, this means that local plans should be able to demonstrate how policy contributes to the Climate Change Act target regime, and this, in turn, means understanding both the</p>	<p>Noted. At this stage the Council is reviewing all relevant policies as deemed necessary as a result of updated national planning policies and government guidance. The Council considers that it has adhered to addressing climate change and appropriately contributed to the mitigation of and adaptation to this challenge through its Local Plan policies as required by the NPPF and other guidance. Amendment could however be made to reflect up to date evidence base.</p>	<p>CSPR024</p>

Appendix 24: Any Other Core Strategy Policies to be Reviewed in Full? - Comments Received and CBMDC Response

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	<p>baseline carbon dioxide emissions and then the actions needed to reduce emissions over time – which, in turn, means that annual monitoring reports should contain ongoing assessments of carbon performance against the Climate Change Act target.</p> <p>'The Section 19 duty is much more powerful in decision-making than the status of the NPPF, which is guidance, not statute. Where local plan-policy which complies with the duty is challenged by objectors or a planning inspector on the grounds, for example, of viability, they must make clear how the plan would comply with the duty if the policy were to be removed. Whatever new policy may emerge, compliance with the legal duty on mitigation must logically mean compliance with the provisions of the target regime of the Climate Change Act.'</p> <p>It is our position that a Plan which does not contain an overall carbon reduction target, and does not show how the net effect of the Plan policies taken as a whole will deliver that target, cannot be considered to be legally compliant.</p>		
	<p>3c. SC2 -Climate change and Resource Use, reasoning - in light of latest evidence and to adopt a pro-active rather than re-active approach to this serious issue (for reference; http://www.gov.uk/government/speeches/i-dont-want-you-to-panic)</p>	<p>Policy SC2 is considered to give sufficient flexibility to provide a clearer link to the District's Climate Change Framework and incorporates a focus upon green infrastructure etc. Amendment could however be made to reflect up to date evidence base.</p>	<p>CSPRQ108</p>

Appendix 24: Any Other Core Strategy Policies to be Reviewed in Full? - Comments Received and CBMDC Response

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	3d. SC2 - we believe that the publication of the IPCC October 2018 report and the response of the Committee on Climate Change indicate a need to review this Core Strategy policy, particularly in terms of building design and energy (especially heating and transport), air quality (given that Bradford was cited in the review) and waste. Strengthening of this policy would therefore seem to be justified.	Policy SC2 is considered to give sufficient flexibility to provide a clearer link to the District's Climate Change Framework and incorporates a focus upon green infrastructure etc. Amendment could however be made to reflect up to date evidence base.	CSPRQ115
	3e. SC2 Climate Change and resource use as this is this biggest challenge facing our world . We ignore the recent environmental surveys on insect decline and larger species decline at our peril.	Noted. Amendment to Policy SC2 could be made to reflect up to date evidence base.	CSPR039
	4. Policy SC4 – Hierarchy of Settlements		
	4a. Yes, Policy SC4. The settlement hierarchy should be reviewed. Villages such as Burley in Wharfedale have been scheduled as Local Growth Centres when they are clearly located far from proposed employment sites. Development here will increase pressures on the already overloaded transport infrastructure. The requirement that only 15% of development of in Local Growth Centres should be on PDL will lead to extensive and unjustifiable Greenbelt release	Noted. At this stage the Council is reviewing all relevant policies as deemed necessary as a result of updated national planning policies and guidance.	CSPRQ074
	4b. Reasoning - in light of latest evidence and to adopt a pro-active rather than re-active approach to this serious issue (for reference;	Noted. At this stage the Council is reviewing all relevant policies as deemed necessary as a result of updated national planning policies and	CSPRQ108

Appendix 24: Any Other Core Strategy Policies to be Reviewed in Full? - Comments Received and CBMDC Response

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	http://www.gov.uk/government/speeches/i-dont-want-you-to-panic)	guidance.	
	5. Policy SC4 - Hierarchy of Settlements		
	5a. If the housing targets are revised and the new evidence shows that the type of housing needed differs from that proposed in the previous iterations of the Local Plan/Development Plan Policies SC4 and SC5 would need to be revised and possibly substantially altered. It makes no sense to disperse housing and expand commuter settlements that impact on greenfields and greenbelt etc if housing need can be accommodated on urban brownfield sites.	Noted. The council intends to review Policy SC4 (as relevant) in line with national planning policy requirements, government advice and the latest housing and economic evidence.	CSPRQ111
	5b. Reasoning Local Growth Centre Silsden is not sustainable without considerable infrastructure investment AND improvement NOW before any further housing development.	Noted.	CSPRQ108
	6. Policy SC5 - Location of development		
	6a. Reasoning relevance to infrastructure provision	Noted.	CSPRQ108
	6b. If the housing targets are revised and the new evidence shows that the type of housing needed differs from that proposed in the previous iterations of the Local Plan/Development Plan Policies SC4 and SC5 would need to be revised and possibly	Noted. The council intends to review Policy SC4 (as relevant) in line with national planning policy requirements, government advice and the latest housing and economic evidence.	CSPRQ111

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	substantially altered. It makes no sense to disperse housing and expand commuter settlements that impact on greenfields and greenbelt etc if housing need can be accommodated on urban brownfield sites		
	7. Policy SC8 - Protecting the South Pennine Moors and their zone of influence		
	<p>7a. The current adopted core strategy refers to the old version of the NPPF and must be updated in order to bring the document in line with current national policy. We would encourage a review of the zone of influence. Zone A currently discourages any development involving an increase in dwellings within 400m of the site unless it would not have an adverse effect on the integrity of the SPA or the SAC. The South Penning Moors SAC/SSSI is designated for the presence of highly sensitive and irreplaceable habitats, including blanket bog and as an SPA for the bird assemblages present.</p> <p>The current adopted strategy recognised the impacts of urban edge effects and the requirement to protect the site. However, we would encourage further consideration to be made of the size of the buffers implemented. In accordance with NE 'zone of influence' guidance for SSSI's (see MAGIC) the LPA should consult NE to assess likely significant risks for most developments, including residential development (50 or more), within 2km of the SSSI boundary. As this is the requirements for a nationally designated site, we</p>	Noted. The council intends to amend/update Policy SC8 based on any new or up to date evidence base.	CSPR026

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	<p>feel the implications of the international designations would result in the requirement of a much large buffer. Furthermore, in accordance with Habitat Regulations, further consideration of the requirement for a HRA must be made to assess the likely significant effects of the development on the SAC/SPA.</p> <p>Due to the sensitivity of the habitats and species present, including to disturbance (through visitor pressure and domestic animals), pollution and hydrological impacts etc. we consider the 400m of Zone A to be extremely minimal and would encourage further consideration of widening of this buffer to at least 1km.</p> <p>We would also encourage the consideration of the implementation of strategy and policy to mitigate the recreational and air quality impacts on the SAC/SPA site.</p>		
	7b. Most people do not regard Bradford as being in the South Pennines, that's Derbyshire.	Noted.	CSPRQ080
	7c. If the housing targets are revised and the new evidence shows that the type of housing needed differs from that proposed in the previous iterations of the Local Plan/Development Plan Policies SC4 and SC5 would need to be revised and possibly substantially altered. It makes no sense to disperse housing and expand commuter settlements that impact on greenfields and greenbelt etc if housing need can	Noted. At this stage the Council is reviewing all relevant policies as deemed necessary as a result of updated national planning policies and guidance.	CSPRQ111

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	be accommodated on urban brownfield sites. Likewise policy SC8 (Protecting the South Pennine Moors) should be revised to reflect changes in housing target as it is better to avoid impacting on a SPA by diverting development elsewhere than mitigate it after unnecessarily locating development close to it.		
	8. Policy AD2 - Investment Priorities for Airedale		
	8a. Reasoning - in light of latest evidence and to adopt a pro-active rather than re-active approach to this serious issue (for reference; http://www.gov.uk/government/speeches/i-dont-want-you-to-panic)	Noted.	CSPRQ108
	9. Policy PN1 - South Pennine Towns and Villages		
	9a. In amending this policy would ask the Council to consider and give specific weighting to the effects of land development in these areas, which include their economy, tourism, landscape, habitat and areas of outstanding natural beauty. As with green belt, once such land is developed it cannot be undone, irrevocable changing the unique character of both the landscape and the economy.	Noted.	CSPR020
	10. HO1 – The Districts Housing Requirement		
	10a. No, the need for the housing requirement to be	The council will review the adopted Core Strategy	CSPRQ051

Appendix 24: Any Other Core Strategy Policies to be Reviewed in Full? - Comments Received and CBMDC Response

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	updated is the crucial issue, along with a need to avoid allocating Green Belt for housing based on out-of-date information.	housing requirement in line with national planning policy requirements and the latest housing and economic evidence.	
	11. Policy HO2 – Strategic Sources of Supply		
	11a. Policy HO2 is not identified for major review, but sources of supply will have materially changed since 2013.	Noted. The council intends to review the adopted Core Strategy housing policies (as relevant) in line with national planning policy requirements, government advice and the latest housing and economic evidence.	CSPR029
	11b. In the context of the decision having been reached to undertake a partial review of the Core Strategy, it is considered that a failure to include a review of Policy Ho2 relating to the strategic sources of housing supply, represents a significant missed opportunity to identify additional strategic sources of supply which would play an important role in meeting the District's housing needs set by Policy Ho1. It should be recognised that based on the assessment of land supply contained in SHLAA 2nd update, the Council is only able to demonstrate a 2.3-year supply of housing against its 5-year supply requirement. As Table 1 at Section 2 of these representations demonstrates, there has continued to be a consistent under delivery of housing since then. The ability to rectify the absence of a 5-year supply of deliverable housing sites is clearly compromised by	Noted. The council intends to review the adopted Core Strategy housing policies (as relevant) in line with national planning policy requirements, government advice and the latest housing and economic evidence.	CSPR021

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	<p>the absence of progress on the Land Allocations Plan, a matter compounded by the fact that this plan has been subject to continual delays and is now being delayed further than the dates indicated in the Local Development Scheme 2018 – 2021 (July 2018) and that the progression of the Land Allocations Plan will no longer run concurrently with the Core Strategy Partial Review. The delay in bringing forward the Land Allocations Plan will also mean that the largest allocations, which by their very nature are more complex and have a longer lead in period, are not likely to deliver housing and the associated benefits until well into the new plan period, and there is therefore a very real risk that a number of such sites would potentially not deliver the extent of housing in the plan period that they otherwise may be capable of. We therefore consider that a practical solution to this issue is for a revised Policy Ho2 (or indeed a series of new policies sitting alongside Policy Ho2) to identify a number of a number of strategic allocations. These would be limited to a small number of the largest areas or sites (circa 500 units and upwards), capable of delivering new large numbers of new housing and associated infrastructure and which are strategically important to the delivery of the wider housing requirement and spatial strategy across the District and the constituent sub-areas. Such an approach is not uncommon in Development Plan Documents dealing with strategic matters in advance of a District-</p>		

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	<p>wide allocation plan considering sites of all sizes. Indeed, it is noted that Policy HO2 in the adopted Core Strategy already goes as far as identifying specific sites and locations, such as the proposed Holme Wood Urban Extension.</p> <p>In the context of the Partial Review continuing to identify exceptional circumstances to amend the Green Belt boundaries, and for this to be reflected in an updated Policy SC7 (upon which we comment on below), it would be entirely appropriate (subject to the usual tests) for the strategic allocations to include sites presently in the Green Belt, particularly where the evidence base or wider consideration of boundaries has concluded that the site could be removed from the Green Belt without harm its overall strategic function or defined purposes. This is likely to be more relevant in settlements already identified in the Core Strategy for growth.</p> <p>By identifying these large, complex and strategically important allocations at this early stage it will maximise the potential for these to be delivering new homes, infrastructure and associated benefits during the plan period.</p> <p>In this context it is considered that for the following reasons the CEG site to the west of Burley-in-Wharfedale should be identified as a strategic allocation in the revised Core Strategy:</p> <ul style="list-style-type: none"> • It is a large site capable of accommodating 500 		

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	<p>homes as well as a wider community infrastructure including a new, much needed primary school to address existing capacity issues in the area;</p> <ul style="list-style-type: none"> • Burley-in-Wharfedale is identified as a Local Growth Centre; • The Bradford Growth Assessment undertaken to underpin the adopted Core Strategy concludes that the land to the west of Burley-in-Wharfedale is an appropriate location for land to be removed from the Green Belt to accommodate growth. A separate Green Belt Assessment of Burley-in-Wharfedale, the conclusions of which have been agreed by the Council, also concludes that the settlement has robust and defensible boundaries on three sides (bound to the north and east by the A65 and to the south by the railway line) and that land could be removed from the Green Belt along its western boundary without impinging on its purposes. Furthermore, the development of this site provides the opportunity for creating a new defensible western boundary to the settlement; • In resolving to approve the planning application for 500 homes, a school and wider community infrastructure (ref 16/07870/MAO), the Council has already concluded that it is suitable and is not burdened by any technical constraints preventing the site being delivered. The Council's position at the forthcoming call-in inquiry into the planning application is to support the proposed development. 		

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	12. Policy TR1 - Travel Reduction and Modal shift		
	12a. Reasoning updated information and need to reduce commuting	Noted.	CSPRQ108
	13. Policy EN1 - Protection and improvement in provision of Open Space and Recreation Facilities		
	13a. Generally we are very encouraged by the inclusion of the environmental policies, including those for open space and green infrastructure. However, we feel further clarity could be achieved by ensuring the policies contribute towards Biodiversity 2020 and the 25 Year Environment Plan by contributing further towards nature recovery networks both across the district and locally.	Noted.	CSPR026
	14. Policy EN2 - Biodiversity and Geodiversity		
	14a. We are encouraged to see the inclusion of detail for varying habitats and their importance to the local area and biodiversity nationwide. However, in order to bring the policy and the core strategy up to date with the revised NPPF, further clarity is needed on the definition of 'enhancement'. In accordance with the revised NPPF (170d, 174), net gain in biodiversity is now expected for all developments. Whilst this should be achieved for all sites, including designated sites (both national and local), the mitigation hierarchy (avoid, minimise,	Noted. The council intends to review the Policy EN2 (as relevant) in line with national planning policy requirements, government advice and the latest evidence base.	CSPR026

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	<p>mitigate) should first be followed before seeking net gain on the site.</p> <p><i>'170. Planning policies and decisions should contribute to and enhance the natural and local environment by:</i></p> <p><i>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;'</i></p> <p><i>'174. To protect and enhance biodiversity and geodiversity, plans should:</i></p> <p><i>a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and</i></p> <p><i>b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'</i></p> <p>Whilst we would strongly encourage the incorporation of Biodiversity Offsetting metrics for all developments to ensure a net gain in biodiversity on site and would highly regard DEFRA metrics to be utilised, the limitations of these metrics must be realised. Due to the intrinsic value of most designated sites and priority</p>		

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	<p>habitats (such as ancient woodland, veteran trees and blanket bog considered to be 'irreplaceable' by NPPF) application of the metric is not always appropriate and these cases must be considered on an individual basis.</p> <p>We would strongly encourage the implementation of a requirement for net gain from all developments as per NPPF, as these have been voluntarily adopted, and proven to work efficiently, by other local councils including Lichfield (who adopt a 20% net gain protocol for all development and have averaged 59.3% net gain over the last two years) and East Hertfordshire. As per the recent DEFRA consultation, we would recommend a minimum of 10% net gain to be achieved.</p> <p>Excerpts from East Hertfordshire Local Plan: <i>'20.2.10 In order to objectively assess net ecological impacts and therefore achieve net gains in biodiversity, as required by NPPF, it is vital that a fair, robust mechanism for measuring these impacts is applied. To ensure they are consistently quantified, the application of the DEFRA and NE endorsed Biodiversity Impact Assessment Calculator (Warwickshire County Council v18 2014 or as updated) will be required for all development with negative impacts on biodiversity. Proposals will be expected to show a net gain in ecological units following development.</i></p> <p><i>20.2.11 It is important that a consistent, acceptable standard of supporting ecological information is</i></p>		

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	<p><i>supplied with planning applications. In order to ensure this, it will be expected that ecological information is presented in accordance with the British Standard on Planning and Biodiversity – BS42020 2013 Biodiversity – Code of practice for planning and development.</i></p> <p><i>Policy NE1 International, National and Locally Designated Nature Conservation Sites</i> <i>IV. Ecological impacts will be quantified by utilising the Biodiversity Impact Assessment Calculator (BIAC). Development must demonstrate a net gain in ecological units. Ecological information must be supplied in accordance with BS 42020 2013.</i></p> <p><i>Policy NE2 Sites of Nature Conservation Interest (Non-Designated)</i> <i>I. All proposals should achieve a net gain in biodiversity, as measured by using the BIAC, and avoid harm to, or the loss of features that contribute to the local and wider ecological network.</i> <i>II. Proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation, and integrate ecologically beneficial planting and landscaping into the overall design.'</i></p> <p>The implementation of long term environmental management plans would also be encouraged.</p>		

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	<p>14b. Biodiversity - We support and acknowledge that biodiversity policies need to identify and pursue opportunities to secure biodiversity 'net gains'. This is in line with the '25 year plan' we would support a link to this document in the development of the partial review.</p> <p>We would encourage policy wording that aims to achieve the opening up of culverts, improvement/naturalisation/creation of new watercourses, and the provision of other environmental infrastructure that would provide wider biodiversity benefits and help deliver Water Framework Directive (WFD) improvements.</p> <p>We are in support of the development of new policies such as the development of a green infrastructure policy. We would be happy to enter discussions to agree what service or technical advice we can offer on the development of such policies as and when this is needed.</p>	<p>Noted. The council intends to review the Policy EN2 (as relevant) in line with national planning policy requirements and the latest evidence base.</p>	<p>CSPR031</p>
	<p>15. Policy EN4 – Landscape</p>		
	<p>15a. Landscape (EN4) is very important. The Council has identified areas of special landscape character, such as the Worth and North Beck Valley. Policy should be tightened so that developments even adjacent to such areas would not be allowed if they would be detrimental to the landscape character.</p>	<p>Noted.</p>	<p>CSPRQ116</p>

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	15b. There are mention of several policies in this section which need updating such as EN4. When will this be done?	The next stage, the Preferred Options document, will be published for public consultation later this year.	CSPRQ110
	16. Policy EN5: Trees and Woodland		
	16a. There are mention of several policies in this section which need updating such as EN5. When will this be done?	The next stage, the Preferred Options document, will be published for public consultation later this year.	CSPRQ110
	16b. We are encouraged to see that ancient woodland and veteran trees are included within the policy and recognised as irreplaceable habitat. However, we would request an amendment that Plantation Ancient Woodlands (PAWs) are also included in this description (B). PAWs are of equal value as Ancient Semi-Natural Woodlands, as recognised in National Planning Practice Guidance and Standing Advice on Ancient Woodland and Ancient and Veteran Trees.	Noted. The council intends to review this Policy (as relevant) in line with national planning policy requirements, government advice and the latest evidence base.	CSPR026
	17. Policy EN7		
	17a. There are mention of several policies in this section which need updating such as EN7. When will this be done?	The council intends to review the Policy (as relevant) in line with national planning policy requirements, government advice and the latest evidence base.	CSPRQ110

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	18. Policy EN8: Environmental Protection -		
	<p>18a. We are happy to have this policy included within the core strategy and are encouraged to see the consideration for air quality and water in the Bradford area. However, we feel this could be enhanced to encourage the use of habitat creation as a form of mitigating, for example, the impacts of emissions in the local area with an aim to contribute towards the 2050 Climate Change targets.</p> <p>We would also encourage the exploitation of ecosystem services in order, for example, to improve water and air quality and prevent flood risk. This can be through achieving net gain in biodiversity and consideration of SUD's and green infrastructure design.</p> <p>We would like to see further inclusion of consideration for the impacts of nitrification on local habitats, in particular locally and nationally designated sites, with encouragement to mitigate these effects.</p> <p>Nitrogen deposition is a major issue for urban or suburban nature conservation sites, as the increased nitrogen enriches the soil and leads to botanical changes, which leads to species such as nettles and brambles outcompeting other plant species. The impacts of nitrification are often experienced and visible before the site meets its critical load with long term studies nationally showing how the increase in abundance of nettles and brambles from nitrogen</p>	<p>Noted. The council intends to review this Policy (as relevant) in line with national planning policy requirements, government advice and the latest evidence base.</p>	<p>CSPR026</p>

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	deposition is significant. Once impacts have occurred there are few ways to ameliorate this, hence we would encourage the implementation of carbon capture enhancements within all developments through those methods outlined above and the implementation of green infrastructure.		
	18b. We would also like to suggest you may wish to develop a new policy that tackles water resources, perhaps beyond that of existing policy EN8, D. Such a policy could look at future implications of drought or water shortages etc. and to also push for water framework directive (WFD) to be covered in more detail within policy. We have previously assisted other local authorities in Yorkshire to develop such policies, for example; Barnsley Policy CC5 Water Resource Management. Kirklees Policy PLP 34 Conserving and enhancing the water environment [links included in document]	Noted. The council intends to review this Policy (as relevant) in line with national planning policy requirements, government advice and the latest evidence base.	CSPR031
	19. Policy ID7		
	19a. There should be an improvement for the public to access the consultation. Better advance notice and not so much dependence on I.T.	Noted.	CSPRQ080

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	20. Other Policy Issues Raised		
	20a. All of them...Bradford is to full in all aspects. ...roads ...rail...buses...gas...water...dentists. ...schools. ..doctors....hospitals and on and on	Noted. Matters relevant to this comment are not directly relevant to current consultation or have been responded to adequately in other part of the reps analysis.	CSPRQ084
	20b. better illumination and discrete security cameras widely used.	Noted. Matters relevant to this comment are not directly relevant to current consultation or have been responded to adequately in other part of the reps analysis.	CSPRQ004
	20c. Schools and siting of them.	Noted	CSPRQ021
	20d. Ensure there is enough school places and leisure facilities as the growth happens	Noted	CSPRQ030
	20e. don't forget sustainable transport	Noted	CSPRQ039
	20f. Greenbelt land should be reserved and not used.	Noted	CSPRQ096

