

Local Development Framework for Bradford

# Planning for Crime Prevention

## Supplementary Planning Document

### Supporting Documents

*Statement of Consultation*

*Statement of Sustainability Appraisal*

October 2008



City of Bradford MDC

[www.bradford.gov.uk](http://www.bradford.gov.uk)



This document is one of a number that make up the Local Development Framework for the Bradford District. If you need the contents of this document to be interpreted or translated into one of the community languages or you require it in Braille, Large Print or on tape, please contact the Local Development Framework Group on (01274) 434050, (01274) 434544 or (01274) 434606.

આ દસ્તાવેજ ઘણાંમાં નો એક છે કે જે બ્રેડફોર્ડ ડિસ્ટ્રિક્ટ નાં સ્થાનિક વિકાસ ની રૂપરેખા બનાવે છે. જો તમને આ દસ્તાવેજનાં લખાણનું પ્રાદેશિક ભાષાઓમાં ભાષંતર કરાવવાની અથવા તેનો અર્થ સમજવાની જરૂર જણાય, અથવા તમને તેની જરૂર બ્રેઇલ, લાર્જ પ્રિન્ટ કે પછી ટેપ ઉપર હોય, તો મહેરબાની કરી લોકલ ડિવેલપમેન્ટ ફ્રેમવર્ક ગ્રુપનો (01274) 434050, (01274) 434544 અથવા (01274) 434606 પર સંપર્ક કરો.

यह दस्तावेज़ उन बहुत से दस्तावेज़ों में से एक है जिनसे मिलकर ब्रैडफोर्ड डिस्ट्रिक्ट का लोकल डिवेलपमेंट फ्रेमवर्क बनता है। यदि आप इस दस्तावेज़ की जानकारी का हिन्दी अनुवाद या इसे ब्रेल, बड़े अक्षरों या टेप पर प्राप्त करना चाहते हैं , तो कृपया लोकल डिवेलपमेंट फ्रेमवर्क ग्रुप से (01274) 434050, (01274) 434544 या (01274) 434606 पर सम्पर्क करें।

બ્રાડફોર્ડ ડિસ્ટ્રિક્ટ (Bradford District) એર લોકાલ ડેવેલોપમેન્ટ ફ્રેમવર્ક (Local Development Framework – સ્થાનીય ઉন্নયન કાર્થામો) એર અનેકગુલો કાગજપત્ર વાં દલિલપત્રેર એકટિ હલો એઈ તથ્યપત્રટિ । એઈ તથ્યપત્રેર વિષયવસ્તુ કમિઉનિટિર લોકદેર કોનો ભાષાય રુવાતે ચાઈલે અથવા લિખિત અનુવાદ ચાઈલે નતુવા તા બ્રેઈલે (અક્ષલિપિતે), મોટા હરફે કિંવા ક્યાસેટે રેકર્ડ કરે ચાઈલે, અનુગ્રહ કરે લોકાલ ડેવેલોપમેન્ટ ફ્રેમવર્ક ગ્રુપ (Local Development Framework Group)-કે (01274) 434050, (01274) 434544 વાં (01274) 434606 નાંધારે ફોન કરણ ।

یہ دستاویز بریڈفورڈ ڈسٹرکٹ کے مقامی ترقیاتی لائحہ عمل سے متعلقہ دستاویزات میں سے ایک ہے۔ اگر آپ کو اس دستاویز کا زبانی یا تحریری ترجمہ کسی بھی کمیونٹی زبان میں درکار ہو یا آپ اسے بریل، لارج پرنٹ یا ٹیپ میں چاہتے ہیں تو براہ مہربانی لوکل ڈیولپمنٹ فریم ورک گروپ سے ٹیلی فون نمبر: 01274 434544، 01274 434050 یا 01274 434606 پر رابطہ کریں۔



<b>CONTENTS</b>	<b>PAGE</b>
1.0 Statement of Consultation	1
2.0 Statement of Sustainability Appraisal	3
<b>Appendices:</b>	
Appendix 1: Notice of Deposit	6
Appendix 2: Summary of Representations to Draft SPD	7
Appendix 3: General comments: changes/amendments	12
Appendix 4: List of Other Consultees	14



## 1.0 STATEMENT OF CONSULTATION

---

- 1.1 The Landscape Character SPD sets out the Council's approach to the implementation of Policies D4, UDP3, D1, D6 and D7 of the Replacement UDP (2005).
- 1.2 This Statement of Consultation has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004, and the summary of representations and the Council's response can be found in Appendix 3.
- 1.3 The draft SPD has been the subject of consultation, as resolved by Executive Committee on 16<sup>th</sup> January 2007. This consultation period ran from 23 April to 6 June 2007.
- 1.4 In line with the Regulations, and the Statement of Community Involvement (as submitted), the draft SPD and accompanying documents:
- were made available at the Area Planning Offices in Bradford Shipley and Ilkley, and at the Keighley Information Centre;
  - were made available at Central Bradford, Shipley, Bingley and Ilkley libraries;
  - were available to download on the Council's website;
  - were posted to fifty-four statutory consultees, and a further sixty-nine individuals/bodies were notified of the consultation period.

The consultation period was advertised in Bradford's local newspaper – Telegraph and Argus on 23 April 2007. The Legal Notice as advertised in the local press can be seen in Appendix 1.

- 1.5 The statutory consultees who received the draft SPD are listed below:

Addingham Parish Council	Cullingworth Parish Council
Borough of Pendle Council	Denholme Town Council
Bradleys Both Parish Council	Denton Parish Council
British Telecom	Draughton Parish Council
Burley in Wharfedale Parish Council	Drighlington Parish Council
Calderdale Metropolitan Borough Council	English Heritage
City of Wakefield M D C	Environment Agency
Clayton Parish Council	Farnhill Parish Council
Cononley Parish Council	Gildersome Parish Council
Cowling Parish Council	Glusburn Parish Council
Craven District Council	

Government Office for Yorkshire & The Humber	Otley Town Council
Harrogate District Council	Oxenhope Parish Council
Haworth, Cross Roads & Stanbury Parish Council	Sandy Lane Parish Council
Highways Agency	Silsden Town Council
Ilkley Parish Council	Steeton with Eastburn Parish Council
Keighley Town Council	Sutton-in-Craven Parish Council
Kirklees Metropolitan District Council	Telewest Communications
Lancashire County Council	Transco (North of England)
Laneshaw Bridge Parish Council	Trawden Forest Parish Council
Leeds City Council	Wadsworth Parish Council
Menston Parish Council	Weston Parish Council
Middleton Parish Council	Wilsden Parish Council
Natural England	Wrose Parish Council
Natural England (West Yorkshire Team)	Yorkshire and Humber Assembly
Nesfield with Langbar Parish Council	Yorkshire Electricity
Network Rail	Yorkshire Forward Regional Development Agency
North Yorkshire County Council	Yorkshire Water Services Ltd

- 1.6 A full list of all the other consultees can be found in Appendix 5.
- 1.7 A total of eight representations were submitted to the Council; these are set out in Appendix 2 along with the Council's response and proposed changes, if appropriate. A number of other changes have also been made for clarity and correction.
- 1.8 All respondents were in support of the document and its aims, and only minor changes were made to the document. Appendix 2 shows in which sections of the amended document the changes can be found.



## 2.0 Statement of Sustainability Appraisal

---

### Introduction

- 2.1 Article 9 of the European Directive (2001/42/EC), known as the Strategic Environmental Assessment (SEA) states that on adoption of a plan or programme (in this case a Supplementary Planning Document), a statement should be prepared setting out how environmental considerations have been integrated in to the Plan (the SPD). The statement should also include how the SPD has changed as a result of the appraisal process and the responses to the consultation; or why no changes were made. It should also include information on how the monitoring of the implementation of the document will be carried out.
- 2.2 This report satisfies the requirements of the European Directive and Government legislation and regulations as set out above.

### Integration of Environmental Considerations

- 2.3 The Sustainability Appraisal is an iterative process, and continual appraisal of the effects of the SPD enables identification of areas where the SPD can be strengthened to ensure it achieves the sustainability objectives.
- 2.4. The Sustainability Appraisal process was undertaken during preparation of the SPD, and the representations received on both the draft SPD and the Sustainability Appraisal, have resulted in a change to the amended SPD (as adopted). No representations were received on the Sustainability Appraisal and therefore no changes were made to this document.

### Consultations

- 2.6 Consultation on the draft SPD and Sustainability Appraisal Report was carried out for six weeks between 23 April and 6 June 2007.
- 2.8 Eight representations were received on the draft SPD. No representations were received on the Sustainability Appraisal Report.
- 2.9 All comments have been analysed and the Council has provided a response to each one, as well as indicating any changes to the SPD. The summary of representations to the Sustainability Appraisal Report and details of the consultation can be found Appendix 4 at the end of this report.

- 2.10 Amendments were made to the SPD in response to comments made, but none were considered so great as to result in the document being reappraised.

#### **Selection of the Adopted SPD**

- 2.11 During the production of the SPD and Sustainability Appraisal, two options were considered, the first was production of the SPD, and the second was the “business as usual” approach.
- 2.12 If the SPD was not prepared, those involved in the determination of planning applications, would have to rely on the generality of national, regional and local planning policy. The absence of an SPD would adversely affect the implementation of the policies in the Replacement UDP, offer less certainty of stakeholders, and potentially have adverse effects on the design of safe and secure built environments.
- 2.13 Adoption of the SPD would provide further information and guidance to all participants in the development control process and therefore help to implement the five relevant policies of the Replacement UDP.

#### **Monitoring**

- 2.14 Monitoring of the implementation of the SPD will be incorporated into the Annual Monitoring Report as part of the Local Development Framework. This Report will give an indication of the performance of the SPD and contains core indicators such as quality of service in relation to access to specialist advice on design. However there is a need to establish monitoring arrangements for these indicators. It is anticipated that indicators/targets will be identified in the future. Effective monitoring will allow the Council to identify any issues with the SPD and will enable any work to improve the SPD to be carried out.

#### **Conclusion**

- 2.15 The Planning for Crime Prevention Supplementary Planning Document has been prepared and has developed simultaneously with the sustainability appraisal of the effects of implementing the SPD. It has been concluded that its implementation will, overall, have a positive impact on achieving the sustainability objectives. Monitoring of the effects of the SPD will highlight any areas where it is felt the SPD is not working properly and is resulting in negative effects, and where review of the document is needed.

**CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL  
PLANNING AND COMPULSORY PURCHASE ACT 2004  
THE TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)  
REGULATIONS 2004  
NOTICE OF DEPOSIT OF DRAFT SUPPLEMENTARY PLANNING DOCUMENT  
FOR PUBLIC COMMENT  
PLANNING FOR CRIME PREVENTION  
LOCAL DEVELOPMENT FRAMEWORK FOR THE BRADFORD DISTRICT**

The City of Bradford Metropolitan District Council has published a draft Supplementary Planning Document called Planning for Crime Prevention for public comment. The draft Supplementary Planning Document sets out the approach that will be taken by the Council with regard to ensuring the design of new development is of a high quality and promotes safe and secure environments.

Copies of the Draft Supplementary Planning Document are available for inspection at the Council's Planning Offices at:

- Jacobs Well, Manchester Road, Bradford BD1 5RW  
(Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Keighley Information Centre, Town Hall, Bow Street, Keighley BD21 3PA  
(Mon-Thurs 8.30am to 5pm, Fri 8.30am to 4.30pm)
- Shipley Town Hall, Kirkgate, Shipley BD18 3EJ  
(Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Ilkley Town Hall, Station Road, Ilkley (Mon-Thurs 9am to 5.00pm, Fri 9am to 4.30pm)

And at the following libraries:

- Bradford Central Library, Princes Way, Bradford BD1 1NN  
(Mon-Fri 9am to 7.30pm, Sat 9am to 5pm)
- Shipley Library, 2 Wellcroft, Shipley BD18 3QH (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Bingley Library, Myrtle Walk, Bingley BD16 1AW (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Ilkley Library, Station Road, Ilkley LS29 8HA (Mon-Fri 9am to 7pm, Sat 9am to 5pm)

And on the Council's website at [www.bradford.gov.uk/planningforcrimeprevention](http://www.bradford.gov.uk/planningforcrimeprevention)

Also available for inspection are the Council's Sustainability Appraisal Report, Consultation Statement and the Statement of Matters.

Any person may make representations about the Supplementary Planning Document. Representations must be made in writing and submitted by either email to [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk) or by letter to Local Development Framework Group, Plans and Performance Service, 8th Floor, Jacobs Well, Bradford BD1 5RW.

The closing date for comments is 6 June 2007. Comments should be headed 'Planning for Crime Prevention Supplementary Planning Document'. Any representations may be accompanied by a request to be notified at a specified address of the adoption of the Supplementary Planning Document.

Dated this 23rd April 2007.

Alan Mainwaring, Strategic Director (Regeneration), Jacobs Well, Bradford

## APPENDIX 2: SUMMARY OF REPRESENTATIONS TO DRAFT PLANNING FOR CRIME PREVENTION SUPPLEMENTARY PLANNING DOCUMENT

Consultee	Comment(s) on Draft Planning for Crime Prevention SPD	Bradford MDC Response	Change(s) to SPD
1. Bradford District Chamber of Trade	1.1 The Chamber is supportive of the provisions and aims of the SPD.	The Chamber's support of the document is noted.	No changes to the SPD.
	1.2 New build development should have, without exception, a strong presumption against rear access footpaths. This is not always achievable with existing buildings and conversions.	The document recognises that the side and rear elevations of buildings, particularly dwellings, can be the most vulnerable to break-ins and unwanted access, particularly if there is no means of controlling who can access these areas. In this respect the document requires that in new development, the spaces to the side and rear of buildings, particularly dwellings, should not be accessible by the public and should not border public space where possible. The document also explicitly discourages the creation of alleyways, gated or otherwise. However, with existing buildings and conversions this will not always be possible.	No changes to the SPD.

	<p>1.3 Conversions in or near the city / town centres (such as mill conversions to residential) very rarely provide an appropriate amount of parking, as it is incorrectly assumed that prospective occupiers will not own cars. In reality residents occupy on-street parking spaces in the surrounding streets. This provides more opportunity for vehicle crime and denies the users of the city or town centre parking places.</p>	<p>Design Principle L of the SPD sets out the preferred options for car parking with regards to security. The preferred type of parking is within private property with access control (which in town and city centres would be multi-storey or subterranean parking with access barriers and formal surveillance such as CCTV). Surface parking on private property with access control and overlooking from the building(s) the parking is associated with is an equally appropriate option in city and town centres. The next most appropriate form of parking with regard to security in city and town centres is in an on-street location where it is well overlooked, particularly where the vehicle owners can see their vehicles from whichever building they are inside. The SPD discourages the parking of vehicles in places that anyone can access (such as on open private land or open communal car parks) which are neither formally supervised nor where people can see their vehicles from inside buildings. Therefore the SPD encourages on-street car parking, but generally only when it is used by people occupying or visiting the buildings adjoining the street. It is vital that people can easily check on their vehicles or are likely to hear or see any criminal activity and be able to raise alarm. The amount of parking associated with a development is determined in accordance with the Council's Adopted Parking Standards, which are associated with Policies TM11, TM12 and TM19 of the Replacement UDP, which are afforded greater weight in making planning decisions than the Planning for Crime Prevention SPD.</p>	<p>No changes to the SPD.</p>
--	--	--	-------------------------------

	1.4 The use of barriers, lockable bollards and street furniture should not be used in the first instance to control access to streets and reduce traffic flows. Creating no go zones for traffic in town and city centres harms the viability of local businesses and undermines community safety.	The SPD does not advocate the closure of public highways to through traffic or introducing access control mechanisms to public highways. The SPD encourages the creation of clear boundaries (either physical or symbolic) between public and private space. If anyone can wander unchallenged into a private car park or domestic garden, this accessibility can be exploited for criminal activity and antisocial behaviour. It is in the interest of the owners and occupiers of private property to be able to have influence and control over their land and buildings in order to discourage and prevent crime and antisocial behaviour. However, the document does not suggest that such measures should be introduced to public highways, which by definition should be open to all users.	No changes to the SPD.
2. Regulatory & Appeals Committee, City of Bradford Metropolitan District Council	2.1 The Committee welcomes and endorses the document and looks forward to its implementation.	The Committee's support of the document is noted.	No changes to the SPD.
	2.2 All members of planning panels and planning committees should be briefed and made aware of this document.	Training to be organised jointly with West Yorkshire Police Architectural Liaison Officers	No changes to the SPD.
	2.3 The terms 'defensible space' and 'natural surveillance' sound somewhat militaristic and are not commonly used terms. Alternatives should be considered.	These terms were coined in the mid-1970s in America when research into the connection between design and crime began. They are commonly used and understood by practitioners and the terms are readily explained in Chapter 2 of the document. Terms such as 'defensible space' and natural surveillance are used in national guidance and in conjunction with Policy D4 of the Replacement UDP.	No changes to the SPD.

	2.4 The document does not consider the impact of the design and siting of cycle parking on the wider public realm.	It is acknowledged that with on-street cycle parking being street furniture, it is essential that its design is complementary to the wider street scene and its siting considers movement patterns and the requirements of different users of the street.	Add a bullet point under Design Principle K: Secure Cycle Parking which emphasises the need for cycle parking to complement the wider street scene and consider movement patterns and the requirements of different users of the street.
3. Craven District Council	3.1 No comments on the SPD	Craven District Council's acknowledgement is noted.	No changes to the SPD.
4. Highways Agency	4.1 No comments on the SPD	The Highways Agency's acknowledgement is noted.	No changes to the SPD.
5. Natural England	5.1 No comments on the SPD	Natural England's acknowledgement is noted.	No changes to the SPD.
6. The Theatres Trust	6.1 The Trust recognises the importance of reducing crime and the fear of crime, particularly in town centres. No comments on the SPD.	The Theatre Trust's acknowledgement is noted.	No changes to the SPD.
7. Yorkshire and Humber Assembly	7.1 No comments on the SPD	The Yorkshire and Humber Assembly's acknowledgement is noted.	No changes to the SPD.
8. Yorkshire Forward	8.1 Yorkshire Forward welcomes the SPD and considers that it would support the Regional Economic Strategy 2006-2015.	Yorkshire Forward's support for the document is noted.	No changes to the SPD.
	8.2 Yorkshire Forward welcomes proposals to encourage mixed use development and increasing levels of natural surveillance.	Yorkshire Forward's support for the document is noted.	No changes to the SPD.

	8.3 Yorkshire Forward supports proposals for secure cycle parking and safe and desirable pedestrian routes as this would facilitate a modal shift away from the private car and towards sustainable forms of travel.	Yorkshire Forward's support for the document is noted.	No changes to the SPD.
--	--	--	------------------------



### **APPENDIX 3: SUMMARY OF ADDITIONAL CHANGES/AMENDMENTS TO DRAFT PLANNING FOR CRIME PREVENTION SUPPLEMENTARY PLANNING DOCUMENT**

---

#### Cover:

- Remove 'Draft for Consultation'
- Change 'April 2007' to 'July 2007'
- Insert WY Police logo adjacent to CBMDC logo.

#### Foreword:

- Remove the word 'draft'
- At the end of the text insert the following paragraph: 'The draft of this document underwent public consultation between April and June 2007 in accordance with the requirements of the Town and Country Planning (Local Development) (England) Regulations 2004. The Planning for Crime Prevention Supplementary Planning Document was adopted by the Council on 26<sup>th</sup> June 2007.'

#### Footers:

- Remove 'Draft for Consultation' and change date to 'July 2007'.

#### Page 9:

- Change second paragraph in middle column to: 'At present there are five other SPDs which have been adopted by the Council which support 'Planning for Crime Prevention'. Since these documents are all rooted in the policies of the RUDP, they carry equal weight in the planning system and are intrinsically complementary to one another. These are:'
- Remove the words '(adopted)' and '(draft)' from the list in the third column.
- Remove the word '(adopted)' from the last paragraph in the third column.
- In the Royds textbox change the last sentence in the middle paragraph to: 'The scheme recognised that environmental improvements alone would only go so far in lowering crime rates. At The Royds the underlying social problems of crime such as drug use. The scheme also provided employment, experience and training for local young people, which ran in tandem with improving access to the job market.'
- In the Royds box change the first sentence of the last paragraph to: 'By simultaneously addressing the social, economic and environmental contributors to crime, levels of crime have plummeted in The Royds neighbourhood. The improvements made to properties and the wider environment and the quality of new development in The Royds will benefit all existing and future residents of the area.'

Page 17:

- Middle column, lowest bulletpoint: add 'gated or otherwise' at the end of the second sentence.

Page 23:

- In the first bulletpoint under Design Principle I: Safer Streets, insert the following sentences between the current two sentences: 'In most locations in the district this would mean having pavements and cycleways next to roadways, but in quiet residential streets a shared surface might be appropriate. The key aim is to ensure that different users of the street can see each other, making the street feel safer and more inviting, particularly at night.'

Page 26:

- Add a new bulletpoint at the end of the list after Design Principle K which reads 'Cycle parking should be of a high quality design and complement or enhance the wider street scene. The scale and type of cycle parking in the public realm should be appropriate to its location and should not hinder pedestrian flows or detract from important views.'

Page 29:

- In the footnote change 'Safer Streets' to 'Safer Places'

Page 30:

- In the middle column add a footnote reference after 'Places, Streets and Movement: A Companion Guide to Design Bulletin 32 – Residential Roads and Footpaths'. The new footnote should read: 'Places Streets and Movement' has been superseded by the 'Manual for Streets' (2007).'

Useful Organisations:

- Change the West Yorkshire Police's postcode to BD5 0DX

Insert the following e-mail address for the Government Office for Yorkshire and Humber: [www.goyh.gov.uk](http://www.goyh.gov.uk)

## APPENDIX 4: LIST OF OTHER CONSULTEES

---

Bradford Councilors	DPDS Consulting Group
Bradford MP's	Future Energy Yorkshire
	Garbe Real Estate Ltd
Able All Physically Disabled Forum	George Wimpey Northern Yorkshire Ltd
Ancient Monuments Society	Goldfinch Estates Ltd
Asian Business Forum	How Planning
Asian Trades Link	Ilkley Design Statement Group
Baildon Community Link	Indigo Planning Ltd
Barton Willmore Planning	Inland Waterways Association
Ben Bailey Homes	Jeff McQuillan Consulting
Ben Rhydding Action Group/Save Us Pub	Land & Development Practice
Bradford & District Coalition of Disabled People	Leith Planning Ltd
Bradford Access Action	Littman Robeson
Bradford Centre Regeneration	Mobility Planning Group
Bradford Chamber of Commerce & Industry	Mr T Bendrien
Bradford Community Housing Trust	Mrs B Smith
Bradford District Chamber of Trade	North Country Homes Group Ltd
Bradford Retail Action Group	Npower Renewables
British Wind Energy Association	Paul & Co
Bruce Barnes	Peacock and Smith
Burnett Planning & Development	Penny Trepka
Campaign For Real Ale	Planning Potential
Carter Jonas	Planning Prospects Ltd
CB Richard Ellis Ltd	Plot of Gold Ltd
Chris Thomas Ltd	Regen 2000
Commission for Architecture and the Built Environment	Reverend John Nowell
Council for British Archaeology	Reverend Sarah Groves
Countryside Properties (Northern) Ltd	Royds Community Association
Crimestoppers UK	RPS
DDA Task Team	Safer City – Bradford & District
Depol Associates	Sanderson & Weatherall
DevPlan UK	Society for the Protection of Ancient Buildings
Dialogue Communicating Planning	St Aidan's Presbytery
	The Abbeyfield Society

The Emerson Group  
The Garden History Society  
The Georgian Group  
The Theatres Trust  
The Twentieth Century Society  
The Victorian Society  
Trident  
United Co-operatives Ltd  
Vincent and Gorbing Ltd  
Visual Disability Services  
Walton & Co  
West Yorkshire Police (Crime Prevention)



Produced by the  
City of Bradford Metropolitan  
District Council

Local Development  
Framework Group

October 2008