

Statement of Consultation

(including Schedule of Changes)

For *Homes and Neighbourhoods: A Guide to Designing in Bradford* (Supplementary Planning Document)

February 2020

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Part One.

The Statement of Consultation

Introduction

This Statement of Consultation has been prepared for the following document:

‘Homes and Neighbourhoods: A Guide to Designing in Bradford’ SPD

It is intended that the Homes and Neighbourhoods Guide will be adopted as a Supplementary Planning Document (SPD). Its purpose will be to achieve a step change in the quality of new housing development in the District in support of policies in the Local Plan Core Strategy.

The Town and Country Planning Regulations and the Council’s Statement of Community Involvement (SCI) require that before adopting an SPD Local Planning Authorities must allow anyone to make representations on the document for a period of not less than 4 weeks, and that they must prepare a statement setting out:

- The people who were consulted
- A summary of the main issues raised
- How those issues have been addressed in the SPD

The consultation process took place in two stages. The first stage involved early engagement with key stakeholders and groups. The second stage involved a formal eight-week consultation period on the draft guide. These are detailed below.

Stage 1 – Early Engagement

The following organisations and groups were involved throughout the early stages of preparing the guide:

- **Born in Bradford:** one of the world’s largest research studies, it is tracking the lives of over 30,000 Bradfordians to find out what influences the health and well-being of families.
- **Older and Disabled People Group:** this brought together people from various groups across the District representing a range of interests. They include those with mobility problems, older people, visually impaired people, dementia sufferers and people with learning difficulties.
- **Bradford Civic Society:** a society that champions Bradford’s heritage and built environment, and encourages higher standards of design and architecture in new development.
- **Bradford Property Forum:** a network of local property professionals, including architects, planners, developers and surveyors.
- **House builders:** the main developers of housing in the District.

Engagement in the form of workshops and structured discussions with these stakeholders took place as follows:

- **18th October 2018** (Project Inception) – Born in Bradford
- **14th/15th November 2018** – Bradford Property Forum, Older and Disabled People Group, Bradford Civic Society, Born in Bradford, Incommunities.
- **16th/17th January 2019** – Bradford Property Forum, Bradford Civic Society, Older and Disabled People Group
- **13th February 2019** – House builders
- **20th March 2019** – Bradford Property Forum and House builders

The comments and viewpoints shared at the workshops fed into the preparation of the guide and electronic copies of the emerging draft document were also circulated to attendees for further comment. Workshops also took place with officers from departments across the Council in October, November, January and March.

To help raise interest in the guide a public photo competition ‘Streets of Bradford’ was held in partnership with Bradford Civic Society during March 2019 utilising the Society’s Instagram page. The selected winning images were used in the guide.

The input received during this early stage of engagement really helped to shape the document and make it specific to Bradford and responsive to important local issues, reflected in the vision for *“green, safe, inclusive and distinctive neighbourhoods that create healthy communities for all.”*

Following this engagement stage a consultation draft document was produced in May 2019 and was given approval to consult at the 11th June Meeting of the Executive.

Stage 2 Formal consultation

In line with the Planning Regulations an extended eight-week public consultation period took place on the guide between **30th July and 24th September 2019**.

The following documents were made available for public comment:

- Homes and Neighbourhoods: A guide to designing in Bradford – Consultation Draft
- Strategic Environmental Assessment (SEA) – Initial Screening Statement
- Habitats Regulations Assessment (HRA) – Initial Screening Statement
- Equalities Impact Assessment (EIA) – Initial Screening Statement

An electronic version of the consultation documents (along with a formal ‘Regulation 18’ Notice) were put on the Council’s website with a link on the homepage. Printed copies were placed for people to view at the following locations.

- Council 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

Notifications of the consultation and details on where to view the document were given in a consultation letter/E-mail, in the Local Plan e-newsletter and website.

The consultation e-mail was sent out on 30th July 2019 to the following:

- Individuals who have signed up to the Council's online Stay Connected system
- 89 Statutory consultees (including 5 MPs)
- 90 Councillors

A press release was issued to media company Newsquest Group who produce the newspapers covering the Bradford District in the run up to the consultation and the Meeting of the Executive. Articles appeared in the Telegraph and Argus on 3rd and 12th June 2019.

Representations were received during the consultation from a range of individuals, community groups, business interests and other organisations (a full list is provided in Part Two of this document). There was a lot of general support for the guide along with specific suggestions on a variety of matters of how it could be improved.

The comments received from the public consultation have been incorporated into the document as far as possible. A number of changes have been made including in relation to key issues such as the climate emergency, cycling and housing standards.

A summary of the issues raised, the Council's response to them and the recommended changes is set out in Part Three of this document.

Part Two.

List of respondents

The table below lists the respondents along with their own individual reference number and the relevant pages of the guide which they made comments on. This can be cross-referenced with the summary of responses and the recommended changes in Part Three.

ID ref.	Name / Organisation (where applicable)	Relevant sections
01	Antonia Woosnam-Savage / Lower Wharfedale Ramblers	General (a) Part B – 1.2, 2.3 Appendix 1
02	Laura Hobbs / Yorkshire Wildlife Trust	Part B – 2.9
03	Millie Brown / Centre for Ageing Better	Part B – 2.17
04	Jenny Jowle / Better Start Bradford	Part B – 2.6, 2.10
05	Richard Fordham / Sport England	Part A – Priority 4, Policy and Guidance
06	Christopher Moore	Part B – 2.3, 2.4, 2.15
07	Melanie Lindsley / The Coal Authority	Part A – Priority 6
08	Shaun Armitage-Morris / Bradford Mobility Planning Group	Part B – 2.15, 2.17
09	Alan Reiss / West Yorkshire Combined Authority	General (a, b, f) Part A – Priority 7, Policy and Guidance Part B – 1.5, page 52, 2.2, 2.3, 2.8, 2.11, 2.15, 2.17, 3.9 Further Reading
10	Dr George Holmes / University of Leeds	Part B – 2.3, 2.15
11	David Blackburn / Ilkley Civic Society	General (a, c, f, g, h) Part A – Introduction, Priority 5, Policy and Guidance, Process, Pre-

		App Meetings, Design & Access Statements, Part B – 1.2, 1.3, 1.5, 2.2, 2.3, 2.4, 2.5, 2.7, 2.11, 2.17, 3.8, 3.9 Appendix 1
12	Rick Battarbee / Addingham Civic Society Environment Group	General (a, f, g) Part A – How to Use the Design Guidance, Priority 7, Part B – 1.5, 2.9
13	Mark Johnson / Johnson Mowat	Part B – 2.17, 3.2 Appendix 1
14	Jeff McQuillan	General (j) Part B – 3.2
15	James Craig	General (a, c, d, f) Part B – 1.5, 2.3, 2.15
16	Anthony Plumbe / Campaign for Better Transport West & North Yorkshire	General (d, e, f) Part A – Priorities 4 & 7 Part B – 1.5, 2.2, 2.3, 2.7, 2.11, 2.15
17	Fraser Tomlinson / Environment Agency	Part B – 1.5, 2.7, 3.9
18	Gail Denham / Wilsden Parish Council	Part A – Policy and Guidance, Engagement and Consultation
19	Will Cartwright / Heritage Planning Design (HPD)	Part B – 3.6
20	Christina McGill / Habinteg Housing Association	Part B – 2.11, 2.17, 3.2
21	Susan Spink / CBMDC Waste Services	Part B – 2.16
22	Angela Hutton / CBMDC Public Health	General (a, e, f, i) Part A – Priorities 2, 3 & 4, Site & Context Analysis Part B – 1.5, 2.6

Part Three.

Summary of Responses & Schedule of Changes

This section provides a summary of the comments received from the public consultation period along with the Council's response to them and the changes made to the Consultation Draft document.

It starts by addressing those comments which are general to the guide as a whole before moving onto more specific comments in page order.

Where changes have been made they are shown in a box using the format shown below.

Text Changes

New text is shown in bold italics like ***this***.

Deleted text is shown with a strikethrough like ~~this~~.

Existing, unchanged text is shown in grey like **this**.

Other changes such as changes to images, graphics etc are shown in a grey box like this.

Front Cover (Page 1)

Recommended Changes:

~~CONSULTATION DRAFT JULY 2019~~ **ADOPTED FEBRUARY 2020**

GENERAL ISSUES

General (a) – support for the guide

Respondent ID: 01, 02, 05, 08, 09, 10, 11, 12, 13, 15, 17, 18, 19, 20, 22

Summary of responses: A number of comments were made broadly supporting the content, format and objectives of the guide and its relevance to current issues in Bradford District, particularly regarding matters such as health, play, biodiversity, active travel and connectivity. Comments of support were also received in relation to specific issues and these are included under the relevant sections below.

Recommended Changes: None

General (b) – Length of the guide

Respondent ID: 09

Summary of responses: Concern was expressed that at 120 pages long the document would be a long read. Suggestions were made to streamline it including cutting out content and detail on pages 18, 20, 26, 27 and 40.

Council Response: The Council is mindful that this is a long document but there are so many aspects which go into making a successful neighbourhood that it is difficult to select anything which could be left out. The advice for residents and communities (p27) for instance has been included in response to suggestions from the workshops as has the process diagram (p18, 20, 26) which is intended to be a thread running through the document. As the respondent notes the graphic design, layout and visual nature of the document hopefully mean that it is easy to use and doesn't feel like a long read.

Recommended Changes: None

General (c) – Consultation on the guide

Respondent ID: 11, 15

Summary of responses: Comments were made regarding that the stakeholder involvement was light on the wider involvement of community groups and was city centre biased. And that reference should be made to the outcomes from various consultations that have already happened, e.g. 'Shipley Reimagined' and Trident. These highlighted that people would like pleasant, pollution-free areas where cycling

and walking are convenient for people of all ages, trips to the local shops and schools are easy, and the roads are not congested, motorists are not choking everyone and everything up in the neighbourhood.

Council Response: The stakeholder engagement undertaken on the guide has gone well beyond what would normally be expected or required for a document of this type, though it is noted that the representation could have been wider. From the engagement that has taken place similar messages have been raised regarding the type of places where people would like to live and the Guide aims to reflect this with its vision for 'Green, Safe, Inclusive and Distinctive Neighbourhoods that create Healthy Communities for all.'

Recommended Changes: None

General (d) – Strategic transport issues

Respondent ID: 15, 16

Summary of responses: Comments were made in relation to strategic transport issues in relation to:

- i. New road building/widening (e.g. Canal Road) and the consequences this will have in terms of more traffic, more pollution, more congestion etc and how this will not help move forward the agenda for clean, healthy living and carbon reduction. A more radical stance is needed including more provision for sustainable transport - cycling and walking, cheaper buses and trains and radical fare structures to encourage more people onto public transport.
- ii. There is a need to develop regional delivery centres for building materials to development sites, as well as parcel delivery centres at the entry to neighbourhoods for to which internet orders can be delivered and collected.

Council Response: It is noted that these are very important issues but decisions on building new roads, setting bus/train fares and where to locate delivery centres are outside the remit of this document which is focused on the design of new housing development. It seeks to ensure that neighbourhoods are designed to prioritise and encourage sustainable modes of travel. Further changes are made to section 2.3 (pages 56-57) to emphasise priority for pedestrians and cyclists and well connected networks of routes.

Recommended Changes: See changes to section 2.3 (pages 56-57).

General (e) – Avoiding car dependent development

Respondent ID: 16, 22

Summary of responses: The comments highlight that new house building has proved unsustainable in terms of generating substantial car-based travel, despite mostly according with planning norms of being within 300/400m of a bus stop and 1km of a rail station. Instead a composite guideline distance averaging no more than 400m across a range of common destinations like employment locations, retail locations

(like supermarkets), educational establishments, and leisure centres needs to be adopted. Reference is made to the checklist developed by 'Transport for Homes'.

Also comments request that the 'well-connected' message is strengthened in the guide as this will be one of the most crucial adaptations to climate change and will also contribute to improving air quality, reducing carbon and other emissions.

Council Response: As a Supplementary Planning Document the role of the guide is to support policy in the Local Plan Core Strategy. Appendix 3 of that document sets out accessibility standards (walking distances) for new residential development to public transport and local services. A reference will be made to these in the guide. They are broadly consistent with the Transport for Homes checklist.

The guide very much seeks to ensure that development is designed to reduce car dependency. It is agreed that locating new homes in well-connected places within easy walking distance of a range of public transport and local facilities has many benefits and to emphasise the importance of this issue changes are proposed to a number of sections in the guide.

Recommended Changes: See changes to Priorities 3 and 4 (page 11), 1.2 (pages 36-37) and 1.5 (pages 48-49).

General (f) – Addressing the Climate Emergency

Respondent ID: 09, 11, 12, 15, 16, 17, 22

Summary of responses: Various respondents have commented that the guide needs to do more to address the climate emergency including the Leeds City Region's Climate Coalition target of net zero carbon by 2038, and the Committee on Climate Change recommendations, specifically with regard to

- i. 'Sustainability principles' and the importance of a zero-carbon approach should be stressed throughout the document.
- ii. More emphasis on encouraging all development to be 'climate resilient'.
- iii. Embedding climate change *adaptation* in the SPD e.g. by encouraging significant rather than token levels of green infrastructure
- iv. Mentioning the 'embodied energy' in existing buildings
- v. Reducing the need to travel by ensuring local proximity of services (health centres, schools, community centres, basic retail) and by permitting more mixed use in neighbourhoods should figure more prominently in the SPD.

Council Response: It is acknowledged that this is a crucial issue. In response to the comments changes have been made to a number of sections, giving greater emphasis to addressing the climate emergency, the need for climate resilient development, providing significant green infrastructure, reducing the need to travel and the importance of reusing existing buildings.

Recommended Changes: see changes to pages 10, 13, 16, 48-49, 65, 68-69, 110-111

General (g) – The existing built environment

Respondent ID: 11, 12

Summary of responses: The guide is biased more to the natural environment when content on the built environment should have equal standing. Also the emphasis is on new build development with very little content on conversions. To be a truly sustainable document the same principles and guidance should be applied not just to new homes and neighbourhoods but to alterations/additions/refurbishment of the existing built environment, for example retrofitting SuDs and improving energy efficiency when houses are extended etc.

Council Response: The Design Guide will be a supplementary planning document (SPD) to be used in the determination of planning applications. It will apply to all scales of new housing development from an individual house to large sites, including the conversion of existing buildings to residential where they require planning permission. The guide has also fed into the process of updating the Housing Strategy for the District which takes a holistic overview of housing issues including the existing stock.

Additional references will be made in the guide to prioritising the reuse of existing buildings and encouraging the application of the principles to the retrofit/refurbishment of existing housing.

Recommended Changes: see changes to pages 13, 16, 48-49, 110-111

General (h) – Modular Homes

Respondent ID: 11

Summary of responses: Missing from the vision is the future use of modular housing, on which we note Wakefield MDC has included a whole section in its Design Guide.

Council Response: a new case study on modular homes will be added to section 3.9.

Recommended Changes: see changes to pages 110-111 (section 3.9)

General (i) – More visual examples

Respondent ID: 22

Summary of responses: There could still be more visual demonstration of some of the hardest to achieve shifts e.g. more sample design layouts that prioritise active travel.

Council Response: see below.

Recommended Changes: subject to available space and copyright issues additional images will be included in the final version of the guide.

General (j) – Design Process

Respondent ID: 14

Summary of responses:

- i. The impression given by the efforts of the private building industry is about building to maximise profits. The industry has failed to be creative and failed to listen to the needs of the modern family. Why should housing developers pay for good design when they can get away with ‘bog-standard’ layouts and house types, some unsuited to the characteristics of the housing site.
- ii. Planners should take a much bolder approach with prospective applicants and encourage dialogue before submission of planning applications. The quality of housing estates is extremely poor and often is car-dominated with little or no opportunity for children’s’ play spaces or other communal public areas.
- iii. The other tool that planners used was the Planning Brief that set out the principles for how a particular housing site should be designed and built. This could provide an opportunity for Bradford Council to involve other disciplines like landscape architects so that sites fit well into the existing fabric of settlements with maximising opportunities for connectivity.
- iv. We need better quality of homes and places where people live. Bradford Planners should lead a conversation about how to achieve more aspirational homes/areas that do not necessarily cost more. They should be assisted by a Local Design Forum that comprises members passionate for a better quality of living and more sustainable living through cycling and walking.

Council Response:

The Guide sets out a process for applicants to follow when developing their schemes (p18-19). This starts by analysing the site and its context and defining the brief and meeting with Council Officers to agree the design concept before moving on to developing the design details.

Priority is given to early discussions with planners and communities starting at pre-application stage and continuing throughout the process (p20-23). The applicant’s Design & Access Statement should be developed from this process and set out why the design decisions have been taken (p24-25). It is hoped that getting the process right from the outset will lead to better quality housing developments.

The Guide also includes guidance (p26-27) for developers on balancing cost and quality, and for residents and communities who wish to get involved in the process.

The proposition of a Local Design Forum is noted but would be something for the Council to explore outside of the remit of this document.

The guide includes principles with regard to improving the car domination of streets, children’s’ play spaces and communal public areas (see Topics 2.4, 2.6, 2.10, 2.15).

Recommended Changes: None

PART A

Introduction (Page 7)

Respondent ID: 11

Summary of responses: It's surprising that the council is not attempting to require the types of houses 'needed' but appears to be relying on houses that suit the developers 'Target market'. A much wider range of opinions need to be sought as to housing needs as the market will fail to include social and practical needs of residents.

Council Response: Priority 1 in the guide 'Choice' is all about delivering a range of types of homes to meet the needs of people in the District. The guide also seeks to provide certainty for developers in terms of what is expected whilst ensuring that schemes remain economically viable. A recent review of the Bradford Strategic Housing Market Assessment (SHMA) included a large survey of residents in the District to get a clear, up to date picture of local housing needs.

Recommended Changes: None

Vision (Page 9)

Respondent ID: 11

Summary of responses: surprised so see no mention of 'heritage' that adds so much to the value of Bradford in all senses

Council Response: It is agreed that heritage is a very valuable asset of the District. The vision includes the term 'distinctive' and Priority 5 'Distinctive' on page 12 explains more about the importance of the character of the District. An additional reference to highlight the value of heritage will be included under Priority 5.

Recommended Changes: see changes to page 12 (Priority 5).

Priority 2 Green (Page 10)

Council Response: changes made in response to comments under General Issues (f) – Addressing the Climate Emergency.

Recommended Changes:

(1)

Green streets and spaces, **and connected networks of green infrastructure**

(2)

Green corridors, and blue and green infrastructure, should connect areas, helping

people and wildlife get about and to sustain biodiversity **and create climate resilient places.**

Priorities 3 Healthy and 4 Inclusive (Page 11)

Respondent ID: 05

Summary of responses: The principle of improving health and wellbeing in the layout of housing developments is welcomed. It provides the opportunity to incorporate the principles of Active Design into new developments. Sport England in partnership with Public Health England, have produced the Active Design Guidance of 10 Principles building on the objectives of improving accessibility, enhancing amenity and increasing awareness.

Council Response: Supporting comments.

Recommended Changes: References to Active Design are added elsewhere in the guide – see comments under pages 14-15 (Policy and Guidance).

The following changes are in response to comments under General Issues (e) – Avoiding car dependent development.

3 INCLUSIVE

Development should contribute to making walkable, **well connected** neighbourhoods where homes are close to community amenities, shops, green space and workplace; and where footpaths give priority to pedestrians, wheelchair users, buggies and people with impairments.

4 HEALTHY

The design of a healthy, **well connected** neighbourhood must be made to work at every scale. It will start with locating development in places where residents will not be condemned to using a car or being stuck at home.

Priorities 5 Distinctive and 6 Slopes (Page 12)

Respondent ID: 07

Summary of responses: pleased to see that Priority 6 'Slopes' makes reference to good development being based on understanding the ground conditions, including stability issues and history of past mining activity.

Council Response: Supporting comments.

Recommended Changes: No change except the following in response to comments under page 9 (Vision).

5 DISTINCTIVE

Neighbourhoods with identity reflecting the district's varied character **and heritage**

Priority 7 Efficient (Page 13)

Respondent ID: 09, 11, 12, 15, 16, 17, 22

Summary of Comments: Various respondents have commented that the guide needs to do more to address the climate emergency including the Leeds City Region's Climate Coalition target of net zero carbon by 2038, and the Committee on Climate Change recommendations, specifically with regard to:

- i. 'Sustainability principles' and the importance of a zero-carbon approach should be stressed throughout the document.
- ii. 'sustainable' would be a better term for one of the priorities rather than just 'efficient' use of resources
- iii. more emphasis on encouraging all development to be 'climate resilient'.
- iv. embedding climate change *adaptation* in the SPD
- v. mention 'embodied energy' in existing buildings
- vi. Reducing the need to travel by ensuring local proximity of services (health centres, schools, community centres, basic retail) and by permitting more mixed use in neighbourhoods such that nearby employment opportunities are enabled, should figure more prominently in the SPD.

Also see comments under Priority 2 and sections 1.5 and 3.9.

Council Response: References have been added to the climate emergency, the need for climate resilient development and the importance of reusing existing buildings.

Renaming this priority as 'Sustainable' or 'Resilient' has been considered however it is felt that many of the other priorities also play a part in sustainability and climate resilience, particularly '2 Green', '3 Inclusive' and '4 Healthy' and that this priority deals specifically with the key objective of using resources efficiently.

Recommended Changes:

(1)

7 EFFICIENT

~~Efficient use of resources~~ **Using resources efficiently to achieve climate resilient development**

(2)

New development must be designed to use resources efficiently to contribute to the District's efforts to address the climate emergency. A development's location, density and all aspects of transport must be carefully planned, particularly to minimise the use of cars. Sustainable drainage will make good use of water and reduce the risk of flooding. The effects of sun and wind must be considered in such matters as passive solar gain, shading, and the microclimate of public spaces. The energy demand for heating, lighting, hot water and cooling should be minimised, and low-carbon energy solutions used. Designing for waste should include arrangements to collect separated waste streams and ~~minimise the impact of the waste collection system on the public realm.~~ ~~C~~ carefully considered construction processes can themselves help to minimise waste and the use of energy. **Priority should be given to reusing of**

existing buildings as this is inherently more sustainable than demolition and building anew.

~~Badly designed homes and neighbourhoods waste resources, and lock in undesirable patterns of consumption and living for years to come.~~

(3)

KEY RELATED PRINCIPLES

1.5 Prioritise the environment

2.2 Density and scale

2.3 Movement

2.7 Water and Drainage

2.16 Waste

3.4 Light and ventilation

3.8 Materials and details

3.9 Energy efficiency

Policy and Guidance (Pages 14-15)

Respondent ID: 05, 09, 11, 18

Summary of responses:

- i. The SPD could include reference to new development meeting the principles of Active Design and that in any planning application, the applicant should submit a statement setting out how the design and layout of the development meets the principles of Active Design.
- ii. The guide refers to Building for Life but stops short of requiring 12 greens – this is something that could be considered as it should be achieved if the principles in the guidance are followed.
- iii. A major omission is the listing of all current and in preparation SPDs and of externally produced documents referred to in the text.
- iv. There are no references to Neighbourhood Plans. As Planning Policy Guidance makes clear a neighbourhood plan is also an important part of the Local Plan for specific areas and this must be referenced in this section.

Council Response: Changes are proposed to this section to reference Active Design, Building for Life 12, other SPDs and Neighbourhood Plans, as well as the new National Design Guide.

This stops short of requiring schemes to achieve 12 'greens' under Building for Life, based on advice on the Design Council's own website which explicitly recommends to avoid using it in this way. Nor does it require applicants to submit evidence showing how they have addressed the Active Design principles.

However a number of changes are made to signpost to specific principles under relevant sections in Part B of the document to firmly embed the objectives of BfL12 and Active Design as follows:

Active Design – references added to sections 1.4, 2.3, 2.4, 2.5, 2.6, 2.10, 2.15, 2.17, 3.3, 3.5.

Building for Life12 – references added to sections 1.3, 1.4, 2.3, 2.4, 2.5, 2.6, 2.8, 2.11, 2.13, 2.14, 2.15, 2.16, and 3.8.

Recommended Changes:

(1)

NATIONAL POLICY

The NPPF is supplemented by the government’s National Planning Practice Guidance (NPPG), ~~a useful guide to making the most of the planning process in raising standards of design. NPPG provides more detail about the importance of design, the tools available to achieve it and particular considerations to bear in mind for certain types of development, including housing design~~ **as well as other government produced or endorsed guidance such as the National Design Guide, Manual for Streets and Building for Life 12. In Part B of this guide the principles are cross-referenced to the relevant national policy and guidance, as well as other useful references (e.g. the Sport England and Public Health England produced Active Design Guidance).**

(2)

DISTRICT POLICY

Bradford’s Core Strategy (2017) is the adopted local plan for the district. ~~Consultation on the Bradford Core Strategy Partial Review was completed in early 2019.~~ **A Partial Review of some of the policies in the Core Strategy is currently underway including Policy HO9 Housing Quality.**

(3)

Other relevant local policy is also cross-referenced within Part B. It includes Shipley and Canal Road Corridor Area Action Plan, and Bradford City Centre **Area** Action Plan.

This guide should also be read in conjunction with any Neighbourhood Plan which covers the area of the proposed development as these will form part of the Local Plan. There is currently one adopted Neighbourhood Plan in the District at Burley-in-Wharfedale and a number of others are currently planned or are in preparation for towns and villages within Airedale, Wharfedale and the South Pennines.

The Council has produced a number of other Supplementary Planning Documents (SPDs) which provide detailed guidance on specific topics relevant to the design of homes and neighbourhoods. These include:

- ***Bradford City Centre Design Guide SPD***
- ***Householder SPD***
- ***Landscape Character SPD***

- **Menston Sites SPD**
- **Planning for Crime Prevention SPD**
- **Sustainable Design Guide SPD**
- **The forthcoming Bradford Street Design Guide SPD – this will be a sister document to the Homes and Neighbourhoods Guide and will provide detailed guidance on the design of residential streets.**

The Council has also published Conservation Area Assessments and Appraisals which include character specific design guidance for each of the 59 conservation areas in the District.

Other changes: Remove images of the Area Action Plans for Bradford City Centre and Shipley and Canal Road Corridor on page 15 to make space for additional text.

How to use the Design Guidance (Page 16)

Council Response: change made in response to comments under General Issues (g) – Existing built environment.

Recommended Changes:

... small schemes should still reference the headline Principles, as summarised at the start of the chapter to ensure that high-quality is delivered.

The Council will also encourage the principles in this guide to be applied to the retrofit, refurbishment, reuse and extension of existing homes and buildings in the District, particularly in terms of making them more sustainable and energy efficient.

Process (Page 18)

Respondent ID: 11

Summary of responses: ‘residents, business and landowners’ – community groups in the widest sense appear missing.

Council Response: add reference to community groups.

Recommended Changes:

It also needs to reach out to local stakeholders, using consultation and engagement that may include residents, **community groups**, business-owners and landowners.

Pre-Application Meetings (Page 20)

Respondent ID: 11

Summary of responses:

- i. Pre-App advice suggests tree and biodiversity officers but not built heritage officers?
- ii. Under MAF applications the document suggests 'Design review' which we certainly support but why does Bradford not have its own design review panel as many cities do?
- iii. There is no mention of design charrettes or community design initiatives at an early stage of the planning process.
- iv. Site analysis – a major omission we believe is that the council already has an excellent SPD on Sustainable Design that includes site analysis but this is not referred to?

Council Response:

- Add reference to built heritage officers.
- The comments on a design review panel for Bradford are noted but would be something for the Council to explore outside the scope of this document.
- Guidance with regard to involving communities is set out in the Engagement and Consultation section (pP22-23).
- A reference to other SPDs including the Sustainable Design Guide is added in Policy and Guidance section (p14-15).

Recommended Changes:

The planning authority will advise the applicant which specialist Council officers, such as the **built heritage**, tree and biodiversity officers, will need to be consulted as part of an application process.

Engagement and Consultation (Page 23)

Respondent ID: 18

Summary of responses: The section on consultation and pre-application meetings makes no reference to engagement with local councils in areas that are parished.

Council Response: a reference is added to parish and town councils in a new definitions box on stakeholders – see below.

Recommended Changes:

Definitions

Stakeholders Refers to anyone who has an interest in a project and can influence its success. Stakeholders can include local residents and businesses, community groups, parish and town councils, special interest groups and statutory authorities and service providers.

The Design and Access Statement (Page 25)

Respondent ID: 11

Summary of responses: it is strange that no reference to heritage statements appears.

Council Response: add reference to heritage statements.

Recommended Changes:

For larger, complex or more sensitive applications, further information may be required, such as a **landscape townscape** and visual impact assessment, **or a heritage statement**.

PART B

Consistency of format

Respondent ID: 09

Summary of responses: Throughout Part B – mainly in sections 2.0 and 3.0, the document would benefit from more consistency. Some sections have a clear ‘how to get there’ section, which is beneficial, but others don’t break down as clearly. It might also be useful where possible to break down for small, medium and large sites, to make this easier to follow.

Council Response: ‘How should this be done?’ titles will be added to the majority of sections which didn’t previously have it. The exceptions include sections like 2.15 Parking and 2.16 Waste which take slightly different formats in response to the specific issues they cover.

Recommended Changes:

Add ‘**How should this be done?**’ title to sections 2.5-2.13, 3.1-3.5, 3.7-3.9.

1.2 Site and Context Analysis (Pages 36-37)

Respondent ID: 01, 11, 16, 22

Summary of responses:

- i. The Checklist on page 37 has two different references to Public Rights of Way. They could be combined to say : ‘(including existing designated Public Rights of Way, and routes that that are on the PROW improvement plan). Or routes for which a Designation Application has been made.’
- ii. The Checklist refers to ‘listed and heritage buildings. Should this not be ‘listed buildings and heritage assets’? This should include reference to conservation areas and key unlisted buildings.
- iii. The Checklist (Access section) starts with vehicle access when throughout the document it says that development should prioritise active travel

infrastructure/access over vehicle-oriented layouts. They should be switched round to put the principle into practice.

Council Response: Changes are made to the checklist on page 37 to address these comments. The checklist is intended to give a broad overview of all the issues to consider and doesn't refer to specific items in detail (e.g. PROW Improvement Plan), but relevant sources of information (e.g. the Bradford Map of Plans) will be added in the policies/refs box.

Recommended Changes:

<p>SITE AND CONTEXT ANALYSIS CHECKLIST</p> <p>ACCESS</p> <ul style="list-style-type: none"> ○ Vehicular movement network (e.g. primary, secondary) ○ Pedestrian movement network (including existing Public Rights of Ways and other locally identified routes) ○ Cycle movement network (incl. National Cycle Routes) ○ Bridle path network (e.g. designated public rights of way) ○ Key access points ○ Public transport facilities (including frequency of service) ○ Vehicular movement network (e.g. primary, secondary) ○ Proximity to communal open space ○ Local destinations/services including convenience store, nursery, café, small business hub, community centre etc. ○ Desire lines
<ul style="list-style-type: none"> ○ Listed buildings and heritage buildings assets
<p>POLICIES/REFS – add:</p> <p>Bradford Cycling Strategy</p> <p>Bradford Map of Paths</p> <p>Bradford Local Cycling & Walking Infrastructure Plan (LCWIP)</p> <p>Landscape Character SPD</p> <p>Conservation Area Assessments/Appraisals</p>
<p>Remove the word “Approximate” from the plan key at the bottom of page 36 in relation to location of trees.</p>

1.3 Responding to Character (Pages 39-45)

Respondent ID: 11

Summary of responses:

- i. Under definitions – would this be an appropriate place to refer to the Council’s SPD on Sustainable Design?
- ii. The first of a number of incorrect descriptions of the Leeds **and** Liverpool Canal in para 2 of the waterways section (p39)

- iii. Town & village centres bullet points (p43) suggests promoting the use of 'colour' this could be taken to mean any colour, anywhere which would be in contradiction of the Council's own conservation policies. Suggest it's changed to 'appropriate colour'.
- iv. Urban terraces – the difficult issue of location of bins, whilst we support the need for new developments including bin stores, if at the front of houses this means potentially smelly bins near the front door. Also if kitchens are at the rear this is less convenient for the resident. Should this not be looked at on a case by case basis?

Council Response:

- A reference to the Sustainable Design SPD has been added to the Policy and Guidance section (p14-15).
- Corrections in relation to the Leeds **and** Liverpool Canal have been made to pages 39, 66, 78.
- Change made re 'appropriate colour' on p43
- Re: Bins. The approach set out in the Guide favours locating bins to the front of properties on urban terraces. It is considered this will be more convenient for residents (the Guide encourages kitchens to be located to the front of properties – Topic 3.2) as well as for waste collection, and it avoids security issues with shared rear pathways. Designed well bin stores can help support the character of the scheme.

Recommended Changes:

<p>(1)</p> <p>WATERWAYS</p> <p>Bradford's waterways are a unique feature of the district's landscape and built heritage. From the Leeds and Liverpool canal, the Rivers Aire and Worth, and the multitude of becks (streams), there is an opportunity for waterways to contribute even more to the district's built character.</p>
<p>(2)</p> <ul style="list-style-type: none"> o promote the use of appropriate colour and planting to ensure a vibrant and inviting atmosphere
<p>POLICIES/REFS – add:</p> <p><i>Building for Life 12: 5</i></p>

1.4 Making Places for People (Page 47)

Respondent ID: 09, 11

Summary of responses:

Digital connectivity – Communication systems for the 21st century appear not to be included. While it isn't a major design consideration, it would be helpful if the guide highlighted the importance of broadband as a utility and the need to plan for its

installation in the application and development phases. Superfast broadband (30 Mbps) is likely to be minimum requirement for many households.

Council Response: Add reference to digital connectivity in topic 1.4.

Recommended Changes:

Add the following paragraph at the end of the main body of text:

Consideration should also be given to digital connectivity at planning stage to ensure that all new homes have access to high-speed internet connections. This could have many advantages, particularly for older and disabled people, with advances in telecare and smart technologies that could enable them to stay in their own home for longer in the future. It can also enable people to stay connected and involved in their communities and to participate in local activities and lifelong learning.

POLICIES/REFS – add:

Active Design: principles 2, 4

Building for Life 12: 2

1.5 Prioritise the Environment (Pages 48-49)

1.5(a) – Climate Emergency

Respondent ID: 09, 11, 12, 15, 16, 17, 22

Summary of responses:

Various respondents have commented that the Guide needs to do more to address the climate emergency including the Leeds City Region’s Climate Coalition target of net zero carbon by 2038, and the Committee on Climate Change recommendations, specifically in relation to principle 1.5 with regard to:

- i. More encouragement for renewables, e.g. ground-source heat pumps or solar panels.
- ii. Developers should submit evidence to show that their proposals prioritise the environment and are capable of achieving net zero carbon emissions by 2038, reducing by 75% by 2030.
- iii. requiring that ‘applicants *must* consider’ the recommended solutions in section 1.5.
- iv. include more about passive house building principles and how these should be applied, along with a commitment from the local authority to provide/signpost support.
- v. include a mention of zero-carbon heating, and the implications of the Future Homes Standard 2025 which precludes fossil-fuel heating in new development.
- vi. A range of solutions should be considered i.e. district heating connections in urban centres, solar thermal, electric (particularly for off-gas locations), hybrid and hydrogen ready systems.

- vii. All neighbourhoods should be self-supporting in electricity generation through local solar and wind generation. All housing should have solar panelling installed as standard.
- viii. mention 'embodied energy' in existing buildings and minimise the use of newly manufactured materials.

Council Response: A number of changes are made to address the comments in relation to the climate emergency.

- A requirement for developers to submit evidence to show how they have considered the low carbon solutions outlined in the Guide.
- More detail on how the zero carbon target and uplifting the energy efficiency of homes can be achieved including further guidance on Passive House principles.
- Identifying solutions to renewable energy which developers must consider such as connecting to district heating networks, solar panels, ground source heat pumps, direct electric and hydrogen ready systems.
- Highlighting that reusing an existing building conserves much more energy than building a new one.
- Signposting that applicants can seek further advice from the Council's Sustainability Housing Officer.

1.5(b) – Air Quality

Respondent ID: 16

Summary of responses:

- i. More attention needs to be paid to vehicle emissions as these are proving least susceptible to reduction across all the polluting sectors, and so vehicle generated trips associated with housing and neighbourhood layouts and developments need particular attention.
- ii. No housing within 50m of a trunk road should be adopted to lessen exposure of residents to road traffic related emissions.
- iii. The rather restrictive current constraint on declaring Air Quality Management Areas to where humans in residences are considered to be the only locations at which exceedances of emissions occur should be widened to include locations where humans work or shop or conduct leisure activities.
- iv. Reducing the need to travel by ensuring local proximity of services (health centres, schools, community centres, basic retail) and by permitting more mixed use in neighbourhoods such that nearby employment opportunities are enabled, should figure more prominently in the SPD.
- v. It's important that new developments are well-connected to help reduce car dependency.

Council Response:

- Section 1.5 sets out the approach to reducing vehicle emissions. This includes prioritising public transport and active travel, integrating trees and planting within streets and open spaces, incorporating infrastructure to support ultra-low emission vehicles (including EV charging), and ensuring everyday amenities and services are within reasonable walking distance for

residents. This is supported by sections 2.3 Movement, 2.4 Green Streets and 2.15 Parking.

- The guide does not set exclusion zones for new housing development (e.g. within 50m of a trunk road). It does require an air quality survey for proposed schemes to provide clear information on the extent of air quality issues, the suitability of the site for development, and whether extensive mitigation is needed.
- Defining locations for Air Quality Management Areas is beyond the scope of the Design Guide SPD.
- It is noted that the SPD could go further in encouraging more mixed-use, well-connected neighbourhoods with easy access to everyday services – changes are proposed to address this.

1.5(c) – Scope of Topic

Respondent ID: 11, 12

Summary of responses:

- This section relates to the natural environment in the main and should be about the entire environment including the built environment.
- air quality and low-carbon development are extremely important priorities but water management and biodiversity should be highlighted as equally important, and advocate the following rewording:
“Applicants must demonstrate how their proposal is prioritising the environment, with a particular focus on air quality, low-carbon development, biodiversity gain and sustainable water management as part of the scheme objectives”

Council Response:

It is agreed that there are other also very important issues when it comes to prioritising the environment. However, it is felt important that this section of the Guide should deal specifically with air quality and low carbon development issues in order to properly address them. Cross-reference is made on page 48 to other related sections.

Recommended Changes to topic 1.5:

(1)

New development provides the opportunity to make a positive impact on the site, the immediate context, and residents. Bradford District **Council** has committed to **the Leeds City Region’s net zero carbon target by 2038 and to** improving air quality and addressing climate change by prioritising low carbon development, (as set out in Air Quality & Emissions: Technical Planning Guidance and West Yorkshire Low Emissions Strategy 2016 to 2021). Applicants must therefore demonstrate how their proposal supports these strategies and guidance.

(2)

- o Ensure that **new developments are well connected and that** everyday amenities and services, e.g. a convenience store, schools, **nursery, public open spaces, all age play space, health and community facilities, and**

local employment opportunities are located within reasonable walking distance for all residents.

Appendix 3 of the Core Strategy sets the recommended walking distances to local facilities.

(3)

For example, applicants should also consider: **Applicants should submit evidence to show how their proposals prioritise the environment and how they have considered and incorporated low carbon solutions such as:**

- Modular and/or off-site construction methods
- **Opportunities for re-using existing buildings on the site**
- Opportunities for re-use of any existing site materials, as well as generally minimising construction waste
- Employing local labour and using local materials to minimise travel
- **Connecting to District Heating Networks in urban centres**
- **Alternatives to gas central heating including ground source heat pumps, solar thermal, direct electric, hybrid and hydrogen ready systems**
- **Energy efficiency of building fabric (see also Topic 3.9 and Passive House case study below)**
- Opportunities for on-site renewable energy production **e.g. solar panels**

The Council's Environmental Health and Sustainability Housing officers can provide further advice on air quality and low carbon development.

Case Study – add more detail on Passive House principles

POLICIES/REFS – add:

Core Strategy: SC2, TR1, TR3, TR5, **HO9**, EN8, **Appendix 3**

Page 52

Respondent ID: 09

Summary of responses: the case study photographs could show more schemes from Bradford, the city region or even the North. Some of the images that there are of Bradford (Greengates p28, Haworth p52, Manningham p80) could also perhaps be replaced with better examples.

Council Response: Some images are from a public photo competition run in partnership with Bradford Civic Society and it is felt important to retain these within the document. However this does not include the photo of Haworth on page 52 which is replaced by an image of new development at New Bolton Woods, Bradford.

Additional images from schemes in Bradford District (pages 63 and 69) and the wider region (pages 112-113) are included in the final published version of the guide.

Recommended Changes:

Replace photograph of Haworth on p52 with a more relevant image.

2.2 Density and Scale (Page 54)

Respondent ID: 09, 11, 16

Summary of responses:

- i. Higher density development should be sought around public transport hubs.
- ii. Should the council not be providing guidance on specific densities?
- iii. Re: large developments making contributions for community facilities – it should read ‘will’ be required rather than ‘may’ be required.

Council Response: Changes are made to address the points about public transport hubs and community facility contributions.

With regard to providing guidance on specific densities this was considered but it was felt that to do it in a meaningful way would require a much wider restructuring/expansion of the document. The Essex Design Guide provides a good example. It has different sections for different densities with specific rules and guidelines for each. The Bradford guide has taken a different approach, it focuses very much on the process of design along with a series of principles to consider, of which density is one, to help find the best solution on a site by site basis. It is felt on balance that this is the best approach given the diverse nature of the District in terms of its density, character, communities and market areas.

Recommended Changes:

(1)

PRINCIPLE 2.2

Proposals should be at an appropriate scale and density in relation to the local and wider area, and to national and local policy requirements aimed at increasing densities at sites **around public transport hubs/routes and local facilities** where public transport and facilities can accommodate them.

(2)

Large developments of higher density ~~may be required~~ **will be expected** to provide or contribute towards community facilities to support the increased population.

2.3 Movement (Pages 56-57)

2.3(a) – Cycling issues

Respondent ID: 06, 10, 15, 16 17

Summary of responses:

There is support for the general aims regarding cycling but many respondents thought the guide should go further in relation to:

- i. Segregated cycle paths from roads and pedestrian paths.
- ii. Cycle infrastructure should be commensurable with the high quality found elsewhere in continental Europe (e.g. Copenhagen), with enforceable minimum standards.
- iii. Cycle infrastructure should be prioritised over infrastructure for motor vehicles. For example, cycle paths should take priority over space allocated to on-street parking for motor vehicles. At road junctions, the safety and convenience of cyclists should take priority over that of motor vehicles.
- iv. Introduction of shorter cuts for cyclists (and walkers) only;
- v. Cycle parking at all likely destinations including local shops, schools and workplaces;
- vi. Cycle signage;
- vii. Developing a coherent interconnected network of cycle routes;
- viii. Cycle storage to be conveniently provided inside all new dwellings
- ix. No mention is made of the increasingly popular electric bike.

Council Response:

- For higher trafficked connecting streets the Council will seek segregated cycle lanes but for more local residential streets the intention is that the street space will be shared but with a requirement of making safe, people and cycle friendly streets which limit speeds to 20mph.
- The guide does seek to prioritise cycling over motor vehicles. Further wording will be added to emphasise this.
- The guide does require the provision of cycle parking for each new dwelling (see sections 2.15 and 3.3) but as it is principally concerned with the design of homes it does not make similar provision for other destinations e.g. shops, schools, workplaces. The Local Plan Core Strategy sets cycle parking standards for these types of destination.
- Similarly it is beyond the scope of this document to set out the local network of cycle routes (that is the role of other documents such as the Bradford Cycle Strategy and the Bradford Local Cycling and Walking Infrastructure Plan) but it does seek to ensure that new routes are interconnected.
- No special provision is made in the guide for electric bikes. The guidance on cycle routes and cycle parking applies equally to all types of bikes.
- Further detailed guidance on the design of cycle paths and infrastructure will be set out in the forthcoming Bradford Street Design Guide.

2.3(b) – public transport issues

Respondent ID: 16, 09

Summary of responses – public transport:

- i. Much greater attention is required to enabling access and passage through housing areas for bus or rail or mass transit services on routes restricted to their exclusive use and the total restriction of obstacles such as on-street

vehicle parking. Public transport finds it uneconomic and infeasible to serve cul-de-sac type developments even when they are well over 200 dwelling units.

- ii. The guide could reference recent guidance publications on public transport by the Chartered Institution of Highways & Transportation (CIHT).

Council response:

The Guide seeks to encourage public transport use by creating connected places and avoiding cul-de-sac style layouts.

With regard to linking public transport with new developments two other forthcoming documents are also relevant:

- Bradford Street Design Guide – this will set out detailed guidance for the design of different types of streets including ‘connector streets’ capable of accommodating buses.
- Bradford Allocations Development Plan Document – this will make the link between proposed locations for new residential development and existing/future public transport provision to ensure integrated, sustainable development.

References to the CIHT documents will be added in the Further Reading section of the guide.

2.3(c) – transport interchanges

Respondent ID: 16

Summary of responses:

- i. The layout and design of housing, mixed use and neighbourhoods needs to encourage the use of active travel modes (walking and cycling) for local journeys of under 3km, and the interchange to public transport (bus, light rail transit, heavy rail) at the earliest opportunity for longer (>3km) journeys. This requires secure cycle parking at bus stops and bus/rail stations. Have a look at any Japanese railway station to see what is feasible!
- ii. Secure shelters at all bus stops and bus/rail stations are required.
- iii. It requires provision of real-time travel information at all bus stops and bus/rail stations and inside all new dwelling developments, and the mandatory provision of such information at local shopping and service centres, however small.
- iv. Substantial vehicle parking may be required close to some bus/rail stations where such stations are beyond normal walking distances (1km to rail stations) and always for the mobility impaired.

Council response:

The focus of the guide is the design of new housing development and how this can contribute to creating successful neighbourhoods. This includes designing layouts to encourage walking and cycling for local journeys and requiring space to store bikes for all new homes.

It is beyond the scope of this document to provide detailed guidance/requirements on public transport provision and station design however further wording is proposed to highlight the importance of considering through the design process of how residents will be able to access public transport.

2.3(d) - Vehicles

Respondent ID: 10, 11

Summary of responses – vehicles:

- i. There should be a policy of reducing road deaths, air pollution and congestion through reducing the number of motor vehicles on the road.
- ii. Good to see reference to ‘Manual for Streets’
- iii. The section on ‘Vehicles’ refers to 20mph restriction in new residential areas which we would support but not just in the City Centre and for new developments it should extend to other communities as well.

Council response:

As a supplementary planning document the Design Guide can’t set policies (e.g. reducing number of vehicles on the road) but it does include principles which seek to address these issues, through for instance creating safe streets with 20mph speed limits, reducing air pollution through greenspace and landscape, and including measures to prioritise walking and cycling.

The 20mph speed restriction applies to all new housing development across the District.

Recommended Changes to Topic 2.3:

<p>(1)</p> <ul style="list-style-type: none"> • integrate with existing adjoining streets and paths, or link with the layout of any neighbouring site that is being developed
<p>(2)</p> <p>The case study on Banbury Bradbury Place on page 89...</p>
<p>(3)</p> <p>Encourage cycling Cycling should be given priority by ensuring that cycle routes are designed into the movement strategy from the start. They should be linked to the existing network of cycling routes and seek to enhance it. Segregated cycle lanes will be sought on main connector streets, whilst local residential streets should be designed to give cyclists priority over motor vehicles. This can be achieved by introducing direct, connecting routes for cyclists (and pedestrians) only, and also by designing junctions based on the ease of movement and comfort of cyclists and pedestrians rather than the needs of the car. Cycle parking and storage must be provided (see Topic 2.15 Parking and 3.3 Storage).</p> <p>Public transport access or extension New residential and mixed-use developments should be designed so that direct pedestrian access is provided</p>

from the development to existing bus or rail stops, which should be no more than 400m **or 800m respectively** between dwelling and stop.

Consideration should be given at an early stage to how features such as new bus shelters can successfully be integrated on developments as well as how residents will be able to conveniently access existing or planned bus/rail/mass transit stops by foot or cycle. For larger developments, the potential to extend public transport routes should be included where possible. This should be discussed with planning officers to determine how it will be delivered.

(4)

...and the **forthcoming** Bradford Street Design Guide.

POLICIES/REFS – rewrite as follows:

Bradford Core Strategy: TR1, TR3, TR5, DS3/4

City Centre AAP: M1, M3-4

Shipley AAP: ST1- ST6

The forthcoming Bradford Street Design Guide

Bradford Map of Paths / LCWIP

NPPF: paras 104, 127

Active Design: 2, 3

Building for Life 12: 1, 3

Add an additional image illustrating active travel (subject to sufficient space being available)

2.4 Green Streets (Page 59)

Respondent ID: 06, 11

Summary of responses:

- i. Comments are generally in support – Green Streets is very positive statement – ‘streets not roads’.
- ii. Designs should avoid planting of inappropriate shrubs/trees close to pedestrian and cycle paths to avoid intrusive and restrictive vegetation and maintenance costs as the place matures. Could there be some guidance on species to be avoided re blocking sight lines and narrowing paths?

Council Response: It is agreed that a balance needs to be struck between greening streets with trees and all the benefits they bring but not to the detriment of other street functions and the movement/safety of pedestrians and cyclists.

The Council’s Landscape Architects provide advice on schemes on a site by site basis and further detailed guidance on street trees will be set out in the Council’s forthcoming Street Design Guide.

Recommended Changes:

(1)

...and local guidance, such as Bradford's **forthcoming** street design guide.

(2)

Proposals will range from planting mature trees in primary streets to including shrubs and planters in private front gardens in residential areas. **The Council's Landscape Architects can provide advice on this.**

POLICIES/REFS – rewrite as follows:

Bradford Core Strategy: TR1, TR3, TR5, DS3/4

City Centre AAP: M1, M3-4

Shipley AAP: ST1- ST6

The forthcoming Bradford Street Design Guide

TfL's Healthy Streets

NPPF: paras 104, 127, and 181

Active Design: princ. 5, 6

Building for Life 12: Q9

2.5 Safe and Characterful Streets (Page 63)

Respondent ID: 11

Summary of responses: positive to see 'Secured by Design' mentioned, and good to see some prominence to 'boundary treatments' so often ignored in developments. 'Character' needs to emphasise the value of heritage

Council Response: Section 2.5 'Safe and Characterful Streets' is more about creating pleasant, attractive streets that are well defined and animated by the buildings and that clearly distinguish between private and public areas.

Other sections (particularly 1.3 'Responding to Character') specifically address the importance of responding to the rich and diverse built heritage of the District.

Recommended Changes:

POLICIES/REFS – rewrite as follows:

Core Strategy: DS2-DS5

The forthcoming Bradford Street Design Guide

TfL's Healthy Streets

Secured by Design

NPPF: paras 91,108, 110, 127

Active Design: princ 3, 6

Building for Life 12: 7, 11

2.6 Open Space (Page 65)

Respondent ID: 04

Summary of responses: Great to see green spaces featured in this.

Council Response: Supporting comment so no change but a reference to green infrastructure is added in response to comments under General Issues (f) – Addressing the Climate Emergency.

Recommended Changes:

- form part of a wider network of open spaces, **green infrastructure** and streets

POLICIES/REFS – add:

Active Design: principles 5, 6

Building for Life 12: 11

2.7 Water and Drainage (Pages 66-67)

2.7(a) – flooding issues

Respondent ID: 11, 17

Summary of responses:

- i. A much wider view on infrastructure is needed, flooding only receiving one general reference. Other infrastructure is not covered.
- ii. There is mention in the SPD regarding the use of SUDs and Drainage, however there is no obvious mention of fluvial mitigation.
This is an Ideal opportunity for Bradford to install some locally agreed mitigation principles into either a design guide such as this or as a supplementary document that can be linked to both the Design Guide and the SFRA.
Leeds have adopted and implemented such a document and Bradford could consider adopting something similar. Such a document sets out the principle we would expect to be followed by developers on developments at flood risk and covers both surface water (from the LPA) and Fluvial (from the EA).

Council Response:

It is not proposed to include technical mitigation principles within the document as principally this is a design guide but text will be added (see below) to make further reference to all types of flooding and the need for early engagement with the Environment Agency.

2.7(b) – water management issues

Respondent ID: 16, 11

Summary of responses:

- i. The management of water requires provision in all housing and neighbourhood developments firstly for water recycling within the dwellings (eg of grey water as done in many water-scarce areas around the world), and secondly for local infiltration into the adjacent land rather than run-off into watercourses.
- ii. the pictures are misleading as it could infer the L & L canal is available as a drainage channel.

Council Response:

The Guide includes a section on Water and Drainage (2.7) which requires sustainable drainage schemes including the conservation of water and minimising potable water consumption through rainwater collection for garden irrigation and installing efficient toilets and appliances.

Section 2.7 deals both with the importance of sustainable drainage and with using watercourses as a focus for amenity promoting health and active travel. The pictures show examples of each. However, the comments about the canal picture are noted and it is intended to replace it with a more relevant image in the final publication version.

Recommended Changes to Topic 2.7:

Add the following text on p67 before 'Water and Amenity':

Suitable flood mitigation measures will be required for all developments that are at risk from any/all sources of flooding. These should be considered as an integral element in shaping the design and early engagement is strongly encouraged with both the Lead Local Flood Authority (LLFA) and the Environment Agency at pre-application stage to establish principles.

Replace photograph on p66 of the Leeds and Liverpool Canal with a more relevant image.

2.8 Landscape (Pages 68-69)

Respondent ID: 09

Summary of responses: The guide could be stronger on the importance of protecting mature trees on the site. Newly planted trees take decades to have the same benefit in terms of carbon and particulate absorption. The replacement rate is given as 2 for 1, which is lower than Leeds' requirement of 3 for 1. If removing trees is absolutely unavoidable then 3 for 1 should be considered.

Council Response: These comments have been taken on board and with input from the Council's Trees Team a number of changes are made to Principle 2.8 to better address the issue of trees on developments. These includes changes to the wording of the principle and the supporting text, and replacing the case study.

Recommended Changes:

(1)

PRINCIPLE 2.8

A landscape strategy must be set out for every housing development proposal. The strategy should include a variety of landscape features, **including trees**, with a clear plan for both the private and public realms, and a supporting management and maintenance strategy.

(2)

3. Retain existing mature landscape features.

Development proposals and the open spaces within them should be designed around the existing high quality landscape features on the site, particularly the areas that support existing biodiversity, wildlife habitats and protected species. See Topic 2.9, Biodiversity.

Existing mature trees on the site should be retained and integrated within public areas on the development. Proper consideration should be given to engineering and tree protection at design stage to ensure solutions which are deliverable and workable.

4. Increase the number of trees

New trees should be planted on all new developments in both public and private areas. They should have the space to mature and contribute to the development of local wildlife habitats in the future. ***When assessing the green credentials of a scheme the Council will place much more emphasis on trees planted in public areas as generally they are more successful in achieving long term benefits than those in private amenity spaces.*** If tree felling is necessary or appropriate, replacements must be planted and maintained in their place, providing at least one new tree for every tree lost. If young trees replace mature trees, they should be planted at a ratio of two trees for every tree lost. ***Where existing trees have been identified as suitable for removal at pre-application stage, or where they have been pre-emptively felled for development, then replacements should be planted within public areas of the development at a ratio of three new trees for every tree lost.***

~~Trees should be discussed with the Council's tree officer and technical guidance sought for design details such as tree pits.~~ ***Trees should be discussed with the Council's Tree Officers at an early stage in the planning process.***

Delete and replace case study box on page 66

POLICIES/REFS – add: ***Building for Life 12: Q6***

2.9 Biodiversity (Page 71)

Respondent ID: 02, 11, 12

Summary of responses: All the comments support the emphasis on biodiversity in the document – the reasons include:

- i. the requirement for protection of and implementation of net gain for biodiversity in new developments
- ii. the encouragement to implement green roofs and living walls, green boundary treatments, open space and tree planting and precautions for species such as hedgehogs, bats and amphibians.
- iii. The consideration of how design should meet more than just its functional target and also provide areas for biodiversity gain and amenity.
- iv. the consideration of habitat networks and the recognition of the importance of this connectivity across the city.
- v. the guidance will bring obvious benefits to wildlife as well as encouraging residents to become interested in their local flora and fauna.
- vi. the importance of maintenance and management following the initial implementation being stressed in the guide to ensure that the original good intentions will not be lost.

Recommended Changes: None, except for a change to the cartoon quote on page 71 as it is no longer appropriate following the changes made to section 2 regarding trees.

Cartoon quote (p71):

~~“THEY SEEM TO HAVE PLANTED AT LEAST TWO NEW TREES FOR EVERY ONE THEY HAD TO TAKE OUT”~~ **“IT’S SO RELAXING SITTING OUT IN THE GARDEN, THERE’S SO MUCH NATURE HERE”**

2.10 Play (Page 73)

Respondent ID: 04

Summary of responses: Great to see play featured in this.

Council Response: Supporting comment.

Recommended Changes:

POLICIES/REFS – add:

Active Design: principles 1 and 5

2.11 Housing Mix (Page 75)

Respondent ID: 09, 11, 16, 20

Summary of responses:

- i. The document could be more explicit about affordable housing being integrated, to avoid segregation S106 properties from owner occupied homes.
- ii. Housing Mix – refers to ‘meeting local policy’ without referring specifically to which policy.
- iii. Higher proportions of affordable housing (up to 60%) of total developments should be sought in areas closer to bus and light rail transit and heavy rail

station stops. The affordable housing proportion in all homes and neighbourhood developments needs to be set overall at much higher levels than currently in the CBMDC area.

- iv. Supporting comment – The principle of adaptability expressed in Topic 2.11 Housing mix and later at 3.2 internal layouts is vital.

Council Response: changes are made in response to i and ii (see below). With regard to iii, as a supplementary planning document the design guide cannot set requirements for proportions of affordable housing – this is dealt with in the statutory development plan – the Core Strategy (Policy HO8) – in accordance with government policy.

Recommended Changes:

(1)

The mix and tenure of new homes should meet ~~local policy~~ **Core Strategy Policy HO8** and support the Council in providing a mix of affordable housing.

(2)

Affordable homes: schemes that include a mix of housing tenures should ensure that the scheme is designed to be tenure blind **and that affordable homes are integrated and not segregated from the rest of the development.** This must include giving residents of affordable homes equal access to **public spaces, children’s play areas,** local facilities, amenities and infrastructure.

POLICIES/REFS – add:

Building for Life 12: Q4

2.12 Topography and Ground Conditions (Page 77)

Recommended Changes (to address typing error):

POLICIES/REFS – amend:

GIRA **CIRIA**

2.13 Roofs and Building Forms (Pages 78-79)

Respondent ID: 09, 11

Recommended Changes (in response to comments raised under pages 14 and 39):

Repeated roof forms in Apperley ~~Green~~ **Bridge** give the development character and an interesting frontage to the Leeds **and** Liverpool Canal

POLICIES/REFS – add:

Building for Life 12: Q5

2.14 Key Buildings and Corners (Page 81)

Recommended Changes:

POLICIES/REFS – add:

Building for Life 12: Q7 and 8

2.15 Parking (Pages 82-83)

2.15(a) – amount and type of parking

Respondent ID: 06, 08, 10, 15, 16

Summary of responses:

- i. The amount of parking spaces is quoted but not size. There is an increasing problem with occupational ‘white van’ parking leading to clutter of streets and compromising access. Some provision could be made perhaps subject to charge.
- ii. Concern with the number of parking spaces that are proposed per dwelling being set at 1.5; It is felt this is insufficient for Bradford where with a young population the rite of passage seems to be for most people to get a car at the earliest opportunity and with a house being built to last a lifetime the typical family with 2 teenage children may have 4 cars for a number of years and with only 1.5 spaces provided one has to wonder where the other 2.5 cars are to go.
- iii. On-street parking for motor vehicles should not be included as a necessity within town/city centre planning.
- iv. Why not be truly radical, and actively discouraging car driving by reducing considerably, the number of parking places in residential areas?
- v. A whole battery of parking policies need to be adopted in the SPD including reduction of parking space provision, area-wide 24-hour all days bans on on-street parking, tight restrictions on long-stay parking provision and costly charges for its use, resident permit parking schemes that are enforced with no renting of permits permitted, and off-street provision of parking for delivery and larger vehicles.

Council Response:

It is acknowledged that the issue of parking is one of the biggest challenges facing housing design today. The SPD does set out a number of solutions to ensure that parking is accommodated for adequately in ways that support the street scene rather than clutter it. The guide also includes a number of measures aimed at getting people out of their cars by making walking, cycling and public transport more attractive options.

Introducing additional requirements such as charging specific types of vehicles to park or introducing bans is beyond the scope of a design guide document such as this.

The guide quotes the parking standards (1.5 spaces per dwelling) from the Core Strategy. Again it is beyond the remit of this document to change this but the issue of parking standards is being currently being considered as part of a Partial Review of the Core Strategy.

Studies (e.g. Space to Park) have shown that just reducing parking spaces where people live tends to be counter productive and leads to problems with cars parking where they shouldn't e.g. on pavements. The SPD aims to ensure that schemes are designed so that parking areas can be used for other purposes when not in use or if car use reduces in the future.

With regard to (iii) and city centre parking the Council sets no minimum standard and seeks to minimise the number of spaces in the city and town centres. The guide advocates basement parking for new city centre schemes.

2.15(b) – designing for car parking

Respondent ID: 09

Summary of responses:

- i. The promotion of unallocated parking spaces, the ideas about parking spaces doubling up for other uses when not in use or in the future, and the discouragement of 'inappropriate' parking is positive.
- ii. It would be beneficial to have a couple of diagrammatic plans showing how inappropriate parking can be designed out – for instance using street furniture or landscaping to block parking on pavements, or having inset parking bays parallel to the street so that drivers are less likely to mount the pavement to protect their car from passing vehicles.
- iii. The advice on parking for narrow terraced houses needs to be more detailed with some caveats to avoid an unattractive frontage – for instance, not directly abutting the house but with a landscaped buffer of at least 800mm, and no more than 4 spaces in a row. Building for Life asks for 50:50 ratio of soft:hard landscaping: 'Where parking is positioned to the front of the property, ensure that at least an equal amount of the frontage is allocated to an enclosed, landscaped front garden as it is for parking to reduce vehicle domination'

Council Response: New wording is added to address point iii, and in response to ii reference is made to the axonometric sketch drawing on page 50 which shows a range of parking types.

2.15(c) – EV charging

Respondent ID: 09

Summary of responses: Parking standards refer to the required number of charging points. However there's no information on integration, electrical connection and specification – best practice suggests 32A 7kW charger on a spate electrical spur.

Council Response: A separate guide 'Air Quality & Emissions: Technical Planning Guidance for West Yorkshire' (referred to in section 1.5) includes an Appendix which sets out the specification for electric vehicle charging.

Recommended Changes to Topic 2.15 Parking:

(1)

PRINCIPLE 2.15

Provide cycle and car parking that is safe and functional, and that neither constrains pedestrian movement nor dominates the street scene.

Parking must be successfully integrated within the dwelling curtilage and/or the public realm, adhering to ~~the~~ **any** technical requirements ~~set out in the Bradford Street Design Guide.~~

The table opposite provides a summary of the different types of parking required for new homes and neighbourhood schemes, based on the Core Strategy requirements and additional guidelines in this section. This principle must be read in conjunction with the **forthcoming** Bradford Street Design Guide, which **will** provides additional technical requirements.

(2)

- avoid locating parking spaces and garages in prominent locations such as street corners or where they terminate vistas down streets
- ***For car parking in front of the house ensure a buffer is included so that parked vehicles don't directly abut the house, avoid having more than 4 frontage spaces in a row, and allow for at least an equal amount of the frontage to be allocated for an enclosed, landscaped front garden to help reduce vehicle domination (as recommended in Building for Life 12).***
- ***Using appropriate street furniture, landscape and boundary treatments to prevent cars from parking on pavements and grassed areas.***
- ***Allowing enough street width to accommodate inset parking bays parallel to the street.***

The drawing on page 50 shows how a range of parking types can be accommodated within a development.

As the future of transport is continuously evolving, designing parking areas to be attractive and flexible will ensure their ability to adapt and to serve resident's needs.

POLICIES/REFS – add:

The forthcoming Bradford Street Design Guide SPD

Building for Life 12: Q10

Active Design: principle 7

(if there is room to do so)

2.16 Waste (Page 86)

Respondent ID: 21

Summary of responses: p86 states that householders have an option for a 240L bin for Garden Waste which is a chargeable service, could just add “which is an annual subscription service” to reflect this.

Council Response: Change made.

Recommended Change:

As set out in Bradford’s waste and recycling policy, each household should have two 240-litre bins, one for general waste and one for recycling. There is also an option for households to have a third 240-litre bin for garden waste (**which is an annual subscription service**).

POLICIES/REFS – add:

Building for Life 12: Q12

2.17 Making Inclusive Places (Pages 88-89)

2.17(a) – accessible housing standards

Respondent ID: 03, 08, 13, 20

Summary of responses:

A number of comments have been made in relation to the inclusion of Accessible housing standards of 90% Category M4(2) (Accessible & Adaptable Dwellings) and 10% Category M4(3) (Wheelchair User Accessible Dwellings) in the guide.

Supporting comments:

- i. Strongly advocate the guidance on principle 2.17, in particular to require 90% of new homes to be built to the standard set out in Building Regulations M4(2) Category 2, accessible and adaptable homes, and the remaining 10% to M4(3) Category 3, Wheelchair user dwellings.
- ii. Provision of accessible homes can transform the lives of people helping them to stay safe, healthy, active and independent. It can help reduce pressure on public services and also help to address the significant deficit of suitable accessible housing available.
- iii. The wording of the principle could be stronger though with a greater emphasis on Part M as being the minimum standard acceptable. It should be a requirement for the applicant to show in their Design and Access Statement how they intend to meet these requirements.

Objecting comments:

- iv. These are policy requirements that have financial implications yet to be tested via the Local Plan process and as such can carry no weight.
- v. An SPD (as defined in the NPPF) is a supporting document which should not repeat policy requirements yet to undergo examination.

Council Response:

Policy HO9 in the adopted Core Strategy states that new development should provide a proportion of accessible homes but it does not define what this proportion should be. The supporting text to Policy HO9 (in paragraph 5.3.150) states the Council's intention to undertake further detailed work to inform this and that "*The Housing Design Guide will take account of this work and provide further guidance in relation to the proportion of accessible, adaptable and wheelchair user dwellings required in advance of any adopted policy in the Local Plan.*"

In accordance with this the Council has commissioned further detailed work (a Housing Needs & Viability Study by David Lock Associates) which recommends the requirements of 90% M4(2) & 10% M4(3).

Therefore it is considered that the Council is justified in referencing these proportions in the guide. However the Council is also aware of recent case law relevant to this issue, (e.g. William Davis & others v Charnwood BC (2018)), which support the view that policy requirements such as these should not be included in an SPD.

In response it is proposed to amend the wording so that the guide still provides guidance on the recommended proportion of accessible homes but without making it a requirement. This will identify the intended direction of travel of policy in advance of the outcome of the Partial Review of the Core Strategy which will formally address this issue through planning policy.

2.17(b) – local evidence for accessible homes

Respondent ID: 03, 13

Summary of responses:

- i. Bradford Council are urged to undertake a similar piece of work to the Housing Standards Viability Study commissioned by the GLA to inform policy in the London Plan.
- ii. The requirement for 10% of new dwellings to be built to wheelchair accessible standards. is contrary to the Council's own evidence, the Strategic Housing Market Assessment (SHMA, 2019), which recommends a 4% requirement.
- iii. Viability evidence is not available.

Council Response:

The Council commissioned a research study by David Lock Associates (DLA) in 2016 looking into the local need and viability of applying accessible housing standards in the District in accordance with national planning policy and guidance.

The study recommends that there is a need in the District for 90% of new homes to be built to Cat M4(2) and 10% to Cat M4(3). It finds that in the majority of cases this

would be viable and identifies the instances where viability would be a problem (in terms of market areas and types of housing).

The DLA study has informed the requirements set out in both the SPD and in the Core Strategy Partial Review (CSPR) which was published concurrently. The study forms part of the evidence base for the CSPR but it appears that it was not published with the rest of the evidence base documents – it will now be made available for review and comment.

The SHMA 2019 was published in draft form and is based mainly on demographic data. The recommendations in the 2016 DLA Study took reference from a wider range of locally specific evidence particular to this issue and concluded that there was a need for 10% of new homes to be built to wheelchair accessible standards and that this was viable in the majority of cases.

2.17(c) – other inclusive place issues

Respondent ID: 08, 09, 11

Summary of responses:

- i. Surprised and encouraged that a number of matters that the Mobility Planning Group members suggested to the consultants at the stakeholder events have made their way into the final draft of the document, an example being the introduction of benches and seating along the pavement to ease those of us whom need or want to take a break whilst walking.
- ii. It would be good to see more of a definition of the word “access” as from experience as a member of Bradford’s Planning, Highways, Access Forum (PHAF) applicants tend to use this word to mean specifically getting on to a site whereas the PHAF membership use the word “access” more globally to mean not only access to the site but also moving around the site and getting into and then around any building on the site.
- iii. The concept of inclusive places should thread through the whole document and it might be worth considering whether the text from this section is should be distributed throughout
- iv. It would be beneficial to mention lighting in the section on inclusive places, to help more vulnerable people feel safer after dark.
- v. Should include mention of younger people and affordable housing residents, especially bearing in mind the recent segregated play areas issue in a London development.
- vi. The case study photo doesn’t demonstrate the scheme well. It’s not clear that the featured building is the one in the background and not the older ones in the foreground, which are quite mediocre and not well-lit. Also, the name is wrong – it’s Bradbury, not Banbury
- vii. Inclusive places refers correctly to the need not to create ‘Street clutter’. Can Bradford expect the developer to achieve a standard when it has no policy on for its own departments?

Council Response:

- A definition of 'access' and also 'inclusive' will be added to the guide (see below).
- An earlier version of the guide did not have a separate inclusive places section but following the workshops it was decided that this was a key issue which warranted its own section.
- Wording is added in relation to lighting and safety.
- Wording has been added elsewhere in the document addressing the comments on affordable housing and segregated play areas – see section 2.11.
- The comments regarding the photo are noted . This image is also referred to in section 2.3 (page 56) with regard to movement issues. The Council will explore whether a better, alternative image of the scheme exists for inclusion in the final version of the guide, and the name of the street will be corrected.
- The Council is developing a Bradford Street Design Guide which will provide more detailed guidance on the provision of street furniture and avoidance of street clutter.

Recommended Changes to Topic 2.17:

(1)

~~Ten per cent of proposed homes should be designed to meet the standards of Building Regulations M4(3): Category 3, Wheelchair user dwellings.~~

~~The remaining 90 per cent should be designed to meet the standards of Building Regulations M4(2): Category 2, Accessible and adaptable dwellings. It is acknowledged that it is not always viable to achieve level access to all homes, so in this case all elements of Category 2 should be achieved except that one.~~

Policy HO9 in the Core Strategy requires that larger sites should include a proportion of new homes which are designed to be accessible and adaptable, including for older and disabled people. It states that further guidance on the proportion of accessible, adaptable and wheelchair user dwellings will be provided in this design guide.

The Council has undertaken further research which recommends that 10% of new homes are designed to meet Building Regulations M4(3) Category 3: 'Wheelchair user dwellings', and that the remaining 90% are designed to meet Building Regulations M4(2) Category 2: 'Accessible and adaptable dwellings'.

This sets out the intended direction of travel of policy in advance of the outcome of the review of the Core Strategy which will formally address this issue through planning policy.

In accordance with Policy HO9 applicants should submit information identifying which dwellings on site will meet categories M4(2) and M4(3).

(2)

- ...is an important part of life for those who are less able.
- ***Good quality street lighting should be provided on key walking routes to***

help vulnerable people feel safer after dark.

Insert a definitions box on p89 with the following:

Inclusive places *Places which are designed to work better for everyone whether a building, a street, a public space or a transport route. They respond to the diversity of people who want to use them and are welcoming, easy and convenient to use regardless of age, ability, gender or community.*

Access *How everyone can get to and move through a place on equal terms. This includes consideration of access points, routes, road layouts and public transport provision.*

Case Study: ~~Banbury~~ **Bradbury** Place, Andover

POLICIES/REFS – add:

Active Design: principles 1, 5, 8

3.2 Internal Layout (Page 94)

3.2(a) – Parker Morris standards

Respondent ID: 14

Summary of responses:

The current legacy of new homes leaves much to be desired with obsolescence already built-in before they are occupied because of minimum internal spaces and no space for storage. Extensions to dwellings should not be needed if well designed for their intended purpose.

As a former town planner, I remember the days of Parker Morris standards when applied to new Council houses. They set high standards of internal space when compared to the product built today by private housebuilders.

Council Response:

The modern day equivalent of the Parker Morris standards is the government's Nationally Described Space Standards (NDSS) published in 2015. These are optional for Council's to use dependent on local need and viability. The Guide makes reference to the NDSS in section 3.2.

3.2(b) – Nationally Described Space Standards (NDSS)

Respondent ID: 13

Summary of responses:

Objection to the requirement for new homes to meet the Nationally Described Space Standard (NDSS). It is not adopted Council policy. It is currently draft in the Core Strategy Partial Review (CSPR) Preferred Options document and has not undergone viability testing or been examined and found to be a sound policy. An SPD (as

defined in the NPPF) is a supporting document which should not repeat policy requirements yet to undergo examination.

Council Response:

The supporting text to Policy HO9 in the adopted Core Strategy states that the Council will apply the NDSS as a benchmark for assessing the suitability of new homes, and that where viable new homes should meet at least the minimum internal floor areas and that the onus will be on the applicant to demonstrate why this can't be achieved.

It also states that the Council intend to undertake further detailed work in regards to adopting the national space standard in the District in advance of any policy requirement in the Local Plan.

The reference to the NDSS in the SPD is broadly consistent with the approach set out in the adopted Core Strategy and further detailed work (the DLA study – see above) has now been undertaken.

Some amendments are made to the text to ensure the wording is in conformity with Policy HO9, both the current adopted and any subsequent future amendments to the policy.

2.17(c) - adaptability

Respondent ID: 20

Summary of responses:

The principle of adaptability expressed in Topic 3.2 internal layouts and at 2.11 Housing mix is vital.

Council Response: Supporting comment.

Recommended Changes to Topic 2.17:

PRINCIPLE 3.2

Internal layouts ~~must meet~~ **should use the** Nationally Described Space Standards **as a benchmark** and demonstrate:

1. Functionality
2. Adaptability
3. Safety and security
4. Liveability

The Nationally Described Space Standards (NDSS) provide best practice guidance on gross internal floor areas, based on the number of bedrooms and bedspaces. ~~All new homes in Bradford should comply with this.~~ **The Council will use the NDSS to assess the suitability of internal space of proposed new homes. Applicants should provide a schedule setting out the internal floor areas for each type of home. In the event that any home falls below the**

standards the applicant should provide a justification of why they cannot be met.

The Building Regulations Approved Document M 'Access to and use of buildings' also sets out standard dimensions required for accessible and adaptable dwellings (M4(2) Category 2) and wheelchair user dwellings (M4(3) Category 3). **The Council recommends** ~~new~~ schemes ~~should~~ provide 10 per cent M4(3) dwellings and 90 per cent M4(2), see Topic 2.17 Making inclusive places.

3.3 Storage (Page 99)

Recommended Changes:

POLICIES/REFS – add:

Active Design: principles 7, 8

3.5 Outdoor Space (Page 103)

Recommended Changes:

POLICIES/REFS – add:

Active Design: principles 7, 8

3.6 Privacy (Page 104)

Respondent ID: 19

Summary of responses:

Broad support for the document but concern that the amenity standard of 21m between habitable room windows may conflict with the Core Strategy Partial Review (CSPR) requirement for 35 dwellings per Ha. Rigorous testing of this should be undertaken. Consultation should also be undertaken with the Development Management team at CBMDC who for many years worked to a distance of 18 m (before adoption of the Householder SPD that reduced the distance to 17m) as they routinely accepted 30 dwellings per ha was not compatible with 21m facing distances.

Council Response:

Research studies have been undertaken on this matter on behalf of organisations such as the GLA, HCA (now Homes England) and the CPRE. These suggest that it is possible to achieve 35dpha (and more) whilst still providing good sized family homes (including detached homes) with gardens, and appropriate space between dwellings as well as meeting urban design objectives and other requirements (e.g. parking). Therefore whilst it may well be a challenge requiring skilled design input it is considered that achieving both density and providing adequate privacy should be possible.

The guide does acknowledge however that achieving typical separation distances may not always be possible in a district such as ours with its topography and often constrained sites. It sets out a range of ways on pages 104-105 in which creative design can help to mitigate this.

The Council's Development Management team have been involved throughout the preparation of the document, including on this issue. The 21m distance is greater than that set out in the Householder SPD to allow flexibility for future extensions and adaptations.

Recommended Changes: None

3.8 Materials and Details (Page 109)

Respondent ID: 11

Summary of responses: Makes no mention of 'embodied energy' in existing buildings and minimisation of the use of newly manufactured materials

Council Response: These matters are addressed in changes to 1.5 Prioritising the Environment (pages 48-49) and 3.9 Energy Efficiency (page 110).

Recommended Changes:

POLICIES/REFS – add:

Building for Life 12: Q5

3.9 Energy Efficient (Pages 110-11)

Respondent ID: 09, 11, 17

Summary of responses:

- i. Some specific Energy Efficiency targets are needed. The Planning and Energy Act allows for higher energy efficiency standards. This should be higher than building regulations (currently under review), must consider passive house standards and minimise space heating requirement, and avoid future zero carbon retrofit costs and alleviate poverty.
- ii. The UK climate change committee 2019: states "From 2025 at the latest, no new homes should be connected to the gas grid. They should instead be:
 - Heated through low carbon sources
 - Have ultra-high levels of energy efficiency alongside appropriate ventilation
 - Where possible be timber framed"
- iii. Include a mention of, and the implications of the Future Homes Standard 2025 which precludes fossil-fuel heating in new development.
- iv. The SPD fails to differentiate between dealing with modern construction and the conversion of traditional solid wall buildings in terms of 'air tightness' for the former and 'ventilation' for the latter.
- v. This is a good opportunity to make sure new development is 'future proofed'

- vi. The UK Green Building Council have produced a resource pack that is designed to help enable local authorities increase the sustainability of new homes.

Council Response:

The government has recently clarified its position regarding energy efficiency standards. An update of the national Planning Practice Guidance (March 2019) states local authorities can set energy performance targets higher than current Building Regulations (up to Level 4 of the Code for Sustainable Homes) in their development plan policies.

This provision exists only until Section 43 of the Deregulation Act 2015 is enacted and the government has signalled their intention to deal with this issue through their new 'Future Homes Standard' currently out to consultation (until 7 February 2020). The standard proposes uplifting mandatory energy efficiency standards for new homes through the Building Regulations Part L up to Code Level 4 and beyond.

In any event as an SPD the Homes and Neighbourhoods Design Guide can't set policies. The purpose of an SPD, as defined in the NPPF, is to add further detail to the policies in the development plan namely SC2 and HO9 in the Core Strategy which support and encourage new homes to achieve high sustainable design standards.

However, in response to the comments, additional guidance will be provided in the SPD on how higher performance can be achieved. This will draw on guidance by the UK Green Building Council and includes:

- A case study (the Dominion scheme at Doncaster of modular homes which achieve Code level 4 and have been designed to enable upgrading to zero-carbon – identified as good practice by the UKGBC).
- Referring to the government's new 'Future Homes' Standard particularly with regard to insulation, ventilation and heating from low carbon sources.
- Considering energy efficiency principles in the reuse/retrofit of existing buildings.
- Signposting applicants to further support/advice from the Council's Sustainability Housing Officer.

Recommended Changes:

Add following text on p110:

Applicants should think long term and consider how new homes can be designed to be energy efficient and avoid expensive future zero carbon retrofit costs. The government's forthcoming Future Homes standard proposes a clear direction of travel with mandatory standards potentially being introduced in 2020 for new homes. The standard will require ultra-high levels of insulation alongside appropriate ventilation, with heating to be provided from low carbon sources and no new homes to be connected to the gas grid.

Applicants should also consider the reuse of existing buildings and the reuse/recycling of existing materials on the site as this is much more energy efficient than new construction and the manufacture and transportation of

new materials.

Where existing buildings are being reused or retrofitted consideration should be given to the difference between dealing with modern construction and the conversion of traditional solid wall buildings in terms of ‘air tightness’ for the former and ‘ventilation’ for the latter.

The Council’s Sustainability Housing Officer can provide further advice on achieving energy efficient homes.

WHY?

By designing energy-efficient developments that optimise the use of natural resources, applicants align their proposals with the Council’s strategic objectives, increasing the likelihood of a planning application succeeding.

Improving energy efficiency in our homes and in how we travel is an important means of ***addressing the climate emergency and*** improving air quality in the district.

Add case study of new modular homes at Dominion, Doncaster which achieve Code Level 4 and have been designed to easily enable future upgrades and retrofits of renewable technologies to meet the zero-carbon target (identified as good practice by the UKGBC).

Add a reference to ultra-high levels of insulation to the diagram on page 111.

POLICIES/REFS – add:

MHCLG Future Homes Standard

UK Green Building Council resource pack

Appendix 1. Linking to Policy (Pages 113-115)

Respondent ID: 01, 11, 13

Summary of responses:

- i. In the Appendix 1 Linking to Policy table on pages 114 to 115 DS4 on page 115 talks about paths should mention PROWs and there is an opportunity to include here the web links to your on-line PROW map.
- ii. It’s surprising that a major omission of this section is the listing of all current and in preparation SPD’s and of externally produced documents referred to in the text with publisher details.
- iii. Whilst the guidance within the SPD includes emerging draft CSPR policy requirements the Appendix 1 ‘Linking to Policy’ includes a table of Core Strategy policies which do not include any emerging draft CSPR requirements.

Council Response:

In response to (i) the Appendix sets out existing adopted policies and it is not possible to make additions to them through this document but an additional reference is proposed in section 2.3 to the Bradford Map of Paths.

In response to (ii) changes are made to the section on Policy and Guidance (pages 14-15) to refer to relevant SPDs and other documents. Also it is intended to include a fuller list of referred to documents in the 'Further Reading' section in the final version of the guide.

In response to (iii) the SPD supports existing adopted local plan policy – the key policies are listed in the appendix. One of these, Policy HO9, is currently subject to the Core Strategy Partial Review and reference is made in relevant sections of the document (namely 2.17 and 3.2) to highlight that the guidance should be read in conjunction with any future updates to that policy.

Recommended Changes: None.

Further Reading (Page 116)

Respondent ID: 09

Summary of responses: With reference to public transport, it may be worth signposting within the document to recent guidance from the Chartered Institution of Highways & Transportation (CIHT).

Council Response: References to the suggested CIHT docs are added in the Further Reading section.

Recommended Changes:

Add the following under 'Creating a Neighbourhood':

Better Planning, better transport, better places, CIHT

https://www.ciht.org.uk/media/10218/ciht-better-planning-a4_updated_linked_.pdf

Buses in Urban Developments, CIHT

https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf