



# **Bradford District Local Plan 2025 to 2043**

## **Regulation 19 (Publication) Draft**

### **Green, Blue and Recreational Infrastructure Technical Paper**

**October 2026**



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## Chapter 1: Executive Summary and Legislative Context

### Introduction

- 1.1. Bradford's green, blue and recreational infrastructure performs several connected but distinct roles. It provides places for recreation, play and sport; supports biodiversity and nature recovery; helps manage water and flood risk; contributes to climate resilience; creates attractive neighbourhoods; and enables walking, cycling and access to nature. The Local Plan therefore needs an integrated policy framework, whilst retaining sufficient clarity about the purpose of each policy and the evidence used to apply it.
- 1.2. This technical paper provides the evidence and reasoning that support that framework. It brings together the strategic green and blue infrastructure network, site-level green infrastructure standards, public open space, play, and outdoor and built sport and recreation. It does not treat these matters as interchangeable. A space may perform more than one function, but an environmental feature cannot automatically substitute for usable amenity space, play provision or sports capacity, and vice versa.
- 1.3. The paper supports a proportionate and transparent approach to development. For open space, the Bradford standards provide a starting point for assessing development-generated need. The final response is then determined from the characteristics of the development, the evidence for the relevant settlement and catchment, the accessibility, quality and capacity of existing provision, and realistic opportunities for on-site or off-site delivery. This avoids treating the standards as a fixed tariff or assuming that every development must provide or fund every typology.
- 1.4. The Council will prepare and publish an Open Space Cost Schedule Technical Advice Note in advance of submission of the Local Plan. The Technical Advice Note will support the implementation of Policy NE2 and Appendix 11 by setting out the cost assumptions and methodology used to calculate proportionate financial contributions, including management and maintenance costs where applicable. It will not introduce additional policy requirements or operate as an automatic tariff.
- 1.5. The principal open-space baseline remains the Bradford District Open Space Audit 2021. The Council's live GIS mapping has since been updated to reflect changes on the ground and relevant planning management and Neighbourhood Plan information. The Open Space Needs and Demand Assessment 2020 provides complementary evidence about how residents use and experience open spaces, including satisfaction, accessibility and barriers to use. The method and audit trail for updating the spatial baseline will be set out in Chapter 2 and its supporting schedule.
- 1.6. Sports provision requires additional specialist evidence. The Bradford Playing Pitch and Outdoor Sports Strategy provides the strategic framework for

playing pitches and associated facilities to 2030. The Council has also published its Indoor Sport and Built Facilities Strategy. Together these combine Bradford's Integrated Sports Strategy 2026. Green and blue infrastructure is similarly supported by the published Green and Blue Infrastructure Strategy 2026.

- 1.7. The Bradford Local Plan is being progressed through the legacy plan-making system. In accordance with the transitional provisions in the August 2026 National Planning Policy Framework (NPPF), the December 2024 NPPF is the principal national policy framework for preparing and examining the Plan. The 2026 NPPF is nevertheless considered where it introduces a material clarification or change relevant to this topic. That approach is explained in Section 1.4

### **Purpose and Scope**

- 1.8. The purpose of this technical paper is to:
- explain the relationship between the Local Plan policies for strategic green and blue infrastructure, green infrastructure standards, public open space, play, and sport and recreation;
  - identify the evidence used to prepare and justify those policies, including how evidence with different dates, purposes and spatial scales is used together;
  - record how the 2021 open-space baseline has been reviewed and updated for plan-making purposes;
  - explain the derivation and intended use of the open-space standards and delivery assumptions in Appendix 11;
  - show how development proposals will be assessed without duplicating requirements or confusing distinct policy functions; and
  - provide a clear audit trail for delivery, planning obligations and long-term management, having regard to viability and the statutory tests for planning obligations.
- 1.9. This is a supporting technical document. It does not form part of the development plan and does not create requirements additional to those in the Local Plan. Decisions must be made using the wording of the adopted policies, the Policies Map and Appendix 11, read as a whole with other relevant policies and material considerations. If there is any inconsistency, the Local Plan takes precedence over this paper.
- 1.10. The paper is intended to remain proportionate. It focuses on evidence and reasoning that are necessary to understand and justify the policy approach. Detailed site inventories, GIS change logs, calculations and worked

examples are placed in appendices or supporting schedules so that the main report remains readable.

### Scope and Relationship Between the Policies

- 1.11. The policies covered by the technical paper operate at different scales and answer different planning questions. Their relationship is summarised in Table 1.1 below.

| Policy / topic                                                                 | Primary purpose                                                                                                                                                 | Main development question                                                                                                | Principal evidence                                                                                                                                           |
|--------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ST6<br/>Strategic<br/>Green and<br/>Blue<br/>Infrastructure<br/>Network</b> | Protect, connect, restore and enhance the district-wide network and its strategic functions.                                                                    | Does the proposal safeguard network integrity and contribute appropriately to identified strategic opportunities?        | Strategic network mapping; ecological, landscape, river-catchment, access and climate evidence; Green and Blue Infrastructure Strategy 2026                  |
| <b>NE1<br/>Green<br/>Infrastructure<br/>Standards</b>                          | Embed multifunctional green infrastructure in the design and layout of development.                                                                             | Has the proposal planned green infrastructure from the outset and met the relevant design and quantitative expectations? | Site context; green infrastructure mapping and standards; biodiversity, drainage, landscape and design evidence, Green and Blue Infrastructure Strategy 2026 |
| <b>NE2<br/>Open Space,<br/>Sport and<br/>Recreation</b>                        | Protect existing open space and meet needs for amenity space, play, accessible natural space, parks, allotments, sport and recreation arising from development. | What need is generated, which typologies are relevant, and should the response be on-site, off-site or a combination?    | Open Space Audit and updates; current GIS; Needs and Demand Assessment; Playable Spaces Strategy; Playing Pitch and Integrated Sports Assessment 2026        |
| <b>SC5<br/>Sport and<br/>recreation</b>                                        | Set the wider strategic approach to sports participation and facilities, including built provision.                                                             | How should development support an accessible and sustainable network of sports                                           | Playable Spaces Strategy; Playing Pitch Strategy and Integrated Sports Assessment 2026                                                                       |

|  |  |                            |  |
|--|--|----------------------------|--|
|  |  | and recreation facilities? |  |
|--|--|----------------------------|--|

Table 1.1: Roles of the policies within the integrated framework

- 1.12. Other Local Plan policies also interact with this framework. These include policies on design and play, biodiversity and nature recovery, sustainable drainage and flood risk, active travel, health, climate resilience, and mitigation of recreational pressure on the South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC). Those interfaces are addressed where relevant, but this paper does not duplicate the evidence or justification for each separate policy topic.
- 1.13. The framework is integrated through a sequence rather than through a single combined calculation: the strategic network establishes the wider spatial context; site-level policies shape the layout and multifunctional infrastructure; the open space and sport policies identify and address recreation-related needs; and the delivery provisions determine how the agreed response is secured and managed. Chapter 4 explains these interfaces in detail.

National and Legislative Context

Applicable National Planning Policy Framework

- 1.14. The NPPF published August 2026 introduced a revised national policy framework and a new plan-making system. Its transitional arrangements state that plans prepared outside that new system should continue to be produced in accordance with the December 2024 NPPF, unless the specific transitional provisions in Annex 1 of the 2024 Framework apply. Bradford is progressing the Local Plan through the legacy system. The December 2024 NPPF is therefore the primary framework against which the Plan’s preparation and soundness should be assessed.
- 1.15. The 2026 NPPF remains relevant in two ways. First, its policies apply to decision-taking from publication unless transitional or other legal provisions indicate otherwise. Second, it provides a useful check where it materially clarifies the Government’s current expectations. References to the 2026 NPPF in this paper are therefore clearly identified and are not presented as replacing the 2024 framework for examination of the Plan.

Relevant requirements of the December 2024 NPPF

- 1.16. The policy approach has been prepared with particular regard to the following national requirements in Table 1.2 below:

| Theme | NPPF 2024 | Implication for this policy framework |
|-------|-----------|---------------------------------------|
|-------|-----------|---------------------------------------|

|                                         |                           |                                                                                                                                                                                               |
|-----------------------------------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Plan quality and evidence</b>        | Paragraphs 16, 32 and 36  | Policies should be clearly written and unambiguous, supported by relevant and proportionate evidence, effective and deliverable, and consistent with national policy.                         |
| <b>Infrastructure and viability</b>     | Paragraph 35              | The Plan should identify expected contributions, including green infrastructure and flood and water management, without undermining deliverability.                                           |
| <b>Healthy communities</b>              | Paragraphs 96, 98 and 103 | Planning should support healthy, inclusive places and plan positively for open space, sport and recreation using robust and up-to-date assessments of need, deficits and surpluses.           |
| <b>Protection of open space</b>         | Paragraph 104             | Existing open space, sports and recreational land and buildings, including playing fields and formal play spaces, should not be built on unless one of the stated national exceptions is met. |
| <b>Climate and multifunctionality</b>   | Paragraphs 125 and 164    | Land can perform multiple functions, and development should address climate adaptation through measures including green infrastructure and sustainable drainage.                              |
| <b>Natural environment and networks</b> | Paragraphs 187 and 188    | Planning should protect and enhance the natural environment and take a strategic approach to                                                                                                  |

|                      |              |                                                                                                                                                |
|----------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |              | biodiversity, green infrastructure and catchment- and landscape-scale opportunities.                                                           |
| Planning obligations | Paragraph 58 | Obligations must be necessary to make the development acceptable, directly related to it, and fairly and reasonably related in scale and kind. |

Table 1.2: Principal NPPF 2024 requirements relevant to the technical paper

- 1.17. The soundness tests are especially important to the structure of this paper. The evidence chapters explain why the policy approach is justified; the policy-interaction chapter shows how it is effective and avoids conflicting requirements; and the delivery chapter considers implementation, viability and the statutory tests for obligations.

***Material points in the August 2026 NPPF***

- 1.18. Although it is not the primary plan-making framework for Bradford’s legacy plan, the 2026 NPPF contains more explicit national policy on recreational land and green infrastructure. Policy HC1 expects plan-makers to establish locally appropriate standards for recreational land and facilities, including play, sport, informal recreation and allotments, using national standards or best practice alongside local evidence. It also supports connected, high-quality and inclusive provision, delivered on-site or through contributions as appropriate. Policy N1 expects green infrastructure standards to complement or incorporate standards for recreational land and to draw on Natural England’s Green Infrastructure Standards.
- 1.19. These changes reinforce the direction of the Bradford approach: locally evidenced standards; clear relationships between green infrastructure and recreation; inclusive and connected provision; and flexibility between on-site and off-site delivery where justified.

***Legislative and regulatory considerations***

- 1.20. The policy framework also operates within the following legal and regulatory context:
- The Planning and Compulsory Purchase Act 2004, which requires the Local Plan to be supported by appropriate evidence and examined for legal compliance and soundness;

- Section 106 of the Town and Country Planning Act 1990 and regulation 122 of the Community Infrastructure Levy Regulations 2010, which establish the statutory tests for planning obligations;
- The Conservation of Habitats and Species Regulations 2017, under which mitigation of recreational effects on the South Pennine Moors SPA/SAC is assessed for a distinct ecological purpose and must not be confused with ordinary open-space provision;
- The Environment Act 2021 and related duties and requirements concerning biodiversity net gain, local nature recovery and the conservation and enhancement of biodiversity; and
- The Equality Act 2010, including the public sector equality duty, which is relevant to inclusive access, the distribution and design of facilities, and the needs of groups who may experience barriers to participation.

1.21. This paper shows how the Plan's evidence and implementation approach have had regard to these requirements.

### Evidence Approach

1.22. The evidence base is organised as a set of complementary layers:

| Evidence source                                     | What it contributes                                                                                               | Status and use in this paper                                                                                              |
|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Bradford District Open Space Audit 2021</b>      | Site inventory; typology; quantity; accessibility; quality and settlement-level findings.                         | Published core baseline. Subsequent updates are addressed through the update process and current GIS record.              |
| <b>Current public GIS mapping and update record</b> | Current spatial representation of sites, boundaries, designations and relevant changes since the Audit.           | Operational spatial evidence. Chapter 2 will document the sources, checks and changes so that the update is reproducible. |
| <b>Open Space Needs and Demand Assessment 2020</b>  | Residents' use, views, satisfaction and barriers, including access, condition, safety, suitability and awareness. | Published qualitative evidence used alongside, not in place of, the Audit and GIS baseline.                               |

|                                                       |                                                                                                                                               |                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Bradford Playing Pitch Strategy and assessment</b> | Strategic priorities for playing pitches and associated facilities; demand, supply, quality, capacity and action planning.                    | Published strategy running to 2030. It is the principal confirmed specialist evidence for playing pitches at this stage.                                                                                                                                                                           |
| <b>Playable Spaces Strategy</b>                       | The approach to children's and young people's play, including the mix and distribution of local, neighbourhood and destination opportunities. | Published Council strategy used to inform the interpretation and design of play provision.                                                                                                                                                                                                         |
| <b>Green and Blue Infrastructure Strategy 2026</b>    | Strategic network, gaps, functions and opportunities for protection, connection, restoration and enhancement.                                 | Published strategy and baseline framework. Strategy has been used to populate and verify the boundaries for landscape-style typologies. This includes: Green and Blue Corridors, Natural and Semi-Natural Greenspace, Parks and Gardens, and Allotments.                                           |
| <b>Integrated Sports Assessment 2026</b>              | Wider outdoor and built sports demand, facility capacity, accessibility, priorities and delivery opportunities.                               | Published comprehensive review of playing pitch and indoor sports facility quality, quantity and demand across the district. Data from the ISA has been extracted to define active recreational boundaries and directly populates the Outdoor Sports Facilities and Provision for Children layers. |

Table 1.3: Evidence layers and their current status

- 1.23. Evidence will continue to be reviewed through preparation, examination and implementation of the Plan. References to the 'latest' strategy or assessment in policy implementation should mean the most recent relevant Council-published or endorsed evidence available when a proposal is assessed. The technical paper identifies the exact documents relied upon at submission so that the justification is fixed and transparent.

## Structure of the Technical Paper

- 1.24. The technical paper is structured as follows:
- **Chapter 2 – Evidence Base and Updated Spatial Baseline.** Describes the Open Space Audit and Needs and Demand Assessment, the GIS update process, the sports and green/blue evidence, and the principal district and settlement findings.
  - **Chapter 3 – Methodology for Open Space Standards.** Explains the conversion of population-based standards to per-dwelling starting requirements, the choice of typologies, accessibility standards, development thresholds and assumptions used in Appendix 11.
  - **Chapter 4 – Application of the Policies.** Explains how Policies ST6, NE1, NE2 and SC5 operate together and how they interface with play, biodiversity, flood risk, design, active travel and South Pennine Moors mitigation.
  - **Chapter 5 – Delivery, Funding and Long-term Management.** Addresses planning obligations, project identification, cost evidence, phasing, adoption or alternative management arrangements, commuted sums and monitoring.
  - **Chapter 6 – Conclusions and soundness.** Summarises how the policy framework is positively prepared, justified, effective and consistent with national policy, and identifies any matters requiring future monitoring or review.
- 1.25. Technical appendices and schedules will contain the detailed calculations, evidence update log, source references and worked examples. This separation will allow the main paper to explain the Council's reasoning clearly whilst retaining a transparent technical record.

## Chapter 2: Evidence Base and Updated Spatial Baseline

### Purpose and Approach

- 2.1. This chapter identifies the evidence used to prepare the Local Plan policies for open space, play, sport and green and blue infrastructure. It explains how the Bradford District Open Space Audit 2021 has been supplemented by current GIS information and by more specialised evidence. It does not repeat the detailed findings of those studies or provide a record of site-by-site changes.

### Core Open Space Evidence

#### ***Bradford Open Space Audit 2021***

- 2.2. The Audit provides the principal spatial baseline for open space. It identifies sites by typology and assesses the quantity and accessibility of provision within the district's settlements. It also provides the local standards from which the per-dwelling starting requirements in Appendix 11 are derived.
- 2.3. The Audit found that provision is unevenly distributed. Some densely populated urban areas have quantitative shortfalls, whilst elsewhere the more important issues are accessibility, quality, capacity or whether provision meets local needs. Its settlement findings therefore inform priorities, but do not operate as an automatic schedule of developer contributions. A recorded deficit does not by itself establish that a contribution is necessary, and provision above a quantity standard does not by itself demonstrate that a space is surplus.

#### ***Bradford Open Space Needs and Demand Assessment 2020***

- 2.4. The Needs and Demand Assessment adds evidence about how residents use and experience open space. More than 2,000 responses provide information on participation, satisfaction and the reasons people may not use particular spaces. These include the condition or maintenance of provision, safety, the suitability of facilities, ease of walking or travelling to them, and awareness of what is available. This evidence helps explain the patterns shown by the Audit and supports decisions about whether new provision, improved access or investment in existing provision would be the most effective response.

#### ***Public GIS mapping***

- 2.5. The Council's public GIS mapping provides the current spatial reference for applying the policies. It should be read with the 2021 Audit and the written update record described below. GIS mapping can show the latest known site boundary or designation, but does not on its own replace the Audit's assessment.

## Bringing the 2021 Baseline Up-to-Date

- 2.6. The 2021 Audit reflects an earlier survey and mapping date. To bring the baseline data up to the present date, the Council undertook a comprehensive desk-based review of the GIS mapping data. This was undertaken in the following ways:
- Cross-referencing planning decisions: We looked at all planning permissions granted, started or completed between 2020 and 2026 to see where development overlaps with existing designated open space from the 2021 mapping.
  - Removing and amending developed sites: Where a designated site has, or will be, developed, this has been removed from the mapping entirely. Where a development encroaches on designated open space, the boundary has been amended to show the new size and shape of the remaining open space.
  - Adding community-protected spaces: We reviewed all Neighbourhood Plans adopted across the district since 2021. Any new protected green or open spaces formally designed in those plans have been added to the mapping.
  - Correction of boundaries, names or typologies where supported by evidence.
- 2.7. This review ensures the Council is working with an accurate, reliable and up-to-date baseline of the district's open spaces.

## How the Typologies are Used

- 2.8. The ten Audit typologies remain relevant to understanding and protecting the district's open-space resource. To ensure clear categorisation, the Council's updated mapping baseline utilises a standardised colour-coded classification system within the Local Plan GIS database. Every identified green/outdoor space asset across the district is assigned to one of ten distinct open spaced typologies based on its primary function. allotments; amenity greenspace; cemeteries; civic spaces; green and blue corridors; natural and semi-natural greenspace; open land in settlements; outdoor sports facilities; parks and gardens; and provision for children and young people. allotments; amenity greenspace; cemeteries; civic spaces; green and blue corridors; natural and semi-natural greenspace; open land in settlements; outdoor sports facilities; parks and gardens; and provision for children and young people.
- 2.9. Appendix 11 uses a narrower set of typologies for routine residential calculations. This is deliberate. Cemeteries, civic spaces and open land in settlements remain within the evidence base and are protected by Policy NE2, but are normally addressed through strategic infrastructure planning, regeneration or site-specific evidence rather than a standard per-dwelling

requirement. Green and blue corridors are treated principally as a matter of protection, connectivity and site planning, rather than as a separate additional area-based requirement. Natural and semi-natural greenspace remains a quantitative typology because development may generate a need for accessible provision or enhancement of that function.

- 2.10. Play and outdoor sport are also retained within the open-space framework, but are supported by their own specialist evidence and delivery guidance. This avoids treating every development as liable for every typology whilst ensuring that relevant needs are not overlooked.

## **Specialist and Related Evidence**

### ***Play***

- 2.11. The Council's Playable Spaces Strategy provides the local context for the distribution, improvement and design of play opportunities. It supports the application of Policy DS2 and Policy NE2 to formal play space, doorstep play and play integrated into streets and public spaces. The Open Space Audit and GIS mapping remain relevant to the location and accessibility of existing provision.

### ***Outdoor and built sport***

- 2.12. The Playing Pitch Strategy provides a strategic framework for pitch sports to 2030, including evidence about supply, demand, capacity, quality and priorities for investment. It is used alongside the Audit because a simple area standard cannot determine whether demand is best met by a new pitch, an artificial grass pitch, ancillary facilities or improvement of existing provision. The Integrated Sports Assessment 2026 includes a comprehensive review of playing pitch and indoor sports facility quality, quantity and demand across the district. Data from the ISA has been extracted to define active recreational boundaries and directly populates the Outdoor Sports Facilities and Provision for Children layers.

### ***Green and blue infrastructure***

- 2.13. The Green and Blue Infrastructure Strategy 2026 provides a comprehensive district-wide asset mapping of natural systems, watercourse and ecological corridors. It provides the baseline framework to ensure that elements of the managed greenspace network, linear travel corridors and the built environment operate collectively to support sustainable development and climate resilience across the district. Specifically, it informs the Council's approach to securing Urban Greening Factor targets in development. Data from the GBI Strategy has been used to populate and verify the boundaries for landscape-style typologies. This includes: Green and Blue Corridors, Natural and Semi-Natural Greenspace, Parks and Gardens, and Allotments.

## **Evidence outputs**

- 2.14. Taken together, the evidence informs the Policies Map, settlement priorities, the standards and methodology in Appendix 11, and the assessment of individual development proposals. The evidence is complementary: the Audit establishes the open-space baseline; the Needs and Demand Assessment explains residents' use and experience; specialist studies test particular forms of play and sport; and green and blue infrastructure evidence considers the wider network.

Chapter 3: Methodology for Open Space Standards

Purpose of the Methodology

- 3.1. The Open Space Audit expresses quantity standards in hectares per 1,000 population. Appendix 11 converts the relevant standards into square metres per dwelling so that the starting requirement arising from a residential development can be calculated consistently. The conversion changes the unit of measurement; it does not increase the underlying Audit standard.
- 3.2. National policy does not prescribe a per-dwelling formula or dwelling thresholds for individual typologies. Bradford’s approach is locally derived from its Audit and demographic evidence. It provides a transparent starting point whilst retaining the site- and catchment-specific assessment needed to decide which typologies are relevant and how provision should be delivered.

Conversion to a Per-Dwelling Standard

- 3.3. The conversion uses an average household size of 2.60 persons, derived from 2021 Census data for Bradford. One hectare is 10,000 square metres (m²). A standard expressed as hectares per 1,000 population is therefore converted as follows:

*hectares per 1,000 population × 10 = square metres per person*

*square metres per person × 2.60 = square metres per dwelling*

- 3.4. For example, the Audit standard for amenity greenspace is 0.50 hectares per 1,000 population. This equates to 5m² per person and, when multiplied by 2.60, to 13m² per dwelling. The same calculation has been applied consistently to the relevant area-based typologies.

Standards Used for Routine Residential Calculation

- 3.5. Appendix 11 uses the following area-based standards as the starting point for residential development:

| Typology                            | Audit standard<br>(ha per 1,000) | Derived standard<br>(m² per dwelling) |
|-------------------------------------|----------------------------------|---------------------------------------|
| Allotments                          | 0.20                             | 5.2                                   |
| Amenity greenspace                  | 0.50                             | 13.0                                  |
| Natural and semi-natural greenspace | 1.00                             | 26.0                                  |
| Outdoor sports facilities           | 1.80                             | 46.8                                  |
| Parks and gardens                   | 0.90                             | 23.4                                  |

Table 3.1: Conversion of the relevant Audit quantity standards

- 3.6. Cemeteries, civic spaces and open land in settlements remain part of the Audit and the protection afforded by Policy NE2, but are not included in routine per-dwelling calculations. Their future provision is more appropriately considered through strategic infrastructure planning, regeneration proposals or site-specific evidence. Green and blue corridors are principally addressed through protection, connectivity and site planning under Policies ST6 and NE1. Excluding these typologies from the routine calculation avoids implying that every residential scheme should make a separate contribution towards them.

### **Provision for Children and Young People**

- 3.7. The Audit expresses provision for children and young people as 0.4 sites per 1,000 population rather than as an area standard. Applying the same household assumption gives 0.00104 sites per dwelling, equivalent to approximately 1 site per 962 dwellings.
- 3.8. This figure indicates cumulative need; it is not a mechanical on-site trigger and must not lead to small or unusable fragments of play space. The appropriate form of provision is determined through Policy DS2, Policy NE2 and Appendix 11, having regard to the Playable Spaces Strategy, the scale and likely child population of the development, existing accessible provision and identified opportunities. This may include doorstep play, play on the way, local or neighbourhood playable space, or investment in an appropriate off-site facility.

### **From the Calculation to a Development Requirement**

- 3.9. For residential development of 10 or more net additional dwellings, the number of dwellings is multiplied by each potentially relevant standard. This establishes the starting quantities to be tested through the Open Space Needs and Provision Statement. The assessment then determines:
- which typologies are relevant to the development and its expected occupants;
  - what existing and committed provision serves the site, including its accessibility, quality and capacity;
  - whether the calculated amount could form a functional, safe, accessible and maintainable facility on-site; and
  - whether the need is better met on-site, through an identified off-site project, or by a combination of both.
- 3.10. The resulting requirement may therefore differ from a simple sum of all starting calculations, but any adjustment must be explained by evidence rather than by selecting the cheapest typology or maximising developable land. Essential amenity greenspace and play required to achieve an acceptable layout cannot simply be replaced by an off-site payment.

### **Indicative On-Site Delivery Thresholds**

- 3.11. Appendix 11 identifies the development scale at which a new on-site facility should normally be considered for particular typologies. These are locally derived delivery assumptions, informed by the per-dwelling standards and the amount of land needed to create coherent and usable provision. They are not national thresholds and do not determine whether a need exists.
- 3.12. Below a threshold, an identified off-site improvement or planned facility will often provide a better outcome than a small stand-alone site. At or above a threshold, the applicant must assess the need, feasibility and desirability of on-site provision. The Council may still agree an off-site or combined response where it would better meet the identified need, particularly for specialist sports facilities. Conversely, a smaller development may provide a facility on-site where this is appropriate and achievable.

### **Assumptions and Review**

- 3.13. The 2.60-person household figure is a district average suitable for general housing calculations. Specialist housing and communal accommodation require an occupancy-led assessment because their likely resident population and use of open space may differ. The standards and conversion should be reviewed if a replacement Open Space Audit, updated Census evidence or a material change in household assumptions provides a more appropriate basis.

Chapter 4: Application of the Policies

Purpose

- 4.1. The Local Plan addresses green and blue infrastructure, open space, play and sport through a group of related policies. Their subject matter overlaps, but their purposes are distinct. This chapter explains how they should be applied together so that development delivers a coherent response without omitting a necessary requirement or applying the same quantitative requirement twice.

The Role of Each Policy

- 4.2. The principal division of responsibility is summarised below:

| Policy                                                      | Primary role                                | What it does                                                                                                                                                                     |
|-------------------------------------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ST6: Strategic Green and Blue Infrastructure Network</b> | District-wide spatial framework             | Protects and strengthens the strategic network and guides connections between assets.                                                                                            |
| <b>NE1: Green Infrastructure Standards</b>                  | Site-wide design and delivery               | Requires development to plan, deliver and manage green and blue infrastructure, including multifunctional SuDS and nature-based solutions.                                       |
| <b>NE2: Public Open Space</b>                               | Open-space protection and development needs | Protects existing provision and applies Appendix 11 to determine on-site, off-site or combined provision for open space, play and sport.                                         |
| <b>SC5: Sport and Recreation Provision</b>                  | Sport and recreation strategy               | Will address the planning and delivery of sport and recreation facilities, informed by the Playing Pitch Strategy and Integrated Sports Assessment. Final scope to be confirmed. |

Table 4.1: Principal policy roles

- 4.3. Other policies remain relevant. Policy DS2 sets design requirements, including for doorstep play and play on the way. Policy NE3 deals separately with recreational pressure on the South Pennine Moors SPA/SAC. Statutory biodiversity net gain and policies for trees, drainage, flood risk, design and

active travel may also apply. Meeting NE2 does not remove those requirements, and compliance with them does not automatically satisfy NE2.

### **Application Sequence**

- 4.4. The policies should be applied as a coordinated sequence rather than as separate exercises.

#### ***Step 1: Establish the site and network context***

- 4.5. Identify existing open space, sport and recreation land, Local Green Space, strategic green and blue infrastructure, ecological designations, watercourses, access routes and other relevant assets. Apply the protection and loss tests before considering how development-generated needs will be met.

#### ***Step 2: Define the site-wide green and blue infrastructure response***

- 4.6. Use Policies ST6 and NE1 to establish the connections, functions and site-wide measures required. These should shape the layout from the outset and coordinate landscape, habitat, water management, active travel and climate-resilience measures.

#### ***Step 3: Assess open-space, play and sports needs***

- 4.7. Apply Policy NE2 and Appendix 11 to identify the needs generated by the development and the relevant typologies. Play must also satisfy Policy DS2. Outdoor and built sport should be assessed against the Playing Pitch Strategy, Integrated Sports Assessment and Policy SC5.

#### ***Step 4: Agree an integrated delivery package***

- 4.8. Determine what must be provided on-site and what is better delivered through an identified off-site project. The package may combine on-site amenity, play or natural space with off-site investment in parks, allotments or sports facilities. It must be justified by the development's needs, the evidence for the catchment and the practicality of providing a functional facility.

#### ***Step 5: Secure delivery and management***

- 4.9. Coordinate phasing, ownership, public access, management, maintenance and any financial contribution. Requirements serving different purposes should be identified clearly in the planning permission or obligation.

### **Multifunctionality and Overlapping Requirements**

- 4.10. Multifunctional provision is encouraged. The same space may provide recreation, habitat, drainage, cooling and active-travel benefits where those functions are compatible and each policy outcome is demonstrably achieved.

- 4.11. Spatial overlap is therefore not automatically duplication. For example, amenity greenspace may count towards the open space requirement in Appendix 11, contribute to Urban Greening Factor (UGF) under Policy NE1 and form part of the habitat provision used to demonstrate Biodiversity Net Gain (BNG). This is not, in itself, double counting, because the three requirements measure different outcomes. However, multifunctionality does not mean that any green feature can be credited against every requirement.
- 4.12. The following principles apply:
- 4.13. **Open-space requirements.** Land counted towards an Appendix 11 requirement must perform the relevant open space function and meet the applicable standards for accessibility, usability, quality, design and management. The same area should not be used to satisfy two separate quantitative open-space typology requirements. Where a space performs several open-space functions, it should be recorded under its principal typology for monitoring purposes.
- 4.14. **Urban Greening Factor (UGF).** Open space, trees, planting, green roofs, sustainable drainage features and other green infrastructure may contribute to the UGF in accordance with the calculation method set out under Policy NE1. Their contribution will depend on the type and extent of green infrastructure provided.
- 4.15. **Biodiversity Net Gain (BNG).** Habitat created or enhanced within amenity greenspace or another form of open space may contribute to biodiversity net gain where it is properly included in the statutory biodiversity metric and Biodiversity Gain Plan and any necessary management and monitoring arrangements are secured. A space does not have to be publicly accessible to count towards BNG. However, it must be accessible and usable where it is also being relied upon to meet a public open space requirement.
- 4.16. **Compatible functions.** A habitat, drainage or landscape feature may form part of the open space provision where its design is compatible with the intended recreational or amenity use. Features that are inaccessible, unsafe or unsuitable for recreation may still contribute to UGF or BNG, but should not be counted towards the usable open space requirement.
- 4.17. **Separate impacts.** Measures required to replace lost open space or mitigate a separate environmental effect should not automatically be treated as meeting the additional open-space need generated by the development. Any overlap must be justified against the relevant policy and statutory requirements. The specific national rules governing what mitigation and enhancement may count towards BNG must also be followed.
- 4.18. **Financial contributions.** A single intervention may deliver several policy benefits, but the same item of expenditure must not be charged twice. Planning obligations must be necessary, directly related to the development and fairly and reasonably related in scale and kind.

## How the Approach Could Work in Practice

- 4.19. **Major housing development.** A development may provide amenity greenspace, play, sustainable drainage, habitat, trees and walking routes as an integrated on-site network. The same land and features may contribute to the open-space requirements in Appendix 11, the UGD and BNG where the relevant requirements and calculation methods are satisfied. An off-site contribution may also be required towards an identified allotment, sport or other open-space project where this would meet an evidenced need generated by the development.
- 4.20. **Sports provision.** Sports facilities may form part of a wider multifunctional open-space network. For example, a playing field may also provide open-space, drainage and urban-greening benefits. Boundary habitats, trees, SuDS and other associated features may contribute to UGF and BNG where they are included in the relevant calculations and do not compromise the safe and effective use of the sports facility.
- 4.21. **Development affecting existing open space.** The protection and loss tests in Policy NE2 should be applied before assessing the additional needs generated by the development. Replacement provision required to address a loss should not automatically be treated as meeting those additional needs. It may do so only where the evidence demonstrates that it would provide additional capacity, quality or functionality beyond that required to replace what would be lost.
- 4.22. **Development within the South Pennine Moors zone of influence.** Recreational-pressure mitigation under Policy NE3 should be assessed separately from the open-space needs generated by the development. A project may contribute to both requirements only where the separate purpose and outcome of each requirement are clearly demonstrated and the same work or expenditure is not secured twice.

## Conclusion

- 4.23. The policy framework is intended to produce one coordinated green, blue and recreational infrastructure response. ST6 establishes the strategic network; NE1 integrates green and blue infrastructure into development; NE2 protects open space and addresses development-generated need; and SC5 provides the complementary sport and recreation framework. Appendix 11 supplies the detailed assessment and delivery method rather than creating a separate policy requirement.

## Chapter 5: Delivery, Funding and Long-Term Management

### Purpose

- 5.1. This chapter explains how the integrated package identified through the policies and Appendix 11 will be delivered, funded and managed. It does not create additional requirements. Its purpose is to show how necessary provision can be secured transparently, at the right stage of development and with arrangements that remain effective over the long-term.
- 5.2. The delivery mechanism will depend on the nature of the requirement. It may include provision by the developer, a planning condition, a section 106 planning obligation, an off-site financial contribution or a combination of these. Each obligation must satisfy the statutory tests: it must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

### Agreeing the Delivery Approach

- 5.3. Delivery should be considered whilst the site layout and infrastructure strategy are being prepared, not after the developable area has been fixed. Early discussion with the local planning authority and relevant Council services, including Parks and Sport, will help identify the appropriate typologies, whether provision should be on-site or off-site, and any design, adoption or management requirements.
- 5.4. For strategic or phased development, the agreed package should be recorded in a coordinated infrastructure delivery schedule. This should distinguish between open space, play, sport, green and blue infrastructure, drainage and biodiversity measures while identifying where one intervention performs several compatible functions. It should state what will be delivered, by whom, in which phase and how it will be managed.

### On-Site Provision

- 5.5. Where open space, play, sport or green infrastructure is to be provided on-site, the planning permission and any associated obligation should secure the matters necessary to make the provision effective. Depending on the proposal, these may include:
  - the location, extent and intended function of the land or facility;
  - the design principles, specification and relationship to the wider site;
  - public access and connections to surrounding routes and spaces;
  - delivery and opening triggers linked to the relevant phase or level of occupation;
  - approval, inspection, establishment and handover arrangements; and

- ownership, management, maintenance, monitoring and replacement of facilities.
- 5.6. The detailed design may be resolved through reserved matters or a later approval where appropriate, but the permission should establish sufficient certainty about the quantity, function, broad location, phasing and management of the provision. On-site provision should not be treated as residual land or left until the final phase where it is needed to serve earlier occupants.

### **Off-site provision and financial contributions**

- 5.7. Off-site provision may be appropriate where it would meet the identified need more effectively than a small or unsuitable on-site facility. This is particularly relevant to parks, allotments and sports facilities that serve a wider catchment. It does not justify replacing amenity space, play or other on-site provision needed to create an acceptable development layout.
- 5.8. A financial contribution should be linked to an identified project or programme that serves the development and can provide additional capacity, improved accessibility or a measurable improvement in quality. The supporting evidence should identify:
- the need generated by the development and the relevant catchment;
  - the facility, project or programme to which the contribution will be directed;
  - the works or outcomes to be delivered and how they will address that need;
  - the development's proportionate share of the cost, allowing for any provision made on-site; and
  - the payment trigger, indexation, delivery or spending period, monitoring and repayment arrangements.
- 5.9. The basis for calculating the development's proportionate share will be set out in the Council's Open Space Cost Schedule Technical Advice Note, which will be published in advance of submission of the Local Plan.
- 5.10. Sports contributions should also be informed by the Playing Pitch Strategy, the Integrated Sports Assessment and other relevant facility evidence. Contributions from more than one development may support the same project where each contribution is related to the demand arising from that development and independently satisfies the statutory tests.

### **Costs, apportionment and viability**

- 5.11. The Council will prepare and publish an Open Space Cost Schedule Technical Advice Note in advance of submission of the Local Plan. The Technical Advice Note will provide transparent cost assumptions and a methodology for calculating financial contributions towards identified off-site provision or enhancement. It will set out the relevant price base, indexation

arrangements and the treatment of capital provision and, where applicable, management and maintenance costs.

- 5.12. The Technical Advice Note will support, rather than replace, the assessment required by Policy NE2 and Appendix 11. It will not operate as an automatic tariff or require every development to contribute towards every open-space typology. Any contribution must address a need generated by the development, relate to identified provision or an improvement serving that development, satisfy the statutory tests for planning obligations and allow for any appropriate provision made on-site. Current project-specific cost evidence may be used where an identified project differs materially from the assumptions in the published cost schedule.
- 5.13. Capital provision and long-term management are separate cost elements. A management or maintenance contribution may be required where it is necessary to keep new or improved provision functioning for its intended purpose. If transfer to the Council is proposed, this will be subject to the Council's agreement, its design and handover requirements and an evidenced commuted sum. The maintenance period and amount must be justified by the management plan and anticipated lifecycle costs rather than assumed in every case.
- 5.14. Where an applicant seeks a different provision package on viability grounds, the applicant must demonstrate the relevant circumstances and the Council will determine the weight to be given to that evidence. The Technical Advice Note must remain consistent with Policy NE2 and Appendix 11 and must not introduce a new policy requirement.

### **Ownership and long-term management**

- 5.15. A clear and viable management arrangement must be established before permission is granted. Provision may be retained by the landowner or developer, transferred to a management company or community organisation, or offered to the Council. There is no presumption that the Council will adopt new land or facilities. Whichever model is used, responsibilities, public access, funding, standards and enforcement arrangements must be clear.
- 5.16. The management plan should be proportionate to the provision and cover establishment, routine and specialist maintenance, inspection of play and sports equipment, ecological and drainage functions, repair and replacement, monitoring and contingency arrangements. Where the same land contributes to open space, UGF and BNG, management should coordinate the different functions without weakening any of them. Statutory BNG requirements, including the applicable habitat management period, remain distinct and must be secured through the relevant Biodiversity Gain Plan and legal mechanism.

### **Phasing, monitoring and review**

- 5.17. Delivery triggers should be expressed precisely and linked to the phase or level of occupation that creates the need. On-site provision should be completed and made usable before or alongside the occupation it is intended to serve. Off-site payments should be timed so that the identified project can be delivered when the additional demand arises. Agreements should specify how and when unspent funds are to be returned.
- 5.18. The Council should monitor both the obligations secured and the outcomes delivered. Relevant matters include the amount and type of provision, losses and replacements, delivery against agreed triggers, contributions received and spent, completion of identified projects, accessibility and quality, and the operation of long-term management arrangements. Reporting should be coordinated with the planning register, Infrastructure Funding Statement, Authority Monitoring Report and updates to the Council's GIS and evidence base.
- 5.19. Monitoring will also show whether the standards, delivery assumptions, Open Space Cost Schedule Technical Advice Note or management approach require review.

### **Conclusion**

- 5.20. The delivery framework combines flexibility about the form and location of provision with clear controls over need, purpose, cost, timing and management. It supports direct on-site provision where this is integral to the development and targeted off-site investment where that would provide a better and more effective outcome. In every case, the requirement must be evidenced, proportionate, secured through an appropriate mechanism and capable of being maintained for its intended purpose.

## Chapter 6: Conclusions and Soundness

### Purpose

- 6.1. This chapter draws together the conclusions of the technical paper and considers the Local Plan approach against the soundness tests in the December 2024 NPPF. Bradford is preparing the Plan through the legacy plan-making system, so the December 2024 NPPF remains the principal framework for plan preparation and examination.

### Overall Conclusions

- 6.2. Green, blue and recreational infrastructure perform connected but distinct functions. It is therefore considered to be appropriate for the Local Plan to use a coordinated group of policies rather than treating all provision as one interchangeable land requirement. Policies ST6 and NE1 establish the strategic and site-wide green and blue infrastructure framework; Policy NE2 protects open space and addresses needs generated by development; Policy SC5 addresses the specialist evidence for outdoor and built facilities and Policy DS2 provides design-led policies and complementary play requirements.
- 6.3. The Bradford District Open Space Audit 2021 remains an appropriate starting point when read with the Open Space Needs and Demand Assessment, the Council's updated GIS mapping and specialist evidence for play, sport and green and blue infrastructure. Converting the relevant Audit standards from hectares per 1,000 population to square metres per dwelling makes the calculation easier to apply without changing the underlying standards. Appendix 11 then provides the site- and catchment-specific assessment needed to determine the final package.
- 6.4. This approach avoids two unhelpful extremes: treating every standard as an automatic charge for every development, or allowing development to avoid necessary on-site provision by offering an off-site payment. It supports on-site amenity, play and other provision where integral to an acceptable layout, while allowing investment in existing or planned parks, allotments and sports facilities where that would provide a more effective response to the identified need.

### Assessment Against the Soundness Tests

- 6.5. **Positively prepared.** The framework plans for development-generated needs whilst supporting health, recreation, biodiversity, water management, climate resilience and active travel. Its combination of on-site and off-site delivery allows infrastructure to be provided at the scale and location at which it can function effectively.

- 6.6. **Justified.** The approach is founded on Bradford's local evidence and a transparent conversion methodology. It explains why some Audit typologies are included in routine residential calculations and why others are addressed through protection, connectivity, infrastructure planning or site-specific evidence. The standards are used as a starting point rather than a substitute for professional judgement and local evidence.
- 6.7. **Effective.** The policies have distinct roles, Appendix 11 establishes a usable assessment method and Chapter 5 explains delivery, funding and management. The approach identifies how multifunctional provision may contribute to open space, UGF and BNG whilst requiring each separate policy outcome to be demonstrated. Monitoring and evidence updates provide a basis for review. The Open Space Cost Schedule Technical Advice Note and associated viability testing will complete the supporting implementation evidence before submission of the Local Plan.
- 6.8. **Consistent with national policy.** The framework protects valued open space, sport and recreation land; applies the national tests to any proposed loss; plans positively for access to high-quality open space and opportunities for sport; and requires planning obligations to be necessary, directly related to the development, and fairly and reasonably related in scale and kind. It also supports multifunctional green infrastructure without treating it as an automatic substitute for usable recreational provision.

### Final Conclusion

- 6.9. The Bradford approach provides a proportionate and transparent basis for protecting and delivering green, blue and recreational infrastructure. It is locally evidenced, distinguishes between different infrastructure functions, allows appropriate flexibility in delivery and includes mechanisms for funding, management and monitoring. The framework is therefore capable of being positively prepared, justified, effective and consistent with national policy.