



BRADFORD LOCAL PLAN - SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT

Interim Report to accompany Regulation 18 Consultation

FEBRUARY 2021



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This report dated 08 February 2021 has been prepared for City of Bradford Metropolitan District Council (the “Client”) in accordance with the terms and conditions of appointment dated 10 April 2019 (the “Appointment”) between the Client and **Arcadis Consulting (UK) Limited** (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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Abbreviations

Abbreviation	In full
AA	Appropriate Assessment
AAP	Area Action Plan
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BHS	Biological Heritage Site
CO ₂	Carbon Dioxide
cSAC	Candidate Special Area of Conservation
DEFRA	Department for Environment Food and Rural Affairs
DCLG	Department of Communities and Local Government
dpa	Dwellings per annum
DPD	Development Plan Document
dph	Dwellings per hectare
EA	Environment Agency
EC	European Council
ELNA	Economic Land Need Assessment
ELSA	Economic Land Supply Assessment
FZ	Flood Zone
GHG	Greenhouse Gases
GP	General Practitioner
HRA	Habitats Regulations Assessment
IMD	Index of Multiple Deprivation
LDP	Local Development Plan
LDS	Local Development Scheme
LPA	Local Planning Authority
LSE	Likely Significant Effect
LWS	Local Wildlife Site
LSOA	Lower Super Output Area
MHCLG	Ministry of Housing, Communities and Local Government
MW	Megawatts
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NTS	Non-Technical Summary
OAN	Objectively Assessed Need
pSPA	Potential Special Protection Area
RIGS	Regionally Important Geological/Geomorphological Site
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SANGs	Suitable Alternative Natural Greenspaces
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SNCV	Site of Nature Conservation Value
SoS	Secretary of State
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SuDS	Sustainable (urban) Drainage System
SUEs	Strategic Urban Extensions

Non-Technical Summary

The Local Plan

The City of Bradford Metropolitan District Council (the Council) is in the process of preparing a new Bradford Local Plan (hereafter referred to as the Local Plan). In April 2019, Arcadis Consulting UK Ltd (Arcadis) were commissioned to provide Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) services to assist with the Council's Plan-making.

The Core Strategy DPD, which was successfully adopted on 18 July 2017, form the base of the Local Plan for Bradford, and will be replaced when the Local Plan is Adopted. It sets out the strategic housing, employment, transport, retail, leisure and environmental policy requirements for the District and provides context for the scale, location and distribution of development.

Following updates to national planning policy, particularly that which is related to calculating housing needs and Green Belt protection, the Council determined that a partial review of the recently adopted Core Strategy was necessary. The Draft Local Plan, which is the latest stage in the plan-making process, integrates the previous work done on the Core Strategy Partial Review, Area Action Plans, Waste Management DPD and Site Allocations DPD.

Sustainability Appraisal and Strategic Environmental Assessment

The Council, as the local planning authority (LPA), is legally required to carry out a Sustainability Appraisal (SA) of their Plans. After adopting a plan, the LPA must make the SA Report available.

SA is a mechanism for assessing the extent to which an emerging plan promotes sustainable development, by applying a holistic assessment of the likely effects of the plan on social, economic and environmental objectives.

Strategic Environmental Assessment is a systematic process designed to:

“Provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.

This is the non-technical summary of an Interim SA Report intended to accompany the Regulation 18 consultation on the Local Plan.

This SA of the Local Plan integrates the requirements of SEA (and is from here on referred to in this report simply as the SA).

SA is an iterative process and, over several stages and potentially multiple SA Reports, will help the Council with achieving sustainable development in their plan-making. This is by predicting and evaluating the likely sustainability effects (including environmental, social and economic effects) of options being considered for the Local Plan (including individual impacts and cumulative effects) so the Council can make informed choices over what policies and development to pursue in their Plan. The SA also provides recommendations to the LPA which, if adopted, would help to avoid or mitigate any likely adverse sustainability impacts of options or alternatively would help to enhance the likely positive sustainability impacts. It is expected that the SA will make a meaningful contribution towards ensuring that the Local Plan delivers sustainable development in Bradford alongside other evidence documents being prepared by the Council.

As this document is an Interim SA Report it is not intended, and is not able, to fully satisfy the requirements of an SEA Environmental Report at this stage. The assessment has taken into account the information available at this time, and a further iteration will be undertaken, following public consultation. This will take into account changes to the Local Plan, as well as comments on the SA itself.

The Scoping Stage

The first stage of the SA process was the scoping stage, within which the context, relevant objectives, baseline data and scope of the SA was established and consulted on with stakeholders. The scoping stage concluded in April 2019.

It is an essential requirement, as well as a necessary component of preparing a robust and accurate appraisal, to understand the policy context in which the SA is being prepared. A comprehensive review of plans and programmes at a national, regional, sub-regional/city region and local level was therefore undertaken during the scoping stage to identify implications for the Local Plan and the SA.

Baseline information refers to the existing economic, social and environmental characteristics of an area that may be affected by the Local Plan. It informs the development of a set of SA Objectives, which in turn informs the SA and plan preparation. Baseline information detailing a range of social, economic and environmental data was obtained from a number of sources during the scoping stage. This data was used to identify key sustainability issues in Bradford to determine key objectives for the Local Plan.

Using the baseline data as well as the identified key issues and opportunities for the Plan area, an SA Framework made up of a number of SA Objectives was prepared. The SA Objectives are up-to-date, relevant to the Bradford context and allow a consistent approach to predicting and evaluating the economic, environmental and social effects of the Local Plan policies. Every policy in the Local Plan, and reasonable alternatives, will be assessed against these SA Objectives to determine their likely sustainability impacts. The SA Framework consists of the following SA Objectives:

- To ensure the prudent and efficient use of energy including the promotion of renewable and low carbon energy;
- To minimise waste and increase the amount of waste which is re-used, recycled and recovered;
- To reduce and manage the impacts of climate change on the District and vulnerability to its effects;
- To safeguard and improve air quality;
- To safeguard and improve water resources;
- To conserve and enhance geodiversity and biodiversity, including the internationally, nationally and locally valued wildlife species and habitats;
- To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes;
- To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources;
- To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts and reduces congestion, pollution and carbon emissions by increasing transport choice and reducing the need to travel by lorry/private car;
- To make efficient use of existing land and buildings;
- To conserve and, where appropriate, enhance the significance of heritage assets and their setting;
- To improve the quality and range of services available within communities and connections to wider social, environmental and economic networks;
- To promote social cohesion, encourage participation and improve the quality of life in deprived neighbourhoods;
- To create good cultural, leisure and recreation activities available to all;
- To improve safety and security for people and property;
- To provide the conditions and services to improve physical and mental health and well-being and reduce inequality to access to health and social care;
- To promote education and training opportunities which build the skills and capacity of the population;
- To increase the number of high-quality job opportunities suited to the needs of the local workforce; and
- To support investment and enterprise that respects the needs of a local area.

Developing Alternatives

For all policies being reviewed and amended, the Council could potentially include a range of different alternative policy wordings or approaches. The SEA Regulations requires the Council to identify 'reasonable alternatives' for all policies and proposals, where feasible. The sustainability impacts of all reasonable alternatives should then be identified and evaluated. From these reasonable alternatives, the Council can then identify their 'preferred options' for policies and proposals in the Local Plan. It is important that the selection of each preferred option is justified in light of the alternatives that were available.

A key purpose of this Interim SA Report is to predict and evaluate the likely sustainability effects of all reasonable alternatives identified by the Council, as well as preferred options, and to document these findings in order that the Council can factor this into their decision-making over what the policies and proposals in the Local Plan will look like. Recommendations are made alongside the assessments for consideration by the Council in order to help maximise positive sustainability impacts and to avoid or mitigate negative impacts of the Local Plan. This Interim SA Report also seeks to 'tell the story' of how reasonable alternatives were identified by the Council as well as how the Council selected and defined their 'preferred options' from these alternatives.

The Regulation 18 version of the Local Plan presents a range of strategic and thematic policies together a series of local area profiles (including site allocations) that conform with the Local Plan Objectives and would help to achieve the Council's vision for the District. For each policy under review, the Council presents their preferred option followed by the reasonable alternative considered. As the Local Plan carries forward some of the policies from the adopted Core Strategy, some policies have not been re-appraised at this stage. They are the same policies that were found to be sound and were successfully adopted in 2017. These policies are also known to conform with the Plan's objectives. It is therefore considered that any alternative to these policies would not be 'reasonable' and so no reasonable alternatives to these policies are identified.

Overall, the Council identified a range of reasonable alternatives for the housing need, spatial distribution, strategic policies, and various thematic policies.

Assessments

The assessments of options are essentially a prediction of their likely effects on each SA Objective (i.e. would the option contribute towards achieving the SA Objective?) and an evaluation of the magnitude, reversibility, permanence, probability, duration and frequency of these effects. There is an assessment of each individual option as well as an assessment of the likely cumulative impacts of all options in-combination. The assessments of the policies and proposals in the Local Plan, including the preferred options and reasonable alternatives, identified a range of sustainability impacts. **Table NTS-1** summarises the policy assessments, **Table NTS-2** the SUE assessments and **Table NTS-3** the site assessments.

NTS-1: Summary of policy assessment results for each SA Objective

SA Objective 1: Energy & GHGs

Strategic Policies SP1-SP16 aim to set out the District's key principles and ensure development in Bradford provides a consistent approach to development priorities. Policies SP1, SP8 and SP9-16 in particular ensure that the Council supports the achievement of sustainable developments and improvements to environmental conditions, resulting in improvements to energy efficiency and an overall reduction in GHG emissions. Policies SP6, SP8 and SP12 would see the most negative impacts associated with development and GHG emissions, and they aim to prioritise urban expansion and economic growth over the environment.

Policies Planning for Prosperity EC1-4 support and encourage significant development, which would result in significant increases in energy consumption and associated transport usage, leading to an increase in energy consumption and GHG emissions. Similarly, Policies HO1-10 support the delivery of housing growth, and there would be an associated increase in residential energy consumption and GHG emissions, thereby not supporting the SA Objective.

Policies TR1-5 are overwhelmingly supporting the use of sustainable transport methods, with TR6 including mitigation to minimise emissions associated with increased freight.

Planning for Place and Community Policy CO1 aims to protect open space, maintaining the green infrastructure required

to act as a carbon sink and reduce the net GHG emission in the District. Policies EN1-10 encourage the expansion of green spaces and the protection of the environment, resulting in an overall significantly positive impact and achieving the SA Objective. EN21 would have a significantly positive impact on the SA Objective, as it encourages the minimisation of emissions and the increase of energy efficiency.

Policies EN11 – EN17 each have a significantly negative impact on this SA Objective, as they permit and encourage the extraction of minerals and energy and support the use of fossil fuels and would therefore actively contribute to the consumption of energy and GHG emissions in the District.

Policies for Planning for Place and Communities: Design (DS1 – DS5) would overall have a slight positive impact on the Objective, through the protection and enhancement of greenfield sites and tree cover. These would act as carbon sinks and contribute to a degree of offsetting of emissions.

Policies for the Implementation, Delivery and Monitoring (ID1 – ID3) support the provision of additional infrastructure, resulting in an increase in demand of energy in the District and a slight negative impact on the SA Objective.

SA Objective 2: Waste

Strategic Policies SP1-SP16 would overall have negligible effects on the SA Objective for waste. SP13 would have a significantly positive effect on the Waste SA Objective through encouraging recycling and the reuse of materials, aiming to reduce the volume of waste sent to landfill.

Economic Policies EC1-4 are likely to negatively impact the SA Objective, as each policy supports significant development and associated increases in waste and materials. These policies could seek to implement circular economy principles in order to reduce their effect on waste management in the District.

Thematic Policies TR1 – TR7 are not likely to significantly impact on SA Objective. TR1 would prioritise the enhancement of existing infrastructure, which in turn would make efficient use of resources and have the potential to reduce waste.

All Policies Planning for Homes HO1 – HO10 would have a slightly negative impact on the SA Objective through the encouragement of housing growth and the associated increases in construction and residential waste. Similarly, Policy CO2 would encourage the provision of infrastructure and increase the production of waste and materials used in construction. Policies CO1 and CO3 would have a negligible impact on the Objective.

Policies EN1 – EN10 would each have negligible impact on the Waste SA Objective. Policies EN11 – EN17 each have a significantly negative impact on this SA Objective, as they permit and encourage the extraction of minerals and energy and therefore would contribute to the production of waste and new materials in the District.

Policies for Planning for Place and Communities: Design (DS1 – DS5) would overall have a slight positive impact on the Objective, through the use of efficient design and use of materials. This would likely result in the reduction in waste generation and materials consumption.

Policies for the Implementation, Delivery and Monitoring (ID1 – ID3) support the provision of additional infrastructure, resulting in an increase in pressure on waste management infrastructure in the District and a slight negative impact on the SA Objective.

SA Objective 3: Land & Buildings

Strategic Policies SP9 would achieve the SA Objective by ensuring the most effective use of land by conserving existing buildings and reusing previously developed land. SP12 supports the extraction of new materials and minerals, thereby permanently losing land to quarrying and extraction sites and having a significantly negative impact on the SA Objective. SP Policies overall have a negligible or neutral impact on the Land and Buildings SA Objective.

The Economic Thematic Policies each support significant employment development and the likely loss of greenfield sites. EC1 – EC4 direct new developments towards locations with opportunities for using PDL, but this would not guarantee a reduction in land lost to development. Policies ID1 – ID3 would also potentially increase development on previously undeveloped land.

Policies TR2 – TR7 would have negligible impact on the SA Objective. TR1 would prioritise the enhancement of existing infrastructure over new development, resulting in an efficient use of land and existing infrastructure. Similarly, Policy DS1 encourages regeneration of areas and development on PDL and would therefore have a positive impact on the Objective.

Each of the Planning for Homes Policies (HO1 – HO10) would support the delivery of significant number of new homes and therefore a significant quantity of land would be lost to the development. Policies HO3 and HO10 may result in a smaller quantity of land for development through housing densities and repurposing brownfield land, which may have a

slightly less negative impact on the SA Objective.

Of the Planning for Place and Community Policies, EN2 – EN7 would each have a slight positive impact on the Land and Buildings SA Objective through the protection and enhancement of the landscape and green infrastructure. Policies CO1 – CO3, EN1 and EN8 – EN10 would have a negligible impact on this Objective. Policies EN11 – EN17 each have a significantly negative impact on this SA Objective, as they permit and encourage the extraction of minerals and energy and therefore would contribute to the consumption of land in the District.

SA Objective 4: Climate Change Resilience

Policy SP2, SP9 and EN3, EN7 and EN10 would have a the most positive impact on the SA Objective, as each proactively address the impacts and results of climate change and its likely impact on the District. EN7 would increase flood storage and addresses flood risk management, reducing the vulnerability of the District to flooding as a result of climate change.

The impact on this SA Objective for Thematic Policies for Economy (EC1 – EC4) is uncertain, as although they support the creation of new development, the extent to which the new developments affect the District's vulnerability to climate change is dependent on the precise location and type of development.

Policies TR1- TR7, HO1 –HO10 and ID1 - ID3 all support the expansion of infrastructure and residential development, which would result in the loss of greenfield, the increase in impermeable surfaces and a potential increase in vulnerability to the impacts of climate change.

The Planning for Place and Communities (CO1 – CO3, EN1-EN10 and DS1 – DS5) policies generally have a negligible or slight positive impact on the SA Objective, as they tend to support the enhancement of green infrastructure and the implementation of sustainable design and construction techniques. Policies EN11- EN17 however negatively impact this SA Objective as they would encourage the creation and expansion of extraction sites, leading to permanent loss of vegetation and increased vulnerability to flooding.

SA Objective 5: Water Resources

Overall, the Strategic Policies (SP1- SP16) have a positive impact on the Water Resources SA Objective. SP9 in particular would ensure new developments minimise water consumption and maximise water recycling. SP2, SP6 and SP8 each encourage new residential development, which would increase the consumption of water, and SP5 supports development on the Green Belt and greenfield sites, which may increase the potential for pollution due to the proximity to natural watercourses.

The Economic Policies encourage employment and economic development, increasing water consumption and the potential for impacts on the quality of water resources. Similarly, The Housing Policies (HO1- HO10) support the expansion of residential development and therefore increases the risk of pollution or contamination of water bodies and potential water consumption.

There would be no discernible impact on this SA Objective for the Thematic Policies for Transport (TR1 – TR7).

Planning for Place and Communities Policies CO1 – CO3 and EN1 – EN10 support the protection of green infrastructure and natural landscape, thereby supporting natural water filtration and improving the ecological status of waterbodies in the District. Policy EN9 safeguards and aims to improve the quality of water resources in Bradford and therefore has a positive impact on the Water Resources SA Objective.

Policies EN11 – EN17 have a significantly negative impact on the Objective. The development and expansion of mineral expansion sites would significantly increase the consumption of water in the District and has the potential to cause a major pollution incident and contaminate natural waterbodies.

SA Objective 6: Biodiversity & Geodiversity

Strategic Policies SP1 – SP16 would have an overall positive impact on the SA Objective. SP9, SP10 and SP11 would each have a significantly positive impact due to facilitation and expansion of vulnerable habitats and green spaces, leading to improved ecological connectivity. SP12 would have a significantly negative impact, as the policy seeks to expand mineral extraction sites, resulting in the potential direct loss of habitats and a high risk of air and water pollution that would affect biodiversity.

Policies EC1 – EC4 would negatively impact the Objective, as the encouragement of new developments would lead to the potential loss of greenfield sites and the ecological value they provide.

Transport Policy TR2 would have a significantly positive impact on the SA Objective, as provisions within the policy for developments to account for environmental considerations would mean development on greenfield sites would be minimised and the impacts of the development mitigated.

Planning for Homes Policies HO1- HO10 would all have a minor negative impact as they encourage wide-scale residential development, putting pressure on habitats, with the exception of HO3, which aims to focus development on greenfield land.

Planning for Places and Communities Policies CO1 and EN1 – EN10 would have an overall beneficial impact on the SA Objective of Biodiversity and Geodiversity, as they encourage the preservation and expansion of open space, green infrastructure and the Green Belt. This would provide valuable ecological connectivity and support habitat protection across the District. Policies EN11 – EN17 all have significantly negative impacts on the SA Objective, as they support increased mineral expansion and would therefore reduce the quantity of valuable greenspace available for biodiversity. Policy EN18 would have a minor positive impact on the Objective, as requirements for landfill proposals include the provision that the land must be restored to be of high quality.

Policies DS1 –DS5 would overall have negligible impact on the SA Objective, with the exception of DS2, which would have a major positive impact due to provisions to protect and enhance habitats. Policies ID1 – ID3 each support infrastructure development and would therefore have a minor negative impact.

SA Objective 7: Landscape & Townscape

Strategic Policies SP1- SP16 would have a predominantly positive impact on the landscape and townscape, as the policies will protect and enhance the traditional distinctive landscape of the District.

EN1 – EN10 would include provisions for expanding green infrastructure and positively influencing the character of the landscape, expanding the landscape into the town centres and encouraging the integration of green infrastructure into Town Centre. Planning for Places and Communities Policies EN11- EN18 would all have a major negative impact on the SA Objective, as new and expanded mineral extraction sites would greatly influence the character of the District, discordantly with the existing landscape and townscape. EN12 would have a significantly negative impact due to the opportunity for new extraction sites.

Economic Policies EC1-EC4 encourage the expansion of employment sites, which has the potential to negatively influence the character of the District. Each policy tends to focus the development on existing sites, which would lessen the impacts of the policies on the character of the townscape as the developments would aim to regenerate areas and be in-keeping with the local character.

Policies TR1 – TR7 have an overall positive impact on the SA Objective, as each policy aims to reduce congestion on the roads through the encouragement of sustainable travel methods and design led approaches to infrastructure would improve the street scene of the District.

Planning Policies for Homes (HO1 – HO10) have the potential to have a positive or negative impact on the District, as the policies encourage the development and regeneration of housing stock, and may add or detract from the townscape, particularly if the development is on greenfield sites.

Policies DS1 – DS5 have an overall positive impact on the SA Objective, as they are likely to enhance the landscape and townscape while maintaining the character of the District and taking opportunities to regenerate areas would result in fewer areas of degradation in the District.

The outcome of the policy assessments for policies ID1 – ID3 is both positive and negative, and there is potential for the encouraged development to be on either greenfield or brownfield sites, and therefore may have either a positive or negative impact on the SA Objective of improving landscape and townscape.

SA Objective 8: Cultural Heritage

Throughout the Strategic Planning Policies SP1 – SP16, there are provisions for enhancing the character of the District and encouraging development to be consistent with the existing character of the District. Policies DS1 – DS5 have an overall positive impact on the SA Objective, as they are likely to enhance the landscape and townscape while maintaining the character of the District and taking opportunities to regenerate areas would result in fewer areas of degradation in the District.

Transport Policies TR1 – TR5 enhance sustainable transport links in the District, enhancing the setting of Conservation Areas. TR2 would ensure the protection built and natural environments, enhancing the protection of heritage assets. TR6 and TR7 would have negligible impact on the SA Objective.

Economic Policies EC1-EC4 encourage the expansion of employment sites, which has the potential to negatively influence the character of the District and the setting of heritage assets, potentially affecting views around Saltaire World Heritage Site. Each policy tends to focus the development on existing sites, which would lessen the impacts of the policies on the SA Objective as the developments would aim to regenerate areas and be in-keeping with the local character. Similarly, Housing Policies HO1- HO10 may positively or negatively impact the setting of heritage assets.

Planning for Place and Communities Policies CO1 and EN1 – EN10 would improve the setting of heritage assets by enhancing the natural environment and blending the boundaries of townscape and landscape.

The outcome of the policy assessments for policies ID1 – ID3 is neutral or negligible, as there is potential for the encouraged development to be on either greenfield or brownfield sites, and therefore may have either a positive or negative impact on the SA Objective of improving the setting of the heritage assets of the District.

SA Objective 9: Air Quality

Strategic Policies SP1 – SP16 have a varied impact on the SA Objective. SP3 and SP4 have a major positive impact, as they enhance the sustainability of development, including sustainable transport, and would therefore minimise the increase of private vehicles and air pollution. Policies SP5 and SP12 would encourage development on greenfield sites and would remove valuable green infrastructure that naturally filters air and improves air quality. Policy SP10 does the opposite of this and would have a major positive impact. Policy SP8 would have a significantly negative impact on the Objective, as the policy would increase the residential energy consumption and residential car use and has the potential to exacerbate air pollution issues.

Policies EC1 –EC4 would each have a minor negative impact, and the policies support the development of new employment sites and the increase in movements associated with the developments would increase air pollution.

The Transport Policies would have an overall positive impact on the SA Objective. The policies aim to increase uptake of sustainable transport links or reduce the need to travel, thereby minimising pollution from transport.

Housing Policies HO1 –HO10 would have a minor negative impact on the SA Objective, as an increase in residential development would also increase the use of cars, which would increase air pollution

Policies CO1 and EN1 – EN10 would increase the provision of open space and green infrastructure. These provide natural air filtration and improve the air quality of the District. CO3 would implement health impact assessments for major developments and may identify air quality issues and enable early mitigation for these. EN8 would implement air quality buffer zones, encourage sustainable transport and require Air Quality Assessments with major planning applications, and would therefore work to significantly improve air quality in the District.

EN Policies 11 – 17 would have a negative impact on the Objective. The expansion of extraction sites have the potential to increase air pollution, including aerosols, leading to worsening air pollution. EN18 – EN21 would have negligible impact on the Objective.

SA Objective 10: Transport

Policies Ec1 – EC4 may have a positive or negative impact on the SA Objective, as expansion of the sustainable travel network would minimise air pollution, but the increase in travel associated with increased employment opportunities would increase pressure on the transport system.

Transport Policies TR1-TR7 would significantly achieve the SA Objective. Each policy aims to integrate the transport system and make it more efficient, better suiting the needs of the District. The policies ensure the most appropriate form of transport for freight and increase the efficiency of movements.

Housing Policies HO1 –HO10 would have a major negative impact on the SA Objective. All the policy options would increase the number of residents in an area and would increase the pressure on the road and transport networks, including walking and cycling routes.

Policies EN1 – EN10 and CO1- CO3 aim to encourage sustainable transport methods but would otherwise have negligible impact on the Transport SA Objective. EN11 – EN17 would support the quarrying of materials in the District, and the associated HGV traffic would increase congestion throughout rural and urban locations.

SA Objective 11: Housing

Policies EC1 – EC4 would have a positive impact on the Housing Objective, and the increase in employment could make the construction of new homes more viable.

Transport Policies TR1- TR7 and EN1 – EN17 each have negligible impact on the Objective.

Housing Policies HO1 – HO10 would all have a major positive impact on housing in the District. The policies aim to increase the housing stock and ensure the consistency of the release of sites throughout the Plan Period. All the policy options expand the access to housing for all residents of the District and provide affordable housing.

Policy CO1 would improve the quality of housing stock by ensuring developments provide open spaces and recreational facilities.

SA Objective 12: Accessible Services

Economic Policies EC1- EC3 would have a minor positive impact, but EC4 would have a major positive impact on the SA Objective, as it aims to enhance the viability of the City and facilitate social mixing through the provision of recreation spaces.

Transport Policies TR1 – TR5 would increase the efficiency and integration of the transport network, increasing the accessibility of services across the District and the permeability of neighbourhoods. TR6 and TR7 would have negligible impact on the Objective.

Policies HO1 – HO10 may have a positive or negative impact on the SA Objective, as the additional housing supply in the District may encourage the provision of new services or expand on existing facilities or may increase the pressure on existing services.

Policies CO1 and CO2 would achieve the SA Objective through provision of new community spaces and facilities, encouraging socialising and strengthening local communities. Policies EN1 – EN10 overall have a positive impact on the SA Objective. The protection of important ecological habitats, including the South Pennines SPA/SAC, ensures that they will be available for all to access. Policy EN6 protects and expands Public Rights of Way, and supports rural tourism, ensuring access to rural spaces for residents and visitors. Policies EN11 – EN17 would have negligible impact on the Objective.

SA Objective 13: Social Cohesion

Economic Policies EC1- EC3 would have a minor positive impact, but EC4 would have a major positive impact on the SA Objective, as it aims to enhance the viability of the City and facilitate social mixing through the provision of recreation spaces.

Transport Policies TR1 – TR5 would increase the efficiency and integration of the transport network, increasing the accessibility of services across the District and the permeability of neighbourhoods. TR6 and TR7 would have negligible impact on the Objective.

Policy HO5 would provide affordable housing throughout the District, increasing social cohesion. All other HO Policies would potentially risk the balance of local communities or increase the service provision throughout the District, encouraging the improvement of communities.

Policies CO1 and CO2 each have a positive impact on the SA Objective. The provision of new community and recreation facilities would ensure accessibility for all residents and improve social equality and cohesion. Policies EN1 – EN6 manage and enhance landscapes in the District and ensure the provision of open spaces and encourage social cohesion. Policies EN11 – EN17 support the extraction of material in the District, and the associated jobs may decrease deprivation levels in the area and improve social cohesion.

SA Objective 14: Culture & Leisure

Economic Policies EC1- EC3 would have a minor positive impact, but EC4 would have a major positive impact on the SA Objective, as it aims to enhance the viability of the City and facilitate social mixing through the provision of recreation spaces.

Policies TR1 – TR5 would increase the accessibility of culture and leisure facilities across the District through improving and integrating the Transport system.

Policies HO1- HO10 would have either a positive or negative impact on the SA Objective, as significant residential development would bring new residents closer to culture and leisure facilities, which might encourage their growth or increase demand.

Policies CO1 and CO2 would provide new recreation facilities and would therefore have a major positive impact on the SA Objective. Similarly, EN1 – EN6 protect and enhance public spaces and access routes and increase the accessibility

of rural leisure for the local population.

SA Objective 15: Safe & Secure

Policies EC1- EC4 would have a negligible impact on the SA Objective.

Transport Policies TR1 – TR7 would all make improvements to the infrastructure of the District, and the regeneration would ensure the safety of the travel infrastructure. Enhancing walking and cycling options further increases the safety of the options for walkers and cyclists.

The HO Policies may have a positive or negative impact on the SA Objective. The policies would provide safe and affordable housing across the District, or the bringing together of communities may increase the crime rate. It is likely that through HO9, in combination with DS1 and DS5, that achieving good design and high standards of housing will increase the safety of neighbourhoods.

Policies CO1 – CO3 and EN1 – EN21 would have a negligible impact on the SA Objective.

SA Objective 16: Health

By expanding the cycling and walking networks, Policies TR1, TR3 and TR4 would make active travel more attractive, improving the physical and mental wellbeing of the users.

Policy HO7 would ensure the provision of housing for older or disabled people, improving their access to healthcare. The other HO Policies would provide a positive or negative impact, as they would increase residents in an area and potentially increase strain on health services.

Policies CO1 – CO3 and EN1- EN7 would each have a major positive impact on the SA Objective. The provision of new recreation facilities and open space encourage physical exercise and improve mental wellbeing. CO3 advocates for the inclusion of health impact assessments, which would confirm developments would not have a detrimental impact on the health of local residents. EN8 would create air quality buffer zones and seeks to reduce air pollution with the aim of benefitting physical fitness. The potential for air quality issues resulting from the extraction of materials supported in Policies EN11- EN17 would have a minor negative impact on the SA Objective.

SA Objective 17: Education

Each economic policy (EC1-EC4) would have a positive impact on the SA Objective. The policies would significantly improve employment opportunities for local people, increasing the availability of learning applicable skills.

Transport Policies would have a minor positive impact on the SA Objective, as they would increase the accessibility of education facilities.

The housing policies would produce significant residential development, which may increase pressure on education facilities, or ensure the provision of new facilities in the region. An additional policy would be required to ensure education facilities are adequate for demand. Policy CO2 would ensure the provision of education facilities and minimise the pressure on existing facilities and allow accessibility of education for all.

Policies EN1 – EN17 would have negligible impact on the SA Objective.

SA Objective 18: Employment

Policies EC1 –EC4 would all have a major positive impact on the Employment SA Objective. All policies are likely to contribute to significant and regenerative economic growth, increasing the local employment rates, average earnings and increasing the average spend. Each policy is likely to create new jobs appropriate for the local urban or rural setting.

Transport Policies TR1 – TR7 would each increase access to employment facilities by expanding and improving the travel network.

Policies HO1-HO10 would have a major positive impact on the SA Objective. Significant residential development increases the number of residents and provides them with good access to Bradford's employment market.

Planning for Places and Communities Policies would overall have a slight positive or neutral impact on the SA Objective. Provision of recreation space would provide the opportunity for limited jobs.

Policies EN1 –EN9 would have negligible impact on the SA Objective. EN10 would seek investment in renewable and low carbon energies, potentially encouraging employment opportunities in those sectors. EN11 - EN17 would each

support job creation through the expansion of mineral extraction sites.

SA Objective 19: Economy

Policies EC1 –EC4 would all have a major positive impact on the Employment SA Objective. All policies are likely to contribute to significant and regenerative economic growth, increasing the local employment rates, average earnings and increasing the average spend. Each policy is likely to create new jobs appropriate for the local urban or rural setting.

Transport Policies TR1 – TR7 would increase the access to sustainable travel links, improving the access to City and Town Centres, increasing footfall and boosting the local economy and increasing the viability of centres.

Housing Policies HO1- HO10 support the provision of housing growth, providing construction jobs and bringing in local populations to support the expansion of businesses and boost the local economy.

Policies CO1 – CO3 would have a slight positive or neutral impact on the SA Objective. The provision of open space may boost tourism to the area, and in turn may boost the local economy. Policies EN1, EN6 and EN8 would have negligible impact on the SA Objective. Other EN Policies would reduce the occurrence of flood events and reduce losses from these events. EN11 – EN17 would boost the local economy through the quarrying of local material, but the unsustainable nature of the work due to the finite material may mean the jobs are short-lived.

NTS-2: Summary of SUEs assessment results for each SA Objective

SA Objective 1: Energy & GHGs

All SUE options alternatives were identified as likely to have a minor adverse effect in relation to SA Objective 1. As the total number of dwellings to be delivered in the Local Plan is fixed, and therefore, although the volume of greenhouse gases emitted due to new development is expected to increase, it would not vary significantly should one SUE option be chosen over another. However, the larger SUEs are likely to have greater potential for the viable delivery of sustainable design solutions, such as accommodating renewable energy generation, district heating, or allocating spaces within SUEs for open space and habitats.

SA Objective 2: Waste

For SA Objective 2, all SUE reasonable alternatives were identified as likely to have a minor negative effect. The construction and occupation of the new dwellings would be expected to increase waste generation arising at each location in relation to existing levels. Overall, the total number of dwellings to be delivered across Bradford is fixed, thus it is considered that the overall amount of waste generated would not vary significantly should one SUE option be chosen over another.

SA Objective 3: Land & Buildings

The development of the South Bierley, Holme Wood, West of Cross Hill and Thackley SUEs may give rise to a major negative effect in relation to SA Objective 3. While all SUEs are situated almost entirely on greenfield land and coincide with coal, or coal and sandstone, Mineral Safeguarding Areas, these four SUEs are also located on Grade 3 Agricultural Land Classification (ALC) soil, which may potentially contain Best and Most Versatile (BMV) agricultural soils. Development at these locations could therefore be expected to result in significant levels of soil loss (e.g., through excavation, compaction, or contamination) while potentially sterilising valuable mineral resources.

SA Objective 4: Climate Change Resilience

All six SUE options are located in Flood Zone 1 and so would situate residents in areas of very low fluvial flood risk. Whilst there are typically small stretches of land with high surface water flood risk at each SUE due to small natural waterbodies, it is expected that development would avoid this land, in line with Local Plan policies. The key concern with flood risk for these SUEs is considered to be the replacement of greenfield with hardstanding. The replacement of permeable soils and infiltrating vegetation with buildings and infrastructure would alter overland flow and could exacerbate surface water flood risk downslope. Local Plan policies require flood risk to not be altered by new development, but it is likely going to be difficult to avoid this entirely when the development is of this scale and on this land. This would be mitigated to some extent by Local Plan policies requiring Green Infrastructure (GI) to be preserved

and enhanced where possible, and for SuDS to be incorporated into each development.

SA Objective 5: Water Resources

None of the SUE options coincide with a groundwater Source Protection Zone (SPZ), however, Clayton Heights and Thackley also do not coincide with a natural water body, but Thackley is located in close proximity to the Leeds and Liverpool Canal, and therefore, Clayton Hill is the option best placed to avoid adverse impacts on water quality.

SA Objective 6: Biodiversity & Geodiversity

Each SUE was recorded as having a negative effect on biodiversity. This is primarily due to the significant loss of greenfield that is an important element of the wider GI and habitat networks (including grassland and woodland). The impact would potentially be greater the greater the size of the SUE. It is recognised that Local Plan policies would help to avoid and mitigate many potential effects on biodiversity. By pursuing SUEs of these scales, there would also likely be opportunities for including open space and areas of protected habitats that help to preserve the biodiversity value of the SUE as well as its role in the connectivity of the wider ecological network.

SA Objective 7: Landscape & Townscape

None of the reasonable alternatives would be expected to impact on sensitive landscape designations, such as National Parks or AONBs. However, all but West of Cross Hill are located wholly or partially within the Green Belt. Given the scale of the development being proposed at large greenfields in countryside locations, it is likely that alterations to the local landscape character would be difficult to entirely avoid or mitigate.

SA Objective 8: Cultural Heritage

Within the site perimeter of the West of Cross Hill and Holme Wood alternatives are Grade II* Listed Buildings, in addition to a range of Grade II Listed Buildings. Major adverse impacts on the setting of these sensitive assets are likely due to the replacement of greenfield with built form. These alternatives would therefore be likely to have a more severe impact on the cultural heritage SA Objective than other SUE options, which would be expected to alter the setting of Grade II Listed Buildings. It is recognised that through careful design and mitigation, it may be possible to reduce predicted negative effects.

SA Objective 9: Air Quality

None of the SUE options are coincident with an Air Quality Management Area (AQMA) or Clean Air Zone (CAZ). However, there is a risk that, given the scale of the proposed development, residents may drive through an AQMA or CAZ to access the development and this could make achieving air quality improvement targets more difficult.

SA Objective 10: Transport

Allerton, Clayton Heights, and Holme Wood SUEs would be likely to have minor negative effects in relation to transport, due to access to poor access to a bus stop with frequent services, railway stations, the Public Right of Way (PRoW) network, and safe pedestrian and cycling routes. South Bireley, West of Cross Hill and Thackley SUEs would be likely to result in minor positive effects in relation to transport.

SA Objective 11: Housing

All SUE options would deliver a major boost towards satisfying Bradford's housing needs, helping to accommodate its varied and growing population. However, it is recognised that Holme Wood and Thackley would deliver the highest number of dwellings.

SA Objective 12: Accessible Services

Access to key services and amenities at each SUE option is somewhat varied, with access appearing to be being the most limited at the Allerton and South Bireley SUEs, which could potentially result in minor positive effects, and the least limited at the Clayton Heights, Holme Wood, West of Cross Hill and Thackley SUEs, which could potentially give rise to significant beneficial effects in relation to accessible services.

SA Objective 13: Social Cohesion

It is expected that in each case the provision of new houses and associated infrastructure at each location would enable new residents to participate in an existing local community whilst avoiding development of a scale or type that destabilises these communities. Therefore, all SUE options would be likely to result in a major positive effect in regard to social cohesion.

SA Objective 14: Culture & Leisure

Each SUE option would be likely to provide new residents with opportunities to partake in local cultural activities to some extent, whilst the City also offers an excellent and diverse range of cultural spaces that are generally highly accessible via public transport for any new residents.

SA Objective 15: Safe & Secure

All SUEs were identified as giving rise to neutral effect in relation to SA Objective 15 because each SUE is predominantly greenfield and so new development at these locations could attract new crime at locations where there is currently relatively little. However, Local Plan policies would help to ensure that new development incorporates safety and security principles, such as through safe lock up, encouraging community interactions and enabling high rates of natural surveillance.

SA Objective 16: Health

All SUEs are well situated to allow residents to pursue healthy and active lifestyles, generally being in proximity to GP surgeries, leisure centres/sports facilities, a diverse range of semi-natural habitats accessible via the Public Right of Way (PRoW) network and hospitals in the City. Due to the large size of the SUEs, it would be likely that some new residents at all SUEs would be outside of the target distance of a GP surgery. However, Local Plan policies would be expected to ensure that new or enhanced health care facilities are provided where necessary, and therefore, minor positive effects have been identified for all SUEs.

SA Objective 17: Education

For the Clayton Heights and South Bierley SUEs, access to primary schools is generally good, however, access to secondary schools would be outside of the target distance. At the Allerton SUE, the majority of residents would be outside the target distance of primary and secondary schools. The opposite is true for the Holme Wood, West of Cross Hill and Thackley SUEs, where residents would be likely to have excellent access to both primary and secondary schools. It is uncertain at this stage if all schools have the necessary capacity to accommodate new development. Policy CO2 seeks to ensure that there is sufficient educational infrastructure to support housing growth, and where appropriate, developer contributions could be sought in line with Local Plan policies.

SA Objective 18: Employment

Access to employment zones at each SUE option is generally good. Allerton is more distant from employment opportunities than the other options, but given each option is an extension to the City of Bradford, at which there is a major and diverse range of high-quality employment opportunities, it is likely that residents would still have good access to jobs. Holme Wood is also proposed for the development on 9.06ha of employment land. All SUE options would be likely to result in significant positive effects in relation to employment.

SA Objective 19: Economy

It is currently unknown if all of the SUE options would include new employment land and economic enterprises. The proposed development at Holme Wood is proposed to include employment land covering 9.06ha. It is expected that the construction and occupation of new homes and potential new employment land would help to enhance the vitality and viability of communities and town centres on the edge of Bradford, while also providing a temporary boost to the local construction sector. As a result, all SUEs have been identified as having the potential to give rise to positive effects in relation to the economy, with Home Wood having the potential to result in significant beneficial effects.

NTS-3: Summary of sites assessment results for each SA Objective

SA Objective 1: Energy & GHGs

Development is likely to increase energy consumption and the level of greenhouse gas emissions released into the atmosphere, which contribute to climate change.

SA Objective 2: Waste

With regards to the construction phase, development will increase the demand for building materials. The use phase of development is likely to increase the amount of waste generated.

SA Objective 3: Land & Buildings

Overall, a growth in housing and employment development is likely to result in the loss of greenfield land. However, all site allocations in the City Centre are brownfield sites. There is a relatively higher proportion of brownfield site allocations in North Bradford and Shipley, compared to other areas.

Some sites are located on Agricultural Land Classification grade of 3 (good to moderate quality) and may include Best and Most Versatile (BMV) land.

A number of sites occupy Mineral Safeguarding Areas.

SA Objective 4: Climate Change Resilience

There are sites which include areas of low, medium and/or high surface water flood risk.

There is also a small number of sites located within medium to high fluvial flood risk zones. It may be possible for development of these sites to entirely avoid areas of medium to high flood risk.

SA Objective 5: Water Resources

A number of sites have a surface waterbody within the site or directly adjacent to it, in these instances, there is a potential risk to water quality and the ecological and chemical status of these surface waterbodies, due to the development of these sites.

SA Objective 6: Biodiversity & Geodiversity

A number of sites are located within the Natural England Green Infrastructure corridor. Development of some of the sites could potentially directly or indirectly affect priority habitat, Tree Preservation Order (TPO) woodland and Ancient Woodland.

Some sites within Wharfedale, Airedale, Canal Road and Pennine Towns and Villages lie within a SSSI Impact Risk Zone.

A Habitats Regulations Assessment of the draft Local Plan has been undertaken. At present, it is not possible to rule out likely significant effects on the South Pennine Moors SAC/SPA/SSSI. Potential impact pathways are urban effects, impacts on supporting habitat, recreation and air quality. The HRA report sets out appropriate mitigation measures and further assessment requirements.

SA Objective 7: Landscape & Townscape

Growth in development is likely to result in the loss of open greenfield that contains green infrastructure elements and Green Belt designated areas of potentially high visual amenity.

There are sites, however, where development is likely to have a positive effect on landscape and townscape. Due to the current state of some sites and their surroundings, development could provide an opportunity to enhance the local landscape and townscape.

Some sites in Wharfedale are within 2km of Nidderdale Area of Outstanding Natural Beauty (AONB) and the Yorkshire Dales National Park. Overall, however, development would not be expected to have a discernible impact on or alter views into or out of the AONB or the National Park, largely due to the presence of intervening built form.

SA Objective 8: Cultural Heritage

A number of potential housing sites in North Bradford and Airedale fall within the Saltaire World Heritage Site Buffer Zone.

In some cases, potential development could present an opportunity to preserve, restore and enhance a heritage asset, and improve its setting through a sensitive, well-designed scheme.

SA Objective 9: Air Quality

A growth in housing and employment development is likely to lead to an increase in air pollution. A number of sites in Shipley and North Bradford are located in the proposed Clean Air Zone (CAZ), and several more sites are in close proximity to the CAZ. Several sites are also in close proximity to Bradford's Air Quality Management Areas (AQMA).

SA Objective 10: Transport

The majority of sites offer good access to public transport infrastructure as well as good pedestrian and cyclist access.

SA Objective 11: Housing

A growth in housing development would contribute towards satisfying Bradford's housing needs. (This depends on the types and tenures of the housing provided being in line with the Local Plan policies.)

SA Objective 12: Accessible Services

Development locations are expected to offer good access to key services, amenities and facilities, this is particularly applicable to sites located in North Bradford, South Bradford and Airedale.

SA Objective 13: Social Cohesion

The majority of site allocations would situate new residents within an existing community, encouraging participation and community interaction, without the development being of a scale that may put pressure on local services and facilities or could alter the local sense of community and place.

SA Objective 14: Culture & Leisure

The majority of the site locations would enable future residents to access a range of culture, leisure and recreation activities.

SA Objective 15: Safe & Secure

The construction and occupation of new homes and businesses would introduce new potential targets and victims of crime at a location where there may currently be none, therefore an increase in crime at the site cannot be ruled out. However, new development could potentially increase natural surveillance, and so could help to combat the local risk of crime.

SA Objective 16: Health

Due to the location of the site allocations, new and existing residents would be expected to have good access to health facilities, including hospitals and GP surgeries, recreational, as well as exercise opportunities, social spaces and a diverse range of semi-natural greenspace.

However, depending on the location of development in relation to healthcare facilities, there could be a risk of the capacity of these facilities being placed under increasing pressure.

SA Objective 17: Education

Due to the locations of the site allocations, new and existing residents would be expected to have good access to education facilities, including primary and secondary schools. Local Plan policies would ensure that new development

would not proceed without there being appropriate capacity of school places and thus the assessments of sites can assume that nearby schools would have appropriate capacity to accommodate new residents or new additional provision would be provided in the form of a new school.

The provision of new employment land could offer learning opportunities and bolster the workplace skills of local people and employees.

SA Objective 18: Employment

Overall, housing development would enable future residents to have good access to employment opportunities.

Employment development would provide new employment opportunities in Bradford.

SA Objective 19: Economy

A growth in development is likely to lead to an increased demand for local goods and services. Development is also likely to enhance the pool of potential employees for local businesses.

Overall, development on the potential employment sites would contribute to the long-term success of Bradford's economy and provide a boost to the vitality of local areas.

Recommendations

Alongside the assessment results, recommendations have been made that would help to avoid or minimise the negative effects, as well as enhance the positive effects.

Next steps

The Bradford Draft Local Plan, along with this Interim SA Report, will be consulted on between Wednesday 10th February 2021 and Wednesday 24th March 2021. The Draft Local Plan will then be further refined and updated to form the Publication Version. At the same time, the SA will be updated and refined in line with any changes made to the Draft Local Plan. The Publication Bradford Local Plan and Final SA Report will then be consulted on once more before being submitted to the Secretary of State for consideration.

1 Introduction

1.1 Background

The City of Bradford Metropolitan District Council (the Council) is in the process of preparing a new Bradford Local Plan (hereafter referred to as the Local Plan). In April 2019, Arcadis Consulting UK Ltd (Arcadis) was commissioned to provide Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) services to assist with the Council's Plan-making.

This document constitutes an Interim SA Report to accompany Regulation 18 Consultation on the Draft Local Plan.

1.1.1 The Current Development Plan

Several documents combined currently form the statutory development plan for Bradford District (the District). This includes the following documents:

- Core Strategy DPD¹ adopted on 18 July 2017, which sets out broad aims and objectives for sustainable development in Bradford as well as broad policies for guiding development and broad locations for new housing, employment and infrastructure (without allocating specific sites for development);
- Bradford City Centre Area Action Plan² (AAP) adopted on 12 December 2017, which guides the regeneration of Bradford City Centre up to 2030;
- Shipley and Canal Road Corridor AAP³, adopted on 12 December 2017, which guides the regeneration of the Shipley and Canal Road Corridor up to 2030; and
- Bradford Waste Management DPD⁴, adopted 17 October 2017, which provides a spatial plan and policies for sustainable waste management in Bradford.

1.1.2 The Adopted Core Strategy

In February 2007, the Council produced a series of topic papers, setting out the issues and options grouped into key themes:

- Paper 1: Introduction and Background;
- Paper 2: The Spatial Vision and Strategy for Bradford;
- Paper 3: Meeting the Needs for Dwellings in the Districts;
- Paper 4: Economy and Jobs;
- Paper 5: Transport and Accessibility;
- Paper 6: Community Facilities;
- Paper 7: Environment; and
- Paper 8: Waste Management.

The topic papers were made available to the public for comment between February and July 2007. Following consideration of the representations received, and in response to changes to the Yorkshire and Humber Plan - the Regional Spatial Strategy (RSS)⁵, the Council felt it necessary to put forward a number of more detailed

¹ Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/> [Accessed 27.01.21]

² Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/city-centre-action-plan-documents/> [Accessed 27.01.21]

³ Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/shipley-and-canal-road-corridor-area-action-plan-dpd/> [Accessed 27.01.21]

⁴ Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/waste-management-dpd/> [Accessed 27.01.21]

⁵ Accessible online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/the-yorkshire-and-humber-plan/> [Accessed: 27.01.21]

options to accommodate development. A Further Issues and Options document was, therefore, produced, which focused specifically on key elements of the Core Strategy, namely the spatial vision, strategic objectives and spatial options for the location of development. This was followed by a Further Engagement Draft in October 2011. Community involvement and engagement took place at each stage to ensure that the Council produced a Core Strategy that met the needs of all its stakeholders and the local community.

The Core Strategy DPD, which was successfully adopted on 18 July 2017, is an essential part of the Local Plan for Bradford. It sets out the strategic housing, employment, transport, retail, leisure and environmental policy requirements for the District and provides context for the scale, location and distribution of development, including site allocations (but does not allocate specific sites itself).

The Core Strategy includes a spatial vision for how different parts of the District will change. It sets out Strategic Core Policies and Sub Area Policies that determine the scale of development required to meet objectively assessed needs, the broad pattern of development to be accommodated and how this growth will be distributed between different areas. It also shapes where new employment, retail development, leisure and recreational facilities, transport infrastructure and supporting other community infrastructure are needed. The Core Strategy also sets out development management related policies spread across the themes of:

- Economy and jobs;
- Transport and movement;
- Housing;
- Environment;
- Minerals;
- Waste;
- Design; and
- Implementation and delivery.

1.1.3 Creation of a New Draft Local Plan

Following updates to national planning policy, particularly that which is related to calculating housing needs and Green Belt protection, the Council determined that the creation of a Local Plan, to incorporate both proposed policies and sites, was appropriate. The emerging Draft Local Plan would also be an opportunity to consider local policy changes including the adoption of a new economic strategy.

The intention of the review is to prepare a Local Plan that would replace the existing Core Strategy 2017.

“The Local Plan is designed to be an integrated strategy including a vision with strategic objectives and a focused set of strategic and development orientated planning policies. The relevant policies together with additional information on local socio-economic factors have been used to structure profiles for each settlement within the District and a set of area strategies. These strategies contain information on important local features and preferred site allocations - primarily housing and employment. Each preferred site allocation also has a pro forma which provides detailed information about key constraints, opportunities and why the site is suitable for allocation”.

Figure 1-1 shows the plan-making process to date and how previous stages of the process have been used in the preparation of the Draft Local Plan.

Figure 1-1: Plan-making process to date



The Bradford Draft Local Plan is an integrated single plan with the following sections:

- **Section 1: Welcome** – background to the Draft Local Plan including key directions, and approach to consultation.
- **Section 2: Introduction** – including the district portrait, spatial vision and strategic objectives.
- **Section 3: Strategic Policies** – high level strategic policies which set out the overall core land use planning directions for the district.
- **Section 4: Thematic Policies** – detailed planning policies covering the economy, transport, housing, environment and infrastructure.
- **Section 5: Local Area Profiles and Allocations** – local area information, areas strategies and allocation detail.
- **Section 6: Implementation, Delivery and Monitoring** – infrastructure planning, viability, delivery and performance monitoring.

1.2 Sustainability Appraisal and Strategic Environmental Assessment

1.2.1 Sustainability Appraisal

The Council, as the local planning authority (LPA), is legally required to carry out an SA of their Plans by Section 19 of the Planning and Compulsory Purchase Act 2004⁶. The Town and Country Planning (Local Planning) (England) Regulations 2012⁷ dictate that after adopting a plan the LPA must make the SA Report available.

SA is a mechanism for assessing the extent to which an emerging plan promotes sustainable development by applying a holistic assessment of the likely effects of the plan on social, economic and environmental objectives.

1.2.2 Strategic Environmental Assessment

SEA is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004⁸ (the SEA Regulations). These regulations originally transposed the Directive 2001/42/EC on the

⁶ Available online at: https://www.legislation.gov.uk/ukpga/2004/5/pdfs/ukpga_20040005_en.pdf [Accessed 27.01.21]

⁷ Available online at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Accessed 27.01.21]

⁸ Available online at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Accessed 27.01.21]

assessment of the effects of certain plans and programmes on the environment⁹ (SEA Directive) into UK law. The UK has since left the European Union; however, the SEA Regulations still apply.

As per Annex 1 of the SEA Directive, SEA is a systematic process designed to:

“Provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.

1.2.3 Integrated SA/SEA

National Planning Policy Guidance (NPPG)¹⁰ states that SA should incorporate the requirements of the SEA Regulations. This is because of the similarities between SA and SEA and the opportunities an integrated approach provides for avoiding repetition. This SA of the Draft Local Plan therefore integrates the requirements of SEA (and is from here on referred to in this report simply as the SA). The SA process will appropriately culminate in the Final SA Report that also satisfies the requirements of an SEA Environmental Report. In addition to NPPG, this integrated SA/SEA process is in accordance with ‘A Practical Guide to the Strategic Environmental Assessment Directive’¹¹ published by the Office of the Deputy Prime Minister in 2005.

As this document is an Interim SA Report it is not intended, and is not able, to fully satisfy the requirements of an SEA Environmental Report at this stage. The assessment has taken into account the information available at this time, and a further iteration will be undertaken, following public consultation. This will take into account changes to the Draft Local Plan, as well as comments on the SA itself.

1.2.4 SA/SEA and Plan-making

SA is an iterative process which, over several stages and potentially multiple reports, assists an LPA with achieving sustainable development in their plan-making. This is by predicting and evaluating the likely sustainability impacts (including environmental, social and economic impacts) of options being considered for the Plan (including individually and cumulatively) so the LPA can make informed choices over which options to pursue. The SA also provides recommendations to the LPA which, if adopted, would help to avoid or mitigate potentially negative sustainability effects to enhance potentially positive effects. It is expected that the SA will make a meaningful contribution towards ensuring that the Draft Local Plan delivers sustainable development in Bradford. However, the Council and the Draft Local Plan preparation process is being informed by a diverse range of evidence bases, such as that which is related to the development needs of Bradford or the land available for development, and this will also inform the Council’s decision making process over which options to pursue in the Draft Local Plan.

Table 1-1 provides an overview of where this SA Report sits in relation to the SA of the Local Plan. This Interim SA Report constitutes a key element of Stage B as it provides appraisals and recommendations to help the Council develop and refine their alternatives for the Plan. This document is also an early indication of what the SA Report referred to in Stage C will contain.

⁹ Available online at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Accessed 27.01.21]

¹⁰ Available online at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed 27.01.21]

¹¹ Available online at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Accessed 27.01.21]

Draft Local Plan – Interim SA/SEA

Table 1.1: SA of the Bradford Local Plan

Plan Stage	SA & SEA Stage	SA & SEA Requirements	Completed
Evidence Gathering and Issues and Options	Stage A. Setting the context and objectives, establishing the baseline and deciding on the scope	A1: Identify related plans/programmes	SA Scoping Report consulted on January – February 2019 and finalised in April 2019 following responses
		A2 & A3: Identify environmental protection objectives	
		A2 & A3: Baseline data and likely future trends	
		A2 & A3: Identify sustainability issues and opportunities	
		A4: Develop objectives, indicators and targets (SA Framework)	
		Prepare SA Scoping Report	
		A5: Consult on the SA Scoping Report	
Draft Local Plan for Regulation 18 consultation	Stage B. Developing, refining and appraising alternatives and assessing effects	B1: Test the Local Plan Objectives & Vision against the SA Objectives	Undertaken in this Interim SA Report, February 2021
		B3 & B4: Assess Local Plan options, including their reasonable alternatives	
		B5: Propose mitigation and enhancement measures	
		Prepare Interim SA Report	
Submission version of the Local Plan for Regulation 19	Stage C. Preparing SA Report	B3 & B4: Identify changes to Local Plan since previous stage and assess significance	<i>Stage to be completed</i>
		B6: Propose monitoring programme	
	Prepare Non-Technical Summary (NTS)		
	Stage D. Consultation on SA Report	C: Update all other elements to the SA Report in light of the changes to the Plan	
		C: Ensure the SA Report is compliant with the SEA Regulations in terms of requirements for an Environmental Report	
D: Consult on the SA Report			
Examination	Stages C & D. Update and amend report in light of any Modifications to the Local Plan	B3 & B4: Determine the relevance of any Modifications made to the Plan as an outcome of Examination and assess these	<i>Stage to be completed</i>
		Prepare addendum to the SA Report addressing the Main Mods and assess impacts	
Adoption	Stage E. Adoption Statement		<i>Stage to be completed</i>

1.3 Habitat Regulations Assessment

The Conservation of Habitats and Species Regulations 2017 (as amended, hereafter referred to as the ‘Habitats Regulations’) stipulate that a HRA must be carried out on all Plans and Projects that have the potential to impact upon sites designated for supporting habitats or species of international importance, otherwise known as Natura 2000 or European designated sites. In the UK, the requirements of the Habitats Regulations are also extended to consider the effects on Ramsar sites (listed under the Ramsar Convention on Wetlands of International Importance). The presence of Natura 2000/Ramsar sites within Bradford, and the potential impacts that could arise as a result of implementation of the Local Plan, requires that assessment under the Habitats Regulations is carried out.

The Council have commissioned Footprint Ecology to prepare an HRA for the Draft Local Plan to identify risks caused by the Plan for European sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

HRA screens the Plan to determine if a likely significant effect (LSE) on the conservation status of a European site can be objectively ruled out. If not, the HRA proceeds from the screening to an appropriate assessment of the LSE to establish its likelihood and appropriate measures for avoidance and mitigation.

At its current stage, the HRA has not been able to rule out an LSE on Natura 2000 sites caused by policies SP8 (Housing Growth); SP11 (South Pennine Moors); EC1 (Employment Land Delivery and Strategic Sites); HO1 (Housing Delivery, Strategic Sites and Managing Growth); EN15 (Managing Development of Mineral Sites); CO1 (Open Space, Sport and Recreation); and ID2 (Developer Contributions). The Preferred Site Allocations where a Likely Significant Effect is considered likely are listed in the HRA Report. These sites were carried through to appropriate assessment, which is documented in the HRA Report. It is expected that the HRA will now proceed to an appropriate assessment to be prepared in advance of Regulation 19 consultation on the Local Plan.

These findings have also been reflected in the SA assessments in Appendices F and G.

2 Stage A: Scoping Report

2.1 Context, Objectives, Baseline and Scope

This chapter provides detail on the statutory requirements, best practice and the results for Stage A, which is typically referred to as the Scoping Stage. The Scoping stage involves completing Tasks A1, A2, A3, A4 and A5 (refer to Table 1.1) and presenting the results in a distinct, accessible and concise Scoping Report that is consulted on (although a Scoping Report is not a statutory requirement, it is accepted as best-practice).

Stage A of the SA of the Local Plan (previously referred to as the Core Strategy Partial Review) has been carried out and documented in the SA Scoping Report that was consulted on between January and February 2019 and finalised in April 2019. The below boxes summarise the requirements for Stage A for the SA of the Local Plan.

The spatial scope of the SA is the District of Bradford. Transboundary effects will also be accounted for where feasible.

Strategic options, policies, strategic site allocations, site allocations, as well as their reasonable alternatives, being considered for inclusion in the Local Plan have been appraised for their likely short-term, medium-term and long-term effects. Effects are also noted for their reversibility or their permanence. Whilst the majority of the identified effects will be likely to only last for as long as the Local Plan is in place for (it is expected that it will be updated or replaced by a new Local Plan, or similar planning document, in the future), many effects may reside until long after the Local Plan is replaced. The temporal scope is therefore unlimited.

The technical scope of the SA is limited to the requirements of SA and SEA integrated into one process. All options will be appraised against all SA Objectives in the SA Framework (see below). This accounts for all topics listed in Schedule 2 of the SEA Regulations as well as other elements of social and economic sustainability considered to be pertinent to Bradford. The topic of 'Material assets' is broad and can be considered to account for both natural assets such as minerals, woodland and agricultural land, and built assets such as infrastructure, buildings and manufactured goods. Most SA Objectives can therefore be seen as having some degree of relevance to material assets.

2.1.1 Relevant Policies, Plans & Programmes

Task A1: Identifying other relevant policies, plans and programmes and SA Objectives

SEA Regulations (Schedule 2(1)) states:

“(1) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; ... (5) the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme...and the way those objectives and any environmental considerations have been taken into account during its preparation”

It is therefore an essential requirement, as well as a necessary component of preparing a robust and accurate appraisal, to understand the policy context in which the SA is being prepared.

The first task of Stage A involves satisfying the requirements of the SEA Regulations to clearly describe related plans and programmes that influence the production of the Local Plan. It is noted that there is a raft of international and national policy that will have an indirect influence on the Local Plan. For the purposes of the Scoping Report, it is considered that these have been translated into more immediately relevant strategic national and local documents. Relevant policies, plans and programmes (PPPs) were identified at International, European, National, Regional and Local scales, the full list of which is presented in Appendix A. It will be necessary for the Local Plan, as well as its accompanying SA process, to conform with the legal requirements of these PPPs as well as best practice.

The detailed review of relevant PPPs can be found in **Appendix A**.

2.1.3 Baseline data and key sustainability issues

Tasks A2 and A3: Collecting baseline information and identifying sustainability issues and opportunities

SEA Regulations (Schedule 2) states:

“(2) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; (3) the environmental characteristics of areas likely to be significantly affected; (4) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC... and the Habitats Directive.”

Baseline information refers to the existing economic, social and environmental characteristics of an area that may be affected by the Local Plan. It informs the development of a set of objectives, based on the data gathered, to inform the SA and plan preparation. Among the important decisions considered during the Scoping stage was with regards to the data, quantity of data and how should it be used in order to carry out SA. The review of plans and programmes (A1) and the gathering of baseline data (A2) facilitates the identification of key sustainability issues and opportunities (A3) in the District.

Baseline information detailing a range of social, economic and environmental data was obtained from a number of sources. Collectively this data was used as the baseline for identifying key sustainability issues and determining objectives for the Local Plan.

The second task of Stage A is comprised of collating baseline information relating to the current social, economic and environmental characteristics relevant to Bradford District. It provides the basis for predicting and monitoring the likely effects of a plan – in this case the Local Plan - and identifying key sustainability issues and opportunities of relevance to land use planning. The SA should take into consideration the best available data at a level of detail appropriate to the scale of the Plan but should not seek to gather or prepare primary data.

Schedule 2(6) of the SEA Regulations sets out a number of topics that must be considered and presented, which are:

- Biodiversity;
- Population;
- Human health;
- Fauna;
- Flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage, including architectural and archaeological heritage;
- Landscape; and
- The interrelationship between these factors.

To allow linkages, trends and patterns within the baseline information to be identified, baseline data gathered during the Scoping stage was broken down into a number of broad topic areas, reflecting those listed above:

- Communities, Population & Housing;
- Health & Inequalities;
- Economy;
- Natural Environment;
- Built Environment;

- Connectivity & Infrastructure; and
- Resources.

The detailed review of relevant baseline information can be found in Appendix B.

The baseline data was analysed to identify the key sustainability issues in the District for each broad topic area. The range of identified issues was highly diverse and is present in full in Appendix B.

2.1.4 SA Framework

Task A4: Developing the SA Framework

Based on the baseline data and key issues and opportunities for the Plan area, an SA Framework should be prepared comprised of Objectives that are fundamentally linked to the baseline data and issues and opportunities. It is important that the SA Objectives that are to be used are up-to-date, relevant for the plan area and can also provide a consistent approach between strategic level policies and site/area specific policies as part of the Plan. The SA Framework enables the Council to consider the impacts and alternatives of plans, programmes and policies.

The SA Framework that emerged from the SA Scoping Report considers the existing sustainability baseline in Bradford and the key sustainability issues in the District. Every proposal in the Local Plan, and all reasonable alternatives, will be assessed against every objective of this Framework to identify their likely impacts on sustainability in relation to the likely evolution of the baseline in the absence of the plan. The SA Framework is set out in Table 2-1.

Based on the baseline data and key issues and opportunities for the Plan area, an SA Framework was prepared. The SA Framework is comprised of 19 SA Objectives, each of which relates to particular key sustainability issues in the District. It is considered that by seeking to ensure that options considered in the Draft Local Plan contribute towards the achievement of these SA Objectives, then the Draft Local Plan would deliver development that is not only sustainable but helps to tackle the specific challenges and opportunities relevant to Bradford.

All options, including preferred options and reasonable alternatives, are assessed for the extent to which they contribute towards achieving each SA Objective. Because each SA Objective is directly related to key sustainability issues in Bradford, which are based on the baseline data of the District and take into consideration topics listed in Schedule 2(6) of the SEA Regulations, this approach enables a consistent, robust and thorough approach to predicting and evaluating the likely sustainability effects of all options and alternatives.

2.1.5 Consultation

Task A5: Consulting on the scope of SA

Outcomes of Tasks A1, A2, A3 and A4 should be consulted on with, as a minimum, the three statutory consultees of Natural England, the Environment Agency, and Historic England.

The Council initially prepared the SA Scoping Report in 2018 and consulted on it with stakeholders between 11 January and 22 February 2019. The responses received from the stakeholders, and the changes that were subsequently made to the SA Scoping report as a result, are presented in Appendix C. This includes some minor changes that were made to the SA Framework. Following consultation on the Scoping report, the Council commissioned Arcadis to provide SA services to assist with the preparation of the Local Plan documents. The first stage of this was a detailed review of the SA Scoping report. Arcadis made some minor revisions to the scoping report, including some revisions to the SA Framework. This revised scoping report was re-consulted on with the statutory consultees (Natural England, Environment Agency, and Historic England) between January and February 2019. In April 2019, the Scoping Report was finalised in light of the responses received. Following this, the final version of the SA Scoping report is presented in **Table 2-1**.

Table 2.1: SA Framework

SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
1	To ensure the prudent and efficient use of energy including the promotion of renewable and low carbon energy	Energy consumption in the District Renewable energy generation capacity in the District Renewable energy consumption in the District Energy efficiency levels in new buildings Levels of GHG emissions in the Authority area Proportion of new developments meeting Excellent BREEAM standard or exceeding this Megawatts (MW) of installed renewable and low carbon energy capacity within the District	Climatic Factors; Material Assets
2	To minimise waste and increase the amount of waste which is re-used, recycled and recovered	Use of secondary and recycled aggregates Production of primary aggregates (crushed rock; sand & gravel) and other minerals (clay) Proportion of residential waste sent to landfill Percentage of household waste sent for reuse, recycling or composting Proportion of municipal waste sent to landfill	Water; Soil; Air; Climatic Factors
3	To make efficient use of existing land and buildings	% and number of permissions for all development granted on previously developed land. Number of planning applications permitted on best and most versatile agricultural land Number of developments remediating contaminated land	Population; Human Health; Material Assets
4	To reduce and manage the impacts of climate change on the District and vulnerability to its effects	Number and type of flooding incident Number of residential units granted planning permission contrary to EA objection Number of applications granted contrary to Lead Local Authority advice on surface flooding % of development in zone 3 of the flood plain % of developments with Sustainable Urban Drainage (SUDs) Proportion of new development incorporating green infrastructure elements including green roofs and planting, that is beneficial to surface water flood risk Upland tree canopy in the District	Water; Soil; Air; Climatic Factors
5	To safeguard and improve water resources	Number of applications granted contrary to Environment Agency advice on water quality Proportion of homes meeting national standards for water efficiency and optional standards (where viable) set out in the Local Plan as well as proportion of homes exceeding these standards Ecological and chemical status of surface waters as determined by the EA in line with Water Framework Directive requirements	Biodiversity; Flora; Fauna; Soil; Water; Air; Climatic Factors; Human Health
6	To conserve and enhance geodiversity and biodiversity, including the internationally, nationally and locally valued wildlife	Quantity and proportion of new development within Zones of Influence of North and South Pennine Moors SACs and SPAs Area designated for nature conservation importance, including Ancient Woodland, lost to development Number of sites identified of local nature conservation importance, and proportion of local sites where positive conservation has been or is being implemented	Biodiversity; Flora; Fauna; Soil

SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
	species and habitats	<p>Number of species relevant to the District which have achieved BAP or are otherwise protected</p> <p>Prevalence of protected species in the District over the Plan-period</p> <p>Provision of green infrastructure in new developments</p> <p>Ecological connectivity in Bradford</p>	
7	To maintain, protect and enhance the character of the area’s natural and man-made landscapes and townscapes	<p>Area designated for nature conservation importance</p> <p>Number of sites identified of local nature conservation importance, and proportion of local sites where positive conservation has been or is being implemented</p> <p>Proportion of development built in the countryside</p> <p>Number, or % or area of historic buildings (including Listed Buildings, World Heritage Sites, Scheduled Monuments, locally listed buildings), archaeological sites and areas and their settings (both designated and non-designated) damaged</p> <p>Number and % of Listed Buildings considered to be “at Risk”</p> <p>Quantity of vacant and/or derelict land and properties</p>	Biodiversity; Flora; Fauna; Landscape; Cultural Heritage
8	To conserve and, where appropriate, enhance the significance of heritage assets and their setting	<p>Number and % of Conservation Areas with an up to date character appraisal and a published Management Plan</p> <p>Number and % of Listed Buildings considered to be “at Risk”</p> <p>Number of buildings of historic or architectural interest brought back into active use</p> <p>Number, or % or area of historic buildings (including Listed Buildings, World Heritage Sites, Scheduled Monuments, locally listed buildings), archaeological sites and areas and their settings (both designated and non-designated) damaged</p> <p>Number and percentage of Listed Buildings in the Saltaire World Heritage Site considered to be “at Risk”</p> <p>Condition of key views to/from Saltaire World Heritage site</p>	Cultural Heritage
9	To safeguard and improve air quality	<p>Population living within Air Quality Management Areas</p> <p>Number of Air Quality Management Areas</p> <p>% of mortality attributable to particulate air pollution</p> <p>Proportion of population living within 400m of a bus stop and within 2km of a Railway Station</p> <p>Uptake of walking, cycling and public transport modes for travelling to work</p>	Air; Human Health
10	To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts and reduces	<p>Proportion of people travelling to work or school by public transport, walking and cycling</p> <p>Proportion of people living within 2km of work or school that use the private car as a mode of transport</p> <p>Traffic volumes</p> <p>Proportion of population living within 400m of a bus stop and within 2km of a Railway Station</p> <p>Traffic volumes</p>	Population; Human Health; Air; Material Assets

SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
	congestion, pollution and carbon emissions by increasing transport choice and reducing the need to travel by lorry/private car	Accessibility of new housing, employment and retail schemes by public transport. Access to bus and rail services Proportion of new development meeting accessibility standards Number of implemented Travels Plan	
11	To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	Levels of population growth and population structural changes Percentage of homes with one room too few in relation to household size Percentage of households classed as severely overcrowded with at least two rooms two few Number of households on the household register Number of people accepted as homeless (annually) House prices and housing affordability (house price to income ratios) Net housing completions Net affordable housing completions Housing Mix (new housing types and tenure) Housing land supply Net additional Pitches for Gypsies and Travellers Number and location of vacant or empty properties Number of new dwellings meeting accessible housing standards Number of new dwellings meeting nationally described space standards	Population; Material Assets
12	To improve the quality and range of services available within communities and connections to wider social, environmental and economic networks	Proportion of the District population who are overweight or obese Life expectancy at birth Healthy Life Expectancy Number of new or improved healthcare facilities delivered annually through development Number of new sports pitches or other leisure facilities delivered annually through development Income levels (Gross Weekly Pay) Employment rate Unemployment rate	Population; Human Health; Material Assets
13	To promote social cohesion, encourage participation and improve the quality of life in deprived neighbourhoods	Proportion of the District population who are overweight or obese Accessibility of new housing, employment and retail schemes by public transport Number of new or improved healthcare facilities delivered annually through development Number of new sports pitches or other leisure facilities delivered annually through development Levels of deprivation across the district Provision of green infrastructure, open space and recreational facilities within new development Proportion of new development not within or adjacent to existing communities	Population; Human Health; Material Assets

SA Objective		Potential Indicator(s)	SEA Annex 1(f) Topic
14	To create good cultural, leisure and recreation activities available to all	<p>More visitors to the District and greater spend</p> <p>Proportion of the District population undertaking regular physical activity</p> <p>Proportion of the District population visiting cultural facilities/participating in cultural activities</p> <p>Number of new sports pitches or other leisure facilities delivered annually through development</p> <p>Provision of green infrastructure, open space and recreational facilities within new development</p>	Population; Human Health; Material Assets
15	To improve safety and security for people and property	<p>Crime rates per 1,000 head of population</p> <p>Proportion of local people who feel safe in their community</p> <p>Number of road traffic accident (KSI)</p>	Population; Human Health; Material Assets
16	To provide the conditions and services to improve physical and mental health and well-being and reduce inequality to access to health and social care	<p>Proportion of the District population who are overweight or obese</p> <p>Life expectancy at birth</p> <p>Healthy Life Expectancy</p> <p>Number of new or improved healthcare facilities delivered annually through development</p> <p>Access to services and facilities</p> <p>Fraction of mortality attributable to particulate air pollution.</p> <p>% of people with limiting long term illness</p>	Population; Human Health; Material Assets
17	To promote education and training opportunities which build the skills and capacity of the population	<p>Proportion of working age population with no or lower level qualifications</p> <p>% of working age population with NVQ Level 4 and above</p> <p>% of 16-year olds achieving 5+ GCSEs at grades A* to C (including maths, English and NOVQ attainment)</p> <p>Number of new homes more than 1km from a primary school and more than 2km from a secondary school</p> <p>Education infrastructure capacity</p> <p>Level of education infrastructure delivered through development</p>	Population; Human Health; Material Assets
18	To increase the number of high-quality job opportunities suited to the needs of the local workforce	<p>Proportion of working age population with no or lower level qualifications.</p> <p>% of working age population with NVQ Level 4 and above</p> <p>Proportion of working age population employed in each of the Soc 2010 Major Groups</p> <p>Number of jobs created, assessed against employment requirements and targets</p> <p>Number of jobs by employment sector</p> <p>Income level (Gross Weekly Pay)</p>	Population; Human Health; Material Assets
19	To support investment and enterprise that respects the needs of a local area	<p>Levels of economic growth (Gross Value Added)</p> <p>Employment rate</p> <p>Number of jobs created, assessed against employment requirements and targets</p> <p>Number of jobs by employment sector</p> <p>Vacancy rates in employment locations</p>	Population; Human Health; Material Assets

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SA Objective	Potential Indicator(s)	SEA Annex 1(f) Topic
	Number of business start-ups and survivals Location of new business growth and development Increased levels of investment Increased levels of spend Enhanced retail facilities More visitors to the District and greater spend	

3 Stage B: Developing Alternatives and Assessing Effects Rationale

3.1 Statutory requirements and best practice for Stage B

During Stage B of SA, options being considered in the Local Plan are appraised using the SA Framework in order to predict and evaluate their likely sustainability impacts. Appraisal results are shared and discussed with the Council, along with recommendations for avoiding, mitigating or enhancing effects, through an iterative process in order to ensure that environmental and sustainability considerations are factored into their decision-making process from the onset.

The statutory requirements for Stage B, which includes Tasks B1 – B6, are as follows:

Task B1: Testing the plan objectives against the SA Objectives

The Objectives of the Plan should be tested for their compatibility with, and their likely effects on, each SA Objective and identifying other options or opportunities to refine options.



Task B2: Developing the Options

Task B2 involves identifying and considering various options that would help to contribute towards the SA Objectives. This can be seen as being the identification and consideration of preferred options, and alternatives to these options, in the Plan. In light of the likely effects of each option, as identified and described through the iterative SA process, the Council is equipped to refine and select options for the Plan so as to achieve sustainable development.



Tasks B3 & B4: Predicting and evaluating the effects of the Plan

Tasks B3 and B4 of the SA process involve helping to develop the Plan by predicting and evaluating its effects on the economic, environmental and social sustainability of the Plan-area. Government guidance states that the potential effects should to be quantified or a judgment made where this is not possible. Sustainability effects are predicted, with a focus on their likelihood, scale, duration, timing and whether they are positive or adverse. These predications are then evaluated using professional judgement in order to identify cumulative, synergistic and secondary effects as well as conflicts and limitations of Plan policies.



Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects

Mitigation involves putting in place measures to prevent, reduce or offset any identified adverse sustainability effects. Mitigation measures may also include recommendations for enhancing positive effects. The first priority should, however, be avoidance of adverse effects. Only when all alternatives that might avoid an adverse effect have been exhausted, should mitigation be sought to reduce the harmful effect.



Task B6: Proposing measures to monitor the significant effects of implementing the Plan

A monitoring system should be prepared and proposed that, if adopted and followed, would enable the LPA to ensure that the Plan is resulting in the predicted effects and that avoidance, mitigation or compensation measures that were adopted are working as planned. This provides the opportunity to alter measures to make them more effective.

3.2 B1: Testing Local Plan Objectives against the SA Objectives

Stage B.1 involves testing the compatibility of the vision and objectives of the Local Plan with the SA Objectives in order to identify where potential conflicts could arise. Compatibility was determined by assessing the extent to which the Local Plan Objective accords with the SA Objective. Each SA Objective has clearly defined indicators. The compatibility check identifies whether the strategic objectives in the Local

Plan would be likely to make a positive contribution towards achieving the SA Objective or, if by adopting that strategic objective, it may make it more difficult to achieve the SA Objective. This can be a somewhat evaluative and holistic judgement based on experience and best practice and carried out at a strategic and high level. This is presented in Chapter 4 of this Interim SA Report (**Table 4.1**).

3.3 B2: Developing the Options

Developing options for the Local Plan involves the identification and consideration of preferred options and alternatives to these options. In light of the likely effects of each option, as identified and described through the iterative SA process, the Council is equipped to refine and select options for the Plan so as to achieve sustainable development.

3.3.1 Reasonable alternatives

Statutory requirements for considering reasonable alternatives stem from Schedule 1 of the SEA Regulations, as set out below.

SEA Directive Article 5:

12.(1) *Where an environmental assessment is required by any provision of Part 2, the responsible authority must prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.*

(2) *The report must identify, describe and evaluate the likely significant effects on the environment of—*

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

In practice, the requirements from the SEA Regulations necessitate the following for the SA of the Local Plan:

- The SA should identify the reasonable alternatives for proposals in the Local Plan and predict and evaluate their likely environmental and sustainability impacts to the same level of detail as all options being appraised – the idea being that decisions made during the preparation of the Local Plan are evidence led and informed by what the most sustainable options are;
- The SA should outline the reasons for which reasonable alternatives were considered to be ‘reasonable’ whilst other options were not; and
- The SA should justify the selection of the preferred approach in light of the alternatives dealt with.

The purpose of using reasonable alternatives is to show that evidence has generated the proposed Plan rather than vice-versa.

3.3.2 Guidance and Relevant Case Law

SEA Guidance from the Office of the Deputy Prime Minister (2005)¹² states that “*only reasonable, realistic and relevant alternatives need to be put forward*”.

The SEA Regulations do not define what constitutes a reasonable alternative, or how many alternatives must be considered. Should an option be considered to be clearly so unreasonable that no reasonable person acting reasonably could have made it, then it is considered that it would not constitute a ‘reasonable alternative’. Ultimately, the determination as to whether an option is reasonable or not is typically an evaluative and qualitative assessment for the planning authority.

¹² Office of the Deputy Prime Minister, Practical Guide to the Strategic Environment Assessment Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Accessed: 27/01/21]

In ‘R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] Env LR 1’, Hickinbottom J summarised the law relating to reasonable alternatives:

“iv) “Reasonable alternatives” does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.

v) Article 5(1) refers to “reasonable alternatives taking into account the objectives... of the plan or programme...” (emphasis added). “Reasonableness” in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. An option which will, or sensibly may, achieve the objectives is a “reasonable alternative”. The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no “reasonable alternatives” to it.

vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”

The finding that it is the plan-making authority which is the primary decision-maker in relation to identifying what is to be regarded as a reasonable alternative is further backed up by cases including ‘Shadwell Estates Ltd v Breckland DC [2013] EWHC 12’ and ‘Heard v. Broadland DC [2012] Env. L.R. 23’.

In ‘Save Historic Newmarket Ltd v. Forest Heath District Council [2011] J.P.L. 1233’, Collins J found that:

- For there to be compliance with Article 5 of the SEA Directive, the public must be presented with an accurate picture of what reasonable alternatives there were to the proposed policies and why they were not considered to be the best option;
- Equally, the environmental report and the draft plan must operate together, so that consultees can consider each in the light of the other; and
- In an iterative plan-making process, it is not inconsistent with the SEA Directive for alternatives to the proposed policies to be ruled out prior to the publication of the final draft plan, but if that does happen the environmental report accompanying the draft plan must refer to, summarise or repeat the reasons that were given for rejecting the alternatives at the time when they were ruled out and those reasons must still be valid.

In ‘Heard v. Broadland DC [2012] Env. L.R. 23’, Ouseley J considered the various SAs to be deficient because, inter alia:

- Assessments of alternatives wasn’t done on the same basis as the preferred option;
- There was no explanation of the alternatives selected;
- There was no cross-reference to any other document where the identification and equivalent assessment of alternatives could be found;
- There was no explanation of the reasons for selecting the alternatives dealt with and without such reasons it was difficult to see whether or not the choice of alternatives was deficient;
- An outline of the reasons for the selection of the preferred option (which, even though not an express requirement of the Directive, is a purposive interpretation of the SEA Directive) was also missing.

3.3.3 How the Requirements Have Been Met

Table 3.1 sets out the requirements for the SA with regards to reasonable alternatives, as per the Directive, Regulations, case law and guidance (as described above), and how these have been met.

It is important to note that the Local Plan is at a draft stage. The preferred options for policies, Strategic Urban Extensions (SUEs) and site allocations could therefore change as the Plan-making progresses and new evidence comes to light. It is expected that the final preferred approach will only be known once the

Local Plan has been finalised. The SA will be amended and updated accordingly in order to reflect the latest preferred approach.

Table 3.1: Reasonable alternative requirements and where these have been met

Requirement	Where this has been met
The SA should identify the reasonable alternatives for proposals in the Bradford Local Plan.	The Council has considered reasonable alternatives for policies, SUEs and site options. These are identified in Appendices D, E and F of this report.
The SA should outline the reasons for which reasonable alternatives were considered to be 'reasonable' whilst other options were not.	As per guidance and relevant case law, the determination of what options are reasonable alternatives or not is within the decision-making authority of the Council. Reasonable Alternatives to the plan policies and sites have been developed throughout this process and determined by the Council. These are explained within Chapter 5 of this Report.
The SA should predict and evaluate their likely environmental and sustainability impacts to the same level of detail as all options being appraised, with effects identified, described, and evaluated in a comparable way.	All reasonable alternatives have been assessed using the same methodology and to the same level of detail, with effects identified, described, and evaluated in a comparable way. The results of this process are summarised in sections 5.2, 6.2 and 7.2 of this report and presented in full in Appendices D, E and F.
The SA should provide an outline of the reasons for the selection of the preferred approach in light of the alternatives dealt with.	At this stage, the Plan is a draft version and so the final preferred approach has not been arrived at. The justification for the preferred approach in light of the alternatives dealt with will therefore be updated and refined as the preferred approach is increasingly finalised.

3.4 B3 & B4: Predicting and Evaluating Effects

Tasks B3 and B4 of the SA process involve helping to develop the Plan by predicting and evaluating the effects of options (individually and cumulatively) on the economic, environmental and social sustainability of the Plan-area. Government guidance states that the potential effects should be quantified, or a judgment made, where this is not possible.

The prediction and evaluation of the effects of options in the Local Plan relies heavily on the SA Framework – every option is appraised for its likely impacts on every SA Objective. The SA Framework provides indicators for each SA Objective that help to guide the decision-making over whether options would make a negative or positive contribution towards each SA Objective.

In line with requirements of the SEA Regulations, the following characteristics of effects are predicted and evaluated:

- Probability;
- Duration, including short-, medium- and long-term effects;
- Frequency;
- Reversibility;
- Cumulative and synergistic nature;
- Transboundary nature;
- Secondary nature;
- Permanent or temporary nature; and
- Positive or negative nature.

A key principle of sustainability assessments is a precautionary approach wherein at times of uncertainty or where evidence is lacking the worst-case scenario is assumed. The prediction and evaluation of significant

effects in SA therefore typically assumes the worst-case scenario. However, it is accepted that such scenarios arising are in reality unlikely, particularly as the comprehensive array of policies proposed in the Local Plan would help to avoid or mitigate negative impacts.

Table 3-2 provides the rationale behind the approach taken towards predicting and evaluating the above characteristics.

Table 3-2: Rationale for appraisal methodology

Characteristic	Rationale
Format	<p>The assessment text is intended to be comprehensive, robust and to satisfy the technical requirements of SA and SEA whilst also being accessible for the general public and avoiding unwieldy and excessively long tables or appendices. For this purpose, the writing style of assessment text adopts a slightly shorthand approach.</p> <p>An assessment is provided for every option against every SA Objective. For all options, the effects identified during the assessment are evaluated for their probability, geographical extent, reversibility, permanence, magnitude, and significance.</p> <p><u>Policies</u></p> <p>Each policy option has been assessed, with the results presented in Appendix D.</p> <p>The policy appraisals are presented in tables. Where appropriate, options and policies are grouped together in the same assessment table. The rationale for this is as follows:</p> <ul style="list-style-type: none"> • Policies are grouped together in the Local Plan; • Policies under the same theme in the Plan, such as ‘Transport’ policies, are likely to result in similar effects on a number of indicators. Grouping the appraisals together facilitates less repetition of text, saving space and reducing the need for a paperchase for readers; • Grouping appraisals together facilitates a more holistic appreciation of the likely cumulative effects of the Plan and the overall impact of all policies in-combination. Policies in the Plan are not going to be adopted in isolation; and • Grouping policies and options together facilitates a comparison of the likely impacts of options vs their reasonable alternatives. <p>The assessment text for SA Objectives 9 and 10, on air quality and transport, and the assessment text for SA Objectives 11, 12 and 13 on accessibility of services, community cohesion and culture/recreation, have been grouped together. This is because the indicators used in the assessment for these SA Objectives are largely similar and grouping them together in this way saves space and avoids unnecessary repetition. Whilst the summary of effects text is grouped together, separate scores and characteristics of effects are provided for all SA Objectives.</p> <p>The following symbol is used during the policy appraisal text: ‘→’. This is predominantly intended to mean ‘would lead to’.</p> <p>For example, an impact of a policy on GHG emissions might usually read:</p> <p><i>“Policy P1 would be likely to enhance public transport options for people in Bradford. This would be likely to lead to a reduction in GHG emissions from the transport sector.”</i></p> <p>For such an impact, the shorthand style of assessment text would read:</p> <p><i>“P1 → enhanced public transport → reduction in GHG emissions from transport”.</i></p> <p><u>SUEs</u></p> <p>Each SUE option has been assessed, with the results presented in Appendix E.</p> <p><u>Sites</u></p> <p>Each site option has been assessed, with the results presented in Appendix F.</p>
Probability	<p>There is an inherent degree of uncertainty in appraisals carried out in SA. Should it be adopted, the Local Plan would likely be in force for several years, over which time could potentially arise</p>

Characteristic	Rationale
	<p>unforeseen circumstances as baseline data unexpectedly changes.</p> <p>For example, any given community facility in Bradford could potentially close down or move within a period of months, and thus an assessment which considers that a Local Plan policy or site would provide new residents with good access to this facility pre-development, may not do so by the time construction begins. These circumstances are impossible to predict. The planning system is generally robust enough to deal with such changes by re-assessing the needs of sites and communities at the time applications are made.</p> <p>Uncertainties are dealt with in SA by adopting a precautionary approach, wherein the worst-case scenario is assumed unless reliable evidence suggests otherwise. This is to ensure that any potentially significant negative effects are identified and acted upon. Whilst the worst-case scenario is identified, it should be noted that it could be highly unlikely to arise in reality.</p> <p>Assessment tables include a column indicating whether there is considered to be a Low, Medium or High probability of the effect taking place. Where the recorded effect is 'uncertain', the probability is recorded as 'Low'. Where the recorded effect is 'neutral/negligible', the probability is recorded as 'High'. This is because a precautionary approach is adopted and, as such, unless there is a high probability of the effect being neutral/negligible then the worst-case scenario is assumed. Probability is an evaluative judgment of the SEA/SA experts carrying out the appraisals.</p>
<p>Duration and short-, medium- and long-term effects</p>	<p>Assessment tables include a column indicating whether the effects are considered to be Short-, Medium- or Long-term.</p> <ul style="list-style-type: none"> • Short-term effects reside for 0-10 years after Plan adoption; • Medium-term effects reside for 10-20 years after Plan adoption; and • Long-term effects last beyond the Plan period. <p>Effects can be multiple terms, such as arising in the short-term and residing in the long-term. In the assessment tables, the longest term is used to indicate the duration i.e. the assessment indicates the duration of the effect but not necessarily when it will initially arise.</p>
<p>Reversibility</p>	<p>Assessment tables include a column indicating whether effects are considered to be reversible or irreversible:</p> <ul style="list-style-type: none"> • R = Reversible; and • IR = Irreversible. <p>The intention is not to suggest whether or not the effect is going to be intentionally reversed, but rather to indicate if it is theoretically possible that the effect could be reversed.</p>
<p>Permanent and temporary</p>	<p>The assessment tables include a column to indicate whether the identified effects are considered to be permanent or temporary:</p> <ul style="list-style-type: none"> • T = temporary; and • P = permanent. <p>Should the Plan be adopted, it would only be in place for the Plan period and would subsequently be replaced by a new Plan. Many of the effects of policies in the proposed Plan are therefore typically temporary effects. Nevertheless, a number of the effects of new development on a greenfield site would be likely to be permanent.</p>
<p>Positive & negative effects and significance</p>	<p>The assessments evaluate whether effects are likely to be positive, negative, or neutral. The range of predicted effects includes:</p> <ul style="list-style-type: none"> • Major positive - The proposal significantly contributes to the achievement of the SA Objective; • Minor positive - The option contributes partially to the achievement of the SA Objective; • Uncertain – It is not possible to determine the nature of the impact;

Characteristic	Rationale														
	<ul style="list-style-type: none"> • Neutral - Relationship between the option and the SA Objective is negligible; • Positive/negative – A combination of positive and negative contributions to the SA Objective; • Minor negative - The option partially detracts from the achievement of the SA Objective; • Major negative effects - The proposal significantly detracts from the achievement of the SA Objective. <p>For the purpose of the SEA Regulations, effects noted as ‘major adverse’ or ‘major positive’ are considered to be ‘significant’. The SEA Regulations necessitate a focus on ‘significant’ effects. Determining whether an effect is significant or minor is an evaluative judgment based on expert opinion, best practice and industry standards. It is also guided by Annex II (2) of the SEA Directive, which states:</p> <ul style="list-style-type: none"> • <i>“The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</i> • <i>The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;</i> • <i>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,</i> • <i>Environmental problems relevant to the plan or programme; and</i> • <i>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).”</i> <p>Minor effects (i.e. insignificant effects) are also identified. This is because identifying minor effects assists with the identification of cumulative and synergistic effects (e.g. several minor effects combined to have a significant effect), can help to identify opportunities for enhancements (e.g. enhancing a minor positive effects to make it significant) and also better enables the Council to make a more informed decision over the sustainability performance of options.</p> <p>A positive effect would typically be one where the Plan proposal would be likely to contribute towards the aims of the SA Objective, whereas an adverse effect would be one where the Plan proposal conflicts with the Objective. Typically, if a proposal would be expected to have a positive effect(s) to the same extent that it would have an adverse effect(s), a +/- score is awarded. However, if it is considered to be likely that the adverse effect(s) would be of a notably greater magnitude than the positive effect(s), then an adverse score is awarded in-line with the precautionary principle.</p> <p>Assessments carried out in SEA operate at a very high level and so the results for options and alternatives that are only slightly different to one another can appear very similar. It might be that one option would have an effect that is of a slightly greater magnitude than the effect of another option, but the effects of both options are both significant and so they would both receive the same score.</p> <p>The assessment tables include a column that displays an overall score for each policy against each SA Objective that indicates the overall effect, as follows:</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th>Major negative</th> <th>Minor negative</th> <th>Neutral / negligible</th> <th>Positive & negative</th> <th>Uncertain</th> <th>Minor positive</th> <th>Major positive</th> </tr> </thead> <tbody> <tr> <td style="background-color: red;">--</td> <td style="background-color: pink;">-</td> <td style="background-color: lightgrey;">0</td> <td style="background-color: darkblue;">+/-</td> <td style="background-color: lightgrey;">?</td> <td style="background-color: lightgreen;">+</td> <td style="background-color: green;">++</td> </tr> </tbody> </table>	Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive	--	-	0	+/-	?	+	++
Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive									
--	-	0	+/-	?	+	++									
Frequency	All effects of the Plan are considered to occur once, unless indicated otherwise.														
Cumulative nature and synergistic	This SA provides an appraisal of all options in the Plan. These policies; SUEs; and sites are not going to be adopted in isolation and so it is important to identify and evaluate the cumulative														

Characteristic	Rationale		
effects	<p>impacts of all option in-combination. A cumulative effects appraisal has also been carried out for this purpose. Cumulative and synergistic effects are defined as follows:</p> <ul style="list-style-type: none"> • Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect; and • Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts. <p>The cumulative effects assessment in this report accounts for both cumulative and synergistic effects.</p>		
Transboundary nature	<p>The geographical extent of effects is predominantly Bradford District. However, where effects would be likely to be discernible in neighbouring authorities or at a scale greater than Bradford, this is specified.</p>		
Secondary effects	<p>The assessment process inherently includes a consideration of secondary effects. The assessment text avoids specifically signposting whether the identified effect is primary or secondary.</p> <p>Secondary effects are defined as <i>“effects that are not a direct result but occur away from the original effect or as a result of a complex pathway”</i>.</p>		
Accessibility Standards	<p>For several SA Objectives, the site assessment is focussed on the accessibility of certain services and facilities. For example, new residential development at a site option should provide the new residents with good access to public transport options, shops, cultural spaces, outdoor open space, semi-natural habitats, and employment opportunities. Based on a combination of the Bradford Core Strategy Accessibility Standards, expert opinion, and best practice (e.g. Shaping Neighbourhoods: For Local Health and Global Sustainability, Barton, Grant & Guise, 2010), the following distances are applied as the target distances for each key service/facility:</p> <ul style="list-style-type: none"> • Primary/ middle school: 800m • Secondary School: 1,200m • GP Surgery: 800m • Local Shop: 500m • Community Centre: 800m • Local Centre: 1,000m • District Centre/Superstore: 1,900m • Leisure Centre: 1,900m • Bus stop: 400m • Train station: 800m <p>Distances in the SA/SEA are measured ‘as the crow flies’ and, in line with the precautionary approach, are measured from the point of the site that is the furthest away from the service/facility. At the high and strategic level SEA/SA assessments operate at, and at this stage of planning where precise details on the layout of development at unknown, it is not feasible to accurately measure distances based on the travel routes that site users would take.</p>		
Baseline trends	<p>As part of the policy assessments, for each SA Objective, an analysis of the baseline data gathered during the SA Scoping has been carried out to determine the likely future baseline trends. This indicates whether the baseline is currently improving, declining or static with regards to moving towards the SA Objectives as per the following key.</p>		
	Declining	Static	Improving

Characteristic	Rationale
Recommendations	<p>Alongside the assessment results recommendations are made. These are measures which, if adopted, would be likely to help avoid or minimise negative impacts or to enhance positive impacts. The SA seeks to make recommendations in all cases where negative impacts have been identified – where this is not feasible it is explained in the assessment boxes.</p> <p>Effect scores recorded for each site do not take into account these recommendations. The effects adopt a precautionary approach, assuming the worst-case scenario where appropriate. Should recommendations be adopted, it is expected that positive effects would be maximised, and negative effects would be avoided or minimised.</p> <p>It is considered that policies not under review are unlikely to be able to incorporate recommendations and as such recommendations have only been made for policies that are under review.</p>

3.4.1 Site Assessment Methodology

Table 3-3 sets out how the sites have been assessed in the SA process. The methodology is presented per SA Objective. The Objectives presented in blue were rationalised in the assessment, in that it was considered, for the sites in question, the appraisal results would not be affected spatially, but on the basis of scale. Therefore, these were assessed without the use of the GIS database.

Table 3-3: Site assessment methodology

1. To ensure the prudent and efficient use of energy including the promotion of renewable and low carbon energy		
Impacts on this Objective are typically expected to		
How would the energy consumption of proposed development compare with the site's existing use?	Significant decrease in energy consumption e.g. reduction of 500+ homes	++
	Insignificant decrease e.g. reduction of <500 homes	+
	Insignificant increase e.g. of <500 homes	-
	Significant increase in energy consumption e.g. increase of 500+ homes	--
How would the site impact on renewable energy generation?	Development would generate renewable energy	++
	Development would provide opportunities for renewable energy generation e.g. south-facing roofs	+
	Development would remove opportunities for renewable energy generation	-
	Development would remove renewable energy generating technology	--
2.		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term, be practically irreversible and likely permanent. This is because any waste sent to landfill is unlikely to be reclaimed and reused or recycled.		
How would waste arisings from proposed development compare with the site's existing use?	Significant decrease e.g. reduction of 500+ homes or 15ha+ employment	++
	Insignificant decrease e.g. reduction of <500 homes or <15ha	+
	Insignificant increase e.g. increase of <500 homes or <15ha	-
	Significant increase e.g. increase of 500+ homes or 15ha+ employment	--

How would the site impact rate of reduce/reuse/recycle?	Development would provide new recycling facilities	++
	Development encourages sustainable management of waste and materials	+
	Development discourages sustainable management of waste and materials	-
	Development would result in the loss of recycling facilities	--
3. To make efficient use of existing land and buildings		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term, be practically irreversible and likely permanent. This is because any greenfield land or soils lost to development are unlikely to undergo major efforts to be restored as greenfield land.		
How much greenfield land would be lost?	Site is 100% brownfield (0ha of greenfield land lost)	++
	Site is 50%+ brownfield	+
	Site is <50% brownfield and/or would result in loss of 0-0.4ha greenfield land	-
	Site is <50% brownfield and/or would result in loss of >0.4ha greenfield land SUE sites of 500+ dwellings	--
What is the agricultural land classification of any soils impacted by the development?	Urban	++
	5, 4, 3b	+
	1, 2, 3a	--
Would the development re-use existing buildings?	Yes, for all of the development	++
	Yes, for some of the development	+
	All existing buildings would be demolished but waste arisings would be reused	-
	All existing buildings would be demolished and waste arisings would not be used	--
4. To reduce and manage the impacts of climate change on the District and vulnerability to its effects		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term, be practically irreversible and likely permanent. This is because new development, such as new homes, is typically expected to last a long-time beyond the Plan period, potentially hundreds of years, over which time any local risk of flooding is likely to increase.		
How would it impact people's exposure to fluvial and surface water flood risk?	FZ1 and low SWFR plus incorporation of GI in development	++
	FZ1 and low SWFR	+
	FZ2 and medium SWFR	-
	FZ3a, 3b or highest SWFR	--
Would the development incorporate SuDS?	Yes and SuDS would be nature based that contribute to cooler microclimates	++
	Yes	+
	No	-

	Development with SuDs would be replaced with development without SuDS	--
How would it impact on the local tree canopy (climate cooling)?	Increase in canopy	+
	Decrease in canopy	-
Would the development replace upslope vegetation with hard standing?	Brownfield site	+
	Development would result in loss of greenfield site downslope	-
	Development would result in loss of upslope greenfield site and vegetation	--
5. To safeguard and improve water resources		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term, be technically reversible but likely permanent. This is because impacts on water quality are expected to last until efforts are made to reverse them. It is expected that in line with the Water Framework Directive water quality in the Plan-area would improve over time following concerted efforts to achieve this.		
Is the site within a groundwater source protection zone?	Zone 3 or 4	+
	Zone 2	-
	Inner Zone (1)	--
How would water consumption of proposed development compare with the site's existing use?	Significant decrease in consumption e.g. decrease of 500+ homes or 15ha+	++
	Decrease of <500 homes or <15ha	+
	Increase of <500 homes or <15ha	-
	Significant increase in consumption e.g. increase of 500+ homes or 15ha+	--
Are there any nearby natural waterbodies that could be impacted by the development?	Development would provide a new semi-natural waterbody	++
	No waterbody(s) within 100m of the Site	+
	Waterbody(s) within 100m of the Site, or an unnamed waterbody(s) is within the Site	-
	A named waterbody(s) within the Site boundary	--
6. To conserve and enhance geodiversity and biodiversity, including the internationally, nationally and locally valued wildlife species and habitats		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term, be technically reversible but potentially permanent. Adverse impacts on biodiversity, such as lost supporting habitat caused by new development, are unlikely to be rectified naturally and would require concerted and long-term efforts.		
Would the development contribute towards a local net gain in GI cover?	Significant enhancements to GI	++
	Minor enhancements to GI	+
	Minor loss of GI	-
	Significant loss of GI	--
Would the development impact on a biodiversity designation?	Positive impact on international or national designation e.g. SAC, SPA, SSSI	++
	Positive impact on regional or local designation e.g. LWS	+

	Adverse impact on regional or local designation e.g. LWS	-
	Adverse impact on international or national designation e.g. SAC, SPA, SSSI	--
Would the development impact on hedgerow, total tree canopy and/or TPO trees?	Development would preserve and enhance all hedgerows and trees	++
	Development would preserve and enhance most of the hedgerows and trees	+
	Development would fail to preserve or enhance most of the hedgerows and trees	-
	Development would result in the loss of most of the hedgerows and trees onsite	--
Would the development impact on the coherence and connectivity of the wider ecological network?	Development would connect separate habitats together	++
	Development would enhance the connection value of the site	+
	Development would reduce site's contribution towards connectivity	-
	Development would cut off and isolate habitat	--
Has the HRA predicted an LSE as a result of the development?	Yes	--
7. To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and be reversible.		
How would the development impact on the local landscape or townscape character?	Development would significantly enhance local character e.g. high-quality development in-keeping with surrounding area on derelict brownfield plot	++
	Development would be of a high-quality design in-keeping with surrounding area	+
	Development would be slightly discordant with surrounding area e.g. development on greenfield land viewable at long-distances	-
	Development would significantly alter character e.g. major development on greenfield land in countryside location	--
Would the development impact on any valued landscapes?	Development would preserve and enhance valued landscapes e.g. high-quality design on derelict plots	++
	Development would be in-keeping with character of valued landscapes	+
	Development would discord with character of valued landscapes	-
	Development would significantly discord with character of valued landscapes	--
How would the development impact on the AONB?	Development would protect and enhance the AONB e.g. high-quality design according with AONB Management Plan on derelict brownfield plots	++
	Development would accord with the AONB Management Plan	+
	Development would be viewable from the AONB and could alter the character/quality of these views	-
	Development would be adjacent to or within the AONB and would not conform with the AONB Management Plan	--

How would the development impact tranquillity of the surrounding area?	Development would significantly enhance tranquillity (reduction in noise, air and light pollution) e.g. replacement of industrial uses with open space	++
	Development would slightly enhance tranquillity e.g. minor reduction in intensity of site use	+
	Development would slightly diminish tranquillity e.g. minor increase in intensity of site use	-
	Development would significantly diminish tranquillity (reduction in noise, air and light pollution) e.g. replacement of open space with industrial uses in tranquil area	--
8. To conserve and, where appropriate, enhance the significance of heritage assets and their setting		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be irreversible.		
How would the development impact on designated heritage assets?	Protection and enhancement for assets of significant international or national value e.g. WHSs, SMs, Grade I or Grade II* LBs	++
	Protection and/or enhancement of Grade II LBs e.g. improvements to their setting	+
	Development would fail to preserve or enhance Grade II LBs e.g. alterations to their setting	-
	Development would fail to preserve or enhance WHSs, SMs, Grade I LBs or Grade II* LBs e.g. alterations to their setting	--
How would the proposed development impact Conservation Areas?	Development would significantly help to improve the character and setting of a Conservation Area	++
	Development would make a minor positive contribution towards the character and setting of a Conservation Area	+
	Development would have a minor adverse impact on the character and setting of a Conservation Area	-
	Development would have a major adverse impact on the character and setting of a Conservation Area	--
How would the development impact on belowground archaeology?	Development would provide opportunities for new below-ground investigations for heritage assets	+
	Development is in an area of Archaeological Interest but would be not provide opportunities for investigations	-
9. To safeguard and improve air quality		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be irreversible.		
How would the development impact on AQMAs and/or Clean Air Zones?	The proposed development would make a major contribution towards improving air quality at an AQMA and/or CAZ e.g. the replacement of intense industrial use with open space	++
	The proposed development would make a minor contribution towards improving air quality at an AQMA and/or CAZ e.g. decrease in car movements	+
	Development would make achieving air quality improvement targets at a nearby AQMA and/or CAZ more difficult e.g. increase in car movements	-

	Development is within a CAZ or an AQMA and would worsen air quality.	--
How would the development impact air quality?	The proposed development would make a major contribution towards improving air quality e.g. new public transport options	++
	The proposed development would make a minor contribution towards improving air quality e.g. decrease in car movements	+
	The proposed development would make a minor contribution towards worsening air quality e.g. increase in car movements	-
	The proposed development would make a major contribution towards improving air quality e.g. loss of public transport options	--
10. To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts and reduces congestion, pollution and carbon emissions by increasing transport choice and reducing the need to travel by lorry/ private car		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would the development impact the uptake of public and active modes of transport?	Site users would be within 400m of a bus stop and within 800m of a railway station each with at least one frequent service, and would have good walking and cycling options for accessing the site	++
	Site users would be within 400m of a bus stop, and within 2km of a railway station, OR within 800m of a railway station each with at least one frequent service, and would have good walking and cycling options for accessing the site	+
	Site users would not be within 400m of a bus stop or within 2km of a railway station	-
	Site users would not be within 400m of a bus stop or within 2km of a railway station and would not have good walking or cycling options to access the site	--
How would the development impact on the local capacity of the road network?	The local road network has capacity to accommodate growth associated with the proposed Development or, if not, an appropriate level of new or enhanced infrastructure would be in place prior to development beginning	+
	There are concerns that the local road network would not have the capacity to accommodate growth associated with the proposed Development or that it would result in an increase in congestion	-
How would the development impact digital infrastructure in Bradford?	Development would provide site users with good access to digital infrastructure, thus potentially reducing their need to travel e.g. by accessing services online	+
	Development would worsen the quality or accessibility of local digital infrastructure thus potentially increasing their need to travel	-
11. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How many homes would the development provide?	Development would result in 500+ new homes	++
	Development would result in 0-500 new homes	+
	Development would result in a reduction in housing at the site of <100	-

	Development would result in a reduction in housing at the site of >100	--
How would the mixture of housing contribute towards Bradford's varied and growing housing needs?	Residential development would predominantly be a varied mix, e.g. affordable homes, assisted care etc.	++
	Residential development would partially be a varied mix, e.g. affordable homes, assisted care etc.	+
	Residential development would not provide any affordable housing or assisted care etc.	-
	Residential development would replace affordable housing with non-affordable	--
12. To improve the quality and range of services available within communities and connections to wider social, environmental and economic networks		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How accessible are key services, amenities and facilities for site users?	Development would provide new key services, amenities and or facilities within 600m of a residential area	++
	Areas of key services, amenities and facilities within 600m of the site	+
	Areas of key services, amenities and facilities > 600m from the site	-
	Development would result in the loss of key services, amenities and/or facilities without them being replaced nearby	--
13. To promote social cohesion, encourage participation and improve the quality of life in deprived neighbourhoods		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would the site allocation contribute towards social cohesion and quality of life?	Development would provide high-quality homes within an existing community in an area of high deprivation (IMD) without disrupting cohesiveness of existing community	++
	Development would provide high-quality homes within an existing community or would avoid disrupting the cohesiveness of residential communities	+
	Development would situate new residents away from an existing community, OR would situate new residents in an existing community but the development is of a scale that the cohesiveness of this community could be harmed	-
	Development would result in the loss of housing in a deprived neighbourhood and/or development would several disrupt the cohesiveness of the local community	--
14. To create good cultural, leisure and recreation activities available to all		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would the site allocation contribute towards enhancing the quality, range and accessibility of cultural and leisure facilities?	Development would provide new cultural or leisure spaces within 800m of a residential area	++
	Areas of cultural or leisure spaces within 800m of the site	+
	Areas of cultural or leisure spaces > 800m from the site	-

	Development would result in the loss of cultural or leisure spaces without them being replaced nearby	--
15. To improve safety and security for people and property		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would rates of crime at the site change as a result of the development?	Site allocation would significantly enhance the safety and security of the surrounding area	++
	Development incorporates various measures to enhance the safety and security of site-users	+
	Development could attract higher rates of crime at the site than currently e.g. replacing greenfield sites with new development, OR the development would be unlikely to ensure the safety and security of site users	-
	Development would be a significant attractor of crime at a location of low crime rates	--
16. To provide the conditions and services to improve physical and mental health and wellbeing and reduce inequality to access to health and social care		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would the site allocation impact on the ability of local users and/or site users to pursue physically and mentally healthy lifestyles?	Site is within 6km of a hospital; satisfies ANGSt; 1.2km of exercise opportunities; and 800m of a health centre (4+ doctors).	++
	Site achieves 2 or 3 of the above listed criteria.	+
	Site achieves just 1 of the above listed criteria.	-
	Site achieves 0 of the above listed criteria.	--
17. To promote education and training opportunities which build the skills and capacity of the population		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would the site allocation impact on site users' and local people's access to education opportunities? (residential site allocations only)	Site is within 800m of a primary school and within 1.2km of a secondary school (each of which has capacity for new students from the development OR the site would provide a new school	++
	Site is within 800m of a primary school OR within 1.2km of a secondary school (each of which has capacity for new students from the development	+
	Site is not within 800m of a primary school and within 2km of a secondary school that have capacity for new students from the development	-
	Development would result in the loss of a school	--
How would the site impact on opportunities for skills learning at the site?	Site would provide new employment land that offers skills learning opportunities for local people and employees	+
	Site would result in the loss of employment land and thus the loss of any skills learning opportunities previously available at this location	-
18. To increase the number of high-quality job opportunities suited to the needs of the local workforce		

Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would the site allocation impact on the range, quality and/or accessibility of employment opportunities?	The proposed development would provide new employment opportunities	++
	The proposed development would situate new residents within 5km of major employment areas	+
	The proposed development would situate residents >5km from a major employment area	-
	The proposed development would result in a net loss of employment opportunities at the site	--
19. To support investment and enterprise that respects the needs of a local area.		
Impacts on this Objective are typically considered to arise in the short-term, reside in the long-term and typically be reversible.		
How would the site allocation impact on town and district centres?	The proposed development would provide a significant boost to the vitality and vibrancy of a town or district centre e.g. the provision of significant new retail space	++
	The proposed development would provide a minor boost to the vibrancy or vitality of a district or town centre e.g. through a minor increase in footfall as a result of derelict site being regenerated	+
	The proposed development would lead to a minor diminishment of the vibrancy or vitality of a district or town centre e.g. through a minor decrease in footfall as a result of retail space being demolished	-
	The proposed development would cause significant harm to the vitality and vibrancy of a town or district centre e.g. the demolishing of significant retail space	--
How would the development impact on the range, quality and accessibility of economic enterprises?	The proposed development would deliver 1ha+ of new enterprises that contribute towards the long term success of Bradford's economy	++
	The proposed development would deliver <1ha of new enterprises that contribute towards the long term success of Bradford's economy	+
	The proposed development would result in the loss of <1ha of enterprises that contribute towards the long term success of Bradford's economy	-
	The proposed development would result in the loss of >1ha of enterprises that contribute towards the long term success of Bradford's economy	--
How would the site impact on Bradford's cultural and tourism offering?	The proposed development would provide new culture, leisure or tourist attractions	++
	The proposed development would enhance the accessibility of culture, leisure or tourist attractions or contribute towards their long-term viability e.g. by situating new residents in proximity	+
	The proposed development would reduce the accessibility of culture, leisure or tourist attractions or diminish towards their long-term viability	-
	The proposed development would result in the loss of culture, leisure or tourist attractions	--

3.4.2 Local Plan policies influence

SUE and site options would be required to conform with policies in the Local Plan. In many cases, these policies would be expected to influence the sustainability performance of the sites. Local Plan policies have therefore been reviewed to identify their likely influence on the performance of sites for each SA Objective, the results of which are presented in **Appendix G**. Table 5-6 presents the Local Plan policies that have influenced the assessment. This has been factored into the assessment results in **Appendices E and F**.

3.4.3 Mitigation library

Accompanying the appraisal results are additional mitigation recommendations for the Council's consideration. Similar measures are recommended for different site options for the same SA Objectives. In such cases, in order to minimise repetitive text and to save space, a coding system has been used. The mitigation codes in the appraisal tables in **Appendices E and F** refer to the coded mitigation measures presented in **Table 9-2**.

3.5 B3 & B4: Cumulative and synergistic effects

In addition to predicting and evaluating the effects of sites on an individual basis, an assessment of the likely cumulative effects of all sites in-combination will also be carried out. The full assessment can be found in **Chapter 8**.

3.6 B5: Recommendations

Mitigation involves putting in place measures to prevent, reduce or offset any identified adverse sustainability effects. Measures may also include recommendations for enhancing positive effects. The first priority should, however, be avoidance of adverse effects. Only when all alternatives that might avoid an adverse effect have been exhausted, should mitigation be sought to reduce the harmful effect.

Recommendations are made alongside the appraisal results on an option by option basis. Recommendations are also made alongside the cumulative effects assessment. The recommendations made in this SA are set out in **Chapter 9**.

3.7 B6: Monitoring

A proposed monitoring framework will be set out in the next iteration of the SA Report, to include suggested indicators to monitor the predicted significant effects of the Local Plan.

4 Vision and Objectives

4.1 B1: Vision

The Council's Vision for Bradford, which is unchanged from that in the Adopted Core Strategy, is that 'By 2038 the Bradford District:

Has become a key driver of the Leeds City Region's economy and a much sought after and desirable location where people want to live, do business, shop and spend their leisure and recreation time. The District has demonstrated that it is a place that encourages sustainable lifestyle choices and responds positively to the challenge of climate change.

The growth of the City of Bradford and the towns along Airedale and Wharfedale has been supported by a significant increase in the delivery of new houses, both market and affordable. This growth has driven the economic and social transformation of the District. Sustainable development and management has been at the heart of this growth and prosperity. The District's unique landscapes, heritage and biodiversity assets have played a vital role in making great places that encapsulates what makes Bradford so special.

Economic transformation of the District has been achieved based on Bradford's key strengths of its unique young, growing and international workforce as well as its culture of entrepreneurship, high-quality places where businesses can thrive and its rich historic and cultural identity and wealth of environmental assets'.

The Council's Vision for the District is considered to be highly compatible with a range of SA Objective. It would help to ensure that investment and enterprise in Bradford respects the needs of the local area and to increase local levels of investment, spend, economic growth and the number of business start-ups and survival. The District's employment rate would be likely to increase, as too would average earnings, with the number of high-quality jobs suited to the local workforce increased. These new employment opportunities would provide local people with the opportunities to build their skills whilst enhancements to local education facilities could be an indirect result of economic growth in the District.

Economic growth and social transformation across Bradford would be likely to help secure the delivery of residential development that satisfies local requirements and improves the quality and cohesiveness of neighbourhoods. Higher rates of employment with higher-quality jobs as well as new affordable housing would make a significant contribution towards reducing deprivation, poverty, inequality and homelessness with subsequent benefits to the health and safety of Bradford's residents. Furthermore, the new economic development and investment would be likely to enhance the recreational, cultural and leisure offering in the District.

The Vision gives considers closely the important biodiversity, cultural heritage and character of Bradford and it is likely that it would help to ensure that habitats, landscapes, townscapes, heritage assets and historic areas are protected and enhanced by development.

There is a risk that the significant economic development could lead to an increase in the number of local car movements along with increased pressure on the capacity of public transport options. However, it is understood that the pursuit of 'sustainable development' and 'high-quality places' includes enhancing the capacity and quality of walking, cycling and public transport options as well as working to reduce the distances people need to travel, or reducing their need to travel all together, and this would help to ensure that local movements are efficient and relatively low-emission. Whilst 'sustainable development' likely includes a consideration of reducing the District's contribution to the causes of climate change (e.g. managing greenhouse gas emissions and carbon sink capacity), the Vision could potentially place greater emphasis on the need to this in light of the economic and social transformation being sought.

4.2 B1: Strategic Objectives

In order to achieve the Vision, the Council have proposed the following 18 Strategic Objectives for the Local Plan:

1. To recognise and fully exploit the role and transformational potential of the City of Bradford and the towns along Airedale and Wharfedale as dynamic locations of choice for housing and economic growth within the Leeds City Region.
2. To ensure that the District's requirements for housing, business and commerce are met in full in sustainable locations that reduce the need to travel and are well served by public transport and services, whilst prioritising, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.
3. Ensure that the appropriate critical infrastructure (including green, social and technological) is delivered to support growth and the timing of development and infrastructure delivery are aligned.
4. To significantly improve the quality of new development and ensure that new housing schemes create inclusive, accessible, distinctive and healthy places that incorporate green streets and spaces and make efficient use of resources;
5. To provide a range of quality dwellings, in terms of type and affordability, in well-designed liveable neighbourhoods to cater for the current needs and future growth of the District and to ensure that the housing needs of all parts of the community including specialist needs are met.
6. To promote the role of the Bradford District in the Leeds City Region economy by creating conditions for housing growth, city living and enterprise where business thrives, generating opportunity, prosperity and jobs.
7. To promote and support a successful growing economy with a wide range of high-quality employment opportunities, by fostering indigenous firms and by attracting inward investment in the high value technology, creative, innovative and knowledge-based industries.
8. To promote, manage and develop the image and the role of Bradford City Centre as a regionally significant business, commercial, shopping, civic and cultural area.
9. To develop our skills, training and education base through new development and support the University of Bradford and the District's colleges and schools in investing in buildings and spaces to ensure a well-educated and skilled workforce.
10. To improve and develop excellent public transport and highway systems to increase the level of accessibility within the District and establish strong connections with other parts of the Leeds City Region and beyond through high speed rail connections and an integrated transit and public transport system ensuring safety, efficiency and sustainability.
11. To ensure that Bradford is a diverse city where socially inclusive and vocal communities live and where the needs of citizens are met through improved access to good quality homes, jobs, shopping, cultural facilities, health and education provision and community facilities for a growing population.
12. To provide a clean, safe, secure, sustainable, attractive and accessible built and natural environment in order to reduce the fear of crime and disorder and foster a shared sense of civic pride and responsibility, supporting the social, economic and physical regeneration of neighbourhoods across the District.
13. Safeguard, enhance and promote the diverse historic built and natural heritage of the District which helps reinforce the local distinctiveness of places.
14. To improve air quality and reduce the impact of climate change through mitigation and adaptation, particularly through reducing emissions, energy consumption, the risk of flooding, and promoting the use of renewable and low carbon energy and securing the means to become locally self-sufficient.
15. Provide accessible and varied opportunities for leisure and recreation including access to the countryside, provision of open space and the utilisation of green infrastructure spaces and routes for walking and cycling.
16. Ensure that new development provides a biodiversity net-gain and safeguards and enhances the District's biodiversity assets through careful landscape, woodland and waterways management. In particular the South Pennine Moors and upland fringe.

17. Safeguard and enhance the District’s natural and renewable energy resources, including water, agriculture, woodland and minerals, and promote the sustainable management of waste and recycling.
18. To create and deliver healthy places in Bradford District that maximise health and well-being benefits for residents and visitors, provide opportunities for healthy lifestyles and reduce health inequalities.

Table 4-1 present the assessment of the compatibility between Strategic Objectives in the Local Plan with SA Objectives. Overall, the Objectives are all considered to be highly compatible with limited potential for conflict. It is necessary for the Objectives and Vision to be read as a whole – it is likely that the achievement of some Objectives would help to mitigate potentially negative impacts of other Objectives.

Table 4-1: Compatibility of Local Plan objectives with SA Objectives

		-- Major incompatible		- Minor incompatible			O Neutral		? Uncertain		+ Minor compatible			++ Major compatible					
Local Plan Objectives	SA Objectives																		
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
Vision	-	-	-	?	-	-	?	++	-	?	++	++	++	++	++	++	++	++	++
	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	++	++	++	++	++	++	++	++
1	Strategic Objective 1 would be expected to help ensure that there is significant and regenerative residential and economic growth in the District that satisfies local requirements. In addition to the direct contributions to housing, employment and economic growth, this Spatial Objective would be likely to reduce poverty, deprivation, inequality and homelessness and subsequently deliver more cohesive and sustainable communities within which local people can pursue safe, secure and healthy lifestyles. There is a risk that this development would not conform with some SA Objectives due to the likely increase in energy consumption, waste generation, greenfield development, habitat loss and fragmentation, water consumption and air pollution associated with new development. Impacts on character, climate change resilience and transport largely depend on the location of development in relation to flood risk zones, landscapes/townscapes and public transport options.																		
2	++	+	++	+	+	+	+	+	++	++	++	++	+	+	+	+	+	++	++
2	Strategic Objective 2 would help to ensure that development requirements in Bradford can be met, including housing and employment requirements. Achieving this would also be likely to reduce poverty, deprivation, inequality and homelessness and subsequently deliver more cohesive and sustainable communities within which local people can pursue safe, secure and healthy lifestyles. There is a commitment to sustainable development and prioritising PDL and this would help to counter the potentially negative impacts of significant levels of residential and economic development on other SA Objectives.																		
3	+	O	O	O	O	+	+	+	+	++	++	++	++	++	++	++	++	++	++
3	Strategic Objective 3 would be expected to help ensure that sites for development are viable and deliverable and subsequently that the development can proceed. This would enable local development requirements to be met. The provision of social, technological and green infrastructure conforms well with natural environment and social-based SA Objectives. GI provides Bradford with a range of ecosystem services, including habitat connectivity, biodiversity value, carbon storage, flood risk alleviation, water filtration and character and setting enhancements.																		
4	O	O	O	O	+	+	+	+	+	+	+	+	++	+	+	++	O	+	+
4	Strategic Objective 4 would conform well with Objectives related to ensuring that the diverse housing needs of the District are met, that neighbourhoods included green and open spaces that offer opportunities for community interaction as well as supporting wildlife whilst benefitting the local character. Strategic Objective 4 also conforms well with improving the health of local people and enhancing the cohesiveness of communities and accessibility for all.																		
5	+	O	+	O	O	O	++	++	+	+	++	++	++	++	++	++	+	+	+
5	Strategic Objective 5 would be expected to help ensure that not only are Bradford’s development requirements satisfied over the Plan period, including type and affordable housing requirements, and in so doing reduces poverty, deprivation, inequality and homelessness, but that the development is of a high-quality design that protects and enhances the local character and setting.																		
6	-	-	-	?	-	-	?	?	-	O	++	++	++	++	++	++	++	++	++
6	Strategic Objective 6 would be expected to help ensure that there is significant and regenerative economic development in Bradford. There is a risk that the energy, water and materials consumption associated with this development, as well as the travel and other sources of emissions, could discord with some SA Objectives. Impacts on some																		

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Local Plan Objectives	SA Objectives																		
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
	SA Objectives, such as climate change resilience, are uncertain due to the unknown location of development in relation to constraints.																		
7	-	-	-	?	-	-	?	?	-	0	++	++	++	++	++	++	++	++	++
	Strategic Objective 7 would be expected to help ensure that there is significant and regenerative economic development in Bradford. There is a risk that the energy, water and materials consumption associated with this development, as well as the travel and other sources of emissions, could discord with some SA Objectives. Impacts on some SA Objectives, such as climate change resilience, are uncertain due to the unknown location of development in relation to constraints.																		
8	-	-	-	?	-	-	?	++	-	0	++	++	+	++	+	+	+	++	++
	Strategic Objective 8 would be likely to encourage investment and enterprise in the District and to increase the number of high-quality employment opportunities accessible to local people. The Objective would also be likely to help enhance the cultural, recreational and communal spaces, facilities and activities on offer in the District. There is a risk that the energy, water and materials consumption associated with this development, as well as the travel and other sources of emissions, could discord with some SA Objectives. Impacts on some SA Objectives, such as climate change resilience, are uncertain due to the unknown location of development in relation to constraints.																		
9	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	++	++	++
	Strategic Objective 9 would be expected to help ensure that education facilities and opportunities in Bradford improve in quality and capacity. This would also be likely to provide local people with more employable skills and to increase the local pool of potential employees for businesses in the District.																		
10	++	0	0	0	0	0	0	0	++	++	0	++	+	+	+	+	+	+	+
	Strategic Objective 10 would be expected to conform with several SA Objectives as a result of the improvements to the quality and capacity of public transport options. The enhanced accessibility should also better enable people to reach key services, amenities and employment areas efficiently. Short and lower-emission travel would conform well with SA Objectives related to improving air quality and reducing GHG emissions.																		
11	+	0	0	0	0	0	0	0	+	+	+	++	++	++	++	++	++	++	++
	Strategic Objective 11 conforms well with several SA Objectives, particularly those related to cohesive communities, recreation and culture and the accessibility of services.																		
12	0	0	0	0	0	0	0	0	0	0	++	++	++	++	++	++	++	+	+
	Strategic Objective 12 would be likely to help ensure that new development makes a positive contribution to the local character and setting whilst being of a high-quality design that enables secure and safe lifestyles at home whilst contributing towards the cohesiveness of communities. High-quality design could increase footfall in central areas whilst the intention of providing an attractive and safe natural environment could enhance the local outdoor recreational offering whilst benefitting GI, habitats and species. It therefore conforms well with several SA Objectives.																		
13	0	0	0	0	0	0	++	++	0	0	0	0	0	++	0	0	0	0	0
	Strategic Objective 13 naturally conforms well with SA Objectives related to cultural heritage, cultural activities as well as townscape character.																		
14	++	0	0	++	0	0	0	0	++	++	0	0	0	0	0	0	0	0	0
	Strategic Objective 14 conforms with SA Objectives related to reducing Bradford’s carbon footprint as well as enhancing its resilience to the potential impacts of climate change, particularly flooding. Achieving this Strategic Objective would likely require enhancements to the public transport offering in the District. Reducing GHG emissions would be expected to conform well with efforts to improve air quality.																		
15	++	0	0	+	0	+	0	0	++	++	0	++	++	++	++	+	0	+	+
	Strategic Objective 15 conforms well with SA Objectives related to community cohesiveness, recreation, culture and the accessibility of services. Enhanced walking and cycling options would contribute to a more efficient and lower-emissions transport sector whilst providing physical activity opportunities to local people.																		

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Local Plan Objectives	SA Objectives																			
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy	
16	+	0	0	+	+	++	++	+	0	0	0	0	0	+	0	0	0	0	0	+
Strategic Objective 16 conforms well with several SA Objectives. The protection and enhancement of biodiversity and ecological connectivity is relevant to several themes of SA, including the biodiversity, landscape, heritage, and culture related SA Objectives.																				
17	++	++	++	0	++	++	+	+	0	0	0	0	0	+	0	+	0	0	0	0
Strategic Objective 17 conforms well with SA Objectives on renewable and efficient energy, biodiversity, land and soils as well as materials and waste.																				
18	0	0	0	0	0	0	+	+	0	0	+	+	+	+	+	++	0	0	0	0
Strategic Objective 18 conforms well with objectives related to improving health and reducing health inequalities, as well as cohesive communities, high-quality home environments and safety & security.																				

5 Policies

5.1 B2: Policies

5.1.1 Policies being carried forward to the Draft Local Plan from the Adopted Core Strategy

The Local Plan proposes a range of strategic and thematic policies that conform with the Local Plan Objectives and would help to achieve the Council's vision for the District. Arriving at the options considered for the Local Plan has been a lengthy process that also included the preparation process of the now Adopted Core Strategy. The Draft Local Plan process started as a partial review of the now adopted Core Strategy, which was due to be accompanied by a Site Allocations DPD. However, due to changes in government guidance, the approach was revised, and a new Draft Local Plan has been developed. This will replace the Adopted Core Strategy when it is adopted, although a number of policies, as described, will remain the same.

The Core Strategy policies not being revised will be re-adopted by the Council through the Local Plan. As they would combine with reviewed policies to form a new Local Plan, that replaces the Adopted Core Strategy, it is necessary to ensure that they are accompanied by an up-to-date SA appraisal.

The first stage in the production of the Adopted Core Strategy 2017 involved the identification of key issues associated with the District and the development of initial options for the Core Strategy. A Further Issues and Options¹³, which focused specifically on the spatial vision, strategic objectives and spatial options for the location of development, was produced and consulted on between January and March 2008.

The Issues and Options documents identified a range of reasonable alternatives for proposals in the Core Strategy. This included options for policies, as per **Table 5-1**, for which there were several options considered and appraised in the SA at the time and which were appraised in the March 2009 SA Report¹⁴. The SA of the Adopted Core Strategy also considered reasonable alternatives to the spatial strategy (i.e. the overall approach to the distribution of development in Bradford) as per **Table 5-2**. The Spatial Strategy, as developed through this process, has been carried through to the Draft Local Plan.

The Core Strategy adopted by the Council in 2017 was subject to an SA process. The results of this process are available on the Council's website¹⁵. The SA at the time appraised all proposals in the adopted Core Strategy, as well as their reasonable alternatives. The appraisal of the policies carried out in the SA of the Adopted Core Strategy used a different SA Framework to the one in this SA Report and so new assessments of these policies have been carried out for completeness and to ensure all policies have been appraised in a consistent manner. Whilst the SA Frameworks are different, they follow the same themes, and therefore, the current and previous SA findings align. This is an important aspect of the cumulative effects assessment which requires the combined effects of all policies to be appraised and therefore requires a comparable appraisal approach to achieve this.

The reasonable alternatives discussed in **Table 3-1** and **Table 5-2** are not being re-assessed in this SA Report. The Local Plan is a partial review, so some options explored for the Adopted Core Strategy and its SA are not now being re-opened for discussion as such options are outside the scope of the partial review.

¹³ Bradford Local Development Framework. 2008. Core Strategy. Further Issues and Options for Consultation, Initial Sustainability Appraisal. Available online at: <https://www.bradford.gov.uk/Documents/planningStrategy/02/1%20Public%20consultation%20documents//Initial%20sustainability%20appraisal.pdf> [Accessed: 28.01.21]

¹⁴ Entec. 2009. Sustainability Appraisal of the Bradford Core Strategy, Issues and Options Report. Available online at: <https://www.bradford.gov.uk/Documents/planningStrategy/11//Sustainability%20appraisal%20-%20issues%20and%20options%20report.pdf> [Accessed: 27.01.21]

¹⁵ Available online at: <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/?Folder=11#> [Accessed: 27.01.21]

This SA only focusses on reasonable alternatives to aspects of the Core Strategy that are being re-drafted following the adoption of the Core Strategy. The intention of **Table 5-1** and **Table 5-2** is to show that, although this SA does not assess reasonable alternatives to those policies not being changed, the SA of the Adopted Core Strategy did previously assess their reasonable alternatives.

Table 5-1: Policy reasonable alternatives considered during the preparation of the Adopted Core Strategy 2017 and assessed in the accompanying SA Report¹⁶

Reasonable alternative	Number of Alternatives
Housing	
Options for ensuring that effective use is made of land and buildings	2
Options for ensuring that dwellings are provided in the right places to meet local needs	6
Options for meeting needs for affordable homes	9
Options for achieving the correct balance of new dwellings in terms of type and size	4
Options for achieving the correct balance of house building	2
Economy and jobs	
Options for the development of housing on employment land	3
Options for the sustainability performance of dwellings	3
Options for ensuring there is the right amount of land allocated for employment use	4
Options for allocating land for employment uses	5
Options for protecting existing employment land and building stock	6
Options relating to the diversification of the economy	2
Transport and movement	
Options contributing to the enhancement of existing accessibility to jobs, services and facilities	13
Options for influencing the level of car use and road congestion	8
Options for improving road safety	3
Options for supporting economic activity and regeneration efforts	3
Options for supporting the sustainable movement of freight	4
Community facilities	
Options for ensuring new and existing healthcare and education facilities are accessible, well served by public transport and promote social inclusion	8
Options for ensuring that all communities have access to a high-quality green space and sport and recreation facilities	10
Options for ensuring all sections of the community have access to retail provision	5
Options for ensuring all sections of the community have access to local community and cultural facilities	8
Environment	
Options for protecting water resources and quality	2
Options for protecting air quality	2
Options for protecting biodiversity resources	4
Options for biodiversity enhancement	3
Options for protecting landscape character	8
Options for protecting heritage assets	4
Options for achieving high standards of design for new development	4

¹⁶ Ibid

Reasonable alternative	Number of Alternatives
Options for addressing sustainable design	3
Options for renewable energy sources	5
Options for regeneration and flood risk	4
Options for aggregates provision	3

Table 5-2: Reasonable alternatives to the spatial strategy proposed in the 2017 Core Strategy and assessed in the accompanying SA Report¹⁷

Spatial option	Housing	Employment
SO1: RSS Settlement Hierarchy Options	65% (32,500) of homes in sub-regional city (Bradford/Shipley/Baildon) 30% (15,000) homes in Principal Towns 5% (2,500) homes in Local Service Centres	Employment development would be concentrated in existing employment zones, South and East Bradford and Keighley. Local Service Centres would only provide enough employment to cater for local needs.
SO2: Continuation of the RUDP	50% (25,000) of homes in sub-regional city (Bradford/Shipley/Baildon) 30% (15,000) homes in Principal Towns 20% (10,000) homes in Local Service Centres	Employment development would be concentrated in existing employment zones, South and East Bradford and the Airedale Corridor. Local Service Centres would only provide enough employment to cater for local needs.
SO3: Focussed growth-points around the sub-regional city	70% (35,000) of homes in sub-regional city (Bradford/Shipley/Baildon) 20% (10,000) homes in Principal Towns 10% (5,000) homes in Local Service Centres	Employment development would be concentrated in existing employment zones, South Bradford and growth areas around Bradford/Shipley/Lower Baildon and Keighley. Local Service Centres would only provide enough employment to cater for local needs.
SO4: Dispersed Growth Points	65% (32,500) in the sub-regional city (Bradford/Shipley/Baildon) 10% (5,000) homes in Principal Towns 20% (10,000) homes in Local Growth Centres 5% (2,500) in Local Service Centres	Employment development would be concentrated in existing employment zones, South Bradford and growth areas around the Sub Regional City and the Airedale Corridor. Local Service Centres would only provide enough employment to cater for local needs.
Preferred Spatial Option	68% (28,650) in sub-regional city (Bradford/Shipley/Baildon) 16% (6,700) Principal Towns 8% (3,400) Local Growth Centres 8% (3,350) Local Service Centres	72% (97ha) Regional City of Bradford 21% (28ha) Airedale Corridor 7% (10ha) Wharfedale Corridor

5.1.2 Policy Options in the Draft Local Plan

For all new policies and updated Core Strategy policies to be replaced by the Draft Local Plan, the Council has identified a range of reasonable alternatives. This includes reasonable alternatives for the housing need, spatial distribution, core policies and various development management policies.

The Council is intending to reset the plan period from 2020 to 2038, which allows for a minimum implementation length of 15-years for strategic policies. By increasing the plan end date from 2035 to 2038 this allows for slippage and uncertainties in the plan period and aims to ensure that the plan looks ahead over a minimum 15-year from the date of anticipated adoption in 2023. A number of alternatives to the preferred option for the plan period have been considered and discounted by the Council.

¹⁷ Entec. 2009. Sustainability Appraisal of the Bradford Core Strategy, Issues and Options Report. Available online at: <https://www.bradford.gov.uk/Documents/planningStrategy/11/Sustainability%20appraisal%20-%20issues%20and%20options%20report.pdf> [Accessed: 27.01.21]

Table 5-3 presents the options for policies in the Local Plan, including policies that are carried forward from the Adopted Core Strategy and so do not have reasonable alternatives, as well as the policies that are being revised or are new and so do have reasonable alternatives. All of the policy options listed in **Table 5-3**, as well as their reasonable alternatives, have been assessed to the same level of detail to identify their likely sustainability impacts. This chapter provides an overview of the sustainability performance of all options and alternatives, as well as an overview of why the preferred options were selected in light of the reasonable alternatives dealt with.

Table 5-3: Preferred options for policies in the Local Plan and their reasonable alternatives

Local Plan Policy Ref.	Old Policy Ref.	Policy name / preferred option	Under review?	Reasonable alternatives
Strategic Policies				
Development Strategy				
SP1	P1	Delivering Sustainable Development	Yes	SP1RA1, SP1RA2
SP2	SC1	Spatial Priorities	Yes	SP2RA1
SP3	SC4	Hierarchy of Settlements	Yes	SP3RA1
SP4	SC5	Location of Development	Yes	SP4RA1, SP4RA2, SP4RA3, SP4RA4
SP5	SC7	Green Belt	Yes	SP5RA1, SP5RA2
Planning for Prosperity				
SP6	EC1, EC2 & EC4	Economic Growth	New policy	SP6RA1
SP7	TR1 & TR3	Planning for Sustainable Transport	New policy	SP7RA1
Planning for Homes				
SP8	HO1, HO2, HO4, HO3, HO6 & HO7	Housing Growth	New policy	SP8RA1, SP8RA2, SP8RA3, SP8RA4, SP8RA5, SP8RA6, SP8RA7, SP8RA8
Planning for Places and Communities				
SP9	SC2	Climate Change, Environmental Sustainability and Resource Use	Yes	SP9RA1, SP9RA2, SP9RA3
SP10	SC6	Green Infrastructure	Yes	SP10RA1, SP10RA2, SP10RA3
SP11	SC8	Protecting the South Pennine Moors and their Zone of Influence	Yes	SP11RA1
SP12	-	Strategic Planning for Minerals	New policy	SP12RA1
SP13	Waste Management DPD	Waste Management Infrastructure	New policy	SP13RA1
SP14	SC9	Making Great Places	Yes	SP14RA1, SP14RA2
SP15	SC10	Creating Healthy Places	Yes	SP15RA1, SP15RA2, SP15RA3
SP16	SC3	Working together to make Great Places	Yes	SP16RA1
Thematic Policies				
Planning for Prosperity				
EC1	-	Employment Land Delivery and Strategic Sites	New policy	EC1RA1, EC1RA2
EC2	-	Enterprise, Business and Employment Zones	New policy	EC2RA1, EC2RA2, EC2RA3, EC2RA4
EC3	EC2 & EC3	Employment and Skills	Yes	EC3RA1, EC3RA2, EC3RA3

Local Plan Policy Ref.	Old Policy Ref.	Policy name / preferred option	Under review?	Reasonable alternatives
		Delivery		
EC4	EC5	City, Town, District and Local Centres	Yes	EC4RA1, EC4RA2, EC4RA3, EC4RA4
TR1	TR7	Strategic Transport Delivery	Yes	TR1RA1, TR1RA2, TR1RA3
TR2	TR3 & TR7	Transport and Environment	Yes	TR2RA1
TR3	-	Transport and Development	New policy	TR3RA1
TR4	TR4	Transport and Tourism	No	No - it is proposed to carry forward the policy in its current form from the adopted Core Strategy
TR5	TR2	Parking	Yes	TR5RA1
TR6	TR6	Freight Priorities	Yes	TR6RA1
TR8	TR8	Aircraft Safety	Yes	TR7RA1
Planning for Homes				
HO1	HO4	Housing Delivery and Strategic Sites	Yes	HO1RA1, HO1RA2
HO2	HO5	Housing Density	Yes	HO2RA1, HO2RA2, HO2RA3
HO3	-	Urban Housing	New policy	HO3RA1, HO3RA2
HO4	HO8	Housing Mix	Yes	HO4RA1, HO4RA2
HO5	HO11	Affordable Housing	Yes	HO5RA1, HO5RA2, HO5RA3
HO6	-	Custom and Self-Build Housing	New policy	HO6RA1
HO7	-	Specialist Housing and Accommodation	New policy	HO7RA1, HO7RA2
HO8	HO12	Sites for Gypsies, Travellers and Travelling Showpeople	Yes	HO8RA1
HO9	HO9	Housing Standards	Yes	HO9RA1, HO9RA2
HO10	HO10	Overcrowding and Vacant Homes	No	HO10RA1, HO10RA2
Planning for Places and Communities				
EN1	-	Green Infrastructure Standards	New policy	EN1RA1, EN1RA2, EN1RA3
EN2	EN2	Biodiversity and Geodiversity	Yes	EN2RA1, EN2RA2
EN3	EN5	Trees and woodlands	Yes	EN3RA1
EN4	EN3	Historic Environment	No	No - the policy is considered comprehensive in scale
EN5	EN4	Landscape	No	No - the policy is succinct and grounded in the evidence base and SPD work
EN6	-	Countryside and Development	New policy	EN6RA1, EN6RA2
EN7	EN7	Flood Risk	Yes	No - the policy is strengthened relating to Surface Water run-off, SuDS and Natural Flood Management. The policy has been updated to reflect new SFRA and other flood risk management strategies. However, with a number of new river models being prepared by the Environment Agency, the SFRA will require a further update and consequentially the policy may require further changes.
EN8	-	Air Quality	New policy	EN8RA1, EN8RA2, EN8RA3
EN9	EN8	Environmental Protection	Yes	EN9RA1, EN9RA2
EN10	EN6	Energy	Yes	EN10RA1, EN10RA2, EN10RA3,

Local Plan Policy Ref.	Old Policy Ref.	Policy name / preferred option	Under review?	Reasonable alternatives
				EN10RA4
EN11	EN10 (A-D) & EN11 (A-C)	Mineral Supply and Landbanks	Yes	No - the policy approach has not been amended
EN12	EN12	Mineral Allocations	New policy	EN12RA1
EN13	EN13	Mineral Safeguarding	Yes	No - it is not proposed to amend the policy approach. It remains broadly in line with national policy.
EN14	-	Mineral Areas of Search	New policy	EN14RA1
EN15	EN13	Managing Development and Operation of Mineral Sites	Yes	EN15RA1
EN16	-	Mineral Site Restoration and Aftercare	New policy	No - National policy requires Mineral Planning Authorities set out a planning policy framework to support the reclamation of mineral workings at the earliest opportunity, and deliver high quality restoration and aftercare of sites
EN17	EN11 (C&D)	Energy Minerals	Yes	EN17RA1, EN17RA2
EN18	-	Waste Management Development	New policy	EN18RA1
EN19	-	Waste Management Allocations	New policy	EN19RA1
EN20	Waste Management DPD	Safeguarding Waste Management Facilities	Yes	No - the policy has not been amended
EN21	Waste Management DPD	Sustainable Waste Management in Development	Yes	No - the policy has not been amended
CO1	EN1	Protection and improvements in provision of Open Space and Recreation Facilities	Yes	CO1RA1
CO2	-	Community Facilities	New policy	CO2RA1, CO2RA2
CO3	-	Health Impact Assessments	New policy	CO3RA1, CO3RA2, CO3RA3
DS1	DS1	Achieving Good Design	Yes	DS1RA1, DS1RA2
DS2	DS2	Working with the Landscape	Yes	DS2RA1, DS2RA2
DS3	DS3	Urban Character	Yes	DS3RA1, DS3RA2
DS4	DS4	Streets and Movement	Yes	DS4RA1, DS4RA2
DS5	DS5	Safe and Inclusive Places	Yes	DS5RA1, DS5RA2
Implementation, Delivery and Monitoring				
ID1	ID3	Infrastructure Delivery	Yes	ID1RA1, ID1RA2
ID2	ID2	Developer Contributions	Yes	No - the policy has been subject to a minor factual update to the reflect the adopted of the Community Infrastructure Levy (CIL) charging schedule in July 2017
ID3	ID5 & ID8	Viability	Yes	No - the policy seeks to ensure consistency with national planning policy

5.2 B3 & B4: Preferred Policy Appraisals

All policy options and reasonable alternatives listed in **Table 5-3** were appraised in line with the rationale presented in **Table 5-4**. The detailed results of this process are presented in **Appendix D**.

The Council has considered the options available for the Local Plan and identified their preferred policy options in light of the alternatives dealt with. **Table 5-4** presents the list of reasonable alternatives and the Council's justification for rejecting these. Detail on the contents of the reasonable alternatives and how they compare to the preferred options can be found in **Appendix D**. It is noted that the preferred policy assessments are provided as a draft for consultation. This is the first stage in an iterative process of policy development and will be refined as the policies develop as a result of the consultation process.

Table 5-4: Justifications for the rejection of reasonable alternatives

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
Plan Period		2013-2035/36/37/38	This alternative results in technically a plan period of at least 22 years, but a significant proportion of the plan is already set in the 'past' – the Government's Standard Method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addressed projected household growth and historic under-supply.
		2020-2035	This alternative results in a 15-year plan period but the risk that if that plan is adopted in 2023, this will leave only 12 years for strategic policies.
		2021-2038	This alternative results in a 17-year plan period and 15 years for strategic policies (on adoption of the plan in 2023) – requires a roll forward of monitoring data to 31st March 2021 with related uncertainties – information would need to be estimated at this time.
		2022-2038	This alternative results in a 16-year plan and 15 years for strategic policies (on adoption of the plan in 2023) – but requires potentially up to two years of additional housing monitoring data up to the start of the plan period (2022), with related estimate uncertainties.
		2020-40	This alternative produces a long range 20-year plan with 17-year strategic policies (on adoption in 2022), however the further the plan period, potentially the more unreliable the data and would in practical terms with an exhausted supply of non-Green Belt land require the identification of additional Green Belt land to release to meet higher total housing need figures.
SP1	SP1RA1	Retain the policy as adopted in the Core Strategy.	The policy as drafted was chosen due to the importance of emphasising how the achievement of the 3 objects are interdependent and to signpost some of the key challenges and the key initiatives and responses which the Local Plan and the Council are putting in place.
	SP1RA2	Delete the policy as the aspects are to some extent already covered by the NPPF. Allow the spatial strategy and different policies which will contribute to the 3 objectives to speak for themselves.	
SP2	SP2RA1	Update the policy but consider a less extensive range of changes	This does not deliver a comprehensive strategic approach to a key overview policy.
SP3	SP3RA1	A more limited range of changes	This did not fully align to the changing context in which the policy is drafted.
SP4	SP4RA1	Do not review the policy i.e. policy remains unchanged from the adopted core strategy policy.	There was no clear rationale for applying a prioritisation to local Green Belt release ahead of larger urban extensions; the reordered movement hierarchy reflects changes made to other policy areas to reinforce the carbon reduction and air quality improvement priorities. Changes to the road hierarchy are in line with other updated policies.
	SP4RA2	Undertake more limited changes to the policy and retain Green Belt	This could limit the opportunities for larger urban extensions to deliver ahead of smaller 'local' Green Belt

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		prioritisation.	development opportunities.
	SP4RA3	Undertake more limited changes to the policy and remove the Green Belt prioritisation element but retain movement and road hierarchy as drafted in the adopted core strategy policy.	This does not fully align with updated transport and other policies, focused on carbon reduction and air quality improvements.
	SP4RA4	More limited changes to the policy	This would provide a less strategic, comprehensive approach.
	SP4RA5	Delete individual policy and integrate within other policies	The policy sets out a clear sequential framework for development which can be read across the Local Plan.
	SP5RA1	Exclude sites from the policy listing and refer to plan sections	As drafted the policy provides clarity as the location of changes to the Green Belt and related sites
SP5	SP5RA2	Include a section on safeguarded land	Evidence is not sufficiently developed to support inclusion at this stage.
SP6	SP6RA1	Update the policy but consider a less extensive range of changes	This would not deliver a comprehensive strategic approach to a key overview policy.
SP7	SC7RA1	Update the policy but consider a less extensive range of changes	This would not deliver a comprehensive strategic approach to a key overview policy.
SP8	SP8RA1	Meet the Cities and Urban Area uplift on the Local Housing Need baseline figure of 2,300.	This would require accommodating over 10,000 extra homes, and has associated sustainability impacts
	SP8RA2	The second alternative is to lower the housing requirement below the Local Housing Need baseline figure.	This could potentially result in the release of fewer Green Belt sites, however those sites and locations have been assessed as sustainable alternatives for development and their omission would increase the gap between housing supply and need and reduce the level of new affordable housing provided.
	SP8RA3	To omit the 'components of supply' element of the policy entirely	This would undermine the clarity and transparency for stakeholders on how the requirement is to be met.
	SP8RA4	Baseline population proportionate - assigns targets based on the proportion of the existing population within that settlement area	This would result in a substantially greater amount of green belt releases than the preferred option and would assign very little housing to the key regeneration priority areas of the City Centre and Canal Road Corridor
	SP8RA5	Adopted Core Strategy proportions - distributes the district wide housing requirement in exactly the same proportions as in the adopted Core Strategy	This would result in significantly more green belt releases than the preferred option and would provide less support to regeneration in the City Centre and Southern Gateway
	SP8RA6	Avoid releasing any Green Belt land - provides a distribution which could be achieved on non-Green Belt land	This would potentially result in the provision of 5,000-6,000 fewer homes than the preferred option and thus housing provision would fall substantially below the housing need.
	SP8RA7	Avoid releasing any green belt land with density uplift - utilises non green belt land and makes up the shortfall by assuming that significant uplift in yields (compared to current SHLAA assumptions) could be achieved	It is doubtful that this could be achieved given the extent to which development is already focused on the urban areas and the City Centre in particular. It is therefore likely that this approach would fall short of the housing need.
	SP8RA8	Greater dispersal, decreasing the concentration on the Regional City and dispersing more development to higher value areas of the district to the bottom two tiers of the settlement hierarchy.	This would increase the overall scale of green belt releases, and significantly increase green belt releases in the Local Growth Centres and Local Service Centres compared to the preferred option.
SP9	SP9RA1	Do not include a specific policy on climate change. Make reference within other policies of the plan.	Although this may result in an integrated approach to tackling climate change, it would not provide the strategic approach necessary to address this important theme.
	SP9RA2	Do not include a specific target within the policy.	By including a specific target this provides a more measurable focus to achieving reductions in greenhouse gas emissions as part of new developments. Without the

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
			target, there would less ambition in making reductions in emissions.
	SP9RA3	Adopt a more succinct policy with technical detail referenced in a new Supplementary Planning Document (SPD)	There would be a risk that the policy would provide insufficient detail and the SPD may lack a useful planning policy framework.
SP10	SP10RA1	Do not review the policy i.e. it remains unchanged from the adopted Core Strategy.	It was unclear how the policy would directly inform developments and fill gaps within the existing GI network.
	SP10RA2	The second alternative is to include a detailed map of GI in Bradford which identifies targeted areas for improvement	This alternative may form part of a revised policy approach once the Bradford Green Infrastructure Strategy has been prepared. The policy could make specific reference to supporting the actions set out in the Strategy.
	SP10RA3	The third alternative is to reduce the policy to a more succinct format and supported by an SPD on GI.	With this alternative there is the risk that the policy would provide insufficient detail and the SPD may lack a useful planning policy framework.
SP11	SP11RA1	This alternative is for minor text changes to policy for clarification.	The evidence informing the HRA is currently under review and therefore it is possible that Policy SP11 will see further amendments, particularly in terms of the 2.5m buffer (Zone B) and its application in existing urban areas adjacent to the SPA/SAC as the body of evidence strengthens.
SP12	SP12RA1	This alternative is to not include a specific policy and rely on national planning policy set out in the NPPF and Planning Practice Guidance.	Without a policy there is a risk that there would not be a strategic approach to planning for minerals.
SP13	SP13RA1	Retain policies WM1, WM2, and W2 as currently drafted in the adopted core strategy DPD and Waste Management DPD	This alternative would involve limited updated to the policy wording and reasoned justification.
SP14	SP14RA1	The first alternative is to no update the policy	This alternative would still provide a level of policy support for the SPD Homes and Neighbourhoods: a guide to designing in Bradford but it would not be as comprehensive.
	SP14RA2	This alternative would consider a more extensive rewrite of the strategic design policy to more closely follow the structure set out in Homes and Neighbourhoods: a guide to designing in Bradford	This could allow for easy cross-reference between the two documents, but it would likely overlap with other related policy areas and require a wider rethink of the overall structure of the plan.
SP15	SP15RA1	The first alternative is to not introduce a policy.	This alternative would rely on health themes within a range of current policies – may make it difficult for users of the plan to fully consider the importance of healthy communities at a strategic level.
	SP15RA2	The second alternative would Integrate and further develop the Health Impact Assessment (HIA) within the policy.	As a strategic policy the HIA is referenced but further developed through a more development management orientated policy.
	SP15RA3	The third alternative would be to significantly reduce scale of policy and refer to SPD for supporting detail	There is a need for effective policies within the Local Plan and potential risk that this alternative would not provide sufficient detail.
SP16	SP16RA1	The alternative considered included a more limited range of changes.	This did not full align to the changing context within which the policy is drafted.
EC1	EC1RA1	The Council considered splitting the policy into two and developing non-strategic and strategic employment land policies	It is generally easier to find and reference within single policy structure.
	EC1RA2	The second alternative was to keep a 'looser' policy structure and list sites in a table (in policy or referenced outside)	The preferred option includes site listing within a delivery strategy or framework with further referencing and detail available within section 5 of the plan.
EC2	EC2RA1	The first alternative considered was to	This would not be as simple as a single policy layout.

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		have individual policies for each type of zone.	
	EC2RA2	The second alternative was to combine zonal areas.	While in some cases there is a lot of geographical cross-over between the zones their functions differ, and multiple zone listing allows for a diverse approach to business retention, regeneration and inward investment.
	EC2RA3	The third alternative was to combine employment site and zonal policy.	This was considered too complex.
	EC2RA4	The fourth alternative was to move threshold levels and criteria for change of use.	Policy introduces a degree of flexibility but also a clear focus upon protecting employment uses and activities. The policy was rejected as it would not achieve the targeted results.
EC3	EC3RA1	The Council considered having no specific policy for EC3	This would fail in practical policy terms to address key issues.
	EC3RA2	The second alternative was to have different thresholds with a variety of options.	The thresholds have been set to incentivise local skills and labour opportunities without compromising viability, but further work will be required on viability testing.
	EC3RA3	The final alternative was to have a more limited scale policy.	This would not support a comprehensive package of measures.
EC4	EC4RA1	This first alternative was to have no or limited changes to the policy from the CSPR	This alternative would not fully reflect the evidence base, from the Bradford District Retail and Leisure Study
	EC4RA2	The second alternative is to have a radically reduced policy	This alternative may not provide a full policy framework to the District's diverse centre.
	EC4RA3	The third alternative is to split the policy into individual policies covering specific topics.	The single policy approach provides ease of use.
TR1	TR1RA1	Less extensive changes and more compact policy.	This alternative would not provide a comprehensive approach to transport project delivery.
	TR1RA2	Break the policy approach into a series of smaller topics or themes	This may add to the complexity
	TR1RA3	This alternative would be to reference projects in a table outside the policy in the reasoned justification rather than linked to transport topics within the policy	This could cause confusion over what forms the policy detail.
TR2	TR2RA1	To integrate the policy focus within other transport or environment policies.	The preferred option sets out clearly the interdependence of transport and the environment.
TR3	TR3RA1	To integrate the policy focus within other transport policies or within more generic development management policy	The current stand-alone policy focus provides a single point of reference for application / development related considerations.
TR4	-	No reasonable alternative considered	It is proposed to carry forward the policy in current form from the adopted Core Strategy
TR5	TR5RA1	To integrate the policy focus within other transport policies or within more generic development management policy	The current stand-alone policy focus provides a single point of reference for application / development related considerations.
TR6	TR6RA1	Update the policy but include a narrow range of policy considerations or reduced range of changes	The policy as drafted presents a focused succinct approach to the policy topic.
TR7	TR7RA1	The alternative is to not update the policy and include reference to part A of the policy only with further planning application considerations within the reasoned justification to the policy	The inclusion of planning application considerations outside the policy would not provide sufficient weighting.
HO1	HO1RA1	The first alternative is to delete the Policy as there is no specific requirement in the NPPF to include	There is still a need to ensure that sites are delivered in a sustainable manner and housing delivery is a key Government and Council goal

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		such a policy or to phase sites	
	HO1RA2	The second alternative is Retain a policy as per the adopted Core Strategy which places sites into one of two phases and holds back the release of a whole tranche of sites until the second half of the plan period.	As indicated above due to the reduced scale of planned growth it is considered less essential for such an approach. While retention of such a policy may have the benefit of supporting the delivery of brownfield land this would be by no means certain to happen given the nature of the housing market, low land values and marginal viability in many such cases.
HO2	HO2RA1	The first alternative is to delete the policy, as net required yields are set out in the Settlement Profiles and on the Site Proformas	This alternative will leave a gap in the Local Plan in terms of other development potential which could come forward from further recycling or windfall sites including small infill of sites of less than 0.20ha.
	HO2RA2	The second alternative is to rewrite the policy with minimum density targets only	This alternative would provide insufficient flexibility in the plan in relation to site and local constraints. Design a policy which specifies the locations in the District where high densities will be required. This would make the policy long and overly complicated. The site proformas already set out where higher density development is more appropriate.
	HO2RA3	The third alternative is to design a policy which specifies the locations in the District where high densities will be required.	This would make the policy long and overly complicated. The site proformas already set out where higher density development is more appropriate
HO3	HO3RA1	This alternative is to not include a specific policy on urban housing schemes in the Local Plan and rely on other Local Plan policies including Housing Mix and Design policies to achieve high quality urban development	Given the need for urban intensification and to secure an appropriate housing mix in urban areas the LP includes a new general policy relating to urban housing schemes
HO4	HO4RA1	The first alternative is to set out specific percentages for the housing mix and the need, type and location of specialist housing for older people on a District to sub area basis.	This approach is considered to be too inflexible with insufficient evidence to justify specific percentage targets on a settlement or sub area basis
	HO4RA2	The second alternative is to not include a housing mix policy in the Local Plan.	This would not support the creation of mixed communities and would not reflect the national policy requirement for new housing meeting the housing needs a range of identified needs in the SHMA
HO5	HO5RA1	The first alternative was to require District wide affordable housing targets.	Evidence of viability indicates that there are variations in values across the District which would mean a District wide target would not be appropriate
	HO5RA2	The second alternative was to require affordable housing targets below the current policy.	This was rejected as evidence of need in the SHMA indicates the need of a local policy response to maximise the delivery of affordable homes. The proposed targets are considered viable and justified by evidence in the SHMA and in accordance with national planning policy
	HO5RA3	The third alternative was a different approach to the tenure split and types of affordable housing required.	The chosen approach to tenure is considered to strike an appropriate balance between flexibility and ensuring locally evidence need for different types of affordable homes are met
HO6	HO6RA1	The alternative was to integrate the policy topic within a wider specialist housing type policy	The proposed policy focus raises the profile of the specific housing policy, which includes a set of detailed considerations which may not be fully drawn out through an integrated policy.
HO7	HO7RA1	The first alternative was to include a specific policy on specialist housing in the Local Plan with targets for settlements/sub areas	This approach is considered to be too inflexible with insufficient evidence to justify specific percentage targets on a settlement or sub area basis
	HO7RA2	The second alternative is to not include a specific policy on specialist	This approach was rejected as it would not support the delivery of identified specialist housing needs in the SHMA

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
		housing in the Local Plan, and to rely on other Local Plan policies to support the delivery of specialist housing needs.	in line with national planning guidance
HO8	HO8RA1	The first alternative was to required pitch targets for the full cultural need over the plan period.	The chosen approach looks to meet the full PPTS need and deliver an identified 5 year supply while supporting the full cultural need through a range of measures and general housing mix policy
HO9	HO9RA1	The first alternative would maintain current policy approach of requiring a proportion of homes on larger site to be accessible but not setting out the detailed requirement in relation to optional technical standards.	This would provide flexibility and individual site circumstances to be considered in determining the proportion of homes meeting optional technical standards National policy is clear any policy should clearly set out the proportions and types of accessible homes required
	HO9RA2	The second alternative would not require the inclusion of the optional technical standards for housing.	Evidence of need clearly demonstrates that a policy requiring optional technical standards for accessible housing is included in the local plan subject to viability. This option would potentially reduce costs of building new homes but not meet identified need.
HO10	HO10RA1	To integrate the policy within other housing policies in the Local Plan	This issue is considered a local housing priority for the council which requires its own policy response
	HO10RA2	The second alternative is to not include a specific policy on overcrowding and empty homes in the Local Plan and rely on the Council's housing strategy and related delivery strategies only.	This matter is considered a housing priority for the council which requires its own policy response to support the housing strategy
EN1	EN1RA1	The first alternative is to have no specific policy on Green Infrastructure standards	Having no policy on Green Infrastructure standards would limit the Council's ability to ensure that good levels of Green Infrastructure are provided as part of new developments. It would also reduce the plan's compliance with the NPPF which requires plans to enable and support healthy lifestyles through the provision of safe and accessible green infrastructure.
	EN1RA2	The second alternative is to incorporate the standards into the Strategic Green Infrastructure policy (SP10)	Incorporating the standards into to the strategic policy on Green Infrastructure may help to provide a comprehensive approach, but equally a separate policy on the standards would give greater scope to provide additional detail that is not appropriate in a strategic policy.
	EN1RA3	The third alternative is to rely on the open space standards referred to in Policy CO1 to ensure provision of greenspace as part of new developments.	Although the requirements in Policy CO1 would help to ensure the provision of new open space (an important Green Infrastructure component), separate Green Infrastructure standards would cater for a wider range of interventions not covered by traditional open space provision, such as green roofs, green walls, street trees etc. Relying on Policy CO1 would limit the opportunities to maintain and enhance the Green Infrastructure network.
EN2	EN2RA1	The first alternative is to cover the topic through two linked policies.	The updated policy approach condenses detail and integrates within a single policy format which presents a more succinct and easier to understand approach.
	EN2RA2	The second alternative is for the policy content to be reduced further and reference made to supporting tables within reasoned justification	In a complex policy area this approach can cause confusion over what is specific policy and what issues are more for wider consideration or supportive of policy
EN3	EN3RA1	Update the policy but include a narrow range of policy considerations or reduced range of changes	The policy as drafted presents a focused succinct approach to the policy topic.
EN4	-	No alternatives considered	The policy is considered comprehensive in scale and no reasonable alternatives have been considered.
EN5	-	No alternatives considered	The policy is succinct and grounded in the evidence base and SPD work and no reasonable alternatives have been

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
			considered.
EN6	EN6RA1	The first alternative was to have no policy	This would leave some part of the district and countryside potentially unprotected.
	EN6RA2	The second alternative was to integrate the policy focus within the landscape or other policy area	This alternative could result in the specific policy interest not being effectively represented.
EN7	-	No reasonable alternative identified	The policy is strengthened relating to Surface Water runoff, SuDS and Natural Flood Management. The policy has been updated to reflect new SFRA and other flood risk management strategies. However, with a number of new river models being prepared by the Environment Agency, the SFRA will require a further update and consequentially the policy may require further changes.
EN8	EN8RA1	Reducing the threshold from major developments to all developments in relation to air quality requirements and assessment	This is subject to further questioning as part of this consultation.
	EN8RA2	Increasing threshold to developments of 50 units and over for residential and similar threshold setting for non-residential	This would exclude a significant proportion of the District's historic housing supply and potentially lead to a more ineffective policy.
	EN8RA3	Keeping policy detail within the wider environmental policy context	The increasingly specific and technical nature of the policy justifies separate detailing.
EN9	EN9RA1	The alternative is for no change to the previous iteration of the policy.	This would see the retention of the air quality section, explicit references to soils not being included, and less clarity on achieving the Water Framework Directive objectives.
	EN9RA2	The second alternative is to include a separate policy on the Water Environment.	This would provide a stronger, separate focus on water quality and resource issues; however, it would reduce the comprehensive nature of this environmental protection policy which considers pollution and contamination issues as a whole.
EN10	EN10RA1	Expand Policy SP9 and further integrate energy detail	Strategic policy provides the wider context to the more development management orientated focus within EN10 – although it does also include an allocation element to the lower order policy
	EN10RA2	Reduce policy coverage and make minor adjustments to Core Strategy Partial Review drafting	There has been a significant move forward in relation to tackling climate change and energy related issues since the policy was first drafted.
	EN10RA3	Set out a series of broad areas of search for the development of strategic scale energy projects	This is subject to a call for sites.
	EN10RA4	Provide a different range of standards within policy	This is subject to further questioning as part of this consultation.
EN11	-	No reasonable alternative considered	Policy approach has not been amended
EN12	EN12RA1	Do not include specific site allocations/policy	National planning policy requires those authorities maintaining a steady and adequate supply of minerals. The policy will also ensure the impacts of mineral extraction on the wider environment are given due consideration by developers and decision makers and provides a clear framework for developers and decision makers that should be considered when dealing with proposals for mineral extraction. The no policy option is not considered a reasonable alternative.
EN13	-	No reasonable alternative considered	It is not proposed to amend the policy approach. It remains broadly in line with national policy.
EN14	-	Do not define Areas of Search	It is not proposed to amend the overall policy approach as set out in adopted policies EN10(E) and EN11(E), as such this not considered to be reasonable alternative.
EN15	EN15RA1	Retain the existing policy EN9 as drafted	This would mean the policy wording is maintained as currently drafted with limited updates to wording and

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives
			reasoned justification.
EN16	-	No reasonable alternative considered	National policy requires Mineral Planning Authorities set out a planning policy framework to support the reclamation of mineral workings at the earliest opportunity and deliver high quality restoration and aftercare of sites.
EN17	EN17RA1	The alternative is to have no specific policy	This would not be consistent with national planning policy, which requires Mineral Planning Authorities to include a policy framework within their Local Plans for hydrocarbon (oil and gas) and coal extraction
	EN17RA2	The second alternative is to retain the existing policy as drafted	This would result in the policy framework for hydrocarbon (oil and gas) and coal extraction being included alongside other mineral rather than separately.
EN18	EN18RA1	Retain existing policies W4 to W7, WDM1, WDM2 and WDM7 as set out in the Waste Management DPD	This would result in some minor amendments to the policies and reasoned justification to reflect any changes in the wider national policy context since they were adopted in 2017. However, it would result policy repetition.
EN19	EN19RA1	Do not identify specific waste managements and rely on criteria-based policies to assess proposals on a site-by-site basis.	It is considered appropriate to ensure that the Local Plan allocates sufficient sites to meet requirements for the sustainable management of waste.
EN20	-	No reasonable alternative considered	No other reasonable alternative considered as the policy has not been amended
EN21	-	No reasonable alternative considered	No other reasonable alternative considered as the policy has not been amended
CO1	CO1RA1	Separate policy components into a range of individual policies, possibly splitting between open space protection and requirements	The policy as drafted presents a focused succinct approach to the policy topic.
CO2	CO2RA1	Do not include a policy	National policy requires Local Plans to ensure that they are planning positively for community infrastructure as part of creating healthy and safe communities as well as avoid their un-necessary loss.
	CO2RA2	Include separate policies to address specific community infrastructure types	The single policy approach is simple to understand and provides quick access to material.
CO3	CO3RA1	The first alternative is to set a specific dwelling and commercial threshold for health impact assessments	The major development threshold is already established and used for applications
	CO3RA2	Excluding hot food takeaways from the policy	Taking positive action to change the food environment within the District is part of public health policy
	CO3RA3	Integrate the policy within SP15 strategic policy	The requirements of HIAs are quite specific and better suited to a development management policy structure.
DS1	DS1RA1	The first alternative is to not update the policy	This would still provide a level of policy support for the SPD Homes and Neighbourhoods: a guide to designing in Bradford but not as comprehensively.
	DS1RA2	The second alternative is to Consider a more extensive rewrite of the design policies to more closely follow the structure set out in Homes and Neighbourhoods: a guide to designing in Bradford	This could allow for easy cross-reference between the two documents, but it would likely overlap with other related policy areas and require a wider rethink of the overall structure of the plan.
DS2	DS2RA1	The first alternative is to not update the policy.	This would still provide a level of policy support for the SPD Homes and Neighbourhoods: a guide to designing in Bradford but not as comprehensively.
	DS2RA2	Consider a more extensive rewrite of the design policies to more closely follow the structure set out in Homes and Neighbourhoods: a guide to designing in Bradford	This could allow for easy cross-reference between the two documents, but it would likely overlap with other related policy areas and require a wider rethink of the overall structure of the plan.
DS3	DS3RA1	The first alternative is to not update the policy.	This would still provide a level of policy support for the SPD Homes and Neighbourhoods: a guide to designing in Bradford but not as comprehensively.

Preferred option	Reasonable alternatives	Description of alternative	Justification for rejecting reasonable alternatives	
	DS3RA2	Consider a more extensive rewrite of the design policies to more closely follow the structure set out in Homes and Neighbourhoods: a guide to designing in Bradford	This could allow for easy cross-reference between the two documents, but it would likely overlap with other related policy areas and require a wider rethink of the overall structure of the plan.	
DS4	DS4RA1	The first alternative is to not update the policy.	This would still provide a level of policy support for the SPD Homes and Neighbourhoods: a guide to designing in Bradford but not as comprehensively.	
	DS4RA2	Consider a more extensive rewrite of the design policies to more closely follow the structure set out in Homes and Neighbourhoods: a guide to designing in Bradford	This could allow for easy cross-reference between the two documents, but it would likely overlap with other related policy areas and require a wider rethink of the overall structure of the plan.	
DS5	DS5RA1	The first alternative is to not update the policy.	This would still provide a level of policy support for the SPD Homes and Neighbourhoods: a guide to designing in Bradford but not as comprehensively.	
	DS5RA2	Consider a more extensive rewrite of the design policies to more closely follow the structure set out in Homes and Neighbourhoods: a guide to designing in Bradford	This could allow for easy cross-reference between the two documents, but it would likely overlap with other related policy areas and require a wider rethink of the overall structure of the plan.	
ID1	ID1RA1	Do not include a policy	National policy requires Local Plans to plan for future infrastructure needs and put in place the necessary for securing future provision or contributions towards it.	
	ID1RA2	Split the policy into specific topic items.	The single policy approach is simple to understand and provides quick access to material	
		ID1RA3	Set an alternative standard for Non-Next Generation Access Technologies	Standard level has been set in light of technical advice.
ID2	-	No alternative considered	The policy has been subject to a minor factual update to the reflect the adopted of the Community Infrastructure Levy (CIL) charging schedule in July 2017.	
ID3	-	No alternative considered	The policy seeks to ensure consistency with national planning policy.	

5.2.1 Summary of effects

Overall, policies proposed in the Local Plan are in line with the SA Objectives. Policies SP1 –SP16 aim to set out the District’s key principles and ensure a consistent approach across developments over the course of the Plan period. Policies SP1, SP8 and SP9-16 ensure that the Council supports the achievement of sustainable developments and improvements to environmental conditions, resulting in improvements to energy efficiency and an overall reduction in GHG emissions. Policies SP6, SP8 and SP12 would see the most negative impacts associated with development and GHG emissions, and they aim to prioritise urban expansion and economic growth over the environment. SP2 and SP9 each would have a significantly positive impact on Objectives associated with protecting the District’s green spaces and reaching biodiversity targets. Policies SP1 –SP16 each aim to increase the access of residents to services and facilities throughout the District, by expanding sustainable transport networks without compromising good design and opportunities for economic growth.

Transport Policies TR1 – TR5 favour the expansion of the public transport system, prioritizing the regeneration of existing infrastructure and thus achieving SA Objectives for Air Quality, Emissions & GHGs, Land & Buildings and significantly having a positive impact on the Transport SA Objective. Each policy aims to address the needs of the District and provide the most suitable infrastructure or each area. Policy TR6 encourages the use of freight for haulage, going further to minimize GHGs and emissions and aiming to reduce congestion on Bradford’s road network. This policy additionally would boost employment in the Region, as speeding up the haulage network would be greatly beneficial to the economy. Overall, policies TR1 – TR7 facilitate the movement of the population, increasing the reach of job opportunities and leisure facilities. These policies would have no impact on the Water Resources Objective.

Policies EC1 – EC4 are focused on improving and expanding economic opportunities throughout Bradford. They therefore score well and would have a major beneficial impact on Employment and Economy SA Objectives, and additionally would increase the availability of education in the District, by providing opportunities to develop new skills. EC4 would seek to enhance the viability of the City Region, and each policy further facilitates Social Cohesion by reducing degradation and deprivation within the District. These policies would have a minor negative impact on the Cultural Heritage and Landscape and Townscape Objectives, as encouraging the expansion of employment sites may influence the character of the District and may affect views around Saltaire World Heritage Site.

Housing policies HO1-HO10 support the delivery of housing growth in the District, and therefore all score positively on the Housing SA Objective. Policies HO2 and HO3 focus developments on urban sites and therefore seek to minimize the amount of land required to provide new housing for residents of the District. Higher density housing would further minimize this impact and may have a less significant impact on SA Objectives for Landscape and Townscape and Cultural Heritage. These policies may increase the number of private vehicles used throughout the District, thus having a negative impact on SA Objectives for Air Quality if the increase in housing is not accompanied by expansion of sustainable travel networks to support the uptake of public transport.

Environmental policies EN1-EN21 have varied impacts upon each SA Objective. Policies EN1- EN10 aim to protect the natural landscape of the District. EN3 and EN4 have provisions for the protection of trees and woodlands and the historic environment, thereby positively influencing the Air Quality and Biodiversity and Geodiversity Impacts. By encouraging the expansion of Green linfastructure, Water Resources are protected and improved, and the District is made more resilient to climate change by the provision of flood storage and permeable surfaces. Similarly, CO1 and CO2 would have the same impact. Policies EN11-EN17 support the expansion of mineral extraction sites, therefore potentially negatively impacting these same objectives. These policies are likely to increase waste generated in the District, negatively impact the landscape and impact air quality in the District but have negligible impact on Social Cohesion and Culture and Leisure Objectives. Policies EN11 – EN17 would have a positive impact on the Education, Employment and Economy Objectives, as they are likely to create jobs and provide on-the-job education. It is possible that the effects of these policies will be short lived, due to the finite nature of the materials extracted. Polices EN18-EN21 would have a negligible impact on many of the SA Objectives, but as they advocate for the safeguarding of waste facilities and management, they would have a significantly positive impact on the Waste SA Objective. Policies CO1 - CO3 would have a major positive impact on the health of the District, by providing open spaces for recreation and ensuring health is protected through Health Impact Assessments.

Policies DS1 – DS5 aim to ensure the high-quality design of new developments in the District. Each of these policies supports the growth of the District, using the design of the development and working with the landscape to minimize the impacts of the development on the setting of the District. These policies support economic growth, and like policies ID1 – ID3, ensure developments are economically viable and deliverable, therefore achieving a positive impact on Economic and Employment Objectives. These policies will encourage good design that will minimize crime and allow residents to feel safe in their communities, as all policy options encourage social cohesion and have a positive impact on these Objectives. The policies aim to ensure the provision of new facilities are appropriate for purpose and increasingly accessible, thus having overall positive impacts on the SA Objectives for Accessibility of Services and Culture and Leisure.

5.2.2 Mitigating effects through other Local Plan policies

Policies proposed in the Local Plan would be likely to help mitigate the potential negative effects of other policies, as well as to enhance the positive effects. The above summary and the scores presented in **Table 5-5** do not take this into consideration, as they are a summary of the predicted effects of policies considered in isolation. **Table 5-6** provides an overview of the policies that would be likely to help avoid, mitigate or enhance effects for each SA Objective. These are then factored into the cumulative effects assessment in the **Chapter 8**.

Table 5-5: Summary of appraisals of preferred options for policies (full results in Appendix D)

Major negative		Minor negative		Neutral / negligible		Positive & negative		Uncertain		Minor positive		Major positive							
--		-		0		+/-		?		+		++							
Options	SA Objectives																		
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
Development Strategy																			
SP1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
SP2	+/-	-	-	++	-	++	++	-	-	+/-	++	++	++	++	++	++	++	++	++
SP3	+	0	0	+	0	++	++	++	++	++	++	+	++	++	++	+	++	++	++
SP4	+	+	+/-	-	+/-	+/-	+/-	+/-	++	++	+	+/-	+/-	+/-	+	+	+	+	+
SP5	-	0	-	-	-	-	-	-	-	-	++	-	+	-	0	+/-	-	+	++
Planning for Prosperity																			
SP6	--	-	-	?	-	-	-	-	-	+/-	+	+	+	+	0	+	+	++	++
SP7	--	-	-	0	0	0	+	+	++	++	0	++	++	++	+	+	+	+	+
Planning for Homes																			
SP8	-	+/-	-	-	+/-	-	+/-	+/-	--	-	++	+	+/-	+/-	+/-	+	+	++	++
Planning for Place and Community																			
SP9	++	+	++	++	++	++	+	+	++	++	+	+	++	+	+	+	+	+	+
SP10	+	0	+	+	+	++	++	+	+	0	0	+	+	+	+	0	0	+	0
SP11	+	0	+	+	+	++	++	+	+	0	0	0	+	+	0	0	0	0	0
SP12	--	-	--	-	--	--	--	+	--	-	-	0	+	0	-	+	+	+	+
SP13	-	++	-	-	-	-	-	-	-	+/-	0	0	0	-	-	0	0	+	+
SP14	++	+	+	+	+	+	++	++	++	++	++	++	++	++	+	+	+	+	+
SP15	+	+	+	++	+	+	++	++	++	++	++	++	++	++	++	+	+	++	++
SP16	+	0	0	+	0	+	+	+	+	+	+	++	++	+	+	+	+	++	++
Thematic policies: Planning for Prosperity																			
EC1	--	--	--	?	-	--	-	-	-	+/-	+	+	+	+	0	++	+	++	++
EC2	-	-	-	?	-	-	-	-	-	+/-	+	+	+	+	0	+	+	++	++
EC3	-	-	-	0	-	-	-	-	-	-	+	+	+	+	0	++	++	++	++
EC4	-	-	-	?	-	-	+	+	+	+/-	+	++	++	++	0	+	+	++	++

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Options	SA Objectives																		
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
TR1	+	+	+	0	0	0	+	+	++	++	0	++	++	++	+	+	+	+	++
TR2	++	0	0	0	0	++	++	++	++	++	0	++	++	+	+	+	++	+	+
TR3	+	0	0	0	0	0	+	+	+	++	0	++	++	++	+	+	+	+	++
TR4	+	0	0	0	0	+/-	-	++	+	++	0	++	++	++	+	+	+	++	++
TR5	+	0	0	0	0	0	+	+	+	+	0	+	+	+	++	++	0	0	+
TR6	-	0	0	0	0	-	-	-	-	+	0	0	0	0	++	++	-	++	++
TR7	-	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	0	0	+
Thematic policies: Planning for Homes																			
HO1	-	-	-	-	-	-	+/-	+/-	+/-	+/-	++	+/-	+	+	+	+	+	++	+
HO2	+	+	+	+	+/-	+	+/-	+/-	+/-	+/-	++	+	+	+	0	+/-	+	++	+
HO3	+	+	+	+	+	+	+	+/-	+/-	++	++	+	+	+	0	+/-	+	++	+
HO4	0	0	-	0	0	-	+/-	+/-	+/-	0	++	+/-	+	+	0	+	+	++	+
HO5	0	0	-	0	0	-	+/-	+/-	+/-	0	++	+/-	+	+	0	+	+	++	++
HO6	0	0	-	-	0	-	-	+/-	+/-	0	++	+/-	+	+	0	+	+	++	+
HO7	0	0	-	0	0	-	+/-	+/-	+	0	++	+	+	+	0	++	0	++	+
HO8	0	0	0	-	0	0	+/-	+/-	+/-	0	++	+	+	+	+	+	0	++	+
HO9	+	+	0	0	+	-	+/-	+/-	+/-	0	++	+	+	+	+	+	+	0	0
HO10	+	+	++	+	+	-	+	+/-	+/-	0	++	+/-	+	+	0	+	+	0	0
Thematic policies: Planning for Places and Communities																			
CO1	+	0	0	+	+	++	++	++	++	0	+	++	+	++	0	++	0	+	+
CO2	-	-	0	0	-	-	0	0	0	0	0	++	+	+	0	++	+	+	0
CO3	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	++	0	0	0
EN1	+	0	0	+	0	++	+	++	+	0	0	0	+	+	0	+	0	0	0
EN2	+	0	+	+	+	++	++	+	+	0	0	++	+	+	0	+	0	+	+
EN3	+	0	+	++	+	++	++	++	++	0	0	+	++	++	0	+	0	0	+
EN4	0	0	0	0	0	+	++	++	0	0	0	++	+	++	0	0	0	+	+
EN5	+	0	+	0	+	++	++	++	0	0	0	+	+	+	0	++	0	0	+
EN6	+	0	+	+	++	++	++	+	++	0	0	+	+	++	0	++	0	+	0
EN7	0	0	+	++	++	+	+	0	+	0	0	0	0	0	0	+	0	0	+

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Options	SA Objectives																		
	1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
EN8	+	0	0	+	0	+	0	0	++	+	0	0	0	0	+	++	0	0	0
EN9	++	0	0	0	++	++	+	+	0	0	0	0	0	+	0	+	0	0	+
EN10	++	0	0	++	0	0	0	0	+	0	0	0	0	0	0	0	0	+	+
EN11	-	+/-	:-	0	:-	:-	:-	+	-	-	+	0	+	0	0	-	+	+	+
EN12	:-	-	:-	0	:-	:-	:-	+	-	-	+	0	+	0	0	-	0	+	+
EN13	:-	-	:-	0	:-	:-	:-	+	:-	-	-	0	+	0	0	-	0	+	+
EN14	:-	-	:-	0	:-	:-	:-	0	-	-	-	0	+	0	0	-	0	+	+
EN15	-	-	:-	0	:-	:-	:-	0	-	-	-	0	+	0	0	-	0	+	+
EN16	-	-	:-	0	:-	:-	:-	0	-	-	-	0	+	0	0	-	0	+	+
EN17	-	-	:-	0	:-	:-	:-	0	-	-	-	0	+	0	0	-	0	+	+
EN18	+	++	+	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0
EN19	0	++	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0
EN20	0	++	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0
EN21	++	++	0	0	++	0	-	0	+/-	0	0	0	0	0	0	++	0	0	0
DS1	0	+	+	0	0	0	+	+	0	0	++	0	0	0	0	0	0	0	0
DS2	+	0	0	++	++	++	++	+	++	0	0	0	++	+	0	+	0	0	+
DS3	0	0	+	0	0	0	++	+	0	0	0	0	0	0	0	0	0	0	0
DS4	+	0	0	++	0	0	0	0	++	++	0	0	0	0	+	+	0	0	0
DS5	0	+	0	0	0	0	0	0	0	0	0	+	++	+	++	++	0	0	+
Implementation, Delivery and Monitoring Policies																			
ID1	-	-	-	-	0	-	+/-	+	0	0	0	+	+	0	0	+	++	+	+
ID2	-	-	-	-	0	0	+/-	0	0	+	0	+	0	0	0	+	0	+	+
ID3	-	-	-	-	0	0	+/-	0	0	0	0	+	0	0	0	0	0	+	++

Table 5-6: Preferred option policies in the Local Plan that would be likely to help avoid, mitigate or enhance predicted effects when assessing other preferred policies and sites (Appendices D, E and F), for each SA Objective

SA Objective	Mitigating Policies
1. Energy and GHGs	<p>Policy SP9 and SP10 would support the use of renewable and low carbon energy in the District which would reduce the energy consumption and GHG emissions from traditional energy sources. SP9 would also set ambitious carbon reduction targets.</p> <p>Policies SP3, SP4, SP7, SP9, SP16, TR1, TR2, TR3, TR4, TR5 and DS4 would support the provision and uptake of sustainable and active travel opportunities in the District which would contribute to reducing vehicular GHG emissions.</p> <p>SP7 and TR1 would reduce travel need + travel times, reducing vehicular GHG emissions.</p> <p>Policies SP10, SP11, SP14, SP15, CO1, EN1, EN2, EN5, EN6, EN3 and DS2 would protect and enhance GI and greenspaces within the District which would ensure the protecting and growth of the District's carbon sink.</p> <p>Policy EN8 and EN12 would use sustainable and energy efficient designs + construction methods to minimise pollutants and GHGs.</p> <p>Policy EN9 would require development to mitigate and offset emissions and impacts in accordance with the Low Emission Strategy for Bradford.</p> <p>Policy EN18 would aim to be energy and heat efficient + 'BREEAM' excellent.</p>
2. Waste	<p>Policies SP4 and SP9 would support the reuse of PDL and existing housing stock which would reduce waste produced through construction.</p> <p>Policies EN18, EN19, EN20 and EN21 would provide the appropriate waste management facilities only when no alternative, ensuring there is adequate facilities but minimising landfill and encouraging use of secondary materials.</p> <p>Policy TR1 prioritises the enhancement of existing infrastructure before developing new infrastructure, reducing waste through efficient resource use.</p> <p>DS1 would encourage efficient design and use of materials and reduce material consumption and waste generation.</p>
3. Land & Buildings	<p>Policies SP2 and HO10 would support the reuse of PDL and existing housing stock which would reduce waste produced through construction. HO6 also gives priority to the re-use of PDL and buildings and sets targets for delivery on PDL.</p> <p>Policies SC6, EN1, EN2, EN1 and EN9 would protect and enhance greenspaces in the district.</p> <p>HO2 and HO3 seeks to maximise densities and so could reduce the need for land.</p> <p>HO1 encourages site allocations that reclaim derelict land.</p>
4. Climate Change Resilience	<p>Policies EN7 would seek to reduce and manage flood risk in the District.</p> <p>Policies SP1 and SP9 would require development proposals to include measures that would mitigate the effects of climate change.</p> <p>Policies SP1, SP5, SP10, SC8, EN1, EN2 and EN5 would protect and enhance greenspaces and habitats within the District which would preserve vegetation and permeable soils which would contribute to sustainable flood risk management.</p> <p>HO1 encourages site allocations that minimise negative impacts on flood risk.</p> <p>Policy EN7 would increase flood storage, implement SUDs and GI within developments, and actively manage flood risk.</p>
5. Water	<p>Policy SP1 would ensure new developments use water resources sustainably, minimising consumption</p>

SA Objective	Mitigating Policies
resources	<p>and maximising water recycling.</p> <p>EN7 would seek to minimise run off from developments and enhance the ecological value of beck corridors, and would safeguard ground and surface water quality, with the aim to improve ecological status of water in Bradford.</p>
6. Biodiversity & Geodiversity	<p>Policies SP1, SP5, SP10, SP11 and EN1-EN9 would seek to protect, enhance and develop greenspaces and sensitive habitats within the District.</p> <p>Policies SP3, DS1, DS2 and DS3 would ensure the inclusion of green infrastructure in the design of development.</p> <p>HO1 encourages site allocations that create opportunities for enhancing GI and minimise negative impacts on biodiversity, as well as maximising opportunities for enhancing biodiversity.</p>
7. Landscape & Townscape	<p>Policies SP1, SP5 and EN1- EN9 would protect, enhance and develop the landscapes and character in the District.</p> <p>Policies SP3 and DS1-DS5 would ensure the high-quality design of developments that would protect, complement and enhance the character of surrounding areas.</p> <p>Policies CO1 and EC4 would seek to develop a strong sense of place and a high-quality public realm in the District.</p> <p>HO3 and HO4 encourage site allocations that relate well to the form and character of the settlement and do not detract from setting.</p>
8. Cultural Heritage	<p>Policies SP2 and EN3 - EN6 would protect and enhance the District's historic character.</p> <p>Policies SP14, SP15 and DS1-DS5 would ensure the high-quality design of developments that would protect, complement and enhance the character and historic setting of the District.</p> <p>HO7 encourages site allocations that relate well to the form and character of the settlement and do not detract from setting.</p> <p>Policy TR4 would improve accessibility of visitor attractions including heritage assets and support the development and maintenance of attractions, such as heritage railways.</p> <p>Policies HO3 and HO4 would help to ensure that new housing is in-keeping with the existing build form in the surrounding area in order to protect local character and setting.</p>
9. Air Quality	<p>Policy EN10 would support the use of renewable and low carbon energy in the District which would reduce the air pollution from traditional energy sources.</p> <p>HO1 and HO3 encourages site allocations that reduce the need to travel and are accessible via quality public transport services.</p> <p>Policy EN8 would ensure the proactive management of air quality.</p> <p>Policies SP1, SP2, SP4, SP5, SP7, SP15, TR1, TR2, TR3, TR4, TR5, TR6, and DS4, would support the provision and uptake of sustainable and active travel opportunities in the District which would contribute to reducing vehicular air pollution.</p>
10. Transport	<p>Policies SP1, SP2, SP4, SP5, SP7, SP15, TR1, TR2, TR3, TR4, TR5, TR6, EN8 and DS4 would support the provision and uptake of sustainable and active travel opportunities in the District.</p> <p>HO2 seeks to maximise densities and so could help to reduce the need to travel.</p> <p>HO2 and HO3 encourage site allocations that reduce the need to travel and are accessible via quality public transport services.</p> <p>Policies TR1-3 would facilitate a more efficient and integrated transport system in the District.</p>
11. Housing	<p>Policy SP8 would manage the delivery of housing to meet the District's needs.</p>

SA Objective	Mitigating Policies
	<p>Policies HO1 to HO9 would ensure the delivery of a wide range of housing that would meet the District’s growing and diverse housing needs including the need for affordable homes.</p> <p>Policy HO5 and ID2 would ensure that local affordable housing needs are met across the district.</p>
12. Accessible Services	<p>Policies SP2 and CO2 would support the delivery of housing and community services and facilities.</p> <p>Policies SP3, HO4, HO9, EN1, EN2 and CO1 would enhance outdoor recreational and leisure spaces within the District.</p> <p>Policies SP3, SP14, SP15 and EN1 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>SP9, HO1, HO7 and CO2 encourage site allocations that are accessible to a range of services and community facilities.</p> <p>Policies EC4 and CO2 would provide new and improved community services and leisure facilities in accessible locations in Bradford.</p> <p>Policies TR1, TR2, TR3, and TR4 would facilitate a more efficient and integrated transport system that would enhance accessibility of services.</p>
13. Social Cohesion	<p>DS5 and CO2 would ensure that developments were designed to accommodate all accessibilities.</p> <p>Policies SP7, SP10 and SP15 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>HO3 encourage site allocations that are accessible to a range of services and community facilities.</p> <p>Policies EN1, EN2 and CO1 would enhance outdoor recreational and leisure spaces within the District which would support community interaction and social cohesion.</p> <p>TR1, TR3, and TR5 would enhance walking and cycling options which would facilitate greater social interaction.</p> <p>HO1, HO5 and HO7 would help to ensure that affordable housing needs are met and this would be likely to benefit social cohesion.</p> <p>Policy HO9 would ensure the delivery of high-quality housing that would enable safe spaces for socialisation and support community cohesion.</p>
14. Culture & Leisure	<p>Policies SP7, SP10 and SP15 would seek to provide well connected networks for movement and multifunctional green spaces.</p> <p>Policies SP1, EN6, CO1 and CO2 would enhance outdoor recreational and leisure spaces within the District.</p> <p>HO1 encourages site allocations that are accessible to a range of services and community facilities.</p> <p>SP3, EC4 and CO1 would provide new and improved cultural and leisure places and activities in accessible locations in Bradford.</p> <p>Policies TR1, TR2, TR3 and DS4 would facilitate a more efficient and integrated transport system that would enhance accessibility of services as well as leisure & cultural areas.</p> <p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities.</p>
15. Safe & Secure	<p>Policy SP2 and DS5 would ensure that developments are of high quality and well-designed and support social, economic and environmental improvements in the District to promote a sense of safety and security.</p> <p>Policies DS5 would seek to transform the District’s settlements into cohesive, inclusive spaces.</p> <p>Policy SP14 would require developments to be designed in a way that makes spaces safe, inclusive and welcoming.</p>

SA Objective	Mitigating Policies
	<p>EN9 encourages site allocations that avoid posing unacceptable risks to health and safety.</p> <p>Policies HO1-HO7 and HO9 would ensure local housing needs were met and that developments are of a high quality so to support safe and secure lives at home.</p> <p>Policy TR5 would ensure that new parking facilities are designed to be safe and secure for people and property.</p>
16. Health	<p>CO3 and SP15 would ensure that developments contribute to the delivery of better health outcomes and contributes to a reduction in health inequalities.</p> <p>SP1, SP10, SP15 and EN1 would enhance and preserve the District’s green spaces which encourage physical activity and improved physical and mental well-being.</p> <p>HO1 would help to ensure that housing needs in the District are satisfied and as such would make a major contribution towards ensuring people can live healthy and secure lives at home.</p> <p>EN9 encourages site allocations that avoid posing unacceptable risks to health and safety.</p> <p>SP6 and EC1- EC4 would improve access to a range of high-quality employment opportunities which would reduce deprivation and contribute to improvements in mental health and well-being.</p> <p>Policies TR1, TR2 and TR3 would increase active travel opportunities which would have the potential to lead to improved physical and mental wellbeing through increased physical activity.</p>
17. Education	<p>Policies EC1 to EC3 would seek to achieve a wide range of employment opportunities in the District which would provide opportunities for training.</p> <p>Policies EC3 and CO2 would provide a major boost to local education and skills learning through apprenticeships and higher education opportunities and the provision of new education facilities.</p>
18. Employment	<p>Policies SP6 and EC1 to EC3 would seek to achieve a wide range of employment opportunities in the District.</p> <p>Policy EC3 would require proposals to support the delivery of jobs and key services which would lead to local employment opportunities. These policies would ensure that job requirements stratified local needs and requirements.</p> <p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities which would increase employment opportunities and revenue in the tourism sector.</p> <p>Policy TR6 would support the development of Bradford’s freight industry which would lead to increase employment opportunities and revenue in the freight sector.</p> <p>Policies SP8 and HO1-10 would support the delivery of housing growth which would generate a significant number of employment opportunities within the construction sector and provide a boost to the local economy.</p> <p>Policies EN15-17 would require the extraction of minerals and hydrocarbons and support local employment opportunities.</p>
19. Economy	<p>Policy SP6 would seek to achieve a wide range of employment opportunities in the District which would provide a boost to the local economy.</p> <p>Policy ID2 would seek to support economic growth and ensure developments are economically viable before planning permission is given.</p> <p>EC1- EC4 would increase employment opportunities and ensure a sustainable boost to the local economy through supporting the regions focus on research, design, logistics, storage and distribution as well as enterprise and new start-ups.</p> <p>Policies HO1-10 would support the delivery of housing growth which would generate a significant number of employment opportunities within the construction sector and provide a boost to the local economy. Each of these policies would help to ensure that Bradford’s housing needs can be met and would therefore enable the local economy to continue to grow and compete.</p>

SA Objective	Mitigating Policies
	<p>Policy TR4 would improve access to tourist sites and support the development of transport-based tourist facilities which would increase revenue from the tourism sector.</p> <p>Policy TR6 would support the development of Bradford’s freight industry which would lead to increase employment opportunities and revenue in the freight sector.</p> <p>Policies EN15-17 would require the extraction of minerals and hydrocarbons and support local employment opportunities.</p>

6 Strategic Urban Extensions

6.1 B2: SUEs

6.1.1 Introduction

The emerging Local Plan proposes a range of strategic and thematic policies that will guide future development in the District. Arriving at the options considered for the Local Plan has been an iterative process developed over a number of years including the work undertaken for the now Adopted Core Strategy (2017).

The development of the Adopted Core Strategy 2017 involved the identification of options for strategic locations for development. This included an Issues and Options paper in 2008, which focused specifically on the spatial vision, strategic objectives and spatial options for the location of development. These options and the eventual preferred spatial strategy option were subject to Sustainability Appraisal (SA) at the time, as explained in Chapter 5. Policy SC4 within the adopted Core Strategy sets out the settlement hierarchy for the District and Policy HO3 specifically refers to the distribution of housing development.

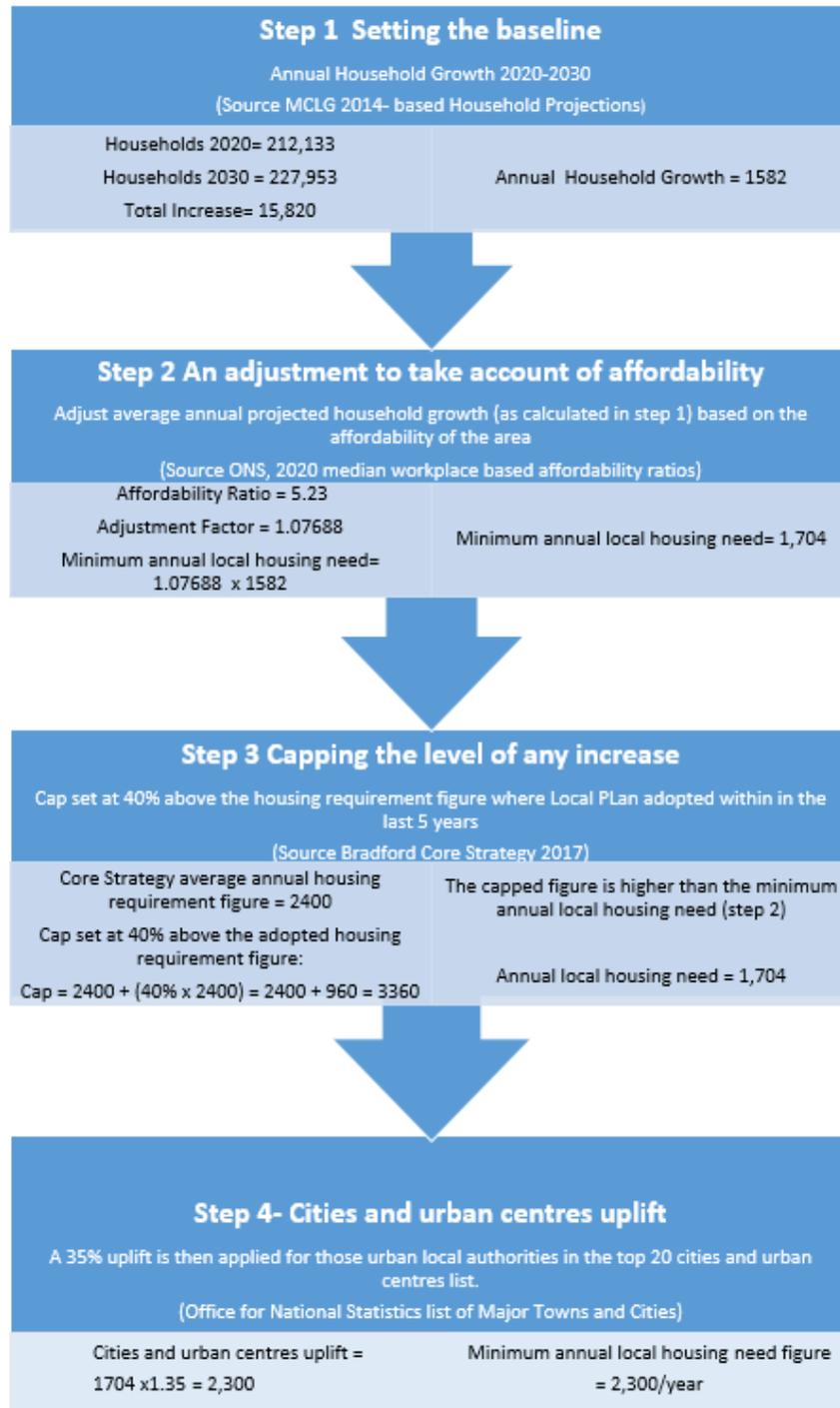
6.1.2 Core Strategy Partial Review

Following the Adoption of the Core Strategy in 2017, the advice from Government changed the approach to how housing need is calculated in England using a 'Standard Method'. For the District, using this new 'Standard Method' provides a new minimum figure of 1,704 net dwellings per annum over a 17-year plan period (before adjustments for housing losses and windfalls) instead of the 2,476 dwellings proposed in the Adopted Core Strategy.

With the reduced overall housing requirement comes an updated distribution of growth where all settlements will see a reduction in absolute housing targets with the exception of Bradford City Centre (up from 3,500 to 4,000). This follows the principle of urban concentration and focus on previously developed land (PDL) proposed in the Adopted Core Strategy.

Following publication of the Core Strategy Partial Review (CSPR), the Government has made a further change to the Standard Method for calculating housing need set out below in Figure 6-1.

Figure 6-1: Standard Method for calculating housing need



A series of studies has helped identify potential site allocations, strategic sites and areas of search in the District, building on the work undertaken for the Adopted Core Strategy and focussing primarily on PDL. However, the housing requirement of 1,704 per annum for the plan cannot be met in full through PDL and non-Green Belt sites. Therefore, the Council is looking at a series of sustainable urban extensions (SUEs) as possible options to supply larger numbers of housing in a sustainable manner and supported with new infrastructure and services. This approach aligns with NPPF paragraph 72:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities”. (NPPF 2019 para 72)

This chapter provides an assessment (following the SA approach for the wider Local Plan) of six SUE options as shown in **Table 6-1**.

Table 6-1: Strategic urban extension options

Potential SUE	Net Developable Area (ha)	Potential Dwellings
Allerton	6.61	350
Clayton Heights	11.68	409
West of Cross Hill	13.1	461
Holme Wood	65.36	1,454
South Bierley	12.13	425
Thackley	15.75	551

6.1.3 Development of SA of SUE options

In 2019, an initial SA of five potential SUE options was undertaken. This included: Allerton, Clayton Heights, South Bierley, Holme Wood and West of Cross Hill. This initial appraisal was high level and considered the potential for the whole site areas to be developed, as a worst-case scenario. All five sites were large-scale, greenfield sites with a number of common characteristics. Consequently, given the assumptions in the SA and the level of detail of the appraisal it was sometimes hard to find clear sustainability differentiators between the sites.

Further, development of the options ensued throughout 2020 including the addition of a further SUE option at Thackley. Further information was provided regarding the most likely areas within the site boundaries for development, together with parameters for development including, for example, likely service provision and potential for mixed-use elements. The SA of these now six options has been updated with additional detail and comparative assessment text. Furthermore, some of the criteria used within the SA Framework Objectives were reviewed to help differentiate between different scales of development. It is this analysis that is presented in this Chapter.

It should be noted that, the SUEs were appraised on an individual basis in order to assist the development of options. It is quite feasible that at the next stage of Local Plan development (Regulation 19) further iterations of the SA will be undertaken which could look at combinations of whole or partial SUE options being taken forward. This process forms an important aspect of the appraisal of reasonable alternatives required by the SEA Regulations. It will also be important to consider the role of the chosen option or options within the wider context of the District-wide spatial strategy.

Each SUE reasonable alternative has been assessed to the same level of detail, the results of which are presented in full in **Appendix E**.

The SUEs have been assessed in relation to their gross area, but with consideration of the housing numbers appropriate to the identified potential developable area.

6.2 B3 & B4: SUE Preferred Option and Reasonable Alternatives Appraisal

All SUE reasonable alternatives, including the preferred option, were appraised in line with the methodology presented in **Chapter 4**. The full results of this process are presented in **Appendix E**.

For each SUE, a single score was recorded against each SA Objective to indicate the likely overall effect, using a precautionary approach. **Table 6-2** presents the scores recorded for all SUEs against all SA Objectives.

6.2.1 Summary of effects

The scores recorded for each SUE reasonable alternative for each SA Objective have been collated in **Table 6-2**. These provide a high-level indication of the likely pre-mitigation risks and opportunities at each SUE.

Table 6-2: Summary of assessment results for SUE reasonable alternatives (full results in Appendix E)

Major negative	Minor negative	Neutral / negligible	Positive & negative	Uncertain	Minor positive	Major positive													
--	-	0	+/-	?	+	++													
SUE Option	SA Objective																		
	1 Energy and GHGs	2 Waste	3 Land & buildings	4 CC Resilience	5 Water resources	6 Biodiversity & geodiversity	7 Landscape	8 Cultural heritage	9 Air quality	10 Transport	11 Housing	12 Accessible services	13 Social cohesion	14 Culture & leisure	15 Safe & secure	16 Health	17 Education	18 Employment	19 Economy
SS/001 Allerton	-	-	-	-	-	-	-	-	-	-	+	+	++	+	0	+	+/-	++	+
SS/002 Clayton Heights	-	-	-	-	0	-	-	-	-	-	+	++	++	+	0	+	+	++	+
SS/003 South Bierley	-	-	--	-	-	-	-	-	-	+	+	+	++	+	0	+	+	++	+
SS/005 Holme Wood	-	-	--	-	-	-	-	--	-	-	++	++	++	+	0	+	++	++	++
SS/006 West of Cross Hill	-	-	--	-	-	-	-	--	-	+	+	++	++	+	0	+	++	++	+
SS/007 Thackley	-	-	--	-	-	-	-	-	-	+	++	++	++	+	0	+	++	++	+

It may be possible to reduce likely adverse effects once mitigation is implemented, while opportunities for enhancement may improve effects. It is apparent from **Table 6-2** that, generally speaking, each option performed fairly similarly for most SA Objectives and would risk negative effects arising on natural environment themed SA Objectives whilst delivering major benefits for social and economic themed SA Objectives.

SA operates at a high strategic level, with key indicators (particularly for when identifying potential significant effects) often relating to highly sensitive receptors such as international biodiversity designations. For the most part, the SUEs performed similarly in terms of potential significant effects and for that reason differentiating the SUEs in terms of their sustainability performance comes down to smaller differences that are not wholly reflected in the overall scoring presented in **Table 6-2**. In order to assist the Council with differentiating between options, further information on differentiating factors is presented in **Table 6-3**. The

factors highlighted in **Table 6-3** are only those where there is clear differentiation between the SUE options and do not necessarily account for every SA Objective.

Table 6-3: Further information on differentiating factors identified during the assessments for each SUE option

Site	Differentiating factors
SS/001 Allerton	<ul style="list-style-type: none"> • Land resources: Site does not contain BMV agricultural soils but does overlap with both coal and sandstone MSAs so could risk sterilising valuable minerals • Biodiversity: Site is not considered to coincide with Natural England’s GI network or the wider region’s woodland or grassland habitat networks • Heritage: There are no Listed Buildings within the site but there are several Grade II listings in proximity • Air quality: Site users would be unlikely to travel through an AQMA when travelling from the site to the City Centre if driving. However, access to public transport is limited whilst the site is slightly more isolated from key services and facilities than other options, which could result in a high reliance on personal car use with subsequent air quality impacts locally. • Health: Residents at the site would likely be outside the target distance of a GP surgery • Education: Some residents at the site would likely be within the target distance of a primary school, but residents would be outside of the target distance of a secondary school and the development would be likely to require additional school provision • Transport: Site has very poor access to a railway station, the nearest being just under 6km east, and limited access to frequent bus services. This SUE option would likely require improved highways/pedestrian access in support. • Employment: Of all SUE alternatives, Allerton is the most distant from Business Development, Enterprise and Employment Zones as well as Town and District Centres. The nearest are those just under 4km south-east at Longlands and Fieldhead. Residents here would therefore likely have more limited access to a diverse range of high-quality employment opportunities than would be the case at other SUEs, which is further exacerbated by Allerton’s limited access to a railway station. • Implications for spatial strategy: As one of the smaller sites, allocating Allerton would likely necessitate a greater number of sites elsewhere in the District to also be allocated to ensure that the housing need can be met. It is unclear how many sites this would be or where they would be located but the reliance on a larger number of smaller sites would limit opportunities for design measures that enhance sustainability, such as providing high-quality and biodiverse open spaces or incorporating energy efficiency and renewable energy generation measures.
SS/002 Clayton Heights	<ul style="list-style-type: none"> • Land resources: Site does not contain best and most versatile agricultural soils but does overlap with both coal and sandstone mineral safeguarding areas so could risk sterilising valuable minerals • Water resources: the site is not situated within any groundwater source protection zones or close to any surface waterbodies. • Biodiversity: Site coincides with Natural England’s GI network or the wider region’s woodland or grassland habitat networks. Development here would reduce connectivity. • Heritage: There is one Listed Building, Grade II, within the site. • Landscape: Development would result in the loss of a strip of greenfield and open space that runs between two areas of built form. This could the character of the local area and merge two distinct communities. • Air quality: Site users would be unlikely to travel through an AQMA when travelling from the site to the City Centre if driving. However, access to public transport is limited whilst the site is slightly more isolated from key services and facilities than other options, which could result in a high reliance on personal car use with subsequent air quality impacts locally. • Health: Residents at the site would have good access to all necessary health facilities • Education: Residents at the site would have good access to primary schools but would be likely to be outside of the target distance of secondary schools • Employment: Clayton Heights is just under 2.5km south-west of the nearest Employment Zone and Town and District Centre. Residents here would therefore potentially have slightly better access to a diverse range of employment opportunities than at Allerton, but not as good as at Holme Wood, West of Cross Hill or South Bierley. Clayton Heights also has limited access to a railway station. • Implications for spatial strategy: As one of the smaller sites, allocating Clayton Heights would likely necessitate a greater number of sites elsewhere in the District to also be allocated to ensure that the housing need can be met. It is unclear how many sites this would be or where they would be located but

Site	Differentiating factors
SS/003 South Bierley	<p>the reliance on a larger number of smaller sites would limit opportunities for design measures that enhance sustainability, such as providing high-quality and biodiverse open spaces or incorporating energy efficiency and renewable energy generation measures.</p> <ul style="list-style-type: none"> • Land resources: Site contains Grade 3 Agricultural Land Classification (ALC) soils, which could include best and most versatile (BMV) soils. The site coincides with mineral safeguarding areas for coal only and not sandstone. • Biodiversity: Site is coincident with the wider region’s grassland habitat network and could reduce connectivity. • Heritage: There are no Listed Buildings within the site. • Landscape: Site would result in the loss of most of the open greenspace in this corner of the District. • Air quality: Site users appear unlikely to drive through an AQMA. They would also have good access to a railway station and buses. • Health: Residents at the site would likely be outside the target distance of a GP surgery • Education: Residents at the site would have good access to primary schools but would be likely to be outside of the target distance of secondary schools • Employment: South Bierley, West of Cross Hill and Holme Wood are in proximity to several large Employment Zones and potentially offer similar excellent access to a diverse range of high quality employment opportunities (i.e. all three may be preferable in this regard when compared with Clayton Heights and Allerton). South Bierley is within 1km of Euroway Estate and Tong Street/Shetcliffe Lane Employment Zones. • Implications for spatial strategy: As one of the smaller sites, allocating South Bierley would likely necessitate a greater number of sites elsewhere in the District to also be allocated to ensure that the housing need can be met. It is unclear how many sites this would be or where they would be located but the reliance on a larger number of smaller sites would limit opportunities for design measures that enhance sustainability, such as providing high-quality and biodiverse open spaces or incorporating energy efficiency and renewable energy generation measures.
SS/005 Holme Wood	<ul style="list-style-type: none"> • Land resources: Site is entirely Grade 3 ALC soils, some of which could be BMV. It coincides with coal mineral safeguarding areas but not sandstone. • Biodiversity: There is an area of Ancient Woodland within the site. Site coincides with Natural England’s GI network as well as woodland and grassland habitat networks, for which it could reduce connectivity. • Heritage: There are six Grade II Listed Buildings and one Grade II* Listed Building within the site. • Landscape: Site would result in the loss of a large greenfield area but there would remain a much larger greenfield area east of the site. • Air quality and transport: Site users appear unlikely to drive through an AQMA, but access to a railway station is poor with the nearest being at Bradford Interchange 5.3km north west and Low Moor 5km south west. • Health: Residents at the site would likely be outside the target distance of a GP surgery • Education: Residents at the site would likely have good access to primary and secondary schools • Access: As the largest SUE, Holme Wood could provide better opportunities for delivering new key services and facilities as part of the development than other options. • Employment: The development of 9.06ha of employment land would provide new job opportunities and boost the local economy. South Bierley, West of Cross Hill and Holme Wood are in proximity to several large Employment Zones and potentially offer similar excellent access to a diverse range of high quality employment opportunities (i.e. all three may be preferable in this regard when compared with Clayton Heights and Allerton). Holme Wood is between 1km and 2km of Westgate Hill Street and Tong Street/Shetcliffe Lane Employment Zones. • Implications for spatial strategy: As a large site that could accommodate more development than any other SUE option, allocating Holme Wood would likely necessitate a lower number of sites elsewhere in the District to also be allocated to ensure that the housing need can be met. It could therefore provide better opportunities for design measures that enhance sustainability, such as providing high-quality and biodiverse open spaces or incorporating energy efficiency and renewable energy generation measures, than other SUE options.

Site	Differentiating factors
<p>SS/006 West of Cross Hill</p>	<ul style="list-style-type: none"> • Land resources: Site is partially Grade 3 ALC soils, which could be BMV. It coincides with coal mineral safeguarding areas but not sandstone. • Biodiversity: There is an area of Ancient Woodland within the site and a large area delineating the site's western perimeter. Site coincides with Natural England's grassland habitat networks, for which it could reduce connectivity. • Heritage: There are seven Grade II Listed Buildings within the site, as well as three Grade II* Listed Buildings • Landscape: Site would result in the loss of most of the large greenfield area in this corner of the District. • Air quality and transport: Site users could potentially drive through an AQMA via the A641, but access to a railway station is good with Low Moor between 1km and 2.5km east. • Health: Residents at the site would likely be within the target distance of a GP surgery • Education: Residents at the site would likely have good access to primary and secondary schools • Access: As the third largest SUE alternative, West of Cross Hill could provide better opportunities for delivering new key services and facilities as part of the development than smaller options. • Employment: South Bierley, West of Cross Hill and Holme Wood are in proximity to several large Employment Zones and potentially offer similar excellent access to a diverse range of high quality employment opportunities (i.e. all three may be preferable in this regard when compared with Clayton Heights and Allerton). West of Cross Hill is between 1km and 2km of Low Moor Employment Zone. • Implications for spatial strategy: As a large site that could accommodate more development than three of the other SUE options, allocating West of Cross Hill would likely necessitate a lower number of sites elsewhere in the District to also be allocated to ensure that the housing need can be met. It could therefore provide good opportunities for design measures that enhance sustainability, such as providing high-quality and biodiverse open spaces or incorporating energy efficiency and renewable energy generation measures, compared to other SUE options.
<p>SS/007 Thackley</p>	<ul style="list-style-type: none"> • Land resources: The majority of the site is situated on Grade 3 ALC soils, which could be BMV. The site coincides with coal and sandstone mineral safeguarding areas. • Biodiversity: An area of Ancient Woodland borders the eastern and north eastern site perimeters, and another area of Ancient Woodland is located approximately 30m to the west of the site. This site is partly situated within the Natural England GI corridor and there are a number of sections of the district's habitat network that adjoin the site. Development at this site could therefore reduce local ecological connectivity. • Heritage: A Scheduled Monument is located approximately 140m west of the site. There is a Grade II listed building adjacent to the south east site boundary and a Grade II listed building approximately 40m from the southern boundary. There is a cluster of six West Yorkshire archaeology class II sites located approximately 138m-430m west of the site, situated within an area of woodland. • Landscape: Development of this site would result in the loss of a large area of greenfield and Green Belt land. • Air quality and transport: The nearest AQMA is 4.6km south west of the site. The proposed Clean Air Zone is 2.8km south west of the site. It is unknown how many new residents would drive through the CAZ or the city's AQMAs. Access to railway stations and bus stops is good. Apperley Bridge station is approximately 1.4km to the east and Baildon station is approximately 1.4km to the west. The nearest bus stops on a high frequency corridor are located approximately 415m and 425m to the south of the site on Leeds Road. • Health: The nearest medical centre is Idle Medical Centre, which is approximately 1km south of the site's southern perimeter. New residents at the site would likely be within the target distance of a hospital. Site users would have good access to semi-natural habitats and the countryside via the PRoW network. • Education: Residents at the site would likely have good access to primary and secondary schools • Access: As the second largest SUE alternative, Thackley could provide better opportunities for delivering new key services and facilities as part of the development than smaller options. • Employment: All site users would be within 750-900m of the Shipley employment zone and within 4km of the Canal Road employment zone. Three Bradford district centres, including Shipley, are within 3km of the site. • Implications for spatial strategy: As a large site that could accommodate more development than four of the other SUE options, allocating Thackley would likely necessitate a lower number of sites elsewhere in the District to also be allocated to ensure that the housing need can be met. It could therefore provide good opportunities for design measures that enhance sustainability, such as providing high-quality and

Site	Differentiating factors
	biodiverse open spaces or incorporating energy efficiency and renewable energy generation measures, compared to these other SUE options.

For SA Objectives 1 and 2, all SUE reasonable alternatives were identified as likely to have a minor adverse effect. The construction and occupation of new dwellings would be expected to increase energy consumption and waste arisings at each location in relation to existing levels. Overall, the total number of dwellings to be delivered across Bradford is fixed, thus it is considered that the overall amount of energy and waste consumed would not vary significantly should one SUE option be chosen over another. However, the larger SUEs are likely to have greater potential for the viable delivery of sustainable design solutions, such as accommodating renewable energy generation, district heating, small-scale combined heat and power (CHP) or allocating spaces within SUEs for open space and habitats. In addition, smaller SUEs would necessitate a larger number of site allocations elsewhere in Bradford to help accommodate the necessary housing growth. It is unclear where these sites would be, but it is likely that a more piecemeal development approach would limit opportunities for energy efficient design and layout, and sustainable resource and waste management. This sentiment holds true for most SA Objectives - the magnitude of the effect on sustainability at any location increases with the scale of the proposed development but, the larger the SUE, the lower the number of other locations in Bradford that are needed for development.

The development of the South Bierley, Holme Wood, West of Cross Hill and Thackley SUEs may give rise to a major negative effect in relation to SA Objective 3 (land and buildings). While all SUEs are situated almost entirely on greenfield land and coincide with coal, or coal and sandstone, Mineral Safeguarding Areas (MSAs), these four SUEs are also located on Grade 3 ALC soil, which may potentially contain Best and Most Versatile (BMV) agricultural soils. Development at these locations could therefore be expected to result in significant levels of soil loss (e.g., through excavation, compaction or contamination) while potentially sterilising valuable mineral resources.

Each alternative is in Flood Zone 1 and so would situate residents in areas of very low fluvial flood risk. Whilst there are typically small stretches of land with high surface water flood risk at each SUE, due to small natural waterbodies, it is expected that development would avoid this land, in line with the wider Local Plan policies. The key concern with flood risk for these SUEs is considered to be the replacement of greenfield land with hardstanding. The replacement of permeable soils and infiltrating vegetation with buildings and infrastructure would alter overland flow and could exacerbate surface water flood risk downslope. Local Plan policies require flood risk to not be altered by new development, but it is likely going to be difficult to avoid this entirely when the development is of this scale and on this land. This would be mitigated to some extent by Local Plan policies requiring Green Infrastructure (GI) to be preserved and enhanced where possible, and for SuDS to be incorporated into each development.

The Clayton Heights and Thackley reasonable alternatives are best placed to avoid adverse impacts on water quality. Like all other SUE options, they do not coincide with a groundwater source protection zone but, unlike all other options, they also do not have a natural waterbody within their site perimeters. For all other options, there is a risk that the replacement of greenfield with development could negatively affect the quality of waterbodies that run through the SUEs.

Each SUE was recorded as having a negative effect on biodiversity. This is primarily due to the significant loss of greenfield that is an important element of the wider GI and habitat networks (including grassland and woodland). The impact would potentially be greater the greater the size of the SUE. Negative effects on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSIs) would not be expected due to the development of any of the SUEs, although the determination of effects on SACs, SPAs and SSSIs is subject to the findings of the separate Habitat Regulations Assessment (HRA) process. Development at each SUE, other than South Bierley, could risk harming areas of Ancient Woodland through a loss of supporting habitat or due to increases in recreational disturbance. It is recognised that Local Plan policies would help to ensure that any development at each SUE incorporates measures to protect biodiversity, such as through incorporating areas of open space or tree planting, but at this stage it is considered to be unlikely that a negative effect at each SUE could be prevented. However, it is recognised that Local Plan policies would help to avoid and mitigate many potential effects on biodiversity. By pursuing SUEs of these scales, there would also likely be opportunities for

including open space and areas of protected habitats that help to preserve the biodiversity value of the SUE as well as its role in the connectivity of the wider ecological network. The potential for this may be greater for the larger SUEs.

None of the reasonable alternatives would be expected to impact on sensitive landscape designations, such as National Parks or AONBs, however, all SUEs are either entirely located or largely located within the Green Belt, apart from the West of Cross Hill SUE. Given the scale of the development being proposed at large greenfield sites in the countryside, it is likely that alterations to the local landscape character would be difficult to entirely avoid or mitigate. This is particularly relevant to the larger SUEs. However, a proportion of each SUE would not be developed; the larger SUEs would potentially provide greater scope for sensitive masterplanning design, embedding enhancements and landscape integration/mitigation.

Within the site perimeter of the West of Cross Hill and Holme Wood alternatives are Grade II* Listed Buildings, in addition to a range of Grade II Listed Buildings. Major adverse impacts on the setting of these sensitive assets are likely due to the replacement of greenfield with built form. These alternatives would therefore be likely to have a more severe impact on the cultural heritage SA Objective than other reasonable alternatives, which would be expected to alter the setting of Grade II Listed Buildings. However, although the scoring takes into account the pre-mitigation scenario, it is recognised that through careful design and mitigation it may be possible to reduce predicted negative effects.

No alternative is coincident with an Air Quality Management Area (AQMA) or Clean Air Zone (CAZ) due to the distance from the SUEs to these areas of poor air quality. However, there is a risk that, given the scale of the proposed development, residents may drive through an AQMA or CAZ to access the development and this could make achieving air quality improvement targets more difficult.

For the housing, community, and cultural SA Objectives there is little to differentiate between the SUEs. All sites would deliver a major boost towards satisfying Bradford's housing needs, helping to accommodate its varied and growing population. However, it is recognised that Holme Wood and Thackley would deliver the highest number of dwellings. It is expected that in each case the provision of new houses and associated infrastructure at each location would enable new residents to participate in an existing local community whilst avoiding development of a scale or type that destabilises these communities. Generally speaking, each SUE also provides residents with opportunities to partake in local cultural activities, whilst the City also offers an excellent and diverse range of cultural spaces that are generally highly accessible via public transport for any new residents. Access to key services and amenities at each SUE is somewhat varied, with access appearing to be being the most limited at the Allerton SUE and the least limited at the Clayton Heights, Holme Wood, West of Cross Hill and Thackley SUEs.

Each SUE is predominantly greenfield and so new development at these locations could attract new crime. However, Local Plan policies would help to ensure that new development incorporates safety and security principles, such as through safe lock up, encouraging community interaction and enabling high rates of natural surveillance. Development at new SUEs could also regenerate areas and contribute towards increasing prosperity. The overall effect on safety and security therefore likely balances out as neutral in each case.

All SUEs are well situated to allow residents to pursue healthy and active lifestyles, generally being in proximity to GP surgeries, leisure centres/sports facilities, a diverse range of semi-natural habitats accessible via the Public Right of Way (PRoW) network and hospitals in the City. Due to the size of the SUEs, it currently appears that some residents at all SUEs would be outside of the target distance of a GP surgery. In line with Local Plan Policy ID1, it is expected that developer contributions towards new or enhanced health care infrastructure/facilities may be sought where development would result in a shortfall or worsening of provision. It can therefore be stated with some certainty that there would likely be an adequate provision of health care facilities for new and existing residents of the District.

Access to primary and secondary schools is varied. For the Clayton Heights and South Bierley SUEs, access to primary schools is generally good, however access to secondary schools would be outside of the target distance. At the Allerton SUE, the majority of residents would be outside the target distance of primary and secondary schools. The opposite is true for the Holme Wood, West of Cross Hill and Thackley SUEs where residents would be likely to have excellent access to both primary and secondary schools. It is uncertain at

this stage if all schools have the necessary capacity to accommodate new development. Policies in the Local Plan seek to ensure that there is sufficient educational infrastructure to support housing growth.

Access to employment zones at each SUE option is generally good, typically being within a few hundred metres via the local PRow or a brief commute via bus (i.e. residents would be expected to be within a five minute walk of a bus stop that has more than one service an hour, and they would only need to travel a few stops). Allerton is more distant from employment opportunities than the other options. but, given each option is an extension to the City of Bradford, at which there is a major and diverse range of high-quality employment opportunities, it is likely that residents would still have good access to jobs. The construction of new homes at the scales being considered would also provide a temporary boost to employment opportunities in the local construction sector.

The proposed development at Holme Wood is proposed to include employment land covering 9.06ha. It is expected that the construction and occupation of new homes, and new employment land at Holme Wood, would help to enhance the vitality and viability of communities and town centres on the edge of Bradford, while also providing a temporary boost to the local construction sector. The larger SUEs may afford greater potential opportunities in terms of attracting investment and delivering new employment opportunities.

7 Site Allocations

7.1 B2: Sites

Bradford District has been separated into sub-areas for the consideration of site allocations within the Local Plan. This allows for better consideration of local issues and opportunities, and the location of new housing and employment site options.

The sub-areas are:

- Airedale;
- North Bradford;
- Pennine Towns and Villages;
- South Bradford; and
- Wharfedale.

The Local Plan identifies a suite of preferred site options for each of these areas. A range of reasonable alternative site options were considered as part of this process (see **Appendix F**). Sites to be considered for inclusion in the Local Plan were identified through:

- Housing sites of 0.2ha of 5 units or more;
- Employment sites of 0.25ha or 500m² or more;
- Former (unimplemented) development plan (Replacement Unitary Development Plan) allocations;
- Sites with planning permission and extracted from the Council's Employment and Housing Land Registers;
- Call for sites submissions – the Council have issued previous calls for sites as part of its Strategic Land Availability Assessment (SLAA) work and received a large number of submissions from land owners, developers and members of the public;
- Sites identified through survey work;
- Sites identified through master plans and neighbourhood regeneration plans, and
- Sites identified through the Council's asset review – land or buildings which the Council considers are surplus to requirements.

Through the above processes the Council compiled a long list of initial site options. The Council filtered these options down to arrive at their reasonable alternatives. Sites were firstly prioritised if they met the following criteria:

- Lower flood risk;
- The use of brownfield land within settlements; and
- The locations of sites with regeneration areas.

The site assessment methodology used by the Council to identify reasonable alternatives is further detailed in the technical evidence supporting the Local Plan.

The full set of reasonable alternative sites is presented in **Appendix F**, where they have been assessed to the same level of detail using the same methodology with effects identified and described in a comparable manner. A summary of this process is set out in **section 3.4** of this report.

Table 7-1 presents the list of the Council's preferred non-strategic sites at the current stage of plan-making. The Preferred Sites that have 'HC' at the end of their reference have outline planning permission.

Table 7-1: Preferred options for non-strategic sites

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
Airedale	Baildon	BA/002	BA1/H	Stubbings Road	Residential
		BA/005A	BA2/H	West Lane (1)	Residential
		BA/008B	BA3/H	Cliffe Lane West	Residential
		BA/011	BA4/H	Green Lane	Residential
		BA/022	BA5/H	Meadowside Road, West of Baildon CE Primary School	Residential
		BA/023A	BA6/H	West Lane (2)	Residential
	Bingley	BI/005	BI1/H	Coolgardie Keighley Road	Residential
		BI/008	BI2/HC	Sty Lane	Residential
		BI/011	BI3/H	Greenhill Barn, Lady Lane	Residential
		BI/013A	BI4/H	West of Heights Lane, Eldwick	Residential
		BI/026	BI5/H	Crosley Wood Road	Residential
		BI/038	BI6/H	Marley Court	Residential
		BI/040	BI7/H	Whitley Road	Residential
		BI/059A	BI8/H	West of Heights Lane, Eldwick	Residential
		BI/057	BI10/E	John Escritt Road, Bingley	Employment
		BI/064	BI9/E	Castlefields Road	Employment
	Cottingley	CO/002	CO1/H	Marchcote Lane	Residential
	East Morton	EM/007	EM1/H	Street Lane	Residential
	Keighley	KY/003A	KY1/H	Hollins Lane	Residential
		KY/009A	KY2/H	Black Hill Lane	Residential
KY/012		KY3/H	Whinfield Drive	Residential	
KY/015		KY4/H	Braithwaite	Residential	

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
				Avenue	
		KY/017	KY5/H	North Dean Road	Residential
		KY/019	KY6/H	Holme Mill Lane	Residential
		KY/021B	KY7/H	Wheathead Lane	Residential
		KY/022	KY8/H	Higher Wheathead Farm	Residential
		KY/024B	KY9/H	Former Bronte School Playing Fields	Residential
		KY/025	KY10/H	Exley Road/Oakworth Road	Residential
		KY/027	KY11/H	Devonshire Works, West Lane	Residential
		KY/029a	KY12/H	Keighley Road, Exley Head (1)	Residential
		KY/029b	KY13/H	Keighely Road, Exley Head (2)	Residential
		KY/043	KY14/H	Bradford Road, Riddlesden, Keighley	Residential
		KY/046	KY15/H	Carr Bank, Riddlesden	Residential
		KY/047	KY16/H	Carr Bank, Riddlesden	Residential
		KY/049	KY17/H	Former Church of Christ the King, Riddlesden	Residential
		KY/054	KY18/H	Moss Carr Road, Long Lee, Keighley	Residential
		KY/056	KY19/H	Moss Carr Road, Long Lee	Residential
		KY/057	KY20/HC	Redwood Close	Residential
		KY/059	KY21/HC	Parkwood Rise	Residential
		KY/060	KY22/H	Parkwood Rise	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		KY/064	KY23/H	The Walk	Residential
		KY/065A	KY24/H	Marriner Road, Keighley (1)	Residential
		KY/069A	KY25/H	Hainworth Road	Residential
		KY/070/071	KY26/H	Hainworth Wood Road	Residential
		KY/073	KY27/H	Hainworth Lane/ Halifax Road, Keighley	Residential
		KY/075	KY28/H	Staveley Way, Keighley	Residential
		KY/081	KY29/H	Woodhouse Road, Keighley	Residential
		KY/083	KY30/H	Beck Street/Bridge Street	Residential
		KY/092	KY31/H	Cark Road, Keighley	Residential
		KY/099	KY32/H	James Street East	Residential
		KY/101	KY33/H	Parkwood Rise	Residential
		KY/125	KY34/H	Former Branshaw School	Residential
		KY/133	KY35/H	Land Off Golden View Drive, Thwaites	Residential
		KY/134A	KY36/H	Long Lee Lane	Residential
		KY/136	KY37/HC	Former Ingrow Corn Mill	Residential
		KY/138	KY38/H	Worthville Farm, Dawson Avenue	Residential
		KY/158	KY39/H	Bradford Road/Bronte Street	Residential
		KY/159A	KY40/H	The Bungalow, Harden Road, Long Lee	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		KY/164A	KY42/HC	Ryan Grove	Residential
		KY/167	KY43/H	Grange Street	Residential
		KY/172	KY44/H	Parson Street, Keighley	Residential
		KY/175	KY45/HC	Former Mortuary, Skipton Road	Residential
		KY/182	KY46/H	Land at Woodville Road	Residential
		KY/183	KY47/H	Former Site Of Sandbeds Methodist Church Swine Lane	Residential
		EM31	KY49/E	Beechcliffe	Employment
	Silsden	SI/001	SI1/H	North Dene Road	Residential
		SI/004A	SI2/H	Bolton Road / Brown Bank Lane	Residential
		SI/008	SI3/H	Woodside Road	Residential
		SI/013	SI4/H	Sykes Lane	Residential
		SI/020	SI5/HC	Keighley Road	Residential
		SI/023	SI6/H	Aire View Infants School, Elliot Street	Residential
		SI/024	SI7/H	Hothfield Junior School, Norton Street	Residential
		SI/027	SI8/H	Dradishaw Road	Residential
	Steeton with Eastburn	ST/001A	ST1/H	Summerhill Lane	Residential
		ST/002	ST2/H	Aireburn Avenue	Residential
		ST/010B	ST3/HC	West of Green Lane	Residential
		ST/023	ST4/H	Rear of Holly Fold	Residential
		EM78	ST5/E	Lyon Road	Employment
	Bradford	Bradford North	NE/013A	NE2/H	Westfield Lane,

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
	East			Wrose	
		NE/013C	NE3/H	Westfield Lane (Rear Kingsway) Wrose	Residential
		NE/025B	NE4/H	Simpsons Green	Residential
		NE/031	NE5/H	Prospect Road	Residential
		NE/034	NE6/H	Exmouth Place	Residential
		NE/035	NE7/H	Barkerend Mill, Barkerend Road	Residential
		NE/045	NE8/H	Old Park Road, Thorpe Edge	Residential
		NE/046	NE9/H	Arthur Street, Idle	Residential
		NE/047	NE10/H	Ravenscliffe Avenue, Ravenscliffe	Residential
		NE/055B	NE11/H	Harrogate Rd, Greengates	Residential
		NE/057	NE12/HC	Kings Drive, Wrose	Residential
		NE/081	NE13/H	Rawson Avenue, Thornbury	Residential
		NE/090	NE14/H	55 Joseph Street, Barkerend	Residential
		NE/109	NE15/H	Hinchliffe Street	Residential
		NE/112	NE16/H	Kyme Mills - Napier Terrace - Moorside Lane	Residential
		NE/113	NE17/H	Steadman Street, Barkerend	Residential
		NE/123	NE18/H	Rimswell Holt, Ravenscliffe	Residential
		NE/140	NE19/H	Land east of Harrogate Road, Greengates	Residential
		NE/163	NE20/HC	Site of Ashfield Mills	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		NE/182	NE21/H	Blakehill Works, Bradford Road, Idle	Residential
		EM90	NE23/E	Former Filter Beds, Esholt Waste Water Treatment Works	Employment
		EM113	NE22/E	Walkhill Farm, Apperley Lane	Employment
	Bradford North West	NW/001	NW1/HC	Snowdon Street	Residential
		NW/002	NW2/H	Drummond Trading Estate, Lumb Lane	Residential
		NW/007	NW3/HC	Spring Bank Place	Residential
		NW/010	NW4/H	Mansfield Road	Residential
		NW/012B	NW5/H	St Marys Road	Residential
		NW/013A	NW6/H	Priestman Street	Residential
		NW/015	NW7/H	Acacia Drive, Sandy Lane	Residential
		NW/018	NW8/H	High Ash Farm, Allerton, Allerton	Residential
		NW/023	NW9/H	Wilsden Road/West Avenue, Sandy Lane	Residential
		NW/024	NW10/H	Allerton Road, Prune Park Lane	Residential
		NW/026B	NW11H	North Parade, Allerton	Residential
		NW/030C	NW12/H	Lynfield Drive, Daisy Hill	Residential
		NW/031B	NW13/H	Millmoor Close	Residential
		NW/032	NW14/HC	Chellow Lane	Residential
		NW/040	NW15/H	Merrivale Road, Allerton	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		NW/041a	NW16/H	Allerton Lane/Chevet Mount (1)	Residential
		NW/041b	NW17/H	Allerton Lane/Chevet Mount (2)	Residential
		NW/046	NW18/H	Haworth Road, Playing fields, Heaton	Residential
		NW/049	NW19/H	Bingley Road/Long Lane, Heaton	Residential
		NW/052	NW20/H	Carlisle Road	Residential
		NW/054	NW21/H	Land to rear of Fearnside Terrace and Whetley Mills	Residential
		NW/066	NW22/H	Alton Court, Frizinghall	Residential
		NW/073	NW23/H	Church Street, Manningham	Residential
		NW/080	NW24/H	Rayner Mount Allerton	Residential
		NW/084	NW25/H	Belvedere Terrace, Hollings Road, Girlington	Residential
		NW/087	NW26/H	Thornton Road - Fairweather Green	Residential
		NW/088	NW27/H	Spring Bank Place	Residential
		NW/099	NW28/H	Patent Street, Manningham	Residential
		NW/104	NW29/H	Chapel Lane, Allerton	Residential
		NW/111	NW30/H	7-9 Oak Avenue, Frizinghall	Residential
		NW/123	NW31/H	Former Manningham Middle and Belle	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
				Vue Primary schools, Manningham Lane	
		NW/125	NW32/H	Allerton Mills	Residential
		NW/126	NW33/H	Site of Anvil Court, Church Street, Manningham	Residential
		NW/129	NW34/H	Lister Mill and Surrounds / Velvet Mill	Residential
		NW/130	NW35/H	29 Springfield Place	Residential
		NW/131	NW36/H	Heaton Mount	Residential
	Shipley	SH/014	SH1/H	East Victoria Street	Residential
		SH/019	SH2/H	Carr Lane	Residential
		SH/022	SH3/H	Wycliffe Road	Residential
		SH/026	SH4/H	Glenview Drive, Bankfield Road, Nabwood, Shipley	Residential
		SH/027	SH5/H	Bingley Road, Nabwood	Residential
		SH/028	SH6/H	Bankfield Farm, Nabwood	Residential
		SH/042	SH7/H	Queens Road/Ferncliffe Road - Saltaire	Residential
		SH/045	SH8/H	The Old School Building - Wrose Brow Road	Residential
		SH/052	SH9/H	Shipley Tax Office, Shipley	Residential
		SH/056	SH22/H	Wrose Brow Road, Windhill	Residential
	SH/057	SH21/H	Browfoot/Wrose Brow Road	Residential	

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		SH/058 (CR020)	SH10/H	Dockfield Road North/ Dockfield Road South	Residential
		SH/059	SH11/H	Land around Crag Road Flats	Residential
		SH/060	SH12/H	Crag Road	Residential
		SH/061	SH13/H	Regent House	Residential
		SH/062	SH14/H	Market Hall	Residential
		SH/063	SH15/H	Buildings along Briggate	Residential
		SH/064	SH16/H	Market Square	Residential
		SH/065	SH17/H	Shipleigh Gateway Site	Residential
		SH/066	SH18/H	Dock Lane	Residential
		SH/067	SH19/H	Land between Leeds Road and Dock Lane	Residential
		SH/068	SH20/H	Station Road	Residential
	Canal Road	CR/004	CR1/H	Bolton Road	Residential
		CR/014	CR2/H	Bolton Woods Quarry	Residential
		CR/017	CR3/H	Wapping Road, Bolton Road	Residential
		CR/033	CR4/H	North Avenue, Manningham	Residential
		CR/034	CR5/H	Frizinghall Road	Residential
		CR/036	CR6/H	North Bolton Hall Road	Residential
		CR/037	CR7/H	Thornhill Avenue	Residential
		CR/011 & CR/019	CR8/HC	New Bolton Woods	Residential
	Bradford City Centre	CC/001	CC1/H	Vacant site south of Sunbridge Road, bounded by Tetley St and	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
				Fulton St	
		CC/007	CC2/H	Former Bee Hive Mills, Smith Street	Residential
		CC/011	CC3/H	Globus Textiles, Listerhills Road/Smith Street/Longside Lane	Residential
		CC/018	CC4/H	Stott Hill West	Residential
		CC/020	CC5/H	Cathedral Quarter Phase 2	Residential
		CC/022	CC6/H	Midland Mills, Valley Road	Residential
		CC/024	CC7/H	Former Gas works and Foundry, Thornton Road / Listerhills Road	Residential
		CC/025	CC8/H	179 Sunbridge Rd	Residential
		CC/026	CC9/H	Former Tetley Street Shed, Tetley Street	Residential
		CC/027	CC10/H	Land and buildings south of Sunbridge Road	Residential
		CC/037	CC11/H	Wigan Street Car Park	Residential
		CC/038 & CC/094	CC12/H	Car Park, Simes Street & Oastler Centre, John Street	Residential
		CC/039	CC13/H	George Street	Residential
		CC/042	CC14/H	Thornton Road/Water Lane	Residential
		CC/044	CC15/H	Former Royal Mail Sorting Office	Residential
		CC/045	CC16/H	Area west of	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
				Valley Road	
		CC/047	CC17/H	Former Yorkshire Building Society HQ, High Point, New John Street	Residential
		CC/068A/D/F	CC18/H	Canal Road	Residential
		CC/068G	CC19/H	16-18 Mill Street	Residential
		CC/073	CC20/H	Yorkshire Stone Yard and Mill, Thornton Road/Lower Grattan Road	Residential
		CC/076	CC21/H	Burnett Street Car Park	Residential
		CC/078	CC22/H	East Parade Car Park	Residential
		CC/095	CC23/H	Land West of Wharf Street	Residential
		CC/096	CC24/H	Cathedral Quarter Phase 1	Residential
		CC/097	CC25/H	Vacant plot bounded by Church Bank, Peckover Street and Currer Street	Residential
		CC/099	CC26/H	Gate Haus 2	Residential
		CC/100	CC27/H	Stone Street Car Park	Residential
		CC/116	CC30/H	496 Leeds Road (Formerly SE/042)	Residential
		CC/113	CC28/H	Land and buildings east of Grattan Road	Residential
		CC/114	CC29/H	Buildings at Bradford College, Great Horton Road	Residential
		CC/119	CC31/E	No. 1 City Park	Employment

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		CC/120	CC32/E	Jacobs Well	Employment
		CC/121	CC33/E	Exchange Court	Employment
	Bradford South East	SE/001	SE1/H	Highbridge Terrace, West Bowling	Residential
		SE/003	SE2/H	Copgrove Road, Holmewood	Residential
		SE/005	SE3/H	Cleckheaton Road	Residential
		SE/015B	SE5/H	Upper Castle Street	Residential
		SE/027	SE6/H	Rooley Lane	Residential
		SE/030	SE7/H	Landscape Avenue, Holmewood	Residential
		SE/031	SE8/H	Greyswood Drive, Holmewood	Residential
		SE/032	SE9/H	Stonyhurst Square, Holmewood	Residential
		SE/033	SE10/H	Land at Muirhead Fold, Holmewood	Residential
		SE/035	SE11/H	Bolling Hall Laundry - Off Rooley Lane	Residential
		SE/038	SE12/H	Cordingley Street, Holmewood	Residential
		SE/042	CC30/H	496 Leeds Road	Residential
		SE/048	SE14/H	Albert Terrace, Oakenshaw	Residential
		SE/050A	SE15/H	Proctor Street Playing Fields, Off Tong Street, Holmewood	Residential
		SE/051	SE16/H	Holme Lane, Holmewood	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		SE/054	SE17/H	Kesteven Road / Heysham Drive, Holmewood	Residential
		SE/063	SE19/H	Westgate Hill Street, Tong	Residential
		SE/069	SE20/HC	Dean Beck Avenue	Residential
		SE/076	SE21/H	New Lane, Laisterdyke	Residential
		SE/079	SE22/H	Furnace Road, Oakenshaw	Residential
		SE/089	SE23/HC	Tennis Avenue	Residential
		SE/092	SE24/HC	Upper Castle Street	Residential
		SE/102	SE25/H	Grayswood Drive, Holmewood	Residential
		SE/109	SE26/H	Shetcliffe Lane	Residential
		SE/111	SE27/HC	Mead View, Holmewood(1)	Residential
		SE/114	SE28/H	Somerton Drive, Holmewood	Residential
		SE/118	SE29/H	Kaycell Street, Bierley	Residential
		SE/128	SE30/H	Bierley Lane, Bierley	Residential
		SE/181	SE27/HC	Mead View, Holmewood	Residential
		EM1	SE29/E	Neville Rd/ Lower Lane	Employment
		EM3	SE43/E	Dick Lane	Employment
		EM12	SE40/E	Staithegate Lane North	Employment
		EM14	SE41/E	Westgate Hill Street	Employment
		EM18	SE32/E	Euroway Trading Estate,	Employment

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
				Commondale Way	
		EM19	SE42/E	Staithegate Lane, South	Employment
		EM21	SE38/E	AH Marks Works, Wyke Lane	Employment
		EM46	SE33/E	Land to the East of Laisterdyke and South of Leeds Road	Employment
		EM53	SE34/E	Land East of Sticker Lane	Employment
		EM54	SE35/E	Land adjoining Lower Lane, Parry Lane and Sticker Lane.	Employment
		EM87	SE36/E	Parry Lane	Employment
	Bradford South West	SW/002	SW1/H	Back Fold, Clayton	Residential
		SW/005B	SW2/H	Westminster Avenue	Residential
		SW/006	SW3/H	Ferndale, Clayton	Residential
		SW/007	SW4/H	Brook Lane, Clayton	Residential
		SW/10A	SW5/H	Langberries, Clayton (smaller site)	Residential
		SW/10B	SW6/H	Highgate Grove, Clayton Heights (smaller site)	Residential
		SW/013	SW7/H	Theakston Mead/Thirsk Grove	Residential
		SW/017	SW8/H	Frensham Drive	Residential
		SW/021B	SW9/H	Woodlands Road	Residential
		SW/022	SW10/H	Stocks Lane, Old Dolphin, Clayton Heights	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		SW/029	SW11/H	Dirkhill Road	Residential
		SW/031	SW12/H	Horton Park Avenue	Residential
		SW/033	SW13/H	Cannon Mills, Cannon Mill Lane / Union Road, Great Horton	Residential
		SW/034A	SW14/H	Fenwick Drive, Woodside	Residential
		SW/035	SW15/H	Thornton Road/Munby Street	Residential
		SW/036	SW16/H	Cottam Avenue	Residential
		SW/043	SW17/H	Briggella Mills and Little Horton Lane	Residential
		SW/045	SW18/H	Fall Top Farm, Clayton	Residential
		SW/048A	SW19/H	Junction with Park Road, Manchester Road, Little Horton	Residential
		SW/052	SW20/H	Quaker Lane, Southfield Lane	Residential
		SW/057	SW21/H	Thornton Road, Leaventhorpe	Residential
		SW/059 (part)	SW22/H	Baldwin Lane	Residential
		SW/060	SW23/H	Northside Road Girlington	Residential
		SW/061B	SW24/H	Northside Road, Girlington	Residential
		SW/065	SW25/H	Lingdale Road, Woodside	Residential
		SW/066	SW26/H	Land to south of Abb Scott Lane	Residential
		SW/083	SW27/H	Paradise Fold, Great Horton	Residential

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		SW/088	SW28/H	Abb Scott Lane, Low Moor	Residential
		SW/098	SW29/H	Harris Court Mill, Great Horton Road, Great Horton	Residential
		SW/108	SW30/H	Brafferton Arbor, Buttershaw	Residential
		SW/119	SW31/H	Former Odsal Clinic 55 Odsal Road	Residential
		SW/122	SW32/H	Church Street - Buttershaw	Residential
		SW/124	SW33/H	Land off Buckingham Crescent, Clayton	Residential
		SW/134	SW34/H	Meadway, Wibsey	Residential
		SW/139	SW35/H	All Saints Road	Residential
		SW/142	SW36/HC	Highgate Road	Residential
		SW/148	SW37/H	Cousen Road	Residential
		SW/150	SW38/HC	Dovesdale Road	Residential
		SW/155	SW39/H	Bowman Road, Wibsey	Residential
		SW/156	SW40/H	Northside Rd	Residential
		SW/157	SW41/HC	Blamires Street	Residential
		SW/158	SW42/HC	Reevy Road West/The Crescent, Buttershaw	Residential
		SW/160	SW43/H	Bell House, Southfield Lane	Residential
		EM8	SW48/E	Ingleby Road	Employment
		EM112	SW47/E	Between Clayton Lane and Lister Arms	Employment

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
Pennine Towns & Villages	Cullingworth	CU/001	CU1/H	Halifax Road	Residential
		CU/004	CU2/H	Cullingworth Mill	Residential
		CU/013	CU3/H	Cullingworth Road / Doll Lane	Residential
	Denholme	DH/016	DH1/H	Station Road	Residential
	Harden	HR/004	HR1/H	Chelston House	Residential
		HR/005	HR2/H	South Walk	Residential
		HR/006	HR3/H	Long Lane	Residential
	Haworth	HA/001	HA1/H	Worstead Road, Crossroads	Residential
		HA/003	HA2/H	Lees Lane, Crossroads	Residential
		HA/004	HA3/H	Lees Lane, Crossroads	Residential
		HA/005	HA4/H	Ebor Mills, Ebor Lane	Residential
		HA/008	HA5/H	Ashlar Close	Residential
		HA/010	HA/6H	Ivy Bank Lane,	Residential
	Oakworth	OA/002	OA1/H	Pasture Avenue	Residential
		OA/007A	OA2/H	Keighley Road / Sykes Lane (1)	Residential
	Oxenhope	OX/003	OX1/H	Crossfield Road	Residential
		OX/014	OX2/H	Cross Lane Oxenhope	Residential
	Queensbury	QB/001	QB1/H	Albert Road / Denholme Road	Residential
		QB/002	QB2/H	Albert Road	Residential
		QB/004	QB3/H	Blackdyke Mills	Residential
		QB/007	QB4/H	Brighthouse Road	Residential
QB/010		QB5/H	Jackson Hill Lane / Brighthouse Road	Residential	
QB/011A		QB6/H	Station Road	Residential	

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development	
				West / Sharket Head Close		
		QB/014A	QB7/H	Old Guy Road / Fleet Lane (1)	Residential	
		QB/035	QB9/H	Long Lane (1)	Residential	
		QB/036	QB10/H	Long lane (2)	Residential	
	Thornton		TH/002A	TH1/HC	Hill Top Road (2) (Masterplan)	Residential
			TH/003	TH2/H	Thornton Road (1) (masterplan)	Residential
			TH/006	TH3/H	Thornton Road (2)	Residential
			TH/009	TH4/H	Hill Top Road (1) (masterplan)	Residential
			TH/010	TH5/H	Hill Top Road (3) (masterplan)	Residential
			TH/012	TH6/H	Dole and Prospect Mills	Residential
			TH/018	TH7/H	Old Road	Residential
			TH/027	TH8/HC	Thornton Road West	Residential
			TH/029	TH9/H	Hill Top Road / Close Head Drive (masterplan)	Residential
			TH/033A	TH10/H	Hill Top Road, near Ring O' Bells	Residential
			TH/033B	TH11/H	South of Hill Top Road and East of Close Head Lane	Residential
	Wilsden		WI/002	WI1/H	Crooke Lane	Residential
			WI/005B	WI2/H	Crack Lane	Residential
			WI/013	WI3/H	Moorside Farm	Residential
	Wharfedale	Addingham	AD/001	AD1/H	Turner Lane	Residential
AD/002D			AD2/H	Parsons Lane	Residential	

Sub-Area	Settlement	SHLAA Site ref.	Preferred Options ref.	Site address	Potential development
		AD/004A	AD3/H	Main Street / Addingham Bypass (East)	Residential
		AD/004B	AD4/H	Main Street / Addingham Bypass (West)	Residential
		AD/011A	AD5/H	Chapel Street	Residential
		AD/012	AD6/H	Moor Lane	Residential
		AD/020	AD7/H	Turner Lane / Silsden Road	Residential
		AD/022	AD8/H	Church Street / Main Street	Residential
	Burley in Wharfedale	BU/001	BU1/H	Sun Lane / Ilkley Road	Residential
		BU/013	BU2/H	Scalebor House, Moor Lane	Residential
	Ilkley	IL/009	IL1/H	Wheatley Grove	Residential
		IL/011B	IL2/H	Skipton Road East	Residential
		IL/014	IL3/H	Countances Way	Residential
		IL/033	IL4/H	Stockheld Road	Residential
	Menston	ME/002	ME1/H	Bingley Road	Residential
		ME/003	ME2/H	Derry Hill;	Residential

7.2 B3 & B4: Site Assessments

All reasonable alternative site options, including the preferred options, were appraised in line with the methodology presented in **section 3.4**.

The full results of this process are presented in **Appendix F**.

For each site, a single score was recorded against each SA Objective to indicate the likely overall effect on that SA Objective, using a precautionary approach.

The assessment results in **Appendix F** are presented on a sub-area and settlement by settlement basis. **Table 7-2** presents the scores recorded for all preferred option sites against all SA Objectives.

7.2.1 Summary of effects

It is noted that the summary text below references the 'site refs' as opposed to the Preferred Option references. A comparison table is presented in the summary table of scores (Table 7-2).

Airedale

In the Airedale sub-area, a total of 74 preferred option housing sites and two employment sites have been identified.

Significant adverse effects have been identified in relation to land and building (SA Objective 3), due to the loss of over 0.4ha of greenfield land for many of the preferred sites. Significant beneficial effects have been identified for Sites BI/038 and KY/027 as these sites comprise land with an Agricultural Land Classification (ALC) Grade of 'Urban'.

Significant negative effects have been identified in relation to climate change resilience (SA Objective 4) for Sites BI/005, EM31, SI/013, KY/064, KY/065A and KY/134A due to potential flood risk. Design measures can be incorporated into future developments on these sites to help combat any potential rise in flood risk, for example, Sustainable Drainage Systems. In addition, alternative site layouts could be explored to minimise development on land that is at the highest risk of flooding.

Sites EM31 and KY/083 would be expected to give rise to a major negative effect in relation to water resources (SA Objective 5) due to the proposed development having the potential to pose a risk on water quality.

Significant negative effects have been identified in relation to biodiversity & geodiversity (SA Objective 6) for Sites BI/026 and KY/070/071. In relation to Site BI/026. There is a statutory designated ecological site approximately 20m from the site's western perimeter. Consultation with Natural England would be required to ensure that this designated site would not be harmed. In addition, the site sits within Natural England's Green Infrastructure corridor and so future development would potentially diminish local ecological connectivity. Future development is to incorporate green infrastructure and enhance the biodiversity value of outdoor amenity spaces and local ecological connectivity, whilst meeting biodiversity net gain requirements. In regard to Site KY/070/071, it may be possible to avoid or reduce any potential likely adverse effects by incorporating green infrastructure and enhancing the biodiversity value of outdoor amenity spaces and local ecological connectivity, whilst meeting biodiversity net gain requirements.

Significant adverse effects have been identified in relation to cultural heritage (SA Objective 8) for sites EM31, BI/013, BI/059 and KY/003A due to potential effects on the setting of nearby heritage assets. This may be addressed through the design process of any future development to ensure that any likely significant adverse effects are avoided.

Significant positive effects were identified in relation to transport (SA Objective 10) for Sites BA/011, BI/005, BI/040, KY/060, KY/064, KY/083, KY/099, KY/101, KY/172 and ST/001A.

Significant beneficial effects have been identified in relation to social cohesion (SA Objective 13) for Sites KY/009A, KY/012, KY/015, KY/017, KY/027, KY/167 and KY/172.

Significant beneficial effects have been identified for Sites BA/008B, BA/011, BI/005, BI/013, BI/026, BI/038, BI/040, BI/059, CO/002, KY/025, KY/027, KY/029a, KY/049, KY/056, KY/064, KY/065A, KY/073, KY/075, KY/081, KY/083, KY/092, KY/099, KY/125, KY/133, KY/134A, , KY/159A, KY/167, KY/172, KY/182SI/008, SI/013, SI/023, SI/024, SI/027 and ST/002 in relation to health (SA Objective 16).

Significant beneficial effects have been identified in relation to education (SA Objective 17) for Sites BA/002, BA/005A, BA/023A, BI/026, BI/040, KY/025, KY/027, KY/060, KY/070/071, KY/073, KY/075, KY/083, KY/092, KY/099, KY/101, KY/125, KY/138, KY/158, KY/167, KY/182 and ST/023.

Significant beneficial effects in relation to employment (SA Objective 18) has been identified for all potential employment sites.

North Bradford

There are 21 potential housing preferred sites and three employment sites in North Bradford.

Significant negative effects have been identified in relation to land and buildings (SA Objective 3) for a number of sites in North Bradford. This is due to a loss of over 0.4ha of greenfield land. Most of the preferred site in the city centre would be likely to have a significant positive impact in relation to land and buildings due to these sites having some vegetation and not being entirely PDL.

Sites with a major positive effect on climate change resilience (SA Objective 4), are CC/027, CC/038, CC/076 and CC/078. Sites with a major negative influence on climate change resilience are CC/022, CC/024, CC/039, CC/042, CC/044, CC/045, CC/068A/D/E, NE/140, EM90, NW/066, SH/017 and SH/052, SH058 and SH/060.

All sites, with the exception of CC/001, CC/007, CC/011, CC/018, CC/020, CC/022, CC/024, CC/037, CC/038, CC/039, CC/095 and CC/096 in the city centre have been identified as having a major positive effect on biodiversity & geodiversity (SA Objective 6), and landscape & townscape (SA Objective 7).

The significant negative effects in relation to cultural heritage (SA Objective 8) for the sites in Shipley are largely related to the proximity of the Saltaire World Heritage Site buffer zone. Sites with potential to result in significant adverse impacts include NE/034, SH/022 and SH/052. This assessment is a precautionary pre-mitigation assessment and thus it may be feasible to mitigate these effects to a not significant effect by implementing policy measures in the Local Plan and site-specific mitigation.

Sites CC/027, CC/073 and CC/079 in the City Centre will have major negative influences regarding air quality (SA Objective 9) due to their proximities to AQMAs. Significant negative effects have also been identified for Sites CR/004, CR/017, CR/033, CR/011/CR/019 and CR/034. These sites are located within Clean Air Zones (CAZs). Other sites identified as giving rise to significant adverse effects include NE/031, NE/034, NE/035, NE/090, NE/109, NE/111, NE/112, NE/113, NE/134, NW/002 NW/010, NW/012B, NW/013A, NW/052, NW/054, NW/073, NW/084, NW/088, NW/123, NW/129, NW/130, NW/131, SH/014, SH/022, SH/026, SH/027, SH/028, SH/042, SH/052, SH/058, SH/063, SH/060, SH/064, SH/062, SH/065 and SH/068. These assessment findings are pre-mitigation and are based on a precautionary principle. It may be feasible to mitigate these effects to a not significant effect by implementing policy measures in the Local Plan and site-specific mitigation.

Significant positive effects have been identified in relation to transport (SA Objective 10) for sites NE/031, NE/090, EM/113, NW/088, NW/130 and NW/131, SH/014, SH/042, SH/058, SH/066, SH/067, SH/063, SH/059, SH/060, SH/061, SH/064, SH/062, SH/065, SH/068, CR/004, CR/014, CR/017, CR/034, CR/036 and CR/037.

Significant positive effects have been identified in relation to social cohesion (SA Objective 13) for sites NE/031, NE/034, NE044, NE/046, NE/047, NE/109, NE/111, NE/123, and NE/182.

NW/002, NW/012B NW/013A, NW/040, NW/041a, NW/041b, NW/046, NW/054, NW/073, NW/080, NW/084, NW/099, NW/123 and NW129.

Most of the sites in North Bradford have a major positive impact on health (SA Objective 16).

Significant positive effects have been identified in relation to education (SA Objective 17) for Sites NE/025B, NE/031, NE/034, NE/035, NE/045, NE/081, NE/090, NE/109, NE/111, NE/112, NE/113, NE/, NE/163, NW/010, NW/012B, NW/013A, NW/030C, NW/040, NW/041a, NW/046, NW/052, NW/066, NW/073, NW/080, NW/087, NW/088, NW/099, NW/104, NW/111, NW/123, NW/125, NW/126, NW/129, NW/130, NW/131, SH/022, SH/026, SH/042, SH/052, CR/004, CR/014, CR/017, CR/033, CR/034, CR/036, CR/037, CC/020, CC/039, CC/068A/D/E, CC/076, CC/078, CC/095, CC/096, CC/097, CC/099, and CC/114 due to their respective distances from primary and secondary schools.

Pennine Towns and Villages

A total of 41 housing sites. There are no employment sites in the Pennine Towns and Villages are preferred options.

All sites with the exception of QB/002, TH/018, TH/012, WI/002, CU/001, CU/004, DH/016, HA/005, HA/008 and HA/010 have been identified as giving rise to significant adverse effects in relation to land and buildings (SA Objective 3). This is because the sites are located on greenfield land over 0.4 hectares. Site HS/005 is also the only site that scores positively (significant) in relation to land and buildings due to the development being on PDL land.

Significant negative effects in relation to climate change resilience (SA Objective 4) have been identified for Site WI/005B, OX/003, OX/014, CU/004, DH/016, as parts of this site are subject to a medium to high flood

risk. This could potentially be addressed through measures such as Sustainable Drainage Systems and by exploring alternative site layouts to avoid the highest risk areas.

Significant negative effects in relation to biodiversity & geodiversity (SA Objective 6) for all sites with the exception of QB/036. The HRA Screening process has identified that likely significant effects on the South Pennine Moors SPA/SAC are triggered and therefore cannot be ruled out at this stage. This is related to potential recreation impacts.

Significant positive effects have been identified in relation to health (SA Objective 16) for Sites WI/002, WI/005B, WI/013, OA/002, OA/007A, CU/001, CU/004, DH/007, DH/016, HA/005, HA/008 and HA/010, QB/001, QB/002, QB/004, QB/007, QB/011A, QB/035, QB/036, DH/016, TH/006, TH/012 and TH/018.

In relation to education (SA Objective 17), Sites TH/012, QB/001, QB/002, QB/004, QB/011A, QB/035, QB/036, QB/014A, CU/001, CU/004 and CU/013 have been identified as giving rise to significant beneficial effects.

South Bradford

There are 72 potential housing sites that are preferred options in South Bradford and 16 employment sites.

Significant negative effects have been identified in relation to land and buildings (SA Objective 3) for Sites EM/8, SW/002, SW/005B, SW/006, SW/007, SW/10B, SW/013, SW/017, SW/021B, SW/022, SW/034A, SW/045, SW/057, SW/059, SW/060, SW/065, SW/066, SW/124, SW/139 and SW/155 in Bradford South West and all sites in Bradford South East, with the exception of Sites SE/005, SE/032, SE/035, SE/038, SE/042, SE/048, SE/054, SE/079, SE/114, SE/118, EM1, EM87 and SE44/E. This is due to the loss of over 0.4ha of greenfield land.

Significant negative effects have been identified in relation to climate change resilience (SA Objective 4) for Sites SW/035, SW/057, SW/139, EM1, EM21 and EM46 due to potential flood risk. Proposals are to incorporate sustainable urban drainage to help mitigate flood risk. Alternative site layouts are to be explored with a view to avoiding the areas of highest flood risk.

Significant negative effects have been identified in relation to air quality (SA Objective 9) for Sites SE/001, SE/015B, SE/027, SE/035, SE/042, SE/069, EM1, EM12, EM46, EM53, EM54, EM87, SW/029, SW/031, SW/036, SW/043, SW/047, SW/048A, SW/052, SW/139, SW/148, EM8 and EM/112. This is due to their location within, or in close proximity to a Clean Air Zone (CAZ). Development proposals should demonstrate how any adverse impacts on any nearby Air Quality Management Areas and/or Clean Air Zones (CAZ) will be avoided and how positive impacts will be delivered. In addition, a mitigation programme is to be prepared for development within CAZs.

Significant negative effects have been identified in relation to transport (SA Objective 10) for Site SW/124, due to its location from public transport services. Significant beneficial effects have been identified in relation to transport for sites SE/005, SE/048, SE/079 and SW/048A.

Significant positive effects have been identified in relation to social cohesion (SA Objective 13) for Sites SE/001, SE/003, SE/030, SE/031, SE/032, SE/033, SE/035, SE/038, SE/042, SE/050A, SE/051, SE/054, SE/089, SE/102, SE/111, SE/114, SW/013, SW/031, SW/033, SW/108, SW/119, SW/122 and SW/134.

Significant positive effects have been identified in relation to health (SA Objective 16) for Sites SE/001, SE/003, SE/014, SE/015B, SE/027, SE/031, SE/032, SE/033, SE/035, SE/038, SE/042, SE/046, SE/050A, SE/054, SE/055, SE/089, SE/102, SE/111, SE/114, SE/118, SE/137, SE/128, SE/181, SW/002, SW/013, SW/017, SW/029, SW/031, SW/033, SW/036, SW/043, SW/047, SW/052, SW/057, SW/065, SW/066, SW/088, SW/098, SW/108, SW/119, SW/122, SW/139, SW/148, SW/155, and SW/160. Significant adverse effects have been predicted for Sites SE/005, SE/048 and SE/079 in relation to health.

Significant beneficial effects have been identified in relation to education (SA Objective 17) for Sites SE/001, SE/015B, SE/027, SE/030, SE/031, SE/032, SE/033, SE/035, SE/038, SE/042, SE/050A, SE/051, SE/054, SE/062, SE/063, SE/076, SE/081, SE/089, SE/102, SE/111, SE/114, SE/118, SE/181, SW/002, SW/10B, SW/013, SW/017, SW/029, SW/031, SW/033, SW/035, SW/036, SW/043, SW/047, SW/048A, SW/052,

SW/057, SW/060, SW/061B, SW/066, SW/098, SW/108, SW/122, SW/124, SW/139, SW/148, SW/155, SW/156 and SW/160.

Significant positive effects have been identified in relation to employment for all employment sites (SA Objective 18). With the exception of Site SE44/E and SW/047, all employment sites were identified as giving rise to significant positive effects in relation to economy (SA Objective 19).

Wharfedale

In Wharfedale, there are 16 preferred option housing sites.

Significant negative effects have been identified in relation to land and buildings (SA Objective 3) for Sites AD/001, AD/004A, AD/004B, AD/011B, AD/012, AD/022, BU/001, BU/013, IL/009 and IL/014. This is due to a loss of over 0.4ha of greenfield land.

Significant negative effects have been identified in relation to climate change resilience (SA Objective 4) for Site AD/011A as a large extent of the site is at high risk of surface water flooding. Significant negative effects have also been identified for Site IL/014. It is unknown at this stage whether future development on these sites would be able to entirely avoid areas of medium to high flood risk, given the number of dwellings being considered. The implementation of Sustainable Drainage Systems could help to mitigate any adverse effects.

In relation to cultural heritage (SA Objective 8), the development of Site IL/033 may give rise to a significant negative effect. The site is currently undeveloped greenfield land and is located within a Conservation Area. A Scheduled Ancient Monument is located approximately 30m north of the site.

Significant positive effects have been identified in relation transport (SA Objective 10) for Sites IL/014 and IL/033.

Significant positive effects have been identified in relation to health (SA Objective 16) for Sites AD/011A, AD/022, BU/013 and ME/002 due to these sites being within the target distances of all necessary health facilities.

Table 7-2: Summary of assessment results for preferred option sites (full results in Appendix F)

Major negative		Minor negative		Neutral / negligible		Positive & negative		Uncertain		Minor positive		Major positive								
--		-		0		+/-		?		+		++								
PO Ref	Site	Effect score recorded for each SA Objective																		
		1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
Airedale Sub-Area: Housing Sites																				
BA1/H	BA/002	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	++	+	+
BA3/H	BA/005 A	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	++	+	+
BA5/H	BA/008 B	-	-	--	+	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+/-	+
BA6/H	BA/011	-	-	--	-	-	--	-	-	++	+	+	+	+	+	+/-	++	+	+	+
BA1/H	BA/022	-	-	--	+	-	--	-	0	-	+	+	+	+	+	+/-	+	+	+	+
	BA/023 A	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	++	+	+
BA2/H	BA/023 A	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	++	+	+
BI1/H	BI/005	-	-	--	--	-	--	-	-	++	+	+	+	+	+	+/-	++	+	+	+
BI4/H	BI/008	-	-	--	+	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+	+
BI5/H	BI/011	-	-	--	+	-	--	-	-	-	+	-	+	+	+	+/-	+	-	+	+
BI6/H	BI/013	-	-	--	+	-	--	+	--	-	+	+	+	+	+	+/-	++	+	+	+
BI7/H	BI/026	-	-	-	+	-	--	-	-	-	+	+	+	+	+	+/-	++	++	+	+
BI8/H	BI/038	-	-	++	+	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+	+
BI1/H	BI/040	-	-	+	-	-	--	+	+	++	+	+	+	+	+	+/-	++	++	+/-	+
BI3/H	BI/059	-	-	--	-	-	--	-	--	-	+	+	+	+	+	+/-	++	+	+	+
CO1/H	CO/002	-	-	--	+	-	--	-	-	-	+	+	+	+	+	+/-	++	-	+	+
EM1/H	EM/007	-	-	--	+	-	--	-	-	-	+	+	+/-	+	+	+/-	+	+	+	+
KY1/H	KY/003 A	-	-	--	+	-	--	-	--	-	+	+	-	+	+	+/-	+	+	+	+
KY2/H	KY/009 A	-	-	--	+	-	--	-	0	-	+	+	-	++	+	+/-	+	++	+/-	+
KY3/H	KY/012	-	-	+/-	+	-	--	+	0	-	+	+	+/-	++	+	+/-	+	+	+	+
KY4/H	KY/015	-	-	--	+	-	--	+	0	-	+	+	+/-	++	?	+/-	+	++	+	+
KY5/H	KY/017	-	-	-	+	-	--	+/-	0	-	+	+	+/-	++	+	+/-	+	++	+	+
KY6/H	KY/019	-	-	--	+	-	--	-	0	-	+	+	+/-	+	+	+/-	+	++	+	+
KY7/H	KY/021 B	-	-	--	+	-	--	-	0	-	+	+	-	+	+	+/-	+	++	+/-	+
KY8/H	KY/022	-	-	+/-	-	-	--	+	0	-	+	+	-	+	+	+/-	+	+	+/-	+
KY9/H	KY/024 B	-	-	+/-	+	-	--	-	0	-	+	+	+/-	+	+	+/-	+	+	+	+
KY10/H	KY/025	-	-	--	-	-	--	-	0	-	+	+	+	+	+	+/-	++	++	+	+
KY11/H	KY/027	-	-	++	+	-	--	+	0	-	+	+	+	++	+	+/-	++	++	+	+
KY12/H	KY/029a	-	-	--	+	-	--	-	0	-	+	+	+/-	+	+	+/-	++	+	+/-	+
KY13/H	KY/029b	-	-	--	+	-	--	-	0	-	+	+	+/-	+	+	+/-	+	+	+/-	+
KY14/H	KY/043	-	-	--	-	-	--	-	-	-	+	+	+	+	+	+/-	+	-	+	+
KY15/H	KY/046	-	-	--	-	-	--	-	-	-	+	+	+	+	+	+/-	+	-	+/-	+
KY16/H	KY/047	-	-	+/-	+	-	--	-	0	-	+	+	+	+	+	+/-	+	+	+	+
KY17/H	KY/049	-	-	+/-	+	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+	+

PO Ref	Site	Effect score recorded for each SA Objective																		
		1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
H																				
KY18/H	KY/054	-	-	--	+	-	--	-	O	-	+	+	-	+	+	+/-	+	-	+/-	+
KY19/H	KY/056	-	-	--	+	-	--	-	O	-	+	+	-	+	+	+/-	++	+	+/-	+
KY20/HC	KY/057	-	-	--	+	-	--	-	O	-	+	+	-	+	+	+/-	++	+	+	+
KY21/HC	KY/059	-	-	--	+	-	--	-	O	-	+	+	+	+	+	+/-	+	+	+	+
KY22/H	KY/060	-	-	--	+	-	--	-	O	-	++	+	+	+	+	+/-	+	++	+	+
KY23/H	KY/064	-	-	-	--	-	--	+	+	-	++	+	+	+/-	+	+/-	++	+	+/-	+
KY24/H	KY/065 A	-	-	--	--	-	--	-	O	-	+	+	+	+/-	+	+/-	++	+	+	+
KY25/H	KY/069 A	-	-	--	+	-	--	-	O	-	+	+	+	+	+	+/-	+	+	+	+
KY26/H	KY/070/071	-	-	-	+	--	--	-	O	-	-	+	+	+	+	+/-	+	++	+	+
KY27/H	KY/073	-	-	-	-	-	--	-	O	-	+	+	+	+	+	+/-	++	++	+	+
KY28/H	KY/075	-	-	-	-	-	--	+	O	-	+	+	+	+	+	+/-	++	++	+	+
KY29/H	KY/081	-	-	--	-	-	--	-	O	-	+	+	+	+/-	+	+/-	++	+	+	+
KY30/H	KY/083	-	-	+/-	-	--	--	+	+	-	++	+	+	+	+	+/-	++	++	+	+
KY31/H	KY/092	-	-	-	-	-	--	-	-	-	+	+	+	+	+	+/-	++	++	+	+
KY32/H	KY/099	-	-	-	+	-	--	-	O	-	++	+	+	+	+	+/-	++	++	+	+
KY33/H	KY/101	-	-	-	+	-	--	-	O	-	++	+	+	+	+	+/-	+	++	+	+
KY34/H	KY/125	-	-	+/-	+	-	--	+	O	-	+	+	+	+	+	+/-	++	++	+	+
KY35/H	KY/133	-	-	--	-	-	--	-	-	-	+	+	-	+	+	+/-	++	+	+/-	+
KY36/H	KY/134 A	-	-	-	--	-	--	-	O	-	+	+	-	+	+	+/-	++	+	+/-	+
KY37/HC	KY/136	-	-	++	+	-	--	-	O	-	+	+	+	+	+	+/-	++	++	+	+
KY38/H	KY/138	-	-	+	+	-	--	+	O	-	+	+	+	+	+	+/-	+	++	+	+
KY39/H	KY/158	-	-	+/-	+	-	--	+	O	-	+	+	+	+	+	+/-	+	++	+	+
KY40/H	KY/159 A	-	-	-	+	-	--	-	O	-	+	+	-	+	+	+/-	++	+	+	+
KY42/HC	KY/164 A	-	-	-	+	-	--	-	-	-	+	+	-	++	+	+/-	+	+	+/-	+
KY43/H	KY/167	-	-	+/-	+	-	--	+	O	-	+	+	+	++	+	+/-	++	++	+	+
KY44/H	KY/172	-	-	+/-	+	-	--	+	-	-	++	+	+	++	+	+/-	++	+	+/-	+
KY45/HC	KY/175	-	-	-	+	-	--	-	--	-	+	+	-	+	+	+/-	+	+	+	+
KY46/H	KY/182	-	-	-	+	-	--	-	-	-	+	+	+	++	+	+/-	++	++	+	+
KY47/H	KY/183	-	-	+/-	+	-	--	-	O	-	+	+	+	+	+	+/-	+	+	+	+

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		1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
SI1/H	SI/001	-	-	--	-	-	--	-	O	-	-	+	+	+	+/-	+	+	+	+	
SI2/H	SI/004A	-	-	--	+	-	--	-	-	-	+	+	+	+/-	+	+/-	+	+	+	
SI3/H	SI/008	-	-	--	+	-	--	-	-	-	+	+	+	+	+/-	++	+	+	+	
SI4/H	SI/013	-	-	--	--	-	--	-	-	-	+	+	+	+	+/-	++	+	+/-	+	
SI5/H	SI/020	-	-	--	--	-	--	-	-	-	+	+	+	+	+/-	++	+	+	+	
SI7/H	SI/023	-	-	+	+	-	--	+	+/-	+/-	+	+	+	+	+	++	+	+	+	
SI8/H	SI/024	-	-	+	-	-	--	+	O	+/-	+	+	+	+	+	++	+	+	+	
SI11/H	SI/027	-	-	-	+	-	--	-	O	-	+	+	+	+	+/-	++	-	+	+	
ST1/H	ST/001 A	-	-	--	-	-	--	-	-	-	++	+	+	+/-	+	+	+	+/-	+	
ST2/H	ST/002	-	-	--	+	-	--	-	O	-	+	+	+	+	+/-	++	+	+/-	+	
ST3/H	ST/010 C	-	-	--	+	-	--	-	O	-	+	+	+	+	+/-	+	+	+	+	
ST4/H	ST/023	-	-	--	+	-	--	-	-	-	+	+	+	+	+/-	+	++	+	+	
Airedale Sub-Area: Employment sites																				
KY49/E	EM31	-	-	--	--	--	-	-	--	-	+	O	+	O	O	+/-	O	+	++	++
ST4/H	EM78	-	-	--	-	-	-	-	-	-	+	O	+	O	O	+/-	O	+	++	++
North-Bradford Sub-Area: Housing sites																				
NE1/H	NE/008	-	-	--	+	-	-	-	O	-	+	+	+	+	+	+/-	+	+	+	+
NE2/H	NE/013 A	-	-	+/-	+	-	--	+	O	-	+	+	+	+	+	+/-	+	+	+	+
NE3/H	NE/013 C	-	-	--	-	-	--	-	O	-	+	+	+	+	+	+/-	+	-	+	+
NE4/H	NE/025 B	-	-	--	-	-	--	-	-	-	+	+	+	+	+/-	+	++	+	+	
NE5/H	NE/031	-	-	--	+	-	-	-	-	--	++	+	+	++	+	+/-	++	++	+	+
NE6/H	NE/034	-	-	--	+	-	-	-	--	--	+	+	+	++	+	+/-	++	++	+	+
NE7/H	NE/035	-	-	+/-	+	-	+/-	+	-	--	+	+	+	+/-	+	+/-	++	++	+	+
NE8/H	NE/045	-	-	-	+	-	--	-	O	-	+	+	+	+	+	+/-	++	++	+	+
NE9/H	NE/046	-	-	+/-	+	-	--	+	O	-	+	+	+	++	+	+/-	++	+	+	+
NE10/H	NE/047	-	-	--	+	-	-	-	O	-	+	+	+	++	+	+/-	+	+	+	+
NE11/H	NE/055 b	-	-	--	+	-	--	-	-	-	+	+	+	+/-	+	+/-	++	+	+/-	+
NE12/H	NE/057	-	-	--	-	-	--	-	O	-	+	+	+	+	+	+/-	++	+	+	+
NE13/H	NE/081	-	-	+/-	+	-	+	+	O	-	+	+	+	+	+	+/-	++	++	+	+
NE14/H	NE/090	-	-	+/-	+	-	+	+	O	--	++	+	+	+/-	+	+/-	++	++	+	+
NE15/H	NE/109	-	-	-	+	-	-	-	O	--	+	+	+	++	+	+/-	++	++	+	+
NE16/H	NE/112	-	-	+/-	+	-	+	+	-	--	+	+	+	+/-	+	+/-	++	++	+	+
NE17/H	NE/113	-	-	+/-	+	-	+	+	O	--	+	+	+	+/-	+	+/-	+	++	+	+
NE18/H	NE/123	-	-	-	+	-	-	+	O	-	+	+	+	++	+	+/-	++	+	+	+
NE19/H	NE/140	-	-	--	--	-	-	-	-	-	+	+	+	+	+	+/-	++	+	+/-	+

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		1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
NE20/H	NE/163	-	-	+/-	-	-	-	+	O	-	+	+	+	+/-	+	+/-	++	++	+/-	+
NE/21 H	NE/182	-	-	+/-	+	-	-	+	O	-	+	+	+	++	+	+/-	++	+	+/-	+
North-Bradford Sub-Area: Employment sites																				
	EM90	-	-	--	--	-	-	+/-	-	-	+/-	O	+	O	O	+/-	O	+	++	++
	EM113	-	-	--	+	-	-	-	-	-	++	O	+	O	O	+/-	O	+	++	++
	NE24/E	-	-	--	+	-	-	-	-	-	+	O	+	O	O	+/-	O	+	++	++
Pennine Towns and Moors Sub-Area: Housing sites																				
TH1/H C	TH/002 A	-	-	--	+	-	--	-	O	-	+/-	+	-	+	+	+/-	+	-	+/-	+
TH2/H	TH/003	-	-	--	+	-	--	-	-	-	+	+	+/-	+	+	+/-	+	+	+/-	+
TH3/H	TH/006	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	++	+	+/-	+
TH4/H	TH/009	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	-	+/-	+
TH5/H	TH/010	-	-	--	+	-	--	-	-	-	+	+	+	+	+	+/-	+	+	+/-	+
TH6/H	TH/012	-	-	+/-	-	-	--	+	?	-	+	+	+	+	+	+/-	++	++	+	+
TH7/H	TH/018	-	-	-	+	-	--	-	-	-	+	+	-	+	+	+/-	++	+	+	+
TH8/H C	TH/027	-	-	--	-	-	--	-	-	-	+	+	-	+	+	+/-	+	-	+	+
TH9/H	TH/029	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	-	+/-	+
TH10/H	TH/033 A	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	+	+/-	+
TH11/H	TH/033 B	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	-	+/-	+
WI1/H	WI/002	-	-	+/-	-	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+	+
WI2/H	WI/005B	-	-	--	--	-	--	-	-	-	-	+	+	+	+	+/-	++	+	+	+
WI3/H	WI/013	-	-	--	-	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+/-	+
OA1/H	OA/002	-	-	--	+	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+/-	+
OA2/H	OA/007 A	-	-	--	+	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+/-	+
OX1/H	OX/003	-	-	--	--	-	--	-	-	-	+	+	+	+	+	+/-	-	+	+	+
OX2/H	OX/014	-	-	--	--	-	--	-	-	-	+	+	+	+	+	+/-	-	+	+	+
QB/001	QB/001	-	-	--	+	-	--	-	-	-	+	+	+	+/-	+	+/-	++	++	+	+
QB/002	QB/002	-	-	-	+	-	--	-	O	-	+	+	+	+/-	+	+/-	++	++	+	+
QB/004	QB/004	-	-	--	-	-	--	-	-	-	+	+	+	+/-	+	+/-	++	++	+	+
QB/007	QB/007	-	-	--	-	-	--	-	O	-	+	+	+	+	+	+/-	++	+	+	+
QB/010	QB/010	-	-	--	+	-	--	-	O	-	-	+	-	+/-	+	+/-	+	+	+	+
QB/011A	QB/011 A	-	-	--	+	-	--	-	-	-	+	+	+	+	+	+/-	++	++	+	+
QB/014A	QB/014 A	-	-	--	-	-	--	-	O	-	+	+	-	+	+	+/-	+	++	+/-	+
QB9/H	QB/035	-	-	--	+	-	--	-	O	-	-	+	-	+	+	+/-	++	++	+/-	+
QB10/	QB/036	-	-	--	+	-	-	-	O	-	-	+	-	+	+	+/-	++	++	+	+

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H																				
CU1/H	CU/001	-	-	+/-	-	-	-	+	O	-	+	+	+	+	+	+/-	++	++	+	+
CU2/H	CU/004	-	-	+/-	--	-	-	+	+	-	+	+	+	+	+	+/-	++	++	+	+
CU3/H	CU/013	-	-	--	+	-	-	-	O	-	+	+	-	+	+	+/-	+	++	+	+
DH1/H	DH/016	-	-	+/-	--	-	-	+	+/-	-	-	+	+	+	+	+/-	++	+	+	+
HA1/H	HA/001	-	-	--	+	-	-	-	O	-	+	+	-	+/-	+	+/-	+	+	+/-	+
HA2/H	HA/003	-	-	--	+	-	-	-	O	-	+	+	+	+	+	+/-	+	+	+/-	+
HA3/H	HA/004	-	-	--	+	-	-	-	O	-	+	+	+	+	+	+/-	+	+	+	+
HA4/H	HA/005	-	-	++	-	-	-	+	+	-	+	+	+	+	+	+/-	++	+	+	+
HA5/H	HA/008	-	-	-	+	-	-	-	O	-	+	+	+	+/-	+	+/-	++	+	+	+
HA6/H	HA/010	-	-	-	-	-	-	-	-	-	+	+	+	+/-	+	+/-	++	+	+	+
HR1/H	HR/004	-	-	--	-	-	-	-	-	-	+	+	-	+	+	+/-	+	+	+	+
HR2/H	HR/005	-	-	--	+	-	-	-	O	-	+	+	-	+	+	+/-	+	+/-	+	+
HR3/H	HR/006	-	-	--	+	-	-	-	-	-	+	+	-	+	+	+/-	-	+	+	+
HR4/HC	HR/012	-	-	--	+	-	-	-	O	-	+	+	-	+	+	+/-	+	+	+	+
South-Bradford Sub-Area: Housing sites																				
SE1/H	SE/001	-	-	--	+	-	-	-	O	--	+	+	+	++	+	+/-	++	++	+	+
SE2/H	SE/003	-	-	--	+	-	-	-	O	-	+	+	+	++	+	+/-	++	+	+	+
SE3/H	SE/005	-	-	+/-	-	-	-	-	O	-	++	+	+	+/-	+	+/-	--	+	+	+
SE4/H	SE/014	-	-	--	+	-	-	-	-	-	+	+	-	+	+	+/-	++	+	+	+
SE5/H	SE/015 B	-	-	--	+	-	-	-	O	--	+	+	+	+	+	+/-	++	++	+	+
SE6/H	SE/027	-	-	--	+	-	-	-	O	--	+	+	+	+	+	+/-	++	++	+	+
SE7/H	SE/030	-	-	--	+	-	-	-	O	-	+	+	+	++	+	+/-	+	++	+	+
SE8/H	SE/031	-	-	--	+	-	-	-	O	-	+	+	+/-	++	+	+/-	++	++	+	+
SE9/H	SE/032	-	-	-	+	-	-	-	O	-	+	+	+/-	++	+	+/-	++	++	+	+
SE10/H	SE/033	-	-	--	+	-	-	-	O	-	+	+	+	++	+	+/-	++	++	+	+
SE11/H	SE/035	-	-	+/-	+	-	+	+	O	--	+	+	+	++	+	+/-	++	++	+	+
SE12/H	SE/038	-	-	+/-	+	-	+	+	O	-	+	+	+	++	+	+/-	++	++	+	+
SE13/G	SE/046	-	-	--	+	-	-	-	-	-	+	+	+	+	+	+/-	++	+	+	+
SE14/H	SE/048	-	-	+/-	-	-	+/-	+	O	-	++	+	+	+	+	+/-	--	-	+	+
SE15/H	SE/050 A	-	-	--	+	-	-	-	O	-	+	+	+	++	+	+/-	++	++	+	+
SE16/H	SE/051	-	-	--	-	-	-	-	-	-	+	+	+	++	+	+/-	+	++	+	+
SE17/H	SE/054	-	-	+/-	+	-	+	+	O	-	+	+	+	++	+	+	++	++	+	+
SE18/HC	SE/055	-	-	--	-	+	-	-	-	-	-	+	+	+	+	+/-	++	+	+	+

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SE48/H	SE/057	-	-	--	+	-	-	-	O	-	-	-	+	-	+	+/-	+	-	+	+
SE45/H	SE/60	-	-	--	-	+	-	-	O	-	-	+	+	+	+	+/-	+	+	+	+
SE19/H	SE/063	-	-	--	+	-	-	-	O	-	+	+	+/-	+	+	+/-	+	++	+	+
SE20/HC	SE/069	-	-	-	-	-	-	-	O	--	-	+	-	+/-	+	+/-	+	-	+	+
SE21/H	SE/076	-	-	--	+	-	-	-	O	-	+	+	-	+	+	+/-	+	++	+	+
SE22/H	SE/079	-	-	+/-	+	-	+	+	-	-	++	+	+	+	+	+/-	--	-	+	+
SE23/H	SE/089	-	-	-	+	-	-	-	O	-	+	+	+	++	+	+/-	++	++	+	+
SE47/H	SE/099	-	-	--	+	--	-	-	-	-	-	++	-	+	+	+/-	+	-	+	+
SE46/H	SE/100	-	-	--	+	-	-	-	-	-	-	++	-	+	+	+/-	+	-	+	+
SE25/H	SE/102	-	-	--	+	-	-	-	O	-	+	+	+/-	++	+	+/-	++	++	+	+
SE27/HC	SE/111	-	-	--	-	-	-	-	O	-	+	+	+/-	++	+	+/-	++	++	+	+
SE28/H	SE/114	-	-	-	+	-	-	-	O	-	+	+	+	++	+	+/-	++	++	+	+
SE29/H	SE/118	-	-	+/-	+	-	+	+	O	-	+	+	+	+	+	+/-	++	++	+	+
SE30/H	SE/128	-	-	--	+	-	-	-	O	-	+	+	-	+	+	+/-	+	+	+	+
SE31/H	SE/137	-	-	--	+	-	-	-	-	-	+	+	+	+	+	+/-	++	+	+	+
SW1/H	SW/002	-	-	--	-	-	--	-	-	-	+	+	+	+	+	+/-	++	++	+	+
SW2/H	SW/005 B	-	-	--	+	-	--	-	O	-	+	+	+	+	+	+/-	+	-	+/-	+
SW3/H	SW/006	-	-	--	-	-	--	-	O	-	+	+	+	+	+	+/-	+	-	+	+
SW4/H	SW/007	-	-	--	+	-	--	-	O	-	+	+	+	+	+	+/-	+	-	+	+
SW5/H	SW/10A (smaller site)	-	-	--	+	+	--	-	-	-	+	+	+	+	+	+/-	++	+	+	+
SW6/H	SW/10B	-	-	--	+	-	--	-	-	-	+	+	+	++	+	+/-	++	++	+	+
SW7/H	SW/013	-	-	--	+	-	--	-	O	-	+	+	-	+	+	+/-	++	+	+	+
SW8/H	SW/017	-	-	--	-	-	--	-	O	-	+	+	-	+	+	+/-	++	+	+	+
SW9/H	SW/021 B	-	-	--	+	-	--	-	O	-	+	+	-	+	+	+/-	+	+	+	+
SW10/H	SW/022	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	+	+	+
SW11/H	SW/029	-	-	+/-	+	-	-	-	O	--	+	+	+	+	+	+/-	++	++	+	+
SW12/H	SW/031	-	-	+/-	+	-	+	+	+	--	+	+	+	++	+	+/-	++	++	+	+
SW13/H	SW/033	-	-	+/-	+	-	+/-	+	+	-	+	+	+	++	+	+/-	++	++	+	+
SW14/H	SW/034 A	-	-	--	-	-	-	-	-	-	+	+	-	+	+	+/-	+	+	+	+
SW15	SW/035	-	-	+/-	-	-	+	+	+/-	--	+	+	+	+	+	+/-	++	++	+	+

PO Ref	Site	Effect score recorded for each SA Objective																		
		1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
/H							-													
SW16 /H	SW/036	-	-	+/-	+	-	+/-	+	+	--	+	+	+	+	+	+/-	++	++	+	+
SW17 /H	SW/043	-	-	+/-	+	-	+/-	+	+	--	+	+	+	+	+	+/-	++	++	+	+
SW18 /H	SW/045	-	-	--	-	-	--	-	-	-	+	+	-	+	+	+/-	+	-	+	+
SW19 /H	SW/048 A	-	-	+/-	+	-	+	+	O	--	++	+	+	+/-	+	+/-	+	++	+	+
SW20 /H	SW/052	-	-	-	+	-	-	-	O	--	+	+	-	+	+	+/-	++	++	+	+
SW21 /H	SW/057	-	-	--	--	-	--	-	O	-	+	+	-	+	+	+/-	++	++	+	+
SW22 /H	SW/059 (part)	-	-	--	+	-	--	-	-	-	+	+	-	+	+	+/-	+	-	+	+
SW23 /H	SW/060	-	-	--	+	-	-	-	O	-	+	+	+	+	+	+/-	+	++	+	+
SW24 /H	SW/061 B	-	-	+/-	+	-	+/-	+	O	-	+	+	+	+	+	+/-	+	++	+	+
SW25 /H	SW/065	-	-	--	+	-	+	-	O	-	+	+	-	+	+	+/-	++	+	+	+
SW26 /H	SW/066	-	-	--	-	-	-	-	-	-	+	+	-	+	+	+/-	++	++	+	+
SW27 /H	SW/083	-	-	+/-	+	-	--	+	+	-	+	+	+	+	+	+/-	+	+	+	+
SW28 /H	SW/088	-	-	+/-	+	-	-	+	O	-	+	+	-	+	+	+/-	++	+	+	+
SW29 /H	SW/098	-	-	+/-	+	-	+	+	+	-	+	+	+	+	+	+/-	++	++	+	+
SW30 /H	SW/108	-	-	-	+	-	--	-	O	-	+	+	-	++	+	+/-	++	++	+	+
SW31 /H	SW/119	-	-	+/-	+	-	-	+	O	-	+	+	+	++	+	+/-	++	+	+	+
SW32 /H	SW/122	-	-	+/-	+	-	+	+	O	-	+	+	+	++	+	+/-	++	++	+	+
SW33 /H	SW/124	-	-	--	+	-	--	-	-	-	--	+	+/-	+	+	+/-	+	++	+/-	+
SW34 /H	SW/134	-	-	+/-	+	-	-	-	O	-	+	+	+	++	+	+/-	+	+	+	+
SW35 /H	SW/139	-	-	--	--	-	-	-	-	--	+	+	+	+	+	+/-	++	++	+	+
SW37 /H	SW/148	-	-	+/-	-	-	+/-	+	O	--	+	+	+	+	+	+/-	++	++	+	+
SW39 /H	SW/155	-	-	--	+	-	-	-	O	-	+	+	+	+	+	+/-	++	++	+	+
SW40 /H	SW/156	-	-	+/-	+	-	+	+	O	-	+	+	+	+	+	+/-	+	++	+	+
SW43 /H	SW/160	-	-	+/-	+	-	+	+	+	-	+	+	+	+	+	+/-	++	++	+	+
South-Bradford Sub-Area: Employment sites																				
SE29/ E	EM1	-	-	+/-	--	-	-	-	O	--	-	O	+	O	O	+	O	+	++	++
SE43/ E	EM3	-	-	--	+	-	-	-	O	-	+	O	+	O	O	+/-	O	+	++	++
SE40/ E	EM12	-	-	--	-	-	-	-	-	--	-	O	+	O	O	+/-	O	+	++	++
SE41/ E	EM14	-	-	--	+	-	-	-	O	-	+	O	+	O	O	+/-	O	+	++	++
SE32/ E	EM18	-	-	--	+	-	-	-	O	-	-	O	+	O	O	+/-	O	+	++	++

PO Ref	Site	Effect score recorded for each SA Objective																		
		1. Energy & GHGs	2. Waste	3. Land & Buildings	4. Climate change resilience	5. Water resources	6. Biodiversity & geodiversity	7. Landscape & townscape	8. Cultural heritage	9. Air quality	10. Transport	11. Housing	12. Accessible services	13. Social cohesion	14. Culture & leisure	15. Safe & secure	16. Health	17. Education	18. Employment	19. Economy
E																				
SE42/E	EM19	-	-	--	-	-	-	-	O	-	-	O	+	O	O	+/-	O	+	++	++
SE38/E	EM21	-	-	--	--	-	-	-	-	-	-	O	+	O	O	+/-	O	+	++	++
SE33/E	EM46	-	-	--	--	-	-	-	-	--	+	O	+	O	O	+	O	+	++	++
SE34/E	EM53	-	-	--	-	-	-	-	O	--	+	O	+	O	O	+/-	O	+	++	++
SE35/E	EM54	-	-	--	+	-	-	-	O	--	+	O	+	O	O	+/-	O	+	++	++
SE36/E	EM87	-	-	+/-	-	-	+	+	O	--	+	O	+	O	O	+/-	O	+	++	++
SE44/E		-	-	+	+	+/-	O	O	O	-	+/-	O	+	O	O	+/-	O	+	++	+
SE37/	SE/099	-	-	--	+	-	-	-	-	-	-	O	+	O	O	+/-	O	+	++	++
SW48/E	EM8	-	-	--	-	-	-	-	O	--	+	O	+	O	O	+/-	O	+	++	++
SW47/E	EM/112	-	-	+	-	-	-	-	-	--	+	O	+	O	O	+/-	O	+	++	++
SW47/E	SW/047	-	-	+/-	-	-	-	+	+/-	--	+	O	+	O	O	+/-	O	+	++	+
Wharfedale Sub-Area: Housing sites																				
AD1/H	AD/001	-	-	--	+	-	--	-	O	-	+	+	-	+/-	+	+/-	+	-	+	+
AD2/H	AD/002 D	-	-	-	+	-	--	-	O	-	+	+	-	+/-	+	+/-	+	-	+	+
AD3/H	AD/004 A	-	-	--	+	-	--	+/-	+/-	-	+	+	+	+/-	+	+/-	+	+	+	+
AD4/H	AD/004 B	-	-	--	+	-	--	-	-	-	+	+	+	+/-	+	+/-	+	+	+	+
AD5/H	AD/011 A	-	-	-	--	-	--	-	-	-	+	+	+	+	+	+/-	++	+	+	+
AD6/H	AD/012	-	-	--	+	-	--	-	-	-	+	+	-	+/-	+	+/-	+	-	+	+
AD7/H	AD/020	-	-	--	+	-	--	-	O	-	+	+	-	+/-	+	+/-	+	-	+/-	+
AD8/H	AD/022	-	-	+/-	-	-	--	+	+	-	+	+	+	+	+	+/-	++	+	+	+
BU1/H	BU/001	-	-	--	-	-	--	-	-	-	+	+	-	+/-	+	+/-	+	-	+/-	+
BU2/H	BU/013	-	-	--	+	-	--	-	-	-	+	+	+	+/-	+	+/-	++	+	+	+
IL1/H	IL/009	-	-	--	-	-	--	-	O	-	+	+	-	+	+	+/-	+	-	+	+
IL2/H	IL/011B	-	-	+/-	-	-	--	-	-	-	+	+	-	+/-	+	+/-	-	-	+	+
IL3/H	IL/014	-	-	--	--	-	--	-	-	-	++	+	+/-	+/-	+	+/-	-	+	+/-	+
IL4/H	IL/033	-	-	-	-	-	--	-	--	-	++	+	+	+	+	+/-	-	+	+	+
ME1/H	ME/002	-	-	--	+	-	--	-	O	-	-	+	+	+	+	+/-	++	+	+/-	+
ME2/H	ME/003	-	-	--	-	-	--	-	O	-	-	+	+	+	+	+/-	+	+	+/-	+

8 B3 & B4: Cumulative and synergistic effects

In addition to predicting and evaluating the effects of options on an individual basis, an appraisal of the likely cumulative impacts of all options in-combination has been carried out. The results of this are presented in **Table 8-1**. The SA process requires a precautionary approach to be taken, and therefore, impacts predicted to be positive typically have a high degree of probability whilst negative impacts are generally the worst-case scenario. It can often be the case that the worse-case scenario does not arise. The assessments in the appendices indicate for every option, against every SA Objective, whether the effect is considered to be of a low, medium or high probability.

Table 8-1: Cumulative and synergistic effects of the Draft Local Plan across the District as a whole

SA Objective	Cumulative and Synergistic effects
<p>Housing</p> <p>Safety and security</p> <p>Health</p> <p>Land & Buildings</p>	<p>Negative impacts</p> <p>Although there is a focus on maximising the use of suitable brownfield land and regeneration sites, there would inevitably be development growth on greenfield sites.</p> <p>There could be a risk that new development on greenfield land, which essentially introduces new homes or businesses to a location where there currently is none, introduces a new potential target of criminal activity.</p> <p>Depending on the precise location of development in relation to healthcare facilities, there could be a risk of the capacity of these facilities being placed under increasing pressure.</p> <p>A number of sites occupy Mineral Safeguarding Areas. Policy EN13 seeks to safeguard sandstone, coal and sand and gravel resources within the District from sterilisation by other forms of development.</p> <p>Some sites are an Agricultural Land Classification grade of 3 (good to moderate quality), which may include Best and Most Versatile (BMV) land.</p> <p>Positive impacts</p> <p>The preferred options in the Local Plan would be expected to ensure that everyone in Bradford has the opportunity to live in quality housing that reflects their individual needs, preferences and resources. The Council have carried out objective and robust studies into the District’s housing requirements over the Plan period and it is expected that these diverse and growing needs would be satisfied due to the preferred options of the Local Plan. In so doing, the Local Plan is predicted to help make a major contribution towards reducing homelessness, poverty, deprivation and inequality in the District. They would also be expected to help alleviate existing overcrowding issues in the District. A key aim of the Local Plan is to focus residential development in the main urban areas in the District through urban intensification. This approach will support regeneration of urban neighbourhoods, maximise existing infrastructure and make travel patterns more sustainable. Policy HO3, in particular, seeks to deliver this. Policy HO3 also seeks to ensure that urban housing schemes are high quality and that they integrate and enhance the character and quality of urban neighbourhoods.</p> <p>The Local Plan would help to ensure that existing and future residents can live secure, safe active and comfortable lifestyles at home and there are likely to be significant physical and mental health benefits to local people as a result. The Local Plan policies closely manage the density of development and this should help to ensure that development gets the correct balance between efficiently using the land resource whilst not being overpopulated or over dense to the point that the quality of life of residents is jeopardised.</p> <p>The proposed spatial distribution of new housing through HO3 maximises opportunities for using PDL and would be likely to lead to significant urban regeneration, particularly where it is needed most. The proposed distribution also makes it likely that residents would have good access to health care facilities, such as doctor’s surgeries and hospitals, due to most development being directed towards the Regional City and Principal Towns. Access to the countryside and a diverse range of natural habitats, which provides opportunities for outdoor exercise and for which spending time in is significantly beneficial to mental health, would also be likely to be very good for new residents. The Local Plan policies also seek to ensure that new development is permitted where the necessary</p>

SA Objective	Cumulative and Synergistic effects
	<p>infrastructure is available or provided for and in some cases, this would be likely to help ensure that development delivers new or expanded health care facilities and open spaces. Policies SP15, CO2, ID1 and ID2 would be highly likely to help ensure that adequate health facilities are in place to accommodate the development proposed in the Regional City, South Pennines, Airedale and Wharfedale. Policy CO3 seeks to ensure that all major development proposals positively design for creating healthy places and sets out Planning requirements in terms of Health Impact Assessments. Policy SP15 provides more detail on creating healthy places, seeking to meet local health and wellbeing needs and reduce health inequalities.</p> <p>The Local Plan seeks to improve the quantity and quality of active travel routes at new development. This is reinforced in numerous policies but is particularly strong in the Design Policies and the Transport Policies. As a result, it is highly likely that new and existing residents and employees in Bradford would have excellent opportunities for walking and cycling to access key services, facilities and amenities and it is highly likely that increased rates of active travel would contribute towards improving physical and mental health and wellbeing.</p>
<p>Energy & GHGs Air quality Transport</p>	<p>Negative impacts</p> <p>The Local Plan seeks to deliver a significant quantity of development in Bradford (although less than in the Adopted Core Strategy). It is expected that overall, the construction and occupation of 1,704 dwellings a year combined with the significant employment land could lead to a net increase in the District’s consumption of energy and the GHG emissions associated with this. There could be some degree of growth in local congestion due to the increase in residents and employees moving. There are a number of sites located within the proposed Clean Air Zone and many more adjacent to it. There is also preferred option site allocations within close proximity to AQMAs. The impacts of this would be extensively mitigated by transport and air quality policies in the Local Plan. New residents in smaller and more rural settlements where public transport options and walking or cycling routes are more limited may need to travel somewhat longer distances to access some key services or amenities.</p> <p>Negative impacts were identified for the mineral policies due to their inherent acceptance of future coal extraction and potential exploration and production of oil and gas in the District. Extracting fossil fuels from the ground and continuing to rely on them is considered to be incompatible with a climate change emergency given the severe consequences of their associated GHG emissions. It is unlikely that the impact of any future mining on the District’s carbon footprint could be entirely mitigated and there is a risk that permitted expanded or new coal, oil or gas extraction could undo the climate change mitigation efforts made elsewhere in the Local Plan. The extraction industry also gives rise to consequences for local congestion and air quality given the reliance on HGV movements for transporting minerals for at least part of their journey. Beyond GHG emissions, these extraction activities can also be a major source of noise and air pollution, including dust, PM_{2.5} and PM₁₀. It is noted that, in line with paragraph 211 of the NPPF, policy EN17 (Energy Minerals) specifies that proposals for coal extraction must be tested for their environmental acceptability. EN17 also states that any future oil and gas exploration and production will not lead to unacceptable adverse impact on people or the environment.</p> <p>Positive impacts</p> <p>The transport and movement policies are predicted to make a major contribution towards Bradford’s steady transition towards a low-emission, more efficient and more sustainable transport system where local people have a reduced need to travel and have more sustainable options travelling when they need to do so. Major improvements to the quality and capacity of bus and rail as well as walking and cycling routes are expected. The more sustainable travel facilitated by the Local Plan would have various indirect benefits for several SA Objectives, such as improving air quality, reducing carbon footprints, more cohesive communities, enhanced accessibility of key services and amenities as well as benefits for people’s health associated with higher rates of walking and cycling.</p> <p>Transport policies TR1- TR5 and TR7, as well as Strategic Core Policies SP9, SP16 and Design policies DS2, DS4 and DS5, would be likely to help ensure that walking, cycling and public transport options are improved in quality and capacity and this should help to limit increases in congestion and emissions associated with this. Coupled with EN9 on environmental protection, these policies could</p>

SA Objective	Cumulative and Synergistic effects
	<p>help to protect air quality in some locations.</p> <p>Policy EN8 seeks to tackle air pollution and improve air quality throughout the District. The policy sets out the key role that major developments are to play in this. There are also additional expectations for all major development within the proposed CAZ. It is noted in the Local Plan that further air quality modelling work is to be carried out to assess the possible effects of sites and traffic flows on areas of air quality concern, including the European Designated sites for nature conservation. The modelling will look at the effects on air quality from increased traffic as a result of the potential development of the sites selected for allocation. It will consider the impact of those effects on the European sites and the surrounding communities. This information will be used to put in place relevant mitigation measures to ensure that there are no adverse effects on the European sites. Policy EN8 is therefore likely to be updated in light of this modelling work.</p> <p>With regards to energy consumption, it is likely that SP9 and EN10 would help to facilitate the District’s transition towards an increasing reliance on renewable and low carbon sources of energy and more efficient energy networks. In addition, policy SP9 supports the provision of refuelling infrastructure for zero-emissions vehicles. Policy EN10 supports sustainable building design for both new residential and non-residential developments. Policy SP9 aims to achieve a target of net zero carbon emissions by 2038, ensuring that new development contributes to this by minimising emissions as much as possible.</p> <p>In terms of carbon sink capacity, the Local Plan proposes several policies that could help to preserve and potentially enhance the capacity in some locations. In particular, SP9, SP10, EN2, and EN3 could help to result in an increase in aboveground green infrastructure and to protect the carbon capacity of soils in some locations. It is uncertain if, over the Plan period, a net increase or a net decrease in total tree canopy could be expected.</p>
<p>Waste</p>	<p>Negative impacts</p> <p>The Housing policies (SP8 and HO1-HO10) and Economy policies (SP6 and EC1-EC4) would facilitate significant residential and business/commercial development in the District. The construction phase of this development would be likely to lead to a significant quantity of waste over the Plan-period when considered cumulatively. The occupation and operation of these homes and businesses would also be likely to generate additional quantities of waste over the Plan period and overall it could potentially become increasingly difficult to achieve a continuous decline in the amount of waste sent to landfill.</p> <p>The Minerals policies maintain an adequate supply of minerals to meet requirements of the district and wider region would facilitate the continued production of primary aggregates and minerals, including sandstone, sand, gravel, fireclay, gas, coal and oil. Policy EN11, in particular, seeks to maintain an adequate supply of minerals to meet requirements of the district and wider region. The extraction of these materials would continue the supply of primary aggregates and minerals and in the process is likely to produce large quantities of waste.</p> <p>Positive impacts</p> <p>The Local Plan proposes five policies on waste which, combined with the recently adopted Waste Management DPD, would be likely to help increase rates of reusing and recycling in the District whilst reducing the consumption of materials. In particular, it is expected that new residential and economic development would enable residents and businesses to conveniently and frequently recycle their waste. Furthermore, the distribution of development proposed in HO3 would situate the majority of new development in the Regional City and Principal Towns. In so doing, it is likely that the majority of new development would be in areas where there are established and effective kerbside collection routes for a wide range of recyclables.</p>
<p>Biodiversity</p>	<p>Negative impacts</p> <p>There is a risk that in some locations in the District, particularly where significant Green Belt release is planned or greenfield land would be used for development, there is the potential for negative impacts on ecological connectivity in the surrounding local area (although as stated above it is expected that ecological connectivity in the District would improve overall). A number of sites are located within the Natural England Green Infrastructure corridor. Development of some of the sites</p>

SA Objective	Cumulative and Synergistic effects
	<p>could potentially directly or indirectly affect priority habitat, Tree Preservation Order (TPO) woodland and Ancient Woodland. The loss of soils as a result of development on greenfield land would also pose a threat to below-ground biodiversity and the land’s ability to support above-ground wildlife.</p> <p>The HRA report (i.e. the Screening process) of the Local Plan has not been able to objectively rule out LSEs on the South Pennine Moors SAC/SPA, primarily as a result of the cumulative impact of proposed development growth in terms of recreational disturbances at the designation, impacts on supporting habitat/functionally-linked land, air quality and urban effects. There are also a small number of sites that could give rise to LSEs on the North Pennine Moors SAC/SPA via recreational activities, these sites are mostly located in Ilkley and Addingham, both in Wharfedale.</p> <p>Preliminary checks undertaken in as part of the HRA process highlight a number of road sections that cross the South Pennine Moors SAC/SPA and the North Pennine Moors SAC/SPA. In order to rule out adverse effects on integrity in future iterations of the HRA it will be necessary to understand how traffic flows will change on these road sections.</p> <p>Whilst LSEs have not yet been able to be ruled out, the HRA appropriate assessment sets out appropriate mitigation measures for inclusion in the Local Plan that will ultimately ensure an LSE does not arise. The HRA report also advises on the nature of further assessment to be undertaken prior to the next iteration of the HRA.</p> <p>Positive impacts</p> <p>Planning for Places and Communities policies would be expected to help ensure that new development over the Plan period delivers cleaner and greener spaces as well as high-quality GI elements that are of a high biodiversity value. The Local Plan recognises the importance of protecting designated biodiversity sites as well as ecological connectivity at an international and local scale. Policy SP10 also seeks to ensure that development proposals identify opportunities to link areas of green space together in order to fill gaps within the existing Green Infrastructure network. Policy EN2 ensures that all development (except householder applications) delivers a measurable net gain in biodiversity value compared with the pre-development baseline. Overall, the Local Plan seeks to promote the protection, enhancement, restoration and expansion of biodiversity in the district and expects development proposals to make a positive contribution to the provision of Green Infrastructure and support its multi-functionality.</p>
<p>Water resources</p> <p>Flooding</p> <p>Climate change resilience</p>	<p>Negative impacts</p> <p>The significant residential and economic growth would be likely to lead to some degree of increase in total water consumption in the District.</p> <p>Whilst the Local Plan focuses PDL and regeneration, in some areas of the District there would be significant losses of greenfield land and potentially an increase in impermeable ground, in part due to the circa 5,500 homes directed towards the Green Belt (although this is less than half the 11,000 homes directed towards Green Belt and in the Adopted Core Strategy as well as reasonable alternatives identified during the Local Plan process). In many cases, the development could be in proximity to natural waterbodies (including ground water). The construction phase could subsequently pose a pollution or contamination risk to waters, such as at the Rivers Aire, Wharfe and Bradford Beck, although this would mostly be mitigated or avoided as a result of Policy EN9.</p> <p>Given the presence of flood zones, including Flood Zone 3, in the Wharfedale corridor, it would require careful testing of land supply to ensure that new housing here can all be situated in Flood Zone 1 although early indications are that this would be achievable.</p> <p>There are sites which include areas of low, medium and/or high surface water flood risk. Policy EN7 seeks to ensure that surface water flood risk (as well as other types of flood risk) is addressed, and allowances are made for the potential impacts of climate change.</p> <p>Positive impacts</p> <p>The Local Plan recognises the need for protecting local water resources as well as the quality of natural water bodies (including ecological and chemical statuses). Several policies in the Local Plan seek to ensure that development in the District is sustainable and it is expected that this would include water efficiency measures. SP9 encourages the minimisation of water consumption and</p>

SA Objective	Cumulative and Synergistic effects
	<p>maximising the use of water recycling and SuDS. Policy EN9 aims to manage water demand and improve water efficiency through the use of appropriate measures including rainwater harvesting and grey-water recycling. Policy EN21 seeks to ensure that buildings as part of new waste developments include water efficient design.</p> <p>There are also several policies in the Local Plan which, combined, would be likely to help minimise the risk of development polluting or contaminating water. This is particularly the case with EN9 on environmental protection. Policy EN9 states that proposals for development will only be acceptable where there is no adverse impact on water bodies and groundwater resources, in terms of their quantity, quality and the important ecological features they support.</p> <p>With regards to flood risk, the spatial distribution of development proposed in the Local Plan would be likely to help ensure that the majority of new development can be directed away from land at risk of flooding.</p> <p>The Local Plan maximises opportunities for using PDL land with significant urban regeneration a key ambition. As a result, greenfield and Green Belt land is avoided as much as is considered to be feasible. In so doing, this strategy would help to limit potential impacts water quality caused by new development on greenfield sites through pollution or contamination impact pathways.</p>
<p>Landscape and townscapes</p> <p>Cultural heritage</p>	<p>Negative impacts</p> <p>Overall, the quantum of development proposed in the Local Plan would alter the local character and sense of place in some locations of the District. This is a particular risk where new development would be situated on open space, greenfield and the Green Belt as well as where large development sites are situated in smaller and rural settlements such as Local Service Centres. However, in other cases, the proposed growth will improve previously developed/brownfield sites. The key is to focus growth as much as possible on previously developed land where appropriate, and minimise adverse effects through careful design and following relevant Local Plan policies.</p> <p>A number of potential housing sites in North Bradford and Airedale fall within the Saltaire World Heritage Site Buffer Zone. In line with policy EN4, development proposals within the boundary of Saltaire World Heritage Site or within its Buffer Zone would be required to demonstrate that they will conserve those elements which contribute towards its Outstanding Universal Value (OUV), including its setting and key views.</p> <p>Some sites in Wharfedale are within 2km of Nidderdale Area of Outstanding Natural Beauty (AONB) and the Yorkshire Dales National Park. Overall, however, development would not be expected to have a discernible impact on or alter views into or out of the AONB or the National Park, largely due to the presence of intervening built form.</p> <p>Positive impacts</p> <p>The Local Plan seeks to ensure that opportunities for reusing PDL and regenerating urban brownfield sites are maximised. Development at these locations would need to accord with the environment and design policies in the Local Plan. Overall, it is expected that the character and setting of urban areas throughout the District would be protected and enhanced. New development would be of a high-quality design that pays respect to the local character and setting. Overall, it is expected that the Local Plan would make a major positive contribution towards maintaining, protecting and enhancing the character of Bradford whilst also conserving and enhancing the significance of the District's heritage assets and historic areas.</p> <p>Policy EN6 aims to protect the countryside and manage development in a way that supports rural communities and the rural economy whilst maintaining its essential attributes.</p>
<p>Accessible services</p> <p>Social cohesion</p> <p>Culture and leisure</p>	<p>Negative impacts</p> <p>Depending on the precise location of development there could potentially be a minor risk of the capacity of existing services being placed under increasing pressure in the absence of new or expanded services being provided for. It is assumed that capacity would need to increase to serve such areas, either within existing facilities or as part of new facilities provided as part of the delivery of larger sites (e.g. the SUE sites).</p>

SA Objective	Cumulative and Synergistic effects
	<p>Positive impacts</p> <p>Overall, the proposed distribution of development would be expected to make a major positive contribution towards improving the range and quality of services within communities in Bradford and the connectivity of these services to wider networks. The Local Plan would also be expected to help ensure that Bradford’s community becomes increasingly cohesive with an improvement to people’s quality of life and the quality of their neighbourhoods. The cultural, recreational and leisure offering in the District would also be likely to improve.</p> <p>Transport policies in the Local Plan would help to encourage greater rates of walking and cycling whilst residential development would be likely to be permeable and to incorporate outdoor amenity space as a result of the Design policies and this would enable outdoor socialising and regular interactions between neighbours. The accessibility of services, social areas and cultural places would be likely to improve whilst in some locations the development proposed and distribution in SP8 and HO1 could enable the provision of new such spaces.</p> <p>It is also important to note that most new residents in Bradford would be likely to live in settlements with existing good public transport links that provide them with frequent, affordable and sustainable access to Bradford as well as Leeds where the range of services, facilities and recreation space is excellent.</p> <p>The Local Plan seeks to directly enhance the leisure, culture and services offering in the District. The Economy themed policies encourage entrepreneurship that would be likely to enable new such businesses to start-up. Policies SP6 and EC1-EC4 specifically refer to encouraging economic enterprises that would benefit these SA Objectives. This could be particularly beneficial for Local Growth Centres or Local Service Centres where the range of such businesses is somewhat more limited than in the Regional City.</p>
<p>Education</p> <p>Employment</p> <p>Economy</p>	<p>Negative impacts</p> <p>Depending on the precise location of development in relation to education facilities, there could potentially be a risk of the capacity of some schools being placed under increasing pressure.</p> <p>Positive impacts</p> <p>The Local Plan would be expected to make a significant contribution towards promoting education and training in Bradford. Supporting the University and the colleges and schools in Bradford is a Strategic Objective of the Local Plan.</p> <p>The distribution of development proposed in SP8 and HO1 would be highly likely to ensure that the majority of new residents live in a settlement with excellent education opportunities. Policies SP3, SP8 and HO1 would be likely to ensure that new homes have good access to primary and secondary schools. For example, policy SP8 shall ensure that the right infrastructure will be delivered at the right time to support housing growth and sustainable communities, including the provision of education. Additionally, SP6 seeks to ensure that the local economy is knowledge-driven by supporting the potential of the University of Bradford, Bradford College and other higher education facilities.</p> <p>The significant economic and employment development proposed in the Local Plan would also be likely to enhance on-the-job skills learning opportunities for local people. Enhancements to the local knowledge industry as well as improved qualifications for local people would provide a major boost to the Council’s efforts to regenerate the local economy by increasing the pool of potential high-quality employees.</p> <p>The Council has objectively calculated the potential growth in employment needs in the District and planned to deliver an adequate supply of employment land for support this. The economic policies in the Local Plan are predicted to contribute towards major economic regeneration throughout the District with significant growth in jobs (1,600 jobs per annum), a change to the nature of employment, significant growth in key markets that have been identified by the Council and major improvements to the skills learning opportunities for local people. Start-up rates would be likely to increase with entrepreneurship, which is already particularly high in Bradford compared with other local authorities, strongly supported and encouraged by the Council. This employment land would generally be in locations that are highly accessible for all people via all modes of transport. The Sub-area policies</p>

SA Objective	Cumulative and Synergistic effects
	<p>would be expected to help ensure that employment needs and economic opportunities at a local level are satisfied and maximised.</p> <p>Overall, it is expected that the Local Plan would make a significant contribution towards increasing the number of high-quality job opportunities suited to the needs of the local workforce and supporting investment and enterprise that respects the needs of local areas.</p>

9 B5: Recommendations

Mitigation involves putting in place measures to prevent, reduce or offset any identified adverse sustainability effects. Measures may also include recommendations for enhancing positive effects. The first priority should, however, be avoidance of adverse effects. Only when all alternatives that might avoid an adverse effect have been exhausted, should mitigation be sought to reduce the harmful effect.

Appendices D, E and F include the recommendations that have been made in the SA for each policy presented in the Local Plan. These will be updated over time as the SA continues to make recommendations leading up to publication of the Plan.

Recommendations have only been made for policies under review. It is considered that the Council would be unlikely to have the opportunity to make fundamental changes to policies that are not under review.

10 Next steps

10.1 Stage B: Development Alternatives and Assessing Effects

The SA process accompanying the preparation of the Local Plan completed the SA Scoping (Stage A) in April 2019. This Interim SA Report is a component of Stage B of the SA process and is intended to accompany the 2021 Regulation 18 consultation on the Local Plan. The SA will continue to assist with the refining and defining of options by predicting and evaluating the sustainability impacts of options, alternatives and providing recommendations in an iterative process with the Council.

10.2 Stage C: Prepare Sustainability Appraisal Report

This is an Interim SA Report to accompany Regulation 18 consultation on the Local Plan. This will be refined and defined to become the SA Report accompanying Regulation 19 Consultation on the Local Plan. Following this, the SA Report will be updated in line with stakeholder responses received during consultation as well as any changes made to the Local Plan. The SA Report will then accompany submission of the Local Plan to the SoS for Examination.

It is necessary for the final SA Report to satisfy the requirements of an 'environmental report' as per the SEA Regulations. Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the formal requirements of an 'environmental report', as per the below.

Environmental Assessment of Plan and Programmes Regulations 2004

Preparation of the environmental report – Regulation 12

- 1) *Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.*
- 2) *The report shall identify, describe and evaluate the likely significant effects on the environment of–*
 - a. *implementing the plan or programme; and*
 - b. *reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.*
- 3) *The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of–*
 - a. *current knowledge and methods of assessment;*
 - b. *the contents and level of detail in the plan or programme;*
 - c. *the stage of the plan or programme in the decision-making process; and*
 - d. *the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.*
- 4) *Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other Community legislation.*
- 5) *When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.*
- 6) *Where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks beginning with the date on which it receives the responsible authority's invitation to engage in the consultation.*

10.3 Stage D: Consultation on Sustainability Appraisal Report

The SA of the Local Plan is expected to be consulted on a number of times, including (as a minimum) the consultation on the SA Scoping report that concluded in 2019; the Regulation 18 consultation on the Local Plan; and the Regulation 19 consultation on the Local Plan. Stakeholders consulted on include, as a minimum, the general public, the statutory bodies of Natural England, Historic England and the Environment Agency, as well as other relevant bodies the Council sees value in consulting. Following each round of consultation, responses received from stakeholders are closely reviewed and the SA Report is amended as appropriate. The responses that are received relevant to the SA are included in the appendices of the SA Reports alongside a summary of how and why the SA Report has been, or has not been, amended as a result.

Responses received during consultation on the SA Scoping report and a summary of how and why the SA Report has been, or has not been, amended as a result of each comment is provided in **Appendix C**.

Each round of consultation on the SA Report is a component of Stage D of the SA Process. Each round would also be expected to lead to some changes to the Local Plan as a result of stakeholder feedback and the SA Report will be updated and amended to reflect these changes.

10.4 Stage E: Reporting and Monitoring

Monitoring, and reporting on the monitoring process, is an essential element of SA to ensure that the effects of the Local Plan, as well as the efficacy of adopted mitigation or avoidance measures, conform with the predictions and evaluations in SA. It is expected that the monitoring and reporting will be carried out by the Council, likely incorporated into existing monitoring commitments such as the Authority Monitoring Report (AMR). Should unanticipated effects be identified, the proactive monitoring and reporting approach enables the Council to take appropriate remedial actions. This will be developed in the next iterative stage of the SA, once the predicted significant effects of the next iteration of the Local Plan have been refined.

APPENDIX A

Summary of the PPP Review

As part of Stage A, the Scoping stage, of the SA process, a review of plans, policies and programmes (PPPs) was carried out to identify key objectives, messages, targets and indicators relevant to the Bradford Local Plan and its SA. results of this process is presented in **Table A.1**.

Table A.1: Summary of PPP review

Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
INTERNATIONAL POLICIES		
<p>World Commission on Environment and Development (1987) Our Common Future (The Brundtland Report) The Brundtland Report is concerned with the world’s economy and its environment. The objective is to provide an expanding and sustainable economy while protecting a sustainable environment. The Report was in response to a call by the United Nations which sought:</p> <ul style="list-style-type: none"> - To propose long-term environmental strategies for achieving sustainable development by the year 2000 and beyond; - To recommend ways in which the environment may be translated into greater co-operation among countries of the global South and between countries at different stages of economic and social development and lead to the achievement of common and mutually supportive objectives that take account of the interrelationships between people, resources, environment and development; - To consider ways and means by which the international community can deal more effectively with environmental concerns; - To help define shared perceptions of long-term environmental issues and the appropriate efforts needed to deal successfully with the problems of protecting and enhancing the environment, a long term agenda for action during the coming decades, and aspirational goals for the world community. 	<p>The report issued a multitude of recommendations with the aim of attaining sustainable development and addressing the problems posed by a global economy that is intertwined with the environment.</p>	<p>The Brundtland Report provided the original definition of sustainable development. The accumulated effects of the SA Objectives seek to achieve sustainable development. Sustainable development is a central feature of the National Planning Policy Framework.</p>
<p>Kyoto Protocol on Climate Change (1997) and 2015 Paris Climate Change Agreement The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialised countries and the European community for reducing greenhouse gas emissions. These amount to an average of five per cent against 1990 levels over the five-year period 2008-2012. The Kyoto Protocol is influential to achieving sustainable development as it encourages transition to a low carbon economy. Therefore, it is an integral</p>	<p>Under the Kyoto Protocol (1997), the UK committed to reduce its greenhouse gas emissions to 12.5% below 1990 levels by 2008-2012, and to achieve a 20% reduction in CO2 emissions below 1990 levels by 2010. The Protocol was a precursor to the 2015 Paris Climate Change Agreement under which virtually every country, including all major carbon-emitting economies, pledged to constrain their greenhouse gas emissions, with the aim of keeping global warming well below two degrees Celsius. Governments also agreed measures to help poor nations</p>	<p>Policy(s) relating to climate change should seek to reduce the emission of greenhouse gases and ensure that the effects of climate change are taken into account. The SA should take into consideration the targets of the Kyoto Protocol and SA Objectives / decision making criteria relating to reducing the emission of greenhouse gases should be included</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
factor in planning documents.	protect themselves against climate impacts, and the outline of a system for monitoring and verifying countries' compliance with their pledges.	within the SA framework.
<p>Johannesburg Declaration on Sustainable Development (United Nations, 2002) The World Summit on Sustainable Development proposed broad scale principles which should underlie sustainable development and growth. It includes objectives such as:</p> <ul style="list-style-type: none"> - Greater resource efficiency (including decoupling economic growth from environmental degradation); - Support business innovation and take-up of best practice in technology and management; - New technology development; and - Technology demonstration and risk limitation. 	<p>There are a number of follow up processes (e.g. "significantly" reduce rate of loss of biodiversity by 2010, but no specific targets.</p>	<p>The plan should take account of the underlying sustainable development principles and seek to reflect these in policies. The SA should include objectives / decision making criteria that reflect the principles and objectives arising from the World Summit</p>
<p>Aarhus Convention (United Nations Economic Commission for Europe, 2001) The Aarhus Convention creates obligations in three fields or 'pillars':</p> <ul style="list-style-type: none"> - Public access to environmental information; - Public participation in decision-making on matters related to the environment; and - Access to justice (i.e. administrative or judicial review proceedings) in environmental matters. 	<p>No target or indicators. It lays down a set of basic rules to promote the involvement of citizens in environmental matters and improve enforcement of environmental law. It does include specific targets or indicators but there is a compliance committee which reviews compliance with the Convention.</p>	<p>The Council should ensure that the public are given adequate opportunity to contribute towards, and participate in the decision making process for the local plan documents. All local plan documents to be made publicly available. Consultation on the SA should be undertaken in accordance with SA / SEA regulations, giving both statutory consultees and the public opportunities to comment on the SA.</p>
<p>The Convention on Biological Diversity, Rio de Janeiro (1992) The main driver of the SEA Directive. Article 6a requires each Contracting Party to develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity.</p>	<p>Ensure that the plan does not Support development that threatens designated biodiversity sites.</p>	<p>SA should consider biodiversity impacts within its objectives. It should take a holistic view of ecosystems rather than a focusing on islands of protected species.</p>
<p>World Health Organisation Guideline Values (World Health Organisation, 1996) The World Health Organisation sets guideline values for healthy noise levels.</p>	<p>Between 23.00 and 07.00 hours, noise levels should not exceed 30 dB LAeq to allow undisturbed sleep. Outdoor noise levels of 50 dB should not be exceeded between 07.00 and 23.00, in order to prevent people being 'moderately annoyed'.</p>	<p>The plan should take into consideration the guidelines on healthy noise levels.</p>
<p>UNESCO World Heritage Convention Convention Concerning the protection of the world's cultural and natural heritage.</p>	<p>Noting that the cultural heritage and the natural heritage are increasingly threatened with destruction not only by the traditional causes of decay, but also by changing social and economic conditions which aggravate the situation</p>	<p>The Bradford Local Plan should conform with the requirements of the UNESCO World Heritage Convention, particularly with the World Heritage Site Saltaire</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
	with even more formidable phenomena of damage or destruction. Deterioration or disappearance of any item of the cultural or natural heritage constitutes a harmful impoverishment of the heritage of all the nations of the world. It is essential for this purpose to adopt new provisions in the form of a convention establishing an effective system of collective protection of the cultural and natural heritage of outstanding universal value, organized on a permanent basis and in accordance with modern scientific methods,	Village.
EUROPEAN POLICIES		
<p>European Spatial Development Perspective (1999) European cultural landscapes, cities and towns, as well as a variety of natural and historic monuments are part of the European heritage. Its fostering should be an important part of modern architecture, urban and landscape planning in all regions of the European Union. A big challenge for spatial development policy is to contribute to the objectives, announced by the European Union during international conferences concerning the environment and climate, of reducing emissions into the global ecological system.</p>	<p>No specific target or indicators. The key indicator for assessing this policy is ‘Land take’. It looks at the change in the amount of agricultural, forest and other semi-natural and natural land taken by urban and other artificial land development. The drivers of land take are extensions of: housing, services and recreation; industrial and commercial sites; transport networks and infrastructure; mines, quarries and waste sites. There are no quantitative targets for land take for urban development at the European level.</p>	<p>Local plan should support the goals of the Spatial Development Perspective and seek to incorporate these in the policy framework. The SA should take account of the goals of the Spatial Development Perspective and SA Objectives / decision making criteria relating to protecting cultural heritage, biodiversity and landscape character and reducing climate change impacts should be included within the SA framework.</p>
<p>European Biodiversity Strategy to 2020 (COM(2011) 244)</p> <ul style="list-style-type: none"> - Protect species and habitats - Maintain and restore ecosystems - Achieve more sustainable agriculture and forestry - Making fishing more sustainable and seas healthier - Combat invasive alien species - Help stop the loss of global biodiversity 	<p>By 2020, the assessments of species and habitats protected by EU nature law show better conservation or a secure status for 100% more habitats and 50% more species By 2020, ecosystems and their services are maintained and enhanced by establishing green infrastructure and restoring at least 15% of degraded ecosystems.</p>	<p>Local Plan should include a policy/ policies relating to biodiversity, which seek to ensure its protection and enhancement. The SA should take into consideration the main themes of the Biodiversity Strategy and seek to reflect these in the SA Objectives / decision making criteria.</p>
<p>European Commission White Paper on the European Transport Policy (European Commission, 2001) The White Paper on European Transport Policy proposes the following principal measures:</p> <ul style="list-style-type: none"> - Revitalising the railways; - Improving quality in the road transport sector; - Striking a balance between growth in air transport and the environment; - Turning inter-modality into reality; 	<p>No target or indicators.</p>	<p>Local Plan should include policy(s) / relating to the provision of a safe and reliable sustainable transport network, taking into consideration the White Paper measures. The SA should take into consideration the White Paper measures and SA Objectives /decision making criteria relating to the provision of high quality,</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<ul style="list-style-type: none"> - Improving road safety; - Adopting a policy on effective charging for transport; - Recognising the rights and obligations of users; - Developing high quality urban transport; and - Developing medium and long-term environmental objectives for a sustainable transport system. 		<p>integrated and sustainable transport systems, and improving road safety should be included within the SA framework.</p>
<p>European Commission Air Quality Framework Directive 96/62/EC (European Commission, 1996) The Air Quality Framework Directive sets a framework for the monitoring and reporting of ambient levels of air pollutants.</p>	<p>The Directive includes mandatory limits or reductions for 11 air pollutants including: sulphur dioxide, nitrogen dioxide, particulate matter, lead, ozone, benzene, carbon monoxide, poly-aromatic hydrocarbons, cadmium, arsenic, nickel and mercury.</p>	<p>Local Plan should include a policy relating to air quality, which reflects the requirements of the Directive. The SA should take into consideration the aim of the Directive and SA Objectives / decision making criteria relating to reducing the emission of air pollutants and improving air quality should be included within the SA framework.</p>
<p>Environment 2010: Our Future, Our Choice (EU Sixth Environment Action Programme) (European Commission, 2001) The latest Environment Action Programme gives a strategic direction to the Commission’s environmental policy over the next decade, as the Community prepares to expand its boundaries. The new programme identifies four environmental areas to be tackled for improvement:</p> <ul style="list-style-type: none"> - Climate change; - Nature and biodiversity; - Environment, health and quality of life; and - Natural resources and waste. 	<p>No target or indicators.</p>	<p>Local Plan should include policies relating to the four environmental areas highlighted in the Environment Action Programme. The SA should take into consideration the outcomes of the Environment Action Programme and SA Objectives / decision making criteria relating to climate change, biodiversity, health and quality of life, natural resources and waste should be included within the SA framework.</p>
<p>Directive on the assessment of the effects of certain plans and programmes on the environment (2001/42/EC), EU (2001) The SA Directive adopted in 2001 specifically requires the consideration of “the likely significant effects on the environment, including on issues such as ..., human health” (European Parliament and the Council of the European Union, 2001). The SA Protocol (United Nations Economic Commission for Europe, 2003) implements the political commitments made at the Third European Conference on Environment and Health and uses the term ‘environment and health’ throughout. It indicates that health authorities should be consulted at the different stages of the process and so goes further than the SA Directive. Once ratified, it will require changes to the SA Directive to require that health authorities are statutory consultees.</p>	<p>No target or indicators.</p>	<p>The SA should take into consideration this directive.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>A Resource-Efficient Europe – Flagship Initiative Under the Europe 2020 Strategy Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions (COM 2011/21)</p> <p>This flagship initiative aims to create a framework for policies to support the shift towards a resource-efficient and low-carbon economy which will help to:</p> <ul style="list-style-type: none"> - boost economic performance while reducing resource use; - identify and create new opportunities for economic growth and greater innovation and boost the EU's competitiveness; - ensure security of supply of essential resources; and - fight against climate change and limit the environmental impacts of resource use. 	<p>No target or indicators.</p>	<p>Local Plan should include policies which seek encourage resource efficiency and a low carbon economy.</p>
<p>European 7th Environmental Action Programme to 2020: Living well, within the limits of our planet (November 2013)</p> <p>The programme lists nine priority objectives and what the EU needs to do to achieve them by 2020. They are:</p> <ul style="list-style-type: none"> - to protect, conserve and enhance the Union's natural capital - to turn the Union into a resource-efficient, green, and competitive low-carbon economy - to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing - to maximise the benefits of the Union's environment legislation by improving implementation - to increase knowledge about the environment and widen the evidence base for policy - to secure investment for environment and climate policy and account for the environmental costs of any societal activities - to better integrate environmental concerns into other policy areas and ensure coherence when creating new policy - to make the Union's cities more sustainable - to help the Union address international environmental and climate challenges more effectively 	<p>No target or indicators.</p>	<p>Local Plan should include policies which seek encourage resource efficiency and a low carbon economy.</p>
<p>European Water Framework Directive (2000/60/EC)</p> <p>The Water Framework Directive establishes a framework for the protection of inland surface waters, transitional waters, coastal water and groundwater. It also encourages the sustainable use of water resources. The Directive has the following key aims:</p> <ul style="list-style-type: none"> - Expanding the scope of water protection to all waters, surface waters and groundwater; 	<p>The Directive requires all Member States to achieve 'good ecological status' of inland water bodies by 2015, and limits the quantity of groundwater abstraction to that portion of overall recharge not needed by ecology.</p>	<p>Local Plan should include a policy that ensures the protection of ground and surface waters, reflecting the aims of the Water Framework Directive. The SA should take into consideration the aims of the Water Framework Directive and SA Objectives / decision</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<ul style="list-style-type: none"> - Achieving "good status" for all waters by a set deadline; - Water management based on river basins; - "Combined approach" of emission limit values and quality standards; - Getting the prices right; - Getting the citizen involved more closely; and - Streamlining legislation. 		<p>making criteria relating to protecting ground and surface water from pollution, enhancing water quality and ensuring the sustainable use of water resources should be included within the SA framework.</p>
<p>European Waste Framework Directive (2008/98/EC) Sets the basic concepts and definitions related to waste management. The Directive lays down some basic waste management principles: it requires that waste be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest</p>	<p>It incorporates provisions on hazardous waste and waste oils, and includes two new recycling and recovery targets to be achieved by 2020: 50% preparing for re-use and recycling of certain waste materials from households and other origins similar to households, and 70% preparing for re-use, recycling and other recovery of construction and demolition waste</p>	<p>SA process and therefore the Local Plan Review should seek to minimise waste, and the environmental effects caused by it. Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include sustainability objectives that minimise waste production as well as promote recycling.</p>
<p>European Habitats Directive (92/43/EEC) The Habitats Directive provides for the creation of a network of protected areas across the European Union to be known as 'Natura 2000' sites. This network includes SACs and SPAs. Member states should maintain or restore in a favourable condition these designated natural habitat types. If a project compromising one of these habitats must proceed in spite of negative conservation impacts due to it being in the public interest, compensatory measures must be provided for. Linear structures such as rivers/streams, hedgerows, field boundaries, ponds, etc., that enable movement and migration of species should be preserved.</p>	<p>No target or indicators.</p>	<p>Local Plan should include a policy which reflects the requirements of the Habitats Directive – the policy should afford protection to Natura 2000 sites and highlight the requirement to undertake HRA. The SA should take into consideration the aims of the Habitats Directive and an SA Objective / decision making criteria relating to the protection of Natura 2000 sites should be included within the SA framework.</p>
<p>European Directive on the conservation of Wild Birds (2009/147/EC) (codified version)</p> <ul style="list-style-type: none"> - The maintenance of the populations of all wild bird species across their natural range with the encouragement of various activities to that end. - The identification and classification of Special Protection Areas (SPAs) for rare or vulnerable species, as well as all regularly occurring migratory species. - The establishment of a general scheme of protection for all wild birds 	<p>No target or indicators.</p>	<p>SA should seek to protect and enhance wild bird populations, including the protection of SPAs.</p>
<p>European Directive on Ambient Air Quality (2008/50/EC) The 2008 ambient air quality directive (2008/50/EC) sets legally binding</p>	<p>No targets or indicators. Key elements include:</p>	<p>Develop policies that meet standards of air quality.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). As well as having direct effects, these pollutants can combine in the atmosphere to form ozone, a harmful air pollutant (and potent greenhouse gas) which can be transported great distances by weather systems.</p>	<ul style="list-style-type: none"> - New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives–exposure concentration obligation and exposure reduction target - The possibility to discount natural sources of pollution when assessing compliance against limit values - The possibility for time extensions of three years (PM10) or up to five years (NO2 , benzene) for complying with limit values, based on conditions and the assessment by the European Commission. 	<p>SA should consider the maintenance of good air quality and the measures that can be taken to improve it through, for example, an encouragement to reduce vehicle movements.</p>
<p>European Directive on Renewable Energy (2009/28/EC) The Renewable Energy Directive establishes an overall policy for the production and promotion of energy from renewable sources in the EU.</p>	<p>It requires the EU to fulfil at least 20% of its total energy needs with renewables by 2020 – to be achieved through the attainment of individual national targets. All EU countries must also ensure that at least 10% of their transport fuels come from renewable sources by 2020. On 30 November 2016, the Commission published a proposal for a revised Renewable Energy Directive recommending that the target of at least 27% renewables in the final energy consumption in the EU by 2030 is met.</p>	<p>The need to ensure that energy efficiency forms part of the mitigation strategy to reduce the impact of climate change upon the environment.</p>
<p>Waste Framework Directive (2008/98/EC) The Waste Framework Directive requires Member States to establish a network of disposal facilities and competent authorities with responsibility for issuing waste management authorisations and licenses. Member States may also introduce regulations which specify which waste recovery operations and businesses are exempt from the licensing regimes and the conditions for those exemptions. An important objective of the Waste Framework Directive is to ensure the recovery of waste or its disposal without endangering human health and the environment. Greater emphasis is also placed on the prevention, reduction, re-use and recycling of waste. Article 4 states that Member States shall take the necessary measures to ensure that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment, and in particular: without risk to water, air, soil and plants and animals; without causing a nuisance through noise or odours; and without adversely affecting the countryside or places of special interest.</p>	<p>No specific target or indicators relating to Local Plan policies. Targets relate to minimum weights of waste to be recycled by 2020.</p>	<p>Policy(s) for sustainable waste management should place emphasis on the prevention, reduction, re-use and recycling of waste, and seek to ensure no adverse environmental or social impacts arise from waste management. The SA should take into consideration the Waste Framework Directive and SA Objectives / decision making criteria that promote the management of waste in accordance with the waste hierarchy should be included</p>
<p>European Directive on Urban Wastewater Treatment (9/271/EEC) Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors</p>	<p>No specific target or indicators relating to Local Plan policies</p>	<p>The plan should take account of the underlying sustainable development principles and seek to reflect these in</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
		<p>policies. The SA should include objectives / decision making criteria that reflect the principles and objectives arising from the Directive.</p>
<p>European Noise Directive (2002/49/EC) Preventing and reducing environmental noise where necessary and preserving environment noise quality where it is good.</p>	<p>No target or indicators. It is for Member states to consider the setting of targets and prescribed measures in their action plans.</p>	<p>The plan should take account of the underlying sustainable development principles and seek to reflect these in policies. The SA should include objectives / decision making criteria that reflect the principles and objectives arising from the Directive</p>
<p>European Landscape Convention (Florence Convention) (March 2017) The convention promotes landscape protection, management and planning.</p>	<p>No indicators or targets. Highlights the need to recognise landscape in law, to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies.</p>	<p>Ensure that site allocations and policies take account of the Convention. Include sustainability objectives to protect the archaeological heritage.</p>
<p>The Convention for the Protection of the Architectural Heritage of Europe (Valette Convention) Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater. Creation of archaeological reserves and conservation of excavated sites.</p>	<p>No indicators or targets The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. Objectives include: <ul style="list-style-type: none"> - The inventory and protection of sites and areas - Promoting high standards for all archaeological work - The creation of archaeological reserves - The protection and recording of archaeology during development. </p>	<p>Ensure that site allocations and policies take account of the Convention. Include sustainability objectives to protect the archaeological heritage.</p>
<p>Energy Performance of Buildings Directive (2002/91/EC) Promotes the energy performance of buildings within the European Community, taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness. The main points of the directive are as follows: <ul style="list-style-type: none"> - When buildings are advertised for sale or rent, energy performance certificates are to be included. - Larger public buildings must display a Display Energy Certificate (DEC). - Inspection schemes must be established for heating and air conditioning systems or measures put in place with equivalent effect. </p>	<p>The directive requires all new buildings to be nearly zero energy buildings by 31 December 2020</p>	<p>Ensure that site allocations and policies take account of the guidance of the directive. Include sustainability objectives to promote energy efficiency in building and related land use.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<ul style="list-style-type: none"> - All new buildings must be nearly zero energy buildings by 31 December 2020 (public buildings by 31 December 2018). - EU countries must set minimum energy performance requirements for new buildings, for buildings that undergo major renovations and for the replacement or retrofit of building elements (heating and cooling systems, roofs, walls, etc.). - EU countries have to draw up lists of national financial measures to improve the energy efficiency of buildings. 		
<p>European Union (EU) Strategy for Sustainable Development The European Union’s (EU) strategy for sustainable development, agreed at the 2001 Gothenburg Summit, amended in 2005 and reviewed in 2009, places a strong emphasis on seven key sustainability themes:</p> <ul style="list-style-type: none"> - Climate change and clean energy - Sustainable transport - Sustainable consumption and production - Conservation and management of natural resources - Public health - Social inclusion, demography and migration - Global poverty and sustainable development challenges 	<p>No target or indicators.</p>	<p>The SA framework should ensure the objectives of this overarching document are covered</p>
<p>European Strategy for Sustainable Development (2009) This strategy provides an EU-wide policy framework to deliver sustainable development, i.e. to meet the needs of the present without compromising the ability of future generations to meet their own needs.</p>	<p>Limit climate change and its effects by meeting commitments under Kyoto Protocol and under the framework of the European Strategy on Climate Change. Energy efficiency, renewable energy and transport will be the subject of particular efforts. Limiting the adverse effects of transport and reducing regional disparities and do more to develop transport that is environmentally friendly and conducive to health. To promote more sustainable modes of production and consumption with attention paid to how much ecosystems can tolerate. Sustainable management of natural resources in particular the EU must make efforts in agriculture, fisheries and forest management; see to it that the Natura 2000 network is completed; define and implement priority actions to protect biodiversity, and make sure that aspects associated with the seas and oceans are duly taken into account. Recycling and re-use must also be supported. Limiting major threats to public health. Social exclusion and poverty and mitigate the effects of an ageing society.</p>	<p>These issues need to be incorporated into the SA appraisal process.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>European Structural and Investment Funds Growth Programme 2014-2020 The European Structural and Investment Funds programme provides funds to help local areas grow. The funds support investment in innovation, businesses, skills and employment and create jobs.</p>	<p>The fight against global poverty. Running from 2014 to 2020, there are three types of funds involved in the programme. European Structural and Investment Funds (ESIF) focuses on improving the employment opportunities, promoting social inclusion and investing in skills by providing help to people who need support in fulfilling their potential. European Regional Development Fund (ERDF) supports research and innovation, small to medium sized enterprises and creation of a low carbon economy. European Agricultural Fund for Rural Development (EAFRD) supports rural businesses to grow and expand, improve knowledge and skills and get started.</p>	<p>A need to recognise of the direction of the strategy in terms of facilitating sustainable economic growth.</p>
<p>EU Seventh Environmental Action Programme of the European Community (2014) Identifies three key objectives:</p> <ul style="list-style-type: none"> - to protect, conserve and enhance the Union’s natural capital - to turn the Union into a resource-efficient, green, and competitive low-carbon economy - to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing. 	<p>Four so called "enablers" will help Europe deliver on these goals:</p> <ul style="list-style-type: none"> - better implementation of legislation - better information by improving the knowledge base - more and wiser investment for environment and climate policy - full integration of environmental requirements and considerations into other policies - Two additional horizontal priority objectives complete the program: - to make the Union's cities more sustainable - to help the Union address international environmental and climate challenges more effectively. 	<p>Ensure that the Local Plan Review SA takes into account the objectives.</p>
<p>Our Life Insurance, Our Natural Capital: An EU Biodiversity Strategy to 2020 (2011) This strategy is aimed at reversing biodiversity loss and speeding up the EU's transition towards a resource efficient and green economy.</p>	<p>The EU 2020 biodiversity target is underpinned by the recognition that, in addition to its intrinsic value, biodiversity and the services it provides have significant economic value that is seldom captured in markets. Because it escapes pricing and is not reflected in society's accounts, biodiversity often falls victim to competing claims on nature and its use. The 2020 headline target is: Halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as feasible, while stepping up the EU contribution to averting global biodiversity loss.</p>	<p>Ensuring that biodiversity forms part of the SA assessment and that biodiversity mitigation measures to reduce the impact of development on the environment are addressed.</p>
<p>NATIONAL POLICIES</p>		

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>National Planning Policy Framework (2019) The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied. It replaces all previous planning policies set out in PPSs and PPGs. It sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. Presumption in favour of sustainable development. Delivering sustainable development by:</p> <ul style="list-style-type: none"> - Plan Making - Decision Making - Delivering a sufficient supply of homes - Building a strong, competitive economy - Ensuring the vitality of town centres - Promoting healthy and safe communities - Promoting sustainable transport - Supporting high quality communications - Making effective use of land - Achieving well-designed places - Protecting Green Belt land - Meeting the challenge of climate change, flooding and coastal change - Conserving and enhancing the natural environment - Conserving and enhancing the historic environment - Facilitating the sustainable use of minerals 	<p>Relevant targets and indicators for different topic areas. The NPPF reiterates the need to be compliant with the SA regulations during the production of a Local Plan. The NPPF is also supportive by an extensive range of national planning policy guidance (NPPG) – noted below.</p>	<p>Local Plan making and all relevant Sustainability Appraisal process should comply with the NPPF. Sustainability Appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors. Wide ranging implications for site allocations.</p>
<p>National Planning Practice Guidance (2014 onwards) Provides further guidance to be read alongside the NPPF on a range of topics that link to the promotion of sustainable development including:</p> <ul style="list-style-type: none"> - Air quality - Climate change - Conserving and enhancing the historic environment - Flood risk - Health and well being - Housing and economic development - Natural environment - Minerals - Rural housing - Open space - Transport 	<p>No target or indicators.</p>	<p>Local Plan making and all relevant Sustainability Appraisal process should comply with the NPPG. Sustainability Appraisal should be an integral part of the plan preparation process and should consider all the likely significant effects on the environment, economic and social factors. Wide ranging implications for site allocations.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<ul style="list-style-type: none"> - Viability - Waste - Water supply, wastewater and water quality 		
<p>Securing the Future: The UK Government Sustainable Development Strategy (Secretary of State for Environment, Food and Rural Affairs, March 2005)</p> <p>The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.</p> <p>The Strategy includes the following guiding principles:</p> <ul style="list-style-type: none"> - Living Within Environmental Limits – respecting the limits of the planet’s environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations; - Ensure a Strong, Healthy and Just Society - Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all; - Achieving a Sustainable Economy - Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised; - Promoting Good Governance - Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy, and diversity; and - Using Sound Science Responsibly - Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (the precautionary principle) as well as public attitudes and values. <p>The Strategy lists four priority areas for immediate action:</p> <ul style="list-style-type: none"> - Sustainable production and consumption; - Climate change and energy; - Natural resource protection and environmental enhancement; and - Sustainable communities. 	<p>For the UK Government Strategy, a set of 68 indicators have been established, consisting of the 20 UK Framework Indicators and a further 48 indicators with which to monitor progress.</p>	<p>Local Plan should take account of the guiding principles and the priority areas for action and address these in the policy framework.</p> <p>The SA should take into account the guiding principles and priority areas for action in the Strategy and seek to reflect these in the SA Objectives / decision making criteria.</p>
<p>Urban White Paper: Our Towns, Our Cities, The Future. Delivering an Urban Renaissance Department for the Environment, Transport and the Regions (DETR), November 2000.</p> <p>The vision of the White Paper is ‘of towns, cities and suburbs that offer a high quality of life and opportunity for all, not just the few’. The aim is to see:</p>	<p>The national target is that by 2008, 60% of additional housing should be provided on previously developed land and through conversions of existing buildings. The White Paper also includes a national target for 17% of underused land to be reclaimed by 2010.</p>	<p>Local Plan should take account of the key aims of the Urban White Paper and seek to address the aims in the policy framework.</p> <p>The use of previously developed land</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<ul style="list-style-type: none"> - People shaping the future of their community, supported by strong and truly representative local leaders; - People living in attractive, well kept towns and cities which use space and buildings well; - Good design and planning which makes it practical to live in a more environmentally sustainable way, with less noise, pollution and traffic congestion; - Towns and cities able to create and share prosperity, investing to help all their citizens reach their full potential; and - Good quality services – health, education, housing, transport, finance, shopping, leisure and protection from crime – that meet the needs of people and businesses wherever they are. <p>This urban renaissance will benefit everyone, making towns and cities vibrant and successful, and protecting the countryside from development pressure.</p>		<p>and reuse of buildings should be promoted. However, LPAs where setting targets for the delivery of housing on PDL, must take into account the scale and nature of available land supply, constraints on delivery and viability.</p> <p>The SA should take into consideration the proposals in the Urban White Paper and seek to reflect the aims of the White Paper in the SA Objectives / decision making criteria.</p>
<p>UK Biodiversity Action Plan (DoE, 1994) and UK Post 2010 Biodiversity Framework</p> <p>The UK BAP is the UK Government's response to the Convention on Biological Diversity signed in 1992. The BAP describes the UK's biological resources and includes a detailed plan for the protection of these resources, including a series of action plans for Priority Species and Habitats.</p> <p>UK Biodiversity Steering Group 1995 set a goal to 'conserve and enhance biological diversity within the UK and to contribute to the conservation of biodiversity through all appropriate mechanisms'. It should be noted that in 2008 there was a UK-wide Reporting Round for national and local BAPs, during which the Priority Species and Habitats were reviewed and the lists updated.</p> <p>The 'UK Post-2010 Biodiversity Framework', published in July 2012, succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach', and is the result of a change in strategic thinking following the publication of the CBD's 'Strategic Plan for Biodiversity 2011–2020' and its 20 'Aichi Biodiversity Targets', at Nagoya, Japan in October 2010, and the launch of the EU Biodiversity Strategy (EUBS) in May 2011. The Framework demonstrates how the work of the four countries and the UK contributes to achieving the Aichi Biodiversity Targets, and</p>	<p>The UK Bap contained a list of 59 broad targets for the Government and its nature conservation agencies, in partnership with others, to conserve, and where practicable, to enhance wild species and wildlife habitats over the next 20 years.¹⁹.</p>	<p>Local Plan policy framework should ensure the protection, conservation and enhancement of biodiversity in line with the UK BAP.</p> <p>The SA should take into consideration the goal of the UK BAP and SA Objectives / decision making criteria relating to the conservation and enhancement of species, habitats and wildlife networks should be included within the SA framework.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>identifies the activities required to complement the country biodiversity strategies in achieving the targets¹⁸.</p>		
<p>National Housing Standards 2015 The Government created an approach for the setting of technical standards for new housing as set out in ‘The Ministerial statement’ (25th March 2015). Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of an optional nationally described space standard and in relation to accessibility only. Nationally Described Space Standard (NDSS). A single standard for minimum space requirements is set out by national guidance. Accessible Housing. In relation to accessible housing, national guidance states that if a LPA chooses to adopt standards in relation to accessible housing, then they can relate only to 2 categories, and a target percentage would need to be set for each category.</p>	<p>The NDSS sets out minimum size standards for different dwellings in terms of numbers of bedrooms and numbers of storeys The Accessible Housing categories are: M4(2) Category 2: Accessible and adaptable dwellings is an optional Building Regulation, and as such would only apply where planning policy allows and when conditioned on a planning application. M4(3) Category 3: Wheelchair user dwellings is an optional Building Regulation.</p>	<p>Include SA Objectives which promote sustainable development and seek to achieve higher levels of efficiency (e.g. in energy, water etc.) where appropriate.</p>
<p>The Natural Choice: Securing the Value of Nature (White Paper 2011) Outlines the Government’s vision for the natural environment over the next 50 years, backed up with practical action to deliver the ambition Four themes: <u>Protecting and improving our natural environment</u></p> <ul style="list-style-type: none"> - Supporting Local Nature Partnerships, working at a strategic level to improve benefits and services from a healthy natural environment. - Support establishing new Nature Improvement Areas based on local assessment of opportunities for restoring and connecting nature on a significant scale, including identifying within local plans. - The planning system to deliver the homes, business, infrastructure and thriving local places while protecting and enhancing the natural and historic environment, through planning reform (NPPF). - Introducing biodiversity off-setting, managed locally. - Planning for low-carbon infrastructure - Restoring the elements of our natural network (Protecting and improving woodlands and forests, restoring nature in rivers and 	<p>No specific targets or indicators. The monitoring section of this white paper indicates that a range of indicators will be established for biodiversity and other environmental issues.</p>	<p>The importance of nature not just for species but for people too needs to be considered in the SA including - awareness of possible new natural environment Designations, initiatives affecting potential site allocations and closer links between Greenspace accessibility and public health. Ensure that site allocations and policies will protect the intrinsic value of nature and recognise the multiple benefits it could have for communities. Include a sustainability objective relating to the enhancement of the natural environment.</p>

¹⁹ Ibid

¹⁸ <http://jncc.defra.gov.uk/ukbap> [Accessed: 27.01.21]

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>water bodies, restoring nature in towns, cities and villages, including valuing green</p> <ul style="list-style-type: none"> - infrastructure for communities and managing environmental risks (flooding and heat waves) <p><u>Growing a green economy</u></p> <ul style="list-style-type: none"> - Range of initiatives to encourage environmental benefits for business <p><u>Reconnecting people and nature</u></p> <ul style="list-style-type: none"> - Local Nature Partnerships and Health and Wellbeing Boards work together in promoting the health benefits of the natural environment - Promoting the natural environment in schools - Improve access to nature in local neighbourhoods, including measures in the Localism Act (including neighbourhood plans) - Improving access to the countryside <p><u>International and EU leadership</u></p> <ul style="list-style-type: none"> - Number of key reforms including implementation of the Nagoya commitments on biodiversity 		
<p>Natural Environment and Rural Communities (NERC) Act 2006 An Act to make provision about bodies concerned with the natural environment and rural communities; to make provision in connection with wildlife, sites of special scientific interest, National Parks and the Broads; to amend the law relating to rights of way; to make provision as to the Inland Waterways Amenity Advisory Council; to provide for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.</p>	<p>Section 40 of the NERC Act places a duty to conserve biodiversity on public authorities in England. It requires local authorities and government departments to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision-making. Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats which are regarded by Natural England to be of "principal importance" for the purposes of conserving biodiversity in England.</p>	<p>The plan should seek to conform with the requirements of the NERC Act.</p>
<p>National biodiversity climate change vulnerability model The National Biodiversity Climate Change Vulnerability Model (NBCCVM) aims to provide a spatially explicit assessment of the relative vulnerability of priority habitats based on established climate change adaptation principles. Climate change will exacerbate existing pressures on biodiversity and bring new challenges of its own. Adaptation to climate change is therefore a priority for conservation and environmental management.</p>	<p>This tool could be interrogated to identify where measures for enhancing adaptability to climate change are most needed in order to protect protected habitats.</p>	<p>The plan could seek to ensure that new policies and development to not inhibit the potential for future measures that protect habitats from the impacts of climate change.</p>
<p>Rights of Way Circular (1/09) Guidance for Local Authorities V. 2 October 2009 This circular gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.</p>	<p>Various recommendations in relation to managing, maintaining and changing the network including how to liaise with the public.</p>	<p>The plan should seek to adopt measures set out in the guidance for options that could impact on public rights of way (PRoW).</p>
<p>The Flood and Water Management Act 2010 The Flood and Water Management Act (FWMA) takes forward a number of</p>	<p>Lead local flood authorities are responsible for local sources of flood risk, in particular from surface runoff,</p>	<p>Policies should seek to manage and improve flood risk across the District and</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>recommendations from the Pitt Review into the 2007 floods. It places new responsibilities on the Environment Agency, local authorities and property developers (among others) to manage the risk of flooding.</p>	<p>groundwater and ordinary watercourses. Local authorities are responsible for ensuring that new requirements for preliminary flood risk assessments and for approval of sustainable drainage systems are met.</p>	<p>prevent development from being exposed to high levels of flood risk. Include SA Objective which seeks to prevent inappropriate new development in high flood risk areas and ensure that new development does not cause flooding.</p>
<p>Water for Life (White Paper 2011) Water for Life describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is. It explains that we all have a part to play in the realisation of this vision.</p>	<p>No specific targets or indicators relating to Local Plan policies. The White Paper includes Ofwat targets for addressing leakage and demand.</p>	<p>Ensure that site allocations and policies will support the wise use of water, and improvement of water quality. Include sustainability objectives that relate to water quality and quantity.</p>
<p>Biodiversity 2020: A Strategy for England’s Wildlife and ecosystem services <u>Mission:</u> “to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people”. Sets out high level outcomes to 2020. <u>Vision:</u> “By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone”. <u>Priority Action:</u></p> <ul style="list-style-type: none"> - Establish more coherent and resilient ecological networks on land that safeguard ecosystem services for the benefit of wildlife and people; - Establish and effectively manage an ecologically coherent network of marine protected areas covering in excess of 25% of English waters by end of 2016; - Take targeted action for recovery of priority species, whose conservation is not delivered through wider habitat-based and ecosystem measures; - Ensure that ‘agricultural’ genetic diversity is conserved and enhanced wherever appropriate; - Work with the biodiversity partnership to engage significantly more people in biodiversity issues; - Promote taking better account of the values of biodiversity in public and private sector decision making, including providing tools to help consider a wider range of ecosystem services; - Develop new and innovative financing mechanisms to direct more 	<p><u>Outcome 1 –Habitats and ecosystems on land (including freshwater environments)</u> 1A. Better wildlife habitats with 90% of priority habitats in favourable or recovering condition and at least 50% of SSSIs in favourable condition, while maintaining at least 95% in favourable or recovering condition; 1B. More, bigger and less fragmented areas for wildlife, with no net loss to priority habitat and an increase in the overall extent of priority habitats by at least 200,000 ha; 1C. By 2020, at least 17% of land and inland water, especially areas of particular importance for biodiversity and ecosystem services including through management of our existing systems of protected areas and the establishment of nature improvement areas; 1D. Restoring at least 15% of degraded ecosystems as a contribution to climate change mitigation and adaptation. <u>Outcome 2 – Marine habitats, ecosystems and fisheries</u> 2A. By the end of 2016 in excess of 25% of English waters will be contained in a well-managed Marine Protected Area network that helps deliver ecological coherence by conserving representative marine habitats; 2B. By 2020 we will be managing and harvesting fish sustainably; 2C. By 2022 we will have marine plans in place covering the whole of England’s marine area, ensuring the sustainable development of our seas, integrating economic</p>	<p>Awareness of biodiversity value of land in assessment of potential site allocations.</p>

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<p>funding towards achievement of biodiversity outcomes.</p>	<p>growth, social need and ecosystem management. <u>Outcome 3 - Species</u> By 2020, an overall improvement in the status of wildlife and prevented further human-induced extinctions of known threatened species. <u>Outcome 4 – People</u> By 2020, significantly more people engaged in biodiversity issues, aware of its value and taking positive action.</p>	
<p>A Green Future; Our 25 Year Plan to Improve the Environment DEFRA 2018 Broad long-range environmental plan covering a number of key environmental directions.</p>	<p>Sets out a wide range of goals and targets: <u>Clean air</u> We will achieve clean air by: Meeting legally binding targets to reduce emissions of five damaging air pollutants; this should halve the effects of air pollution on health by 2030. Ending the sale of new conventional petrol and diesel cars and vans by 2040. Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework. <u>Clean and plentiful water</u> We will achieve clean and plentiful water by improving at least three quarters of our waters to be close to their natural state as soon as is practicable by: Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies. Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans. Supporting OFWAT’s ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025. Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters; we will make sure that potential bathers are</p>	<p>Ambitions and targets will need to be reviewed as part of the Bradford local Plan.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
	<p>warned of any short-term pollution risks.</p> <p><u>Thriving plants and wildlife</u></p> <p>We will achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife.</p> <p>At sea, we will do this by:</p> <p>Reversing the loss of marine biodiversity and, where practicable, restoring it.</p> <p>Increasing the proportion of protected and well-managed seas, and better managing existing protected sites.</p> <p>Making sure populations of key species are sustainable with appropriate age structures</p> <p>ensuring seafloor habitats are productive and sufficiently extensive to support healthy, sustainable ecosystems.</p> <p>On land and in freshwaters, we will do this by:</p> <p>restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term.</p> <p>Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits.</p> <p>Taking action to recover threatened, iconic or economically important species of animals, plants and fungi, and where possible to prevent human induced extinction or loss of known threatened species in England and the Overseas Territories.</p> <p>Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042.</p> <p><u>Reducing the risks of harm from environmental hazards</u></p> <p>We will reduce the risk of harm to people, the environment and the economy from natural hazards including flooding, drought and coastal erosion by:</p> <p>Making sure everyone is able to access the information they need to assess any risks to their lives and livelihoods, health and prosperity posed by flooding and coastal erosion.</p> <p>Bringing the public, private and third sectors together to work with communities and individuals to reduce the risk of harm.</p>	

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
	<p>Making sure that decisions on land use, including development, reflect the level of current and future flood risk.</p> <p>Ensuring interruptions to water supplies are minimised during prolonged dry weather and drought.</p> <p>Boosting the long-term resilience of our homes, businesses and infrastructure.</p> <p>Using resources from nature more sustainably and efficiently</p> <p>We will ensure that resources from nature, such as food, fish and timber, are used more sustainably and efficiently. We will do this by:</p> <p>Maximising the value and benefits we get from our resources, doubling resource productivity by 2050.</p> <p>Improving our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches increasing timber supplies ensuring that all fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield ensuring that food is produced sustainably and profitably.</p> <p><u>Enhancing beauty, heritage and engagement with the natural environment</u></p> <p>We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone. We will do this by: safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.</p> <p>Making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing.</p> <p>Focusing on increasing action to improve the environment from all sectors of society.</p> <p>Mitigating and adapting to climate change.</p> <p>We will take all possible action to mitigate climate change, while adapting to reduce its impact.</p> <p>We will do this by:</p>	

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
	<p>Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century implementing a sustainable and effective second National Adaptation Programme</p> <p><u>Minimising waste</u></p> <p>We will minimise waste, reuse materials as much as we can and manage materials at the end of their life to minimise the impact on the environment. We will do this by:</p> <p>Working towards our ambition of zero avoidable waste by 2050.</p> <p>Working to a target of eliminating avoidable plastic waste by end of 2042.</p> <p>Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones.</p> <p>Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk.</p> <p>Delivering a substantial reduction in litter and littering behaviour.</p> <p>Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.</p> <p><u>Managing exposure to chemicals</u></p> <p>We will make sure that chemicals are safely used and managed, and that the levels of harmful chemicals entering the environment (including through agriculture) are significantly reduced. We will do this by:</p> <p>Seeking in particular to eliminate the use of Polychlorinated Biphenyls by 2025, in line with our commitments under the Stockholm Convention</p> <p>reducing land-based emissions of mercury to air and water by 50% by 2030.</p> <p>Substantially increasing the amount of Persistent Organic Pollutants material being destroyed or irreversibly transformed by 2030, to make sure there are negligible emissions to the environment.</p>	

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
	<p>fulfilling our commitments under the Stockholm Convention as outlined in the UK's most recent National Implementation Plan</p> <p><u>Enhancing biosecurity</u></p> <p>We will enhance biosecurity to protect our wildlife and livestock and boost the resilience of plants and trees. We will do this by:</p> <p>Managing and reducing the impact of existing plant and animal diseases; lowering the risk of new ones and tackling invasive non-native species.</p> <p>Reaching the detailed goals to be set out in the Tree Health Resilience Plan of 2018</p> <p>Ensuring strong biosecurity protection at our borders, drawing on the opportunities leaving the EU provides.</p> <p>Working with industry to reduce the impact of endemic disease.</p>	
<p>Safeguarding our Soils: A Strategy for England 2011</p> <p>Outlines the Government's approach to safeguarding our soils for the long term. Provides a vision to guide future policy development across a range of areas and sets out the practical steps to be taken to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve our understanding of the threats to soil and best practice in responding to them</p>	<p>No specific targets or indicators.</p> <p>Makes reference to peat extraction targets.</p>	<p>Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.</p> <p>Develop policies that promote brownfield / previously developed land sites for development where the land is not of high environmental value.</p> <p>Protection of important open spaces / land.</p> <p>Include SA Objective which seeks to safeguard and enhance the quality of soil.</p>
<p>Planning & Compulsory Purchase Act 2004 (as amended)</p> <p>The Planning and Compulsory Purchase Act 2004 is a key element of the Government's agenda for speeding up the planning system. The provisions introduce powers which allow for the reform and speeding up of the plans system and an increase in the predictability of planning decisions, the speeding up of the handling of major infrastructure projects and the need for simplified planning zones to be identified in the strategic plan for a region.</p>	<p>Policies will need to take account of this Act.</p>	<p>Policies will need to take account of this Act.</p>
<p>Housing & Planning Act 2016</p> <p>An Act to make provision regarding housing, estate agents, rent air charges, planning and compulsory purchase.</p> <ul style="list-style-type: none"> - place a duty on local planning authorities to actively promote the 	<p>Policies will need to take account of this Act</p>	<p>Policies will need to take account of this Act</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>development of Starter Homes and embed them in the planning system</p> <ul style="list-style-type: none"> - unlock brownfield land to provide homes faster, requiring local authorities to prepare, maintain and publish local registers of specified land - support the doubling of the number of custom-built and self-built homes to 20,000 by 2020 - ensure that every area has a Local Plan - reform the compulsory purchase process to make it clearer, fairer and faster - simplify and speed up neighbourhood planning 		
<p>Localism Act (2011) The Localism Act 2011 introduced the requirement of local authorities to comply with the ‘Duty to Cooperate’ in the preparation of Development Plan Documents (the ‘local plan’). The purpose of this is to satisfy both legal compliance and soundness issues in plan making, to ensure that any ‘cross administrative boundary issues’ are addressed. The Localism Act also included provisions for the preparation of Neighbourhood Plan and once adopted, for these to form part of the statutory Development Plan for a local area.</p>	<p>Policies will need to take account of this Act.</p>	<p>Ensure that the consultation process enables genuine opportunities for local people to be involved in the Local Plan process and to be part of planning decisions made in the areas affected. Ensure that evidence collected to support the SA and the Local Plan Review is locally derived, where applicable Sustainability objectives to be included with regard to social inclusion and communities.</p>
<p>Planning (Listed Buildings & Conservation Areas) Act 1990 In addition to normal planning framework set out in the Town and Country Planning Act 1990:</p> <ul style="list-style-type: none"> - the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest - the Ancient Monuments and Archaeological Areas Act 1979 provides specific protection for scheduled monuments 	<p>Protecting and enhancing the historic environment</p>	<p>Policies relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the development plan.</p>
<p>White Paper - Our Health, Our Care, Our Say: A New Direction for Community Services (Department for Health, January 2006) The Health White Paper sets the direction for the UK health and social care system. The vision is of a new strategic direction for all the care and support services that people use in their communities and neighbourhoods. There are three themes:</p> <ul style="list-style-type: none"> - Putting people more in control of their own health and care; 	<p>No specific targets or indicators relating to Local Plan policies.</p>	<p>Local Plan should consider the key themes of the Health White Paper in the policy framework. The SA should take into consideration the Health White Paper key themes and an SA Objective / decision making criteria relating to improving health and</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<ul style="list-style-type: none"> - Enabling and supporting health, independence and well being; and - Rapid and convenient access to high quality, cost effective care. 		<p>well being and ensuring access to quality healthcare should be included within the SA framework.</p>
<p>Climate Change the UK Programme, Secretary of State for the Environment, Food and Rural Affairs, March 2006</p> <p>The UK Climate Change Programme sets out the policies and priorities for climate change action in the UK and internationally. The aim is to reduce dependence on fossil fuel and make a radical shift to more sustainable patterns of energy generation and consumption.</p>	<p>The UK Government have set a domestic goal to reduce carbon dioxide emissions by 20 per cent below 1990 levels by 2010 and by 60 per cent by 2050.</p>	<p>The Climate Change Programme policies and priorities for climate change action should be reflected in the Local Plan policy framework.</p> <p>The SA should take into consideration the policies and priorities of the Climate Change Programme and SA Objectives / decision making criteria relating to energy supply and use, reducing greenhouse gas emissions, sustainable transport, and climate change adaptation should be included within the SA framework.</p>
<p>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)</p> <p>The Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK in the long term. The Strategy sets out the air quality standards and objectives for concentrations of pollutants in England.</p>	<p>Sets out a number of targets for different pollutants including:</p> <ul style="list-style-type: none"> • Particles • NO2 • Ozone • Sulphur dioxide • Benzene • Carbon monoxide • Lead 	<p>Develop policies that meet standards of air quality.</p> <p>Sustainability objectives that seek to improve air quality.</p>
<p>Planning Policy for Traveller Sites (2015)</p> <p>Government’s aims in respect of traveller sites are:</p> <ul style="list-style-type: none"> - That local planning authorities should make their own assessment of need for the purposes of planning - To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites - To encourage local planning authorities to plan for sites over a reasonable timescale - That plan-making and decision-taking should protect Green Belt from inappropriate development - To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites - That plan-making and decision-taking should aim to reduce the 	<p>Policies will need to account of this policy.</p>	<p>Develop policies that address the requirements and ensure needs assessment is up to date.</p> <p>Sustainability objectives that relate to social inclusion and housing needs.</p> <p>Ensure that the relevant considerations are taken into account when allocating sites.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>number of unauthorised developments and encampments and make enforcement more effective for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies</p> <ul style="list-style-type: none"> - To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply - To reduce tensions between settled and traveller communities in plan-making and planning decisions - To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. - For local planning authorities to have due regard to the protection of local amenity and local environment 		
<p>The National Adaptation Programme and Third Strategy for Climate Change Adaptation Report – Making the Country Resilient to a Changing Climate, July 2018</p> <p>The report sets out visions for the following sectors:</p> <ul style="list-style-type: none"> - Natural Environment – “The natural environment with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change, and valued for the adaptation services it provides - Profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping to maintain ecosystem services and protect and enhance biodiversity.” - Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate” - People & The Built Environment – “To promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change, and able to capitalise on the potential health gains associated with tackling it”. “A health service, a public health and social care system which are resilient and adapting to a changing climate.” “Buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.” “Emergency services and local resilience capability take account of and are resilient to, a changing climate” - Business & Industry – “UK businesses are resilient to extreme 	<p>No targets or indicators</p>	<p>Develop policies that account for resiliency aims, would be a cross cutting theme over multiple subjects. Sustainability objectives that seek a better adaptation to climate change, including mitigations of climate change. Include SA Objectives which seek to promote the implementation of adaptation measures to make the area more resilient to a changing climate.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>weather and prepared for future risks and opportunities from climate change”.</p> <ul style="list-style-type: none"> - Local Government – “Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate” 		
<p>Historic England Corporate Plan 2018-2021</p>	<p>No targets or indicators</p>	<p>Develop policy that protects important heritage assets. Sustainability objectives that consider the contribution of historical assets to the built environment, as well as, benefits to community/social inclusion.</p>
<p>REGIONAL POLICIES</p>		
<p>Site Improvement Plan: South Pennine Moors The plan provides a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outlines the priority measures required to improve the condition of the features. It does not cover issues where remedial actions are already in place or ongoing management activities which are required for maintenance.</p>	<p>The Moors are vulnerable to 15 defined threats and pressures that can be caused by identified impact pathways. Measures for avoiding, mitigating and reversing these effects are identified and costed.</p>	<p>The plan should seek to avoid having a significant effect on the South Pennine Moors via the identified impact pathways.</p>
<p>Nidderdale AONB Management Plan 2014 - 2019 Sets out how the special qualities of this nationally important landscape can be maintained in a way that does not harm the interests of people who live and work in the AONB. The Plan coordinates action by land managers, members of the AONB’s rural communities, third sector bodies like the National Trust, local authorities and Government agencies. It contains policies that say what the AONB stands for and a vision of how the AONB should look in 2050, and objectives that are designed to help towards achieving the vision.</p>	<p>Vision, Management Plan Policies for the AONB in order to protect and enhance the landscape. L1 – Promote awareness and understanding of the special qualities of the AONB L2 – Maintain and enhance the special qualities of the AONB’s landscape including priority wildlife habitats and restore damaged or degraded features L3 – Take action to ensure characteristic features of the AONB’s landscape are resilient to climate change by working independently and in partnership with other protected areas across the northern uplands where possible L4 – Resist applications for planning permission for major development, and applications for smaller scale development that conflict with the purposes of designation in and adjacent to the AONB boundary L5 – Promote the highest standards of design, choice of materials and</p>	<p>The plan should seek to accord with the AONB Management Plan in order to help protect and enhance its character.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
	<p>environmental performance standards in new development, and in the conversion and restoration of old buildings</p> <p>L6 – Encourage sustainable development to create affordable housing, new enterprise based on environmental qualities including farm diversification and green tourism ventures, small-scale renewable energy schemes and other small-scale development that makes a positive contribution to maintaining landscape character and to the repair of damaged or degraded landscape features</p> <p>NE1 – Work in partnership with land managers and conservation organisations to ensure designated sites, including those designated for their geological interest, are managed to the highest standards in accordance with international, national and local guidelines</p> <p>NE2 – Support landowners to improve management of Habitats of Principle Importance so that 90% are in favourable or recovering condition by 2019 and ensure funding is available to create new areas of priority habitat by 2017</p> <p>NE3 – Work with landowners and partners to secure compliance with Water Framework Directive criteria for ‘Good Ecological Status’ for all rivers and still waters by 2019</p> <p>HE1 – Protect the historic landscape and features of archaeological importance by resisting inappropriate development and supporting owners and managers to improve condition where possible</p> <p>HE2 – Support innovative proposals for sustainable future use of historic buildings and structures where this does not cause unacceptable harm to the</p>	

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	<p>asset or the wider landscape</p> <p>HE3 – Encourage initiatives designed to increase awareness and understanding of archaeology and the historic environment</p> <p>UE1 – Support North Yorkshire County Council’s efforts to improve the quality and accessibility of the rights of way network</p> <p>UE2 – Reduce the impact of vehicular use of Unsurfaced Unclassified Roads where this is having an adverse impact on conservation of the natural and cultural heritage of the AONB and its enjoyment by the public</p> <p>UE3 – Increase understanding and awareness of the AONB through communications, events and volunteering to deliver AONB statutory purposes</p> <p>LW1 – Work closely with established and new businesses to ensure that changing practices, and plans for growth and expansion, increase business viability and have a positive effect on the AONB</p> <p>LW2 – Support growth of tourism businesses that do not cause landscape harm, cause damage to or have an adverse impact on protected wildlife sites, that comply with the principles of sustainable tourism, and that actively contribute to improving environmental quality</p>	
<p>Leeds City Region Development Programme Leeds City Council, November 2006 The Leeds City Region Development Programme is an economic plan for the city region, built on the three principles of subsidiary, added value, and co-operation between the eleven local authorities. The shared vision for the Leeds City Region is: “to develop an internationally recognised city-region; to raise economic performance; to spread prosperity across the whole of the city region, and to promote a better quality of life for all of those who live and work here.” The Development Programme is the action plan that sets out how the</p>	<p>No targets or indicators</p>	<p>Local Plan policy framework should be developed with due regard to the vision and aims of the Development Programme. The SA should take into consideration the vision and aims of the Development Programme and SA Objectives / decision making criteria relating to economic performance and quality of life included within the SA framework.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>partner authorities will deliver their shared Vision.</p> <p>Transport Strategy 2040 (WYCA, 2017) This strategy aims to put in place the right transport conditions - building on the City Region’s strengths and tackling underlying issues - meeting increasing demand for travel in a sustainable way while also realising the ambitions for inclusive growth contained in SEP and District local plans. It also aims to influence and make the most of investment decisions being made at the pan-northern and national levels, to maximise opportunities for our region. The Transport Strategy 2040 ambitions and policies are framed within six core themes:</p> <ul style="list-style-type: none"> - Inclusive Growth, Environment, Health and Wellbeing - Road network - Places to live and work - One System Public Transport - Smart futures - Asset management and resilience 	<p>The strategy sets out a number of transport targets: 25% more trips made by bus by 2027 75% more trips made by rail by 2027 300% more trips made by bicycle by 2027</p>	<p>Local Plan policy framework should be developed with due regard to the vision and policies of the Strategy. The SA should take into consideration the vision and policies of the Strategy and SA Objectives / decision making criteria relating to economic performance, road safety and quality of life included within the SA framework</p>
<p>West Yorkshire Local Transport Plan (2011 – 2026) The third West Yorkshire LTP sets out a programme for a wide range of improvements to local transport over the period 2011 to 2026. <u>Objectives of LTP3</u> Public feedback helped shape the Plan, which is entitled ‘My Journey’, and has three main objectives:</p> <ul style="list-style-type: none"> - Economy To improve connectivity to support economic activity and growth in West Yorkshire and the Leeds City Region; - Low Carbon To make substantial progress towards a low carbon, sustainable transport system for West Yorkshire, while recognising transport's contribution to national carbon reduction plans; - Quality of Life To enhance the quality of life of people living in, working in and visiting West Yorkshire. <p>The Plan sets out to tackle congestion and a lack of transport investment which are key contributory factors to lower than average economic performance in West Yorkshire. It also aims to prepare for the predicted, post-recession growth in employment, population and housing and their impact on the reliability of the transport network. Four themes run through LTP3 to help ensure it achieves its aims:</p> <ul style="list-style-type: none"> - Transport Assets focusing on the existing components of the transport network such as roads, bus stations & stops and traffic lights to ensure we are getting the most value out of them - Travel Choices enabling customers to make the most sustainable choices about when and how they travel 	<p>The plan includes the following indicators to monitor progress of the plan:</p> <ul style="list-style-type: none"> - Journey Time Reliability; - Access to employment; - Mode share; - Emissions of CO2 from transport; - All road casualties – people killed or seriously injured - Satisfaction with transport 	<p>Local Plan should take account of the LTP objectives and programme and seek to reflect these in the policy framework. The framework should promote the development of an integrated and safe sustainable transport system, seek to limit transport impacts, and ensure accessibility for all. The SA should take into consideration the LTP objectives and programme and SA Objectives / decision making criteria relating to sustainable transport, road safety and access should be included within the SA framework</p>

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<ul style="list-style-type: none"> - Connectivity ensuring people can make integrated and safe journeys using transport networks on which they can rely. - Enhancements improving the overall network to make it more fit for journeys in the future. 		
<p>The Northern Powerhouse: One Agenda, One Economy, One North Transport for the North report prepared by Government, the Northern City Regions and Local Enterprise Partnerships. The aim is to transform Northern growth, rebalance the country’s economy and establish the North as a global powerhouse. The strategy sets out how transport is a fundamental part of achieving these goals and how the long-term investment programmes will be developed.</p> <ul style="list-style-type: none"> - Transform city to city rail connectivity east/west and north/south through both HS2 and a new Trans-North system, radically reducing travel times across this intercity network; - Ensure there is the capacity that a resurgent North will need in rail commuter services; - Deliver the full HS2 ‘Y’ network as soon as possible, including consideration of accelerating construction of Leeds-Sheffield; - Enhance the performance of the North’s Strategic Road Network (SRN) through delivery of the committed first phase of the Roads Investment Strategy; - Further enhance the long-term performance of the Northern SRN through a clear vision and strategy that embraces transformational investment and technology; - Set out a clearly prioritised multimodal freight strategy for the North to support trade and freight movement within the North and to national/international markets; - Pursue better connections to Manchester Airport through TransNorth, whilst city regions consider connectivity to the North’s other major airports; and - Develop integrated and smart ticket structures to support our vision of a single economy across the North. 	<p>No target or indicators.</p>	<p>Local Plan should take account of the vision and objectives and seek to reflect these in the policy framework. The SA should take into consideration the vision and objectives and SAObjectives / decision making criteria relating to sustainable transport, road safety and access should be included within the SA framework.</p>
<p>Leeds City Region Green Infrastructure Strategy (Leeds City Region Partnership, 2010) This strategy sets out the vision for green infrastructure in the city region and to determine how future investment in green infrastructure will be secured and where investment should be targeted. The vision is that “Green infrastructure will shape the future economic, social and environmental success of the Leeds City Region by harnessing the potential of existing environmental resources to promote sustainable</p>	<p>No targets or indicators.</p>	<p>Ensure that site allocations and policies reflect the vision and objectives of the strategy. Include sustainability objectives relating to health and wellbeing, enhancement of open space, provision of sustainable transport, biodiversity and climate change.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>economic growth and to tackle climate change”.</p> <p>Four strategic objectives have been selected to directly address the key drivers of green infrastructure including:</p> <ul style="list-style-type: none"> - promote sustainable growth and economic development; - adapt to and mitigate climate change; - encourage health and wellbeing; and - improve biodiversity 		
<p>LOCAL POLICIES</p>		
<p>Bradford District Plan 2016-2020</p> <p>The Bradford District Plan provides a framework to promote and improve the social, economic and environmental well-being of present and future generations. It sets out the direction of travel for the District, the Council, other public agencies, businesses, voluntary organisations and the public. Through this Plan the Bradford District Partnership is determined to achieve:</p> <ul style="list-style-type: none"> - Better skills, more good jobs and a growing economy - A great start and good schools for all our children - Better health, better lives - Safe, clean and active communities - Decent homes that people can afford to live in 	<p>No target or indicators.</p>	<p>Local Plan policy framework should be developed with due regard to the Bradford District Plan 2016 2020. The SA should take into consideration the key points of the District Plan and SA Objectives /decision making criteria relating to the economy, skills and training, environment and heritage should be included within the SA framework.</p>
<p>Economic Strategy for Bradford District 2018 – 2030 Bradford District Economic Partnership, 2017</p> <p>This strategy sets out plans to grow Bradford’s economy by increasing the number of productive businesses and supporting young and enterprising people to innovate, invest and build fulfilling lives in the District. The strategy is focused on unlocking the growth potential of four key opportunities:</p> <p>YOUNG & ENTERPRISING POPULATION Ensuring all people are equipped with the skills and confidence to succeed.</p> <p>DISTINCTIVE OFFER Using unique architecture, heritage and cultural assets to create compelling investment propositions and an environment for growth.</p> <p>GROWTH POTENTIAL Building on business and sector strengths to drive innovation, increase productivity and create wealth.</p> <p>GLOBALLY CONNECTED DISTRICT Improving transport infrastructure and digital connectivity to strengthen global trading links and access new markets.</p>	<p>In productivity, jobs, earnings and skills the target is to become better than the UK average.</p> <p>PRODUCTIVITY Raising productivity is key economic challenge. The District want to raise Gross Value Added (GVA) per head of population from a current figure of £18,600 to £26,600 to the match the UK average. Achieving this would increase the value of our economy from £10bn to £14bn</p> <p>EMPLOYMENT More people getting good jobs will increase productivity and ensure the benefits of growth are spread more widely. Bradford’s employment rate has consistently lagged behind the UK rate over the past decade. The average gap over this period equates to 20,000 people</p> <p>SKILLS Higher level skills attainment is the single most important determinant of labour market success and a key driver of productivity growth. NVQ3 equates to two or more A levels. The partnership wants to support 48,000 residents to raise their skills level to NVQ3 and above.</p> <p>EARNINGS Raising the earnings of people that live in the District will reflect the move to a more productive and prosperous local economy and make a real difference to</p>	<p>Local Plan should take account of the vision, priorities and actions detailed in the Economic Strategy and seek to reflect these in the policy framework. The SA should take into consideration the vision, priorities and actions detailed in the Economic Strategy and SA Objectives /decision making criteria relating to each of the key priorities should be included within the SA framework.</p>

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Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
	<p>people’s lives</p> <p>SUSTAINABILITY Bradford District has comparatively low levels of CO2 emissions per capita. The challenge will be to maintain emissions below national and northern levels as we grow our economy.</p>	
<p>Bradford District Woodland Strategy (February 2002)</p> <p>The Woodland Strategy expresses the Councils commitment to improving the amount of woodland cover and the quality of woodlands in Bradford. Several policies are identified:</p> <ul style="list-style-type: none"> - Protect existing woodland and tree cover through development control powers, tree preservation orders and planning briefs. - Promote woodland management plans which enhance the value of woodlands. - Continue efforts to increase the woodland cover of the District. - Encourage the recreational and educational use of appropriate woodlands. - Uphold the Hedgerow Regulations and protect important hedgerows from removal. - Establish a register of important hedgerows within the District. - Protect other hedges and stone walls from inappropriate development or by use of planning conditions, where appropriate, and encourage good management practises for existing hedge and wall boundaries. 	<p>The Strategy includes the following indicator: Hectares of trees planted on council-owned / private land.</p>	<p>Local Plan should take account of the policies within the Woodland Strategy and seek to reflect these in the policy framework as appropriate.</p> <p>The SA should take into consideration the objectives and policies of the Woodland Strategy and SA Objectives / decision making criteria relating to protecting and enhancing woodland habitat should be included within the SA framework.</p>
<p>Nature Conservation Strategy for Bradford – Nature and People</p> <p>The Nature Conservation Strategy includes the following aims:</p> <ul style="list-style-type: none"> - Clearly map those sites which are considered important for nature conservation, linking these sites to the UDP. - Protect those sites and species and safeguard their future. - Encourage the management of land for the benefit of wildlife where possible. - Improve access to natural areas where appropriate and increase awareness and education about the environment and the habitats and species within it. <p>The Nature Conservation Strategy objectives are to:</p> <ul style="list-style-type: none"> - Protect the natural resource and assets of the District. - Identify and describe the natural environment resource. - Manage and improve the quality of the environment. - Develop access to areas of nature conservation value. - Educate and increase public awareness. - Promote community involvement and development environmental 	<p>No target or indicators.</p>	<p>Local Plan should take into account the aims, objectives and policies of the Nature Conservation Strategy and seek to incorporate these in the policy framework.</p> <p>A policy on biodiversity should be included, which ensures the protection and enhancement of the natural environment resource.</p> <p>The SA should take into consideration the aims, objectives and policies of the Nature Conservation Strategy and SA Objectives /decision making criteria relating to protecting and enhancing the natural environment, improving access to natural areas where appropriate and increasing education and awareness</p>

Appendix A – Summary of the PPP Review

Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
partnerships.		about the natural environment should be included within the SA framework.
<p>A Stronger Communities Strategy for Bradford District 2018 – 2023 (Draft) The strategy focuses around four thematic priorities:</p> <ul style="list-style-type: none"> - Equality of opportunity - addressing factors affecting economic participation and poverty including language skills and educational attainment. - Promoting greater interaction, dialogue and understanding between people from different backgrounds given the diversity of the population and the extent of residential and educational segregation; ensuring that people understand fully their rights and freedoms and their responsibilities. - Generating and connecting people to opportunities to participate in community and civic life and strengthening leadership. - Tackling crime and the fear of crime so that everyone feels safe. 	No target or indicators.	Local Plan should take account of the work areas of the Plan and seek to ensure that these are addressed in the policy framework where appropriate. The SA should take into consideration the work areas of the Plan and SA Objectives /decision making criteria relating to ensuring access for everyone, encouraging participation and involvement, increasing community cohesion and improving safety should be included within the SA framework.
<p>Bradford Children, Young People and Families Plan 2017 – 2020 This Plan set out the priorities for children, young people and families, how we plan to achieve these, who is responsible, and what success will look like. It has the following key priorities:</p> <ul style="list-style-type: none"> - Ensuring that our children start school ready to learn - Accelerating education attainment and achievement - Ensuring our children and young people are ready for life and work - Safeguarding the most vulnerable and providing early support to families - Reducing health and social inequalities, including tackling child poverty, reducing obesity and improving oral health - Listening to the voice of children, young people and families and working with them to shape services and promote active citizenship 	No target or indicators.	Local Plan should take account of the key issues and objectives in the Young People and Families Plan and the policy framework should contribute positively towards achieving these. The SA should take into consideration the key issues and objectives in the Young People and Families Plan and SA Objectives / decision making criteria relating to improving health and well-being and improving education and training opportunities and participation should be included within the SA framework.
<p>Bradford Local Investment Plan 2011-2020 The Local Investment Plan sets out the housing investment requirements for the next three years, which are necessary for supporting the delivery of Bradford’s Housing and Economic Strategies and underpinning wider economic success across the District.</p>	No target or indicators.	Local Plan should take account of the aims of the Investment Plan and the policy framework should contribute positively towards achieving these
<p>Housing and Homelessness Strategy for Bradford District 2014 – 2019 This strategy represents the commitment of the Council and its partners to meet the housing requirements of the District. These requirements have been identified through consultation and research, including the production of other relevant socio-economic plan and programmes. The four main objectives of this strategy are:</p>	The strategy sets out a series of success measures including: <ul style="list-style-type: none"> - An increase in net additional homes provided - A reducing number of long-term empty homes - An increase in the number of private sector homes where housing conditions have been improved 	Local Plan should take account of the vision and objectives of the Housing Strategy and the policy framework should seek to address these. A policy on housing provision and supply should be included, which sets out housing

Appendix A – Summary of the PPP Review

Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p><u>More homes</u></p> <ul style="list-style-type: none"> - Build sufficient new homes to meet the needs of a growing population. - New homes of the right type in the right location. - Make better use of existing housing to meet growth needs by bringing empty homes back into use. - Make sure there is the appropriate infrastructure to support housing growth. <p><u>Safe and healthy homes</u></p> <ul style="list-style-type: none"> - Ensure all housing is free from the worst hazards. - Make sure homes support people to stay healthy. - Adapt homes so people can stay independent. - Encourage all landlords and lettings agents to provide safe and healthy homes with decent management of tenancies. - Tackle the blight of empty homes. <p><u>Affordable homes</u></p> <ul style="list-style-type: none"> - Ensure an adequate supply of affordable homes to buy or rent that match household incomes. - Enable people to affordably heat and sustain their homes by helping them make their homes more efficient. <p><u>Support independence and prevent homelessness</u></p> <ul style="list-style-type: none"> - Provide support and advice to help people to live independently and prevent homelessness. - Raise aspirations and remove the barriers to employment so households can sustain their housing independence. 	<p>through intervention measures</p> <ul style="list-style-type: none"> - More homes adapted - An increase in the number of new affordable homes delivered - More energy efficient homes in the District, and fewer people living in fuel poverty - An increase in average incomes across the District - An improvement in the number of housing advice cases which successfully and sustainably prevent people becoming homeless - A reducing number of homeless people placed in bed and breakfast accommodation and shorter stays in temporary accommodation - Targeting support at those who need it most and at the right time 	<p>requirements, including housing quality, density and affordability.</p>
<p>Bradford Housing Strategy for the over 50’s 2011-2021</p> <p>The Housing Strategy for the over 50’s seeks to provide for and meet the housing needs of the over 50’s in Bradford. The strategy has the following objectives:</p> <ul style="list-style-type: none"> - Increase choice; - Support everyone; - Work Together; - Make People Aware; - Make It Sustainable; and - Manage the Impact of Change. 	<p>No target or indicators.</p>	<p>Local Plan should take account of the objectives of this strategy. A policy on housing mix should be included which will set out how the Council will deliver the right housing mix to meet the diverse needs of the population of Bradford, including the elderly.</p>
<p>The Bradford District Strategic Housing Market Assessment (SHMA) 2010 and SHMA Update 2013</p> <p>The SHMA is an assessment of Bradford’s Housing Market and consists of four core areas: a review of housing markets; an assessment of housing need and affordable requirements; a review of general market requirements; and</p>	<p>No target or indicators.</p>	<p>A policy on housing provision and supply should be included, which sets out housing requirements, including housing quality, density and affordability. This should be based on an updated and</p>

Appendix A – Summary of the PPP Review

Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>provides policy recommendations.</p> <ul style="list-style-type: none"> - Estimates of current dwellings in terms of size, type, condition, tenure. - Analysis of past and current housing market trends, including balance between supply and demand in different housing sectors and price/affordability. Description of key drivers underpinning the housing market. - Estimate of total future number of households, broken down by age and type where possible. - Estimate of current number of households in housing need. - Estimate of future households that will require affordable housing. - Estimate of future households requiring market housing. - Estimate of the size of affordable housing required. - Estimate of household groups who have particular housing requirements including: families, older people, key workers, black and minority ethnic groups, disabled people, young people, Gypsies and Travellers. 		<p>revised version of the SHMA which utilises the most up to date background data.</p>
<p>Saltaire World Heritage Site Management Plan 2014 The Plan is a partnership document. It sets out a strategic framework for management actions and its purpose is to help co-ordinate the activities of all involved. The Plan works within the Council’s Development Plan (or Local Plan) for the area which sets out planning policies to guide development. The Management Plan is a material consideration in the planning process.</p>	<ul style="list-style-type: none"> - World Heritage Site Boundaries - Saltaire Conservation Area Boundary - Other Values of Saltaire World Heritage - Planning, Policy and Legislative Framework Ongoing Monitoring of Significance and use of the World Heritage Site - Key Management Issues⁸ - Strategic Themes - Objectives and Actions 	<p>The Bradford Local Plan should seek to conform with the requirements and recommendations set out in the Saltaire World Heritage Site Management Plan (2014 revised version).</p>
<p>City of Bradford Metropolitan District Council Rights of Way Improvement Plan April 2007 ROWIPs are intended to be the prime means by which local highway authorities will identify the changes to be made in respect of the management of, and improvement to, their local rights of way network, in order to meet the government’s aim of better provision for walkers, cyclists, equestrians and people with mobility problems.</p>	<p>Policy statements on Promotion</p> <ul style="list-style-type: none"> - Accessibility - Maintenance - Obstructions and Nuisances - Definitive Map Issues - Public Path Orders - Crime Related Issues - Partnership Working - Stakeholder Liaison - Planning Applications 	<p>The plan should seek to conform with the requirements and recommendations set out in the ROWIP.</p>
<p>Bradford Local Biodiversity Action Plan The biodiversity offering in Bradford is summarised at: https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/biodiversity/</p>	<p>The following Habitats and Species have Action Plans to protect and enhance their status in the Bradford District. Habitats Upland Oak Woodland; River Corridors; In Bye Pasture;</p>	<p>The plan should seek to protect and enhance biodiversity in Bradford, particularly that which is afforded protection through the local biodiversity</p>

Appendix A – Summary of the PPP Review

Key objectives relevant to the Bradford Local Plan	Key messages/targets/indicators relevant to the Bradford Local Plan	Implications for to the Bradford Local Plan
<p>A local plan is also set out, which essentially confirms the habitats and species protected in Bradford as well as which habitats are subject to their own action plans.</p>	<p>Hedgerows</p> <p>Species Otter; Water Vole; Pipistrelle; Brown Hare; Crayfish Grayling (fish); White Letter Hairstreak; Green Hairstreak; Blue Butterflies; Twite; Yellowhammer Lapwing; Lesser Twayblade; Marsh Fern</p> <p>Habitat Action Plans Enclosed pasture and hay meadow below open moorland; Rushes and wet flushes; Wide variety of invertebrates; Important for wading birds – snipe, curlew, lapwing and redshank</p>	<p>plan.</p>

APPENDIX B

Summary of Baseline Data and Sustainability Issues

This appendix provides a summary of the environmental baseline data for Bradford (**Table B.1**) and the key sustainability issues in the District (**Table B.2**). For complete information, please see the SA Scoping Report that is available online.

Table B.1: Summary of environmental baseline data in Bradford

Theme	Baseline data for Bradford	Data source			
Population					
Population Growth	524,600 (mid 2012) 532,500 (mid 2016) 534,800 (mid 2017)	Mid-Year Population Estimates 2017 (ONS, June 2018) Bradford District Population Update – Intelligence Bulletin (CBMDC, July 2018)			
Population Growth	The Sub-National Population Projections from 2016 to 2039 for Bradford District show an increase in population of 9.1% with an additional 49,000 people predicted to live in the area. The same projections show that the population will increase by 4.3% to 557,100 in 2026 and by a further 4% to 579,000 by the proposed end of the plan period in 2037.	Sub-National Population Projections 2014-based (ONS, May 2016)			
Population Age Structure	Age group	2016	2026	2037	Sub-National Population Projections 2014-based (ONS, May 2016)
	0 - 4	7.5%	7.0%	6.8%	
	5 - 19	21.2%	21.0%	19.7%	
	20 - 49	40.0%	37.9%	37.2%	
	50 – 64	16.8%	17.2%	16.1%	
	65 – 84	12.5%	14.5%	16.5%	
85+	1.9%	2.4%	3.6%		
Population Ethnicity	White British: 63.9% Pakistani: 20.4% White Irish/Other: 3.5% Indian: 2.6% Mixed Heritage: 2.5% Bangladeshi: 1.9% Other Asian: 1.5% Other ethnic groups: 1.5% African: 1% Caribbean: 0.7% Chinese: 0.4% Other Black: 0.1% Gypsy or Irish Traveller: 0.1%	Census 2011 - Ethnic Group, Local Authorities in England and Wales (ONS, 2012) Ethnicity in Bradford – Intelligence Bulletin (CBMDC, January 2017)			
Crime	Crime Rate of 133.59 per 1000 population as recorded for year ending June 2018.	https://www.police.uk/west-yorkshire/BDT_CI/performance/compare-your-area/			

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford			Data source
Housing				
Household Growth	2014-based			<p>Household Projections for England and Local Authority Districts 2014-based (ONS, July 2016)</p> <p>Household Projections for Local Authorities and Higher Administrative Areas in England 2016-based (ONS, December 2018).</p> <p>Government guidance and the national formula for measuring housing need is based on the 2014 based projections.</p>
	Year	Household Size	Households	
	2014	2.57	202,850	
	2019	2.54	211,546	
	2024	2.50	218,320	
	2029	2.45	226,381	
	2034	2.41	235,222	
	2039	2.38	240,563	
	2016-based			
	Year	Household Size	Households	
	2016	2.61	200,922	
	2021	2.61	203,696	
	2026	2.58	207,929	
	2031	2.53	212,384	
	2036	2.49	216,535	
	2041	2.47	219,926	
	2016-based			

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford			Data source
	Projected Households by Age			
	Age Group	Year 2016	Year 2041	
	Under 25	6,659	6,401	
	25 to 34	29,428	27,316	
	35 to 44	39,762	34,338	
	45 to 54	41,211	38,868	
	55 to 64	33,913	36,853	
	65 to 74	24,891	32,268	
	75 to 84	17,788	29,656	
	85+	7,270	14,227	
	2014-based			
	Projected Households by Age			
	Age Group	Year 2014	Year 2039	
	Under 25	66,291	71,344	
	25 to 34	74,618	76,629	
	35 to 44	69,796	68,105	
	45 to 54	66,930	66,810	
	55 to 64	28,985	32,359	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford					Data source
	65 to 74	25,521	28,263			
	75 to 84	39,293	55,301			
	85+	24,328	39,677			
Dwelling Stock by Tenure	Owner Occupied (Owned Outright): 29.3% Owner Occupied (Owned with Mortgage): 35.7% Private Rented: 18.1% Social Rented: 14.8% Share Ownership: 0.6% Other: 1.5%					Census 2011: Tenure, Local Authorities in England and Wales (ONS, 2012) 2011 Census Release 2.1: Key Statistics for Local Authorities - Bradford District 11 December 2012 (CBMDC, December 2012)
Household Types	Detached (Whole House or Bungalow): 14% Semi-Detached (Whole House or Bungalow): 35.6% Terraced (Whole House of Bungalow) (Inc. end terrace): 34.4% Flat, Maisonette or Apartment: 15.8% Other: 0.3%					2011 Census: Dwellings, Household Spaces and Accommodation type, local authorities in England and Wales (ONS, 2012)
House Prices	Average House Price in Bradford District (September 2018): £140,264					UK House Price Index, Land Registry (September 2018)
Housing Affordability	ONS Property Price to Earnings Ratio for Bradford District: 5.2 (2017)					Ratio of house price to residence-based earnings (lower quartile and median), 2002 to 2017 (ONS) NOMIS data
Net Housing Completions	Bradford Housing Requirement: 2,700 dwellings per annum. Net Housing Completions 2006/2007: 1,578 2007/2008: 2,156 2008/2009: 1,440 2009/2010: 999 2010/2011: 696 2011/2012: 733 2012/2013: 721 2013/2014: 874 2014/2015: 1,134 2015/2016: 1,338 2016/2017: 1,488 2017/2018: 1,438					Leeds City Region Annual Monitoring Report 2017-2018 Housing Land Supply Update (CBMDC, December 2018)
	Adopted Core Strategy Target	No. new homes completed (net)	No. on PDL	Proportion on PDL	Core Strategy Target	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford						Data source
	Regional City	27,750	3,743	3,199	85%	55%	
	Principal Towns	6,900	916	671	73%	50%	
	Local Growth Centres	4,900	1,024	378	37%	15%	
	Local Service Centres	2,550	590	334	57%	35%	
	DISTRICT TOTAL	42,100	6,273	4,581	73%	50%	
Housing Stock Conditions	<p>For all stock, Bradford performs better than the EHS England average for excess cold (4% compared to 6%), marginally better for all hazards, but worse for all other indicators. In particular disrepair (8% in Bradford compared to 5% nationally). It is noteworthy that the levels of excess cold are relatively low in Bradford. This has helped to keep the overall HHSRS levels slightly lower than the average for England despite having slightly higher levels of fall hazards.</p> <p>Comparing Bradford to the EHS England average figures for the private sector stock there is a similar picture with Bradford performing better for excess cold (4% compared to 7%) and all hazards (16% compared with 17%) but worse or similar for all other indicators. Bradford has similar levels to the region of Yorkshire and The Humber for each of the indicators – although some are slightly higher in Bradford for example falls (12% in Bradford compared with 11%), fuel poverty (LIHC being 12% in Bradford compared with 11%) and low income households (30% in Bradford compared with 26%).</p> <p>The average SimpleSAP ratings in Bradford (Figure 7) are higher than those for the regional and England averages for both all stock and the private sector stock</p>						BRE Integrated Dwelling Level Housing Stock Modelling and Database for Bradford Metropolitan District Council BRE, May 2016)
Empty Homes	Date	All	Long Term				<p>Live Tables – Table 615: Vacant Dwellings by Local Authority District (MHCLG)</p> <p>Tackling Empty Homes in the Bradford District: Delivery Plan 2017-2019 (CBMDC, 2017)</p>
	Oct 2017	8,751	3,931				
	Oct 2016	8,914	3,944				
	Oct 2015	9,277	4,154				
	Oct 2014	9,778	3,942				
	Oct 2013	10,277	3,953				
	Oct 2012	10,548	4,766				
	Oct 2011	11,210	5,358				
Health and inequalities							

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford	Data source																												
Deprivation	Index of Multiple Deprivation Rank: 19	English Indices of Deprivation 2015 (DCLG, September 2015). English Indices of Deprivation 2015 Bradford District in focus (CBMDC, October 2015)																												
Poverty	<p>Bradford ranks as the 5th most income deprived District in England. There are wide variations around the District with 27% of the District’s population classed as in the 10% most deprived areas in England, and 6% of the population living in areas classed as in the 10% least deprived areas. The most income deprived areas are located in and around central Bradford and Keighley and the least deprived areas are located in the Wharfe and Aire valleys and villages to the north and west of central Bradford.</p> <p>In the sub-region, Leeds which is ranked 3rd most income deprived District in England. All the other local authority areas in West Yorkshire are ranked higher than Bradford – Kirklees is 16th, Wakefield is 33rd and Calderdale is 77th</p> <p>Employment Deprivation: Bradford is ranked 6th most employment deprived local authority in England – this is the same position as in both 2007 and 2010. Birmingham is the most employment deprived local authority in England. Leeds is the most employment deprived local authority in West Yorkshire and is ranked 3rd most employment deprived District in England. All the other local authority areas in West Yorkshire are ranked higher than Bradford – Kirklees is 11th, Wakefield is 17th and Calderdale is 73rd</p> <p>Fuel poverty: The latest official fuel poverty statistics show that there were 20,095 households (14.3%) in Bradford District considered to be in fuel poverty according to the ‘Low Income, High Cost’ methodology. This is higher than the rates for Yorkshire and the Humber region (12.1%) and England (11.1%).</p> <p>Child Poverty: The most recent national child poverty data for 2016/15 (published 2018) reported a child poverty rate of 21.8% for Bradford District, compared to 16.6% for England – with 31,580 children and young people aged 0 – 19, living in households with less than 60% of average (median) income. In 2015, the District’s child poverty rate was second highest in the Yorkshire and Humber region</p>	English Indices of Deprivation 2015 (DCLG, September 2015). Poverty & Deprivation – Intelligence Bulletin (CBMDC, October 2018) Sub-Regional Fuel Poverty, England 2016 (DECC) Households Below Average Income (ONS)																												
Education & Skills	<table border="1" data-bbox="398 995 1536 1388"> <thead> <tr> <th colspan="4" data-bbox="398 995 1536 1023">Adult Qualification Levels</th> </tr> <tr> <th data-bbox="398 1023 647 1082"></th> <th data-bbox="647 1023 893 1082">Bradford</th> <th data-bbox="893 1023 1140 1082">Yorkshire & Humber</th> <th data-bbox="1140 1023 1536 1082">Great Britain</th> </tr> </thead> <tbody> <tr> <td data-bbox="398 1082 647 1141">NVQ4 and above</td> <td data-bbox="647 1082 893 1141">26.5%</td> <td data-bbox="893 1082 1140 1141">33%</td> <td data-bbox="1140 1082 1536 1141">38.6%</td> </tr> <tr> <td data-bbox="398 1141 647 1200">NVQ3 and above</td> <td data-bbox="647 1141 893 1200">46.6%</td> <td data-bbox="893 1141 1140 1200">52.3%</td> <td data-bbox="1140 1141 1536 1200">57.2%</td> </tr> <tr> <td data-bbox="398 1200 647 1259">NVQ2 and above</td> <td data-bbox="647 1200 893 1259">65.6%</td> <td data-bbox="893 1200 1140 1259">71.1%</td> <td data-bbox="1140 1200 1536 1259">74.7%</td> </tr> <tr> <td data-bbox="398 1259 647 1318">NVQ1 and above</td> <td data-bbox="647 1259 893 1318">78.7%</td> <td data-bbox="893 1259 1140 1318">83.4%</td> <td data-bbox="1140 1259 1536 1318">85.4%</td> </tr> <tr> <td data-bbox="398 1318 647 1388">Other Qualifications</td> <td data-bbox="647 1318 893 1388">8.2%</td> <td data-bbox="893 1318 1140 1388">7%</td> <td data-bbox="1140 1318 1536 1388">6.9%</td> </tr> </tbody> </table>	Adult Qualification Levels					Bradford	Yorkshire & Humber	Great Britain	NVQ4 and above	26.5%	33%	38.6%	NVQ3 and above	46.6%	52.3%	57.2%	NVQ2 and above	65.6%	71.1%	74.7%	NVQ1 and above	78.7%	83.4%	85.4%	Other Qualifications	8.2%	7%	6.9%	Nomis ONS Annual Population Survey (January to December 2017)
Adult Qualification Levels																														
	Bradford	Yorkshire & Humber	Great Britain																											
NVQ4 and above	26.5%	33%	38.6%																											
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NVQ1 and above	78.7%	83.4%	85.4%																											
Other Qualifications	8.2%	7%	6.9%																											

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source						
	No Qualifications	13.1%	9.5%	7.7%							
	<p>No Qualifications - No formal qualifications held. Other Qualifications - includes foreign qualifications and some professional qualifications. NVQ 1 Equivalent - e.g. fewer than 5 GCSEs at grades A-C, foundation GNVQ, NVQ 1, intermediate 1 national qualification (Scotland) or equivalent. NVQ 2 Equivalent - e.g. 5 or more GCSEs at grades A-C, intermediate GNVQ, NVQ 2, intermediate 2 national qualification (Scotland) or equivalent. NVQ 3 Equivalent - e.g. 2 or more A levels, advanced GNVQ, NVQ 3, 2 or more higher or advanced higher national qualifications (Scotland) or equivalent. NVQ 4 Equivalent and Above - e.g. HND, Degree and Higher Degree level qualifications or equivalent.</p>										
Life Expectancy		Male	Female		Life Expectancy (LE) at Birth & Age 65 - By sex, UK (2001 to 2003 to 2015 to 2017) (ONS, 2018) Life Expectancy at Birth & Age 65 – Intelligence Bulletin (CBMDC, January 2018)						
	Bradford District	77.5	81.5								
	Yorkshire & Humber	78.7	82.4								
	England	79.5	83.1								
	Data from 2014 – 2016										
Obesity	38.2% of the District's 10 to 11-year olds are overweight compared to 34.6% of 10 to 11-year olds regionally and 34.6% nationally				National Child Measurement Programme 2016/17, published 19/10/17, NHS Digital Quality Outcomes Framework, NHS						
Health	At a District wide level based on Quality Outcomes Framework (QOF) data registrations with GPs by condition: 56,891 adults were registered as obese with their GP in 2014-15. This is equivalent to 12% of the District population aged 17+ and higher than the national rate of 9%.				Local Authority Health Profile 2018 - Bradford (Public Health England, July 2018)						
Physical Inactivity	The main causes of death in Bradford District are the same as other parts of the country – cardiovascular disease, respiratory disease and cancer. However, more people die before the age of 75 in the District than in other parts of the country. In some parts of the District as many as 1 in 2 people die before the age of 75.				Bradford District Joint Strategy Needs Assessment/Public Health England Data						
Economy											
Economic Performance	Bradford District's GVA (as of 2016) was £10.05bn, representing 8.7% of the regional total. GVA growth (2015/16) was 2.1% GVA per head of population (2016): £18,810 Bradford's job density is low. Bradford has 690 jobs per thousand work age population compared to 840 nationally.				Gross Value Added – Intelligence Bulletin (CBMDC, December 2017) Centre for Cities Outlook Report 2018 Made in Bradford - Pioneering, Confident & Connected an Economic Strategy for Bradford District 2018-2030						
Employment and Economic Structure	Employment by Occupation (Ages 16 to 64) <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Bradford</th> <th>Great Britain</th> </tr> </thead> <tbody> <tr> <td>_____</td> <td></td> <td></td> </tr> </tbody> </table>					Bradford	Great Britain	_____			Nomis ONS Annual Population Survey (July 2017 to June 2018)
	Bradford	Great Britain									

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford			Data source
	Soc 2010: Major Group 1 to 3	36.8%	45.9%	
	1. <i>Managers, Directors & Senior Officials</i>	8.7%	10.9%	
	2. <i>Professional Occupations</i>	16.3%	20.3%	
	3. <i>Associate Professional & Technical</i>	11.5%	14.5%	
	Soc 2010 Major Group 4-5	21.9%	20.4%	
	4. <i>Administrative & Secretarial</i>	11.4%	10.2%	
	5. <i>Skilled Trades Occupations</i>	10.3%	10.1	
	Soc 2010: Major Group 6-7	19.6%	16.7%	
	6. <i>Caring, Leisure & Other Service Occupations</i>	11.0%	9%	
	7. <i>Sales & Customer Service Occupations</i>	8.4%	7.6%	
	Soc 2010: Major Group 8-9	21.7%	17%	
	8. <i>Process Plant & Machine Operatives</i>	9.7%	6.3%	
9. <i>Elementary Occupations</i>	11.9%	10.6%		
Earnings		Bradford	Great Britain	ONS Annual Survey of Hours & Earnings – Workplace Analysis - Nomis ONS Annual Population Survey (January to December 2017) Employment & Skills – Intelligence Bulletin (CBMDC, November 2016)
	Gross Weekly Pay (Full Time)	£498.20	£570.90	
	<i>Male Workers (Full Time)</i>	£545.80	£611.80	
	<i>Female Workers (Full Time)</i>	£453.00	£509.80	
Economic Activity & Employment	Economic Inactivity Rates (July 2012 to June 2018) (Ages 16 to 64)			Nomis ONS Annual Population Survey Bradford District Monthly Unemployment Update – Intelligence Bulletin (CBMDC, December 2018) Made in Bradford - Pioneering, Confident & Connected an Economic Strategy for Bradford District 2018-2030
		Bradford	England	
	July 2012 to June 2013	26.9%	23.1%	
	July 2013 to June 2014	26.5%	22.7%	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford					Data source		
	July 2014 to June 2015	28.4%	22.5%					
	July 2015 to June 2016	28.3%	22.1%					
	July 2016 to June 2017	27.8%	22.0%					
	July 2017 to June 2018	28.6%	21.6%					
	Economic Activity Rates (July 2012 to June 2018) (Ages 16 to 64)							
			Bradford	Great Britain				
	July 2012 to June 2013	65.6%	70.9%					
	July 2013 to June 2014	66.1%	71.9%					
	July 2014 to June 2015	64.9%	73%					
	July 2015 to June 2016	65.1%	73.8%					
	July 2016 to June 2017	67.8%	74.2%					
	July 2017 to June 2018	68.1%	75%					
Employment Land	Total Additional Employment Floorspace						Annual Monitoring Reports (2013 to 2017) (CBMDC)	
		2012/13	2013/14	2014/15	2015/16	2016/17		
	Gross Internal Floorspace (m ²)	1,680	5,065	5,614	18,652	No date available		
Net Internal Floorspace (m ²)	1,617	5,065	-	-	-			
City Centre	<p>The city centre remains the key location for employment in the District, particularly office-based employment. There are 33,500 jobs located in Bradford city centre which is one in six jobs in Bradford. There are 10,700 jobs in financial and business services, 10,500 in the public sector, 3,800 in retail and 1,700 in accommodation and food services based in the city centre.</p> <p>Bradford's city centre is a top UK retail centre generating £423 million of comparison retail expenditure in 2015 according to CACI Retail Footprint data.</p> <p>There is a strong and vibrant presence of cultural and visitor attractions in the city centre. In 2013 an estimated 4m people visited City Park, whilst the National Media Museum (circa 500,000 visitors), Alhambra Theatre (250,000 theatregoers), St Georges Hall and The Leisure Exchange are jointly seeing</p>					<p>Made in Bradford - Pioneering, Confident & Connected An Economic Strategy for Bradford District 2018-2030 Bradford Council economy webpages Bradford City Centre AAP</p>		

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford	Data source	
	<p>nearly 1million visitors per annum go through their doors. Bradford is also the world's first UNESCO City of Film and plays host to the annual Bradford International Film Festival at the National Media Museum and its associated cinemas. Bradford city centre is also home to both the University of Bradford and Bradford College.</p>		
Natural Environment			
Landscape	<p>National Park: - Yorkshire Dales National Park Area of Outstanding Natural Beauty (AONB) - Nidderdale The District is located with three National Landscape Character Areas as defined by Natural England: - NCA36: Southern Pennines - NCA37: Yorkshire Southern Pennine Edge • - NCA38: Nottinghamshire, Derbyshire & Yorkshire Coalfield</p>	<p>DEFRA Magic Maps NCA Profile 36: Southern Pennines (Natural England, July 2017) NCA Profile 37: Yorkshire Southern Pennine Edge (Natural England, 2013) NCA Profile: 38. Nottinghamshire, Derbyshire and Yorkshire Coalfield (Natural England, 2013)</p>	
Biodiversity	HABITATS FOUND IN THE BRADFORD DISTRICT		<p>Biodiversity 2020: A Strategy for England's Wildlife & Ecosystem Services (DEFRA, 2011) Bradford Council Website – Biodiversity</p>
	National/Yorkshire and Humberside Key Habitats		
	Species Rich Hedgerows*	Upland Oakwood*	
	Lowland Heathland Upland	Upland Mixed Ashwood	
	Upland Heathland	Wet Woodlands	
	Fens	Lowland Hay Meadow	
	Reedbeds	Lowland Dry Acid Grassland	
	Blanket Bog		
	Local Key Habitats**		
	In-Bye Pasture*	River Corridors*	
	SPECIES FOUND IN THE BRADFORD DISTRICT		
	National/Yorkshire and Humberside Key Species		
	Water vole*	Linnet	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford	Data source																										
	<table border="1"> <tr> <td data-bbox="405 228 1055 276">Brown Hare</td> <td data-bbox="1066 228 1532 276">Tree Sparrow</td> </tr> <tr> <td data-bbox="405 284 1055 331">Otter*</td> <td data-bbox="1066 284 1532 331">Spotted Flycatcher</td> </tr> <tr> <td data-bbox="405 339 1055 387">Pipistrelle*</td> <td data-bbox="1066 339 1532 387">Black Grouse</td> </tr> <tr> <td data-bbox="405 395 1055 443">Skylark</td> <td data-bbox="1066 395 1532 443">Song Thrush</td> </tr> <tr> <td data-bbox="405 451 1055 499">Reed Bunting</td> <td data-bbox="1066 451 1532 499">White Clawed Crayfish*</td> </tr> <tr> <td data-bbox="405 507 1055 555">Bullfinch</td> <td data-bbox="1066 507 1532 555">Killarney Fern</td> </tr> <tr> <td data-bbox="405 563 1055 611">Grey Partridge</td> <td data-bbox="1066 563 1532 611"></td> </tr> <tr> <td colspan="2" data-bbox="405 619 1532 667">Local Key Species**</td> </tr> <tr> <td data-bbox="405 675 1055 722">Lesser Twayblade*</td> <td data-bbox="1066 675 1532 722">Yellowhammer*</td> </tr> <tr> <td data-bbox="405 730 1055 778">Lapwing*</td> <td data-bbox="1066 730 1532 778">Twite*</td> </tr> <tr> <td data-bbox="405 786 1055 834">Green Hairstreak Butterfly*</td> <td data-bbox="1066 786 1532 834">White Letter Hairstreak</td> </tr> <tr> <td data-bbox="405 842 1055 890">Blue Butterflies*</td> <td data-bbox="1066 842 1532 890">Butterfly*</td> </tr> <tr> <td colspan="2" data-bbox="405 898 1532 1007">**Selected by the Bradford Biodiversity Partnership as being locally significant in the Bradford District</td> </tr> </table>	Brown Hare	Tree Sparrow	Otter*	Spotted Flycatcher	Pipistrelle*	Black Grouse	Skylark	Song Thrush	Reed Bunting	White Clawed Crayfish*	Bullfinch	Killarney Fern	Grey Partridge		Local Key Species**		Lesser Twayblade*	Yellowhammer*	Lapwing*	Twite*	Green Hairstreak Butterfly*	White Letter Hairstreak	Blue Butterflies*	Butterfly*	**Selected by the Bradford Biodiversity Partnership as being locally significant in the Bradford District		
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**Selected by the Bradford Biodiversity Partnership as being locally significant in the Bradford District																												
EU Habitats Sites	<p>Special Area of Conservation (in Bradford District)</p> <ul style="list-style-type: none"> - South Pennine Moors (65,025.5ha) <p>Special Areas of Conservation (within 20km):</p> <ul style="list-style-type: none"> - North Pennine Moors - Craven Limestone Complex - Denby Grange Colliery Ponds <p>Special Protection Areas (in Bradford District):</p> <ul style="list-style-type: none"> - South Pennine Moors Phase 2 <p>Special Protection Areas (within 20km):</p> <ul style="list-style-type: none"> - North Pennine Moors - South Pennine Moors Phase 1 	DEFRA Magic Maps																										
Nature Conservation Sites	<p>Sites of Special Scientific Interest</p> <ul style="list-style-type: none"> - South Pennine Moors (20,944ha) - Bingley South Bog (4.45ha) - Trench Meadows (4.8ha) 	DEFRA Magic Maps Bradford Council Website - Biodiversity																										

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford	Data source
	<p>Sites of Ecological/Geological Importance – 22 Bradford Wildlife Areas - 152</p>	
Minerals	<p>The principle mineral resources in Bradford District are: Sandstone – capable of being used for high quality building, roofing and paving stones. The primary commodity extracted in the area. Sand & Gravel – no significant sand extraction has taken place in the District from some years. Fireclay – this is extracted at two sites in the area for brick making and engineering purposes Coal – no significant extraction of coal has taken place in the District for some years.</p>	<p>Bradford Local Plan Core Strategy – Minerals Chapter (CBMDC, July 2017) Bradford Local Plan Core Strategy DPD – Appendix 13 (CBMDC, July 2017) Mineral Resource Information in Support of National, Regional & Local Planning: West Yorkshire – Report (British Geological Survey, 2006) Mineral Resource Information in Support of National, Regional & Local Planning: West Yorkshire – Map (British Geological Survey, 2006)</p>
Flooding	<p>There are a number of sources of flooding across Bradford District. Main Rivers The main rivers in the area are found in two catchments:</p> <ul style="list-style-type: none"> • Aire & Calder Catchment • River Aire • River Worth • North Beck (part) • Silsden Beck • Bridgehouse Beck • Eastburn Beck • Providence Lane • Nab Wood Beck • Wharfe & Lower Ouse Catchment • River Wharfe • Town Beck • Backstone Beck <p>Ordinary Watercourse Flooding Ordinary watercourses in the Aire catchment from Steeton Ings to the Craven Boundary are managed by both the Airedale IDB and CBMDC. The vast network of ordinary watercourses in Bradford District, many of which are unmapped. Most notably, Bradford Beck which traverses Bradford City Centre and the many tributaries such as Pitty Beck, Chellow Dene Beck, Eastbrook, Westbrook and Bowling Beck Surface Water Flooding Surface water and drainage related issues are known to cause flood risk in Idle, Apperley Bridge, Addingham, Silsden, Cross Hills on Skipton Road and Bradford City Centre, Mill Hey, Haworth, Keighley, Castlefields industrial estate, Bingley. Groundwater Flooding Bradford has a high proportion of properties with cellars compared to many other cities in the UK and has recorded between 550 and 725 calls per year regarding flooded cellars. Possible flood sources include groundwater.</p>	<p>Bradford Local Flood Risk Management Strategy (CBMDC, December 2016) Strategic Flood Risk Assessment, Level 1 (SFRA), Final Draft Report amended February 2014 (CBMDC, 2014)</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford	Data source
	<p>Sewer Flooding Within many areas of CBMDC surface water runoff is channelled into the combined sewer system. During wet weather, the capacity of the system is often exceeded or affected by blockage and this is managed through Combined Sewer Overflows (CSOs) which discharge to watercourses and exist in considerable numbers within the Bradford District.</p> <p>Reservoir Flooding There are a number of reservoirs within the Bradford District. These are the responsibility of either YWS Ltd or in the case of Upper and Lower Chellow, Harold Park and Park Dam, the CBMDC.</p> <p>Canal Flooding The Leeds and Liverpool canal runs through Bradford District and is managed by the Canal and River Trust.</p>	
Built Environment		
Heritage	<p>The historic environment of Bradford District is significant.</p> <p>World Heritage Site: 1 (Saltaire)</p> <p>Conservation Areas: 59</p> <p>Scheduled Ancient Monuments: 194</p> <p>Listings Buildings: 2,287 (23 of which are Grade I listed)</p> <p>Registered Historic Parks and Garden: 14</p> <p>Historic Battlefield Site: 1 (Adwalton Moor, Tong)</p> <p>At Risk Register: 11 of the area's listed buildings are on Historic England's "Heritage at Risk" register, whilst 11 of conservation areas are at risk – categorised as deteriorating and in either "poor" or "very bad" condition.</p>	<p>DEFRA Magic Map</p> <p>National Heritage List for England (Historic England)</p> <p>Heritage at Risk Register (Historic England)</p> <p>Heritage & Culture – Intelligence Bulletin (CBMDC, November 2018)</p> <p>Conservation Area Assessments & Management Plans (CBMDC)</p> <p>Saltaire World Heritage Site Management Plan (CBMDC, 2014)</p>
Connectivity		
Roads/ Congestion	<p>The transport network in the urban area of Bradford City is strongly characterised by a radial pattern of routes leading to the city centre, though there is also an outer and an inner ring road.</p> <p>The main routes to the north of the District follow or link Airedale and Wharfedale and there is also an important network of routes serving Keighley and smaller settlements to the west of the District.</p> <p>There are 1,900km of roads in Bradford District, which it is the responsibility of the Council to maintain. Along these routes there are 400 road bridges, 1,000 retaining walls, 300 footbridges, 57,000 streetlights, 337 traffic signal junctions and pelican crossings and 8,000 illuminated signs / bollards.</p> <p>Bradford has significant air quality problems, mainly attributable to transport.</p>	<p>West Yorkshire Local Transport Plan 2011 – 2026 (LTP3) - Bradford Local Implementation Plan</p> <p>Bradford Local Plan – Core Strategy DPD (July 2017) – Planning for Prosperity: Transport & Movement Chapter</p>
Public Transport (Bus & Rail)	<p>There is an extensive public transport network across the District including a well-used local rail system serving Airedale and Wharfedale and directly linking to Leeds, Calderdale 5 and Greater Manchester.</p> <p>At peak times there is crowding on some rail services and the quality of the rolling stock on the Calderdale line is poor.</p> <p>There is also a high level of bus use throughout the urban area which is encouraged by a generally good quality and high frequency network, though in common with other parts of West Yorkshire bus use has been declining in recent years and there have been some service cuts that have further discouraged the use of buses for travel.</p>	<p>West Yorkshire Local Transport Plan 2011 – 2026 (LTP3) - Bradford Local Implementation Plan</p> <p>Bradford Local Plan – Core Strategy DPD (July 2017) – Planning for Prosperity: Transport & Movement Chapter</p>
Climate and resources		
Air Quality	Since 1999, air quality has been monitored at four locations in Bradford District.	2017 Air Quality Annual Status Report

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source																																				
	<p>There are four declared Air Quality Management Areas (AQMAs):</p> <ul style="list-style-type: none"> - Manningham Lane - Thornton Road - Mayo Avenue/Manchester Road - Shipley Airedale Road <p>The AQMAs were declared for exceedances of both the annual and hourly objectives for nitrogen dioxide.</p> <p>There are also several areas of concern:</p> <ul style="list-style-type: none"> - Bingley Road - Canal Road, Bradford - Killinghall - Tong Lane 				(ASR) (CBMDC, February 2018)																																				
Per Capita Emissions in Local Authority Areas (KT of CO2)	<table border="1"> <thead> <tr> <th></th> <th>Bradford</th> <th>Yorkshire & Humber</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>2005</td> <td>6.4</td> <td>10.5</td> <td>8.5</td> </tr> <tr> <td>2006</td> <td>6.3</td> <td>10.3</td> <td>8.5</td> </tr> <tr> <td>2007</td> <td>6.1</td> <td>10.0</td> <td>8.2</td> </tr> <tr> <td>2008</td> <td>5.8</td> <td>9.5</td> <td>7.9</td> </tr> <tr> <td>2009</td> <td>5.3</td> <td>8.3</td> <td>7.1</td> </tr> <tr> <td>2010</td> <td>5.5</td> <td>8.9</td> <td>7.3</td> </tr> <tr> <td>2011</td> <td>5.0</td> <td>8.2</td> <td>6.7</td> </tr> <tr> <td>2012</td> <td>5.2</td> <td>8.2</td> <td>7.0</td> </tr> </tbody> </table>					Bradford	Yorkshire & Humber	England	2005	6.4	10.5	8.5	2006	6.3	10.3	8.5	2007	6.1	10.0	8.2	2008	5.8	9.5	7.9	2009	5.3	8.3	7.1	2010	5.5	8.9	7.3	2011	5.0	8.2	6.7	2012	5.2	8.2	7.0	Local and Regional CO2 Emissions Estimates for 2005-2012 (Ricardo-AEA/DECC, June 2014)
	Bradford	Yorkshire & Humber	England																																						
2005	6.4	10.5	8.5																																						
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Water Quality	<p>River quality:</p> <p>There are a number of rivers which flow through the Bradford District. The District is covered by two surface water management catchment areas:</p> <ul style="list-style-type: none"> • Wharfe and Ouse Lower • Aire and Calder <p>Within these catchment areas there are a number of water bodies of varying quality. The information shows that the water quality is more likely to be poor in the urban areas such as the centre of Bradford, and in the becks to the south of the District which drain toward the Calder catchment. The Aire catchment tends to have better water quality until it reaches the confluence with Bradford beck in Shipley. The Wharfe water quality tends to be very good through the north of the District.</p>				Aire and Calder Management Catchment Data Wharfe and Ouse Lower Management Catchment Data																																				
Energy Consumption	Average Domestic Electricity Consumption per Household (kWh)				Regional & Local Authority Electricity Consumption Statistics (2005 to 2017) (BEIS, December 2018)																																				

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source	
		Bradford	Yorkshire & Humber	Great Britain	Regional & Local Authority Gas Consumption Statistics: (2005 to 2017) (BEIS, December 2018)	
	2012	4,007	3,929	4,261		
	2013	3,926	3,847	4,168		
	2014	3,930	3,848	4,162		
	2015	3,880	3,785	4,101		
	2016	3,745	3,678	3,982		
	2017	3,720	3,629	3,921		
	Median Average Domestic Gas Consumption per Household (kWh)					
		Bradford	Yorkshire & Humber	Great Britain		
	2012	14,585	13,248	12,660		
	2013	13,950	12,697	12,218		
	2014	13,536	12,316	11,788		
	2015	13,532	13,644	13,202		
	2016	13,323	13,418	13,057		
2017	13,806	12,529	11,949			
Waste	Local Authority Collected Waste in Bradford District (2014/15 to 2017/18)				Local Authority Collected Waste Statistics (DEFRA)	
		Household (Tonnes)	Non-Household (Tonnes)	Total LACW (Tonnes)		
	2014/15	197,455	29,191	225,646		
	2015/16	204,358	28,905	233,263		
	2016/17	201,190	30,263	231,453		

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford				Data source	
	2017/18	191,682	30,321	222,003		
	Management of Local Authority Collected Waste (2014/15 to 2017/18)					
		2014/15	2015/16	2016/17		2017/18
	Landfilled	43,366	39,511	17,711		10,095
	Incineration with EFW	66,880	88,521	97,398		114,495
	Incineration without EFW	0	2,623	0		153
	Recycled or Composted	115,791	91,879	92,433		79,753
	Other	-1	10,729	23,919		17,505
	Household Waste Arisings Per Household & Reuse/Recycling/Composting Rates (2014/15 to 2017/18)					
		Residual Household Waste Per Household (kg/household)		% of Household Waste Sent for Re-use, Recycling or Composting		
	2014/15	453.2		51.6%		
	2015/16	579.0		39.9%		
2016/17	593.3		37%			
2017/18	582.2		34.6%			
Soil	<p>Most of the agricultural land in Bradford consists of improved and semi-improved pastures on the upland fringes of the north-west of the District or the neutral (neither alkaline nor acidic) grasslands to the east and south of the City. Agriculture in Bradford is generally based around rearing stock, mainly sheep, although cattle rearing take place in areas along the river valleys and on the lowlands to the east of the District. Most of the farmland in Bradford District can be described as marginal, constrained by climate and physical topography. Nearly half of the farmland is classed as Grade 4 or 5; that is, land with severe limitations which significantly restricts the range of crops and is mainly suitable for pasture grazing. However, there are also some grade 3 lands made up of alluvial soils along the flood plains of the River Wharfe and River Aire which are more productive</p>					
Hazardous Installations	<p>Within Bradford District there are 8 sites classed as hazardous installations or COMAH establishments, licenced by the HSE. Sites using chemicals classed as major hazards with significant buffer zone:</p> <ul style="list-style-type: none"> • BASF PLC – Cleckheaton Road, Low Moor, Bradford, BD12 0JZ • Nufarm UK Ltd - Wyke Lane, Wyke, Bradford, BD12 9EJ 				COMAH Establishments – Public Information (Heath & Safety Executive)	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Theme	Baseline data for Bradford	Data source
	<p>Gas Holder sites run by British Gas/Transco:</p> <ul style="list-style-type: none"> • Marley Rd, Keighley, • Peace Street, Bradford • Canal Rd, Bradford <p>Other:</p> <ul style="list-style-type: none"> • Towler and Staines, Bradford Rd, Keighley (sell bottled gas) • Chellow Water Treatment Works, Haworth Rd, Bradford (Run by Yorkshire Water) • Towler and Staines 	

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Table B.2: Summary of key sustainability issues in Bradford

Topics	Sustainability Issues
<p>Communities, Population & Housing</p> <p><i>[Relevant SEA Topics: Population; Human health; Cultural heritage; and Materials assets]</i></p>	<p>Population - Bradford District's overall population is projected to continue to grow (births exceeding deaths), but at a lower projected rate than previously estimated. Continued trend forecast of people leaving Bradford for other parts of the UK – although the population projections for international migration continue to show more people coming to live in Bradford from overseas than emigrating.</p> <p>Age Profile - Lower median age (36) compared to England (39.8), and Yorkshire and the Humber Region average (40) and the second lowest in Yorkshire after Leeds (35.5). Bradford has a large proportion of younger people in its population – although this is expected to decline in the future in line with similar trends regionally and nationally. There is also a projected increase in population aged over 65.</p> <p>Ethnicity - Bradford District has a diverse ethnic population compared to the region and England as a whole. It has lower levels of people who identify themselves as White British but more who are from Asian or British Asian backgrounds. The area has the largest proportion of people of Pakistani origin in England.</p> <p>Crime - Police statistics indicate that the crime rate per 1000 of population (133.59) is higher than comparative areas, force average and other areas in Yorkshire.</p> <p>Households - Between 2016 and 2041 a projected fall in household size is predicted within Bradford District, with a reduction from 2.61 to 2.47 persons per household. The number of households in the District, based on current trends, is expected to grow by 8.6%.</p> <p>Dwelling tenure and type - In line with the national and regional picture, the largest percentages of dwellings in Bradford District are owner occupied. There is a higher proportion of privately rented dwellings compared to the national average (1.3% more). Bradford District has a lower proportion of detached dwellings than the Yorkshire and Humber region and England. However, the proportion of semi-detached dwellings is similar to the region, but greater than the national average. In comparison, the District has a higher percentage of terraced properties than the regional or national average reflecting historic housing and industrial development.</p> <p>Housing prices, affordability and empty units – The average house price is £140,264 which is lower than the West Yorkshire average of £157,921 and well below average for England. This figure however masks significant differences across the District. Viewed as a whole property in Bradford District is more affordable on average than our regional neighbours, with the average house price being 7.12 x average salary compared to 7.47 x average salary across Yorkshire and Humberside. There were 8,751 vacant dwellings in Bradford District in 2017, 3,931 of which had been empty for six months or more. While the number of empty homes in Bradford has declined by 14.8% overall in the five years to 2017, the figure for long-term vacant dwellings has remained stable, rising by 101 to 4,154 from 2013 to 2015 and then falling by 223 to the 2017 total of 3,931,</p> <p>Housing standards and delivery - For all stock, Bradford performs better than the English Housing Survey (EHS) England average for excess cold (4% compared to 6%), marginally better for all hazards, but worse for all other indicators. In particular disrepair (8% in Bradford compared to 5% nationally). It is noteworthy that the levels of excess cold are relatively low in Bradford. This has helped to keep the overall Housing Health and Safety Rating System (HHSRS) levels slightly lower than the average for England despite having slightly higher levels of fall hazards.</p> <p>Housing Delivery - The level of house building over the last decade peaked in 2007/2008. However, this declined since the onset of the post 2008 economic recession, with the lowest point being reached in 2010/2011. Since 2012/2013, house building has increased in the District returning to similar levels to that experienced in 2006/2007. The percentage of completions on previously developed land in excess existing targets.</p> <p>In terms of affordable housing provision, this has varied in the last few years. The high point was 2013/14 when 279 affordable dwellings were completed, whilst the lowest point saw 92 dwellings completed in 2015/2016. The level of affordable housing completions has been below</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Topics	Sustainability Issues
	existing targets.
<p>Health & Inequalities <i>[Relevant SEA Topics: Population; Human health; and Materials assets]</i></p>	<p>Deprivation - Bradford District ranks as the 19th most deprived District England. In particular, there are high levels of income and employment deprivation in a number of parts of the area. It will be important to ensure that emerging policies and proposals seek to improve the quality of life for all existing and future residents, particularly in deprived areas, and support community cohesion. The District is the 5th most income deprived and 6th most employment deprived in England. Income deprivation is focussed in and around central Bradford and Keighley. Other key deprivation measures show higher rates of fuel poverty and child poverty in the area. It will be important to ensure that emerging policies and proposals seek to improve the quality of life for all existing and future residents, particularly in deprived areas, and support community cohesion</p> <p>Education & Skills - Despite improvements in educational attainment, qualification levels among Bradford’s working age population are lower than the regional and national averages. This has a knock-on effect on the local economy and the type and nature of employment in the District. Emerging policies and proposals should support opportunities to improve infrastructure for education and access for all existing and future residents.</p> <p>Health - the general health of Bradford District’s population tends to be poorer than other parts of the country. This particularly the case in more deprived areas. The main causes of death in Bradford District are the same as other parts of the country – cardiovascular disease, respiratory disease and cancer. People are more likely to die before the age of 75 in the District than elsewhere. This is despite increase life expectancy; although it remains lower than average. It also varies across the area, depending where people live.</p> <p>Obesity is one of the biggest challenges to the health of residents today. It is a particular issue in the Bradford area with income, ethnicity and social deprivation known to have an impact on an individual’s weight. Physical activity rates are below the national average, contributing problems with ill health. Therefore, it will be important for policies should seek to ensure that opportunities are provided for local people to participate in physical activity in order to improve the health and well-being of the area.</p>
<p>Economy <i>[Relevant SEA Topics: Population; Human health; and Materials assets]</i></p>	<p>Economic Performance - the District’s economic, its Gross Value Added (GVA), was worth £10.05bn (8.7% of the overall Yorkshire & Humber economy). Whilst GVA continues increases it remains lower than the national and regional averages in terms of growth and GVA per head of population. The economy overall is worth circa £10 billion and is the ninth largest city economy in England. Bradford benefits from above average concentrations of high-value production businesses and employees across food manufacturing, engineering, chemicals, digital technologies, energy and utilities. Bradford productivity per worker at £49,900 is the highest of any city in the Northern Powerhouse. Recent estimates value Bradford’s exports as worth £2bn per year, equating to £10,500 per job.</p> <p>Employment/Unemployment - Bradford has lower levels of employment. However, the number of residents in employment continues to increase year-on-year. Unemployment remains above average. There are more people than average in Bradford employed in lower paid elementary occupations and fewer managers and directors than average. Wages in the District reflect the occupation profile of its employed residents and are lower than the national and regional averages.</p> <p>There is a need to ensure that incomes and skill levels are increased, particularly in those areas with high levels of deprivation. Policies and proposals will need to contributing increasing employment prospects for existing and future residents by providing sufficient employment land in the right locations and supporting upskilling and training for local people.</p> <p>Business - Bradford has 15,700 businesses employing 200,000 people. The number of businesses has increased by 20 per cent over the last three years, rising faster than Leeds City Region and UK rates of growth. The District has a number of large headquarters including the grocery giant Morrisons, Yorkshire Water, Yorkshire Building Society and Yorkshire’s largest family-owned company JCT600. Bradford based companies employ over 250,000 people across the UK with a combined turnover of over £30 billion. In late 2017, Bradford was named the best city in the UK to start a business by Barclays Bank. Bradford has been identified in Barclays Bank SME Growth Factor Index as the best</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Topics	Sustainability Issues
	place in the country to start up in business, which measures the strength of 12 key growth factors essential to business productivity – including road infrastructure and business churn rate.
<p>Natural Environment</p> <p><i>[Relevant SEA Topics: Biodiversity; Flora; Fauna; Soil; Water; Air; Climatic factors; Landscape; Cultural heritage; and Materials assets]</i></p>	<p>Biodiversity/Designations - The South Pennine Moors represent a significant proportion of heathland in England and show exceptional diversity compared to other examples in the European Union. As a Special Protection Area (SPA) and Special Area of Conservation (SAC), the South Pennine Moors are protected under the European Habitats Directive and European Birds Directive because they contain habitat types which are rare or threatened, and due to the importance of the breeding bird populations.</p> <p>In addition to the SPA and SAC the area also supports a range of wildlife habitats and species. These include a number of nationally identified priority habitats and species as well as number which are considered to locally important Emerging policies and proposals will need to give consideration to these species and habitats and their integrity. It will also be important to ensure that development in future contributes positively to on-going protection and enhancement of the area's ecological network.</p> <p>Landscape - The landscape is an important feature of the area, forming a key part of its identity. There is a need to ensure that these landscapes are protected and enhanced, particularly those elements that contribute to their distinctive character. Emerging policies and proposals should seek to maximise the benefits from the landscape character assessment to make decisions about the location and design of new development.</p> <p>Minerals - Bradford supports a number of mineral resources that do, or have the potential to contribute to supply, with sandstone being the principal mineral extracted in the area. There is a need to safeguard these mineral resources from inappropriate non-mineral development to ensure that they can contribute to maintaining supply. However, in with national policy greater use needs to be made of secondary and recycled to reduce the need for primary mineral extraction.</p> <p>Flooding - There are a number of sources of flood risk within Bradford District. The impact of development on water management in the area will need to be taken into account. This should include assessing the risk of flooding, reducing that risk and mitigating its effects. Future development should contribute to reducing flood risk via the provision appropriate drainage infrastructure including the use of Sustainable Urban Drainage Systems (SUDS).</p>
<p>Built Environment</p> <p><i>[Relevant SEA Topics: Population; Human health; Materials assets; and Cultural heritage]</i></p>	<p>Heritage - Bradford District has an array for designated historic assets that contribute local distinctiveness. These assets are highly valued for the positive contribution they make to the quality of the environment as well as the benefits to the local economy and tourism. These important assets include the Saltaire World Heritage Site, 57 Conservation Areas, 2,287 listed buildings, 14 Registered Historic Parks & Gardens and 1 Historic Battlefield Site. It is important that these assets together with their settings are protected and enhanced, and where appropriate their condition improved. Proposals and the design of new development will need to reflect their character, with Conservation Area Appraisals and the Saltaire World Heritage Site Management Plan and guidance used to inform them.</p>
<p>Connectivity</p> <p><i>[Relevant SEA Topics: Population; Human health; Materials assets; Climatic factors]</i></p>	<p>Transport - The District has an extensive road and public transport network that link its communities to one and other and provides access to employment and services for local people. The road network suffers for congestion resulting in poor air quality in a number of locations. Emerging policies and proposals will need to support a reduction in congestion and emissions levels in order to improve air quality (as well as public health), reducing the need to travel by private car to access employment and services and increased opportunities for the use of sustainable transport modes (public transport, walking and cycling).</p>
<p>Climate & Resources</p> <p><i>[Relevant SEA Topics:</i></p>	<p>Air Quality - poor air quality is a key issue for the Bradford District, and the health of its population. A significant source of pollution is traffic, although other sources also contribute. It is important the air quality is maintained and improved in line with national standards and via the</p>

Appendix B – Summary of the Baseline Data and Key Sustainability Issues

Topics	Sustainability Issues
<p><i>Biodiversity; Flora; Fauna; Soil; Water; Air; Climatic factors; Landscape; Cultural heritage; and Materials assets]</i></p>	<p>implementation of best practice measures. CO₂ emissions per capita are lower than regional and national levels. Overall, policies and proposals should seek to secure a reduction in emissions from all sources that contribute to poor air quality.</p> <p>Water Quality - The quality of the various rivers within the District varies with a number being classed as moderate or poor, thereby not meeting Water Framework Directive (WFD) standards. It is, therefore, important that water quality is improve in order to meet WFD standards, with emerging policies and proposals taking into account impacts on the water environment. Water resources also need to be safeguarded.</p> <p>Energy - The consumption of energy within the District is lower than the national and regional averages and fallen overall in recent years. It will be important to ensure that new development, as well as emerging policies and proposals seek to reduce energy consumption through the inclusion of energy efficiency.</p> <p>Waste - There is a need to reduce the amount of waste produced from all sources. Where it is produced, it needs to be managed in line with Waste Hierarchy. It is also increasingly viewed as important resource. The amount of Local Authority Collected Waste has shown an overall decline in recent years. Most of this is sent for re-use, recycling or composting. In level of household waste produced has declined, however the amount being re-used, recycled or composted has lower than the national targets. Therefore, it is important that emerging policies and proposals seek to continue support the reduction in waste generated and encourage greater re-use, recycling and composting.</p>

APPENDIX C

Consultation Responses and Subsequent Amendments

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
CSPRQ020	I am not happy about Sustainability: It can be construed in many ways and I feel that the report does not holistically cover the impact on each person a decision may have at BMDC. For example, it may be sustainable for BMDC to amalgamate two workforces (Refuse with Parks) but the impact is that the services provided are either reduced, not done or are sub-standard. Thus, quality is not being sustained (so quality is not sustainable). Nothing is sustainable so please dont use a word that describes some kind of holistic circular approach when it does not work and is especially not used in favour to enhance the livelihood of the common person, only your own staff.	<p>A key purpose of SA/SEA is to determine and evaluate the extent to which options in the Plan, when considered alone and cumulatively, are environmentally, economically and socially sustainable.</p> <p>In terms of potential impacts on local people in Bradford including the provision of services they rely on, this will form an important consideration in the SA when appraising options against SA Objectives including:</p> <p>10. <i>'To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources'</i>.</p> <p>11. <i>'To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts...'</i></p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ051	No particular comments	Noted. No changes to the SA Scoping Report needed.
CSPRQ088	Very poorly done.	Noted. No changes to the SA Scoping Report needed.
CSPRQ024	The ever increasing human population is not sustainable. It is demanded by the capitqalist delusion that you must sell ever more things to ever more people. the capitalist system does not work. Every 20 years or so the whole thing crashes after a brief period of boom and virtually bankrupts the whole country and the people live in poverty for the succeeding twenty years bailing out the mess. Some better system is necessary.	Noted. No changes to the SA Scoping Report needed.
CSPRQ034	If you cannot recycle it then do not use it.	<p>When appraising options and proposals in the Plan against SA Objective 2 'To minimise waste and increase the amount of waste which is re-used, recycled and recovered', rates of recycling/reusing/composting will form a key consideration, as per the indicators presented in the SA Framework.</p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ039	don't forget sustainable transport	<p>Impacts of the Plan on sustainable transport, including local people's access to sustainable transport options, will form the primary consideration of appraisals of options against SA Objective 9:</p> <p>9. To develop and maintain an integrated and efficient transport network</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
		<p>which maximises access whilst minimizing detrimental impacts.</p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ046	<p>Comment on the Sustainability Appraisal, which is lacking key elements relating to the historic environment: p.15 Built Environment/ Heritage section - this ignores mention of nationally important Scheduled Monuments. The National Planning Policy Framework also recognises the importance of undesignated heritage assets and their settings & the need for the Planning system to protect them. p.22 Section 12. The term "archaeological" would usefully be added to the statement as in: "Number, or percentage or area of historic building, archaeological [added] sites and areas and their settings (both designated and non-designated) " p.72 Implications for Core Strategy: There is mention here of Listed Buildings & Conservation Areas but no mention of Scheduled Mon, uments or non-designated heritage assets (including archaeological remains)), which have policies designed for their protection in the NPPF.</p>	<p>Noted. The SA Objectives and PPP Review were updated to reflect these requested amendments.</p>
CSPRQ058	<p>Sustainability is subjective. Better to err on the side of caution.</p>	<p>In-line with best practice, the SA/SEA will conform with the precautionary principle i.e. where evidence is lacking to reach a conclusion, a precautionary approach is adopted, and the worst-case scenario is assumed and appropriate measures will be recommended to avoid or mitigate this potential outcome. This is due to be clarified and thoroughly explained in the full SA/SEA appraisal methodology provided in future SA/SEA reports.</p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ106	<p>The current core strategy and the Scoping Report contain many aspirations, but little detailed planning. Specific plans are needed in a number of areas. Examples include: Charging points for electric vehicles. More specific plans are required than in TR1 given that a University of Leeds study has shown that, over a 4 year period, electric vehicles are cheaper to own than diesel, petrol or plug in hybrid vehicles. The major barrier to EV uptake is the provision of charging points, especially for housing with no garage. Waste: the Council has made considerable progress in the treatment of waste and in recycling. More progress is needed in policies to eliminate single use plastics, a commitment to identify, in all cases, the destination and ultimate use of all the Council's recyclates and action on domestic food waste (National Infrastructure Commission Assessment recommends kerbside collection by 2025)..Air Quality: Bradford was recently identified by the Government as an air pollution hotspot and has four air quality management areas. What new plans does the Council now</p>	<p>The purpose of the scoping stage is to establish the scope of SA/SEA i.e. the spatial and temporal scope of the works as well as the baseline data to be used, key sustainability issues and themes as well as topics to be considered during SA/SEA.</p> <p>The SA/SEA will identify and evaluate the sustainability impacts of the Plan in detail at later stages of the programme. For example, when appraising the impacts of the Plan against SA Objective 9 'To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts', it is likely that the appraisal will consider the impacts on the provision and accessibility of electric car charging points.</p> <p>Options and proposals in the Plan will also be appraised in detail against SA Objectives 2 'To minimise waste and increase the amount of waste which is re-used, recycled and recovered', 4 'To safeguard and improve air, water and soil resources', 9 'To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts' and 10</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
	<p>have to improve air quality in Bradford, not only in the Air Quality Management areas, but throughout the District? How does the Council propose to access the Government funding that is available for this purpose and are there plans to work with the West Yorkshire LES?</p>	<p><i>'Reduce congestion and pollution by increasing transport choice and reducing the need to travel by lorry/private car'</i>. Between these objectives, the sustainability impacts of the Plan on waste and air quality will be thoroughly evaluated with recommendations for avoiding and mitigating adverse effects, and enhancing positive effects, provided throughout.</p> <p>No changes to the SA Scoping Report needed.</p>
<p>CSPRQ108</p>	<p>Needs further review going forward, likely further changes will have occurred when the inspector reviews the document next year?</p>	<p>At each iteration of the SA/SEA, the scoping report and its key elements will be updated as and where necessary. For example, baseline data may be updated with more recent and accurate data. Should any changes be made to the SA/SEA scope, this would be clearly noted and highlighted in the SA/SEA report.</p> <p>No changes to the SA Scoping Report needed.</p>
<p>CSPRQ110</p>	<p>Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)? Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9. Page 23, section 15 'indicators'. Which document provides evidence of 'More visitors to the District and greater spend' and 'Proportion of the District population undertaking regular physical activity' or has this evidence yet to be gathered?</p>	<p>Page 21, section 8 'indicators'. Which document provides evidence of the current % of developments with Sustainable Urban Drainage (SUDs)?</p> <ul style="list-style-type: none"> - This is currently no such document. <p>Page 21, section 9 'indicators'. Evidence of road traffic accidents should also be taken into account when developing section 9.</p> <ul style="list-style-type: none"> - Number of Road Traffic Accidents is already an indicator included in SA Objective 16 <i>'To improve safety and security for people and property'</i> <p>Page 23, section 15 'indicators'. Which document provides evidence of 'More visitors to the District and greater spend' and 'Proportion of the District population undertaking regular physical activity' or has this evidence yet to be gathered?</p> <ul style="list-style-type: none"> - Visitor data is monitored through Made in Bradford (http://madeinbradford.co.uk/projects/economic-growth-strategy/) e.g. 'Bradford attracts over ten million visitors a year with 784,000 visitors staying overnight. Visitor spend amounted to £430 million in 2015' - Physical Activity data is gathered by Born in Bradford (https://borninbradford.nhs.uk/research/how-to-access-data/) and is also monitored by Public Health England (https://fingertips.phe.org.uk/profile/physical-activity) <p>No changes to the SA Scoping Report needed.</p>
<p>CSPRQ111</p>	<p>The scoping report gives no sense of what are core issues and what are not. This is problematic as minor impacts appear to be being given</p>	<p>It is necessary for the SEA scoping stage to draw out the 'key sustainability issues'. These are set out in detail for each topic in Table 6.1 of the SA Scoping</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
	<p>equal weight to major ones. In addition there doesn't seem to be a mechanism for evaluating the cumulative affects of impacts or of offsetting positive and negative outcomes/consequences of development. Arguably a sustainability appraisal should deliver an assessment that is equivalent to a cost /benefit analysis (eg in some areas building homes at volume might necessitate substantial investment in costly road infrastructure that does little to support businesses and therefore contributes little to long term economic growth; in another area housing development may require investment in a road but if the road acts as a gateway to the development of land for employment there may be a big economic benefit). Cumulative effects of negative impacts seem to be being ignored or treated as equivalent to a single negative impact.</p>	<p>Report.</p> <p>It is not necessarily feasible or appropriate to evaluate the key sustainability issues and set them out in a hierarchy of which is most important.</p> <p>It is not intended for these appraisals or for the identification of cumulative effects to be provided at the Scoping stage, but rather subsequent stages in the SA/SEA process will provide a detailed account of the likely cumulative, synergistic and secondary effects of options and proposals in the Plan for each topic against each SA Objective. These appraisals will also provide a robust indication of the likely magnitude of effects. For example, a single site allocation for new homes may result in a minor increase in traffic and thus a minor impact on air quality through this pathway, whereas multiples sites of new homes will have a greater impact on traffic and thus a greater impact on air quality through this pathway.</p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ116	<p>"Since the Bradford District is one of poorer health and greater deprivation than the UK average, I think it is important not to allow housing developments and population growth to outpace the available NHS services and support, and the school services. Health and education services, when stretched to their limits, will inevitably result in poorer outcomes than where there is some spare capacity in the services for the population they are serving. Planning decisions seem to be overoptimistic as to how well the local services can cope with the extra people that arrive with large new developments.</p>	<p>The SA/SEA will carefully consider the accessibility of health services and facilities for existing and new local people, including GP surgeries and NHS hospitals. This is included as an indicator, 'Access to services and facilities' for SA Objective 17 <i>'To provide the conditions and services to improve health and well-being and reduce inequality to access to health and social care.'</i></p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ116	<p>I believe the Council should also tighten up the policy on protecting the open green spaces that are so important to both individual and social wellbeing. Planning policy appears to fail to qualify the value of green space. Developers offer the minimum square patch of neatly trimmed grass surrounded by tarmac, concrete, and uninspiring buildings, and with just a few token spindly saplings to replace beautiful mature trees felled to make room for the development. The replacement green patch, if it meets the required area, seems to be assessed as having the same value as mature trees, dry stone walls, babbling brooks and thriving wildlife of high biodiversity. Green space should be given a score as to its value in terms of public enjoyment and benefit to health and wellbeing, and then given the appropriate degree of protection.</p>	<p>As a result of the Scoping stage, appraisals carried out in the SA/SEA will carefully consider the impacts of proposals and options being considered for the Plan on open spaces and green spaces due to their value in terms of community cohesion, biodiversity, landscape and townscape character and the setting of heritage assets and historic areas. Where potential adverse effects are identified, recommendations will be made to help avoid or mitigate these.</p> <p>No changes to the SA Scoping Report needed.</p>
CSPRQ116	<p>Air quality is going to be of increasing concern and importance, and I think the Council needs to identify, as a matter of priority, the green wedges and corridors within and at the edge of the urban areas, that</p>	<p>Air quality will be a key consideration during the SA/SEA. Individual and cumulative impacts of all options and proposals on air quality will be accounted for in detail and thoroughly when identifying and evaluating the likely effects on</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (questionnaire)	Arcadis Response and changes made to SA/SEA
	<p>contribute positively and significantly to the flow of clean fresh air into the towns and cities, and which help to remove polluted air. Also it is important to recognize the value of trees in the urban environment in being able to absorb pollutants, and to increase the community's enjoyment and physical and mental health. Urban trees need to be given greater protection.</p>	<p>SA Objectives 4 <i>'To safeguard and improve air, water and soil resources'</i> and 10 <i>'Reduce congestion and pollution by increasing transport choice and reducing the need to travel by lorry/private car'</i>.</p> <p>The value of trees and other green infrastructure elements will form an important consideration in terms of avoiding and mitigating impacts on air quality. The protection and enhancement of the network of trees in Bradford will be an important consideration when appraising Options against SA Objective 5 <i>'To conserve and enhance the internationally, nationally and locally valued wildlife species and habitats'</i>.</p> <p>No changes to the SA Scoping Report needed.</p>
<p>CSPRQ116</p>	<p>Landscape Character Areas should also be given more protection.</p>	<p>Landscape Character Areas within and coincident with the Borough are identified in the Baseline Information, as presented in Appendix B of the Scoping Report. This baseline information is transposed into the SA Framework and so appraisals of options against SA Objective 6 <i>'To maintain, protect and enhance the character of area's natural and man-made landscapes'</i> would include consideration of how development conforms with landscape character areas.</p> <p>No changes to the SA Scoping Report needed.</p>

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (non-questionnaire)	Arcadis Response and changes made to SA/SEA
CSPR003	We do not have any comments to make regarding the Health Impact Assessment Scoping Report	Noted. No changes to the SA Scoping Report needed.
CSPR004	<ul style="list-style-type: none"> Table 7.2, SA Objective 12 - Object - It would be preferable if this SA Objective reflected the terminology used in the NPPF. Table 7.2, SA Objective 12 amend to read:- "To conserve and, where appropriate, enhance the significance of heritage assets and their setting" Appendix A, International Policies - Object - For completeness, this Section should also include the following: UNESCO World Heritage Convention Appendix A, Local Policies - Object - For completeness, this Section should also include the following: Saltaire World Heritage Site Management Plan 	<p>SA Objective on cultural heritage has been reworded to "To conserve and, where appropriate, enhance the significance of heritage assets and their setting.</p> <p>Appendix A PPP Review has been updated to include the UNESCO World Heritage Convention as well as the Saltaire World Heritage Site Management Plan.</p>
CSPR019	Craven District Council has no specific comment to make in this regard.	Noted. No changes to the SA Scoping Report needed.
CSPR031	<p>We are pleased to see and have undertaken initial discussions with Bradford Council regarding the scope of the SFRA update. Following these discussions we are able to offer technical advice regarding the development of the SFRA outside of the statutory consultation process and are happy to continue discussions to agree what service we can offer and when this is needed to develop the SFRA.</p> <p>We also support that core strategy policy EN7 – Flood Risk may also need to be updated subject to the SFRA review.</p>	Noted. No changes to the SA Scoping Report needed.
CSPR045	<p>Natural England broadly welcomes the report and has the following comments to make.</p> <p>We recommend that that protected species and ancient woodland should be considered in the indicators under objective 5 To conserve and enhance the internationally, nationally and locally valued wildlife species and habitats.</p> <p>We welcome the identified plans and programmes in Appendix A but suggest that you also consider the following:</p> <ul style="list-style-type: none"> South Pennine Moors Site Improvement Plan. Available online at: http://publications.naturalengland.org.uk/publication/5412834661892096 The Nidderdale AONB Management Plan. Available online at: https://nidderdaleaonb.org.uk/ Natural Environment and Rural Communities Act 2006. 	<p>Protected species and Ancient woodland have been included as indicators under the SA Objective on biodiversity.</p> <p>Appendix A PPP Review has been amended to include the following:</p> <ul style="list-style-type: none"> South Pennine Moors Site Improvement Plan The Nidderdale AONB Management Plan Natural Environment and Rural Communities Act 2006 Defra Rights of Way Circular 01/09 Bradford Rights of Way Improvement Plan Bradford Biodiversity Action Plan National biodiversity climate change vulnerability model

Appendix C – SA Scoping Consultation Responses and Subsequent Amendments to the SA

Ref.	Comments received during consultation (non-questionnaire)	Arcadis Response and changes made to SA/SEA
	<p>Available online at: http://www.legislation.gov.uk/ukpga/2006/16/contents</p> <ul style="list-style-type: none"> • Defra Rights of Way Circular 01/09. Available online at: https://www.gov.uk/government/publications/rights-of-way-circular-1-09 • Bradford Rights of Way Improvement Plan. Available online at: https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/rights-of-way-improvements/ • Bradford Biodiversity Action Plan. Available online at: https://www.bradford.gov.uk/environment/countryside-and-rights-of-way/biodiversity/ • National biodiversity climate change vulnerability model. Available online at: http://webarchive.nationalarchives.gov.uk/20140605090108/http://naturalengland.org.uk/ourwork/climateandenergy/climatechange/vulnerability/nationalvulnerabilityassessment.aspx 	

APPENDIX D

Appraisals of Policies

APPENDIX E

Appraisal of Strategic Urban Extensions

APPENDIX F

Appraisal of Non-Strategic Sites

APPENDIX G

Influence of the Local Plan Policies

SA Objective		Local Plan Policy	Mitigating/enhancing impact
1	To ensure the prudent and efficient use of energy including the promotion of renewable and low carbon energy	SP9	<p>Seeks to ensure that new development is located where it can generate renewable and low carbon energy.</p> <p>Mitigate against the impact of climate change by maximising energy efficiency.</p> <p>Utilising natural light, ventilation and solar gain through the design and layout of new developments.</p> <p>Achieving high standards of energy efficiency in new developments.</p> <p>Taking the opportunities to produce and/or access renewable energy in new developments.</p>
		SP16	<p>Collaboration with partners and stakeholders to ensure effective landscape and environmental management and enhancement in order to address climate change.</p>
		EN10	<p>Planning decisions will maximise improvements to energy conservation and efficiency, and decarbonisation of energy sources to achieve a target of net zero carbon emissions by 2038.</p> <p>All major developments must demonstrate the application of the ‘energy hierarchy’ ... using an energy assessment tool proportional to the scale of the development.</p> <p>All new residential developments should maximise opportunities for the use of on-site renewable and low carbon energy sources, where this practical and viable</p> <p>Residential development of 50 or more dwellings should strongly aim to achieve zero net-carbon emissions, with all residential developments to meet Future Homes Standard by 2025.</p> <p>Support the development of decentralised, renewable and low carbon sources of energy (electricity and heat) by identifying suitable areas and opportunities for low carbon and renewable energy developments and storage facilities. Ensuring that future development takes place in locations and at a scale that can make a positive contribution to the district’s capacity for renewable and low carbon energy and in consideration of operational and storage risks.</p>
2	To minimise waste and increase the amount of waste which is re-used, recycled and recovered	SP9	<p>Seeks to ensure that existing buildings are converted and previously developed land is reused, where feasible.</p>
		SP13	<p>Integrate strategies for waste management in Bradford and at the sub-regional and regional levels. All forms of waste will be managed in accordance with the principles of the waste management hierarchy.</p>
		HO9	<p>Requires new development to provide well designed adequate storage solutions for recycling.</p> <p>The Council will encourage the use of new and innovative waste collection systems including underground bin systems where appropriate and feasible. In particular on larger strategic sites and developments of 500 properties or more or for high density developments.</p>
		DS5	<p>Seeks to ensure that development includes appropriate design arrangements for service, waste handling, recycling and storage.</p>

Appendix G – Influence of the Local Plan Policies

SA Objective		Local Plan Policy	Mitigating/enhancing impact
		EN18	Proposals for all waste management facilities will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.
		EN19	The following sites have been allocated for potential waste management facilities, with sufficient capacity, to meet need over the plan period: <ul style="list-style-type: none"> • Site EN19.1: Ripley Road, Bowling • Site EN19.2: Aire Valley Road, Keighley • Site EN19.3: Bowling Back Lane Household Waste Collection and Recycling Site • Site EN19.4: Steel Stock and Scrapholders Site, Birkshall Lane
		EN20	The Council will safeguard existing waste management facilities and Allocated Waste Management Sites identified in Appendix 5 and Policy EN19 respectively. The Council will resist the loss of existing facilities and allocated sites through redevelopment or change of use for any other purposes other than waste management.
		EN21	The use of recycled and secondary materials for construction of the development, including the minimisation of waste resulting from construction.
3	To make efficient use of existing land and buildings	SP4	Allocate sites by giving first priority to the efficient and effective re-use of deliverable and developable previously developed land and buildings provided that it is not of high environmental value Allocate sites by giving first priority to the more efficient and effective use of existing developed areas within the City of Bradford, the Principal Towns of Ilkley, Keighley and Bingley, the Local Growth Centres and Local Service Centres.
		SP8	Maximising the use of suitable brownfield land and regeneration sites will form a key part of the housing growth strategy Support and prioritise wherever possible the delivery of brownfield sites At least 50% of total new housing development over the plan period will be from previously developed land and buildings
		SP9	Require new development to use resources sustainably and reduce their environmental impact, particularly by making the most effective use of land, through the conversion of existing buildings and the re-use of previously developed land.
		HO2	Developers will be expected to make the best and most efficient use of land. On density of housing schemes likely to contribute towards more efficient use of greenfield land. However, impact of greenfield land that has been lost cannot be mitigated.
		TR5	There is a requirement for new developments to ensure that parking is designed to support the efficient use of land.
4	To reduce and	SP8	Minimising adverse environmental impacts of housing growth, in particular with regard to climate change, biodiversity and flood risk.

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SA Objective	Local Plan Policy	Mitigating/enhancing impact
manage the impacts of climate change on the District and vulnerability to its effects		Applying a flood risk sequential approach to direct development to areas of lowest flood risk.
	SP9	<p>Development proposals will be supported where they can demonstrate that, dependent on their scale, use and location, they have incorporated relevant mitigation and adaptation measures into their schemes to address the impacts of climate change.</p> <p>Reducing emissions and improving access to sustainable travel options including walking, cycling and public transport.</p> <p>Locating development in areas of low flood risk</p> <p>Reducing flood risk through the introduction of sustainable drainage systems (SuDS), water efficiency measures, and natural flood risk management schemes</p>
	SP10	Support the development of Green Infrastructure to help achieve a greater resilience to climate change.
	SP15	Contribute to creating healthy places – avoiding factors that negatively affect climate change while contributing to prevention measures that mitigate against the effects of climate change. Practical issues include development of Healthy Streets.
	HO9	Encourage and support new residential developments to achieve high sustainable design and construction methods which exceed minimum standards where possible
	EN1	Increased vegetation will help capture carbon, reducing the volume in the atmosphere.
	EN2	Increased vegetation will help capture carbon, reducing the volume in the atmosphere.
	EN3	New trees and woodland should be planted on all new developments in both public and private areas. They should be matched to site and climatic conditions (with a preference towards native and productive species), with a view to protecting and enhancing biodiversity and supporting the District's role in tackling the climate emergency and building resilient communities.
	EN7	<p>On flood risk would ensure that development proposals address all sources of flood risk; do not increase flood risk elsewhere; and take account of the need for improved drainage infrastructure.</p> <p>Direct development to areas with the lowest risk of flooding.</p> <p>Where development is proposed in areas of higher flood risk (Flood Zones 2 and 3a) and it meets the sequential and exception tests, it should include flood mitigation measures such as the compensatory storage of flood water, which should be identified and considered through a site specific flood risk assessment.</p> <p>The Council will not permit development in areas which are within the functional floodplain (Flood Zone 3b) as defined in the most up-to-date SFRA with the exception of water compatible uses and essential infrastructure.</p> <p>Seeks to minimise surface water run-off from new development.</p> <p>Requires major developments, and where appropriate all other developments, to incorporate SuDS in a manner that is integral to site design.</p> <p>Identify opportunities and support proposals for natural flood management.</p> <p>Requires applications to be supported by a site-specific flood risk assessment in line with the requirements of the NPPF. The assessment should address the</p>

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SA Objective		Local Plan Policy	Mitigating/enhancing impact
			risks from all sources of flooding; including fluvial, surface and ground water flooding and should make allowances for the potential impacts of climate change.
5	To safeguard and improve water resources	SP9	Seeks to ensure that development proposals minimise water consumption and maximise the use of water recycling and sustainable urban drainage systems (SuDS).
		EN1	Enhanced vegetation will help to enhance soil structure, preventing erosion.
		EN2	Protecting biodiversity features associated with water.
		EN7	Seeks to ensure that surface run-off from development is minimised, thus reducing the risk of pollution/contamination of nearby waterbodies. Require major developments, and where appropriate all other developments, to incorporate SuDS in a manner that is integral to site design, achieves high water quality standards and maximises habitat value, unless it can be demonstrated that this is not technically feasible. Identify opportunities and support proposals for natural flood management, including the restoration of culverted watercourses to open channels
		EN9	Commits the Council to working with developers and partner organisations to safeguard ground and surface water resources, ensure that no deterioration of watercourses and waterbodies occurs, ensure that development does not jeopardise any water body from achieving its Water Framework Directive objective of 'good' status, and to protect and improve water quality. Proposals for development will only be acceptable where there is no adverse impact on waterbodies and groundwater resources, in terms of their quantity, quality and the important ecological features they support. Proposals for development will be supported where they: <ul style="list-style-type: none"> • make positive progress towards achieving 'good' ecological status or ecological potential 'good status or potential' under the Water Framework Directive for surface and groundwater bodies • enhance the natural geomorphology of watercourses • manage water demand and improve water efficiency through the use of appropriate measures including rainwater harvesting and grey-water recycling include measures which help to reduce the potential for, or mitigate against water shortages or drought
6	To conserve and enhance geodiversity and biodiversity, including the internationally, nationally and locally valued wildlife species	SP10	The District's Strategic Green and Blue Infrastructure (GI) network and assets will be protected, maintained, and where appropriate, enhanced. Development proposals should make a positive contribution to the provision of Green Infrastructure and support its multi-functionality. Design and integrate new and/or enhanced green infrastructure into the scheme from the outset. Identify opportunities to link areas of green space together in order to fill gaps within the existing Green Infrastructure network Provide new connections and enhancements to the existing Green Infrastructure network and where the development falls within or adjacent to the network, ensure that the network is not severed by putting in place sufficient mitigation measures to maintain its functionality and connectivity.
		SP11	Seeks to protect the South Pennine Moors SPA/SAC and their zone of influence.

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SA Objective	Local Plan Policy	Mitigating/enhancing impact
and habitats.	EN1	Enhanced green infrastructure will support local biodiversity assets, enhancing habitats for local species.
	EN2	<p>Would seek to ensure that adverse effects on biodiversity designations are avoided, mitigated or compensated on a case by case basis. Significant effects on a designation caused by the development of a site alone are therefore unlikely to arise. Unclear regarding how effective this would be in preventing cumulative effects.</p> <p>States that development should consolidate wildlife habitat networks by seeking opportunities to create new habitats which strengthen the Network and promote resilience.</p> <p>Development that causes serious fragmentation of the Wildlife Habitat Network would be resisted.</p> <p>Policy could thus help to mitigate impact of new development on local habitat connectivity.</p> <p>Development will not be permitted where they will have a significant adverse impact on a Local Wildlife Site (LWS) or Local Geological Site (LGS) - exceptions will only be made where the reasons for, and benefits of, the proposed development clearly outweigh the adverse impact on the loss or deterioration of the designated site.</p> <p>Requires sites that could affect European Sites to be considered in HRA at the project application stage – likely significant effects (LSEs) won't be permitted</p> <p>Seeks to ensure that new development delivers measurable net gain in biodiversity value. Assessments can therefore assume a biodiversity net gain would arise where negative impacts haven't been identified.</p>
	EN3	<p>Well targeted, native tree planting and woodland creation will be encouraged, with a view to enhancing biodiversity.</p> <p>There will be a presumption in favour of the retention and enhancement of trees, woodland and hedgerow cover; particularly those which contribute towards:</p> <ol style="list-style-type: none"> 1. the character of a settlement or its setting, or the amenity of the built-up area; 2. an area's sense of place or local distinctiveness; 3. valued landscapes; 4. biodiversity and wildlife habitats. <p>Development proposals which result in the loss or deterioration of irreplaceable habitats (such as Ancient Woodland, Ancient Semi-Natural Woodland, Plantations on Ancient Woodland Sites, Ancient wood pasture, historic parkland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons. In such cases, Government Standing Advice for irreplaceable habitats should be adhered to including the use of appropriate buffer zones and any appropriate suitable compensation strategy.</p>
	EN7	<p>Manage and reduce the impacts of flooding within the beck corridors, in a manner that enhances their value for wildlife and helps to increase biodiversity. This may include the use of natural flood management processes.</p> <p>Require major developments, and where appropriate all other developments, to incorporate SuDS in a manner that is integral to site design, achieves high water quality standards and maximises habitat value, unless it can be demonstrated that this is not technically feasible.</p>
	EN9	Supports water environment and have benefits to water ecosystems.

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SA Objective		Local Plan Policy	Mitigating/enhancing impact
7	To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes.	SP2	Ensure that developments are of high quality and well designed and that they contribute to inclusive built and natural environments which protect and enhance local settings, and heritage and reinforce or create a sense of local character, community and distinctiveness, supported by high quality infrastructure
		EN1	Enhanced green infrastructure can help reduce the impact of development on the surrounding landscape, through the implementation of lines of trees.
		EN3	Would help to ensure that adverse impacts on setting and character are avoided or mitigated Would help to protect and enhance important GI elements including trees and woodland, particularly where the contribute towards the character of a settlement or its setting, an area's sense of place or local distinctiveness and/or valued landscapes. The policy adopts a presumption in the favour of the retention and enhancement of trees, woodland and hedgerow cover.
		EN5	Seeks to ensure that proposals for development and other projects, that could have an impact on the landscapes within the district, particularly, but not exclusively, those on the edge of settlements, contribute towards the management and enhancement of the Districts' landscapes and biodiversity and heritage resources. Would help to ensure that adverse impacts on setting, character and visual amenity are avoided or mitigated
		EN6	Ensures development in the countryside is in-keeping with the local area.
		DS2	Seeks to ensure that proposals take opportunities to incorporate existing features as well as providing new areas of landscape which are attractive, have a clear function, are appropriate to their context and are able to be easily managed and maintained, supported by high quality infrastructure
		DS3	Would help to ensure that new development contribute towards the local sense of place in urban areas, including through appropriate layouts, scale, density, details and materials.
8	To conserve and, where appropriate, enhance the significance of heritage assets and their setting	SP2	Protect and enhance the District's environmental resources including the character and qualities of the District's heritage. Ensure that developments are of high quality and well designed and that they contribute to inclusive built and natural environments which protect and enhance local settings, and heritage and reinforce or create a sense of local character, community and distinctiveness
		SP10	Together with sub-area policies would seek to ensure that GI is protected and enhanced, particularly that which contributes towards the setting of heritage assets
		EN3	Would help to ensure that adverse impacts on setting and character are avoided or mitigated Would help to protect and enhance important GI elements including trees and woodland, particularly where the contribute towards local distinctiveness and/or valued landscapes – character preservation
		EN4	Seeks to proactively preserve, protect and enhance the character, appearance, archaeological and historic value and significance of the District's designated and undesignated heritage assets and their settings. Also sets out mechanisms for doing so.

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SA Objective		Local Plan Policy	Mitigating/enhancing impact
		EN5	Would help to ensure that adverse impacts on historic elements in the landscape and the setting of settlements and heritage assets are avoided or mitigated
		EN6	Ensures development in the countryside is in-keeping with the local area.
		DS3	Seeks to ensure that new developments are appropriate to their context and create or reinforce a distinctive character with attractive streetscapes and buildings which offer variety and interest. Retain and integrate existing built features which could contribute to creating a distinctive identity. Ensure that tall buildings are appropriate to their location, are of high quality design and that they do not detract from key views or heritage assets or create unacceptable local environmental conditions.
9	To safeguard and improve air quality	SP7	Demand reduction: Reduce the need to travel by private car, for example by, locating development within locations with the greatest level of existing or planned accessibility by sustainable transport modes, incorporating a mix of uses to ensure high levels of accessibility to a number of services, maximising the efficient use of land by building to highest possible densities, especially near public transport hubs and sustainable transport corridors. Mode shift/structural change: Support a structural change/mode shift to sustainable travel modes. Access-controlled areas (CAZ, LEZ, etc.): Maximise the sharing of space to support safe patterns of movement by all modes of transport. Technological/electric: In an effort to reduce transport-related greenhouse gas emissions and improve air quality, the Council will support the delivery of infrastructure for more sustainable vehicle technologies
		SP9	Reduce emissions and improve air quality by working with partners to make walking, cycling and the use of public transport a first choice for all, as well as ensuring that road transport emissions reductions are integrated into decision making. Requiring new development to be located and/or positioned in sustainable well-connected locations close to local amenities and services, thereby reducing the need to travel and minimising emissions, as well as limiting its occupants' exposure to poor air quality.
		SP15	Contribute to a healthy, sustainable and well-connected District by seeking environmental improvements that minimise exposure to pollutants and improving air quality, (refer to Policy EN9: Environmental Protection)
		TR2	Seeks to ensure transport schemes are for the betterment of air quality.
		TR6	Support measures to reduce the adverse impact of freight movements on air quality including addressing specific freight emissions hotspots through the transfer of freight from road to rail, encouraging and facilitating the use of low emission vehicles and the introduction of Low Emission Zones, where found to be appropriate.
		EN8	Major planning application proposals should: <ul style="list-style-type: none"> Minimise increased exposure to existing poor air quality Minimise the level of air pollution resulting from the demolition, construction and operation of the development

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SA Objective		Local Plan Policy	Mitigating/enhancing impact
			<p>Where biomass boilers and other solid fuel heating appliances are included within the scheme, permission should only be granted if no adverse air quality impacts of these heating systems are identified.</p> <p>All major planning application proposals within the CAZ will be expected to submit an Air Quality Assessment, demonstrating that the proposal will (not the exhaustive list):</p> <ul style="list-style-type: none"> • Result in no increase in air pollution from the operation of the proposed development and, therefore, be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality • Employ the use of sustainable design and construction methods to minimise air pollutants from the demolition and construction of buildings • Result in no increased exposure to existing poor air quality and make provision to address local problems of air quality • Mitigation measures to reduce emissions resulting from the development are made on-site <p>The heating of buildings or any associated part of the development will not use biomass boilers or solid fuel appliances</p>
		EN9	Mitigation measures can be implemented to minimise the pollution and risk to a level that provides a high standard of protection for health, environmental quality and amenity.
		DS4	Would ensure that new development facilitates and encourages high rates of walking and cycling and use of public transport.
		HO9	Requires new development to provide well designed secure cycle storage
10	To develop and maintain an integrated and efficient transport network which maximises access whilst minimizing detrimental impacts and reduces congestion, pollution and carbon emissions by increasing transport choice and reducing	SP7	<p>All future development growth within the District will be planned in way that will improve accessibility to jobs and services by sustainable transport.</p> <p>Four key principles of sustainable transport which will inform decisions on major planning applications: demand reduction, modal shift/structural change, access-controlled areas and technological/electric.</p> <p>The Council supports modal shift to sustainable travel modes.</p> <p>Support the shift in road space from cars to walking, cycling and public transport through the creation of sustainable transport corridors.</p> <p>Locate development within locations with the greatest level of existing or planned accessibility by sustainable transport modes and maximise the use of such through travel plans, which provide viable alternatives to private car travel and support car-light development in sustainable locations.</p> <p>Incorporate the highest possible quality of telecoms infrastructure to allow for working from home arrangements.</p> <p>Maximise the opportunities to co-locate residential and employment development.</p>
		SP9	Seeks to mitigate and adapt to the likely effects of climate change and supports the Council's net zero carbon emissions target by ensuring new development is located in sustainable locations close to local amenities and services thereby helping to reduce travel related emissions; ensuring new development is located in areas where there are opportunities to access sustainable transport modes and supporting the provision of refuelling infrastructure for zero-emissions vehicles.
		DS4	Seeks to ensure that new developments get the movement framework right by creating a network of routes which connect to where people want to go, and which offer choice and a pleasant experience.

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SA Objective		Local Plan Policy	Mitigating/enhancing impact
	the need to travel by lorry/ private car	HO9	Requires new development to provide well designed secure cycle storage
		TR1	Enhancing existing transport infrastructure that has the potential to support regeneration or the use of sustainable transport options.
		TR2	Transport schemes will protect the natural and built environment, following good design principles and reducing the dangers of transport.
		TR3	<p>Development should support and contribute to appropriate levels of enhancement to all transport networks, in order of priority:</p> <ul style="list-style-type: none"> • cycling and walking, • public transport, and • highways infrastructure and services. <p>Requires all new major developments to encourage walking and cycling by taking the opportunities to connect to the existing street and path network and cycle routes, to local facilities and public transport.</p> <p>Require all new major developments to encourage the use of public transport</p>
		TR4	Support sustainable access to tourist destinations, heritage and cultural assets and leisure uses.
		TR5	Sufficient parking will be implemented to support development, but where possible, 'car-free' development will be encouraged.
		TR6	Seeks to encourage the development of an integrated freight distribution system....that makes the most efficient and effective use of all modes of transport subject to environmental considerations including the need to protect and enhance residential areas and locally, regionally, nationally and internationally important biodiversity sites.
11	To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources	SP8	<p>The Local Plan will seek to deliver a housing requirement of 30,672 new homes over the plan period 2020-2038, equating to an indicative average of 1,704 new dwellings per annum.</p> <p>Sets out components of supply, i.e. how housing will be delivered</p> <p>The housing growth strategy will be aligned to the available land supply, the Council's priority regeneration areas and the settlement hierarchy.</p> <p>A key part of the housing growth strategy is maximising the use of suitable brownfield land and regeneration sites</p>
		HO1	Seeks to result in the delivery of new homes.
		HO2	Ensure appropriate housing density is delivered to provide enough housing to meet the local needs.

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SA Objective	Local Plan Policy	Mitigating/enhancing impact
	HO3	Ensure that urban housing schemes are high quality appropriate to their context in terms of urban grain, height and massing, roofscape, materials and appearance and typically achieve higher densities above 50 dwellings per hectare.
	HO4	<p>Seek to ensure that a mix and balance of housing is provided to meet the needs of the District's growing and diverse population.</p> <p>All major residential developments of 10 or more homes will be expected to incorporate a mix of housing types, sizes, prices and tenures.</p> <p>Strategic housing priorities – family housing, affordable housing, larger homes, accessible and adaptable housing, high quality townhouses, duplexes and flats, and specialist housing and accommodation for older people, people with disabilities and cultural need of non-travelling Travellers</p>
	HO5	<p>Work with partners to ensure that there is a sufficient supply of good quality affordable housing that meets identified needs across the District, particularly in the areas of highest need.</p> <p>Affordable housing contributions will be required on all major developments of 10 or more homes</p> <p>Affordable housing should be provided at the target levels specified below:</p> <ul style="list-style-type: none"> • 35% (Brownfield target), 40% (Greenfield target) in Wharfedale • 20% (Brownfield target), 25% (Greenfield target) in towns, suburbs and villages • 10% (Brownfield and Greenfield target) in inner Bradford and Keighley • 10% (Brownfield target), 15% (Greenfield target) Outer Bradford and Keighley <p>The following affordable housing tenure mix will be the starting point for all affordable housing negotiations:</p> <ul style="list-style-type: none"> • 65% affordable housing for rent • 35% affordable home ownership products <p>In line with national policy, at least of the 10% of overall affordable housing contribution from a site should be to be available for affordable home ownership, unless this would significantly prejudice the ability to meet identified local affordable housing needs.</p>
	HO6	The Council will seek to secure an appropriate mix of homes on all sites allocated for housing development in the Plan, taking account of existing imbalances in housing stock, site characteristics, viability and market considerations and opportunity to facilitate Custom Self Build (SBCH) housing schemes.
	HO7	The Council and its partners will work together to support the delivery of specialist housing including for older people, vulnerable people and people with disabilities across the District.
	HO8	<p>In order to meet the accommodation needs of Gypsies and Travellers, the Council will make provision via policies and site allocations to deliver at least the following number of additional pitches for the period to 2038:</p> <ul style="list-style-type: none"> • 26 pitches for the gypsy and traveller communities • Identifying specific sites for a minimum 15 pitches to meet year 5-year Authorised Pitch Shortfall
	HO9	New housing development should be high quality and achieve good design. Residential development assessed to be of poor design will be refused permission. Policies DS1 to DS5 together with the Homes and Neighbourhoods Housing Design Guide SPD provides guidance on the process for achieving good design and

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SA Objective	Local Plan Policy	Mitigating/enhancing impact
		<p>how the quality of residential development proposals will be assessed.</p> <p>The Council will encourage and support new housing developments to achieve high sustainable design and construction standards which exceed minimum standards where possible.</p> <p>The provision of suitable housing and genuine choice for the District's diverse population.</p> <p>New build residential developments should include the following proportions of accessible homes:</p> <ul style="list-style-type: none"> • All new build dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. • On major development sites over 0.5 hectare or 10 or more homes, a minimum of 5% of dwellings should meet the Building Regulations requirement M4(3) 'wheelchair user dwellings', designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. <p>The mix of sizes, types and tenures of accessible housing should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional accessible housing in a particular tenure).</p> <p>All new market and affordable homes should, as a minimum, meet the Nationally Described Space Standard (NDSS) for internal space in new dwellings.</p>
	HO10	<p>The Council will work with stakeholders and use its plans, programmes and strategies to make best use of and improve the quality of the existing housing stock. In particular, the Council will seek to address the problems of overcrowding and the number and proportion of empty homes.</p>
12	SP2	<p>Enhance the role of Bradford District within the wider Leeds City Region as a key business location with a good supply of labour, housing, services including retail and associated community provision.</p>
	SP3	<p>The settlement hierarchy seeks to promote sustainable patterns of development which support, enhance and take advantage of the services and infrastructure within towns and villages. It also has the effect of avoiding unnecessary dispersal of development which would if it occurred undermine the efficient delivery of services.</p>
	SP8	<p>The right infrastructure will be delivered at the right time to support housing growth and sustainable communities, including the provision of digital technology infrastructure and investments in transport, health and education.</p>
	SP9	<p>Ensuring new development is located in sustainable locations close to local amenities and services thereby helping to reduce travel related emissions</p>
	SP10	<p>Aims to support active travel routes including public rights of way: footpaths, bridleways, cycle paths and greenways, to improve community access to services.</p>
	SP15	<p>Supports the delivery of community services and allows people to access and produce healthy food and create a positive food environment where they live</p>
	HO8	<p>In order to meet the accommodation needs of Gypsies and Travellers, the Council will make provision via policies and site allocations to deliver at least the following number of additional pitches for the period to 2038:</p> <ul style="list-style-type: none"> • 26 pitches for the gypsy and traveller communities • Identifying specific sites for a minimum 15 pitches to meet year 5-year Authorised Pitch Shortfall

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SA Objective		Local Plan Policy	Mitigating/enhancing impact
		DS4	Seeks to improve access through streets to improve access to essential and have benefits to community cohesion.
		CO2	Seeks to provide community and health facilities.
13	To promote social cohesion, encourage participation and improve the quality of life in deprived neighbourhoods	SP2	Transform economic, environmental, physical and social conditions of the District, in particular the Regional City of Bradford including Bradford City Centre, Shipley and Canal Road Corridor, key regeneration areas, including Manningham and Holme Wood, and Leeds Bradford Corridor as well as Keighley Airedale, and Shipley.
		SP6	Maximise economic opportunities within identified employment zones, business enterprise zones and designated enterprise zones.
		SP9	Development proposals will be supported where they can demonstrate that, dependent on their scale, use and location, they have incorporated relevant mitigation and adaptation measures into their schemes to address the impacts of climate change. Green Infrastructure is to be incorporated into development proposals from the outset.
		SP10	Enhancing the provision of green infrastructure across the District could help community cohesion by providing outdoor space for communities to meet and engage.
		SP15	Will seek to create healthy places by maximising health and wellbeing gains from development proposals and ensuring that negative impacts are designed out or mitigated. Development that provides opportunities for healthy lifestyles, contributes to creating healthier communities and helps to reduce health inequalities will be supported.
		HO8	In order to meet the accommodation needs of Gypsies and Travellers, the Council will make provision via policies and site allocations to deliver at least the following number of additional pitches for the period to 2038: <ul style="list-style-type: none"> • 26 pitches for the gypsy and traveller communities • Identifying specific sites for a minimum 15 pitches to meet year 5-year Authorised Pitch Shortfall
		DS4	Seeks to improve access through streets to improve access to essential and have benefits to community cohesion.
		CO2	Seeks to provide community and health facilities.
		14	To create good cultural, leisure and recreation activities available to all.
SP10	Seeks to protect, maintain and, where appropriate, enhance the GI network, which would in turn be likely to help protect important recreational and cultural green spaces. It would also help to ensure that new development links areas of green space together and provides new connections and enhancements to the existing GI network.		

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SA Objective		Local Plan Policy	Mitigating/enhancing impact
			Development proposals should ensure that where opportunities exist, the scheme connects to the existing walking and cycling networks and greenways.
		SP15	<p>Prioritises pedestrians and active travel by designing places that promote walking and cycling.</p> <p>Supports active-design principles to shape our built environment to maximise opportunities for physical activity.</p> <p>Supports the provision, protection and improvement of multifunctional green infrastructure, therapeutic environments, open space and leisure and recreation facilities</p> <p>Enables an appropriate and varied mix of play for children of different ages and allows for intergenerational play</p>
		CO1	Would help to ensure that open spaces (which includes, allotments, amenity greenspaces, cemeteries, civic spaces, green and blue corridors, natural and semi-natural greenspaces, outdoor sports facilities, parks and gardens, provision for children, and areas of water which offer opportunities for sport and recreation) are protected, thereby preserving residents' access to these important cultural and leisure spaces.
		EC4	<p>Bradford City Centre should be the focus for a wide diversity of economic activity, including significant offices, residential, convenience and comparison retail including the traditional (and specialist) markets, leisure, entertainment, arts, culture, tourism, intensive sports and recreation uses and the priority centre for promotional events and activities</p> <p>Keighley, Ilkley, Bingley and Shipley Town Centres should be the focus for office, residential, convenience and comparison retail, including the traditional (and specialist) markets, leisure, entertainment, arts, culture and tourism, intensive sports and recreation uses that are appropriate to the centres.</p>
		TR4	Support sustainable access to tourist destinations, heritage and cultural assets and leisure uses.
		EN6	Supports appropriate development in the countryside to ensure rural residents have access to services.
		DS2	Development proposals should take advantage of existing features, integrate development into the wider landscape and create new quality green spaces and landscape features.
		DS3	Development proposals should create a strong sense of place and be locally distinctive, reflecting the District's varied character. Designs should be appropriate to their context in terms of layout, scale, density, details and materials.
		DS4	Seeks to improve access through streets to improve access to essential and have benefits to community cohesion.
		15	To improve safety and security for people and property.
SP3	The location of development, support a diverse economy, improving accessibility and enhancing open spaces, would help ensure neighbourhoods are perceived as safe and reduce the fear of crime.		
SP4	The location of development, improving accessibility and incorporating green corridors, would help ensure neighbourhoods are perceived as safe and reduce the		

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SA Objective	Local Plan Policy	Mitigating/enhancing impact
		fear of crime.
	SP16	Improving the local community, would help improve community cohesion and improve safety.
	HO9	New housing development should be high quality and achieve good design. Residential development assessed to be of poor design will be refused permission. Policies DS1 to DS5 together with the Homes and Neighbourhoods Housing Design Guide SPD provides guidance on the process for achieving good design and how the quality of residential development proposals will be assessed.
	DS5	Seeks to ensure that new developments are designed to ensure a safe and secure environment and reduce the opportunities for crime, that buildings and places are inclusive and accessible to all, and that social interaction is encouraged.
	CO2	Seeks to provide community and health facilities.
16	To provide the conditions and services to improve physical and mental health and wellbeing and reduce inequality to access to health and social care.	<p data-bbox="595 638 2029 722">SP2 Ensure that the local plan and well-designed, high quality development contributes to the creation and delivery of healthy places, improving people’s health and wellbeing and helping reduce health inequalities, by planning sustainable, resilient and well-connected places where people want to live and work.</p> <p data-bbox="595 722 2029 834">SP9 Supports walking and cycling as alternatives to car use, which would promote physical exercise. Reduction on personal car use would also improve air quality, having benefits for health.</p> <p data-bbox="595 834 2029 896">SP10 The provision of green infrastructure has major benefits to mental wellbeing, and can improve physical health, by providing attractive outdoor spaces for exercise.</p> <p data-bbox="595 896 2029 1185">SP15 Will seek to create healthy places by maximising health and wellbeing gains from development proposals and ensuring that negative impacts are designed out or mitigated. Development that provides opportunities for healthy lifestyles, contributes to creating healthier communities and helps to reduce health inequalities will be supported. Will direct new development towards well connected locations to enable active travel Supports the Healthy Streets principle of promoting well designed and safe places. Supports active-design principles to shape our built environment to maximise opportunities for physical activity Seeking environmental improvements that minimise exposure to pollutants and improving air quality</p> <p data-bbox="595 1185 2029 1297">HO9 New housing development should be high quality and achieve good design. Residential development assessed to be of poor design will be refused permission. Policies DS1 to DS5 together with the Homes and Neighbourhoods Housing Design Guide SPD provides guidance on the process for achieving good design and how the quality of residential development proposals will be assessed.</p> <p data-bbox="595 1297 2029 1359">EN1 Enhanced green infrastructure can improve physical and mental wellbeing.</p> <p data-bbox="595 1359 2029 1420">EN8 Improving air quality will have benefits to human health, helping to reduce risk of cardiovascular disease.</p>

Appendix G – Influence of the Local Plan Policies

SA Objective		Local Plan Policy	Mitigating/enhancing impact
		EN9	Seeks to ensure development proposals do not result in pollution which could be detrimental to human health.
		CO1	Land identified as open space, as defined on the Policies Map, will be protected from development. Residential developments will be required to provide for new or improved open space. Proposals for major residential development in an area where there is an identified need or deficiency of built sports and recreation facilities, as set out in the latest Playing Pitch Strategy, will be required to make a contribution to secure the provision or enhancement of such facilities. Local Green Spaces will be protected from development except in very special circumstances in line with national policy on proposals affecting the Green Belt.
		CO2	Seeks to provide community and health facilities.
		CO3	All major development proposals will be expected to positively design for creating healthy places. Where applicable a Health Impact Assessment (HIA) will be required for major developments commensurate to the scale of the development and as part of the planning application.
		DS1	Seeks to achieve good design and high quality places by getting the process right and using appropriate tools at the right stage to ensure that design puts the quality of place first. It seeks to ensure a holistic and collaborative approach, working with local communities and key stakeholders, understanding places and their context, and taking the opportunities to improve places including transforming areas which have the potential for change and supporting the regeneration aspirations of the District, through Planning decisions including development proposals and investment decisions.
		DS5	Seeks to ensure that new developments are designed to ensure a safe and secure environment and reduce the opportunities for crime, that buildings and places are inclusive and accessible to all and social interaction is encouraged.
		17	To promote education and training opportunities which build the skills and capacity of the population.
SP14	Taking opportunities to improve areas and make them as good as they can be. Ensuring that planning and design processes work together in an open, collaborative manner to help achieve the best outcomes for everyone.		
SP16	To support investment and the continued renewal and regeneration of urban and rural areas.		

Appendix G – Influence of the Local Plan Policies

SA Objective		Local Plan Policy	Mitigating/enhancing impact
		EC3	The Council will seek to secure an employment and skills plans through a s.106 obligations framework with applicants where the proposed development meets the following thresholds: strategic scale infrastructure, 500+ housing project, 10ha+ employment project. The Council will seek to secure local employment and skills plans for the construction phases of residential developments of more than 50 dwellings gross and commercial schemes of more than 1,000 square metres gross.
		DS5	Supports the development of inclusive communities.
		CO2	Seeks to provide community and health facilities.
18	To increase the number of high-quality job opportunities suited to the needs of the local workforce.	SP6	Accelerating economic growth through implementing major regeneration initiatives and proposals across the District and diversify the rural economy.
		SP14	Taking opportunities to improve areas and make them as good as they can be. Ensuring that planning and design processes work together in an open, collaborative manner to help achieve the best outcomes for everyone.
		SP16	To support investment and the continued renewal and regeneration of urban and rural areas.
		EC1	To deliver economic growth and support jobs within the District, sustainable economic growth is directed towards the employment land sites
		EC2	The development, regeneration and protection of employment areas for B-class uses within the District will be supported to meet the needs of the marketplace and provide land to support jobs and economic growth. Business Development Zones (BDZs) are designated to support the regeneration of established employment areas Employment Zones (EZs) within the District are designated to maintain and support local business growth and development
		EC3	The Council will seek to secure an employment and skills plans through a s.106 obligations framework with applicants where the proposed development meets the following thresholds: strategic scale infrastructure, 500+ housing project, 10ha+ employment project. The Council will seek to secure local employment and skills plans for the construction phases of residential developments of more than 50 dwellings gross and commercial schemes of more than 1,000 square metres gross.
		EC4	Bradford City Centre should be the focus for a wide diversity of economic activity, including significant offices, residential, convenience and comparison retail including the traditional (and specialist) markets, leisure, entertainment, arts, culture, tourism, intensive sports and recreation uses and the priority centre for promotional events and activities.
19	To support investment and enterprise that respects the needs of a local	SP6	Accelerating economic growth through implementing major regeneration initiatives and proposals across the District. Supporting and improving the vitality and viability of the City Centre and town, and district and local centres and the development of skilled and flexible communities and workforce in order to underpin future economic growth, a move towards a greener economy and to deliver the Bradford Economic Growth Strategy.

Appendix G – Influence of the Local Plan Policies

SA Objective	Local Plan Policy	Mitigating/enhancing impact
area.	SP14	Taking opportunities to improve areas and make them as good as they can be. Ensuring that planning and design processes work together in an open, collaborative manner to help achieve the best outcomes for everyone.
	SP16	To support investment and the continued renewal and regeneration of urban and rural areas.
	EC1	To deliver economic growth and support jobs within the District, sustainable economic growth is directed towards the employment land sites
	EC2	<p>The development, regeneration and protection of employment areas for B-class uses within the District will be supported to meet the needs of the marketplace and provide land to support jobs and economic growth.</p> <p>Business Development Zones (BDZs) are designated to support the regeneration of established employment areas</p> <p>Employment Zones (EZs) within the District are designated to maintain and support local business growth and development</p>
	EC3	<p>The Council will seek to secure an employment and skills plans through a s.106 obligations framework with applicants where the proposed development meets the following thresholds: strategic scale infrastructure, 500+ housing project, 10ha+ employment project.</p> <p>The Council will seek to secure local employment and skills plans for the construction phases of residential developments of more than 50 dwellings gross and commercial schemes of more than 1,000 square metres gross.</p>
	EC4	Bradford City Centre should be the focus for a wide diversity of economic activity, including significant offices, residential, convenience and comparison retail including the traditional (and specialist) markets, leisure, entertainment, arts, culture, tourism, intensive sports and recreation uses and the priority centre for promotional events and activities.

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