

Bradford Local Plan

Integrated Appraisal Report -

Non-Technical Summary

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1. Introduction

- 1.1.1. AECOM was commissioned by the City of Bradford District Council to undertake an Integrated Appraisal (IA) of the emerging Bradford District Local Plan. The purpose of the IA is to assess the likely social, economic, environmental, health and equality effects of the Plan and reasonable alternatives before it is finalised.
- 1.1.2. The IA combines three assessment processes into a single framework:
 - **Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)**, which assesses environmental, social and economic effects.
 - **Equality Impact Assessment (EqIA)**, which considers the potential effects of the Plan on groups within the community with ‘protected characteristics’.
 - **Health Impact Assessment (HIA)**, which considers effects on health and wellbeing and opportunities to reduce health inequalities.
- 1.1.3. Bringing these assessments together helps ensure that the Local Plan is considered holistically and avoids duplication across several separate studies.
- 1.1.4. The IA has been undertaken alongside the preparation of the Local Plan and has informed the development of the Plan's strategy, policies and site allocations. Its purpose is to identify potential positive and negative effects, maximise benefits where possible and recommend mitigation measures where adverse impacts may occur.
- 1.1.5. This document is a non-technical summary of the full Integrated Appraisal Report, which will be published for consultation with a range of stakeholders alongside the draft Plan at Regulation 19 stage.

2. Scoping summary

- 2.1.1. The IA Scoping Stage establishes the framework used to assess the Bradford Local Plan. The scope is informed by a review of baseline evidence, relevant plans and programmes, to identify existing/future economic, social, environmental, health and equality issues facing the District. A range of objectives are established to address these key issues and form the basis of the ‘IA framework’ that is used to assess the potential impacts of the Plan (and reasonable alternatives).
- 2.1.2. Previous drafts of the scoping report were subject to consultation with statutory consultees, and the updated scoping report will be made available to them (alongside wider stakeholders) as part of the Regulation 19 public consultation on the Plan.

- 2.1.3. The scoping process identified a number of key challenges and opportunities facing the District, as summarised below. These issues informed the IA objectives and guide questions used throughout the assessment.

Communities, Population and Housing

- Growing population increasing demand for housing, infrastructure and services.
- There is a need to meet identified housing needs, whilst improve housing affordability, choice and quality.
- Persistent deprivation and inequalities exist across parts of the District.
- There are high levels of crime in some urban areas.
- It is important to maintain digital connectivity and access to services.
- There is a need to ensure infrastructure keeps pace with growth.

Health and Inequalities

- In some areas, there are poorer health outcomes and lower life expectancy than national averages.
- Significant health inequalities exist between deprived and affluent communities.
- High levels of deprivation, child poverty and fuel poverty persist in certain communities.
- Low physical activity rates and obesity challenges exist.
- There is a need to improve access to education, jobs, services and healthy environments.

Economy

- On average, there are lower qualification levels and earnings than regional and national averages.
- There are high levels of employment and income deprivation.
- There is a need to diversify the economy and support business growth.
- There are major regeneration opportunities across Bradford, Keighley and Shipley.
- There is a need for additional employment land and inward investment.
- There are vacancy issues within some the District's centres, as well vitality and viability issues.

Natural Environment

- Importance of protecting landscape character and local distinctiveness.
- There is pressure on greenfield land to accommodate development.
- There is a need to protect and enhance biodiversity and ecological networks.
- Presence of internationally and nationally important habitats, including the South Pennine Moors within the District
- There are opportunities to deliver biodiversity net gain and support nature recovery.

Built Environment and Heritage

- Significant heritage resources across the district, including the Saltaire World Heritage Site, conservation areas, listed buildings and registered parks and gardens. There is a need to protect and enhance heritage assets and their settings.
- Opportunities for heritage-led regeneration and reuse of historic buildings.
- Importance of maintaining local character and distinctiveness.

Connectivity

- Road congestion and poor air quality exist in parts of the District.
- There is a need to improve public transport including rail connectivity, walking and cycling networks.
- Importance of reducing reliance on private vehicles.
- Dependency on funding and infrastructure delivery to achieve transport improvements.

Climate and Resources

- Poor air quality remains a key issue in parts of the District.
- There is a need to reduce carbon emissions and improve energy efficiency.
- Flood risk affects parts of the District and is expected to increase with climate change.
- Managing pressure on water resources, water quality and wastewater infrastructure.
- Potential loss of agricultural land through development.
- There is a need to minimise waste, promote recycling and safeguard mineral resources.

- Importance of climate resilience, sustainable drainage and efficient use of land and resources.

3. Summary of plan making stages

- 3.1.1. The Integrated Appraisal has been undertaken alongside preparation of the Local Plan as an ongoing and iterative process. Work commenced with a Scoping Report in 2019 as part of earlier work on a partial review of the Core Strategy, which was then reviewed and updated as the Council moved to a single new integrated plan which established the sustainability objectives, evidence base and assessment framework used throughout plan preparation process. The scoping report was updated and reviewed with statutory parties prior to the Reg 18 consultation in 2021 and informed the interim SA reporting.
- 3.1.2. An Interim Sustainability Appraisal (with separate equality and health impact assessment reports) was subsequently published alongside consultation on the Regulation 18 Draft Local Plan in 2021. This assessed a wide range of alternatives, including different approaches to housing growth, the distribution of development, strategic policies, potential Strategic Urban Extensions and site allocations across the District. The appraisal identified the potential social, economic and environmental effects of these alternatives and helped inform the development of the emerging Local Plan.
- 3.1.3. Consultation responses on both the Draft Local Plan and Interim Sustainability Appraisal highlighted a range of issues relating to environmental evidence, assessment methods, site options and strategic growth alternatives. These comments, together with updated technical evidence and changes to national policy, informed subsequent refinement of both the Local Plan and the Integrated Appraisal process.
- 3.1.4. The current Integrated Appraisal builds on this earlier work and provides a comprehensive reassessment of the Local Plan and the reasonable alternatives relevant to the Regulation 19 stage. It demonstrates how sustainability considerations have informed plan-making throughout the preparation of the Local Plan and how the assessment has evolved as new evidence and strategic choices have emerged.
- 3.1.5. Following the interim stages, a review of the IA process was undertaken and a decision made to better integrate the different impact assessment tools so that assessment and reporting could be undertaken holistically. As part of this exercise, a new scoping report has been prepared, which presents an updated IA Framework that clearly incorporates equality and health impact assessment factors.

4. Identifying strategic alternatives at Regulation 19 stage

4.1.1. By the Regulation 19 stage, the Council had a clearer understanding of:

- The level of housing need that should be planned for;
- Which sites are available and capable of being developed;
- Environmental and infrastructure constraints;
- Opportunities for regeneration and urban renewal; and
- The potential role of Grey Belt and Green Belt land in meeting development needs.
- An assessment of transport and air quality impacts of growth.

4.1.2. The focus of the assessment therefore shifted away from examining individual sites in isolation and towards testing alternative versions of the Local Plan as a whole. Each alternative represents a different approach to distributing future growth across the district while continuing to meet housing needs.

Alternatives not taken forward

4.1.3. A number of potential approaches were considered but were not taken forward for detailed assessment because they were not considered realistic or reasonable at this stage. These included:

- **Lower growth options**, which would not meet identified housing needs and would make a lesser contribution towards addressing affordability issues.
- **Very high growth options focused solely on large urban extensions**, which would still require additional development elsewhere and were not supported by sufficient evidence of deliverable land.
- **Highly dispersed growth options**, which could not realistically provide enough capacity to meet development needs.
- **New settlement proposals and very large urban extensions**, which had not been promoted through the plan-making process, were unlikely to be deliverable within the plan period and could result in significant environmental impacts.
- **Comprehensive Green Belt release options**, which would provide far more land than required and would not represent a proportionate response to identified needs.

4.1.4. After reviewing these possibilities, the Council identified eight realistic growth alternatives for detailed assessment. These are summarised below, preceded by an explanation of 'constant' elements that apply to each option.

Constant elements of supply

- 4.1.5. For each alternative, there is a total capacity of deliverable sites in the urban area of 12,001 dwellings (includes a 6% Allocations and Allowances buffer) that is consistent (or 'given') across all of the alternatives. The remainder of the constants consist of:
- Under Construction (U/C) developments forecast to build out through the plan period: **5,208 units**
 - Extant Planning Permissions (P/P) – 1,812 units minus a 10% non-implementation rate: **1,631 units**
 - Windfall net of clearances / demolitions: **3,300**
- 4.1.6. The total 'constant element' that applies to each option is therefore 22,140 dwellings.

Preferred Option (minimum 33,669 dwellings housing requirement – with support identified for 35,179)

- 4.1.7. The emerging Preferred Option represents the Council's proposed strategy for the Local Plan. It focuses most growth within Bradford and the district's main towns while also making use of 'urban extensions' and selected Grey Belt and Green Belt releases where needed. The strategy seeks to balance housing delivery, regeneration, economic growth, environmental protection and infrastructure capacity.
- 4.1.8. Included in this option was a Regeneration Area Allowance (RAA) of 6,000 dwellings. This forms an important driver of the strategy, but no specific sites are allocated in these locations.

RA1A: Urban intensification through previously developed land (30,547)

- 4.1.9. This option prioritises the redevelopment of previously developed (brownfield) land within existing urban areas. Growth would be focused on sites that already benefit from access to services, jobs and infrastructure, with little reliance on outward expansion. Included in this option was a Regeneration Area Allowance (RAA) of 6000 dwellings. This forms an important driver of the strategy, but no specific sites are allocated in these locations. However, there could still be a slight shortfall in meeting identified housing needs.

RA1B: Urban intensification through additional urban sites (35,500)

- 4.1.10. This option also focuses on development within existing settlements but includes a wider range of sites, including undeveloped urban land. It tests whether more housing could be accommodated within settlement boundaries before expanding into surrounding countryside. Included in this option was a Regeneration Area Allowance (RAA) of 5640 dwellings. This forms an important driver of the strategy, but no specific sites are allocated in these locations.

RA2A: Urban edge expansion around Bradford (37,045)

- 4.1.11. This option focuses additional growth around the edge of the Bradford urban area on greenfield sites. It reflects Bradford's role as the district's main centre for jobs, services and facilities and concentrates development around the Regional City. Included in this option was a Regeneration Area Allowance (RAA) of 6000 dwellings. This forms an important driver of the strategy, but no specific sites are allocated in these locations.

RA2B: Urban edge expansion across the District (37,045)

- 4.1.12. This option spreads urban edge growth more widely across Bradford, the district's towns and larger settlements. It tests a more dispersed pattern of development while still focusing growth next to existing communities. Included in this option was a Regeneration Area Allowance (RAA) of 6000 dwellings. This forms an important driver of the strategy, but no specific sites are allocated in these locations.

RA2C: Urban edge expansion without reliance on Regeneration Areas (37,045)

- 4.1.13. This option follows the same overall approach as RA2B but assumes less housing delivery reliance from regeneration areas. As a result, a greater proportion of growth would need to be accommodated on identified development sites around settlements. Though the Regeneration Area allowance has been factored into this option (as it is an important feature to help meet plan objectives), there is no explicit reliance on this to meet identified housing needs, and therefore a reasonable assumption is that the allowance could be lower than for the options that explicitly include a reliance on these areas to meet needs.

RA3A: Grey Belt-led strategy (37,045)

- 4.1.14. This option places greater emphasis on the use of identified Grey Belt land. Development would be focused on locations considered to make a more limited contribution to Green Belt purposes, potentially reducing pressure on other parts of the Green Belt.

RA3B: Grey Belt-Led strategy without reliance on Regeneration Areas (37,045)

- 4.1.15. This option follows the same broad approach as RA3A but assumes less housing delivery reliance from regeneration opportunities. A greater proportion of development would therefore be accommodated through the release of Grey Belt sites.

Figure 1: The emerging preferred option (variable / residual sites and regeneration areas mapped)

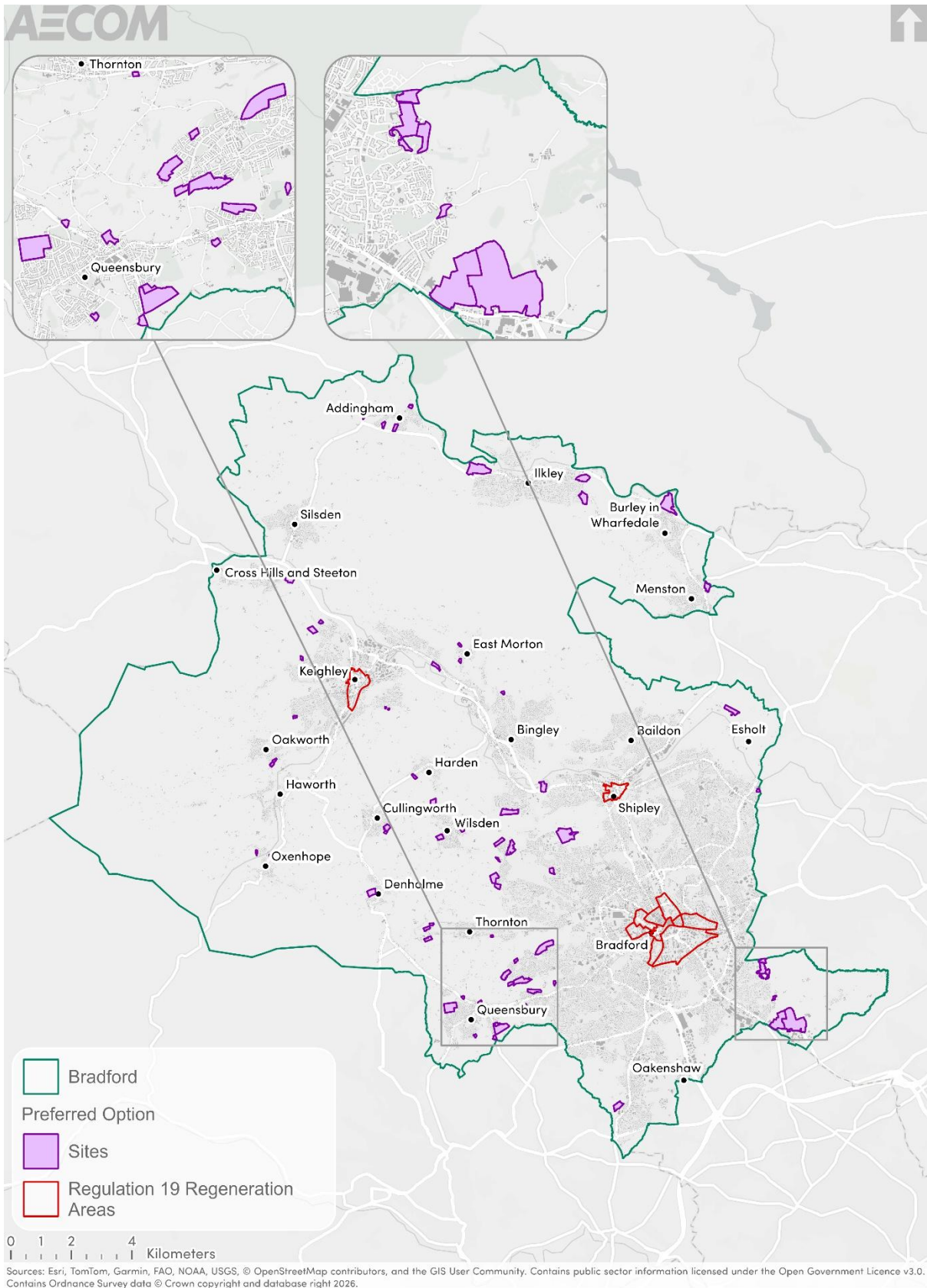
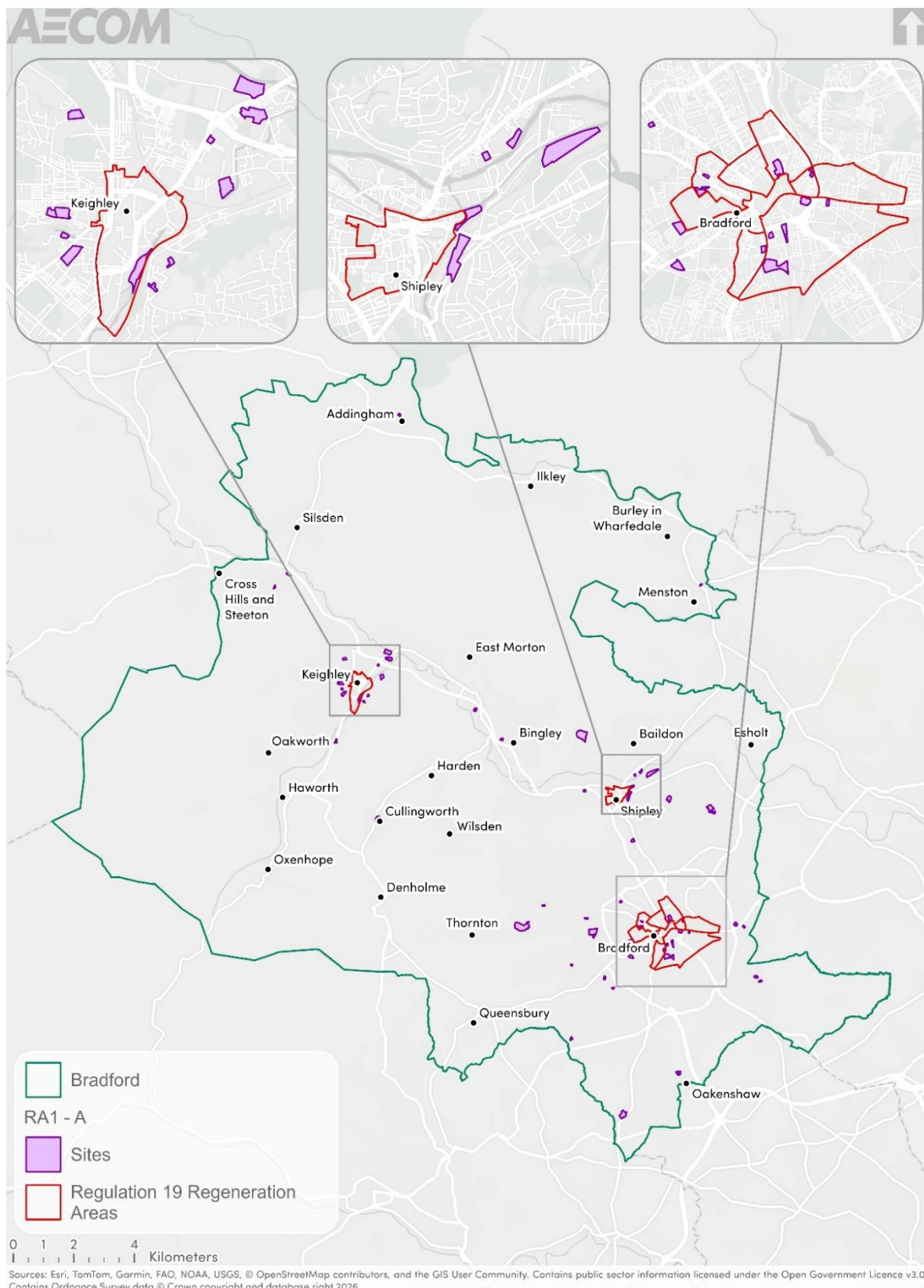
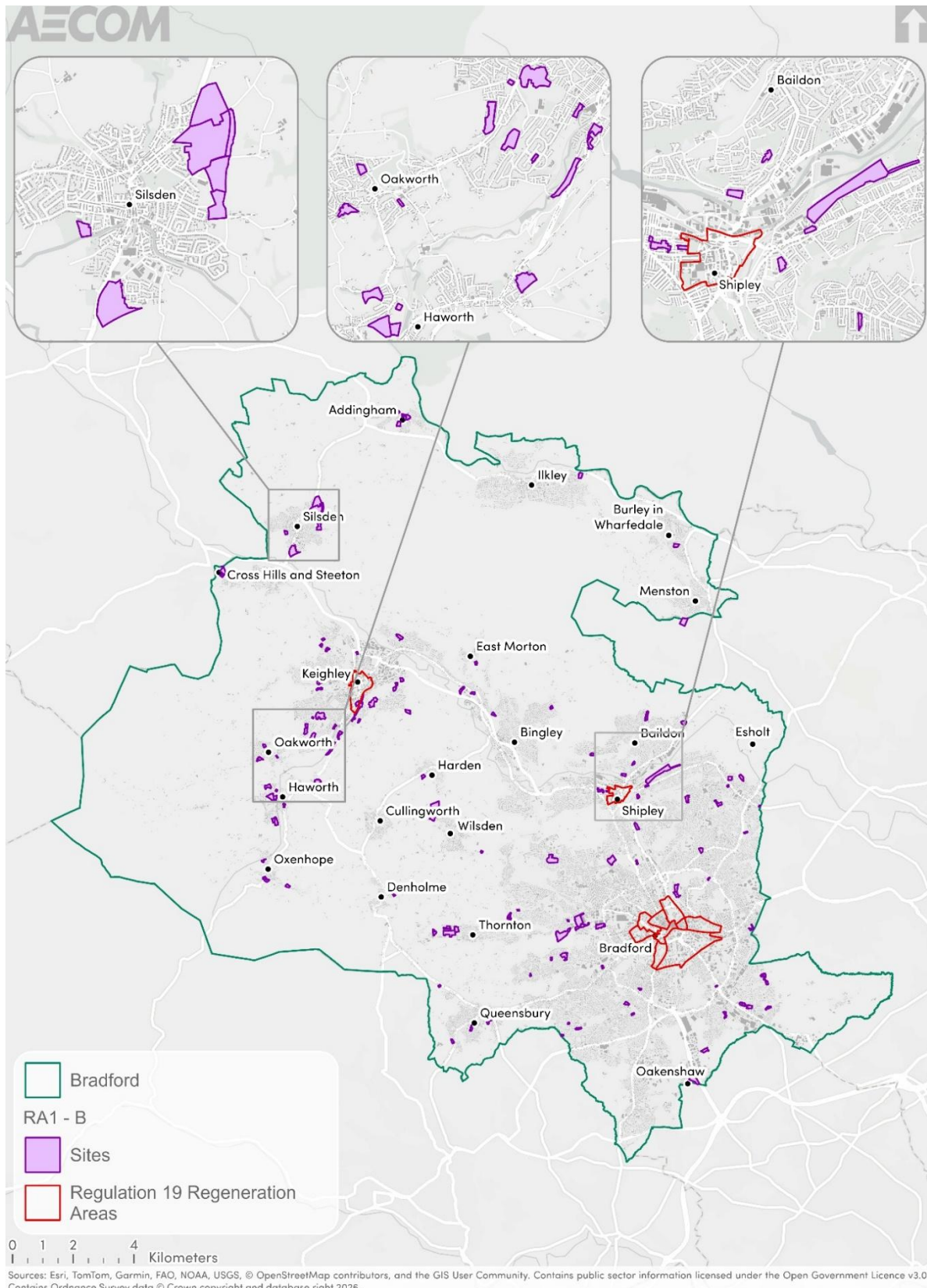


Figure 2: RA1A: Urban intensification through previously developed land (variable / residual sites and regeneration areas mapped)



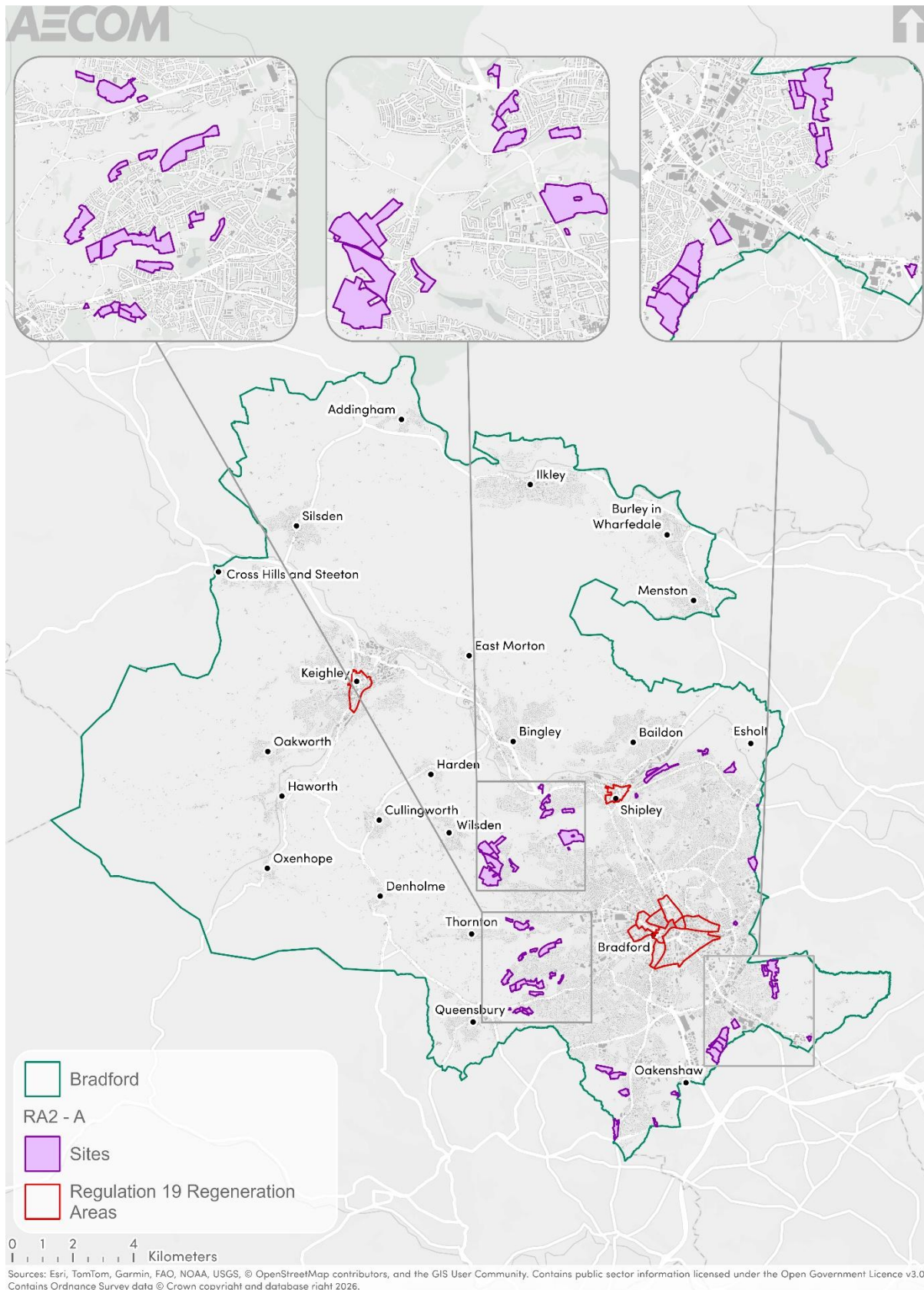
Nb: Sites may include land not included for housing in some cases and land included for other land uses in the Preferred Option.

Figure 3: RA1B: Urban intensification through additional urban sites (variable / residual sites and regeneration areas mapped)



Nb: In some cases 'urban sites' can include land within settlement boundaries and 'white land' which is not brownfield.

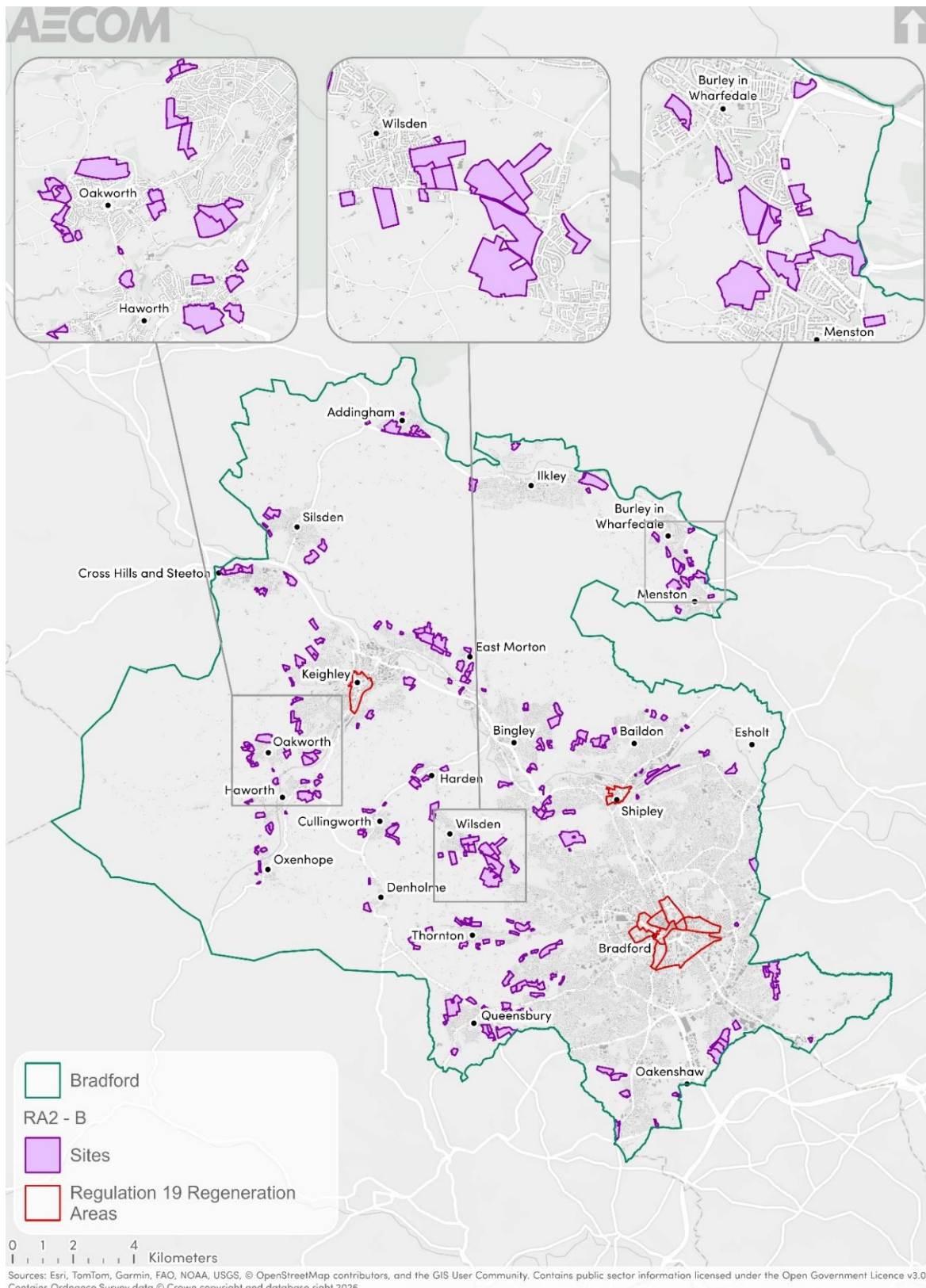
Figure 4: RA2A Urban edge expansion around Bradford (variable / residual sites and regeneration areas mapped)



Nb: May include variations to boundaries or extended versions of sites similar to preferred options plus other sites.

Figure 5: RA2B: Urban edge expansion across the District

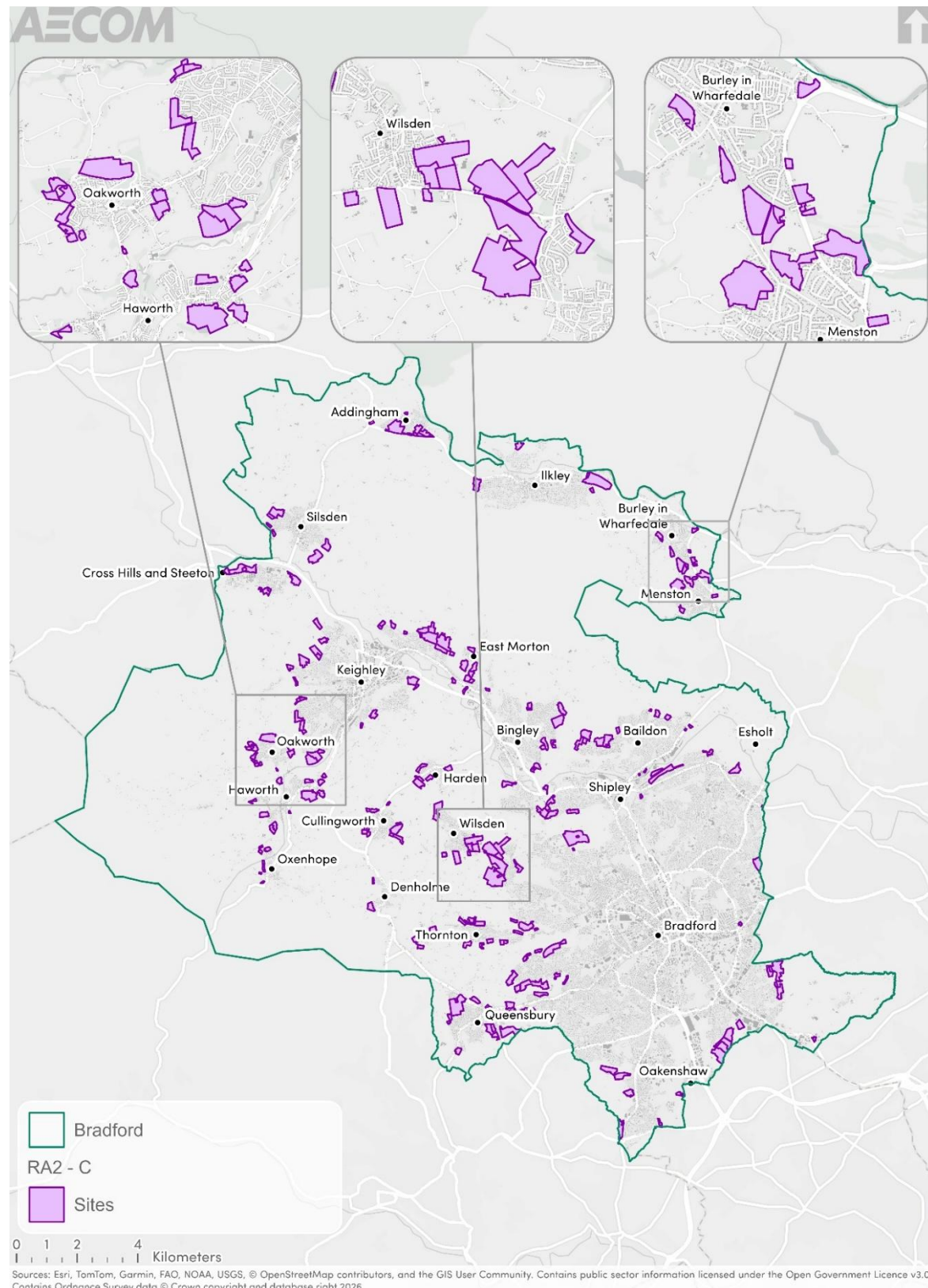
(variable / residual pool of sites and regeneration areas mapped)



Nb: not all sites would be required to meet identified needs. There would therefore be a degree of flexibility in site selection under this approach.

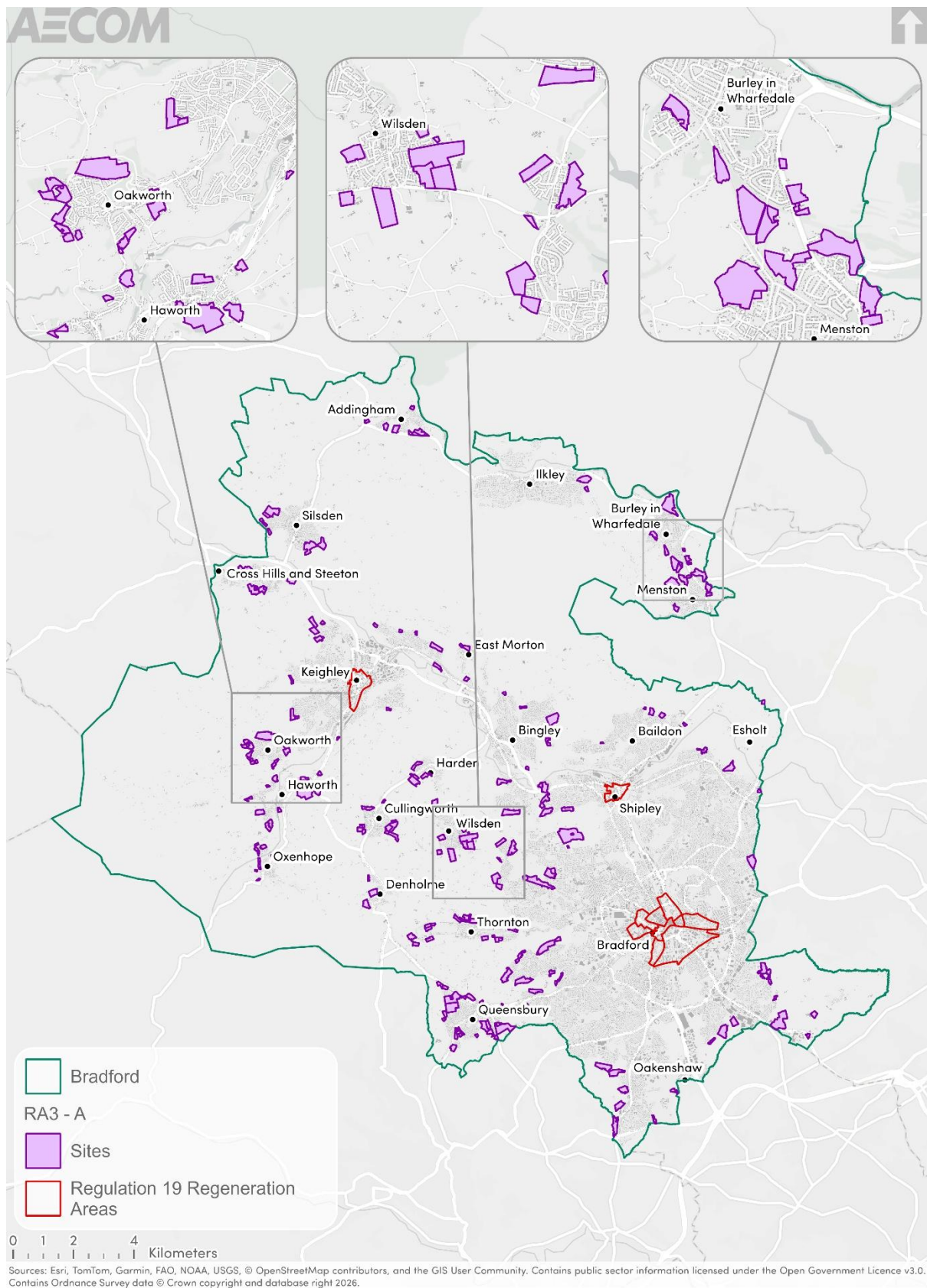
Figure 6: RA2C Urban edge expansion without reliance on Regeneration Areas

(variable / residual pool of sites)



Nb: not all sites would be required to meet identified needs. There would therefore be a degree of flexibility in site selection under this approach. However, not relying on Regeneration Areas would increase the number of dwellings required from this residual pool of sites.

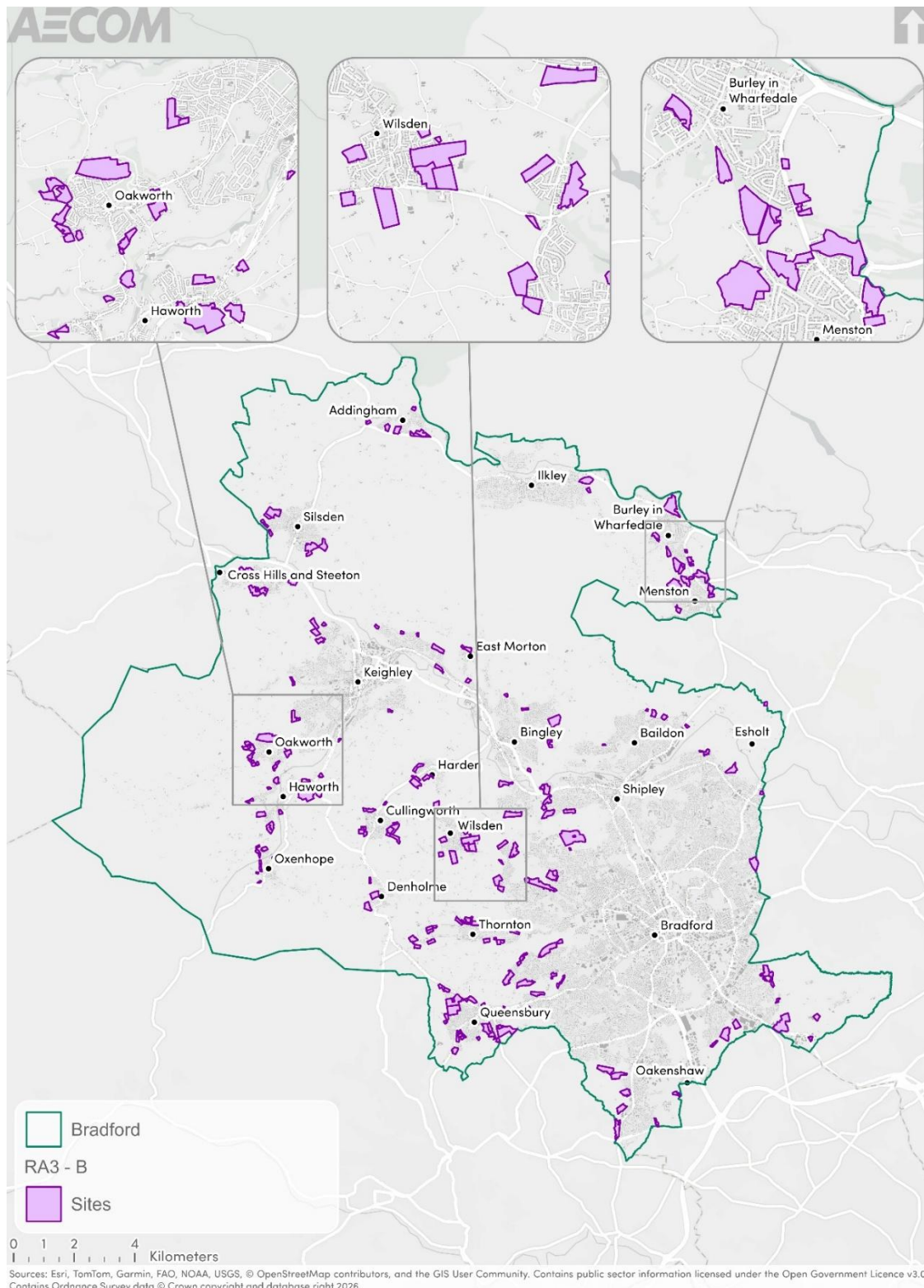
Figure 7: RA3A Grey Belt-led strategy (variable / residual pool of sites and regeneration areas mapped)



Nb: not all sites would be required to meet identified needs. There would therefore be a degree of flexibility in site selection under this approach.

Figure 8: RA3B Grey Belt-Led strategy without reliance on Regeneration Areas

(variable / residual pool of sites)



Nb: not all sites would be required to meet identified needs. There would therefore be a degree of flexibility in site selection under this approach. However, not relying on Regeneration Areas would increase the number of dwellings required from this residual pool of sites.

5. Appraisal of strategic alternatives for housing growth

- 5.1.1. All reasonable alternatives were assessed on a consistent basis using the Integrated Appraisal framework. This framework considers a range of environmental, social and economic issues (including health and equality factors), allowing the different options to be compared in a fair and transparent way. The assessment found that each option has strengths and weaknesses, and that no single option performs best against all objectives.
- 5.1.2. The appraisal identified a number of clear trade-offs between the alternatives. Options that focus more growth within existing urban areas, particularly RA1A and RA1B, generally perform best in terms of access to jobs and services, sustainable travel opportunities, making efficient use of land, and protecting environmental assets such as landscapes, wildlife and heritage. However, these options may provide less flexibility to accommodate future growth and rely more heavily on opportunities within existing urban areas.
- 5.1.3. At the other end of the spectrum, RA2C and RA3B perform strongly in terms of housing delivery and economic growth because they provide the greatest capacity for development. However, these benefits are generally accompanied by greater environmental impacts and a higher likelihood of development taking place in locations that are less well connected to services, jobs and public transport.
- 5.1.4. RA2B and RA3A represent more balanced approaches, spreading growth across a wider range of locations. These options can help support a broader range of communities and local services, but tend to perform less well in relation to accessibility and can result in greater environmental impacts than options that focus development in the main urban areas.
- 5.1.5. The Preferred Option and RA2A also occupy a middle position within the assessment. Both perform well across a range of social and economic objectives and maintain a strong focus on Bradford and the district's larger settlements. However, these benefits are accompanied by environmental trade-offs associated with urban extensions and development on greenfield land. In particular, the Preferred Option performs less favourably in relation to agricultural land, as it is likely to affect a relatively large amount of Best and Most Versatile farmland. As a result, while both options perform relatively well overall, they do not consistently outperform the more dispersed alternatives across all environmental objectives.
- 5.1.6. Overall, no single option performs best in every respect. The differences between the alternatives largely reflect the balance between supporting growth, providing access to jobs and services, meeting infrastructure needs, and protecting the environment.

IA Topic / Objectives	PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
Communities, population and housing (Housing)	+++ ?	++	+++ ?	+++ ?	+++ ?	+++	+++ ?	+++
Communities, population and housing (Equalities)	++?	++	++	+++?	+++?	+++?	+++?	+++?
Health and Wellbeing (Positive effects)	++	++ ?	++	++	++	++	++	++
Health and Wellbeing (Negative effects)	-	-	--?	-	-	--	-	--
Employment and Economy	+++	++	+++	+++	++	+++	++	+++
Natural Environment (Landscape and townscape)	--	0	--	--	--	---	-	--
Natural Environment (Biodiversity)	-	+	-	-	--	---	--	---
Built Environment (Heritage)	-	+	-	-	--	--	-	--
Connectivity (Transport)	+?	++	++	+	0	-	0	-
Connectivity (Sustainable community growth)	+++	+++	++	++	++	++	++	++
Climate and Resources (Addressing causes of climate change)	+	++	++	+	0	-	0	-
Climate and Resources (Climate change resilience)	0	-	0	0	0	0 ?	0	0
Climate and Resources (Land, soil, minerals and waste)	--	0	-	-	-	--	-	--
Climate and Resources (Water)	0	+?	0	0	0	0	0	0
Climate and Resources (Air quality)	+	+	+?	+	0	0	0	0

+++	Major positive	++	Moderate positive	+	Minor positive	0	Neutral	-	Minor negative	--	Moderate negative	---	Major negative
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6. Rationale for the preferred option

6.1. Housing strategy

- 6.1.1. The Council considered a range of alternative ways of accommodating future housing growth across the district. Some options focused more heavily on redevelopment within existing urban areas, while others relied to a greater extent on urban extensions, Grey Belt or Green Belt release, or higher overall levels of growth. Each option offered different benefits and challenges. For example, options focused largely on urban land generally reduced impacts on the countryside but were less flexible in terms of housing delivery and offered fewer opportunities to meet needs across the wider district. By contrast, options involving more dispersed growth or larger releases of undeveloped land provided greater development capacity but were generally associated with greater environmental impacts and, in some cases, less sustainable patterns of development.
- 6.1.2. The Council concluded that the Preferred Option provides the most balanced overall approach which links housing, infrastructure and regeneration opportunities at scale. It focuses significant housing growth on the regional city and towns – including Keighley, Shipley and the district's other main settlements, supports regeneration and the reuse of previously developed land, and provides sufficient flexibility to meet housing needs throughout the plan period. The approach is weighted towards growth in the most sustainable locations but not without providing growth options throughout the settlement hierarchy.
- 6.1.3. While the strategy still requires some development on greenfield, Grey Belt and Green Belt land, this is intended to be more limited and targeted than under several of the alternatives. The Council recognises that the Preferred Strategy is not the best-performing option against every sustainability objective; for example, it is likely to affect a relatively large amount of higher-quality agricultural land. Nevertheless, when all social, economic and environmental considerations are considered together, the Council considers that it represents the most appropriate balance between housing delivery, regeneration, environmental protection and the long-term needs of communities across the district.

6.2. What about employment growth options?

- 6.2.1. The Council reviewed whether reasonable strategic alternatives existed for accommodating identified employment needs. Unlike housing growth, where a broad range of spatial distributions could realistically deliver the required level of development, the employment land evidence identified a relatively limited number of sites capable of meeting the district's needs for industrial, logistics, distribution, research and development, and other employment uses.
- 6.2.2. The suitability of employment sites is heavily influenced by factors such as site size, market attractiveness, access to the strategic highway network, operational requirements, deliverability and proximity to existing employment clusters. As a result, there was limited scope to develop genuinely distinct strategic employment strategies capable of meeting identified needs.
- 6.2.3. Consequently, the council focused on the assessment of alternative employment sites and employment allocations, which represented the only area where meaningful choices existed. The selection of employment land was informed by the Employment Land Review, site assessment evidence and plan-making considerations. No separate strategic employment growth scenarios were considered necessary because the evidence did not identify a sufficient range of realistic and deliverable alternatives capable of meeting employment needs in materially different ways.

7. Appraisal of the Regulation 19 version of the Local Plan

7.1. How was the Local Plan assessed?

- 7.1.1. The IA assessed the Regulation 19 Local Plan against a range of environmental, social and economic objectives. The assessment considered the likely effects of both the spatial strategy and the proposed policies, including how policies could help avoid, reduce or mitigate potential adverse effects.

7.2. Main Findings

- 7.2.1. The appraisal shows that the Bradford Local Plan is likely to deliver substantial benefits for the district through the provision of new homes, employment opportunities, regeneration initiatives and supporting infrastructure. The scale and distribution of growth are expected to contribute positively to wider social outcomes, including reducing inequalities, supporting healthier communities and directing investment towards areas that experience some of the greatest socio-economic challenges.
- 7.2.2. Much of the proposed growth is focused within, or adjacent to, the main urban areas and larger settlements where access to jobs, services, education, healthcare and public transport is generally strongest. This approach helps to support more sustainable patterns of development, reduces the need to travel long distances for day-to-day activities and creates opportunities to maximise the benefits of existing and planned transport investment. Whilst growth will inevitably generate additional travel demand and there remains a risk that car usage could increase, particularly where public transport connectivity is less comprehensive, the Plan seeks to address this through policies that promote sustainable transport, active travel and improvements to public transport infrastructure. As a result, the overall transport performance of the Plan is considered positive, albeit dependent on the successful delivery of supporting infrastructure and modal shift measures.
- 7.2.3. The appraisal also recognises that accommodating Bradford's development needs involves important environmental trade-offs. In particular, the loss of greenfield land and some high-quality soil represents one of the more adverse effects identified. There is also potential for adverse effects on landscape character, biodiversity and the setting of heritage assets. Whilst mitigation measures embedded within the Plan are expected to avoid, reduce or offset many impacts, some residual effects are likely to remain. Nevertheless, the assessment finds that the environmental effects are generally localised and can be moderated through careful site design, policy safeguards and project-level mitigation.

- 7.2.4. The trade-offs need to be considered in the context of the realistic alternatives available. A more dispersed pattern of growth, or greater reliance on less accessible locations, could increase reliance on private car travel, reduce access to services and jobs, and in some cases result in greater impacts on landscape character and biodiversity.
- 7.2.5. The Plan therefore reflects a balance between protecting environmental assets, supporting socio-economic benefits and directing growth towards locations that are capable of supporting more sustainable patterns of travel.

Table 7.1 Overall effects of the Local Plan

IA Topic / Objectives	Effects
Communities, population and housing (Housing)	Major positive
Communities, population and housing (Equalities)	Major positive / Minor Negative
Health and Wellbeing	Major positive / Minor Negative
Employment and economy	Major positive
Natural Environment (Landscape and townscape)	Moderate positive Moderate negative
Natural Environment (Biodiversity)	Neutral
Built Environment (Heritage and townscape)	Moderate positive Minor Negative
Connectivity	Moderate positive
Climate and Resources (Addressing causes of climate change)	Minor positive
Climate and Resources (Climate change resilience)	Minor positive
Climate and Resources (Land, soil, minerals and waste)	Minor negative
Climate and Resources (Water)	Neutral
Climate and Resources (Air quality)	Minor positive

8. Summary of mitigation and enhancement

- 8.1.1. At an interim stage of the appraisal process (i.e. the appraisal of the draft Plan and a range of plan options at Regulation 18 stage), the IA made a range of recommendations aimed at mitigating negative effects and enhancing the positives. Key themes were as follows:
- Introducing more ambitious renewable energy and climate measures.
 - Strengthening green infrastructure and biodiversity enhancement policy measures.
 - Take a stronger approach to brownfield-first growth, whilst also seeking to protect Green Belt and the best and most versatile agricultural land (BMV) and minimise greenfield loss.
 - Implement Sustainable Urban Drainage Systems, encourage natural flood management and higher standards of water efficiency.
 - Make improved walking, cycling and public transport provision key to development.
 - Ensure that health, education and community infrastructure accompanies growth in a timely manner, especially at Sustainable Urban Extensions.
 - Reduce car dependency through a sustainable spatial distribution of development.
- 8.1.2. These recommendations have been taken into account when finalising the Plan policies to varying extents, but broadly speaking are reflected by:
- The sequential approach to development proposed by Policy SS1, which seeks to maximise urban capacity to a reasonable extent.
 - A strategic approach to managing climate change, the water environment and flood risk.
 - Identifying locations for growth that have good access to services and sustainable transport.
 - Introduction of site-specific measures to deal with identified constraints.
- 8.1.3. At Regulation 19 stage the draft Plan policies have been re-appraised and considered 'as a whole'. The broad strategy is largely unchanged from Regulation 18 stages, and so no significantly different strategic recommendations have been identified. It is also the case that policies have been updated in response to earlier recommendations, and the level of detail and justification has increased for each policy. Therefore, the scope for residual recommendations is relatively limited.
- 8.1.4. The appraisal has not identified any significant deficiencies in the policy framework that would necessitate fundamental changes to the Plan's strategy or allocations.

- 8.1.5. The majority of residual adverse effects arise from the inherent consequences of accommodating development to meet identified housing and employment needs.
- 8.1.6. Nevertheless, opportunities exist to further strengthen the Plan through minor amendments relating to the protection of agricultural soils, the enhancement of ecological networks through Biodiversity Net Gain delivery, and the early provision of sustainable transport connections associated with major development sites.

9. Monitoring and next steps

9.1. What Happens Next?

- 9.1.1. The Integrated Appraisal Report accompanies the Regulation 19 version of the Bradford Local Plan and has informed its preparation.
- 9.1.2. Following consultation, Bradford District Council will consider all comments received on both the Local Plan and the Integrated Appraisal before submitting the Plan for independent examination.
- 9.1.3. The examination will consider whether the Local Plan has been prepared in accordance with legal requirements and whether it is sound. If adopted, the Council will continue to monitor the effects of the Plan and publish a Sustainability Appraisal Adoption Statement.

9.2. Monitoring the Effects of the Plan

- 9.2.1. Monitoring will help the Council understand whether the Local Plan is delivering the anticipated environmental, social and economic outcomes and identify whether any unexpected effects arise. The monitoring framework only needs to be completed upon adoption of the Plan. However, key areas that will be expected to be monitored (by virtue of the impacts identified) include:
- Delivery of regeneration and previously developed land opportunities.
 - Loss of greenfield land and Best and Most Versatile agricultural land.
 - Biodiversity Net Gain delivery and habitat connectivity outcomes.
 - Delivery of sustainable transport infrastructure and travel behaviour trends.
 - Infrastructure capacity in growth areas, including education, healthcare and transport.
 - Cumulative landscape effects associated with multiple allocations.
 - Housing delivery in comparison with planned growth assumptions.