AECOM

Integrated Appraisal (IA) of the Bradford Local Plan

IA Report accompanying the Regulation 19 Consultation Plan

City of Bradford Metropolitan District Council

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Quality information

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1. Introduction

1.1 Background

1.1.1 AECOM has been commissioned by City of Bradford Metropolitan District Council to lead on an Integrated Appraisal (IA) in support of the emerging Local Plan.

1.1.2 This document is the IA Report, which describes the steps within the Integrated Appraisal that have been undertaken throughout the plan-making process. The report contains all the information required to satisfy legislative requirements and is a key piece of evidence.

1.2 Integrated Appraisal (IA) explained

1.2.1 IA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising positive effects. IA involves undertaking the legally required Sustainability Assessment[1] process alongside: Equality Impact Assessment (EqIA), which is undertaken to discharge the Public Sector Equality Duty; and Health Impact Assessment (HIA) to have regard to health impacts and promote the reduction of health inequality.

1.2.2 To ensure meaningful integration between these different impact assessment tools and therefore avoid duplication, the processes are combined and presented in one report (rather than a series of separate reports). Further details relating to the integration process are provided in the scoping report.

1.2.3 It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. There is established practice and guidance in relation to the SA of Local Plans, and therefore this process is a solid foundation upon which the Integrated Appraisal is based (drawing in the features of EqIA and HIA as appropriate).

1.2.4 In line with regulations and guidance, a report (in this case known as the IA Report) must be published for consultation alongside the draft plan that essentially 'identifies, describes, and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.

1.2.5 More specifically, the IA Report should answer two key questions:

1. What has plan-making / IA involved up to this point?

– Including with regards to the consideration of 'reasonable alternatives'.

2. What are the IA findings at this stage?

– i.e., in relation to the pre-submission plan.

[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of IA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2026). The Town and Country Planning (Local Planning) Regulations 2012 require that an IA Report is published for consultation alongside the 'Proposed Submission' plan document.

2. Scoping Summary

2.1 Introduction

2.1.1 The aim here is to summarise the scope of the IA, i.e., the sustainability themes and objectives that should be a focus of (and provide a broad methodological framework for) the IA. Further information on the scope of the IA including a more detailed review of the sustainability issues and objectives as highlighted through a review of the sustainability 'context' and 'baseline', is presented in a new IA Scoping Report.

2.1.2 The IA is being driven by the SA / SEA process to ensure legal compliance (whilst also weaving in elements of EqIA and HIA).

2.1.3 The SEA Regulations[2] require that "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". In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.

2.2 Key Issues and IA Framework

2.2.1 A key output from scoping is the IA framework, which is essentially a summary table of the scope, identifying the IA themes and objectives that will be a focus for the IA. The IA framework for the Bradford Local Plan is presented in the Scoping Report and is formed of seven IA themes and their associated objectives and guiding 'questions'. Taken together, the sustainability objectives and supporting criteria provide a methodological 'framework' for the appraisal of the Bradford Local Plan and reasonable alternatives. The key issues that have informed the development of this framework are provided below[3].

Communities, population and housing

- Projected population growth in Bradford could lead to a greater demand on services and infrastructure, which could in turn adversely impact upon experienced deprivation linked to accessing important facilities across the area. The Government's Levelling Up and Regeneration Bill notably seeks to reduce regional inequalities and promote economic growth and opportunities in less prosperous areas. It has been designed to address regional disparities, stimulate economic development, and enhance infrastructure and community well-being in order to create a more balanced and inclusive nation.
- National policy and guidance seek to ensure that new housing developments are supported by necessary infrastructure; notably the Planning and Infrastructure Act seeks to streamline the planning process to maximise coordinated housing and infrastructure delivery. This reflects, for example, the Building for a Healthy Life design framework which promotes the delivery of high-quality housing developments with a focus on connectivity, community integration, and sustainability.

[2] Environmental Assessment of Plans and Programmes Regulations 2004.
[3] The key issues have evolved over time, with those presented below being replicated from the updated scoping report.

- Crime rates in Bradford are high; the most common crimes are linked to violence and theft, and there are higher levels of experienced crime within the city centre and along the Bingley Road / Bradford Road / Keighley Road transport corridor. Further development in Bradford could exacerbate crime by potentially bringing forward additional growth within and in proximity to areas that experience greater levels of crime, and encouraging more people into the area to live and work. However, it is also recognised that there is potential for development to contribute towards safer communities depending on development design - for example, through increasing natural surveillance of streets and roads.
- Future growth may put an increased demand on housing supply and affordability in Bradford. Ensuring an appropriate mix of housing types, tenure will become more important to supporting a diverse population in the area. It will also be important to improve the energy efficiency and standards of existing housing stock, so that existing development can more effectively meet the needs of the Bradford population.
- The Levelling-up and Regeneration Act 2023 introduces reforms to accelerate the delivery of new homes and infrastructure, aligning with the government's levelling-up agenda. This reflects the latest reforms to the NPPF which aim to refine planning policies to better support housing supply and infrastructure needs. The emerging 10-Year Infrastructure Strategy is also relevant in this respect, ensuring new development is supported by necessary transport, utilities, and social infrastructure.
- As more services move online, digital connectivity is becoming an important component of accessibility. It will be important to ensure Bradford retains its high level of connectivity.

Health and inequalities

- Despite improvements in educational attainment, qualification levels among Bradford’s working age population are lower than the regional and national averages, particularly within the more deprived urban areas. 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.
- The general health of Bradford District’s population tends to be poorer than other parts of the country. This is particularly the case in more deprived areas. The main causes of death in Bradford 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 an increase in life expectancy; although it remains lower than average. It also varies across the area, depending on where people live.
- Significant inequalities in health outcomes persist across the district, with a life expectancy gap of 12.4 years for males and 10.2 years for females between the most and least deprived areas. Health inequalities are closely linked to wider determinants of health, including deprivation, employment, education, housing quality, environmental conditions and access to services.

- Some communities and population groups experience multiple and intersecting forms of disadvantage, meaning that the Local Plan should consider the potential for differential effects on protected and vulnerable groups.
- 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 to problems with ill health. Therefore, it will be important for policies to ensure that opportunities are provided for local people, to encourage participation in physical activity, in order to improve health and wellbeing in the area.
- Bradford District is notably deprived, and has variable levels of deprivation spatially. There are higher levels of deprivation linked to crime and education, skills and training domains. Additionally, the District is the 4th most deprived in relation to income, and the 5th most deprived in relation to employment. Other key deprivation measures show elevated 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 those in more deprived neighbourhoods, as well as support community cohesion.

Economy

- Bradford has lower qualification levels than regional and national averages. Only 27.4% of residents hold Level 4 qualifications or above, while 24% have no qualifications, which may limit access to higher-skilled employment and investment opportunities. As such, there is a relatively high proportion of residents employed in lower-skilled occupations, and lower concentrations of professional and managerial occupations.
- A large proportion of neighbourhoods in Bradford and Keighley experience high levels of employment and income deprivation. This is likely linked to falling employment rates in the area, and due to average earnings being lower than regional and national averages. Bradford also ranks among the most deprived authorities in England for child income deprivation, indicating persistent socio-economic challenges.
- Although Bradford has a diverse economy and strong entrepreneurial base, the local economy is heavily dominated by micro and small businesses. Supporting business growth and expansion will be important to increase higher-value employment opportunities.
- Regeneration is a key priority across the District (see Figure 4.1), with significant investment presenting opportunities to improve the economy, townscape, public realm and community wellbeing. Ensuring that the benefits of regeneration are delivered sustainably and are shared across all communities will be an important consideration for the emerging Local Plan.

- There is an identified small shortfall in employment land compared with the requirements and uncertainty over the deliverability of some allocated sites. This could restrict future business growth and inward investment if additional employment land is not brought forward. This is of concern given that Bradford city centre experiences higher-than-average retail vacancy rates and a significant loss of retail spending to competing centres, particularly Leeds.

Natural environment

- The landscape is an important feature of the area, forming a key part of its identity. There is a need to ensure that 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.
- Local landscape character is an important consideration, often lending to community identity within local authorities. The 2026 Landscape Character Assessment will be a key document to help inform future development in Bradford, ensuring growth reflects important character and quality.
- Much of the Bradford area is within the South and West Yorkshire Green Belt, which is designated to prevent the uncontrolled growth and potential merging of settlements, to safeguard the countryside, and to preserve the setting and special character of settlements. Recent changes to national planning policy, including updates to the NPPF, place greater emphasis on considering Green Belt land where there is unmet housing need. This could result in development coming forward on land previously identified as being within the Green Belt.
- There is a clear policy framework for protecting and restoring the natural environment, requiring development and plan-making to deliver measurable biodiversity gains, strengthen green infrastructure networks and long-term environmental resilience, while safeguarding protected sites and species and supporting climate, health and wellbeing objectives.
- 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.
- In relation to SSSIs within and in proximity to Bradford, a key consideration for new development will be SSSI IRZs, and the need to engage with Natural England where proposed development poses a potential risk to a SSSI nearby.

- The area also supports a range of wildlife habitats and species. These include a number of nationally and locally identified priority habitats and species. Emerging policies and proposals will need to consider these species and habitats and their integrity. It will also be important to ensure that future development contributes positively to on-going protection and enhancement of the areas.
- Under the Environment Act 2021, local authorities now have a duty to enhance local ecosystems and biodiversity. This is executed through Local Nature Recovery Strategies. The West Yorkshire Local Nature Recovery Strategy identifies measures to protect and enhance biodiversity in Bradford, and also presents areas that could be used to expand the biodiversity network in the District. It will be important to consider the Local Nature Recovery Strategy in future development, to ensure that growth comes forward that contributes positively to the natural environment.
- The Environment Improvement Plan sets interim targets aligned to national climate change objectives, including reducing the risk of harm to people, the environment, and the economy from natural hazards. To deliver climate resilience, the Plan provides a structured roadmap for improvement which will set the strategic context for local policy development.

Built environment

- Bradford has an array of designated historic assets that contribute to 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, 60 conservation areas, 2,289 listed buildings, 16 registered parks and gardens, and one registered battlefield. It is important that these assets, together with their settings, are protected and enhanced, and where appropriate their condition improved – especially in relation to heritage assets included on the Heritage at Risk register. Site allocations and development proposals will need to reflect the character of designated heritage assets through development design, with associated conservation area appraisals and the Saltaire World Heritage Site management plan and guidance used to inform development design.
- National policy requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk. As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflect current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character.
- The conservation area assessments will require monitoring and periodic review to remain current and relevant as development pressures evolve.

Connectivity

- The District has an extensive road and public transport network that link its communities and provides access to employment and services for local people. The road network suffers from 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).
- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliability of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety.
- Delivery of active travel, bus, and wider transport improvements is notably dependent on external funding and developer contributions, creating uncertainty around timing and implementation. Where sustainable transport infrastructure is unable to be delivered early enough to support new development, long-term car dependency is likely to prevail.
- National planning policy recognises that sustainable transport solutions will vary between urban and rural environments, with tailored frameworks set out through local and regional transport plans/ strategies. Notably the West Yorkshire Local Transport Plan seeks to bring about improvements such as these.

Climate and resources

- 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 implementation of best practice measures. The Environmental Improvement Plan (EIP) sets out a series of actions aligned with commitments, for example to reduce NO_2 emissions by 72% from a 2005 baseline level. Actions include utilising data access to inform local interventions in communities where those most vulnerable to air pollution are exposed to higher levels.
- CO_2 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.
- The most polluting sector in relation to greenhouse gas emissions is the domestic sector, followed by the transport sector, and the industrial sector. Policies and proposals should seek to reduce emissions where possible, including through encouraging an uptake in electric vehicle usage and sustainable / active transport opportunities, as well as design stipulations that reduce emissions linked to an increase in activity in Bradford.

- Gas and electricity consumptions in Bradford are higher than consumptions in other regional local authorities, and has fallen overall in recent years. This has likely contributed to the experienced fuel poverty in the area. 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.
- The quality of the various rivers within the District varies with a number being classed as moderate, poor or bad, thereby not meeting Water Framework Directive (WFD) standards. It is therefore important that water quality is improved, to meet WFD standards, with emerging policies and proposals considering impacts on the water environment. Water resources also need to be safeguarded.
- Growth in Bradford is likely to increase water demand / consumption, linked to an increase in the population and associated activities requiring water resources (e.g., water for drinking, water for washing etc). This could also lead to increased pressure within the wastewater infrastructure network in Bradford. Without measures in place to improve efficiency and reduce consumption, there is a risk that water resources and availability could decrease. However, it is considered that the provisions included in Yorkshire Water's Water Resource Management Plan (WRMP) and Drainage and Wastewater Management Plan (DWMP) will contribute positively to securing efficiency improvements and water sources, and protect and enhance the wastewater infrastructure network.
- There are various sources of flood risk within Bradford. The impact of development on water management in the area will need to be considered. This should include assessing the risk of flooding, reducing the potential risk, and mitigating flood effects – in relation to protect housing, infrastructure, and human wellbeing. Future development should contribute to reducing flood risk via the provision of appropriate drainage infrastructure, including the use of Sustainable Urban Drainage Systems (SUDS).
- The 25-year Environment Plan and EIP focus on key priority areas including the water environment. The EIP sets interim targets – in particular, that water resources are clean, resilient, and plentiful by supporting catchment partnerships and natural drainage solutions.
- Development outside of the urban areas could result in the loss of agricultural quality land, the loss of which cannot be mitigated. As such, it will be important for development to be steered towards lower quality land and identified brownfield opportunities. National policy, notably the NPPF, 25-Year Environment Plan, and the Environment Improvement Plan, encourage efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains. This supports the Soil Strategy for England which seeks to ensure that all England's soils will be managed sustainably.

- 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 the 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, though there was a temporary increase during the Covid-19 pandemic. Most of this is sent for re-use, recycling or composting. Therefore, it is important that emerging policies and proposals seek to continue to support the reduction in waste generated and encourage greater re-use, recycling and composting.
- Bradford supports several 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 materials to reduce the need for primary mineral extraction.

Table 2.1: The IA framework

IA Themes and Objectives	Supporting questions… Will the plan / option?
1.Communities, population and housing (Housing) a) To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups.	• Increase the number of additional homes delivered to meet local needs? • Provide affordable homes of the right size and tenure to meet local needs? • increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)? • increase the delivery of the right size of housing to address local needs, including family sized housing (three bed or more)? • increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range of users/occupants; such as those with disabilities, wheelchair users and families with children? • Increase delivery of accommodation for those groups who require specialist care and support? • Provide appropriate accommodation for gypsy and traveller communities and other specialist groups?
2.Communities, population and housing (Equalities) a) To support equality and diversity, whilst promoting social cohesion, encouraging participation and improving the quality of life (particularly in deprived neighbourhoods).	• Reduce inequalities and deprivation across the plan area? • Improve equality of opportunities amongst the groups most in need? • Promote, strengthen, and enhance placemaking principles? • Protect and provide improved local, social, recreational and leisure facilities and access to the natural environment? • Ensure an appropriate mix of dwelling sizes, types, and tenures to meet the needs of all sectors of the community? • Support the ageing population to ensure they do not become socially excluded? • Ensure there is adequate provision of facilities and services for minority groups?

IA Themes and Objectives	Supporting questions… Will the plan / option?
3.Health and wellbeing a) 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. b) To create good cultural, leisure and recreation activities available to all. c) To improve safety and security for people and property.	• Support healthy / active and inclusive environments? • Provide formal and informal, and natural play spaces for children which are safe and easy to access? • Improve physical and mental health outcomes for existing and future residents? • Reduce health inequalities, particularly within the district's most deprived communities? • Improve access to healthcare facilities, community services and social infrastructure? • Create safe, inclusive and accessible places that promote social interaction, wellbeing and community cohesion? • Reduce the potential for adverse effects on health arising from environmental factors, including poor air quality, noise and pollution?
4.Economy and Employment a) Increase the number of additional jobs delivered, particularly for high-skilled/paid employment opportunities. b) Ensure that job opportunities are suited to the needs of the local workforce across all age groups, as well as providing new opportunities for training and education c) To deliver economic growth through attracting significant investment to provide new/enhance employment floor space, new development within regeneration areas and town centres, as well as through the expansion of existing businesses.	• Support the creation of new jobs, particularly high value and skilled economic sectors. • Ensure new employment opportunities are located within accessible locations to the district's population, particularly those living within most deprived areas encourage developers to demonstrate how they are investing in skills and employing local people. • Ensure the capacity of educational facilities keep pace with population growth? • Protect and retain an adequate supply of employment floor space to address business needs? • Support the redevelopment / intensification of existing employment land to provide additional and high-quality employment floor space? • Safeguard existing town centres and support their vitality? • Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment? • Promote a green economy and decarbonisation? • Promote the vitality of rural economies?

IA Themes and Objectives	Supporting questions… Will the plan / option?
5.Natural Environment (Landscape and townscape) a) To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes	• Protect and enhance local character, distinctiveness & sense of place? • Respect the distinctive features and characteristics of the eight landscape character types as established through the LCA? • Use new and existing natural landscape features to mitigate any potential effects on nearby and distance interpretations of its landscapes? • Contribute to the preservation and enhancement of the special qualities of the Yorkshire Dales National Park and the Nidderdale National Landscape? • Avoid development of Green Belt that could have a significant impact on key purposes and prioritise previously developed and grey belt sites within this designation?
6.Natural Environment (Biodiversity) a) To conserve and enhance geodiversity and biodiversity, including; designated and locally important species and habitats; maintaining and strengthening ecological corridors and identifying, protecting and enhancing supporting habitats.	• Avoid or mitigate adverse impacts on internationally and nationally designated sites and their integrity? • Improve the condition of designated sites with indicators showing progress towards favourable condition in SSSI units? • Contribute towards the Environmental Improvement Plan's target of protecting 30% of the UK's land by 2030 in order to restore nature and promote species abundance? • Protect and enhance locally important sites including those important for connectivity? • Contribute towards West Yorkshire Local Nature Recovery Strategies? • Deliver net gains for biodiversity, including via supporting connected and resilient ecological networks and habitat creation and restoration? • Prevent habitat loss, fragmentation, and degradation, maintaining or improving connectivity through wildlife corridors and ecological networks? • Support the conservation and enhancement of priority habitats and protected species?

IA Themes and Objectives	Supporting questions… Will the plan / option?
7.Built Environment (Heritage) 7a) To sustain and, where appropriate, enhance the significance of heritage assets and their setting	• Preserve and enhance the significance of buildings and structures of architectural, cultural and / or historic interest, both designated and non-designated, and their settings? • Preserve and enhance the special interest, character and appearance of conservation areas and their settings? • Preserve and enhance the special interest, character and appearance of the Saltaire World Heritage Site and its settings? • Conserve and enhance archaeological remains, and archaeologically sensitive areas, and support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Support the conservation and enhancement of heritage assets at risk? • Promote opportunities for celebrating heritage and engaging the local population, in order to enhance the understanding of the historic environment of Bradford? Support heritage-led regeneration?
8.Connectivity (Transport) 8a) To develop and maintain an integrated, efficient and accessible transport network that maximises access, increases sustainable transport choice, reduces congestion, and reduces the need to travel by private car/ lorry.	• Support the objectives of the West Yorkshire Local Transport Plan? • Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport? • Reduce the need to travel with sustainable patterns of land use and development? • Be able to deliver the necessary mitigation to reduce its impact on the highways network? • Provide opportunities to improve frequency and availability of public transport services, particularly for the more rural communities? • Encourage a modal shift to more sustainable and active forms of travel, such as walking and cycling and use of public transport? • Prioritise sustainable transport options over car and lorry use where possible? • Provide adequate cycle parking and storage options? • Facilitate working from home and remote working?

IA Themes and Objectives	Supporting questions… Will the plan / option?
9.Connectivity: Sustainable community growth 9a) To ensure that communities have good access to a range of good quality services and connections to wider social, environmental and economic networks.	• Facilitate good access to healthcare, social, recreational and leisure facilities for all sectors of the community? • Enhance multifunctional green infrastructure networks and connectivity throughout the plan area? • Improve access to green spaces, open spaces, the countryside and leisure and recreation facilities? • Support healthy / active and inclusive environments? • Support the creation of cohesive, connected communities?
10.Climate and Resources: Addressing Causes of Climate change 10a) Ensure the prudent and efficient use of energy and resources, whilst promoting the use of renewable and low carbon energy sources. 10b) To reduce greenhouse gas emissions by supporting development that promotes sustainable travel, reduces the need to travel, and facilitates the transition to low-carbon transport.	• Ensure new developments are energy efficient? • Reduce greenhouse gas emissions to accelerate to net zero? • Expand EV charging infrastructure to support the shift to electric and low emission vehicles? • Support the delivery of low carbon and renewable energy generation? • Promote sustainable transport options that reduce transport emissions? • Improve the energy efficiency of historic buildings, taking into account their embodied carbon value?

IA Themes and Objectives	Supporting questions… Will the plan / option?
11.Climate and Resources: Climate Change Resilience 11a) Minimise and manage the impacts of climate change on the District and vulnerability to its effects, particularly flood risk and overheating.	• Increase the resilience of the built and natural environment to the future effects of climate change, e.g. overheating and increased storm severity? • Ensure that the potential risks associated with climate change are considered in new development in the District? • Support urban greening and increased tree cover in new development? • Protect, improve and extend green, blue infrastructure networks within the District and wider areas to support climate change adaptation? • Utilise nature based sustainable drainage systems to sustainably manage/reduce surface water run-off? • Minimise flood risk for key infrastructure?
12.Climate and Resources (Land, soil, minerals and waste) 12a) To prioritise the development of previously developed land and buildings including via the remediation of contaminated land and protection of greenfield sites. 12b) Protect agricultural land and soils and avoid the loss of the highest-quality grades. 12c) To protect mineral resources from sterilisation by other uses and promote the greater use of secondary and recycled materials.	• Minimise the loss of high-quality agricultural land, and encourage brownfield development as far as possible? • Encourage the retention and reuse of buildings wherever possible in preference to demolition? • Promote a circular waste economy? • Continue to reduce waste from different sources and increasing recycling rates • Safeguard mineral resources within Mineral Safeguarding Areas, ensuring that non-mineral development does not prevent future extraction?

IA Themes and Objectives	Supporting questions… Will the plan / option?
12d) To minimise different types of waste and increase the amount that is re-used, recycled and recovered.	
13.Climate and Resources (Water) 13a) Reduce water consumption, improve water quality, and ensure an adequate supply of water can be provided in Bradford whilst also reducing the potential for contamination of waterbodies and groundwater.	• Avoid negative impacts on the chemical and ecological status of water, and support improvements to water quality where achievable and appropriate? • Avoid encroachment into riparian environments? • Provide the potential to improve water efficiency? • Support re-naturalisation of watercourses? • Support the use of nature-based SUDs to reduce pollution and improve quality of water resources? • Provide appropriate pollution control at a strategic level? • Ensure development is supported by sufficient wastewater infrastructure in a timely manner?
14.Climate and Resources (Air quality) 14a) To safeguard and improve air quality and reduce the impacts upon human health.	• Minimise traffic congestion and encourage active travel and public transport use? • Ensure new and existing communities are not adversely affected by poor air quality including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development • Ensure the location of new development prioritised within the most sustainable locations of the district such as the City of Bradford (including Shipley), followed by principal towns, local growth centres and local service centres, in line with the Local settlement hierarchy • Support a reduction in air pollution for key pollutants, including carbon dioxide emissions? • Provide any necessary mitigation measures to reduce impacts to air quality? • Prevent or mitigate adverse air quality impacts from construction and industry activities? • Support compliance with, or improvement beyond, national air quality standards across the District?

2.3 Plan vision and objectives

2.3.1 The draft Bradford Local Plan contains a vision and strategic objectives. The vision is set out below.

Bradford Local Plan Vision

By 2043 the Bradford District will be a much sought after and desirable location where people want to live and visit, do business, shop and spend their leisure and recreation time. It will be greener, lower carbon, better connected and with diverse safe neighbourhoods and inclusive communities contributing to the economic and cultural vibrancy of the district.

The Regional City of Bradford will be a central focus of regeneration, physical transformation, homes and jobs capitalising on new transport infrastructure to revitalise the reshaped and expanded City Centre and continue to attract new economic, educational and cultural investment. The large and medium towns of Keighley, Bingley, Baildon and Ilkley will be key areas of services and facilities outside of the City, with levels of housing delivery aimed at promoting sustainable growth whilst developing and retaining the individual character and environmental quality together with heritage assets of these distinctive towns.

Bradford's smaller towns and villages will continue to play a vital role as locations for local services and facilities, while contributing to appropriate levels of housing to meet needs.

Growth will be people-focused, ensuring a diverse range of housing and employment, opportunities for increased active travel and access to quality green spaces to support healthy communities. New development will be delivered in a way that mitigates against and adapts to the causes and impacts of climate change. It will have taken account of flood risk, be energy efficient and feature high-quality design with a focus upon place-making. Physical and social infrastructure will be delivered of the right scale and at the right time to support the effective integration of new development and communities.

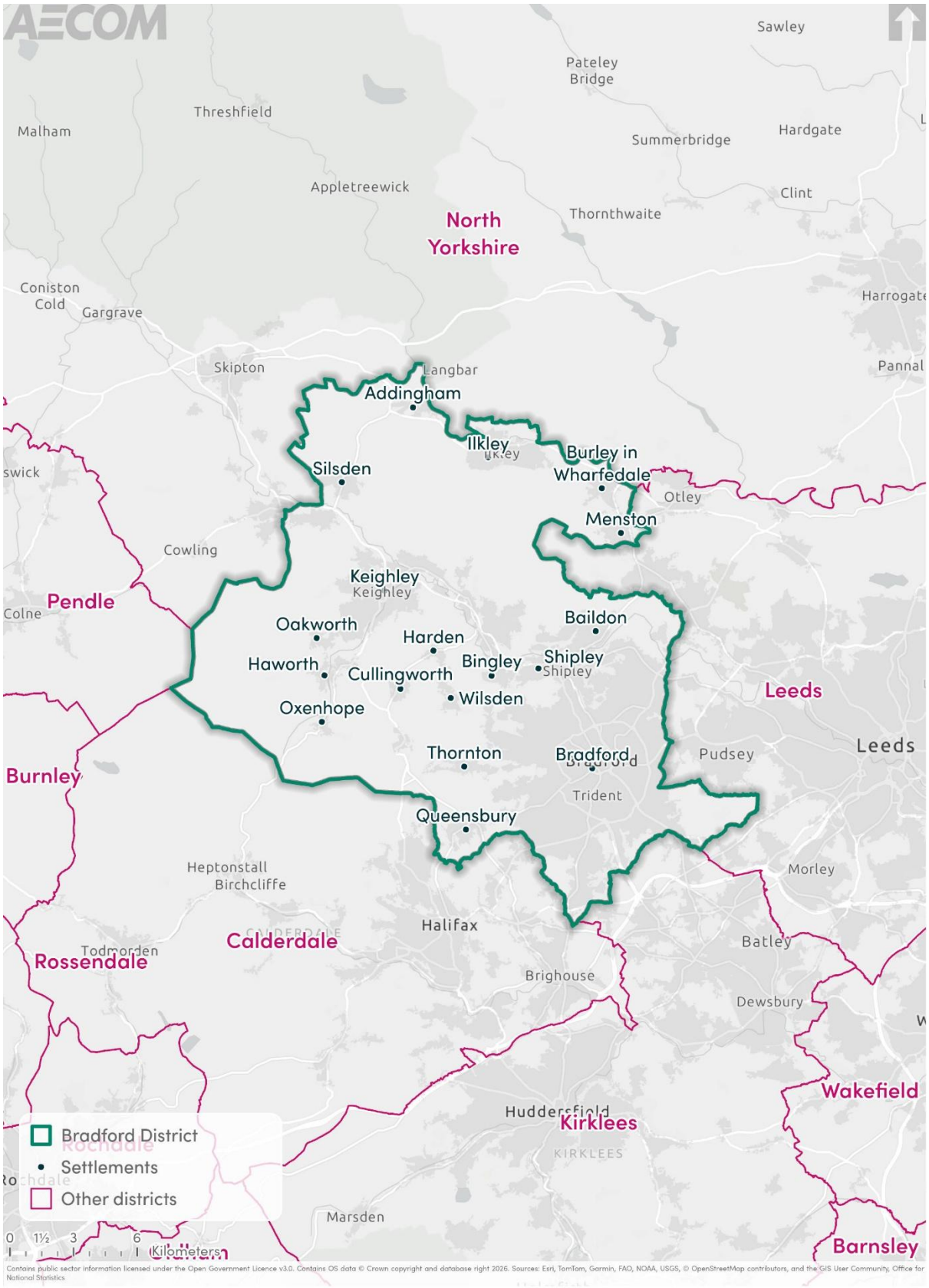
The District's unique and distinctive landscapes, heritage, and biodiversity assets continue to play a vital role in making great places that encapsulates what makes Bradford District so special.

Strategic objectives

2.3.2 The vision is supported by 20 strategic objectives, which are specific, achievable, attainable and realistic in what they seek to achieve to fulfil the vision over the plan period. These strategic objectives are titled as follows:

- Strategic Objective 1: Supporting Transformation and Regeneration in Bradford District through new homes.
- Strategic Objective 2: Delivering the District's Development Needs.
- Strategic Objective 3: Efficient use of land.
- Strategic Objective 4: Delivering Infrastructure for Growth.
- Strategic Objective 5: Quality Design and Placemaking.
- Strategic Objective 6: Access to Secure and Affordable Housing.
- Strategic Objective 7: Supporting a Growing Economy.
- Strategic Objective 8: Vibrant City, Town and District Centres.
- Strategic Objective 9: Increasing Skill Levels.
- Strategic Objective 10: Delivering Improved Transport Connectivity and Sustainable Transport Networks.
- Strategic Objective 11: Conserving and Enhancing the Historic Environment.
- Strategic Objective 12: Tackling the Impacts of Climate Change.
- Strategic Objective 13: Enhancing the Green and Blue Infrastructure Network.
- Strategic Objective 14: Protecting and Enhancing the Natural Environment.
- Strategic Objective 15: Safeguarding Our Natural Resources.
- Strategic Objective 16: Delivering Healthy Places and Communities.
- Strategic Objective 17: Enhancing Environmental Quality.
- Strategic Objective 18: Supporting Tourism and the Visitor Economy.
- Strategic Objective 19: Ensuring Minerals Supply.
- Strategic Objective 20: Sustainable Waste Management.

2.3.3 The Plan area is illustrated on **Figure 2.1** overleaf and will cover the whole of the City of Bradford Metropolitan District area.



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Figure 2.1: The Local Plan area

Part 1: What has plan-making involved?

3. Introduction (to Part 1)

3.1 Background

3.1.1 This part of the IA Report summarises the key stages of Local Plan preparation undertaken by City of Bradford Metropolitan District Council to date, and explains how the IA has informed the development of the Bradford Local Plan throughout the plan-making process.

3.1.2 The Bradford Local Plan has been informed through consultation and engagement exercises, together with ongoing technical studies and evidence gathering. The IA has been undertaken iteratively alongside plan preparation to ensure that sustainability considerations inform the development of the spatial strategy, policies and site allocations.

4. Regulation 18 Stage IA work

4.1 Introduction

4.1.1 The Sustainability Appraisal (SA) supporting the emerging Regulation 19 Local Plan forms part of an ongoing and iterative assessment process that has accompanied preparation of the Bradford Local Plan over a number of years. Sustainability considerations have been integrated into plan-making throughout the preparation of the Local Plan and have informed the development, testing and refinement of strategic growth options, planning policies and site allocations.

4.1.2 The most recent published stage of this process prior to preparation of the current Sustainability Appraisal was the sustainability-appraisal-and-strategic-environmental-assessment-interim-report, prepared by Arcadis Consulting (UK) Limited and published alongside consultation on the Regulation 18 Draft Local Plan in February 2021.

4.1.3 The Interim SA Report was prepared to support consultation on the Draft Local Plan and incorporated the requirements of Strategic Environmental Assessment (SEA). The report was expressly identified as an interim stage within an ongoing process of assessment and plan preparation, recognising that further iterations of both the Local Plan and Sustainability Appraisal would be required following consultation and subsequent plan development.

4.1.4 The purpose of this chapter is not to repeat the detailed findings contained within the Interim SA Report and its supporting appendices. Rather, it provides a summary of:

- the Sustainability Appraisal work undertaken at Regulation 18 stage;
- the reasonable alternatives considered;
- a summary of the key findings of the appraisal;
- consultation undertaken on the Interim SA Report and key issues raised;
- how appraisal findings and consultation responses informed subsequent work; and
- the relationship between the Regulation 18 appraisal and the current Sustainability Appraisal supporting Regulation 19 consultation.

4.1.5 This chapter therefore provides a bridge between the earlier and current stages of assessment and demonstrates how sustainability considerations have continued to inform the evolution of the Local Plan.

4.2 Scoping

4.2.1 The Sustainability Appraisal process commenced with preparation of a Scoping Report. The Scoping stage was initially undertaken during 2018 and 2019 and represented the first formal stage of the SA/SEA process. The purpose of the Scoping Report was to establish the context, objectives, baseline information and assessment framework that would subsequently be used to appraise the emerging Local Plan.

4.2.2 The Scoping Report was subject to consultation between January and February 2019 before being updated and finalised in April 2019.

4.2.3 Drawing on the baseline review and key sustainability issues identified through scoping, a Sustainability Appraisal Framework was developed comprising nineteen sustainability objectives. The framework covered environmental, social and economic themes and provided the basis for assessing the draft plan and options throughout preparation of the Regulation 18 Local Plan.

4.2.4 All strategic policies, thematic policies, Strategic Urban Extensions and site allocations considered through the Regulation 18 Local Plan process were assessed against this framework. The framework also provided the basis for comparison of options and identification of mitigation measures where adverse effects were identified.

4.3 Development of Alternatives

4.3.1 The Interim SA Report explored and appraised a range of options in relation to the following factors:

- the overall plan period;
- housing delivery requirements;
- the spatial distribution of growth;
- strategic policies;
- thematic policies;
- Strategic Urban Extensions;
- housing and employment site allocations; and
- other development management policy approaches.

4.3.2 The appraisals were undertaken using a consistent methodology based upon the nineteen SA objectives. At this stage, the appraisals adopted a precautionary approach to uncertainty. Where information was incomplete or outcomes could not be predicted with confidence (which is not unusual at early stages of plan making), the appraisal generally assumed a worst-case scenario in order to ensure potentially significant adverse effects were identified and considered during plan preparation.

4.4 Assessment of alternatives to inform Strategy Development

4.4.1 The Interim SA assessed a broad range of alternatives relating to the overall strategy, policy framework and proposed development allocations. This included consideration of alternatives relating to housing growth, the distribution of development, settlement hierarchy, Green Belt release, Strategic Urban Extensions (SUEs), development management policies and site allocations. The assessment was undertaken using a consistent methodology to enable comparison between the preferred approach and alternative options. Each component is discussed in turn below.

4.5 Strategic Context and Spatial Strategy Alternatives

4.5.1 In developing the Regulation 18 Local Plan, the Council drew upon earlier strategic planning work undertaken through preparation of the adopted Core Strategy. The Interim SA Report acknowledges that a range of strategic spatial alternatives had previously been examined through the Core Strategy process and had informed the broad spatial framework subsequently carried forward into the Local Plan.

4.5.2 These alternatives included:

- a settlement hierarchy-led option focused on the Regional City, Principal Towns and Local Service Centres;
- continuation of the former Replacement Unitary Development Plan approach;
- a strategy focused on growth points around the sub-regional city;
- a more dispersed growth strategy incorporating Local Growth Centres; and
- the preferred spatial option subsequently reflected within the adopted Core Strategy.

4.5.3 The Interim SA Report explained that the Regulation 18 Local Plan was not seeking to fundamentally revisit the strategic spatial framework established through the Core Strategy process. Nevertheless, the appraisal process reviewed the extent to which the emerging Local Plan strategy remained consistent with sustainability objectives and whether further refinements were appropriate.

Housing Growth Alternatives

4.5.4 One of the most important areas of assessment related to draft Policy SP8 (Housing Growth), which established the overall housing requirement and spatial distribution of housing growth across the District.

4.5.5 A range of alternatives were considered in relation to both the scale and distribution of housing growth. These included options which would:

- apply the Government's urban uplift to the local housing need figure;
- provide for a lower level of housing growth than the baseline housing need figure;
- avoid the release of Green Belt land;
- avoid Green Belt release through significantly increased development densities;
- distribute development in accordance with population proportions;
- retain the distribution used within the adopted Core Strategy; and
- disperse a greater proportion of growth towards lower-tier settlements within the settlement hierarchy.

4.5.6 The assessment recognised that these approaches generated substantially different sustainability implications. Alternatives involving higher levels of growth were considered capable of delivering increased housing provision and affordable housing but were also likely to require substantially greater releases of Green Belt and greenfield land (with associated impacts on environmental factors such as soil and landscape). Conversely, alternatives involving lower levels of housing provision or avoidance of Green Belt release were considered likely to reduce environmental impacts but would result in a significantly reduced contribution towards identified housing needs and affordable housing delivery (with subsequent consequences for socio economic objectives).

4.5.7 The preferred approach sought to balance the delivery of housing needs with the minimisation of environmental impacts by directing a substantial proportion of growth towards the Regional City and regeneration areas whilst limiting the scale of Green Belt release required to accommodate development needs. The appraisal identified that this approach would still give rise to environmental effects associated with housing growth, but considered these to represent a more sustainable balance than a number of the alternative approaches assessed.

Strategic Policy Alternatives

4.5.8 The Regulation 18 Sustainability Appraisal also examined options for a wide range of strategic policies. Whilst these were not reasonable alternatives in the strictest sense (in that they do not present alternatives to the 'Plan'), it was considered useful to test the options against the SA framework to assist in the selection of preferred policy approaches / wording.

4.5.9 The assessments generally found that the preferred policy framework provided stronger support for sustainable development objectives than the majority of alternatives, particularly in relation to climate change, health, accessibility, biodiversity protection and sustainable transport outcomes.

Strategic Urban Extension Assessment

4.5.10 The Regulation 18 Sustainability Appraisal included a dedicated assessment of Strategic Urban Extensions (SUEs). The purpose of this work was to understand the relative sustainability performance of potential strategic growth locations capable of accommodating substantial volumes of housing development and associated infrastructure.

4.5.11 Six Strategic Urban Extension options were assessed in varying degrees of configuration:

- Allerton;
- Clayton Heights;
- South Bierley;
- Holme Wood;
- West of Cross Hill; and
- Thackley.

4.5.12 The appraisal considered each option against the full Sustainability Appraisal Framework and identified a range of common sustainability issues associated with strategic-scale development.

4.5.13 The assessment found that all SUEs would result in significant housing delivery benefits and make an important contribution towards meeting Bradford's housing needs. The larger sites, particularly Holme Wood and Thackley, were identified as making particularly substantial contributions in this regard. The appraisal also identified positive effects relating to employment opportunities, accessibility to services, social cohesion and economic growth.

4.5.14 However, the assessment also highlighted significant environmental trade-offs. All SUEs involved substantial development on greenfield land and therefore had the potential to give rise to adverse effects relating to:

- loss of undeveloped land;
- agricultural land resources;
- biodiversity;
- ecological connectivity;
- landscape character;
- Green Belt;
- cultural heritage; and
- greenhouse gas emissions.

4.5.15 The assessment recognised that the scale of some developments could also create opportunities for mitigation and enhancement which may not be achievable through smaller development sites. This included opportunities for strategic green infrastructure provision, habitat creation, sustainable drainage infrastructure and integrated transport measures.

4.5.16 The appraisal therefore sought to understand the balance of positive and negative effects associated with each option rather than identify a single preferred location based solely on environmental or economic performance. Indeed, it was acknowledged that the overall strategy would likely need to consist of multiple components of growth, including the consideration of SUEs.

Individual Site Assessments

4.5.17 Alongside assessment of strategic options and policies, the Council undertook a comprehensive assessment of preferred and alternative site allocations across the District.

4.5.18 The Interim SA Report explained that individual sites were assessed against all nineteen Sustainability Appraisal objectives using a structured methodology supported by GIS analysis and a common assessment framework.

4.5.19 The purpose of the appraisal was not to determine which sites should be allocated in isolation, but to provide evidence regarding the sustainability performance of potential development locations and to inform decisions regarding site selection and reasonable alternatives. The assessment therefore formed part of a wider evidence base that also included deliverability, infrastructure, planning and environmental considerations.

4.5.20 The appraisal identified that many sites offered strong accessibility credentials and opportunities to support housing and employment needs. However, it also highlighted potential effects associated with greenfield development, biodiversity constraints, flood risk, landscape impacts, heritage sensitivities and air quality considerations. In many cases, the significance of effects was dependent on the detailed form of future development and the extent to which mitigation measures could be incorporated through planning policies and subsequent development proposals.

4.5.21 Moving towards Reg19 it was considered unnecessary to further duplicate site assessment work through the Integrated Appraisal. The Council's site assessment methodology incorporates a comprehensive appraisal of environmental, social and economic considerations relevant to site allocation decisions. Rather than duplicating this work, the Integrated Appraisal draws upon the evidence generated through the site assessment process. Table 4.1 below demonstrates the relationship between the site assessment themes and the corresponding IA topics:

4.5.22 To be clear, the Integrated Appraisal did not undertake further separate detailed assessments of individual site constraints or opportunities where these had already been examined through the Council's site assessment process. Instead, the IA uses the findings of these assessments as a key evidence source when considering the sustainability implications of spatial options, allocations and policy approaches. This ensures that sustainability considerations informed plan-making whilst avoiding duplication of assessment work.

4.5.23 The site-assessment process informed the selection, extent and policy requirements of the employment and housing allocations (alongside strategic level assessments). It identified constraints, which have been reflected, where relevant, through site boundaries, net developable areas and allocation-specific requirements. The principal residual effects of the selected portfolio are considered in the appraisal of the plan ‘as a whole’. The individual site proformas should therefore be read alongside, but do not form a substitute for, the plan-level and cumulative appraisal presented in this report.

Table 4.1 Relationship between Site Assessment topics and the IA

Site Assessment Topics	Relevant IA Themes/Objectives
Accessibility to services, facilities, employment areas and public transport	Connectivity (Transport) Connectivity (Sustainable Community Growth) Health & Wellbeing Communities, Population and Housing (Equality) Economy & Employment

Site Assessment Topics	Relevant IA Themes/Objectives
Highway impacts and transport capacity	Connectivity (Transport) Climate and Resources (Air Quality) Climate and Resources (Addressing Causes of Climate Change)
Flood risk and drainage constraints	Climate and Resources (Climate Change Resilience) Climate and Resources (Water) Health & Wellbeing
Water quality, watercourses and Source Protection Zones	Climate and Resources (Water) Climate and Resources (Climate Change Resilience)
Ecological designations, habitats, protected species, biodiversity net gain opportunities	Natural Environment (Biodiversity) Climate and Resources (Climate Change Resilience) Connectivity (Sustainable Community Growth)
Landscape character, visual effects, settlement form and Green Belt considerations	Natural Environment (Landscape) Climate and Resources (Climate Change Resilience) Communities, Population and Housing (Equality) Connectivity (Sustainable Community Growth)
Heritage assets, archaeology, conservation areas and settings	Built Environment (Heritage) Natural Environment (Landscape)
Agricultural land quality, contaminated land and mineral safeguarding	Climate and Resources (Land, Soil, Minerals and Waste)
Air quality, noise and environmental constraints	Climate and Resources (Air Quality) Health & Wellbeing
Open space, recreation, green infrastructure and public rights of way	Health & Wellbeing Connectivity (Sustainable Community Growth) Natural Environment (Biodiversity)

Site Assessment Topics	Relevant IA Themes/Objectives
	Climate and Resources (Climate Change Resilience
Housing suitability, deliverability and site capacity	Communities, Population and Housing (Housing)
Employment suitability, regeneration opportunities and economic potential	Economy & Employment
Infrastructure capacity and service provision	Connectivity (Sustainable Community Growth) Communities, Population and Housing (Housing) Economy & Employment Health & Wellbeing Communities, Population and Housing (Equalities)
Deliverability, viability and availability considerations	Communities, Population and Housing (Housing) Economy & Employment

4.6 Appraisal of the Draft Plan

4.6.1 The overall findings of the SA were that the Draft Local Plan had the potential to deliver significant positive social and economic benefits across the District whilst also creating a range of environmental challenges associated with accommodating growth.

4.6.2 At a strategic level, the appraisal identified significant positive effects relating to:

- housing delivery;
- affordable housing provision;
- employment growth;
- economic development;
- investment and regeneration;
- access to services;
- community infrastructure;
- education and skills; and
- health and wellbeing.

4.6.3 The appraisal also concluded that the emerging policy framework included a range of measures capable of supporting sustainable development objectives, particularly through policies relating to climate change, green infrastructure, biodiversity enhancement, environmental protection, health and sustainable transport. Nevertheless, the assessment identified a number of environmental risks associated with the scale of growth planned across the District. These included:

- development of greenfield land;
- loss of agricultural land;
- impacts on biodiversity and ecological networks;
- impacts on landscape character;
- effects upon heritage assets and their settings;
- increased travel demand;
- increased greenhouse gas emissions;
- pressure on air quality; and
- increased demand upon environmental resources.

4.6.4 The appraisal concluded that significant potential adverse effects could be avoided, reduced or mitigated through implementation of the policy framework, site-specific mitigation measures and ongoing refinement of the Local Plan through subsequent stages of plan preparation. However, there was uncertainty at this stage of assessment.

4.7 Consultation at Regulation 18 Stage

4.7.1 Consultation on the Regulation 18 Draft Local Plan and accompanying Interim Sustainability Appraisal was undertaken between February and March 2021. The Sustainability Appraisal was published alongside the Draft Local Plan, and consultees were invited to comment on the proposed planning strategy and the methodology, findings and conclusions of IA work.

4.7.2 Following consultation, representations on the Sustainability Appraisal were reviewed to identify issues relating to the evidence base, methodology and assessment findings. Several recurring themes emerged, which informed subsequent stages of plan preparation and Sustainability Appraisal work. More detailed comments and responses are provided in **Appendix A**.

Environmental baseline and evidence

4.7.3 A number of consultees highlighted the importance of maintaining an up-to-date environmental evidence base and requested amendments or additional information relating to biodiversity, ecological networks, agricultural land, flood risk, groundwater, water quality and environmental constraints. Comments were also received recommending updates to plans, programmes and legislation referenced within the appraisal, including emerging environmental legislation and updated environmental management plans.

4.7.4 These comments reinforced the need for the Sustainability Appraisal evidence base to remain consistent with evolving environmental evidence and policy requirements and informed subsequent updates to the Scope of the SA (with the latest updates being presented in a full scoping report update in August 2026).

Assessment methodology

4.7.5 Representations raised questions regarding aspects of the appraisal methodology, including the structure of the SA framework, the treatment of uncertainty and the way in which significance conclusions were reached for site assessments and strategic growth options. Particular attention was drawn to the relationship between identified effects and proposed mitigation measures, with some respondents seeking greater transparency regarding how mitigation had been factored into the appraisal process.

4.7.6 The consultation responses prompted further consideration of the role of mitigation within subsequent appraisal work and informed a review of elements of the methodology and assessment framework. It is also important to note however, that high level appraisals at early stages of plan making regularly result in uncertainties, and there is a need to take a ‘policy off’ approach to ensure consistency in the appraisal process.

Assessment of reasonable alternatives

4.7.7 A recurring theme within the consultation responses related to the identification, presentation and assessment of reasonable alternatives. Consultees sought additional explanation regarding the basis on which alternative sites, strategic growth options and policy approaches had been considered, together with the rationale supporting the selection of preferred approaches.

4.7.8 A number of responses emphasised the importance of demonstrating a clear link between appraisal findings and plan-making decisions, particularly where alternative growth options or site allocations had been discounted. These comments reinforced the importance of maintaining a clear audit trail between assessment findings and subsequent strategic decisions. These are important observations that have been factored into subsequent stages of assessment rather than making changes to previous appraisal work (given that the evidence base and structure of reasonable alternatives changed as the plan evolved).

Strategic Urban Extensions and site assessment

4.7.9 Several representations focused on the assessment of Strategic Urban Extensions (SUEs) and the appraisal of individual sites. Concerns were raised regarding Green Belt release, biodiversity impacts, landscape effects, heritage impacts, transport implications and the assumptions underpinning some assessment conclusions. Consultees also requested further explanation regarding the relative performance of strategic growth options and the extent to which site-level mitigation could affect assessment outcomes.

4.7.10 Subsequent review of these responses helped inform ongoing consideration of strategic growth options, site assessment methodologies and the role of appraisal in supporting site selection decisions. A key take away from this stage though is that individual sites and SUEs should not be treated as reasonable alternatives to the Plan, rather they are components of broader strategies and should be treated as such as the plan progresses and strategic alternatives are articulated.

Strategic assessment and growth options

4.7.11 Consultation responses also highlighted the importance of understanding the cumulative implications of growth and the relative sustainability performance of alternative growth strategies. Subsequent review work recognised that appraisal could continue to evolve beyond comparison of individual sites and provide greater support to strategic decision-making through assessment of wider growth scenarios and combinations of development options (which has been a focus of subsequent SA work at Reg19 stage).

4.8 Influence on Subsequent Plan Preparation

4.8.1 The Regulation 18 Sustainability Appraisal formed an important component of the evidence base supporting the continuing preparation of the Local Plan. Through the assessment of strategic alternatives, policies and development options, it helped identify environmental constraints, opportunities for mitigation and enhancement, evidence gaps, and matters requiring further consideration as the Plan evolved.

4.8.2 The findings informed subsequent plan development by:

- identifying environmental constraints requiring further investigation;
- highlighting opportunities for mitigation and enhancement;
- informing the review of strategic growth options and site choices;
- identifying areas where additional evidence was required; and
- helping shape policy revisions intended to avoid, minimise or manage adverse effects.

4.8.3 Consultation responses on the Interim SA Report also contributed to this process, highlighting areas were additional analysis, clarification or methodological refinement would be beneficial. These issues were subsequently considered alongside updated evidence relating to housing land supply, infrastructure provision, environmental constraints, transport impacts and growth options.

4.8.4 As plan preparation progressed, there was increasing recognition that the key strategic choices facing the Council related to alternative approaches for accommodating growth across the District as a whole, rather than simply comparing the performance of individual sites or strategic locations. This informed subsequent appraisal work and contributed to a greater emphasis on the assessment of realistic growth scenarios and combinations of development options.

4.9 Key Changes Since Regulation 18 and Relationship with the Regulation 19 Stage

4.9.1 The Regulation 18 Interim Sustainability Appraisal was prepared using the evidence, development options and planning context available at the time of consultation in early 2021. Since then, the Local Plan has continued to evolve through consultation, additional technical evidence gathering, further consideration of growth options and site allocations, and ongoing plan preparation.

4.9.2 The wider plan-making context has also changed significantly, including updates to national planning policy, changes to housing need calculations, evolving approaches to Green Belt assessment, and wider Government policy relating to housing delivery. The supporting evidence base has similarly developed, resulting in changes to development commitments, housing and employment land requirements, infrastructure considerations and the supply of potential development sites.

4.9.3 Review of the Regulation 18 assessment, consultation responses and subsequent technical work also identified opportunities to refine the Sustainability Appraisal process, including updating and streamlining the assessment framework and placing greater emphasis on the appraisal of strategic growth scenarios and development strategies capable of informing key plan-making decisions (rather than a focus on individual components of growth).

4.9.4 The Regulation 18 Interim Sustainability Appraisal nevertheless remains an important component of the Local Plan evidence base and SEA ‘story’. It demonstrates how sustainability considerations were integrated into plan preparation at an early stage, including the identification and assessment of reasonable alternatives and the evaluation of potential effects associated with strategic policies, growth options and site allocations.

4.9.5 However, the Interim SA Report was not intended to provide a final assessment of the Local Plan. Rather, it represented an interim stage within an ongoing process and anticipated that both the Local Plan and Sustainability Appraisal would evolve as further evidence emerged and plan preparation progressed.

4.9.6 The current Sustainability Appraisal therefore provides a comprehensive reassessment of the current Local Plan, reflecting the changes outlined above and focusing on the reasonable alternatives relevant to the current stage of plan preparation. Whilst building directly upon the work undertaken at Regulation 18 stage, it also reflects subsequent learning regarding the role of Sustainability Appraisal in supporting strategic decision-making, particularly through the assessment of realistic growth scenarios and combinations of development capable of delivering the Plan's objectives.

4.9.7 In terms of methodology, (as mentioned earlier) it was considered useful to update the scope of the IA to support Reg19 stage assessment work. This led to the production of a new scoping report (**see Appendix B),** which explains how the integration of SA/SEA, EqIA and HIA has been approached at this stage.

5. Reg19 Stage: Consideration of Reasonable Alternatives

5.1 Introduction

5.1.1 The SEA Regulations[4] require the IA Report to identify, describe and evaluate the likely significant effects of implementing the Plan and any reasonable alternatives, taking account of the objectives and geographical scope of the Plan. The identification of reasonable alternatives has formed an iterative part of the IA process and has been undertaken alongside the preparation of the Bradford Local Plan (as discussed in section 4).

5.1.2 There is a need for plan-makers to determine which elements of a Local Plan present strategic 'choices' and where alternative approaches could reasonably be taken to address key planning issues. The identification of reasonable alternatives at this stage has therefore focused on those aspects of the Plan where there is meaningful scope for alternative approaches and where materially different environmental, social or economic effects could arise.

5.1.3 The identification of reasonable alternatives has been undertaken proportionately rather than identifying alternatives for every aspect of the Plan (which is a proportionate established practice that has been tested through numerous examinations). In determining what constituted a reasonable alternative, the Council has considered a range of factors:

- The Plan objectives
- Previous site assessment work and screening outcomes
- Deliverability
- The need to create meaningfully different options
- The need to be proportionate and recognise the strategic nature of assessment.

5.1.4 Through this process, consideration has principally been given to whether reasonable alternatives exist in relation to:

- Employment growth and spatial strategy
- Housing growth and spatial strategy

[4] Environmental Assessment of Plans and Programmes Regulations 2004.

5.2 Employment growth and spatial strategy

5.2.1 The Employment Growth Paper[5] and Employment Land Review (ELR),[6] including its 2026 Addendum,[7] provide the basis for exploring the scale and distribution of employment growth proposed through the Local Plan. The evidence identifies a requirement for 110.5ha of employment land over the plan period. The Local Plan seeks to meet this identified requirement.

5.2.2 This evidence also informs the consideration of reasonable alternatives to the scale of employment growth. During plan preparation, it was concluded that planning for a lower level of employment growth would not represent a reasonable alternative because it would not meet the identified need and would conflict with the Plan's objectives for economic growth and investment. Equally, planning for a higher level of employment growth was not considered reasonable because there is no identified quantitative need for additional employment land beyond that established through the evidence base, while opportunities for further growth are constrained by the availability of suitable land capable of meeting identified qualitative requirements. The evidence therefore provides a relatively clear basis for the proposed scale of employment growth, with no materially different level of provision identified as a reasonable alternative.

5.2.3 The spatial distribution of employment development has similarly been informed by the availability and suitability of land across the District. There is limited scope to accommodate the identified requirement through the existing employment land supply alone. There is a shortfall against the identified need which means that meeting the requirement relies on a combination of existing employment areas, previously developed and greenfield opportunities, and a limited number of strategic locations involving Green Belt release. The limited supply of suitable employment land therefore constrains the range of locations through which the identified requirement could reasonably be accommodated and, in turn, the scope for alternative spatial distributions at a strategic level.

5.2.4 The spatial distribution is further informed by the established pattern of economic activity and market demand across the district, alongside the characteristics, availability and potential role of individual development sites. The evidence indicates that employment demand is not evenly distributed, with recent industrial take-up concentrated in Bradford, particularly to the south-east of Bradford City Centre, and in Keighley, while office take-up has been focused on Bradford City Centre, Shipley, Keighley and Ilkley. A materially different distribution would therefore risk directing employment growth towards locations with less established market demand or employment functions, potentially reducing the deliverability and attractiveness of the overall employment land supply.

[5] Edge Economics (2024) Employment Growth Paper.
[6] Edge Economics (2024) Employment Land Review.
[7] Edge Economics (2026) Employment Land Review: Addendum 2026.

5.2.5 The strategic locations identified through the evidence also have particular characteristics that limit the scope for a materially different distribution. Esholt (Site MDS2), Holme Wood (Site E57) and Nufarm (Site E157) perform distinct roles within the employment land supply and provide opportunities that cannot readily be replicated through smaller urban sites elsewhere in the district. Esholt provides an opportunity for major economic transformation and higher-value sectors, while Nufarm benefits from its proximity to the M606 and M62 and the potential to accommodate a range of employment unit sizes. Holme Wood provides an opportunity to combine employment growth with wider regeneration, infrastructure investment and improved access to employment in an area with significant levels of deprivation. Distributing this growth differently would therefore not simply involve relocating equivalent employment land, as the strategic sites have particular characteristics and opportunities that are not readily interchangeable. It is also worth noting that there are already several non-strategic site allocations (on non-Green Belt land), which contribute to local needs.

5.2.6 There is limited scope to replace strategic sites through further concentration of employment growth within existing employment areas. The evidence identifies the importance of retaining and improving existing employment land, alongside opportunities for regeneration and more efficient use of land within established employment areas. Smaller and micro employment sites are particularly important within Bradford's urban areas, providing accessible and relatively affordable workspace. These sites perform a complementary function to the larger strategic locations. A spatial alternative based predominantly on either a small number of strategic locations or existing employment areas would therefore not provide the same range, scale and choice of employment opportunities across the district.

5.2.7 Overall, no reasonable alternatives have been identified in relation to either the scale or spatial distribution of employment growth. A lower level of provision would not respond to the identified employment land requirement or the Plan's objectives for economic growth, while a higher level is not supported by the evidence of need. In terms of spatial distribution, the limited supply of suitable employment land, established patterns of market demand, and the distinct roles of strategic and existing employment locations limit the scope for a materially different distribution that could meet the identified requirement while maintaining an appropriate range and choice of sites. Nonetheless, an exercise of appraising individual employment site options was undertaken through the Council's site assessment and selection methodology.

5.2.8 The Council assessed the available employment site options through the employment site-selection process, including their suitability, availability, deliverability and sustainability effects (at Reg 18 stage separate site appraisals were also undertaken against the SA framework). Together, this work did not identify an alternative combination of suitable and deliverable sites capable of meeting the same quantitative and qualitative needs with a materially different spatial distribution. The alternative approaches considered were therefore screened out because they would not realistically achieve the employment objectives of the Plan, rather than because they performed less favourably than the preferred strategy.

5.3 Housing growth and spatial strategy

Introduction

5.3.1 The IA process has informed the preparation of the Bradford Local Plan throughout its development, providing a mechanism for identifying, assessing and comparing different options as the plan has evolved. Earlier stages of plan preparation were characterised by consideration and appraisal of a range of options for individual components of the plan, alongside high-level growth options (as discussed in the previous chapter).

5.3.2 The assessment undertaken at those earlier stages was intended to establish an appropriate spatial framework for accommodating future development and to inform the evolution of a suitable spatial strategy. Through successive stages of evidence gathering, consultation and assessment, the Council has identified an emerging preferred approach to meeting housing, employment and infrastructure needs whilst balancing environmental, social and economic considerations.

5.3.3 The focus of the reasonable alternatives considered at Regulation 19 necessarily differs from that applied at earlier stages. Previous stages considered high-level approaches to growth and a wide range of individual site options. That work informed the development of the spatial strategy, the detailed assessment of sites and the identification of the proposed allocation portfolio. The findings remain relevant and form part of the overall IA audit trail.

5.3.4 It is not proportionate or meaningful to revisit high-level strategic alternatives previously assessed, as these have already informed the development of the proposed plan. It is also unhelpful to compare sites or broad locations on an individual basis, as there is a need to bring forward a significant portfolio of sites to meet identified needs.

5.3.5 Instead, the reasonable alternatives considered at Regulation 19 focus on alternative versions of the plan ‘as a whole’. They examine whether different combinations of sites could provide a reasonable alternative to the proposed allocation strategy whilst continuing to meet (or exceed) identified development needs. The alternatives therefore represent variations in the composition, scale and distribution of development that are relevant at this stage of plan making. This ensures that the assessment remains focused on realistic and deliverable alternatives that could reasonably be progressed in place of the proposed plan.

Development of Regulation 19 Reasonable Alternatives

5.3.6 The reasonable alternatives identified at Regulation 19 have been informed by the evidence base assembled during preparation of the Local Plan. This includes the Strategic Housing Land Availability Assessment (SHLAA/SLA), site assessment work, Green Belt and Grey Belt assessments, settlement and urban capacity studies, landscape and green infrastructure studies; infrastructure evidence and consultation responses received throughout previous stages of plan preparation.

5.3.7 The process of identifying reasonable alternatives has been influenced by several key factors.

5.3.8 First, it is important to understand housing needs. The Standard Method need figure (2025 and 2026 update) has been calculated at 1,845 for year 1 of the plan and 1,872 per annum for the remaining 17 years of the plan period equating to a total of 33,669 units. This has narrowed down significantly the level of housing need / housing requirement to be met. Though previous stages debated and assessed significant variations in argued 'need' through demographic forecasting models, this is no longer appropriate.

5.3.9 There is now a significantly greater understanding of the deliverability, suitability and availability of potential development sites across the District to contribute towards meeting this housing need. Earlier stages of plan preparation considered a wide range of potential opportunities; however, subsequent technical assessment has established a clearer understanding of which sites are capable of contributing towards development requirements, which can be considered as 'constant' elements of supply, and which should be treated as 'variable' for the purpose of the RAs appraisal.

5.3.10 Secondly, changes to national planning policy and the emergence of Grey Belt as a distinct planning consideration have created additional opportunities for alternative development strategies. This has necessitated consideration of whether development needs could be met through greater reliance on Grey Belt land and alternative approaches to Green Belt release. However, for plan-making, this approach also needs to be considered within the context of exceptional circumstances for the release of Green Belt land and understanding the limits to development options within settlements, including brownfield and greenfield sites prior to consideration of the release of land from the Green Belt.

5.3.11 Thirdly, evidence work has progressed and completed on strategic areas of work on such matters as landscape character and impacts, green and blue infrastructure and flood risk, and Green Belt assessment which often set the 'framework of constraints' to local plan-making.

5.3.12 Fourthly, the advanced stage of the plan means that reasonable alternatives must be realistic. The alternatives therefore draw exclusively from the pool of sites that have been subject to detailed assessment, and which could reasonably contribute towards the delivery of the Local Plan. This ensures that the alternatives considered are capable of implementation in a broad sense and provide a genuine alternative to the proposed strategy.

5.3.13 Finally, the alternatives seek to explore different approaches to both the scale and distribution of development. Collectively, they test the implications of directing growth towards urban brownfield sites, increasing development within existing settlements, expanding settlements through urban edge locations, or relying more heavily on Green Belt and/or Grey Belt land.

5.3.14 The resulting alternatives can therefore be grouped into three broad themes:

- Urban Intensification Alternatives;
- Urban Edge Alternatives; and
- Grey Belt Alternatives.

5.3.15 Together, these provide a range of realistic alternative approaches against which the proposed plan can be assessed.

Constant elements of supply

5.3.16 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**

5.3.17 The total 'constant element' that applies to each option is therefore 22,140 dwellings. The breakdown of additional sites / supply that would be required to meet identified needs for each of the reasonable alternatives is set out in table 5.1 below (in addition Appendix C includes a figure for each alternative that maps the variable sites involved). A brief description of each alternative is provided below.

Variable sites

5.3.18 The site pools associated with some of the reasonable alternatives have a greater total capacity than would be required to meet the identified housing requirement. This is intentional. Defining a fixed alternative portfolio at Regulation 19 would have required the Council to select a second preferred basket of sites and could have predetermined the composition of the alternative before its sustainability effects had been considered. The alternatives therefore identify the wider pool of assessed sites capable of supporting each spatial approach, rather than prescribing a particular combination of sites.

5.3.19 In appraising these alternatives, account has been taken of the fact that only sufficient sites would need to be selected from the relevant pool to achieve the stated capacity. The assessment therefore considers both the overall characteristics of the wider site pool and the scope to avoid or reduce adverse effects through the selection of more sustainable or less constrained sites. Where adverse effects are associated with only part of the site pool, the appraisal recognises that these effects would not necessarily arise to their full extent. Conversely, where constraints are widespread across the pool, or are inherent to the spatial approach being tested, the potential effects have been reflected more clearly in the appraisal conclusion.

5.3.20 This approach avoids assuming that all sites within an alternative would be developed and prevents the appraisal from overstating effects by assessing substantially more development than would be required. It also avoids selecting sites solely to improve the apparent performance of an alternative. The appraisal instead identifies the broad range, distribution and significance of effects that could arise from implementing each strategy, together with the degree of flexibility available to avoid or mitigate adverse effects through subsequent site selection.

5.3.21 Some alternatives comprise a more limited and clearly defined group of sites. This reflects the nature of those strategies and the available land capable of supporting them. In these cases, all, or substantially all, of the identified sites would be required to achieve the stated capacity and implement the alternative. The appraisal has therefore assessed those specific sites rather than a wider pool from which a smaller portfolio could be selected.

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

5.3.22 The emerging Preferred Option represents the Council's proposed strategy for the Local Plan. It focuses most growth within existing settlement boundaries/urban areas of 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. Whilst smaller rural settlements are proposed to accommodate proportionate level of housing growth according to their function, characteristics and environmental constraints (tier 3); or lower levels of housing growth to sustain rural economies and housing choice (tier 4) in line with the settlement hierarchy.

5.3.23 Included in this option was a Regeneration Area Allowance (RAA) of 6,000 dwellings; based on historic housing delivery rates and expected future trends within such areas and detailed within the Housing Technical Paper 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)

5.3.24 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 (35,300)

5.3.25 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 6000 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)

5.3.26 This option focuses additional growth around the edge of the Bradford urban area on greenfield sites, via the release of Grey Belt/Green Belt land.

5.3.27 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)

5.3.28 This option spreads urban edge growth (including via the release of Grey Belt/Green Belt land), 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)

5.3.29 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, including via release of Grey Belt/Green Belt land. 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)

5.3.30 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. 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.

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

5.3.31 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.

Table 5.1: Breakdown of supply for each reasonable alternative

RA	Description	Additional Capacity	Total Capacity Including Constants	Housing need Balance 33,669 *18years*
	Total constants	-	22,140	-
	Total including regeneration allowance 6000	-	28,140	-
Preferred option	Allocated sites outside settlement boundaries forming the Regulation 19 Plan (regen areas included)	7,039	35,179	+1,510
RA1A	Urban Intensification through Previously Developed Land (including regeneration allowance)	2,407	30,547	-3,122
RA1B	Urban Intensification through Additional Urban Greenfield and Mixed Sites (including regeneration allowance)	7,160	35,300	+1,601
RA2A	Urban Edge Growth focused only around the Regional City (Including regeneration allowance)	8,905	37,045	+3,376
RA2B	Urban Edge Growth spread across Regional City and Settlements (Including regeneration allowance)	8,905 (27,942 full site pool capacity)	37,045	+3,376
RA2C	Urban Edge Growth spread across Regional City and Settlements (Not relying on regeneration allowance)	14,905 (27,942 full site pool capacity)	37,045	+3,376
RA3A	Large scale Grey Belt release (Including regeneration allowance)	8,905 (22,110 full site pool capacity)	37,045	+3,376
RA3B	Large scale Grey Belt release (no reliance on regeneration allowance required)	14,905	37,045	+3,376

Unreasonable alternatives

5.3.32 In developing the Regulation 19 Local Plan strategy, the Council also reviewed a range of further alternative approaches to the scale and distribution of growth. Several options were identified as not representing reasonable alternatives for further consideration because they either failed to meet identified development needs, lacked sufficient land capacity, relied on unrealistic assumptions regarding delivery, or would give rise to significant adverse sustainability impacts.

Lower than Standard Method Housing Requirement

5.3.33 The Council considered whether a housing requirement below the Standard Method could be justified at this stage. Previous work identified a demographic-led scenario of approximately 1,582 dwellings per annum and other lower growth options. These approaches were not taken forward as they would fail to address identified housing needs and affordability pressures and would be inconsistent with the objective of significantly boosting housing supply. Furthermore, emerging evidence suggested that sufficient opportunities existed within the land supply to plan positively for identified needs.

Higher growth through sustainable urban extensions alone

5.3.34 The Council explored whether higher housing requirements could be accommodated primarily through an expanded programme of Sustainable Urban Extensions (SUEs) around the Regional City. However, available evidence indicated that even a substantial increase in SUE provision would not generate sufficient capacity to accommodate the additional growth within this plan period. Furthermore, the options considered were highly theoretical in nature rather than based upon extensive packages of promoted land. The option would also further concentrate development within Bradford and would still require the release of additional sites elsewhere in the District (as addressed through other alternatives such as RA2A, RA2B, RA2C). Consequently, this approach was discounted as an unreasonable alternative.

Higher Growth through dispersal alone

5.3.35 An alternative approach involving greater dispersal of development to lower-tier settlements was also considered. Assessment of the available site supply demonstrated that there was insufficient capacity within the pool of rejected and alternative sites to accommodate higher growth levels without continued reliance on allocations within and around the Regional City. As a result, a dispersal only led strategy was not considered a realistic means of meeting development requirements and was not progressed further. It is also worth noting that alternatives RA2B, RA2C, RA3A and RA3B already represent dispersal approaches (but those options are more realistic with regards to how much growth is driven down the settlement hierarchy).

Strategic new settlement and major urban extensions

5.3.36 The Council also examined a number of strategic-scale growth options, including major urban extensions and theoretical new settlement proposals around Bradford, Keighley, Esholt and Holme Wood.

5.3.37 While such options could theoretically contribute substantial levels of housing growth, many of the sites had not been promoted through the plan-making process, were not considered deliverable within the plan period, and could be associated with significant environmental effects. On this basis, the Council concluded that these options did not represent reasonable alternatives for further appraisal at this stage.

Comprehensive Green Belt and Grey Belt Release

5.3.38 This alternative represents the broadest possible land release scenario, incorporating all assessed Green Belt and Grey Belt sites. It is considered unreasonable as the extent of supply is very significantly beyond the identified need. There are no significant 'push factors' such as abnormally high economic growth levels / ambitions to further enhance the need for housing levels so much higher than identified needs.

Green Belt-Led Strategy

5.3.39 This option considers the implications of relying on all assessed Green Belt opportunities, excluding the Grey Belt-specific approach. The alternative is not considered to be reasonable. Although Green Belt release has formed an important consideration throughout the preparation of the Local Plan and remains a realistic means of accommodating growth in some locations, an approach that wholly relies upon Green Belt would be contrary to national policy and would significantly exceed identified needs when combined with grey belt opportunities.

6. Appraisal of reasonable alternatives (Housing Strategy)

6.1 Introduction

6.1.1 This section presents the appraisal of the reasonable alternatives identified and considered during the plan-making process, as described in Chapters 4 and 5. The appraisal considers the likely effects and relative performance of each alternative, helping to inform the development of the Bradford Local Plan and the Council's consideration of the strategic choices available.

6.2 Approach and methodology

6.2.1 The reasonable alternatives have been appraised against the IA framework established through the scoping process. For each IA topic, the appraisal considers the likely effects associated with the scale and spatial distribution of growth under each alternative, including potential cumulative effects arising from the combination of sites assumed.

6.2.2 In determining the significance of effects, professional judgement has been applied having regard to the characteristics of effects identified in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 and relevant IA guidance. Consideration has been given, where relevant, to the magnitude, duration, frequency, likelihood, permanence and timescale of effects, together with the potential for cumulative and synergistic effects.

6.2.3 The appraisal has been informed by the baseline information, trends and key sustainability issues identified through the IA Scoping Report, alongside GIS analysis, supporting technical evidence and professional observations. The characteristics of effects are discussed proportionately and where relevant to determining the significance of effects. Effects are recorded using the significance scale established for the IA below, ranging from neutral to major positive or major negative, with uncertainty identified where appropriate.

Likely effect	Colour and symbol
Major positive	+++
Moderate positive	++
Minor positive	+
Neutral	0
Major negative	---
Moderate negative	--
Minor negative	-
Uncertainty	?

6.2.4 Each IA theme presented below begins with a discussion of 'constant' sites (see chapter 6 for further detail on what these consist of). These are sites which are included across every option. To avoid repetition and to ensure the focus of discussion under each option is on the 'variable' sites (i.e. differentiating sites), these constants are discussed upfront for each theme.

Assumptions

6.2.5 The reasonable alternatives have been appraised on a consistent basis to enable a like-for-like comparison of their likely effects. The appraisal focuses primarily on the inherent characteristics of the sites and the scale and spatial distribution of growth associated with each alternative.

6.2.6 The appraisal has been undertaken on a 'policy-off' basis, whereby the emerging Local Plan policies have not generally been taken into account in determining the significance of effects. This enables the appraisal to distinguish more clearly between the effects arising from the alternatives themselves, rather than assuming that potential effects would be mitigated through the subsequent application of Plan policies. Having said this, if national policy provides clear guidelines for development regardless of local policy, this has been factored into the appraisals, but (again) on a consistent basis across alternatives.

6.2.7 Similarly, site-specific mitigation or enhancement measures have not been assumed unless these are established requirements or supported by the evidence available for the appraisal. This provides a consistent and precautionary basis for comparing the alternatives. The absence of assumed mitigation does not mean that identified effects are fixed or incapable of being mitigated through the Local Plan, development management or detailed scheme design. Therefore, the appraisal findings should be interpreted with this in mind.

6.2.8 For appraisal purposes, the alternatives have been defined at a broadly comparable scale of growth to the Preferred Option, rather than at their maximum theoretical capacity. This ensures that the assessment focuses primarily on the reasonable differing spatial distribution of development, whilst also allowing consideration of the implications of accommodating a modest level of additional growth above minimum needs (to explore the impacts of additional flexibility).

6.2.9 Some alternatives (RA2B, RA2C, RA3A and RA3B) are represented by a wider pool of sites than would be required to meet housing needs. In these cases, the appraisal assumes that only sufficient sites would be selected to achieve the stated capacity and does not assume that all sites within the pool would be developed. Where effects are inherent to the spatial strategy, or common across the site pool, these are reflected directly in the appraisal. Where effects relate only to particular sites, account is taken of the realistic scope to avoid or reduce those effects through site selection. Any resulting uncertainty is reflected in the appraisal conclusions.

6.2.10 Other alternatives comprise a more limited and clearly defined set of sites because the relevant spatial strategy provides only a narrow range of realistic options and all, or substantially all, of those sites would be required. This provides greater certainty regarding likely effects, although all alternatives have been assessed on the same overall basis.

Technical difficulties

6.2.11 As required by the SEA Regulations, the assessment has been undertaken at a strategic level and is therefore subject to a number of inherent limitations. Given the plan-led nature of the assessment, detailed information regarding the precise form, design, layout, phasing and mitigation measures associated with future development proposals is not available.

6.2.12 Consequently, the assessment can identify the likely direction and magnitude of effects but cannot predict with certainty the detailed impacts that may arise at the project level.

6.2.13 The findings are also influenced by the availability, quality and consistency of baseline data. Whilst the most up-to-date and robust evidence available at the time of assessment has been utilised, some datasets are updated at different intervals and may vary in age, coverage and resolution.

6.2.14 For example, accessibility and service provision assessments are based primarily on spatial proximity measures, whereas wider considerations such as the capacity of existing facilities, future investment, service enhancements and changing travel behaviours are more difficult to quantify consistently at a strategic scale. In many cases, information relating to infrastructure capacity and planned service improvements is dynamic and subject to change over the plan period.

6.2.15 A further challenge relates to the need to assess alternatives on a fair, consistent and comparable basis. Sites promoted through the plan-making process are often supported by differing levels of evidence and technical work, reflecting their varying stages of promotion, assessment and maturity. Whilst some sites may benefit from more detailed surveys, masterplanning or technical evidence, others may be supported by only limited information. The assessment therefore adopts a proportionate and consistent approach across all reasonable alternatives, seeking to avoid assumptions that could either advantage or disadvantage particular options. This necessitates stepping back from project-specific detail and focusing instead on those characteristics that can be assessed consistently across the entire pool of sites and spatial options.

6.2.16 Furthermore, sustainability appraisal necessarily involves the application of professional judgement when interpreting evidence and assessing the significance of likely effects. Whilst a consistent methodology has been applied throughout, a degree of subjectivity is unavoidable, particularly where effects are uncertain, evidence is incomplete, or multiple sustainability considerations interact.

6.2.17 Finally, the evidence base underpinning the Local Plan is continually evolving, with new information, technical studies, monitoring data and policy changes becoming available throughout the plan-making process. The appraisal therefore represents a snapshot of the evidence at the time it was undertaken. Whilst every effort has been made to ensure that conclusions are robust and proportionate, findings may require refinement as additional evidence emerges and as proposals evolve through subsequent stages of plan preparation and implementation.

6.3 Communities, population and housing

IA objectives

- **Housing (1a)** To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups.
- **Equality (2a)** To support equality and diversity, whilst promoting social cohesion, encouraging participation and improving the quality of life (particularly in deprived neighbourhoods).

Implications of the constants

Housing

6.3.1 Development within the urban areas of the Bradford district through the 'constant sites' will contribute substantially towards housing needs and will bring positive effects in relation to housing development. It is possible that some sites within the urban environment of Bradford may not deliver the housing types and tenures required to meet some community needs, as they may be smaller sites that cannot accommodate a greater mix of development. However, further greenfield and mixed-use sites are allocated that will help to diversify supply in terms of the size, type and location of housing.

Equality

6.3.2 The constant sites are anticipated to deliver growth within and around some of the more deprived communities in the district, with more than 20 sites overlapping with an LSOA with an overall rank below 100 (within the 2% most deprived neighbourhoods nationally), and a further 20+ sites overlapping with an LSOA with an overall rank below 500 (within the 0.5% most deprived neighbourhoods nationally). The most deprived areas in the district include inner-city areas in Bradford such as Manningham and areas within Keighley. The distribution of the constant sites therefore provides opportunities for investment and regeneration within areas experiencing higher levels of deprivation, including through the delivery of new homes, affordable housing, employment opportunities and supporting infrastructure. A proportion of the constant growth is also directed to smaller settlements, helping to support incremental growth in a wider range of settlements across the district without overwhelming services.

Preferred Option

Housing

6.3.3 With regards to housing development, growth through the emerging preferred option is expected to deliver 35,179 homes over the plan period. The greatest proportion of growth would be focused within the City of Bradford, including Shipley, with further growth distributed across the principal towns, including Keighley, Ilkley, Bingley, Baildon, Queensbury and Silsden, and a lower level of growth within villages including Addingham and Wilsden.

6.3.4 There would be a further focus on delivering housing growth through the regeneration areas identified in Bradford Centre, Keighley, Shipley and Holme Wood. This is anticipated to contribute positively towards housing across the district, by increasing housing delivery to meet identified local needs. Additionally, the variety in site sizes and locations is anticipated to contribute well towards housing by providing greater housing type and tenure choices, which may help meet the needs of younger people, older persons and smaller households. However, whilst growth is distributed across the district, the majority of the sites are located within and around Bradford itself – which may not offer as much choice across the wider area (than a more dispersed approach). It is also worth noting that a sizeable proportion of homes are expected to come forward in broad locations, which comes with an element of uncertainty, given that specific deliverable sites have not been identified. As a result, whilst **major positive effects** are predicted, these are uncertain.

Equality

6.3.5 With regards to equality, none of the residual sites overlap with LSOAs that have an overall deprivation rank below 500, but two overlap with an LSOA that has an overall deprivation rank below 100. These two sites are: Ned Lane, Holmewood (H979) and Harper Gate Farm, Ned Lane (H997). As such, residual growth is largely focused on less deprived areas within Bradford. However, it is recognised that this can still bring forward benefits for the wider community. For example, new infrastructure coming forward linked to growth could potentially support existing residents as well as new residents. It is also noted that development within or adjacent to deprived areas does not automatically result in positive equality outcomes and will depend upon delivery.

6.3.6 Distributed growth across the district through this option (which also includes the regeneration areas identified within Bradford centre, Keighley, and Shipley) would likely lead to positive effects in relation to equality, by providing a wider choice of housing in settlements across the area (allowing people to remain in the area should they wish to as well as attracting new residents). Additionally, the growth around Bradford itself involves green belt opportunities, which could allow for new sustainable communities to come forward. Moreover, the level of growth proposed through this option is unlikely to overwhelm existing services. Overall, a **major positive effect** is predicted, as this is a balanced approach that brings benefits to a range of communities. A degree of uncertainty exists given that the success of regeneration efforts is dependent upon delivery.

RA1A – Urban intensification through previously developed land

6.3.7 In relation to housing development, growth through this approach could deliver 30,547 homes over the plan period. The majority of growth would be focused within the city of Bradford itself, especially within the regeneration areas located in the centre, with additional growth largely focused within the settlement of Keighley (including a regeneration area). Additionally, there is a further regeneration area identified in Shipley. Urban intensification and the development of urban sites within Bradford, Keighley and Shipley (including within the identified regeneration areas) is likely to contribute positively towards housing across the district.

6.3.8 This is due to increasing housing delivery flexibility, which helps to meet the identified need in the district. Development through this approach could deliver a level of growth in the urban areas that contributes to greater housing choice, including apartments and specialist accommodation, which may help meet the needs of younger people, older persons and smaller households. However, it is noted that higher-density housing development may not deliver against the housing types and tenures needed across the wider demographic, such as housing for families or accommodation for older residents and people with disabilities. Furthermore, delivering growth largely within Bradford itself, as well as Keighley and Shipley, may not adequately meet the housing needs of smaller settlements and other urban areas in the district. It is also worth noting that this option does not demonstrate that needs will be met in full, and this also includes reliance on further windfall sites in broad locations. As such, only **moderate positive effects** are predicted.

Equality

6.3.9 In relation to equality, eight of the residual sites overlap with an LSOA that has an overall deprivation rank below 500, meaning that they are within the 2% most deprived neighbourhoods nationally. Additionally, nine sites overlap with an LSOA that has an overall deprivation rank below 100, meaning that they are within the 0.5% most deprived neighbourhoods nationally. This approach to growth is likely to increase population densities within Bradford, Shipley and Keighley (through individual sites and regeneration areas). This could further support the viability of local services and facilities and improve access for people across different demographic groups and those with protected characteristics; however, increased population could also place additional pressure on existing services and facilities, particularly where new provision does not come forward alongside development. It could also contribute towards encouraging a greater mix of demographics and ethnicities into these settlements, by increasing development, opportunities, and access. Furthermore, growth could help to reduce concentrations of deprivation and crime – as development and investment into these settlements could focus on more disadvantaged neighbourhoods and could bring forward infrastructure and opportunities linked to education and employment (though it is recognised that this is dependent on the development design taken forward).

6.3.10 However, it is noted that an approach to growth involving urban intensification may lead to an exacerbation of inequalities where accessibility to key services and facilities is reduced. Inequalities relating to access could also be exacerbated given that growth is not distributed across the district but is largely focused within three settlements that are already well serviced. Furthermore, developing vacant, derelict or underutilised land within these settlements could result in gentrification effects and the subsequent displacement of lower-income residents if property values increase and existing renters are not protected.

6.3.11 It is also noted that this option delivers the lowest level of growth and is therefore less likely to deliver wide-ranging opportunities associated with growth, which often have beneficial impacts for equality. On the other hand, this option is less likely to overwhelm existing services.

6.3.12 Overall, this option provides a strong opportunity to support deprived communities and regeneration. However, benefits depend heavily on successful regeneration outcomes and housing needs are not met in full. Risks include displacement, gentrification and continued affordability pressures. Therefore, only **moderate positive effects** are predicted.

RA1B – Urban intensification through additional urban sites

Housing

6.3.13 In relation to housing development, growth through this approach could deliver 35,300 homes over the plan period. Through this approach, the majority of growth will be focused within Bradford city centre, Shipley, and Keighley (through the regeneration areas), and the outskirts of the Bradford city centre, with a greater level of development on the 'outskirts' of Keighley (though still within the existing settlement boundaries). Similarly to Option RA1A, growth through this approach is anticipated to perform positively due to increasing housing delivery and planning to meet identified needs in the district. Housing delivery would be higher than RA1A due to the inclusion of greenfield and mixed-use land, which is typically less constrained than previously developed sites. As such, it is likely to provide greater housing choice in the urban areas in relation to types and tenures that could be offered when compared to Option RA1A. However, similarly it is noted that higher-density housing development within settlement boundaries may not deliver against the full range of housing types and tenures needed. Nonetheless, this option does seek to meet identified needs in full and performs better than RA1A. **Major positive effects** are predicted, but (as per the preferred option) uncertainty is recorded to reflect the reliance on large amounts of windfall in the regeneration areas.

Equality

6.3.14 In relation to equality, eight sites overlap with an LSOA that has an overall deprivation rank below 500, meaning that they are within the 2% most deprived neighbourhoods nationally. Additionally, five sites overlap with an LSOA that has an overall deprivation rank below 100, meaning that they are within the 0.5% most deprived neighbourhoods nationally. As such, growth through this option would have a slightly reduced potential to address inequalities when compared to Option RA1A. This is because less development would be focused within or adjacent to the most deprived neighbourhoods and as such, associated investment and infrastructure may not be as well placed to support disadvantaged members of the community. However, it is noted that development within or adjacent to deprived areas does not automatically result in positive equality outcomes.

6.3.15 Growth through this approach would be greater overall, and distributed more widely across the district than under Option RA1A (though it is noted that there would still be large levels of development through the regeneration areas in Bradford centre, Keighley and Shipley). This could help support the viability of and access to local services and facilities across different demographic groups and protected characteristics over a greater area. It could also contribute towards more vibrant communities across the district. Moreover, the level of growth proposed through this option is unlikely to overwhelm existing services.

6.3.16 The loss of informal open space and greenspaces across urban areas could be detrimental to equality though, particularly where this reduces access to such services compared to peripheral communities in the more affluent settlements. Overall, this results in a less positive picture with only **moderate positive effects** predicted, despite an increase in overall housing provision.

RA2A – Urban edge expansion around Bradford

Housing

6.3.17 In relation to housing development, this approach identifies a supply of 37,045 homes over the plan period (which 'exceeds' the identified needs). Through this approach, growth will be mostly focused within and on the edge of the city of Bradford itself (with regeneration areas also located in Shipley and Keighley). Development of sites within the city would likely contribute positively towards housing by increasing stock and delivering housing in the more sustainable locations (when considering access to services and infrastructure). However, development solely around the urban edges of Bradford is less likely to meet the housing needs identified in individual settlements (albeit recognising that a proportion of growth is still dispersed). Nevertheless, this option provides a significant amount of growth on greenfield sites that are likely to be deliverable across the plan period. Overall, **major positive effects** are predicted. Though there is still a reliance on regeneration areas for a proportion of growth, this option performs better than the preferred option and RA1A due to a higher assumed supply position on attractive sites. Nonetheless, a degree of uncertainty remains.

Equality

6.3.18 In relation to equality, only four sites overlap with an LSOA that has an overall deprivation rank below 100, meaning that they are within the 0.5% most deprived neighbourhoods nationally. This demonstrates that residual growth through this approach would largely focus on less deprived neighbourhoods on the edge of Bradford city itself. As such, it may not contribute as much towards helping to reduce concentrations of deprivation and crime across the wider district. It could also exacerbate inequalities between settlements and communities as more investment would likely come forward at the edges of the regional city as opposed to across other settlements more widely or within Bradford itself (though it ought to be remembered that significant growth is proposed here through the regeneration areas and constant elements of supply). However, it is noted that development within or adjacent to deprived areas does not automatically result in positive equality outcomes.

6.3.19 Though residual growth would be focused on the edge of Bradford, this could still likely provide good access to services and facilities associated with the regional city (which contains significant areas of deprivation). This could help to reduce inequalities experienced by different demographics linked to accessibility to jobs, affordable homes and social infrastructure. Furthermore, development through clusters of sites could deliver additional community infrastructure on site. As such, development through this approach has a likelihood of supporting a more mixed and more vibrant community and encouraging a greater mix of housing choice around Bradford itself.

6.3.20 Overall, this option provides a good mix of housing delivery and accessibility benefits. Sites adjacent to Bradford may provide opportunities for deprived communities to benefit, though outcomes remain uncertain and dependent on implementation. **Major positive effects** are predicted, with an element of uncertainty.

RA2B – Urban edge expansion across the District

Housing

6.3.21 Growth through this approach would be anticipated to deliver up to 37,045 homes over the plan period. Residual growth would be focused on the urban edges of settlements across Bradford, as well as across regeneration areas identified in Bradford centre, Shipley, and Keighley. As such, growth would likely contribute positively towards housing by increasing stock and meeting identified needs of the district, and deliver housing in sustainable locations when considering access to local infrastructure and services. It is recognised that there would be a selection of sites under this option, and not all would need to come forward for development. This provides some flexibility for less constrained sites to come forward and is likely more positive in terms of deliverability and viability. Dispersing growth across several settlements also provides a wider choice of locations and likely types of housing. **Major positive effects** are predicted. Whilst this option would provide a higher level of growth and increased flexibility of supply, there would still be an assumption that almost 6000 homes come forward in regeneration areas, which still leaves a degree of uncertainty whether needs would definitely be met in full over the plan period.

Equality

6.3.22 In relation to equality, only four sites overlap with an LSOA that has an overall deprivation rank below 100 – meaning that they are within the 0.5% most deprived neighbourhoods nationally. This demonstrates that growth through this approach would largely focus on less deprived neighbourhoods within the urban edges of settlements across the Bradford district, and the more deprived sites will be located within the urban edge of Bradford city itself (similar to Option RA2A). As such, approaching development in this way may not contribute as much towards helping to reduce concentrations of deprivation and crime across the district where issues are most prevalent. However, it is noted that development within or adjacent to deprived areas does not automatically result in positive equality outcomes. Likewise, developing urban edge sites across the district will likely allow for good access to local services and facilities, which could help to reduce inequalities experienced by different demographics linked to accessibility to key infrastructure.

6.3.23 Furthermore, development through clusters of sites (such as those to the north / north-west of Keighley, and those at Addingham) could deliver additional community infrastructure, depending on development delivery, layout and design. It is also noted that growth through the regeneration areas located in Bradford, Keighley and Shipley would allow for good access to services and facilities located in the settlement centres.

6.3.24 As such, development through this approach has a greater likelihood of supporting a more mixed and more vibrant community and encouraging a greater mix of demographics and ethnicities across the district.

6.3.25 Overall, **major positive effects** are concluded as likely for equality under this option. There are benefits from spreading a proportionate amount of growth to a wider range of settlements (and communities). Though there is less focus on deprived locations for the residual growth, there remain ample opportunities to deliver regeneration benefits through other elements of supply. The scale of growth involved through residual growth could put more homes in less accessible locations (with secondary impacts on equality), but the benefits of development ought to outweigh the negatives.

RA2C - Urban edge expansion without reliance on Regeneration Areas

Housing

6.3.26 In relation to housing development, growth through this approach would be anticipated to deliver up to 37,045 homes over the plan period. Through this approach, residual growth would be focused on the urban edges of settlements across Bradford. As such, growth would likely contribute positively towards housing by increasing stock and meeting the local identified need of the district, and delivering housing in sustainable locations when considering access to local infrastructure and facilities. It is recognised that there would be a selection of sites under this option, and not all would need to come forward for development. This provides some flexibility for less constrained sites to come forward and is likely more positive in terms of deliverability and viability. Dispersing growth across several settlements also provides a wider choice of locations and likely types of housing. **Major positive effects** are predicted.

Equality

6.3.27 In relation to equality, only four sites overlap with an LSOA that has an overall deprivation rank below 100 – meaning that they are within the 0.5% most deprived neighbourhoods nationally. This demonstrates that residual growth through this approach would largely focus on less deprived neighbourhoods within the urban edges of settlements across the Bradford district, and the more deprived sites will be located within the urban edge of Bradford city itself (similar to Option RA2A). As such, approaching development in this way may not contribute as much towards helping to reduce concentrations of deprivation and crime across the district. However, it is noted that development within or adjacent to deprived areas does not automatically result in positive equality outcomes.

6.3.28 Likewise, developing urban edge sites across the district will likely allow for good access to local services and facilities, which could help to reduce inequalities experienced by different demographics linked to accessibility to key infrastructure. Furthermore, development through clusters of sites (such as those to the north / north-west of Riddlesden, and those at Addingham) could deliver additional community infrastructure, depending on development design. As such, development through this approach has a greater likelihood of supporting a more mixed and more vibrant community and encouraging a greater mix of housing choice to suit different community needs across the district.

6.3.29 However, it should be noted that a greater amount of residual growth would be directed to urban edge sites in less deprived areas (with poorer access to services). It is possible that services could be placed under pressure in these locations. It is also worth noting that a less direct focus on regeneration areas could see some redirection of attention away from the most deprived locations in the district in the short to medium term. Additionally, it is noted that the main focus of the approach is dispersed growth, rather than seeking to address equalities where they are most profound. Therefore, **major positive effects** are predicted to reflect significant increases in housing in a range of locations.

RA3A: Grey Belt-led strategy

Housing

6.3.30 In relation to housing development, maximising growth through this approach could deliver up to 37,045 homes over the plan period. However, there is an assumption under this option that not all sites would need to be identified for allocation, and there would still *be a reliance on regeneration areas to contribute towards the supply. Grey belt sites have been identified across a range of settlements, and would therefore provide a range of site options for inclusion under such a strategy. As discussed above for the urban edge options, there would be an ability to choose sites that are more sustainable, deliverable and viable, and thus **major positive effects** are likely to arise. This option would rely less on larger urban extensions and would provide a wide portfolio of sites, which makes it more attractive from a housing perspective compared to the preceding options. However, a reliance on Regeneration Areas to fulfil needs still leaves an element of uncertainty.

Equality

6.3.31 In relation to equality, only four sites overlap with an LSOA that has an overall deprivation rank below 100 – meaning that they are within the 0.5% most deprived neighbourhoods nationally. This demonstrates that residual growth through this approach would largely focus on less deprived neighbourhoods across the Bradford district, and as such may not contribute as much towards helping to reduce concentrations of deprivation and crime. However, it is noted that development within or adjacent to deprived areas does not automatically result in positive equality outcomes.

6.3.32 Likewise, developing grey belt sites across the district is likely to distribute growth as opposed to concentrating development in certain areas. Whilst grey belt development could result in growth coming forward in more isolated areas, the majority of sites are adjacent to existing settlement boundaries, and as such would likely contribute to ensuring equality linked to access to opportunities and infrastructure. Additionally, the development of clusters of sites (such as those around Queensbury) could deliver additional community infrastructure, depending on development design. Furthermore, growth through this option would include the regeneration areas located in Bradford, Keighley and Shipley, which would allow for good access to services and facilities located in the settlement centres. As such, development through this approach has a greater likelihood of supporting a wider range of community needs across the district.

6.3.33 Overall, this approach performs similarly to RA2B (**major positive effects)**, though could see some more isolated locations involved. It is also noted that the main focus of the approach to residual growth is dispersed, rather than focusing on areas where deprivation is most pronounced; which may result in reduced equality benefits when compared to other options. A level of uncertainty is noted for the same reasons as other options relying on substantial growth at the Regeneration Areas.

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

Housing

6.3.34 In relation to housing development, maximising growth through this approach could deliver up to 37,045 homes over the plan period. However, there is an assumption under this option that not all sites would need to be identified for allocation. Grey belt sites have been identified across a range of settlements, and would therefore provide a range of site options for inclusion under such a strategy. As discussed above for the urban edge options, there would be an ability to choose sites that are more sustainable, deliverable and viable, and thus **major positive effects** are likely to arise. This option would rely less on larger urban extensions and would provide a wide portfolio of sites without reliance on broad locations, which makes it more attractive from a housing perspective.

Equality

6.3.35 In relation to equality, only four sites overlap with an LSOA that has an overall deprivation rank below 100 – meaning that they are within the 0.5% most deprived neighbourhoods nationally. This demonstrates that residual growth through this approach would largely focus on less deprived neighbourhoods across the Bradford district, and as such may not contribute as much towards helping to reduce concentrations of deprivation and crime. However, it is noted that development within or adjacent to deprived areas does not automatically result in positive equality outcomes.

6.3.36 Likewise, developing grey belt sites across the district is likely to distribute growth as opposed to concentrating development in certain areas. Whilst grey belt development could result in growth coming forward in more isolated areas, the majority of sites are adjacent to existing settlement boundaries, and as such would likely contribute to ensuring equality linked to access to opportunities and infrastructure. Additionally, the development of clusters of sites (such as those around Queensbury) could deliver additional community infrastructure, depending on development design. As such, development through this approach has a greater likelihood of supporting a wider range of communities across the district.

6.3.37 Whilst **major positive effects** are predicted to reflect significant increases in housing and social infrastructure in a range of locations, it is important to recognise this approach could detract from regeneration area activity in the short to medium term, and some isolated locations could be involved. Additionally, it is also noted that the main focus of the approach is dispersed growth, rather than achieving balanced equality outcomes, which may result in reduced equality benefits when compared to other options. Therefore, these options do not perform the best, despite delivering the most growth.

Comparison of options (Housing)

6.3.38 All options are expected to result in positive effects through the delivery of significant levels of housing growth. However, differences arise in the extent to which they meet housing needs in full, provide flexibility and certainty of delivery, and offer a wider choice of housing locations and types across the district.

6.3.39 RA1A performs least favourably, being the only option assessed as having a moderate positive effect. Whilst it supports regeneration objectives, it delivers the lowest level of housing, does not demonstrate that needs would be met in full, and relies heavily on previously developed land and windfall assumptions.

6.3.40 The Preferred Option performs more positively due to its higher level of housing delivery, broader distribution of growth and wider mix of site types. However, a significant proportion of supply is expected to come forward through regeneration areas, creating some uncertainty regarding delivery.

6.3.41 RA1B seeks to meet identified needs in full and includes a greater range of urban sites, including greenfield and mixed-use opportunities, which are likely to offer greater flexibility and housing choice compared to RA1A.

6.3.42 RA2A performs better than the urban-focused options due to its higher level of housing provision and greater reliance on greenfield urban-edge sites that are likely to be more deliverable. However, residual growth is concentrated primarily around Bradford, providing less geographic choice than some alternatives.

6.3.43 RA2B and RA2C perform particularly well, combining a substantial housing supply with a wider distribution of growth across the district. This increases flexibility and the potential to provide a broader range of housing locations and types. RA2C performs slightly more favourably, as it is less reliant on regeneration areas to meet housing needs.

6.3.44 The Grey Belt options (RA3A and RA3B) also perform strongly. Both provide a substantial and flexible supply of homes across a range of settlements, allowing greater scope to prioritise sustainable, deliverable and viable sites. RA3B is marginally more favourable, as it combines these benefits without reliance on regeneration areas to meet housing requirements, providing the greatest confidence in delivery.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
+++ ?	++	+++ ?	+++ ?	+++ ?	+++	+++ ?	+++

Comparison of options (Equalities)

6.3.45 All options are anticipated to result in positive effects in relation to equalities reflecting the substantial level of growth that is common across each strategy through commitments, windfalls and the constant site supply. Consequently, all options would support housing delivery, affordable housing provision and housing choice across the district, with knock-on benefits in terms of improving access to affordable homes to a range of communities and bringing investment in social infrastructure, environmental improvements and accessibility.

6.3.46 The principal distinction between options relates to the extent to which the residual growth helps to maximise housing delivery whilst providing opportunities across a range of settlements without overwhelming services. Whilst proximity to deprived communities and regeneration areas remains relevant, these factors are not considered to be the main drivers of performance given that all options include a substantial amount of urban growth and investment through the constant elements of supply. Furthermore, development within or adjacent to deprived communities does not automatically result in positive equality outcomes, which are dependent on design, integration with existing communities, and delivery of supporting infrastructure. In fact, the potential for displacement / gentrification effects and the uncertainty around what can be achieved means that positive effects are caveated with uncertainties for some of the options including a greater focus on regeneration.

6.3.47 The Preferred Option and RA2A perform most strongly, reflecting their ability to balance housing delivery, accessibility, regeneration opportunities and support for a broad range of communities.

6.3.48 RA2B, RA2C, RA3A and RA3B also perform well, although each places relatively greater emphasis on either dispersal of growth or housing delivery than on achieving a focus on the most deprived locations.

6.3.49 RA1B performs positively and delivers substantial housing needs but remains more constrained in its spatial distribution and housing offer and results in the loss of urban greenspace, so performs less well.

6.3.50 RA1A performs least strongly, as its regeneration benefits and focus on deprived urban communities are moderated strongly by its inability to meet housing needs in full. As a result, it provides fewer opportunities to improve housing access and affordability across the district than the alternative strategies.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
+++?	++	++	+++?	+++?	+++?	+++?	+++?

6.4 Health and wellbeing

IA objectives

- **(3a)** 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.
- **(3b)** To create good cultural, leisure and recreation activities available to all.
- **(3c)** To improve safety and security for people and property.

Implications of the constants

6.4.1 Of the constant sites, only 18 sites are over 1.5km walking distance from the nearest GP surgery, and all sites are within 1km walking distance of the nearest open space. As such, the remaining sites are considered to be within reasonable walking distance[8] of key facilities that support health and wellbeing. This is anticipated to positively support health and wellbeing by ensuring health facilities and open space (two key determinants of health and wellbeing) are accessible to residents. Additionally, it is recognised that a large amount of committed growth and site allocations are within existing urban areas across the Bradford district, with the majority of growth being centred on Bradford itself. As such, it is recognised that development within the urban environment could lead to increased pressure on such infrastructure, due to an increase in use. Conversely, it could offer opportunities to improve facilities.

6.4.2 It is also noted that the majority of the constant sites are not located within proximity to a sports centre or pool, but these can be accessed via public transport or car.

Preferred Option

6.4.3 All the additional allocations (bar three sites: Greenhill Barn, Lady Lane (H106); Land east of Harrogate Road, Greengates (H636); and Long Lane (H874)) have good access to a bus stop, and all sites have excellent access to a public right of way. Access to a GP by walking distance is mixed, dependent on the settlement involved, but the peripheral nature of some sites on grey / green belt land means that over half the sites are not within a reasonable walking distance – for example 20 of the sites are between 1.5-5km from the nearest surgery. One site is over 5km from the nearest GP surgery – Otley Road (H577). All sites have good access to open space by walking. Access to public sports facilities and pools is quite poor across the site portfolio, but this is reflective of the wider catchment area that these services tend to have.

[8] An 800m threshold has been used as a proxy for reasonable walking access to a range of day-to-day services and facilities. This reflects established planning guidance, including Manual for Streets, which identifies walkable neighbourhoods as those where a range of facilities can typically be reached within a 10-minute walk (approximately 800m). For services that are less frequently accessed or serve a wider catchment, thresholds of up to 1,200m are also commonly used in planning and accessibility assessments. Whilst accessibility is influenced by factors beyond proximity alone, including route quality, topography and service capacity, the application of consistent distance thresholds provides a proportionate basis for comparing alternatives at a strategic level.

6.4.4 Considering the above, the preferred option is likely to positively support physical and mental health and wellbeing – such as walking and cycling routes, and healthcare infrastructure. This is especially true for sites within the Bradford South West area, as growth would be delivered within proximity to the Westwood Park Diagnostic and Treatment Centre and Community Hospital. Additionally, the preferred option offers the potential to deliver viable, high-quality affordable homes on greenfield sites, which are likely to provide good opportunities to further enhance health and wellbeing.

6.4.5 This is due to the potential for development to incorporate green and open spaces, to facilitate engagement with active lifestyles and contribute towards social infrastructure.

6.4.6 However, it is recognised that several of the grey belt / green belt sites included under the preferred option are opposed by local communities and will inevitably have an effect on wellbeing and identity (this is the same for all options involving such releases though). Additionally, many of the sites identified under this option have the potential to increase pressure on services and facilities within the urban environment – this is especially true for sites in the suburbs of the City of Bradford itself. An increase in the built environment also has the potential to increase the level of noise and air pollution, or increase the number of residents exposed to such pollution, which could adversely impact upon the health of residents.

6.4.7 Overall, this option is predicted to result in **moderate positive effects** in relation to health and wellbeing. This is due to the accessibility of the sites in relation to infrastructure and services that support physical and mental health and wellbeing, and the potential for development to support the delivery of high-quality housing and attractive living environments. However, it is recognised that **minor negative effects** could also arise alongside the positives, due to the potential for growth to place additional pressure on existing health services and facilities, and the release of grey belt and green belt land could negatively impact upon community identity and wellbeing. Increased development may also lead to localised increases in noise, air pollution and traffic-related impacts, potentially affecting the health of existing and future residents.

RA1A – Urban intensification through previously developed land

6.4.8 Delivering residual growth through this approach would focus on sites with a good level of access to healthcare infrastructure – with only three sites being between 1.5km - 5 km from the nearest GP Surgery:

- H462 (Brewery Road, Keighley)
- H41 (West Lane)
- H980 (Albert Terrace, Oakenshaw)
- H988 (Furnace Road, Oakenshaw).

6.4.9 Additionally, only one site is over 5km from the nearest GP surgery - Burley Road (H576).

6.4.10 All sites would also deliver growth within 500m walking distance from the nearest designated open space. However, it is noted that most sites would be 1.4km walking distance from the nearest sports centre or swimming pool.

6.4.11 Approaching growth through urban intensification and the development of previously developed urban sites is likely to further increase population density within the urban areas across Bradford. This would ensure there is good accessibility to healthcare facilities and services for new residents, by positioning growth within closer proximity to existing infrastructure. This is especially relevant for sites located within the city centre environment of Bradford, which would be within closer proximity to health infrastructure including St Lukes Hospital, Bradford Royal Infirmary, and Leeds Road Hospital. It is also relevant for the regeneration areas identified in Keighley, Shipley, and Bradford city centre. Furthermore, given the location of the sites within the urban environment, development through this approach may contribute to making it easier and more efficient to deliver additional infrastructure that supports health and wellbeing across the district – which would benefit new and existing residents. It is also noted that growth through this approach could encourage healthier lifestyles as important infrastructure will likely be more accessible via walking and cycling. Additionally, it is recognised that focusing growth on previously developed sites could help to remove contamination through remediation effects, thus reducing sources of environmental health risk.

6.4.12 However, it is recognised that higher density development linked to urban intensification may increase the level of noise and air pollution, or increase the number of residents exposed to such pollution, which could adversely impact upon the health of some residents. This is especially true for regeneration areas in the settlement centres of Bradford, Shipley and Keighley. Furthermore, growth focused within the urban area is likely to put pressure on existing services and facilities, which may reduce service accessibility where growth outpaces infrastructure provision. This could worsen inequalities, especially in relation to health and education, and especially where investment in infrastructure is not distributed across communities. It is also recognised that this approach to growth will not deliver the full amount of housing needed in the district, which could reduce the level of supporting infrastructure provision that could be delivered through developer contributions (and would also see health effects associated with lack of housing access).

6.4.13 In conclusion, **moderate positive effects** are predicted. This is due to the accessibility of the sites in relation to important infrastructure that supports health and wellbeing. Additionally, there is also potential for the remediation of previously developed land to reduce existing environmental health risks and improve the quality of the local environment. A level of uncertainty is noted, regarding the extent to which new development can deliver health and wellbeing benefits. Furthermore, **minor negative effects** are also concluded for this approach, reflecting its inability to meet housing needs, which could also limit opportunities to secure developer contributions and deliver health and wellbeing infrastructure.

RA1B – Urban intensification through additional urban sites

6.4.14 Delivering residual growth through this approach would focus on sites with a good level of access to existing healthcare infrastructure – with only 22 sites being between 1.5km and 5km from the nearest GP Surgery (including Denholme Road and Tong Park), and one site over 5km from the nearest GP surgery (East End Allotments, Oak Avenue).

6.4.15 All but one site would also deliver growth within 500m walking distance of the nearest designated open space, with Worstead Road, Crossroads Haworth located approximately 1.8-1.9km walking distance from Cross Roads Park. However, it is noted that most sites would be 1.4km walking distance from the nearest sports centre or swimming pool.

6.4.16 Similarly to RA1A, approaching growth through urban intensification and the development of greenfield and mixed urban sites (and development through the regeneration areas identified in Bradford, Shipley and Keighley) is likely to increase population density within the urban area across Bradford – though it is likely the increase will be greater under this option. Distributing growth in this way is likely to ensure there is good accessibility to healthcare facilities and services for new residents, but an increase in local population could also increase pressure on existing services where capacity is insufficient and additional provision is not delivered alongside growth. Additionally, the focus on redeveloping sites could help to remove contamination through remediation effects, thus reducing sources of environmental health risk.

6.4.17 Whilst development through this option would likely reduce the number of new residents impacted by noise and air pollution, linked to a lower level of development within the city centre of Bradford, it is possible that growth could result in other areas of the district being impacted by such pollution. This is linked to an intensification of use on sites. However, given the dispersed level of growth, the effects would likely be reduced. It is also worth noting that the development of greenfield sites could result in the loss of informal and formal green spaces that are not designated open spaces. This is a key concern for health and wellbeing, as such areas can provide opportunities for recreation, physical activity and contact with nature, supporting both physical and mental health. Their loss could therefore have negative effects, particularly where accessible alternative greenspace is limited. It is recognised that development could incorporate new or improved open space; however, this would not necessarily compensate for the loss of existing greenspace, particularly where this is well used or provides an important local amenity (or cannot be replaced in the same location).

6.4.18 Reflecting on the above, this option is predicted to have **moderate positive effects** due to the accessibility of sites to infrastructure that supports health and wellbeing. Additionally, the distribution of growth could help to reduce pressure on healthcare services and facilities in specific settlements, and the use of previously developed and mixed-use sites could provide opportunities for land remediation. However, **moderate negative effects** are also noted, due to the reliance upon and anticipated loss of greenfield sites and urban green spaces, which could reduce opportunities to engage in physical and social activity. Uncertainty is also reflected, given that effects are largely dependent upon the location, scale and design of development and their infrastructure provision.

RA2A – Urban edge expansion around Bradford

6.4.19 Delivering residual growth through this approach would focus on sites with a good level of access to healthcare infrastructure – with only 15 sites being between 1.5km and 5km from the nearest GP Surgery (including New Close Road, Nabwood; Mount Pleasant Farm, Sandy Lane; and Shetcliffe Lane).

Crucially, under this option no development would be delivered over 5km from the nearest GP Surgery. Additionally, only one site would be further than 500m walking distance from the nearest open space (West Gate Hill Street (1) would be 2.5-3km away). However, it is noted that most sites would be 1.4km walking distance from the nearest sports centre or swimming pool.

6.4.20 Focusing growth within the identified regeneration areas and the urban edge of Bradford city itself is likely to increase the proportion of the district's population living within the urban area. This would likely result in positive effects for new residents, as it is likely these sites would be well connected to infrastructure that supports physical and mental health and wellbeing, either due to site proximity to such infrastructure or the higher likelihood of connectivity via active and sustainable transportation opportunities. For example, sites such as New House Lane, Stocks Lane and the wider Clayton Heights sites to the south / south-west would likely have good access to Westwood Park Diagnostic and Treatment Centre and Community Hospital. Whilst it is noted that existing healthcare services and infrastructure that supports physical and mental health could experience a level of pressure associated with new growth, it is noted that sites within proximity to one another could deliver community benefits, dependent on development design. For example, clusters of sites around Sandy Lane, Holme Wood and Bierley are positioned well to deliver additional open space, leisure facilities, or healthcare services through developer contributions or site design.

6.4.21 However, it is recognised that development focused on the regeneration areas and the urban edge of Bradford city could lead to increased noise and air pollution associated with vehicle movements, construction and an intensification of activity – especially within Bradford city itself. This could be detrimental to existing communities, especially located along the strategic transport corridors (such as the B6145 and A647), where such pollution is likely to be higher. Furthermore, more intense development within the urban edge could result in health inequalities within the city itself (linked to reduced access if infrastructure were not to come forward), or increased inequalities in some of the more peripheral locations in the district.

6.4.22 On balance, the strong accessibility of sites to healthcare services, open space and existing urban infrastructure, together with opportunities to deliver enhanced community facilities alongside development, means that this option is likely to generate **moderate positive effects** in relation to health and wellbeing. There is the potential for **minor negative effects**, associated with localised increases in noise and air pollution, and increased pressure on services in a concentrated location.

RA2B – Urban edge expansion across the District

6.4.23 Delivering growth through this approach would focus on sites with a mixed level of access to healthcare infrastructure – with 63 sites being between 1.5km and 5km from the nearest GP Surgery (including New Close Road, Nabwood; Brogden House Farm A, Boy Lane, Bierley; and Marsh Top Farm, Moorhouse Lane). Furthermore, eleven sites would be delivered over 5km from the nearest GP Surgery (including Menston Old Lane; Bradford Road; and Main Street / A65).

6.4.24 Additionally, 16 sites would be further than 500m walking distance from the nearest open space, and the West Gate Hill Street (1) site would be 2.5-3km away. It is also noted that most sites would be 1.4km walking distance from the nearest sports centre or swimming pool.

6.4.25 It is also important to note that whilst this approach to growth includes a number of sites distributed across the district, growth is unlikely to come forward on all sites – rather, it is likely that growth will come forward in the most sustainable sites. As such, it is possible that negative effects linked to accessing healthcare infrastructure can be limited. Nonetheless, the large number of sites with poorer accessibility characteristics means that a proportion of residual growth would not be ideally located in this regard.

6.4.26 Similarly to Option RA2A, this approach to growth would focus development partially within the regeneration areas identified in Bradford, Shipley and Keighley, and the urban edge of Bradford city itself, which is likely to increase the proportion of the district's population living within the urban area. As such, the benefits and drawbacks discussed under Option RA2A are anticipated to be applicable for Option RA2B – with the exception of potential issues linked to concentrated growth within Bradford city. This is due to the approach to growth under Option RA2C incorporating sites on the edges of other settlements across the district – including Baildon, Keighley, Oakworth, and Steeton. This would likely help to reduce the potential for inequalities linked to health to arise, as development could be distributed to reduce adding pressure to infrastructure in one location. Additionally, where sites are located within proximity to one another (for example, the sites to the south of Burley and to the north of Menston), there could be scope to deliver additional health infrastructure – though this is dependent on development design.

6.4.27 Furthermore, whilst distributing growth across the district could lead to increased noise and air pollution associated with vehicle movements, construction and an intensification of activity within the settlements, it is likely that adverse impacts could be avoided to an extent through selective site choice. It is also noted that distributing growth in this way will bring forward development in some of the smaller settlements in the district, which have fewer services and facilities. As such, whilst development would support the vitality of smaller services at a local scale, it is less likely to encourage sustainable access to healthcare facilities – as some residents will likely need to travel further afield.

6.4.28 In conclusion, growth through this approach would have **moderate positive effects** in relation to health and wellbeing, due to development being focused within broadly accessible locations, and the potential for growth to better support the vitality of a wider range of existing settlements. There is also the potential to deliver additional healthcare services and facilities across the district through this approach. However, **minor negative effects** could still occur, reflecting localised impacts and accessibility constraints, which could be mitigated to some degree through site selection.

RA2C - Urban edge expansion without reliance on Regeneration Areas

6.4.29 Delivering growth through this approach would focus on sites with a mixed level of access to healthcare infrastructure – with 63 sites being between 1.5km and 5km from the nearest GP Surgery (including New Close Road, Nabwood; Brogden House Farm A, Boy Lane, Bierley; and Marsh Top Farm, Moorhouse Lane). Furthermore, development through eleven sites would be delivered over 5km from the nearest GP Surgery (including Menston Old Lane; Bradford Road; and Main Street / A65). Additionally, 16 sites would be further than 500m walking distance from the nearest open space, and the West Gate Hill Street (1) site would be 2.5-3km away. It is also noted that most sites would be 1.4km walking distance from the nearest sports centre or swimming pool.

6.4.30 It is important to note that whilst this approach to growth includes a number of sites distributed across the district, growth is unlikely to come forward on all sites – rather, it is likely that growth will come forward in the most sustainable sites. As such, it is possible that negative effects linked to accessing healthcare infrastructure can be avoided to an extent. Nonetheless, a large number of sites are located in locations that could promote car usage rather than walking and cycling.

6.4.31 Focusing growth within the urban edge of Bradford city and other settlements across the district is likely to increase the proportion of the population living within the urban area. This is especially true given that development through this option would not involve the regeneration areas identified within the City of Bradford, Shipley and Keighley – and as such, an additional 6,000 homes could come forward on these urban edge sites. This would likely result in positive effects for new residents, as it is likely these sites would be well connected to infrastructure that supports physical and mental health and wellbeing, either due to site proximity to such infrastructure or the likelihood of connectivity via active and sustainable transportation opportunities. For example, sites such as New House Lane, Stocks Lane and the wider Clayton Heights sites to the south / south-west would likely have good access to Westwood Park Diagnostic and Treatment Centre and Community Hospital. Whilst it is noted that existing healthcare services and infrastructure that supports physical and mental health could experience a level of pressure associated with new growth, it is noted that sites within proximity to one another could deliver community benefits, dependent on development design. For example, clusters of sites around Sandy Lane, Holme Wood and Bierley are positioned well to deliver additional open space, leisure facilities, or healthcare services through developer contributions or site design.

6.4.32 However, it is recognised that development focused on the urban edge of Bradford city could lead to increased noise and air pollution associated with vehicle movements, construction and an intensification of activity – especially within Bradford city itself. This could be detrimental to existing communities, especially located along the strategic transport corridors (such as the B6145 and A647), where such pollution is likely to be higher.

6.4.33 Furthermore, more intense development at the urban edges could result in health inequalities within the city itself (linked to reduced access or increased pressure on services if infrastructure were not to come forward), or increased inequalities across the district (where additional infrastructure comes forward in such areas instead of being brought forward in more deprived areas).

6.4.34 Additionally, growth through this option may result in more green belt land being released to accommodate the additional 6,000 homes, which could result in the loss of valued open space, and could also reduce regeneration opportunities – as more greenfield sites would come forward. It is also noted that distributing growth in this way will bring forward development in some of the smaller settlements in the district, which are likely to have less services. As such, whilst development would support the vitality of smaller services at a local scale, it is less likely to encourage sustainable access to healthcare facilities – as a proportion of residents will likely need to travel longer distances.

6.4.35 Overall, this option is predicted to generate **moderate positive effects** through the delivery of housing in generally accessible locations, and due to the potential to secure new health and community infrastructure linked to development design and developer contributions. However, there is also the potential for **moderate negative effects** due to increased pressure on existing healthcare infrastructure, increase noise and air pollution impacts, and the potential to exacerbate health inequalities. There is also a reduced focus on Regeneration Areas, which could see less progress in these important locations.

RA3A: Grey Belt-led strategy

6.4.36 Delivering growth through this approach would focus on sites with a mixed level of access to healthcare infrastructure – with 35 sites being between 1.5km and 5km from the nearest GP surgery (including Glenview Close Nab Wood; Hill Top Road; and Street Lane), and 10 sites over 5km from the nearest GP surgery (including Banner Grange, Bradford Road; Land off Menston Old Lane). Additionally, six sites would be further than 500m walking distance from the nearest open space (including Halifax Road; and Hill End Lane - Harden), and the West Gate Hill Street (1) site would be 2.5-3km away. It is also noted that most sites would be 1.4km walking distance from the nearest sports centre or swimming pool. It is also important to note that whilst this approach to growth includes a number of sites distributed across the district, growth is unlikely to come forward on all sites – rather, it is likely that growth will come forward on sites that do not perform strongly in green belt terms and are less constrained in other regards. Nevertheless, a sizeable proportion of the pool of sites are not located in the most sustainable locations from an accessibility perspective.

6.4.37 Growth through this scenario would likely deliver more distributed development across Bradford. This would likely help to reduce pressure on services within Bradford City.

6.4.38 Whilst a more distributed approach to growth could lead to access issues, it is likely this could be moderated by selecting the more sustainably located sites.

6.4.39 The majority of the potential sites are located adjacent to existing settlement boundaries – which could allow for access to important supporting infrastructure. Additionally, where there are clusters of multiple sites (for example, sites to the east of Cullingworth and sites to the south / south-east of Burley in Wharfedale), there could be the potential to deliver additional healthcare infrastructure – though it is noted this is dependent on the development taken forward

6.4.40 Furthermore, whilst distributing growth across the district could lead to increased noise and air pollution associated with vehicle movements, construction and an intensification of activity within the settlements, it is likely that adverse impacts could be minimised through selective site choice (and the effects would be more dispersed).

6.4.41 In conclusion, this approach to growth is considered likely to result in **moderate positive effects**, due to providing housing in areas with acceptable or good access to health facilities and wider community services It also reflects the potential for development to reduce pressure on individual service centres and create opportunities for infrastructure improvements in a wider range of communities. It is noted that there is the potential for **minor negative effects**, but this is largely linked to localised accessibility and environmental health impacts, which could be mitigated to an extent through the planning and delivery process.

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

6.4.42 Delivering growth through this approach would focus on sites with a mixed level of access to healthcare infrastructure – with 35 sites being between 1.5km and 5km from the nearest GP surgery (including Glenview Close Nab Wood; Hill Top Road; and Street Lane), and 10 sites over 5km from the nearest GP surgery (including Banner Grange, Bradford Road; Land off Menston Old Lane). Additionally, six sites would be further than 500m walking distance from the nearest open space (including Halifax Road; and Hill End Lane - Harden), and the West Gate Hill Street (1) site would be 2.5-3km away. It is also noted that most sites would be 1.4km walking distance from the nearest sports centre or swimming pool. It is also important to note that whilst this approach includes a number of sites distributed across the district, growth is unlikely to come forward on all sites.

6.4.43 Residual growth through this scenario would deliver more distributed development across Bradford. This would likely help to reduce additional pressure in specific locations. However, it does place more growth in less accessible locations generally speaking. Nonetheless, the majority of the potential sites are located adjacent to existing settlement boundaries – which should allow for access to important supporting infrastructure. Additionally, where there are clusters of multiple sites (for example, sites to the east of Cullingworth and sites to the south / south-east of Burley in Wharfedale), there could be the potential to deliver additional healthcare infrastructure.

6.4.44 It is recognised that focusing growth on previously developed sites could help to remove contamination through remediation effects, thus reducing sources of environmental health risk.

6.4.45 Distributing growth across the district could lead to an increase in noise and air pollution associated with vehicle movements, construction and an intensification of activity within the settlements. However, it is likely that adverse impacts could be avoided through selective site choice and a more dispersed pattern of growth.

6.4.46 It is noted that this growth approach would not rely upon the Regeneration Areas identified within Bradford, Shipley and Keighley – and as such, up to an additional 6,000 homes could be delivered across the grey belt sites.

6.4.47 This would likely lead to an increase in pressure on services and facilities in smaller settlements, due to an increase in population (though it is noted that this level of growth could accommodate for developer contributions that deliver additional supporting infrastructure). Development through this approach would also likely result in the loss of valued greenspace that contributes towards health and wellbeing.

6.4.48 Reflecting on the above, the option is predicted to generate **moderate positive effects** through the provision of housing in locations that are generally connected to existing settlements and infrastructure, and through opportunities to secure new community benefits alongside development. However, the potential for **moderate negative effects** is also noted - associated with the loss of open land and increased pressure on services in smaller settlements, which in some locations could result in adverse impacts upon health and wellbeing and engagement with healthy lifestyles.

Comparison of options (Health and Wellbeing)

6.4.49 All options are likely to result in both positive and negative effects in relation to health and wellbeing. Positive effects are associated with the delivery of new homes, including affordable housing, regeneration, improved access to healthcare and community facilities, opportunities for active travel, and support for local services and facilities. Negative effects are principally associated with pressure on existing infrastructure, loss of green space, impacts on community identity, and development in locations with more limited access to services and facilities.

6.4.50 Overall, the stronger performing options are those which maintain a clear focus on Bradford's Regeneration Areas whilst also providing sufficient flexibility to meet housing needs and secure supporting infrastructure without directing high amounts of residual growth to areas with less accessibility. In this respect, RA2A and the Preferred Option perform favourably as they achieve a balance between accessibility, regeneration, housing delivery and infrastructure provision. Both are predicted to have moderate positive effects with some minor negatives.

6.4.51 RA1A also performs strongly due to its accessibility and regeneration benefits, although its inability to fully meet housing needs introduces an element of uncertainty to the extent of the positive effects that may arise through improved housing availability, affordability and choice. However, this option is better at avoiding negative effects in terms of loss of open space, amenity and delivery of housing in less accessible locations at the fringes of settlements.

6.4.52 The options that disperse growth more widely still bring about positive outcomes in respect of regeneration and accessible developments, but to a slightly lesser extent. There is also a greater amount of growth directed to less accessible locations on the urban fringes of lower order settlements. The potential for impacts on community wellbeing, identify and amenity are heightened for these options too (especially for RA2C and RA3B which involve higher levels of growth on fringe sites). These options do however perform more favourably in terms of increased housing delivery, affordable housing provision and support for the vitality and long-term sustainability of services within a wider range of settlements.

6.4.53 Overall, strategies which combine regeneration-led growth with sufficient opportunities to meet housing needs are more likely to deliver the most favourable health and wellbeing outcomes. However, it is important to recognise that options involving a greater distribution of growth across the district may also generate meaningful health benefits through housing delivery and support for local communities, even where accessibility and regeneration benefits are comparatively weaker. The options perform similarly in terms of significance, but more weight should be given to those options that bring about the greatest potential to reduce health inequalities whilst avoiding more prominent negative effects due to the loss of greenfield land.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
++	++ ?	++	++	++	++	++	++
-	-	--?	-	-	--	-	--

6.5 Economy

IA objectives

- **(4a)** Increase the number of additional jobs delivered, particularly for high-skilled/paid employment opportunities.
- **(4b)** Ensure that job opportunities are suited to the needs of the local workforce across all age groups, as well as providing new opportunities for training and education
- **(4c)** To deliver economic growth through attracting significant investment to provide new/enhance employment floor space, new development within regeneration areas and town centres, as well as through the expansion of existing businesses.

Implications of the constants

6.5.1 Development within the urban areas of Bradford through the constant sites is anticipated to bring forward mixed effects in relation to the economy. For example, housing growth is anticipated to provide additional jobs for the workforce – through construction phases of development, and including new jobs for residents.

6.5.2 Furthermore, increased development within the urbanised parts of Bradford is anticipated to promote accessibility to key employment areas – including (but not limited to): Worth Village, Keighley; Paradise Green; and Shipley. By including these constant sites across the options, there is a focus on ensuring that growth is distributed well to access economic infrastructure (job opportunities, businesses themselves etc) located across the district and not just within the regional centre of Bradford itself.

6.5.3 Additionally, directing growth towards existing urban areas through the constant sites has the potential to enhance the attractiveness of these locations for investment, for example by increasing local labour supply, supporting the local economy and encouraging an efficient use of existing infrastructure. The concentration of growth within proximity to existing settlement centres could also facilitate access to education, training, and employment opportunities.

6.5.4 However, it is noted that some of the constant sites have better access to employment centres than others – with a number of sites being over 2.5km from the nearest centre, and several over 5km from the nearest centre (including the Close Head Lane site and the Turner Lane site). As such, development through these options has the potential to lead to differences in economic activity, especially if supporting infrastructure does not come forward to allow for easier access for all.

Preferred option

6.5.5 The preferred option will deliver development on sites that are not within walking distance from existing employment areas – 33 sites would be between 1.5km-5km walking distance from the nearest employment area, and 17 would be over 5km walking distance. However, access via public transport and car-based transport would still allow for good access to employment and economic opportunities from these locations.

6.5.6 However, the delivery of further housing growth would also generate direct and indirect employment opportunities through construction activity, associated supply chains and increased demand for local services and facilities.

6.5.7 Growth through the preferred option will direct a proportion of residual development to the regional city of Bradford, which provides new residents with good access to existing employment and economic opportunities within the regional city, and more widely within the district. Additionally, focusing growth in this way is anticipated to promote more sustainable patterns of growth and investment, as development would be focused in areas with existing infrastructure in place. As such, it is recognised that this option has potential to strengthen investment by concentrating development in locations that can support business growth, maximise the efficient use of infrastructure and provide access to a larger workforce.

6.5.8 A proportionate level of growth would also be spread across other settlements, which encourages a level of investment across the district which is likely to contribute towards reducing economic inequalities. By supporting the growth of existing settlements, the preferred option has the potential to increase local spending, strengthen the customer base for businesses, and create conditions that support inward investment and economic expansion.

6.5.9 This would also be anticipated to support regeneration and reinforce existing investment priorities across the district, whilst also contributing towards the creation of employment opportunities in a wider range of locations.

6.5.10 Overall, **major positive effects** are considered likely under this option. This reflects the concentration of growth within Bradford itself and other principal urban areas, whilst also providing growth in other settlements in line with their role and function. This is anticipated to support regeneration, reinforce existing investment opportunities, and increase access to economic and employment opportunities.

RA1A – Urban intensification through previously developed land

6.5.11 Eleven sites are between 1.5km and 5km walking distance from the nearest employment zone, and as such are considered to have more limited access to economic opportunities by active travel. A further three sites are over 5km walking distance from the nearest employment zone.

6.5.12 Additionally, seven sites wholly or partially overlap with employment zones, and as such are considered to positively contribute to the economy due to the proximity of economic and investment opportunities (provided that it does not lead to a net loss in employment land):

- Otley Road.
- Shearbridge Road.
- Cumberland House, Cemetery Road.
- Northwise Road, Girlington.
- Dalton Mills, Dalton Lane, Keighley.
- Royd Ings Avenue, Keighley.
- Castlefields Lane.

6.5.13 An approach to growth through urban intensification and the development of previously developed land is anticipated to strongly support the local economy. This is due to a focus on regeneration in the urban environment – as directing growth and investment into existing settlements can support local businesses and industries, increase spending within local economies, and strengthen the viability of existing commercial areas. Additionally, regeneration and urban intensification have the potential to improve the attractiveness of locations for inward investment by making more efficient use of existing infrastructure and services, and creating opportunities for the renewal of underutilised land and buildings (for example, by encouraging mixed-use development that supports smaller businesses, flexible workspace and start-up opportunities, and supporting wider regeneration priorities across the district). This is especially relevant for the Regeneration Areas identified within the centre of Bradford, Shipley, and Keighley, where development may contribute towards the delivery of investment priorities, employment opportunities, and skills development programmes associated with regeneration activity.

6.5.14 However, it is noted that previously developed land can be constrained, and as such the potential for mixed-use development would be dependent on deliverability and viability.

6.5.15 Furthermore, it is also recognised that an approach to growth involving urban intensification and regeneration could potentially increase competition between housing and economic development. Additionally, this option for growth would not deliver the identified level of housing needed across the district, which could adversely impact upon economic provision as there would be less accommodation for the workforce of the district.

6.5.16 Overall, this approach to growth is anticipated to have **moderate positive effects** in relation to the economy. Whilst it would support economic growth, development through this option is unlikely to be able to deliver as many positive effects given that it would deliver lower housing growth.

RA1B – Urban intensification through additional urban sites

6.5.17 53 sites are between 1.5km and 5km walking distance from the nearest employment zone, and as such are considered to have more limited access to economic opportunities through active modes of travel. A further 18 sites are over 5km walking distance from the nearest employment zone.

6.5.18 Whilst these sites are not ideally located from an active travel perspective, it is important to note that access by public transport and car-based travel would remain an option. Furthermore, not all of the sites involved in this pool would be required, and there would be some flexibility to choose the better-connected locations.

6.5.19 Six sites wholly or partially overlap with employment zones and as such are considered to positively contribute to the economy due to the proximity of economic and investment opportunities (provided there is no net loss in employment land).

6.5.20 Growth through urban intensification and the development of greenfield and mixed sites, as well as development within the identified Regeneration Areas within Shipley, Keighley and Bradford, is likely to encourage regeneration across the district. Development should contribute towards the delivery of investment priorities, employment opportunities, and skills development programmes associated with regeneration activity. Additionally, it is possible that greenfield inclusion could increase development capacity, as there may be greater availability of sites, and potentially larger sites that could provide opportunities for greater development scales within the urban area.

6.5.21 As such, it is likely that this approach to growth could support greater economic benefits when compared to RA1A, given that it would likely provide more opportunities to deliver mixed-use and flexible development, attract investment, and support business growth (therefore increasing economic opportunities). This option would also increase the local population and labour force, support local spending, and likely strengthen the customer base for existing businesses. Furthermore, the delivery of development would generate employment opportunities during construction and could support longer-term job creation through associated commercial development and increased demand for services. The scale of development may also create opportunities for developer investment in infrastructure that supports economic productivity, including education, training and skills facilities, transport improvements and other infrastructure that enables access to employment opportunities.

6.5.22 However, it is recognised that growth through this option could negatively impact upon the local economy across Bradford. This is due to the potential for the focus on regeneration of smaller sites to be diverted away, as greenfield opportunities can be more attractive than constrained brownfield sites. Consequently, there is a risk that the delivery of regeneration objectives in certain urban locations could be delayed or reduced, potentially limiting the economic, social and environmental benefits that redevelopment of previously developed land could otherwise deliver. These effects are marginal though given that there is substantial growth identified through the constant supply.

6.5.23 Overall, **major positive effects** are predicted, reflecting the combination of regeneration-led growth with additional development in the urban area, which is anticipated to attract a greater number of new residents and support local workforce growth, investment, and economic activity.

RA2A – Urban edge expansion around Bradford

6.5.24 33 sites are between 1.5km and 5km walking distance from the nearest employment zone, and as such are considered to have more limited access to economic opportunities through active modes of travel.

6.5.25 Whilst the sites above are not ideally located from an active travel perspective, it is important to note that access by public transport and car-based travel would remain an option. Furthermore, not all of the sites involved in this pool would be required, and there would be some flexibility to choose the better-connected locations. It is also worth noting that none of the sites are over 5km walking distance from the nearest employment zone.

6.5.26 Development focused within Bradford itself (through identified sites and the Bradford Regeneration Areas) is likely to create a concentrated investment focus within city. This would be anticipated to bring forward positive effects in relation to the economy, as it would support businesses and employment levels, and contribute to increased local spending.

6.5.27 As such, it would likely strengthen the role of Bradford as the regional city in the district. Focused development within the city could also help to strengthen key infrastructure that supports economic activity, such as improved transportation connections, and facilities that provide opportunities for training, education, and upskilling. Furthermore, this approach also focuses residual growth at greenfield sites on the edges of the city. This is considered a further benefit as it has the potential to attract further investment and longer-term opportunities, which could include employment growth corridors and transportation network upgrades.

6.5.28 However, development focused within and around the regional city would be expected to lead to the uneven distribution of benefits across the district – which could exacerbate inequalities associated with employment and income. Furthermore, focusing development within one location could result in businesses elsewhere across the settlement struggling to compete for investment and employees, especially within smaller settlements. However, it is recognised that regeneration areas within Shipley and Keighley will also likely contribute towards a level of distribution of growth and associated inward investment, so the potential for negative effects is reduced.

6.5.29 Reflecting on the above, this approach is anticipated to have **major positive effects** in relation to the economy. This is due to focusing the majority of growth within and around the regional city of Bradford, and therefore encouraging investment opportunities and economic growth into the most sustainable location in the district.

RA2B – Urban edge expansion across the District

6.5.30 There are 99 sites between 1.5km and 5km walking distance from the nearest employment zone, and as such are considered to have more limited access to economic opportunities by active travel. A further 50 sites are over 5km walking distance from the nearest employment zone and as such are even less accessible. However, these sites are still broadly accessible by public transport and car-based travel.

6.5.31 It is also recognised that not all of these sites would be allocated under this option. As such, growth could be directed towards sites with better access to employment opportunities, infrastructure and services.

6.5.32 At the same time, directing development towards locations with stronger access to employment opportunities (including through the regeneration areas at Bradford, Shipley and Keighley) would provide opportunities to maximise access to existing jobs, businesses, education facilities and skills provision, whilst supporting more sustainable patterns of commuting and economic activity, and encouraging investment.

6.5.33 Development on urban edge sites across the settlements in the district will allow for a more equal distribution of growth, which could help to further spread economic benefits more evenly across multiple communities. This approach has the potential to support local economies by strengthening local labour markets and providing additional spending power to support businesses, services and centres throughout the district. It is also noted that delivering housing across multiple settlements could also generate employment opportunities, whilst helping to provide sufficient accommodation for the workforce of the district in a variety of locations.

6.5.34 By meeting housing needs across a range of locations, the option could support labour market resilience, improve business confidence and contribute towards the district's attractiveness for inward investment. Furthermore, this approach to growth is anticipated to help ensure that housing development is positioned well to access local services and centres, allowing for a boost in settlement economies, and supporting businesses across the district.

6.5.35 Overall, this option would support economic growth in a wider range of locations. However, it is considered to be less effective at maximising positive effects in key locations for employment access and growth when compared to other options. As such, **moderate positive effects** are concluded.

RA2C - Urban edge expansion without reliance on Regeneration Areas

6.5.36 The effects for this approach would be similar to RA2B as discussed above. The principal difference is a lesser reliance on Regeneration Areas, which would see a wider dispersal of growth on greenfield sites at urban edges.

6.5.37 This will help to increase the magnitude of effects in individual settlements, and would lead to an overall increase in the scale of growth. Significant growth could also help to fund transport infrastructure improvements, increased local spending and attract further inward investment. Conversely, the reduced focus on regeneration opportunities could see longer term priorities for economic activity stall, and economic benefits to be directed away from the regional City somewhat.

6.5.38 Overall, **major positive effects** are predicted. Though there is less focus on urban regeneration, this would still form part of the strategy. Likewise, whilst the focus of residual growth is more dispersed, an element is still well balanced with existing and planned economic growth zones. These factors are also weighed against the overall increase in housing delivery on attractive sites which would help to drive economic growth through construction, increased accommodation for a growing workforce.

RA3A: Grey Belt-led strategy

6.5.39 105 sites are between 1.5km and 5km walking distance from the nearest employment zone, and as such are considered to have more limited access to economic opportunities by active modes of travel. A further 72 sites are over 5km walking distance from the nearest employment zone. However, these sites are still broadly accessible by public transport and car-based travel.

6.5.40 It is also recognised that not all of these sites would be allocated under this option. As such, growth could be directed towards sites with better access to employment opportunities across the district, though it is noted that in certain settlements the site options would always have poorer access to employment and economic opportunities (as reflected in the relatively large number of sites that are over 5km from employment zones).

6.5.41 Development through utilising grey belt land (which is dispersed across the district) is anticipated to have economic benefits similar to those discussed for option RA2A.

6.5.42 Given the amount of grey belt land available, it is possible that growth focused through this approach could facilitate larger-scale and more comprehensive development schemes, which may support coordinated investment in transport infrastructure, education and training facilities, community services and commercial floorspace, depending on the development proposals taken forward. The scale of development may also help to attract inward investment, support business growth and create employment opportunities during both the construction and operational phases of development. Furthermore, by contributing towards the delivery of housing needs, this option would help provide accommodation for the district's workforce, supporting labour market growth, economic productivity and business investment across the district.

6.5.43 However, it is also worth noting that the location of the grey belt sites could have an economic impact – as sites with lower levels of accessibility to employment centres, services and public transport may be less attractive for both residents and investment.

6.5.44 In some settlements, the available grey belt sites are inherently less well connected to employment opportunities, which could limit access to jobs and skills development unless supported by additional infrastructure improvements (or assumed car travel). Nevertheless, this option would include Regeneration Areas identified within Bradford, Shipley and Keighley, which are well connected to employment and education, and provide potential for developer contributions and regeneration-led investment to come forward.

6.5.45 In conclusion, **moderate positive effects** are anticipated as likely for the economy under this approach. Whilst economic growth would be supported, it is considered that the distributed level of development may not maximise benefits as well as other approaches can.

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

6.5.46 The effects are similar to RA3A, with the principal difference being an increase in delivery at Grey Belt sites and less reliance on Regeneration Areas.

6.5.47 The delivery of up to 6,000 additional homes on Grey Belt would likely result in a greater level of economic activity. The greater scale of development may help to attract inward investment, support business growth and create employment opportunities during both the construction and operational phases of development. Furthermore, by contributing towards the delivery of housing needs, this option would help provide accommodation for the district's workforce, supporting labour market growth, economic productivity and business investment across the district.

6.5.48 Overall, **major positive effects** are still considered likely under this option for growth. Though the dispersed pattern of growth is less conducive to balancing housing growth in areas of most economic potential, this is offset by an overall increase in development that would likely occur (and the associated benefits across the district).

Comparison of options (Economy and employment)

6.5.49 All of the options are anticipated to result in positive effects against the economic objectives through the delivery of housing, construction activity, increased expenditure within local economies and growth in the available workforce. The scale of benefit varies according to the extent to which each option supports regeneration priorities, attracts investment and aligns housing growth with existing employment locations and future economic opportunities.

6.5.50 The Preferred Option is considered likely to result in a major positive effect and is the most favourable approach in this regard. By concentrating a significant proportion of growth within Bradford and the District's principal urban areas, whilst also providing growth in other settlements proportionate to their role and function, the option would support regeneration, reinforce existing investment priorities and increase access to employment opportunities. It would also support local businesses, rural communities and the visitor economy across a broader geographic area. Overall, this option provides the most balanced response to the economic objectives.

6.5.51 RA1B and RA2A are also predicted to result in major positive effects. RA1B combines regeneration-led growth with additional development capacity within the urban area, helping to support workforce growth, investment and economic activity. RA2A performs strongly by focusing growth around Bradford, thereby supporting the District's principal economic centre and creating opportunities for strategic infrastructure investment and longer-term economic growth.

6.5.52 RA2C and RA3B are similarly considered likely to result in major positive effects, reflecting the scale of housing growth which could be delivered and the associated benefits arising from workforce expansion, construction activity and increased expenditure across the District.

6.5.53 RA2B, RA3A and RA1A are predicted to result in moderate positive effects. Whilst each option would support economic growth, they are considered less effective at maximising the combined benefits associated with regeneration, inward investment and workforce growth. RA2B and RA3A distribute development more widely across the District, resulting in a less concentrated pattern of investment, whilst RA1A is constrained by lower housing delivery and therefore provides less opportunity to support long-term labour force growth.

6.5.54 Overall, the strongest performing options are those which combine housing growth with regeneration opportunities in Bradford and the principal urban areas, whilst also supporting economic activity across the wider District. Options which either constrain growth or place less emphasis on regeneration are still expected to generate positive economic effects, although the magnitude of benefit is predicted to be lower.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
+++	++	+++	+++	++	+++	++	+++

6.6 Natural environment

IA objectives

- **Biodiversity (5a)** To conserve and enhance geodiversity and biodiversity, including: designated and locally important species and habitats; maintaining and strengthening ecological corridors; and identifying, protecting and enhancing supporting habitats.
- **Landscape (6a)** To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes.

Implications of the constants

Biodiversity

6.6.1 Focusing first on internationally designated sites for biodiversity, only one constant site is within 1km of a Special Area of Conservation (SAC) and Special Protection Area (SPA), specifically the South Pennine Moors. This is Stockheld Road (H386) (0.2ha), which is 960m from the SAC and SPA. As such, the likelihood of significant effects is considered to be relatively low in this regard.

6.6.2 In terms of nationally designated sites for biodiversity, the following constant sites are within 1km of a Site of Special Scientific Interest (SSSI):

- West Lane (H28) (0.8ha) – 590m from Trench Meadows.
- Sheriff Lane (1) (H77) (0.3ha) – 901m from Trench Meadows SSSI.
- Stockheld Road (H386) (0.2ha) – 960m from the South Pennine Moors.

6.6.3 The following constant sites are within 100m of ancient woodland:

- Fenwick Drive, Woodside (H1252) (7.8ha) – 0m to Old Hanna / Low Woods.
- Hainworth Wood Road, Keighley (H551) (3.2ha) – 4m from Hainworth Wood.
- Roundwood Avenue, Ravenscliffe (H585) (3.9ha) – 39m from Round / Bill Woods.
- North Parade, Allerton (H773) (1.4ha) – 80m from Chellow Dean.

6.6.4 The following constant sites overlap (>25%) with priority habitat:

- Hainworth Road, Keighley (H550) (0.2ha) – 100% overlap with deciduous woodland.
- Woodhouse Road, Keighley (H554) (0.8ha) – 99% overlap with deciduous woodland.
- Roundwood Avenue, Ravenscliffe (H585) (3.9ha) – 62% overlap with additional habitats (no main habitat).
- Cleckheaton Road (H994) (0.5ha) – 33% overlap with deciduous woodland.

6.6.5 In terms of locally designated sites for biodiversity, 22 constant sites are within 100m of an LWS.

6.6.6 Overall, it is evident that the majority of constant sites are not located within close proximity to international or national biodiversity sites. However, a small number of sites overlap with priority habitats and / or are relatively close to ancient woodland and local wildlife sites. There is some potential for cumulative effects upon biodiversity, but it is expected that much of this element of growth could be suitably accommodated without significant effects arising.

Landscape

6.6.7 Focusing on the potential impact of development on landscape character, only one constant site is within 1km of a National Landscape – Church Street / Main Street (H26) (0.2ha), which is 292m from Nidderdale.

6.6.8 None of the constant sites are within 1km of a National Park.

6.6.9 In terms of landscape sensitivity, four constant sites have a 'red' colour coding (medium-high landscape sensitivity), whilst 14 have an 'amber' colour coding (low-medium to medium landscape sensitivity).

6.6.10 The following constant sites contain more than two Tree Preservation Order (TPO):

- West of Green Lane (H1136) (1.3ha) – contains 37 TPOs
- Woodside Road (H1089) (5.6ha) – contains seven TPOs

6.6.11 It is evident that the constant element of supply largely avoids the most sensitive locations within the District, but locally, negative effects are likely to arise at individual sites and cumulatively.

Preferred Option

Biodiversity

6.6.12 Focusing first on internationally designated sites for biodiversity, only two of the variable sites are within 1km of a SAC and SPA, specifically the South Pennine Moors. These are:

- Ben Rhydding Drive, Wheatley Grove (H383) (7.2ha) – 394m
- Coutances Way (H385) (7.4ha) – 850m

6.6.13 In terms of nationally designated sites for biodiversity, only one variable site is within 1km of a SSSI – Ben Rhydding Drive, Wheatley Grove (H383) (7.2ha), which is 394m from the South Pennine Moors SSSI.

6.6.14 The following constant sites are within 100m of ancient woodland:

- Bingley Road / Long Lane, Heaton (H780) (20.3ha) – overlaps with Royds Cliff Wood
- Hudson View (H924) (5.3ha) – overlaps with Old Hanna / Low Woods
- Haworth Road, Sandy Lane (H694) (7.6ha) – 48m from Chellow Dean
- Harper Gate Farm, Ned Lane (H997) (2.6ha) – 63m from Black Carr
- Bingley Road, Nabwood (H1059) (5.3ha) – 70m from Nab Wood
- Land east of Harrogate Road, Greengates (H636) (1ha) – 88m from Calverley / Lodge Woods

6.6.15 None of the variable sites overlap (>25%) with priority habitat.

6.6.16 In terms of locally designated sites for biodiversity, 11 variable sites are within 100m of an LWS.

6.6.17 Overall, this option is predicted to lead to **minor negative effects** for both biodiversity. Only a small amount of growth is directed toward locations that could more directly impact upon the South Pennine Moors, and therefore significant effects are avoided in this regard. Though there is a selection of sites that are within close proximity to or overlap with locally important wildlife features and / or priority habitats, it should be possible to mitigate these effects effectively. Nonetheless, negative effects are likely given the scale of greenfield land affected by residual growth.

Landscape

6.6.18 Focusing on the potential impact of development on landscape character, the following variable sites are within 1km of a National Landscape:

- Great Pasture Lane (H119) (18.2ha) – 70m from Nidderdale
- Bolton Road (H11) (1.4ha) – 176m from Nidderdale
- Coutances Way (H385) (7.4ha) – 215m from Nidderdale

6.6.19 None of the constant sites are within 1km of a National Park.

6.6.20 In terms of landscape sensitivity, 11 variable sites have a 'red' colour coding (medium-high landscape sensitivity), whilst all but one of the remaining sites have an 'amber' colour coding (low-medium to medium landscape sensitivity).

6.6.21 Only one of the variable sites contains more than two TPOs – Airedale House, Skipton Road (H522) (1.1ha), which contains six TPOs.

6.6.22 Overall, **moderate negative effects** are predicted. Several sites fall within close proximity to Nidderdale AONB, and could have negative visual impacts. Furthermore, there are a selection of sites that are sensitive to growth, and cumulatively, in combination with constant elements of growth, this could lead to significant effects.

RA1A– Urban intensification through previously developed land

Biodiversity

6.6.23 Focusing first on internationally designated sites for biodiversity, none of the variable sites under this option are within 1km of a SAC, SPA or Ramsar site.

6.6.24 In terms of nationally designated sites for biodiversity, only two variable sites under this option are within 1km of a SSSI or NNR:

- West Lane (H41) (8.1ha) – 624m from Trench Meadows SSSI
- Whitley Street (H108) (0.5ha) – 690m from Bingley South Bog SSSI

6.6.25 None of the variable sites under this option contain or are adjacent to ancient woodland.

6.6.26 Only two variable sites under this option overlap (>25%) with a priority habitat:

- North side of Becks Road, Keighley (H464) (0.2ha) – 87% overlap with deciduous woodland
- Castlefields Lane (H91) (0.7ha) – 68% overlap with deciduous woodland

6.6.27 In terms of locally designated sites for biodiversity, nine of the variable sites under this option are within 100m of an LWS.

6.6.28 Overall, it is considered that this option will likely lead to **minor positive effects** on biodiversity, with potential for net positive benefits via BNG delivery in the longer term. The sites are mostly distant from designated habitats and there is limited overlap with biodiversity features.

6.6.29 The option's focus on PDL (which often has a low baseline level of biodiversity) provides opportunities for improvements in urban ecological networks, potentially bolstering the resilience of habitats and species. However, it is also worth noting that BNG gains can be hard to achieve in urban environments, particularly if there is a base level of value that needs to be enhanced. There are also cumulative pressures to consider.

Landscape

6.6.30 Focusing on the potential impact of development on landscape character, none of the variable sites under this option are within 1km of a National Landscape or National Park.

6.6.31 In terms of landscape sensitivity, none of the variable sites under this option have a 'red' colour coding (medium-high landscape sensitivity), whilst only two have an 'amber' colour coding (low-medium to medium landscape sensitivity).

6.6.32 None of the variable sites contain more than two TPOs, and only four contain one TPO.

6.6.33 This option is unlikely to adversely impact landscape character, and again, could lead to enhancements via green infrastructure delivery and urban regeneration particularly in existing settlement areas.

6.6.34 However, given that housing needs would not be met in full, there would be a risk that ad hoc growth could occur in more sensitive locations, which moderates the overall effects somewhat. Therefore, a **neutral effect** is predicted.

RA1B – Urban intensification through additional urban sites

Biodiversity

6.6.35 Focusing first on internationally designated sites for biodiversity, several of the variable sites under this option are within 1km of a SAC, SPA or Ramsar site, namely:

- Green End Road (H297) (0.7ha) – 718m from South Pennine Moors SAC and SPA
- Leeds Road (H355) (2.1ha) – 768m from South Pennine Moors SAC and SPA

- Church Street, Hebden Bridge Road (H821) (1.7ha) – 827m from South Pennine Moors SAC and SPA
- Dimples Lane (H293) (0.7ha) – 888m from South Pennine Moors SAC and SPA
- Valley Drive / Wheatley Lane (H378) (1.9ha) – 975m from South Pennine Moors SAC

6.6.36 In terms of nationally designated sites for biodiversity, the following variable sites under this option are within 1km of a SSSI or NNR:

- Stubbings Road (H55) (0.8ha) – 488m from Trench Meadows SSSI
- Green End Road (H297) (0.7ha) – 718m from South Pennine Moors SSSI
- Leeds Road (H355) (2.1ha) – 768m from South Pennine Moors SSSI
- Church Street, Hebden Bridge Road (H821) (1.7ha) – 827m from South Pennine Moors SSSI
- Dimples Lane (H293) (0.7ha) – 888m from South Pennine Moors SSSI
- Valley Drive / Wheatley Lane (H378) (1.9ha) – 975m from South Pennine Moors SSSI

6.6.37 The following variable sites under this option contain or are adjacent to ancient woodland:

- Windhill Woodland and former railway line (H1033) (11.8ha) – om from Thackley West Wood
- Long Lee Lane, Keighley (H489) (4.4ha) – adjacent to Park Wood
- Stubbings Road (H55) (0.8ha) – adjacent to Walker / Midgeley Woods
- Carr Bottom Road (H645) (0.2ha) – adjacent to Calverley / Lodge Woods

6.6.38 The following variable sites under this option overlap (>25%) with a priority habitat:

- Hainworth Road (H434) (0.5ha) – 100% overlap with deciduous woodland
- Damems Lane, Halifax Road, Keighley (H463) (2.5ha) – 100% overlap with deciduous woodland
- Baden Street (H317) (1.9ha) – 95% overlap with deciduous woodland
- Woodhouse Road, Keighley (H442) (1.1ha) – 93% overlap with deciduous woodland
- Land between Park Lane and KWVR, Keighley (H441) (2.4ha) – 88% overlap with deciduous woodland
- Higherwood Close, Keighley (H440) (1ha) – 72% overlap with deciduous woodland
- Primrose Street, Keighley (H438) (0.6ha) – 48% overlap with deciduous woodland

- Keighley Shann Reservoir, Shann Lane, Keighley (H460) (0.6ha) – 41% overlap with deciduous woodland
- Hainworth Lane / Halifax Road, Keighley (H436) (1.1ha) – 40% overlap with deciduous woodland
- Bramwell House, Park Lane, Keighley (H469) (0.2ha) – 40% overlap with deciduous woodland
- Windhill Woodland and former railway line (H1033) (11.8ha) – 38% overlap with deciduous woodland
- Briarwood Grove, Odsal (H1196) (1.1ha) – 32% overlap with deciduous woodland
- Holme Lane, Holmewood (H917) (0.8ha) – 31% overlap with deciduous woodland
- Close Head Lane (H1285) (1.6ha) – 25% overlap with deciduous woodland

6.6.39 In terms of locally designated sites for biodiversity, 23 sites are within 100m of an LWS.

6.6.40 Overall, it is considered that this option will ultimately lead to the loss of biodiversity in urban areas, which could be difficult to replace through on-site BNG delivery. As such, **minor negative effects** are anticipated. This is primarily as a result of the loss of areas of priority habitat and open greenspace. In this respect, this option has the potential to weaken urban ecological networks, with potentially adverse impacts on the resilience of habitats and species that form these networks. Conversely, this option would result in less pressure on sensitive locations outside of urban areas (albeit noting that there are several sites within proximity to the South Pennine Moors that could increase recreational pressures).

Landscape

6.6.41 Focusing on the potential impact of development on landscape character, eight variable sites are within 1km of a National Landscape. However, it is noted that these are mostly in the urban area. These sites are:

- Valley Drive / Wheatley Lane (H378) (1.9ha) – 80m from Nidderdale
- Manor Garth (H14) (2ha) – 422m from Nidderdale
- Sugar Hill (H13) (0.6ha) – 602m from Nidderdale
- Land to rear of primary school (H10) (0.9ha) – 721m from Nidderdale
- Main Street / Southfield Terrace (H2) (1.7ha) – 755m from Nidderdale
- Leeds Road (H355) (2.1ha) – 769m from Nidderdale
- East End Allotments, Oak Avenue (H116) (1.6ha) – 837m from Nidderdale
- Beanlands Parade (H370) (0.3ha) – 949m from Nidderdale

6.6.42 The following sites are within 1km of a National Park:

- Manor Garth (H14) (2ha) – 937m from the Yorkshire Dales

- Land to rear of primary school (H10) (0.9ha) – 942m from the Yorkshire Dales
- Sugar Hill (H13) (0.6ha) – 967m from the Yorkshire Dales

6.6.43 Eight of the variable sites under this option contain more than two TPOs, with one site – Sun Street, Haworth (H312) (1.2ha) – containing 24 TPOs.

6.6.44 In terms of landscape sensitivity, 12 of the variable sites under this option have a 'red' colour coding (medium-high landscape sensitivity), whilst 14 have an 'amber' colour coding (low-medium to medium landscape sensitivity).

6.6.45 This option has the potential to negatively impact landscape character, as a number of proposed sites are in areas with a medium-high landscape sensitivity. Potential impacts on the Nidderdale National Landscape are more uncertain, particularly given only one site is within very close proximity (<100m) to this designated landscape and this is within the existing urban area. Whilst this option does avoid edge of settlement impacts across the district, it will degrade the open nature of the urban area of Bradford, and this is considered to be a **moderate negative effect**.

RA2A – Urban edge expansion around Bradford

Biodiversity

6.6.46 Focusing first on internationally designated sites for biodiversity, none of the variable sites under this option are within 1km of a SAC, SPA or Ramsar site, and this option performs well in this respect.

6.6.47 In terms of nationally designated sites for biodiversity, only one variable site under this option is within 1km of a SSSI or NNR. This is Bankfield Farm, Nabwood (H1060) (1.6ha), which is 976m from Bingley South Bog.

6.6.48 The following variable sites under this option contain or are adjacent to ancient woodland:

- Windhill Woodland and former railway line (H1033) (11.8ha) – 38% overlap with Thackley West Wood
- Lower Fagley Lane, Fagley (H620) (7.9ha) – 2% overlap with Ravenscliffe Wood
- Bingley Road / Long Lane, Heaton (H712) (27.2ha) – 1% overlap with Royds Cliff Wood
- Land east of Ned Lane, Holmewood (H974) (15.3ha) – adjacent to Black Carr
- Carr Bottom Road (H645) (0.2ha) – adjacent to Calverley / Lodge Woods

6.6.49 The following variable sites under this option overlap (>25%) with a priority habitat:

- Cellow Dene Wood (H762) (4.2ha) – 77% overlap with deciduous woodland
- Land at Scarlet Heights (H1183) (0.2ha) – 69% overlap with deciduous woodland

- Hollin Hall Farm, High Bank Lane, Shipley (H1012) (4.2ha) – 48% overlap with deciduous woodland
- Huddersfield Road, Wyke (H886) (7.4ha) – 48% overlap with deciduous woodland
- Highfield, Huddersfield Road, Wyke (H916) (0.6ha) – 48% overlap with deciduous woodland
- Windhill Woodland and former railway line (H1033) (11.8ha) – 38% overlap with deciduous woodland

6.6.50 In terms of locally designated sites for biodiversity, 16 sites are within 100m of an LWS.

6.6.51 Overall, it is considered that this option will ultimately lead to the loss of biodiversity on the edge of urban area around Bradford City. However, unlike option RA1A and RA1B, on-site BNG delivery is more likely to be delivered through this option. As such, **minor negative effects** are predicted. This is primarily as a result of the loss / impact upon of areas of priority habitat and proximity to ancient woodland. Though BNG ought to be possible on site for larger greenfield sites, this option still has the potential to weaken urban-edge ecological networks, which could include adversely impacting the transition between urban and countryside habitats and species.

Landscape

6.6.52 Focusing on the potential impact of development on landscape character, none of the sites are within 1km of a National Landscape or National Park.

6.6.53 In terms of landscape sensitivity, ten of the variable sites under this option have a ‘red’ colour coding (medium-high landscape sensitivity), whilst 35 have an ‘amber’ colour coding (low-medium to medium landscape sensitivity).

6.6.54 None of the variable sites under this option contain more than two TPOs, with only four sites containing one to two TPOs.

6.6.55 This option has the potential to adversely impact landscape character, as a number of sites involved in this option are in areas with a medium-high landscape sensitivity. Cumulatively, the concentration of growth around the City could therefore lead to **moderate negative effects** in terms of landscape, potentially including coalescence between distinct built-up areas.

RA2B – Urban edge expansion across the District

Biodiversity

6.6.56 Focusing first on internationally designated sites for biodiversity, several of the variable sites under this option are within 1km of a SAC, SPA or Ramsar site, namely:

- Skipton Road (H358) (7.8ha) – 452m from South Pennine Moors SAC and SPA
- Land off Moorfield Road, Ben Rhydding (H374) (1.3ha) – 692m from South Pennine Moors SAC and SPA

- Land off Hard Ness Road, Hebden Bridge Road (H823) (0.5ha) – 701m from South Pennine Moors SAC and SPA
- Ilkley Road, Riddlesden, Keighley (H417) (8.3ha) – 723m from South Pennine Moors SAC and SPA
- Coutances Way (H360) (25.7ha) – 850m from South Pennine Moors SAC and SPA
- Ilkley Road, Riddlesden (Barley Cote Farm) (7ha) – 908m from South Pennine Moors SAC and SPA
- Street Lane (H295) (2.5ha) – 960m from South Pennine Moors SAC and SPA
- Banks Lane Riddlesden (H415) (2.1ha) – 972m from South Pennine Moors SAC and SPA
- Morton Lane / Hawthorne Way (H299) (3.9ha) – 988m from South Pennine Moors SAC and SPA

6.6.57 In terms of nationally designated sites for biodiversity, the following variable sites under this option are within 1km of a SSSI or NNR:

- Glen Road (H38) (5.1ha) – 167m from Trench Meadows SSSI
- Dowley Gap Lane (1) (H79) (0.8ha) – 259m from Bingley South Bog SSSI
- Dowley Gap Lane (3) (H82) (0.5ha) – 267m from Bingley South Bog SSSI
- Dowley Gap Lane (2) (H81) (3ha) – 286m from Bingley South Bog SSSI
- Sherrif Lane, Eldwick (2) (H74) (2.5ha) – 446m from Trench Meadows SSSI
- Skipton Road (H358) (7.8ha) – 452m from South Pennine Moors SSSI
- The Rowans (H29) (2.1ha) – 470m from Trench Meadows SSSI
- West Lane (H41) (8.1ha) – 624m from Trench Meadows SSSI
- Hazel Beck, Cottingley Bridge (H242) (4.8ha) – 628m from Bingley South Bog SSSI
- Primrose Lane, Gilstead (H85) (1.8ha) – 635m from Bingley South Bog
- Gilstead Lane (H75) (4.4ha) – 671m from Trench Meadows SSSI
- Land off Moorfield Road, Ben Rhydding (H374) (1.3ha) – 692m from South Pennine Moors SSSI
- Land off Hard Ness Road, Hebden Bridge Road (H823) (0.5ha) – 701m from South Pennine Moors SSSI
- West Lane (2) (H39) (7ha) – 719m from Trench Meadows SSSI
- West Lane (2) (H60) (2.9ha) – 719m from Trench Meadows SSSI
- Ilkley Road, Riddlesden, Keighley (H417) (8.3ha) – 723m from South Pennine Moors SSSI

- Coutances Way (H360) (25.7ha) – 850m from South Pennine Moors SSSI
- West Lane (H30) (8.3ha) – 882m from Trench Meadows SSSI
- West Lane (1) (H56) (1.8ha) – 882m from Trench Meadows SSSI
- Sherrif Lane, Eldwick (1) (H73) (10.6ha) – 903m from Trench Meadows SSSI
- Ilkley Road, Riddlesden (Barley Cote Farm) (H416) (7ha) – 908m from South Pennine Moors SSSI
- Street Lane (H295) (2.5ha) – 960m from South Pennine Moors SSSI
- Banks Lane Riddlesden (H415) (2.1ha) – 972m from South Pennine Moors SSSI
- West Lane (H1102) (0.4ha) – 974m from Trench Meadows SSSI
- Bankfield Farm, Nabwood (H1060) (1.6ha) – 976m from Bingley South Bog SSSI
- Morton Lane / Hawthorne Way (H299) (3.9ha) – 988m from South Pennine Moors SSSI

6.6.58 The following variable sites under this option contain or are adjacent to ancient woodland:

- Windhill Woodland and former railway line (H1033) (11.8ha) – 38% overlap with Thackley West Wood
- Hardings Lane (H365) (4.2ha) – adjacent to Stubham / Hudson Woods
- High Farm rear of Low Fell Close, Keighley (H486) (2ha) – adjacent to Lower Holme Wood
- Lower Fagley Lane, Fagley (H620) (7.9ha) – 2% overlap with Ravenscliffe Wood
- Bingley Road / Long Lane, Heaton (H712) (27.2ha) – 1% overlap with Royds Cliff Wood
- Chellow Dene Wood (H762) (4.2ha) – overlaps 77% with Chellow Dean
- Land east of Ned Lane, Holmewood (H974) (15.3ha) – adjacent to Black Carr
- Carr Bottom Road (H645) (0.2ha) – adjacent to Calverley / Lodge Woods
- Spring Lane, Eldwick (H72) (5.8ha) – adjacent to Walker / Midgeley Woods
- Sherrif Lane, Eldwick (1) (H73) (10.6ha) – adjacent to Walker / Midgeley Woods

6.6.59 The following variable sites under this option overlap (>25%) with a priority habitat:

- Rear of Merlinwood Drive (H37) (2.8ha) – 100% overlap with lowland meadows

- Bradford Road, Sandbeds, Keighley (H421) (1.5ha) – 100% overlap with deciduous woodland
- Land at Hainworth Road (Cragg Hill Farm) (H485) (1ha) – 87% overlap with deciduous woodland
- Hazel Beck, Cottingley Bridge (H242) (4.8ha) – 85% overlap with lowland meadows
- Morton Hall, Morton Lane (H296) (2.6ha) – 77% overlap with deciduous woodland
- Brow Top Road, Haworth (H316) (0.4ha) – 77% overlap with upland heathland
- Chellow Dene Wood (H762) (4.2ha) – 77% overlap with deciduous woodland
- Land at Scarlet Heights (H1183) (0.2ha) – 69% overlap with deciduous woodland
- Hollin Hall Farm, High Bank Lane, Shipley (H1012) (4.2ha) – 48% overlap with deciduous woodland
- Huddersfield Road, Wyke (H886) (7.4ha) – 48% overlap with deciduous woodland
- Highfield, Huddersfield Road, Wyke (H916) (0.6ha) – 48% overlap with deciduous woodland
- Windhill Woodland and former railway line (H1033) (11.8ha) – 38% overlap with deciduous woodland
- Spring Lane, Eldwick (H72) (5.8ha) – 27% overlap with deciduous woodland

6.6.60 In terms of locally designated sites for biodiversity, 55 sites are within 100m of an LWS.

6.6.61 Overall, it is considered that this option could lead to cumulative impacts on biodiversity in Addingham, Burley and Ilkley, which are more sensitive to growth pressures beyond the site level. As such, **moderate negative effects** are anticipated.

6.6.62 However, there is potential for this to be mitigated through on-site BNG delivery, which is more readily achievable on urban-edge sites compared to inner urban area sites.

6.6.63 Whilst numerous variable sites under this option are constrained by biodiversity designations, it is noted that not all sites considered through this option would need to be carried forward and so major negative effects could be avoided. Nevertheless, this option has the potential to weaken ecological networks on the urban edges, which could include adversely impacting the transition between urban and countryside habitats and species (including directing more growth towards the more sensitive northern and western locations).

Landscape

6.6.64 Focusing on the potential impact of development on landscape character, the following sites are within 1km of a National Landscape:

- Hardings Lane (H365) (4.2ha) – 11m from Nidderdale
- Wheatley Lane, Ben Rhydding (H359) (1.3ha) – 46m from Nidderdale
- Coutances Way (H360) (25.7ha) – 58m from Nidderdale
- Main Street / A65 (H115) (2ha) – 86m from Nidderdale
- Main Street (H4) (4.6ha) – 334m from Nidderdale
- Main Street (H6) (4.7ha) – 344m from Nidderdale
- Main Street (H7) (0.4ha) – 344m from Nidderdale
- Main Street (H8) (0.8ha) – 389m from Nidderdale
- Stockinger Lane (H5) (3.1ha) – 520m from Nidderdale
- Main Street / Addingham Bypass (H3) (17.4ha) – 749m from Nidderdale
- Skipton Road (H358) (7.8ha) – 951m from Nidderdale

6.6.65 None of the variable sites under this option are within 1km of a National Park.

6.6.66 In terms of landscape sensitivity, 98 of the variable sites under this option have a 'red' colour coding (medium-high landscape sensitivity), whilst over 100 have an 'amber' colour coding (low-medium to medium landscape sensitivity).

6.6.67 Eight of the variable sites under this option contain more than two TPOs, with one site – Alderscholes Lane (H1307) (3.6ha) – containing 17 TPOs.

6.6.68 This option has the potential to impact landscape character, including the Nidderdale National Landscape and areas with an identified medium-high landscape sensitivity. Whilst the impacts would be somewhat dispersed across the district (and some of the more constrained sites could be avoided), some of the more sensitive settlements would likely be affected, and therefore, **moderate negative effects** are predicted.

RA2C - Urban edge expansion without reliance on Regeneration Areas

6.6.69 Effects under this option are anticipated to be similar to those noted for option RA2B, but more sites would be planned for release as there would be less reliance on regeneration areas. Therefore, some of the more sensitive sites might be needed / cumulative effects could increase. For both biodiversity and landscape, this potentially increases the significance of effects. Reflecting this, **major negative effects** are predicted at this stage.

RA3A: Grey Belt-led strategy

Biodiversity

6.6.70 Focusing first on internationally designated sites for biodiversity, several of the variable sites under this option are within 1km of a SAC, SPA or Ramsar site, namely:

- Land off Moorfield Road, Ben Rhydding (H374) (1.3ha) – 692m from South Pennine Moors SAC and SPA
- Land off Hard Ness Road, Hebden Bridge Road (H823) (0.5ha) – 701m from South Pennine Moors SAC and SPA
- Coutances Way (H385) (7.4ha) – 850m from South Pennine Moors SAC and SPA
- Street Lane (H295) (2.5ha) – 960m from South Pennine Moors SAC and SPA

6.6.71 In terms of nationally designated sites for biodiversity, the following variable sites under this option are within 1km of a SSSI or NNR:

- Dowley Gap Lane (1) (H79) (0.8ha) – 259m from Bingley South Bog SSSI
- Woodley Close (H623) (1.2ha) – 262m from Yeadon Brickworks & Railway Cutting SSSI
- Sherrif Lane, Eldwick (2) (H74) (2.5ha) – 446m from Trench Meadows SSSI
- Hazel Beck, Cottingley Bridge (H242) (4.8ha) – 628m from Bingley South Bog SSSI
- Land off Moorfield Road, Ben Rhydding (H374) (1.3ha) – 692m from South Pennine Moors SSSI
- Land off Hard Ness Road, Hebden Bridge Road (H823) (0.5ha) – 701m from South Pennine Moors SSSI
- Coutances Way (H385) (7.4ha) – 850m from South Pennine Moors SSSI
- Sherrif Lane, Eldwick (1) (H73) (10.6ha) – 903m from Trench Meadows SSSI
- Street Lane (H295) (2.5ha) – 960m from South Pennine Moors SSSI
- West Lane (H1102) (0.4ha) – 974m from Trench Meadows SSSI
- Bankfield Farm, Nabwood (H1060) (1.6ha) – 976m from Bingley South Bog SSSI

6.6.72 The following variable sites under this option contain or are adjacent to ancient woodland:

- Land south of Skipton Road (H1128) (6.7ha) – adjacent to Currer Wood
- Lower Fagley Lane, Fagley (H620) (7.9ha) – 1% overlap with Ravenscliffe Wood
- Chellow Dene, Bradford (H703) (13ha) – 2% overlap with Chellow Dean
- Bingley Road / Long Lane, Heaton (H712) (27.2ha) – 1% overlaps with Royds Cliff Wood
- Land behind Meadowbank Avenue, West of Canford Road, Allerton (H735) (2.1ha) – adjacent to Chellow Dean
- Bingley Road / Long Lane, Heaton (H780) (20.3ha) – 1% overlap with Royds Cliff Wood

- Hudson View (H924) (5.3ha) – adjacent to Old Hanna / Low Woods
- Sherrif Lane, Eldwick (1) (H73) (10.6ha) – adjacent to Walker / Midgeley Woods

6.6.73 The following variable sites under this option overlap (>25%) with a priority habitat:

- Rear of Merlinwood Drive (H37) (2.8ha) – 100% overlap with lowland meadows
- Hazel Beck, Cottingley Bridge (H242) (4.8ha) – 85% overlap with lowland meadows
- Hollin Hall Farm, High Bank Lane, Shipley (H1012) (4.2ha) – 48% overlap with deciduous woodland
- Huddersfield Road, Wyke (H886) (7.4ha) – 48% overlap with deciduous woodland
- Highfield, Huddersfield Road, Wyke (H916) (0.6ha) – 48% overlap with deciduous woodland

6.6.74 In terms of locally designated sites for biodiversity, 46 sites are within 100m of an LWS.

6.6.75 Overall, it is considered that this option could lead to cumulative impacts on biodiversity in Addingham, Burley and Ilkley. As such, **moderate negative effects** are anticipated. However, there is potential for this to be mitigated through on-site BNG delivery, which is more readily achievable on grey belt sites compared to inner urban area sites. Whilst numerous variable sites under this option are constrained by biodiversity designations, it is noted that not all sites considered through this option will be carried forward. Nevertheless, this option has the potential to weaken ecological networks in the countryside, which is generally where more sensitive habitats and species are located in Bradford. There will also be some impacts on the edge of Bradford City and overall ecological connectivity could be affected.

Landscape

6.6.76 Focusing on the potential impact of development on landscape character, the following sites are within 1km of a National Landscape:

- Great Pasture Lane (H119) (18.3ha) – 70m from Nidderdale
- Bolton Road (H11) (1.4ha) – 176m from Nidderdale
- Coutances Way (H385) (7.4ha) – 215m from Nidderdale
- Main Street (H6) (4.7ha) – 344m from Nidderdale
- Main Street (H7) (0.4ha) – 344m from Nidderdale
- Main Street (H8) (0.8ha) – 389m from Nidderdale
- Stockinger Lane (H5) (3.1ha) – 520m from Nidderdale
- Land off Moorfield Road, Ben Rhydding (H374) (1.3ha) – 574m from Nidderdale

6.6.77 None of the variable sites under this option are within 1km of a National Park.

6.6.78 In terms of landscape sensitivity, 71 of the variable sites under this option have a 'red' colour coding (medium-high landscape sensitivity), whilst over 100 have an 'amber' colour coding (low-medium to medium landscape sensitivity). Therefore, there is considerable flexibility to avoid the most significant constraints.

6.6.79 Four of the variable sites under this option contain more than two TPOs, but none contain more than six.

6.6.80 This option has the potential to impact landscape character, including the Nidderdale National Landscape and areas with an identified medium-high landscape sensitivity. Despite this, it is noted that there is a substantial number of sites that are of 'amber' sensitivity. Nonetheless, a large amount of the sites are sensitive to change, and despite there being a degree of choice, **minor negative effects** are still noted under this option.

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

6.6.81 Effects under this option are anticipated to be similar to those highlighted under option RA3A. However, as there would be a need for more sites to be released, some of the more sensitive sites may need to be included under this option. There is also an assumption that more greenfield release would be planned for. In this respect, **major negative effects** could come forward for biodiversity if growth is dispersed to sensitive locations and / or if it results in impacts on connectivity and urban fringe environments.

6.6.82 For landscape, most of the grey belt sites could be selected with a lower landscape sensitivity, but the higher presumption of growth on grey belt would be more likely to lead to cumulative **moderate negative effects**, and would also reduce flexibility to avoid the more sensitive locations (compared to option RA3A).

Comparison of options (Biodiversity)

6.6.83 Option RA1A is considered to perform most favourably overall. This is because it directs growth to inner urban areas and is therefore less likely to impact biodiversity in the more constrained urban edge and countryside. Nevertheless, it is recognised that this option still has potential to impact urban ecological networks, although this will be mitigated to some degree by the delivery of BNG and green infrastructure.

6.6.84 Minor negative effects are anticipated across three options – the preferred strategy and options RA1B and RA2A. The preferred strategy delivers some growth within proximity to the South Pennine Moors which is an internationally and nationally designated site for biodiversity (SAC, SPA and SSSI). Option RA2A would lead to the loss of biodiversity (primarily areas of priority habitat) on the edge of urban areas. However, unlike option RA1A and RA1B, on-site BNG delivery is more likely to be delivered through this option. Finally, option RA2A would lead to the loss of biodiversity (again, primarily areas of priority habitat) on the edge of urban areas. Similarly, on-site BNG delivery is more likely to be delivered through this option.

6.6.85 Moderate negative effects are considered likely for options RA2B and RA3A. For both options, this is because cumulative impacts on biodiversity are anticipated in Addingham, Burley and Ilkley, which are more sensitive to growth pressures beyond the site level.

6.6.86 Major negative effects are predicted for options RA2C and RA3B. For these options, adverse impacts are considered greater than under options RA2B and RA3B as they do not rely on regeneration areas. As such, there would be a need for more sites to be released, which could include some of the more sensitive sites from a biodiversity standpoint. There is also an assumption that more greenfield release would be planned for under these options, and therefore they have greater potential to impact ecological networks across the district.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
-	+	-	-	--	---	--	---

Comparison of options (Landscape)

6.6.87 Neutral effects are noted under option RA1A as this option is unlikely to adversely impact landscape character. Instead, it could lead to enhancements via green infrastructure delivery and urban regeneration particularly in existing settlement areas. However, given that housing needs would not be met in full, there would be a risk that ad hoc growth could occur in more sensitive locations, which moderates the overall effects somewhat.

6.6.88 Minor negative effects are considered likely under option RA3A. This is because this option has the potential to impact landscape character, including the Nidderdale National Landscape and areas with an identified medium-high landscape sensitivity. Despite this, it is noted that there is a wider range of sites of lower sensitivity that could be selected.

6.6.89 Moderate negative effects are predicted across the majority of the options, including the preferred option, RA1B, RA2A, RA2B, and RA3B. Regarding the preferred option, this is because it would involve a level of Green Belt release. However, this is selective, and therefore impacts are deemed minor given that dispersal to sensitive locations is somewhat more limited.

6.6.90 Moving on to option RA1B, this is because several proposed sites are in areas with a medium-high landscape sensitivity. However, potential impacts on the Nidderdale National Landscape are more uncertain. Whilst this option does avoid edge of settlement impacts across the district, it will degrade the open nature of the urban area of Bradford.

6.6.91 In terms of option RA2A, several sites are in areas with a medium-high landscape sensitivity, and cumulative effects could arise as a result of the concentration of growth around the City.

6.6.92 Concerning option RA2B, this reflects the potential to impact landscape character, including the National Landscape and areas with an identified medium-high landscape sensitivity. Whilst the impacts would be somewhat dispersed across the district (and some of the more constrained sites could be avoided), some of the more sensitive settlements could be affected.

6.6.93 Finally, regarding option RA3B most of the grey belt sites are of a lower landscape sensitivity, but the higher presumption of growth on grey belt would be more likely to lead to cumulative effects.

6.6.94 Major negative effects are noted for option RA2C because unlike option RA2B, more sites would be planned for release as there would be less reliance on regeneration areas. Therefore, some of the more sensitive sites might be needed / cumulative effects could increase.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
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6.7 Built environment

IA objectives

- **(7a)** To sustain and, where appropriate, enhance the significance of heritage assets and their setting.
- **(7b)** To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes.

Implications of the constants

6.7.1 The constants include 10 sites that are within the Saltaire World Heritage Site (WHS) buffer zone. These are:

- Carr Lane (H1011) (1.3ha)
- Shipley Hospital (H1030) (0.2ha)
- Old Mill House, Dockfield Road (H1037) (0.5ha)
- East Victoria Street (H1044) (0.4ha)
- Regent House (H1047) (0.7ha)
- Land between Leeds Road and Dock Lane (H1052) (0.7ha)
- Wrose Brow Road, Windhill (H1055) (2ha)
- Queens Road / Ferncliffe Road – Saltaire (H1061) (0.9ha)
- West Lane (H28) (0.8ha)
- Cliffe Lane West (H57) (0.6ha)

6.7.2 Two sites are within 200m of a Scheduled Monument:

- Stockheld Road (H386) (0.2ha) – 34m from 'Old Bridge'
- Church Street / Main Street (H26) (0.2ha) – 106m from 'Anglo-Saxon cemetery and medieval manorial centre including fishponds and part of the open field system adjacent to St Peter's Church'

6.7.3 Eight sites are within 200m of a registered park and garden:

- Cousen Road (H1274) (0.5ha) – 3m from Grade II listed Horton Park
- Lister Lane (H670) (3m from Grade II* listed Peel Park
- Exmouth Place (H598) (4.4ha) – 25m from Grade II* listed Peel Park
- Flockton Road (H932) (0.5ha) – 82m from Grade II listed Bowling Park
- Ivy Bank Lane (H311) (1.2ha) – 92m from Grade II listed Central Park, Haworth
- Flockton Road (H931) (0.6ha) – 114m from Grade II listed Bowling Park
- Former Branshaw Special School, Nashville Street (H559) (0.5ha) – 120m from Grade II listed Lund Park
- Canterbury Youth Centre, Dawnay Road, Canterbury (H1243) (0.5ha) – 187m from Grade II listed Horton Park

6.7.4 Several sites would be within 50m of a listed building, most notably:

- Sty Lane (H105) (16.6ha) – contains Grade II listed 'Laythorpe Farmhouse and attached barn'
- Former Hare and Hounds pub, Great Horton Road (H1227) (0.4ha) – contains Grade II listed 'The Hare and Hounds Public House'
- Dole and Prospect Mills, Thornton Road (H1323) (1.2ha) – contains Grade II listed '285 and 287, Thornton Road BD13' and 'Prospect Mill'
- City Village Top of Town (H220) (2.6ha) – contains Grade II listed 'Fountain Hall, United Reform Chapel'
- Midland Mills, Valley Road (H235) (1ha) – contains Grade II listed 'Ambler Mill and Midland Mills Warehouses'
- Wapping Road (H597) (0.5ha) – contains Grade II listed 'Wapping Road School with attached steps and boundary walls' and 'School House at Wapping Road School'
- Drummond Trading Estate, Lumb Lane (H781) (3ha) – contains Grade II listed 'Main Block of 3 Storey Warehouse, 5 Storey Spinning Mill and Spinning Shed at Drummond's Mill Engine House and Chimney South of 5 Storey Block at Drummond's Mill'
- Former Reservoir and Derelict Pumping Station, Carlilse Road (H782) (1.1ha) – contains Grade II listed '34, Bavaria Place BD8'
- Allerton Mills (H789) (1.2ha) – contains Grade II listed 'Two 4 Storey Blocks to Numbers 262 and 264 (Allerton Warehouse)'
- Spen View Lane / Shetcliffe Lane, Bierley (H879) (1.6ha) – contains Grade II listed 'Lockwood Farmhouse'
- Grammar School Street (H127) (0.5ha) – 7m from Grade II listed '32, Manor Row BD1'
- Abb Scott Lane, Low Moor (H1263) (6.8ha) – 8m from Grade II listed '1, Abb Scott Lane'
- Land and buildings south of Sunbridge Road (H218) (0.6ha) – 8m from '147, 149 and 151, Sunbridge Road BD1'
- Cathedral Quarter B (H233) (0.3ha) – 8m from Grade II listed 'The Ring O' Bells Public House'
- Regent House (H1047) (0.7ha) – 10m from Grade II listed 'Leeds and Liverpool Canal, Canal Bridge number 208…'
- Prospect Road (H683) (0.5ha) – 10m from Grade II listed 'School House at Wapping Road School'
- Hill Top Road (H1321) (0.5ha) – 11m from Grade II listed 'Thompson Square'
- Back Fold, Clayton (H1248) (1.6ha) – 15m from Grade II listed 'Town Bottom Farmhouse and adjoining barn to east'

6.7.5 In addition to the above, it is noted that there would be 45 sites within 200m of a conservation area, as well as 11 sites within 200m of a locally listed building.

6.7.6 Finally, it is recognised that much of the growth through the constant sites is committed and coming forward irrespective of the plan. Furthermore, much of the growth would be permitted under the assumption in favour of sustainable development. Nonetheless, there are clear pressures and opportunities for enhancement associated with urban focused growth across the district.

Preferred Option

6.7.7 The following site falls within the Saltaire WHS buffer zone:

- Bingley Road, Nabwood (H1059) (5.3ha)

6.7.8 Only one site is within 200m of a Scheduled Monument – High Stead, Street Lane (H306) (0.8ha), which is 82m from 'Cup, ring and groove marked rock at the base of a wall between East Morton and West Morton'.

6.7.9 In addition, one site is within 200m of a registered battlefield – Raikes Lane, East of Holmewood Estate (H911) (44.2ha), which is 60m from the Adwalton Moor Historic Battlefield.

6.7.10 Only one site is within 200m of a registered park and garden – Hollins Lane, Utley (H388) (4.1ha), which is adjacent to the Grade II listed Whinburn Registered Park and Garden.

6.7.11 Several sites would be within 50m of a listed building, most notably:

- Albert Road, Brighouse and Denholme Road (H868) (0.7ha) – adjacent to Grade II listed 'Milepost opposite junction with New Park Road'
- Land off Buckingham Crescent, Clayton (H1270) (11.8ha) – 3m from Grade II listed '176-182, Bradford Road'
- North Cliffe Lane (H1301) (2ha) – 9m from Grade II listed 'Grandage Gate Farmhouse and adjoining barn'
- Ned Lane, Holmewood (H979) (2.9ha) – 9m from Grade II listed '25, Ned Lane'
- Thornton Road (H1320) (0.5ha) – 11m from Grade II listed 'Stocks to east of Thornton Hall'
- Holme Lane / Raikes Lane, Holmewood (H894) (1ha) – 14m from Grade II listed 'Ryecroft Farm'

6.7.12 In addition to the above, it is noted that there would be 18 sites within 200m of a conservation area, as well as four sites within 200m of a locally listed building.

6.7.13 Overall, the preferred option is considered likely to lead to **minor negative effects** on the built environment. This is largely due to the proximity of certain variable sites to designated and non-designated heritage assets, including one site within the Saltaire WHS, and a further large (>20ha) site within proximity. As such, there is potential for the setting and significance of the WHS to be impacted through development under this option. Several sites are within close proximity to listed buildings, and could therefore affect the setting of these – but direct loss would be avoided.

6.7.14 It is also noted that all but one of the variable sites are greenfield, and therefore potential exists to impact the setting and significance of heritage assets, as well as townscape character more broadly.

RA1A – Urban intensification through previously developed land

6.7.15 Development through this approach will deliver residual growth on eight sites that are within the Saltaire WHS buffer zone. These are:

- Neville Grange Nursing Home site (H1537)
- Dockfield Road (H1007) (3.6ha) – western part of the site
- Lower Holme Mill, Otley Road (H1009) (0.2ha)
- Otley Road (H1010) (0.5ha)
- Land to rear of Aldi and McDonalds (H1034) (0.8ha)
- Crag Road (H1046) (5ha)
- West Lane (H41) (8.1ha)
- Idle Hill Reservoir (H603) (1.9ha)

6.7.16 One site would be within 200m of a Scheduled Monument – West Lane (H41) (8.1ha) would be 152m from 'Rock with single cup mark south of Dobrudden caravan park'.

6.7.17 Another site would be within 200m of a registered park and garden – All Saints Road (H1272) (1.2ha) would be 69m from Grade II listed Horton Park).

6.7.18 Several sites would be within 50m of a listed building, most notably:

- Feversham Street (H204) (0.3ha) – contains Grade II* 'Feversham Street First School'
- Dalton Mills, Dalton Lane, Keighley (H411) (1.3ha) – contains Grade II* 'Dalton Mills, all attached buildings and yard surface'
- Southfield Care Home (H1244) (0.3ha) – contains Grade II listed 'Main block to Southfield Junior Immigrant Education Centre'
- Bell House, Southfield Lane (H1278) (0.2ha) – contains Grade II listed 'Premises occupied by Hire Power Limited'
- Harclo Road, Keighley (H412) (1.7ha) – contains Grade II listed 'Aireworth Mill'
- Land to rear of Aldi and McDonalds (H1034) (0.8ha) – 7m from Grade II listed 'Leeds and Liverpool Canal…'
- Paradise Fold, Great Horton (H1264) (0.2ha) – 11m from Grade II listed '19 and 21, Paradise Fold'
- Walk Mills, The Walk, Keighley (H548) (1.7ha) – 12m from Grade II listed 'Low bridge at junction of Coney Lane, Park Lane and Long Croft'
- Burnett Street Car Park (H227) (0.3ha) – 16m from Grade II listed 'Premises occupied by Textile Yarns and La Parsons and Company Limited (College Mill)'

- Cullingworth Mill (H270) (1.2ha) – 17m from 'Boundary wall railings and gates at Cullingworth Baptist Church'

6.7.19 In addition to the above, it is noted that there would be 27 sites within 200m of a conservation area, as well as three sites within 200m of a locally listed building.

6.7.20 Given that this option would intensify development on sites and regeneration areas within an urban setting, it is possible that **minor positive effects** could be achieved. For example, intensifying development and regenerating sites (and areas identified within Bradford, Keighley and Shipley) reduces the amount of undeveloped land taken forward to support growth across Bradford. Not only does this help to reinforce established settlement patterns across the district (and thus contribute positively towards settlement character and quality), but it is also anticipated to result in reduced numbers of designated and non-designated heritage assets, areas and features outside of the existing urban area being impacted by development due to changes to their setting and / or significance. Furthermore, regenerating sites through this approach offers the potential to enhance the historic environment and townscape character and quality, through improving visual amenity within the urban environment.

6.7.21 However, it is noted that increasing densities may affect the visual amenity of sites and impact upon the setting of nearby heritage assets. This is in addition to the character of the local area through changes to views or bringing forward development that is out of character with the existing streetscape and development. This is particularly important where sites and regeneration areas are located within proximity to conservation areas, such as Keighley Town Centre, which contribute towards the townscape character of settlements.

6.7.22 Several sites contain listed buildings, which provides potential for direct negative effects should these be lost, but it is also the case that such assets could form a feature of new development and find active uses. On balance, positive effects are considered more likely.

RA1B – Urban intensification through additional urban sites

6.7.23 Development through this approach would deliver growth on eight sites that are within the Saltaire WHS buffer zone, namely:

- Leeds Road / Thackley Old Road (H1008) (0.5ha)
- Belmont Terrace (H1031) (0.4ha)
- Windhill Woodland and former railway line (H1033) (11.8ha) – western part of the site
- Carr Lane (H1053) (0.9ha)
- Wycliffe Road (H1057) (1.4ha)
- Ferniehurst Farm (H32) (0.6ha)
- Stubbings Road (H55) (0.8ha)
- Green Lane (H58) (1ha)

6.7.24 One site would be within 50m of a scheduled monument – Belmont Terrace (H1031) (0.4ha) which would be 28m from 'Cup marked rock 60m south west of the Warm Memorial at Crowgill Park'.

6.7.25 Seven sites would be within 200m of a registered park and garden:

- Heaton Service reservoir, North Park Road, Heaton (H724) (4.6ha) – 15m from Grade II listed Lister Park
- Exmouth Place (H684) (3.8ha) – 28m from Grade II* listed Peel Park
- Off Manningham Lane, Manningham (H714) (0.5ha) – 43m from Grade II listed Lister Park
- Hollins Lane, Keighley (H535) (0.5ha) – 65m from Whinburn
- Mytholmes Lane Haworth (H322) (3ha) – 155m from Grade II listed Central Park, Haworth
- Greenfield Farm (H328) (1.2ha) – 173m from Grade II listed Central Park, Haworth
- Keighley Shann Reservoir, Shann Lane, Keighley (H460) (0.6ha) – 191m from Grade II listed Whinburn

6.7.26 Several sites would be within 50m of a listed building, most notably:

- Cemetery Road (H1159) (2.7ha) – contains Grade II listed 'Sams Mill by Middle Brook'
- Exley Road / Oakworth Road, Keighley Road (H536) (5.4ha) – contains along its boundary the Grade II listed 'Base of cross at junction with Wheat Head Lane'
- Lower Woodlands Farm, Oakenshaw (H895) (6.6ha) – contains Grade II listed 'Barn to east of Lower Woodlands Farmhouse, Lower Woodlands Farmhouse'
- Manor Garth (H14) (2ha) – 6m from Grade II listed 'The Manor House'
- Simpsons Green (H682) (1.6ha) – 9m from Grade II listed '287, Apperley Road'
- Hill Top Road (H1290) (1.3ha) – 11m from Grade II listed 'Thompson Square'
- Hill Top Road (H1291) (2.1ha) – 13m from Grade II listed '9 and 11, Hill Top Road'
- Hill Top Road (H1322) (1.3ha) – 13m from Grade II listed '9 and 11, Hill Top Road'
- Waterwheel Lane (H799) (1.4ha) – 13m from Grade II listed '1-47, Bridge Street'
- Church Street, Hebden Bridge Road (H821) (1.7ha) – 13m from Grade II listed '13, 15, 17 and 19, Hebden Bridge Road'
- Belmont Terrace (H1031) (0.4ha) – 15m from Grade II listed 'Church of St Paul'

6.7.27 In addition, there would be 51 sites within 200m of a conservation area, as well as 17 sites within 200m of a locally listed building.

6.7.28 Similarly to option RA1A, this approach to growth would intensify development on sites within an urban setting, and within the Regeneration Areas identified in Bradford, Shipley and Keighley, with similar positive effects anticipated in this respect. There is also a focus on regenerating mixed-use sites, which could deliver built environment benefits through enhancing the visual quality of the sites, to the benefit of enhancing townscape character and quality and historic environment settings. The same opportunities are likely to be present for the identified regeneration areas.

6.7.29 Furthermore, by incorporating greenfield sites into the approach, it is considered that growth would be distributed well to avoid increasing pressure in more constrained and sensitive locations on the urban fringes. However, it is also recognised that greenfield development could result in adverse impacts to the built environment through developing open sites that contribute to townscape character and quality, sense of place, and the settings of designated and non-designated historic environment features. This is likely given that there are several sites within close proximity to listed buildings and many within Conservation Areas. On balance, minor **negative effects** are anticipated under this option.

RA2A – Urban edge expansion around Bradford

6.7.30 Development through this approach will deliver growth on five sites that are within the Saltaire WHS buffer zone, namely:

- Dockfield Road (H1007) (3.6ha) – western part of the site
- Hollin Hill Farm, High Bank Lane, Shipley (H1012) (4.2ha)
- Windhill Woodland and former railway line (H1033) (11.8ha) – western part of the site
- Carr Lane (H1053) (0.9ha)
- Bankfield Farm, Nabwood (H1060) (1.6ha)

6.7.31 One site would be adjacent to a registered battlefield – West Gate Hill Street (1) (H891) (1.2ha), which would be adjacent to ‘Battle of Adwalton Moor 1643’.

6.7.32 Several sites would be within 50m of a listed building, most notably:

- Langberries, Clayton Heights (H1143) (16.1ha) – contains Grade II listed ‘Langberries Farmhouse’
- Mitchell Lane, Thackley (H613) (5.9ha) – contains Grade II listed ‘Farm Cottage, Simpson Green Farmhouse…’
- Lower Fagley Lane, Fagley (H620) (7.9ha) – contains Grade II listed ‘Ravenscliff Farmhouse and adjoining barn’
- Wilsden Road, Sandy Lane (H692) (13.8ha) – contains Grade II listed ‘Bothy at roadside on east side of yard of Upper Swain Royd Farm…’

- Holme Farm, Holme Lane, Holmewood (H896) (1.1ha) – contains Grade II listed 'Holme Farmhouse'
- Carr House Gate (H900) (4.9ha) – 2m from Grade II listed '109, 111 and 113, Carr House Gate'
- Park Road, Thackley (H619) (2ha) – 3m from Grade II listed '47-53, Park Road'
- Ainsbury Avenue, Thackley (H622) (0.4ha) – 4m from Grade II listed 'North Hall Farmhouse'
- Land off Buckingham Crescent, Clayton (H1204) (13.2ha) – 6m from Grade II listed '160-164, Bradford Road'
- Town End Road, Clayton (H1137) (1.8ha) – 9m from Grade II listed 'Maltkilm House'
- Glenview Close Nab Wood (H1015) (1.8ha) – 14m from Grade II* listed 'Barn immediately east of New Close Farmhouse'
- Land west of Ned Lane, Holmewood (H996) (2ha) – 35m from Grade II listed 'Numbers 18 and 20 and Adjoining Barn'

6.7.33 In addition, there would be 14 sites within 200m of a conservation area.

6.7.34 Development focused on the urban edges of Bradford would reduce the likelihood of adverse effects coming forward at other settlements, given growth would largely be centred on the regional city (as well as regeneration areas within Keighley and Shipley). As such, this would likely help retain existing townscape character and quality, and the historic environment, of the other settlements in the district, and could allow for heritage and townscape mitigation measures to be targeted.

6.7.35 However, this approach to growth could contribute to the erosion of the settlement character on the periphery of Bradford via changes to townscape character and quality, and the sense of place of the regional city. For example, important views from the edge of Bradford could be disrupted. Furthermore, the historic environment could be adversely impacted through changes to the setting of heritage assets on the urban edge of Bradford, which would likely experience more acute changes. Though listed buildings would likely not be directly lost to growth, the potential for negative effects on setting are heightened given that several of these are farmhouses that rely on a rural setting. Overall, it is considered that **minor negative effects** are likely to arise through this option.

RA2B – Urban edge expansion across the District

6.7.36 Development through this approach will deliver growth on 19 sites that are within the Saltaire WHS buffer zone, most notably:

- Dockfield Road (H1007) (3.6ha) – western part of the site
- Lower Holme Mill, Otley Road (H1009) (0.2ha)
- Otley Road (H1010) (0.5ha)
- Hollin Hall Farm, High Bank Lane, Shipley (H1012) (4.2ha)

- Windhill Woodland and former railway line (H1033) (11.8ha) – western part of the site
- Carr Lane (H1053) (0.9ha)
- Bankfield Farm, Nabwood (H1060) (1.6ha)
- West Lane (H1102) (0.4ha)
- The Rowans (H29) (2.1ha)
- West Lane (H30) (8.3ha)
- Glen Road (H38) (5ha)
- West Lane (2) (H39) (7ha)
- Green Lane / Hope Lane (H40) (1.7ha)
- West Lane (H41) (8.1)
- West Lane (1) (H56) (1.8ha)
- West Lane (2) (H60) (2.9ha)
- Sherrif Lane, Eldwick (2) (H74) (2.5ha)
- Gilstead Lane (H75) (4.4ha)
- Primrose Lane, Gilstead (H85) (1.8ha)

6.7.37 Eight sites would be adjacent or within 50m of a scheduled monument, namely:

- West Lane (H30) (8.3ha) – contains: 'Cup marked rock 180m north of covered reservoir at Baildon'.
- Carr Bank, Riddlesden (H540) (5.3ha) – contains along its boundary: 'Carved rock on bank of How Beck, east of path from West Morton to Riddlesden and 440m south west of Barn House Farm'.
- Ilkley Road Riddlesden (H532) (14.6ha) – 4m from 'Carved rock on bank of How Beck, east of path from West Morton to Riddlesden and 440m south west of Barn House Farm'.
- Spring Lane, Eldwick (H72) (5.8ha) – 8m from 'Cup-marked rock west of confluence of Lodepit Beck and Glovershaw Beck'.
- Shay Lane (H1336) (5.3ha) – 10m from 'Late prehistoric enclosed settlement 150m north of Shaygate Farm, Wilsden'.
- Glen Road (H38) (5.1ha) – 11m from 'Carved bedrock close to road north east of the public toilets on Brackhen Hall Green'.
- Land to south of West Morton (H488) (15.9ha) – 12m from 'Carved rock on bank of How Beck, east of path from West Morton to Riddlesden and 440m south west of Barn House Farm'.
- Sherrif Lane, Eldwick (1) (H73) (10.6ha) – 25m from 'Cup-marked rock west of confluence of Lodepit Beck and Glovershaw Beck'

6.7.38 One site would overlap with a registered battlefield – West Gate Hill Street (1) (H891), which would overlap with Adwalton Moor Historic Battlefield.

6.7.39 Six sites would be within 200m of a registered park and garden, namely:

- Hollins Lane (H389) (3.7ha) – adjacent to Grade II listed Whinburn
- West of Heights Lane, Eldwick (H107) (0.8ha) – adjacent to Grade II listed Prince of Wales Park
- Harden Road, Harden (H342) (3.2ha) – 14m from Grade II listed St Ives Estate
- West of Heights Lane, Eldwick (H94) (2.4ha) – 50m from Grade II listed Princes of Wales Park
- Weavers Hill, Haworth (H315) (4.3ha) – 123m from Grade II listed Central Park, Haworth
- Barr House Lane / Hollins Lane, Utley (H387) (4.2ha) – 192m from Grade II listed Whinburn

6.7.40 Several sites would be within 50m of a listed building, most notably:

- Langberries, Clayton Heights (H1143) (16.1ha) – contains Grade II listed 'Langberries Farmhouse'
- Alderscholes Lane (H1307) (3.6ha) – contains Grade II listed 'Thornton Railway Viaduct'
- Hill End Lane, Harden (H345) (0.4ha) – contains along its boundary the Grade II listed 'Hostel Stone'
- Coutances Way (H360) (25.7ha) – contains several Grade II listed buildings and structures including 'Wheatley Grange' and associated barn, outbuildings and walling to drive entrance.
- Mitchell Lane, Thackley (H613) (5.9ha) – contains Grade II listed 'Farm Cottage, Simpson Green Farmhouse…'
- Lower Fagley Lane, Fagley (H620) (7.9ha) – contains Grade II listed 'Ravenscliff Farmhouse and adjoining barn'
- Wilsden Road, Sandy Lane (H692) (13.8ha) – contains Grade II listed 'Bothy at roadside on east side of yard of Upper Swain Royd Farm…'
- Primrose Lane, Gilstead (H85) (1.8ha) – contains Grade II listed 'Milner Fields Gardens'
- Holme Farm, Holme Lane, Holmewood (H896) (1.1ha) – contains Grade II listed 'Holme Farmhouse'
- Main Street (H4) (4.6ha) – adjacent to 'Guide-post set in wall by bus stop opposite to junction with Church Street'
- Hollins Lane (H389) (3.7ha) – 2m from Grade II listed 'Upper Garden Pavillion at Whinburn'
- Carr House Gate (H900) (4.9ha) – 2m from Grade II listed '109, 111 and 113, Carr House Gate'
- Wheatley Lane, Ben Rhydding (H359) (1.3ha) – 3m from Grade II listed 'Outbuildings enclosing the farmyard of Wheatley Grange…'

- Park Road, Thackley (H619) (2ha) – 3m from Grade II listed ’47-53, Park Road’
- Ainsbury Avenue, Thackley (H622) (0.4ha) – 4m from Grade II listed ‘North Hall Farmhouse’
- Land off Buckingham Crescent, Clayton (H1204) (13.2ha) – 6m from Grade II listed ‘160-164, Bradford Road’
- Green Lane Thornton, Bradford (H1288) (2.4ha) – 8m from Grade II listed ‘Garden wall with 4 bee boles inset, to north west of Thornton Hall’
- Town End Road, Clayton (H1137) (1.8ha) – 9m from Grade II listed ‘Maltkiln House’
- Shaw Lane (H828) (0.4ha) – 12m from Grade II listed ’62-68, Shaw Lane’
- Harden Road, Harden (H342) (3.2ha) – 13m from Grade II listed ‘Ferrands Stone, approximately 15 metres east of Wood Side House’
- Land off Damems Lane (H478) (2ha) – 13m from Grade II listed ‘Damems Farmhouse and attached cottages’
- Dowley Gap Lane (2) (H81) (3ha) – 14m from Grade II listed ‘Leeds and Liverpool Canal Dowley Gap Bridge (Number 206)’
- Dowley Gap Lane (3) (H82) (0.5ha) – 14m from Grade II listed ‘Leeds and Liverpool Canal Scourer Bridge (Number 205)’
- Dowley Gap Lane (2) (H81) (3ha) – 14m from Grade II* listed ‘Leeds and Liverpool Canal two rise locks with overflow channel Dowley Gap’
- Glenview Close Nab Wood (H1015) (1.8ha) – 14m from Grade II listed ‘Barn immediately east of New Close Farmhouse’
- Skipton Road / Lyon Road (H1120) (15ha) – 15m from Grade II listed ‘Ivy House’
- Land south of Fenwick Drive, Woodside (H1154) (8.4ha) – 15m from Grade II listed ‘Royds Hall Cottages’
- Keighley Road (H277) (3.3ha) – 15m from Grade II listed ‘Barn to north of number 5’
- Marsh Top Farm, Moorhouse Lane (H822) (2.1ha) – 15m from Grade II listed ‘Moor Lane’
- Land west of Ned Lane, Holmewood (H996) (2ha) – 35m from Grade II listed ‘Numbers 18 and 20 and Adjoining Barn’

6.7.41 In addition, there would be 77 sites within 200m of a conservation area, as well as 25 sites within 200m of a locally listed building.

6.7.42 However, it is recognised that not all of the sites under this option would be taken forward for development, and as such there is likely to be some scope to reduce adverse impacts by focusing on less constrained sites. Nonetheless, some of these sites would likely be involved given the scale of growth required and extent of overlap / constraints.

6.7.43 Development focused on the urban edges of all settlements across the district, and within the identified Regeneration Areas of Keighley, Shipley and Bradford, would distribute potential effects across the district. This would likely help reduce the potential for significant adverse effects. It could also reduce potential impacts to townscape character and quality and could support opportunities for settlement-specific design stipulations to come forward. Additionally, growth through this approach is more likely to be able to avoid the most sensitive heritage constraints across the district.

6.7.44 However, it is noted that urban edge growth across settlements could lead to more extensive visual impacts to townscapes and character across a wider area. Furthermore, it could adversely impact upon historic settlement patterns and erode sense of identity. It is also recognised that a larger number of designated heritage assets are in proximity to the variable sites under this option compared to option RA2A (despite there being flexibility in site choice). In light of this, this option is considered likely to lead to **moderate negative effects**.

RA2C - Urban edge expansion without reliance on Regeneration Areas

6.7.45 Development through this option will largely lead to similar effects to those noted under option RA2B. However, this option has greater potential for cumulative effects on settlement character as it does not rely on Regeneration Areas. As such, 6,000 additional homes will likely need to be delivered in dispersed urban edge sites, with greater potential for cumulative negative effects on the character of settlements. In addition, this option would likely require the involvement of a higher number of sensitive sites where negative effects on setting of heritage assets would be more likely to arise. Considering this, **moderate negative effects** are predicted with a greater degree of certainty.

RA3A: Grey Belt-led strategy

6.7.46 Development through this approach will deliver growth on five sites that are within the Saltaire WHS buffer zone, namely:

- Hollin Hall Farm, High Bank Lane, Shipley (H1012) (4.2ha)
- Bingley Road, Nabwood (H1059) (5.3ha)
- Bankfield Farm, Nabwood (H1060) (1.6ha)
- West Lane (H1102) (0.4ha)
- Sherrif Lane, Eldwick (2) (H74) (2.5ha)

6.7.47 Three sites would be within 50m of a scheduled monument, namely:

- Carr Bank, Riddlesden (H540) (5.3ha) – contains along its boundary: ‘Carved rock on bank of How Beck, east of path from West Morton to Riddlesden and 440m southwest of Barn House Farm’.
- Shay Lane (H1336) (5.3ha) – 10m from ‘Late prehistoric enclosed settlement 150m north of Shaygate Farm, Wilsden’.
- Sherrif Lane, Eldwick (1) (H73) (10.6ha) – 25m from ‘Cup-marked rock west of confluence of Lodepit Beck and Glovershaw Beck’.

6.7.48 One site would overlap with a registered battlefield – West Gate Hill Street (1) (H891) (1.2ha), which would overlap with Adwalton Moor Historic Battlefield.

6.7.49 Eight sites would be within 200m of a registered park and garden, namely:

- Hollins Lane, Utley (H388) (4.1ha) – adjacent to Grade II listed Whinburn
- Hollins Lane (H389) (3.7ha) – adjacent to Grade II listed Whinburn
- West of Heights Lane, Eldwick (H68) (1.2ha) – adjacent to Grade II listed Prince of Wales Park
- West of Heights Lane, Eldwick (H107) (0.8ha) – adjacent to Grade II listed Prince of Wales Park
- Harden Road, Harden (H342) (3.2ha) – 14m from Grade II listed St Ives Estate
- Weavers Hill, Haworth (H315) (4.3ha) – 123m from Grade II listed Central Park, Haworth
- Brow Road (H336) (1.3ha) – 192m from Grade II listed Central Park, Haworth
- Barr House Lane / Hollins Lane, Utley (H387) (4.2ha) – 192m from Grade II listed Whinburn

6.7.50 Several sites would be within 50m of a listed building, most notably:

- Langberries, Clayton Heights (H1279) (7ha) – contains Grade II listed ‘Langberries Farmhouse’
- Hill End Lane, Harden (H345) (0.4ha) – contains along its boundary the Grade II listed ‘Hostel Stone’
- Mitchell Lane, Thackley (H613) (5.9ha) – contains Grade II listed ‘Farm Cottage, Simpson Green Farmhouse and integral barn…’
- Lower Fagley Lane, Fagley (H620) (7.9ha) – contains Grade II listed ‘Ravenscliff Farmhouse and adjoining barn’
- Holme Farm, Holme Lane, Holmewood (H896) (1.1ha) – contains Grade II listed ‘Holme Farmhouse’
- Albert Road, Brighouse and Denholme Road (H868) (0.7ha) – adjacent to ‘Milepost opposite junction with New Park Road’
- Hollins Lane (H389) (3.7ha) – 2m from Grade II listed ‘Upper Garden Pavilion at Whinburn’
- Carr House Gate (H900) (4.9ha) – 2m from Grade II listed ‘109, 111 and 113, Carr House Gate’
- Land off Buckingham Crescent, Clayton (H1270) (11.8ha) – 3m from Grade II listed ‘176-182, Bradford Road’
- Park Road, Thackley (H619) (2ha) – 3m from Grade II listed ’47-53, Park Road’
- Ainsbury Avenue, Thackley (H622) (0.4ha) – 4m from Grade II listed ‘North Hall Farmhouse’

- Land off Buckingham Crescent, Clayton (H1204) (13.2ha) – 6m from Grade II listed '160-164, Bradford Road'
- Green Lane Thornton, Bradford (H1288) (2.4ha) – 8m from Grade II listed 'Garden wall with 4 bee boles inset, to north west of Thornton Hall'
- North Cliffe Lane (H1301) (2ha) – 9m from Grade II listed 'Grandage Gate Farmhouse and adjoining barn'
- Ned Lane, Holmewood (H979) (2.9ha) – 9m from Grade II listed '25, Ned Lane'
- Land to north of Skipton Road (H1086) (0.9ha) – 10m from Grade II listed 'Crossmoor Farmhouse'
- Thornton Road (H1320) (0.5ha) – 11m from Grade II listed 'Stocks to east of Thornton Hall'
- Shaw Lane (H828) (0.4ha) – 12m from Grade II listed '62-68, Shaw Lane'
- Harden Road, Harden (H342) (3.2ha) – 13m from Grade II listed 'Ferrands Stone, approximately 15 metres east of Wood Side House'
- Brow Road (H336) (1.3ha) – 14m from Grade II listed 'Barn to south-east of Bridge House…'
- Holme Lane / Raikes Lane, Holmewood (H894) (1ha) – 14m from Grade II listed 'Ryecroft Farm'
- Glenview Close Nab Wood (H1015) (1.8ha) – 14m from Grade II listed 'Barn immediately east of New Close Farmhouse'
- Land south of Fenwick Drive, Woodside (H1154) (8.4ha) – 15m from Grade II listed 'Royds Hall Cottages'
- Keighley Road (H277) (3.3ha) – 15m from Grade II listed 'Barn to north of number 5'
- Marsh Top Farm, Moorhouse Lane (H822) (2.1ha) – 15m from Grade II listed 'Moor Lane'
- Land west of Ned Lane, Holmewood (H996) (2ha) – 35m from Grade II listed 'Numbers 18 and 20 and Adjoining Barn'

6.7.51 In addition, there would be 78 sites within 200m of a conservation area, as well as 29 sites within 200m of a locally listed building.

6.7.52 However, it is recognised that not all the sites under this option would need to be taken forward for development (to meet housing needs), and as such there is likely to be some scope to reduce adverse impacts by focusing on less constrained sites.

6.7.53 Where grey belt sites are identified as being located on the urban fringes of settlements – including Wilsden, Oakworth, and Burley in Wharfedale – it is possible that development could provide opportunities to improve their contribution towards the historic environment or townscape character and quality. However, some grey belt sites are 'provisional' and may be constrained by heritage features.

6.7.54 A number of grey belt sites in their current condition may still positively contribute to the setting of designated and non-designated heritage assets, areas and features, and could also contribute towards townscape character and quality. As such, their development could adversely impact upon the historic environment across Bradford. Nevertheless, this option is considered to perform more favourably than RA2B given that the site portfolio is generally more contained from a heritage perspective; therefore only **minor negative effects** are anticipated under this option.

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

6.7.55 The overall effects anticipated under this option are largely in line with those noted under option RA3A. However, more development would be required on grey belt sites, as there is no reliance on regeneration areas under this option, which could include some of the more sensitive sites (indeed, an additional 11 site options fall within the World Heritage Site Buffer Zone under this option). Cumulative impacts are likely to be greater given an additional 6,000 homes could be delivered outside the urban areas. Considering this, **moderate negative effects** are anticipated under this option.

Comparison of options (Built Environment)

6.7.56 Overall, RA1A performs most favourably, resulting in a minor positive effect, as it focuses growth within the existing urban area and on previously developed land, thereby minimising pressure on historic settlement edges, rural settings and the wider historic landscape. It also provides the greatest opportunity to secure beneficial outcomes through the regeneration and reuse of heritage assets and previously developed sites. Whilst it is possible that redevelopment of urban sites could have negative implications at higher densities, this is considered unlikely given the nature of the sites and areas involved.

6.7.57 The Preferred Option, RA2A, RA1B and RA3A are all considered likely to result in minor negative effects overall, although for different reasons. RA2A concentrates growth around Bradford and therefore reduces impacts on the character and identity of smaller settlements, whilst RA1B retains regeneration benefits but introduces additional greenfield development that may affect the setting of heritage assets and areas of townscape value in existing urban areas. RA3A benefits from focusing growth on Grey Belt land, which may reduce pressure on some more sensitive locations, although there remains potential for effects on heritage asset settings, conservation areas and settlement character. The Preferred Option similarly performs relatively well as it appears to avoid many of the most significant heritage constraints whilst maintaining flexibility in the distribution of growth.

6.7.58 In contrast, RA2B, RA2C and RA3B are considered more likely to result in moderate negative effects. These options would disperse a greater proportion of development across urban edges and peripheral locations throughout the district, increasing the likelihood of cumulative effects on settlement character, historic townscape, heritage asset settings and local distinctiveness.

6.7.59 In particular, the widespread distribution of growth across settlements such as Eldwick, Gilstead, Riddlesden, Haworth, Harden and Addingham has greater potential to erode established settlement patterns and alter historic relationships between built form and the surrounding countryside. The effects are most pronounced for RA2C and RA3B, which assume an additional 6,000 homes could be accommodated outside regeneration areas, increasing reliance on greenfield and edge-of-settlement sites. Overall, the options are scored according to the extent to which they support regeneration and existing settlement patterns, avoid sensitive heritage settings and minimise cumulative impacts on the character and identity of Bradford's towns and villages.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
-	+	-	-	--	--	-	--

6.8 Connectivity

IA objectives

- **Transport (8a)** To develop and maintain an integrated, efficient and accessible transport network that maximises access, increases sustainable transport choice, reduces congestion, and reduces the need to travel by private car/ lorry.
- **Sustainable Community Growth (9a)** To ensure that communities have good access to a range of good quality services and connections to wider social, environmental and economic networks.

Implications of the constants

6.8.1 In terms of accessibility to public transport, all of the constant sites are within reasonable walking distance (<800m) of the nearest bus stop. Whilst most sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all constant sites are within walking distance of the nearest public right of way (PRoW). As such, it is considered that the sites have good access to sustainable and active travel opportunities and perform well from a connectivity standpoint.

6.8.2 Focusing on access to employment opportunities, 11 constant sites are over 5km from the nearest employment zone. However, as noted above, all sites are within walking distance to a bus stop, which will likely provide connections to these employment zones. This is important given the most popular method used to travel to work in Bradford is driving a car or van (50%). It is also noted that Bradford has a high level of congestion compared to the national average, concentrated at local hot spots during peak times.

6.8.3 In terms of access to services and facilities, 50 constant sites are not within walking distance of the nearest local centre, whilst 71 are not within walking distance of the nearest GP surgery. This largely reflects where the sites sit within the existing settlement hierarchy.

6.8.4 In terms of access to recreational facilities, all sites are within walking distance of the nearest open space. However, only 27 are within walking distance of the nearest sports centre / pool. Nevertheless, the level of access to open spaces is a positive and the constant sites perform well in this respect.

6.8.5 Finally, regarding access to educational facilities, 54 constant sites are within walking distance of the nearest primary school, whilst the majority of sites are not within walking distance of the nearest secondary school. However, secondary school age students will likely utilise the bus network to access school, which the constant sites are well connected to.

Preferred Option

6.8.6 In terms of accessibility to public transport, all but three variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all the sites are within walking distance of the nearest PRoW.

6.8.7 Focusing on access to employment opportunities, 17 sites are over 5km from the nearest employment zone. However, as noted above, all but three sites are within walking distance to a bus stop, which will likely provide connections to these employment zones by public transport.

6.8.8 In terms of access to services and facilities, 42 sites are not within walking distance of the nearest local centre, whilst 42 sites are not within walking distance of the nearest GP surgery. However, new development (especially on larger sites or combinations of sites could help to introduce such services).

6.8.9 In terms of access to recreational facilities, all sites are within walking distance of the nearest open space, and there is good access to the countryside for sites that are dispersed wider. However, the majority of sites are not within walking distance of the nearest sports centre / pool.

6.8.10 Finally, regarding access to educational facilities, 29 sites are not within walking distance of the nearest primary school, whilst the majority of sites are not within walking distance of the nearest secondary school. However, secondary school age students will likely utilise the bus network to access school, which the sites under this option are well connected to.

6.8.11 Overall, by focusing growth primarily on the urban edge of settlements, this option is less likely to be as well connected as those that deliver growth within the settlement boundaries (i.e. options RA1A and RA1B) and on the urban edge of Bradford (RA2A). However, this option does have potential to deliver transport infrastructure improvements, associated with new development, to more locations across the district and is supportive of the local services in smaller settlements.

<u>Transport</u>

6.8.12 With regards to ‘transport’ this option is likely to have neutral effects. The vast majority of growth is within urban areas and follows a logical pattern of distribution across the settlement hierarchy.

6.8.13 There are some sites that are likely to lead to an increase in car usage and therefore potentially contribute towards congestion, but this is offset by broadly good access to sustainable modes of transport. Expansion around Bradford on selected sites is also likely to lead to increased car trips, but in the longer term could help to support aspirations for a successful mass transit network. **Minor positive effects** are predicted in this regard, but there is a greater degree of uncertainty relating to the potential for car trip increases.

Sustainable community growth

6.8.14 With regards to access, provision and support for community services, the option performs very well. Whilst the bulk of growth is directed to locations that are very well served by facilities and are established communities, additional growth is also directed to a range of smaller settlements, helping to support local growth without overwhelming services. This will help to maintain community vitality, and in some instances contribute to improvements in local facilities including open space and social infrastructure. It is also worth noting that this option still includes growth at Holme Wood, which provides a good opportunity to create a new well serviced community. Overall, **major positive effects** are predicted in this regard.

RA1A – Urban intensification through previously developed land

6.8.15 In terms of accessibility to public transport, all variable sites included under this option are within reasonable walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all the sites are within walking distance of the nearest PRoW.

6.8.16 Focusing on access to employment opportunities, three sites are over 5km from the nearest employment zone. However, as noted above, all sites are within walking distance to a bus stop, which will likely provide connections to these employment zones.

6.8.17 In terms of access to services and facilities, only nine sites are not within walking distance of the nearest local centre, whilst 24 sites are not within walking distance of the nearest GP surgery.

6.8.18 In terms of access to recreational facilities, all sites are within walking distance of the nearest open space. However, the majority of sites are not within walking distance of the nearest sports centre / pool and are a further distance from the ‘countryside’.

6.8.19 Finally, regarding access to educational facilities, 14 sites are not within walking distance of the nearest primary school, whilst the majority of sites are not within walking distance of the nearest secondary school. However, secondary school age students will likely utilise the bus network to access school, which the sites under this option are well connected to.

Transport

6.8.20 Overall, this option is considered to perform favourably from a transport and congestion standpoint as urban sites are most likely to be in proximity to existing services and facilities, employment opportunities, educational facilities, and active travel and public transport infrastructure. Under this option, variable sites are primarily located in Bradford and Keighley, which are two of the best-connected settlements in the district. In this regard, **moderate positive effects** are predicted, as residual growth is less likely to drive increases in car-based travel compared to urban edge comparators.

Sustainable community growth

6.8.21 Under this option, residual growth is directed further to the most established settlements that are well serviced. In one respect, this is positive as it ensures that new homes are supported in sustainable communities. However, it does less to bring additional benefits to a wider range of settlements. Nevertheless, **major positive effects** are still predicted.

RA1B – Urban intensification through additional urban sites

6.8.22 In terms of accessibility to public transport, all variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all the sites are within walking distance of the nearest PRoW.

6.8.23 Focusing on access to employment opportunities, 20 sites are over 5km from the nearest employment zone. However, as noted above, all sites are within walking distance to a bus stop, which will likely provide connections to these employment zones.

6.8.24 In terms of access to services and facilities, 53 sites are not within walking distance of the nearest local centre, whilst 80 sites are not within walking distance of the nearest GP surgery. In this respect, residual growth is not particularly well connected to these services and facilities.

6.8.25 In terms of access to recreational facilities, all but one site are within walking distance of the nearest open space. However, the majority of sites are not within walking distance of the nearest sports centre / pool.

6.8.26 Finally, regarding access to educational facilities, 37 sites are not within walking distance of the nearest primary school, whilst the majority of sites are not within walking distance of the nearest secondary school. However, secondary school age students will likely utilise the bus network to access school, which the sites under this option are well connected to.

Transport

6.8.27 Overall, this option is considered to perform favourably from a connectivity / transport standpoint. Similarly to RA1A, by focusing on urban intensification this option is likely to deliver sites in proximity to existing services and facilities, employment opportunities, educational facilities, and active travel and public transport infrastructure.

6.8.28 However, given this option only includes greenfield and mixed sites, naturally these are less concentrated in the core of existing settlements and access is not as strong as for RA1A. Nevertheless, **moderate positive effects** are still considered likely.

Sustainable community growth

6.8.29 The effects are similar to those discussed above under RA1A, but given that a loss of greenspace will be involved (which could affect local access to such facilities), this reduces the performance of this option to **moderate positive**. It is also worth noting that some sites are not as well connected to services and facilities by sustainable modes compared to RA1A.

RA2A – Urban edge expansion around Bradford

6.8.30 In terms of accessibility to public transport, all variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all but one site are within walking distance of the nearest PRoW.

6.8.31 Focusing on access to employment opportunities, none of the sites are over 5km from the nearest employment zone. In addition, as noted above, all sites are within walking distance to a bus stop, which will likely provide connections to these employment zones.

6.8.32 In terms of access to services and facilities, 38 sites are not within walking distance of the nearest local centre, whilst 44 sites are not within walking distance of the nearest GP surgery.

6.8.33 In terms of access to recreational facilities, all but one site are within walking distance of the nearest open space. However, the majority of sites are not within walking distance of the nearest sports centre / pool.

6.8.34 Finally, regarding access to educational facilities, 21 sites are not within walking distance of the nearest primary school, whilst the majority of sites are not within walking distance of the nearest secondary school. However, secondary school age students will likely utilise the bus network to access school, which the sites under this option are well connected to.

6.8.35 It is worth noting that this option would likely involve urban extensions to Bradford, and this could bring opportunities to enhance sustainable transport networks – conversely, it could lead to an increase in car-based travel if edge communities are not well supported by infrastructure.

Transport

6.8.36 Overall, by focusing growth on the urban edge of Bradford (the Regional City), this option is less likely to be as well connected as those that deliver residual growth solely within the settlement boundaries (i.e. options RA1A and RA1B). However, they may be able to capitalise upon and improve Bradford's existing transport network, allowing residents to access the city centre via sustainable modes of travel, where the widest range of services and facilities are located. There is also potential to support self-serviced communities, but also a risk that car-based travel could increase. On balance, **minor positive effects** are predicted.

Sustainable community growth

6.8.37 This option provides residual growth at the edge of existing urban areas around Bradford. On one hand, this could help to support edge communities, as well as providing opportunities to deliver new self-sufficient developments (in terms of local services and access to greenspace for example). However, the concentration of residual growth at Bradford Regional City misses some opportunities to support continued sustainable growth in a range of other settlements across the district. Therefore, **moderate positive effects** are predicted on balance.

RA2B – Urban edge expansion across the District

6.8.38 It is noted that not all sites under this option would be taken forward for development, and therefore there is a degree of uncertainty in this respect.

6.8.39 In terms of accessibility to public transport, all but two of the variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all but one site are within walking distance of the nearest PRoW.

6.8.40 Focusing on access to employment opportunities, 57 sites are over 5km from the nearest employment zone. However, as noted above, all sites are within walking distance to a bus stop, which will likely provide connections to these employment zones. Nevertheless, this is a high number relative to the other options.

6.8.41 In terms of access to services and facilities, over 100 sites are not within walking distance of the nearest local centre or GP surgery.

6.8.42 In terms of access to recreational facilities, all but three sites are within walking distance of the nearest open space. However, the majority of sites are not within walking distance of the nearest sports centre / pool.

6.8.43 Finally, regarding access to educational facilities, over 100 sites are not within walking distance of the nearest primary school, whilst the majority of sites are not within walking distance of the nearest secondary school. However, secondary school age students will likely utilise the bus network to access school, which the sites under this option are well connected to.

Transport

6.8.44 Overall, by focusing growth on the urban edge of all settlements, this option is less likely to be as well connected as those that deliver residual growth within the settlement boundaries (i.e. options RA1A and RA1B) and on the urban edge of Bradford (RA2A). However, this option does have greater potential to deliver transport infrastructure improvements, associated with new development, to more locations across the district. In addition, by focusing growth along the A629 / A650 corridor, this option capitalises on existing connections to Bradford, including bus routes. Nevertheless, this option is considered more likely to increase car-based travel for a proportion of growth and as such, **neutral effects** are predicted with regards to transport and congestion. Though there is uncertainty relating to which exact sites would be involved, a large amount of these are less accessible than sites within the urban areas and edge of Bradford.

Sustainable community growth

6.8.45 Focusing additional growth to a wider range of settlements could have mixed effects. On one hand it helps to support growth in established communities that could benefit from additional homes (and potentially improvements to facilities). However, this approach could put undue pressure on some settlements which could be counterproductive in terms of supporting sustainable growth. On balance, **moderate positive effects** are predicted.

RA2C - Urban edge expansion without reliance on Regeneration Areas

6.8.46 Development through this option will largely lead to similar effects to those noted under option RA2B. However, this option has greater potential for adverse effects with respect to connectivity as it does not rely on regeneration areas. As such, 6,000 additional homes will likely need to be delivered in dispersed urban edge sites, which are generally less well-connected to sustainable transport options.

6.8.47 The overall effects anticipated under this option are largely in line with those noted under option RA2B. However, more development would be required on urban edge sites, as there is no reliance on regeneration areas under this option, which could include more of the less well-connected locations. Cumulative impacts are likely to be greater given an additional 6,000 homes could need to be planned outside the urban areas. Considering this, **minor negative effects** are predicted as it could push car-based travel higher than the other options, affecting modes of travel and congestion.

Sustainable community growth

6.8.48 Significant increases in growth at settlements could have mixed effects. On one hand it could help to drive improvements to facilities and strengthen community resilience and the role of some settlements in the settlement hierarchy. However, in some locations, growth could lead to significant pressure on services without the required upgrades, placing an increasing amount of people in areas that are less well serviced. On balance, **moderate positive effects** are predicted.

RA3A: Grey Belt-led strategy

6.8.49 It is noted that not all sites under this option would be taken forward for development, and therefore there is a degree of uncertainty in this respect.

6.8.50 In terms of accessibility to public transport, all but four variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all but one site are within walking distance of the nearest PRoW.

6.8.51 Focusing on access to employment opportunities, 72 sites are over 5km from the nearest employment zone. However, as noted above, all sites are within walking distance to a bus stop, which will likely provide connections to these employment zones. Nevertheless, this is a large number of sites with poorer accessibility to employment relative to the other options.

6.8.52 In terms of access to services and facilities, over 100 sites are not within walking distance of the nearest local centre or GP surgery.

6.8.53 In terms of access to recreational facilities, all but five sites are within walking distance of the nearest open space. However, the majority of sites are not within walking distance of the nearest sports centre / pool.

6.8.54 Finally, regarding access to educational facilities, over 100 sites are not within walking distance of the nearest primary school, whilst the majority of sites are not within walking distance of the nearest secondary school.

6.8.55 However, secondary school age students will likely utilise the bus network to access school, which the sites under this option are well connected to.

6.8.56 Overall, the distribution of growth under this option is similar to RA2B, however under this option the focus is on grey belt sites. As such, and similarly to option RA2B, this option is less likely to be as well connected as options which deliver growth within the settlement boundaries (i.e. options RA1A and RA1B) and on the urban edge of Bradford (RA2A). As such **neutral effects** are predicted for this option.

Sustainable community growth

6.8.57 Similar effects are predicted to RA2B, which also disperse growth across a wider area. Overall, **moderate positive effects** are predicted for the same reasons.

RA3B – Grey Belt (No reliance on regeneration areas)

Transport

6.8.58 The overall effects anticipated under this option are largely in line with those noted under option RA3A. However, more development would be required on grey belt sites, as there is no reliance on regeneration areas under this option, which could include in less well-connected locations. Cumulative impacts are likely to be greater given an additional 6,000 homes will need to be planned outside the urban areas. Considering this, **minor negative effects** are predicted as it could push car-based travel higher than the other options, affecting modes of travel and congestion.

Sustainable community growth

6.8.59 Significant increases in growth at settlements could have mixed effects. On one hand it could help to drive improvements to facilities and strengthen community resilience and the role of some settlements in the settlement hierarchy. However, in some locations, growth could lead to significant pressure on services without the required upgrades, placing an increasing amount of people in areas that are less well serviced. On balance, **moderate positive effects** are predicted.

Comparison of options (Transport)

6.8.60 The options perform differently against this objective depending on the extent to which growth is concentrated within Bradford and other established urban areas, where employment opportunities, higher-order services and public transport networks are focused. Options that direct growth to urban locations are generally more likely to support sustainable travel patterns, reduce the need to travel by private car and maximise access to jobs and services.

6.8.61 Conversely, options that distribute a greater proportion of growth to urban edge or dispersed locations are more likely to increase trip lengths and car dependency, despite potentially providing opportunities for local transport improvements.

6.8.62 RA1A performs most favourably, as it directs residual growth to previously developed urban sites within the district's most accessible settlements. This maximises access to existing public transport, employment opportunities and services, whilst minimising the risk of additional car-based travel.

6.8.63 RA1B performs similarly well, although the inclusion of a greater proportion of greenfield and mixed sites results in slightly lower levels of accessibility and a greater likelihood of car-based trips in some locations.

6.8.64 The Preferred Option and RA2A retain a strong focus on Bradford and therefore benefit from proximity to the district's largest concentration of jobs, services and public transport infrastructure. Whilst urban extensions are generally less accessible than urban intensification and may generate additional car trips, they also provide opportunities to support strategic transport improvements and future mass transit aspirations. On balance, both are expected to generate positive transport outcomes, with RA2A performing marginally better due to its stronger concentration of growth around Bradford.

6.8.65 RA2B and RA3A perform less favourably. Whilst both could support transport improvements across a wider area and are generally served by bus networks, a greater proportion of development would be located on the edge of settlements where reliance on private vehicles is likely to be higher and accessibility to employment and services is generally lower. As a result, the positive effects associated with supporting sustainable travel are largely offset by increased risks of car dependency.

6.8.66 RA2C and RA3B perform least favourably. The absence of reliance on regeneration areas requires a substantial amount of additional growth to be accommodated on urban edge or grey belt sites. This increases the likelihood of development occurring in less well-connected locations, leading to greater levels of car-based travel and associated congestion compared with other options.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
+?	++	++	+	0	-	0	-

Comparison of options (Sustainable community growth)

6.8.67 Performance against this objective reflects the balance between directing growth to the district's most accessible locations and supporting the vitality of a wider range of settlements. Whilst urban-focused growth generally provides the best access to services and facilities, a proportionate level of growth in smaller settlements can help support local services and community resilience. However, increasingly dispersed patterns of growth are more likely to place development in locations with lower levels of accessibility and place greater pressure on existing infrastructure.

6.8.68 The Preferred Option performs favourably as it combines a strong focus on Bradford and the main settlements with a more limited distribution of growth elsewhere, helping to support local facilities without significantly diluting accessibility. RA1A performs strongly due to its focus on the district's most accessible settlements, although it provides fewer benefits to communities elsewhere. RA1B performs similarly, but the inclusion of a greater proportion of greenfield sites slightly reduces accessibility. RA2A also performs positively through its focus on urban extensions around Bradford, although opportunities to support a wider range of settlements are more limited.

6.8.69 The more dispersed options (RA2B, RA3A, RA2C and RA3B) could help sustain services across a broader range of settlements, but these benefits are increasingly offset by lower accessibility and greater pressure on infrastructure. Within this group, RA2B and RA3A perform more favourably than RA2C and RA3B, as the latter require a greater proportion of growth outside regeneration areas and are more likely to direct development to less accessible locations.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
+++	+++	++	++	++	++	++	++

6.9 Climate and resources

IA objectives

10. Addressing causes of climate change (mitigation)

- **(10a)** Ensure the prudent and efficient use of energy and resources, whilst promoting the use of renewable and low carbon energy sources.
- **(10b)** To reduce greenhouse gas emissions by supporting development that promotes sustainable travel, reduces the need to travel, and facilitates the transition to low-carbon transport.

11. Climate change resilience (adaptation)

- **(11a)** Minimise and manage the impacts of climate change on the district and vulnerability to its effects, particularly flood risk and overheating.

12. Natural resources (soil, waste, minerals, hazardous installations)

- **(12a)** To prioritise the development of previously developed land and buildings including via the remediation of contaminated land and protection of greenfield sites.
- **(12b)** Protect agricultural land and soils and avoid the loss of the highest-quality grades.
- **(12c)** To protect mineral resources from sterilisation by other uses and promote the greater use of secondary and recycled materials.
- **(12d)** To minimise different types of waste and increase the amount that is re-used, recycled and recovered.

13. Water resources

- **(13a)** Reduce water consumption, improve water quality, and ensure an adequate supply of water can be provided in Bradford whilst also reducing the potential for contamination of waterbodies and groundwater.

14. Air quality

- **(14a)** To safeguard and improve air quality and reduce the impacts upon human health.

Implications of the constants

<u>Addressing the causes of climate change</u>

6.9.1 In terms of climate change mitigation, accessibility of the constant sites to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme in detail.

6.9.2 All constant sites are within walking distance (<800m) of the nearest bus stop. Whilst most sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all constant sites are within walking distance of the nearest PRoW. As such, it is considered that the sites have good access to sustainable and active travel opportunities and perform well from a connectivity standpoint.

6.9.3 It is also noted that emissions per capita will likely be less on denser developments in urban areas compared to development on greenfield sites. As a notable proportion of the constant sites are PDL or mixed they are considered to perform well in this respect.

Climate change resilience

6.9.4 Focusing next on climate change adaptation, the following constant sites overlap (>50%) with Flood Zone 2 and/or 3:

- North Brook Street, Valley Road (H223) (1.7ha) – 100% overlap with Flood Zone 2 and 89% overlap with Flood Zone 3
- Midlands Mills, Valley Road (H235) (1ha) – 90% overlap with Flood Zone 2 and 62% overlap with Flood Zone 3

6.9.5 In respect of the above, it is noted that both sites are relatively small (<2ha) and so the magnitude of effects is limited. It is also noted that both sites are in the regeneration area on PDL, and therefore the inclusion of green infrastructure could help mitigate flood risk in these locations. There will also be a need to mitigate flood risk.

6.9.6 A small number of additional sites are overlapped partially by areas of Flood Zone 2/3 (i.e. less than 25%), and therefore the potential to avoid affected areas of the site should be greater. Nonetheless, it is worth identifying these sites.

- H1047 - Regent House – 23% overlap with Flood Zone 2
- H1090 - Sykes Lane – 8% overlap with Flood Zone 2
- H1258 - Thornton Road, Leaventhorpe – 25% overlap with Flood Zone 2 and 20% overlap with Flood Zone 3.
- H834 - Cross Lane - 15% overlap with Flood Zone 2 and 11% overlap with Flood Zone 3.
- H282 - Old Road, Denholme - 9% overlap with Flood Zone 2 and 9% overlap with Flood Zone 3.
- H225 - Former Bee Hive Mills, Smith Street – 8% overlap with Flood Zone 2.
- H217 - Fulton Street/Sunbridge Road - 8% overlap with Flood Zone 2.
- H1163 - Between Clayton Lane and Lister Arms, Manchester Rd - 6% overlap with Flood Zone 2.

6.9.7 Regarding surface water flood risk, only one constant site overlaps (>50%) with areas at risk of flooding from surface water from a 1 in 100 event, namely North Brook Street, Valley Road (H223) (1.7ha) with a 78% overlap.

Water quality

6.9.8 It is noted that none of the sites overlap with a groundwater source protection zone (SPZ). Development on urban sites has the potential to increase pollution in urban run-off, but conversely, presents the chance to introduce measures to help mitigate impacts and improve water quality longer term.

Air quality

6.9.9 There is potential for localised adverse effects where constant sites are exposed to existing poor air quality. The following sites are adjacent to an Air Quality Management Area (AQMA), and as such have the potential to adversely impact upon human health through the delivery of development in areas with higher concentrations of pollutants:

- Spring Bank Place (H788) (0.6ha) – AQMA No. 2.
- Land and buildings south of Sunbridge Road (H218) (0.6ha) – AQMA No. 3.

6.9.10 It is noted that these sites are relatively small though and the increase in exposure from these alone is relatively low.

6.9.11 More broadly speaking, the constant sites are all within the urban areas and have a good level of accessibility (to varying degrees across different settlement areas). In this regard, maximising urban capacity through these sites is a positive approach with regards to air quality.

Land, soil, minerals and waste

6.9.12 In terms of the potential need for ground remediation, 17 of the constant sites overlap with a historical landfill site.

6.9.13 Focusing on BMV agricultural land (i.e. Grades 1-3a), 50 constant sites overlap (>50%) with Grades 1-3 agricultural land. However, many of the sites are already developed or within an urban setting and are unlikely to be valued agricultural land and soil.

6.9.14 Regarding mineral safeguarding areas (MSAs), most of the constant sites overlap (>50%) with MSAs. In this respect, all options could lead to the sterilisation of mineral resources. However, it is recognised that given the large coverage of MSAs across the district, it is difficult to avoid development on MSAs, particularly given the availability of suitable sites. It is also unlikely that sites within the urban area would be appropriate for significant minerals workings.

Preferred Option

Addressing the causes of climate change

6.9.15 In terms of climate change mitigation, accessibility of the variable sites to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme. To recap, all but three variable sites included under this option are within walking distance (<800m) of a bus stop.

6.9.16 Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all the sites are within walking distance of the nearest PRoW.

6.9.17 Emissions per capita are likely to be lower in denser urban developments, where more compact built forms can reduce embodied carbon per dwelling through more efficient use of land, infrastructure and construction materials.

6.9.18 Higher-density development can also improve operational energy efficiency by supporting building types such as terraces and apartments, which typically have lower energy demands than detached housing. As none of the variable sites within the preferred option are PDL, and only one is a mixed site, they are considered to perform less favourably in this respect.

6.9.19 Overall, whilst the preferred strategy directs growth to accessible locations, by delivering residual development on predominantly greenfield sites on the settlement edge it is less likely to reduce per capita emissions compared to RA1A. As such, **minor positive effects** are predicted.

Climate change adaptation

6.9.20 Of all the additional sites proposed under this option, only one is overlapped considerably (i.e. more than 40% by areas of flood zones 2/3). Site H420 - Bradford Road, Riddlesden, Keighley is overlapped by FZ2 on 45% of the site and FZ3 on 12% of the site. It ought to be possible to avoid these parts of the site given that it is almost 3ha in size.

6.9.21 Of the 63 variable sites involved with this option, only seven are overlapped with areas of flood zone 2 and 3. For all but one site (discussed above), this equates to less than 10% of the site area.

6.9.22 The additional growth involved is broadly in line with the exception and sequential tests and is unlikely to significantly increase flood risk. Though development of these areas will involve the transformation of greenfield sites, it is expected that SUDs would be incorporated into development to minimise on and offsite flood risk.

6.9.23 Some parts of the Regeneration Areas and a small number of allocated sites are identified as of high flood risk. These are primarily located within a major regeneration area of Bradford City and provide significant opportunities to direct growth towards previously developed and accessible urban locations.

6.9.24 Development in these areas will need to be supported by site-specific flood risk assessments and appropriate mitigation measures, in accordance with national policy. There may also be opportunities to reduce flood risk more strategically through investment in flood management infrastructure and wider regeneration initiatives.

6.9.25 It is also important to note that these areas are likely to be subject to investment to deliver new transport infrastructure, housing and employment and likely to involve a significant re-engineering of parts of the city over the lifetime of the Local Plan. A comprehensive approach to managing flood risk within the Bradford Beck corridor will need to be carried out, which may include watercourse and flood engineering, alleviation works including green and blue infrastructure investment as part of a package of measures to reduce flood risk across the city.

6.9.26 These sites remain prime regeneration opportunities and contribute towards the wider spatial strategy of prioritising the renewal of brownfield sites and focusing growth within Regeneration Areas and the Regional City

6.9.27 As a result, although flood risk represents an important constraint and residual risks may remain in some locations, it is considered likely that the majority of effects can be reduced through the application of appropriate mitigation and flood risk management measures.

6.9.28 While regeneration and higher-density development could contribute to localised urban heating, opportunities for urban greening and climate-responsive design are expected to minimise effects. Consequently, urban heating is not considered likely to represent a significant constraint.

6.9.29 Overall, **neutral effects** are predicted.

Water quality

6.9.30 It is noted that none of the sites overlap with a groundwater SPZ.

6.9.31 Considering issues more broadly, the Preferred Option combines growth around Bradford with growth at other settlements, spreading development pressures across a number of catchments.

6.9.32 Whilst this would result in the loss of greenfield land and some increased pressure on drainage infrastructure, effects are expected to be manageable through standard mitigation measures and residual growth on greenfield land could provide opportunities for natural solutions. Overall, **neutral effects** are predicted at this strategic level.

Air quality

6.9.33 None of the variable sites under the preferred options are adjacent to an AQMA. In addition, as the sites are largely located in accessible locations, air quality is unlikely to worsen significantly as a result of increased trips by private vehicles. This option represents a fairly balanced approach, directing some residual growth towards Bradford (with greater opportunities to support modal shift in the longer term) whilst also accommodating growth elsewhere in broadly accessible locations next to existing settlements. Overall, **minor positive effects** are predicted.

Land, soil, minerals and waste

6.9.34 In terms of the potential need for ground remediation, only six of the variable sites under the preferred option overlap with a historical landfill site. There will be a need to consider mitigation and remediation here though.

6.9.35 Focusing on BMV agricultural land (i.e. Grades 1-3a), several sites overlap considerably with land predicted to be Grade 2 or 3a land (A total of approximately 80 ha). For example, H1353 is 3.8ha of Grade 2 land, H1279 is 9ha of Grade 3a land.

6.9.36 Regarding MSAs, most of the constant sites overlap (>50%) with MSAs. In this respect, all options could lead to the sterilisation of mineral resources.

6.9.37 However, it is recognised that given the large coverage of MSAs across the district, it is difficult to avoid development on MSAs, particularly given the availability of suitable sites. It is also unlikely that all areas affected would be suitable for mineral extraction. Nonetheless, negative effects could arise.

6.9.38 In terms of waste, regardless of the level of development that comes forward, waste collection and management facilities will need to be expanded to accommodate the anticipated increase in waste from new households. There are no known capacity issues in this regard.

6.9.39 Overall, the preferred option is anticipated to lead to **moderate negative effects** on land, soil, minerals and waste. This is because it will lead to the loss of a substantial amount of greenfield land, some of which is predicted to be BMV (a mix of Grade 2 (18ha) and 3a (60ha) land totalling approximately 80ha). as well as the sterilisation of mineral resources (although it is noted this is largely unavoidable).

6.9.40 The negative effects are moderated by the fact that a substantial element of growth through the constant elements of the strategy and the Regeneration Areas involves efficient use of land, and in the context that there would be pressures to release greenfield land in absence of an updated Plan.

RA1A – Urban intensification through previously developed land

Addressing the causes of climate change

6.9.41 In terms of climate change mitigation, accessibility of the variable sites included under this option to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme. To recap, all variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all the sites are within walking distance of the nearest PRoW.

6.9.42 By focusing additional growth on PDL sites within the settlement boundaries, this option is likely to perform positively from a climate change mitigation standpoint. This is because urban areas tend to have the best sustainable transport options and are generally well located to essential services and facilities via active travel modes.

6.9.43 This option also helps to make best use of existing infrastructure and is most positive with regards to embodied carbon considerations. However, a degree of ad hoc growth could be expected given that housing needs would not be fully met under this approach. Nonetheless, a **moderate positive effect** is predicted.

Climate change adaptation

6.9.44 Focusing next on climate change adaptation, the following variable sites overlap (>50%) with Flood Zone 2 and/or 3:

- Lower Holme Mill, Otley Road (H1009) (3.6ha) – 100% overlap with Flood Zone 2 and 3
- Castlefields Lane (H91) (0.7ha) – 100% overlap with Flood Zone 2 and 3
- Otley Road (H1010) (0.5ha) – 100% overlap with Flood Zone 2 and 3

- Dalton Mills, Dalton Lane, Keighley (H411) (1.3ha) – 100% overlap with Flood Zone 2 and 96% overlap with Flood Zone 3
- Royd Ings Avenue, Keighley (H481) (2.6ha) – 100% overlap with Flood Zone 2
- George Street B (H221) (1ha) – 93% overlap with Flood Zone 2 and 81% overlap with Flood Zone 3
- Walk Mills, The Walk, Keighley (H548) (1.7ha) – 91% overlap with Flood Zone 2
- Area west of Valley Road (H222) (1.7ha) – 82% overlap with Flood Zone 2 and 53% overlap with Flood Zone 3
- Harclo Road, Keighley (H412) (1.7ha) – 77% overlap with Flood Zone 2 and 66% overlap with Flood Zone 3
- Shearbridge Road (H1161) (1.6ha) – 63% overlap with Flood Zone 2
- Clifford Street Car Park (0.4ha) – 62% overlap with Flood Zone 2

6.9.45 Regarding surface water flood risk, none of the variable sites overlap (>50%) with areas at risk of flooding from surface water from a 1 in 100 event.

6.9.46 In terms of climate change adaptation overall, several of the variable sites under this option are within areas of Flood Zone 2 and/or 3, with further growth in the Regeneration Areas also affected by flood risk. Though most of the sites involved are relatively small (<2ha), a greater number of sites are directly affected by urban flood risk, and this additional urban focus could lead to **minor negative effects.**

Water quality

6.9.47 Only one site, West Lane (H41) (8.1ha), overlaps a groundwater Source Protection Zone (SPZ), with the overlap limited to approximately 10% of the site area. Significant adverse effects on groundwater resources are therefore not anticipated. Furthermore, the strategy's enhanced focus on previously developed land could provide opportunities to improve surface water management and water quality through land remediation, redevelopment and the incorporation of modern drainage infrastructure. By reducing the need for greenfield development, the strategy may also help to minimise pressures on water resources and watercourses. A potential / uncertain **minor positive effect** is predicted.

Air quality

6.9.48 Only one variable site is adjacent to an AQMA – Burnett Street Car Park (H227) (0.3ha), which is adjacent to AQMA No. 4. However, given the small size of this site, the increase in residents exposed to poor air quality would be of a small magnitude.

6.9.49 More broadly speaking, this option focuses growth within existing urban areas, close to jobs, services and facilities, thereby reducing the need to travel and supporting sustainable modes.

6.9.50 Whilst additional residents may be located within areas already experiencing poorer air quality (including at the site identified above) overall traffic-related emissions are likely to be lower than under more dispersed growth options. Therefore, **minor positive effects** are predicted for air quality.

Land, soil, minerals and waste

6.9.51 In terms of the potential need for ground remediation, two of the variable sites overlap with a historical landfill site. This is the lowest number of sites when comparing all the options, but this is not a significant determinant of overall effects.

6.9.52 Focusing on BMV agricultural land (i.e. Grades 1-3a), only two variable sites overlap with Grades 1-3 agricultural land (totalling less than 3ha). This is, by a notable margin, the lowest overlap when comparing all the options, reflecting the focus on previously developed land (PDL) within existing urban areas. Given the nature and location of these sites, the potential for loss of productive agricultural land, including BMV land, is likely to be limited.

6.9.53 Regarding MSAs, most of the variable sites overlap (>50%) with MSAs. In this respect, this option could lead to the sterilisation of mineral resources.

6.9.54 However, it is recognised that given the large coverage of MSAs across the district, it is difficult to avoid development on MSAs, particularly given the availability of suitable sites.

6.9.55 In addition, by focusing on PDL these sites have likely already led to mineral sterilisation via previous development (and are unlikely to be realistic locations for widescale minerals extraction).

6.9.56 In terms of waste, collection and management facilities will need to be expanded to accommodate the anticipated increase in waste from new households. There are no known issues in this regard, and the compact urban strategy should help to ensure that collection routes are efficient.

6.9.57 Overall, this option is likely to have the least impact on BMV land resource, and whilst it is recognised that most of the variable sites overlap with MSAs, it is also noted that by focusing on PDL these sites have likely already led to mineral sterilisation via previous development. As such, **neutral effects** are noted.

RA1B – Urban intensification through additional urban sites

Addressing the causes of climate change

6.9.58 In terms of climate change mitigation, accessibility of the variable sites included under this option to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme. To recap, all variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all the sites are within walking distance of the nearest PRoW. Therefore, this option should help to reduce car dependency and contribute to a reduction in emissions longer term.

6.9.59 As with option RA1A, this option will make more effective use of existing infrastructure, which reduces emissions associated with the construction of new infrastructure on the urban periphery. However, embodied carbon considerations are slightly higher given the loss of greenfield land. Considering this and the above, **moderate positive effects** are considered likely at this stage.

Climate change adaptation

6.9.60 Focusing next on climate change adaptation, the following variable sites overlap (>50%) with Flood Zone 2 and/or 3:

- Marriner Road, Keighley (H549) (1.2ha) – 99% overlap with Flood Zone 2 and 88% overlap with Flood Zone 3
- Keighley Road (H1070) (6.5ha) – 91% overlap with Flood Zone 2 and 76% overlap with Flood Zone 3
- Beanlands Parade (H370) (0.3ha) – 87% overlap with Flood Zone 2 and 76% overlap with Flood Zone 3
- Leeds Road (H355) (2.1ha) – 86% overlap with Flood Zone 2
- Lyon Road (H1119) (2.7ha) – 81% overlap with Flood Zone 2 and 68% overlap with Flood Zone 3
- Poplar Road (H257) (1.8ha) – 50% overlap with Flood Zone 2

6.9.61 Regarding surface water flood risk, none of the variable sites overlaps (>50%) with areas at risk of flooding from surface water from a 1 in 100 event.

6.9.62 Overall, in terms of climate change adaptation, whilst some of the variable sites under this option are within areas of Flood Zone 2 and/or 3, it is recognised that many of these sites are relatively small. Therefore, **neutral effects** are predicted.

Water quality

6.9.63 Four sites overlap with a groundwater SPZ:

- Sun Street, Haworth (H312) (1.2ha) – 100% overlap
- Sun Street (H313) (1.9ha) – 91% overlap
- Thornton Road (H1238) (0.4ha) – 15% overlap
- Lyon Road (H1119) (2.7ha) – 9% overlap

6.9.64 Given the relatively small size of these sites, and that only two have a notable overlap (>50%), **neutral effects** are predicted in this regard. Likewise, wider impacts relating to water quality are predicted to be neutral.

Air quality

6.9.65 This option has similar effects to RA1A given that it locates growth in accessible urban locations. Whilst none of the variable sites under this option are adjacent to an AQMA, it involves urban greenfield loss, which moderates the positives to an extent by reducing the capacity of the urban area to cope with air pollution (these effects are marginal though).

6.9.66 Overall, **minor positive effects** are still predicted but with an added degree of uncertainty.

Land, soil, minerals and waste

6.9.67 In terms of the potential need for ground remediation, 12 of the variable sites overlap with a historical landfill site. This is the third lowest number of sites when comparing all the options.

6.9.68 Focusing on BMV agricultural land (i.e. Grades 1-3a), only 7 variable sites overlap with Grades 1-3 agricultural land (less than 11.5ha in total). The total loss is therefore relatively low.

6.9.69 Most of the variable sites overlap with MSAs. However, it is noted that by focusing on mixed and greenfield sites, some of these sites (i.e. the mixed sites) have likely already led to mineral sterilisation via previous development. Nevertheless, this option is considered to perform less favourably than option RA1A given that it involves greater levels of greenfield land.

6.9.70 In terms of waste, collection and management facilities will need to be expanded to accommodate the anticipated increase in waste from new households. There are no known issues in this regard, and the compact urban strategy should help to ensure that collection routes are efficient.

6.9.71 Overall, this option will lead to a greater loss of greenfield land compared to option RA1A. However, it is recognised that urban greenfield / mixed land is unlikely to be in agricultural use despite some being predicted to be BMV. In addition, this option does not include Green Belt or Grey Belt sites and therefore reduces potential BMV land loss in this respect. In light of this, only **minor negative effects** are anticipated.

RA2A – Urban edge expansion around Bradford

Addressing the causes of climate change

6.9.72 In terms of climate change mitigation, accessibility of the variable sites included under this option to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme. To recap, all variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all but one site are within walking distance of the nearest PRoW.

6.9.73 Overall, by focusing additional growth at sites on the urban edge of Bradford (the Regional City), this option is likely to perform positively from a climate change mitigation standpoint. This is because Bradford has the best sustainable transport options which provide access to the city's widespread services and facilities. In the longer term it could also help to support wider regeneration activities and build upon intended mass transit corridors. However, growth on peripheral sites will require new supporting infrastructure that will involve a greater carbon cost in terms of construction. On balance, **minor positive effects** are predicted at this stage.

Climate change adaptation

6.9.74 Focusing next on climate change adaptation, none of the variable sites overlap (>50%) with Flood Zone 2 and/or 3. Similarly, none of the variable sites overlaps (>50%) with areas at risk of flooding from surface water from a 1 in 100 event. As such, **neutral effects** are noted.

Water quality

6.9.75 None of the sites overlap with a groundwater SPZ and therefore neutral effects are anticipated in this regard.

6.9.76 More broadly, this option focuses growth around Bradford and could facilitate a coordinated approach to drainage and infrastructure planning.

6.9.77 However, it relies heavily on urban extensions and the development of greenfield land, resulting in the loss of natural drainage functions and increased runoff potential. On balance, these effects are not expected to be significant following routine mitigation. Overall, **neutral effects** are predicted, taking a precautionary approach.

Air quality

6.9.78 This approach concentrates growth around Bradford Regional City where access to employment, public transport and services is greatest, and where future mass transit investment could support modal shift.

6.9.79 However, benefits are moderated by the fact that urban extensions may still generate significant car-based travel and result in the loss of some undeveloped land which currently contributes to local air quality regulation. Nonetheless, residual growth would be directed away from areas currently suffering from poor air quality, and none of the variable sites under this option are adjacent to an AQMA. On balance, **minor positive effects** are considered likely.

Land, soil, minerals and waste

6.9.80 In terms of the potential need for ground remediation, eight of the variable sites overlap with a historical landfill site. This is the second lowest number of sites when comparing all the options.

6.9.81 Focusing on BMV agricultural land (i.e. Grades 1-3a), 16 variable sites overlap with Grades 1-3a agricultural land (totalling approximately 51ha). For several of these sites, the loss is very small and could potentially be avoided given that the degree of overlap with the site area is limited. For others, there is a 100% overlap.

6.9.82 Regarding MSAs, all but one of the variable sites overlap (>50%) with MSAs. In this respect, this option could lead to the sterilisation of mineral resources. However, it is recognised that given the large coverage of MSAs across the district, it is difficult to avoid development on MSAs, particularly given the availability of suitable sites.

6.9.83 In terms of waste, collection and management facilities will need to be expanded to accommodate the anticipated increase in waste from new households. There are no known issues in this regard, and the compact urban strategy should help to ensure that collection routes are efficient.

6.9.84 This option will likely lead to the loss of approximately 50ha of best and most versatile agricultural land (With approximately 42 ha being Grade 3a). All but one of the variable sites overlap with an MSA. Nevertheless, it is noted that by focusing on the urban edge of Bradford, these sites are less likely to be suitable for mineral extraction due to their proximity to existing development on the settlement edge. Nevertheless, this option is considered to perform less favourably than options RA1A and RA1B in this respect. **Minor negative effects** are considered likely at this stage.

RA2B – Urban edge expansion across the District

Addressing the cause of climate change

6.9.85 In terms of climate change mitigation, accessibility of the variable sites included under this option to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme. To recap, all but two of the variable sites included under this option are within walking distance (<800m) of a bus stop. Whilst several sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Regarding active travel, all but one site are within walking distance of the nearest PRoW.

6.9.86 Overall, by focusing additional growth at sites on the urban edge of all settlements, this option is likely to perform less positively from a climate change mitigation standpoint.

6.9.87 This is because some of these settlements have poorer sustainable transport options when compared to Bradford (the Regional City). Nevertheless, **neutral effects** are predicted given the good accessibility of the variable sites under this option.

Climate change adaptation

6.9.88 Focusing next on climate change adaptation, the following variable sites overlap (>50%) with Flood Zone 2 and/or 3:

- Lower Holme Mill, Otley Road (H1009) (0.2ha) – 100% overlap with Flood Zone 2 and 3
- Lower Holme Mill, Otley Road (H1009) (0.5ha) – 100% overlap with Flood Zone 2 and 3
- Bradford Road, Sandbeds, Keighley (H421) (1.5ha) – 100% overlap with Flood Zone 2
- Dowley Gap Lane (1) (H79) (0.8ha) – 94% overlap with Flood Zone 2
- Lyon Road (H1119) (2.7ha) – 81% overlap with Flood Zone 2 and 68% overlap with Flood Zone 3

6.9.89 Regarding surface water flood risk, none of the variable sites overlaps (>50%) with areas at risk of flooding from surface water from a 1 in 100 event.

6.9.90 In terms of climate change adaptation, several of the variable sites under this option are within areas of Flood Zone 2 and/or 3. However, it is noted that all but one of these sites are relatively small (<2ha) and the sequential and exception tests required by national planning policy will ensure development does not come forward where it would be at / increase flood risk. It is also worth noting that not all the sites would be required to meet housing needs under this approach, and thus the more sensitive sites could be avoided.

6.9.91 Considering the above, **neutral effects** are anticipated at this stage, however a degree of uncertainty is noted regarding which sites may be taken forward under this option.

Water quality

6.9.92 This option distributes growth across a wider range of settlements and catchments. Whilst this could reduce the concentration of development pressure in any one location, it would also result in the loss of greenfield land across a broader area. Given that standard drainage and pollution-control measures would be expected, there is not a clear basis for concluding that this option would perform materially better or worse than other urban extension approaches.

6.9.93 Only two sites overlap with a groundwater SPZ: Lyon Road (H1119) (2.7ha) with a 9% overlap and West Lane (H41) (8.1ha) with a 10% overlap. Whilst this presents some site-specific constraints, these are not considered to be significant at a strategic level. Consequently, **neutral effects** are predicted.

Air quality

6.9.94 None of the variable sites under this option are adjacent to an AQMA. The dispersal of residual growth to urban edge sites also reduces exposure to existing hotspots of poor air quality. However, a more important factor for this option is that residual growth is distributed across a wider range of settlements and is less closely aligned with the district's strongest public transport corridors (and is likely to result in longer and more frequent car-based trips). As such, **neutral effects** are predicted overall.

Land, soil, minerals and waste

6.9.95 In terms of the potential need for ground remediation, 20 of the variable sites overlap with a historical landfill site. This is the highest number of sites when comparing all the options. However, not all sites would be involved for this option.

6.9.96 Focusing on BMV agricultural land (i.e. Grades 1-3a), 33 variable sites overlap with Grades 1-3a agricultural land. This is the highest number of sites with this overlap when comparing all the options. Whilst it is also important to note that not all sites would need to come forward to meet housing needs, dispersal to settlements that contain sensitive land would mean that some loss is inevitable. However, there is some flexibility in site selection, so it is likely that less BMV agricultural land would be affected compared to option RA2A and the PO. Nonetheless, **minor negative effects** are predicted overall owing to the large amount of greenfield land that would still be lost and likelihood that at least 20ha would be BMV.

6.9.97 Regarding MSAs, over half of the variable sites overlap (>50%) with MSAs. In this respect, this option could lead to the sterilisation of mineral resources. However, it is recognised that given the large coverage of MSAs across the district, it is difficult to avoid development on MSAs, particularly given the availability of suitable sites.

6.9.98 In terms of waste, collection and management facilities will need to be expanded to accommodate the anticipated increase in waste from new households. There are no known issues in this regard.

RA2C - Urban edge expansion without reliance on Regeneration Areas

Addressing the causes of climate change

6.9.99 This option proposes a similar pattern of growth to RA2A, but it can be assumed that dispersal to a greater number of greenfield sites would be involved, both increasing the likelihood of car-based travel for some growth as well as increasing embodied carbon implications. As such, **minor negative effects** are predicted.

Climate change adaptation

6.9.100 Effects are similar are similar to RA2B – but there would be less flexibility to avoid the most sensitive sites – for example in terms of flood risk. Also, a greater amount of greenfield land would be lost overall, which could have cumulative effects in terms of resilience (though comprehensive masterplanning and modern drainage solutions could help to improve resilience in some cases depending on design).

6.9.101 As such, **neutral effects** are predicted, with an element of uncertainty.

Water quality

6.9.102 This option would increase the amount of greenfield development overall and the associated loss of natural drainage and protective functions. However, assuming routine mitigation is applied, effects are not expected to differ significantly from RA2B. Overall, **neutral effects** are predicted.

Air quality

6.9.103 The effects would be similar to RA2B but would likely result in a greater reliance on greenfield development and road-based travel. From an air quality perspective, this option therefore performs less well, but is not considered to justify a change in the significance category. As such, **neutral effects** are predicted.

Land, soil, minerals and waste

6.9.104 This option would derive similar effects to RA2B given that the portfolio of sites involved is the same. However, a greater amount of greenfield land is presumed, and this also reduces the ability to avoid some of the more valuable soil resources and there would also be a greater overall level of Greenfeld land lost. Consequently, a **moderate negative effect** is predicted.

RA3A: Grey Belt-led strategy

Addressing the causes of climate change

6.9.105 In terms of climate change mitigation, accessibility of the variable sites included under this option to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme.

6.9.106 This option is likely to perform less positively from a climate change mitigation standpoint. This is because some of these sites are on the edge of settlements which have poorer sustainable transport options when compared to Bradford (the Regional City). Therefore, **neutral effects** are predicted.

Climate change adaptation

6.9.107 Focusing next on climate change adaptation, only one variable site overlaps (>50%) with Flood Zone 2 and/or 3, namely Dowley Gap Lane (1) (H79) (0.8ha) which has a 94% overlap with Flood Zone 2.

6.9.108 Regarding surface water flood risk, none of the variable sites overlaps (>50%) with areas at risk of flooding from surface water from a 1 in 100 event.

6.9.109 In light of the above, **neutral effects** are anticipated at this stage.

Water quality

6.9.110 Only one site overlaps with a groundwater SPZ – Brow Road (H336) (1.3ha) with a 100% overlap. There is sufficient choice of sites to avoid this location though.

6.9.111 More broadly, this option would result in the development of a range of Grey Belt sites across the district, leading to the loss of greenfield land and associated infiltration functions. Whilst some sites may be located within more sensitive catchments than others, effects are expected to be largely site-specific and capable of being managed through standard drainage measures. Overall, **neutral effects** are predicted.

Air quality

6.9.112 This option still provides a planned approach to growth (which is preferrable to ad hoc growth) but includes a wider range of sites, some of which may be less accessible to services, employment opportunities and public transport (given that grey belt categorisation is not driven by accessibility performance). Whilst some locations may avoid existing air quality hotspots (indeed, none of the variable sites under this option are adjacent to an AQMA), this is offset by the increased potential for private vehicle use. As such, **neutral effects** are predicted.

Land, soil, minerals and waste

6.9.113 In terms of the potential need for ground remediation, 18 of the variable sites overlap with a historical landfill site. This is the second highest number of sites when comparing all the options.

6.9.114 Focusing on BMV agricultural land (i.e. Grades 1-3a), 36 variable sites overlap with Grades 1-3a agricultural land. Whilst this is the second highest number of sites that overlap with agricultural land, not all would be required to bring forward the strategy. Nonetheless, the dispersed approach to grey belt release would likely give rise to **minor negative effects** in terms of absolute greenfield land loss and a proportion of this likely being best and most versatile land.

6.9.115 Regarding MSAs, over half of the variable sites overlap (>50%) with MSAs. In this respect, this option could lead to the sterilisation of mineral resources. However, it is recognised that given the large coverage of MSAs across the district, it is difficult to avoid development on MSAs, particularly given the availability of suitable sites.

6.9.116 In terms of waste, option RA3A delivers the highest level of growth. It is noted that regardless of the level of development that comes forward, waste collection and management facilities will need to be expanded to accommodate the anticipated increase in waste from new households.

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

Addressing the causes of climate change

6.9.117 This option proposes a similar pattern of growth to RA3A, but it can be assumed that dispersal to a greater number of greenfield sites would be involved, both increasing the likelihood of car-based travel for some growth as well as increasing embodied carbon implications. As such, **minor negative effects** are predicted.

Climate change adaptation

6.9.118 Predicted effects for this option are considered to be broadly in line with option RA3A. As such, **neutral effects** are noted. Even with greater growth, the choice of unconstrained sites from a resilience / flooding perspective ought to mean that the effects are no more significant. A greater cumulative release of greenfield land could have some implications for resilience across urban fringes, but this is a marginal issue (especially when there will be a need to consider mitigation and enhancement as part of design).

Water quality

6.9.119 Only one site overlaps with a groundwater SPZ – Brow Road (H336) (1.3ha) with a 100% overlap. Despite there being a need to release additional sites, it would still be possible to avoid this site.

6.9.120 This option involves a greater reliance on additional Grey Belt sites to provide flexibility should regeneration delivery not occur as anticipated. Whilst this increases the overall amount of greenfield development, there is not sufficient evidence to conclude that water quality effects would be materially different from other options involving substantial greenfield release. Consequently, **neutral effects** are predicted.

Air quality

6.9.121 The effects would be similar to RA3A but would likely result in a greater reliance on greenfield development and road-based travel. From an air quality perspective, this option therefore performs less well, but is not considered to justify a change in the significance category. As such, **neutral effects** are predicted.

Land, soil, minerals and waste

6.9.122 This option would derive similar effects to RA3A given that the portfolio of sites involved is the same. However, a greater amount of greenfield land is presumed, and this also reduces the ability to avoid some of the more valuable soil resources. Consequently, a **moderate negative effect** is predicted (largely reflecting the substantial increase in greenfield release).

Comparison of options (Addressing causes of climate change)

6.9.123 RA1A performs most favourably as it maximises the use of previously developed land within existing urban areas, makes greatest use of existing infrastructure, minimises infrastructure-related embodied carbon and is most likely to support sustainable travel patterns. However, whilst the strongest-performing option, the benefits are not considered sufficiently transformational to justify a major positive effect. It is also worth noting that this option does not meet identified needs in full so an element of incremental growth would occur. RA1B performs similarly given its concentration of growth in the urban areas, but it involves a greater loss of greenfield land and is likely to involve greater embodied carbon implications.

6.9.124 RA2A performs positively, by concentrating growth around Bradford Regional City where opportunities for public transport use, active travel and access to employment are generally greatest.

6.9.125 This is moderated by a greater reliance on greenfield development and associated infrastructure requirements (and associated embodied carbon).

6.9.126 The Preferred Option also performs positively overall, whilst it disperses some growth to other settlements, it retains a substantial focus on Bradford and Regeneration Areas and continues to direct development towards locations that are generally accessible by sustainable modes. Its reliance on greenfield development reduces the magnitude of benefits when compared to the strongest-performing options though.

6.9.127 RA2B and RA3A are considered to be broadly neutral. Whilst both represent planned approaches to growth and therefore perform more favourably than an unmanaged development scenario, they disperse growth more widely across the district and include a greater proportion of locations where sustainable travel opportunities are comparatively weaker. Any mitigation benefits are therefore more limited and balanced by increased infrastructure requirements and associated embodied carbon.

6.9.128 RA3B and RA2C perform least favourably. Whilst still representing a plan-led approach, the reduced reliance on regeneration areas and greater dependence on additional peripheral allocations is likely to result in a more dispersed pattern of development, increased infrastructure provision and a greater reliance on less accessible locations. Consequently, minor negative effects are considered likely for both options.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
+	++	++	+	0	-	0	-

Comparison of options (Climate Change Adaptation)

6.9.129 All options include the same constant sites, which establish a degree of baseline flood risk exposure associated primarily with regeneration opportunities within the urban area. Consequently, the distinction between options relates to the extent to which the variable sites are affected by flooding constraints and a loss of greenfield land.

6.9.130 RA2A performs most favourably, as none of the variable sites are substantially affected by Flood Zones 2 or 3. This reduces the likelihood that site delivery would be constrained by flood risk and minimises reliance on mitigation measures. However, as the option does not actively improve existing levels of flood resilience, a **neutral effect** is predicted.

6.9.131 RA3A and RA3B perform similarly well, with only a single significantly flood-constrained site identified under either option. Whilst these options involve greater greenfield release than some alternatives, this does not materially worsen flood risk exposure when considered at the strategic scale of appraisal. Therefore, **neutral effects** are predicted.

6.9.132 The Preferred Option performs slightly less favourably than some of the options, but remains **neutral** overall. Flood risk constraints are limited to a small number of sites and there appears to be sufficient scope for avoidance and mitigation through masterplanning and site design.

6.9.133 RA1B and RA2B both contain a number of sites affected by flood risk although not to an extent that would be expected to generate significant adverse effects. Furthermore, policy safeguards and site-level mitigation are expected to reduce residual risks. Therefore, neutral effects are predicted.

6.9.134 RA2C is considered to be less favourable than RA2B. Although the pattern of flood risk constraints is broadly similar, the option provides less flexibility to avoid the most constrained sites because a greater proportion of the site portfolio would likely be required to meet development needs.

6.9.135 This introduces a greater risk that development may need to be accommodated in less resilient locations (as well as an overall increase in greenfield development). Though a **neutral effect** is still predicted, this comes with a greater element of uncertainty.

6.9.136 RA1A performs least favourably overall. Unlike the other options, it contains a notable concentration of sites with substantial overlaps with Flood Zones 2 and 3, including several sites almost entirely within areas of flood risk. Whilst

national policy and mitigation measures would still apply, the scale and concentration of constraints in the urban area are sufficient to distinguish this option from the others and justify a **minor negative effect**.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
0	-	0	0	0	0?	0	0

Comparison of options (Water resources)

6.9.137 The location of growth within different parts of the district may influence water quality effects. Development within upland catchments has the potential to affect natural runoff processes and receiving watercourses closer to their source, whilst development within lower-lying urban catchments may place greater pressure on existing drainage and wastewater infrastructure. However, these effects are likely to be highly dependent on site-specific circumstances and are not considered sufficient, at this strategic stage, to materially alter the relative performance of the options.

6.9.138 There are relatively limited differences between the options in relation to water quality. Whilst the extent of greenfield land loss varies between options, all would be subject to policy-compliant drainage and pollution-control measures. The principal distinction relates to RA1A, which focuses growth on previously developed land and therefore results in the least loss of natural infiltration and runoff attenuation functions.

6.9.139 Beyond this, the assessment does not identify a clear basis for concluding that more dispersed options would perform materially worse than more concentrated urban extension options, as both approaches have the potential to generate localised pressures on drainage infrastructure and receiving watercourses. Though there are some minor differences between the options in terms of sites falling within Groundwater Source Protection Zones, these issues are not major differentiators. Consequently, all options are considered likely to result in broadly neutral effects, with RA1A performing most favourably overall and having potential minor positive effects.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
0	+?	0	0	0	0	0	0

Comparison of options (Air quality)

6.9.140 RA1A and RA2A perform most favourably overall (though the differences are marginal), although for different reasons. RA1A benefits from its focus on urban intensification, previously developed land and proximity to existing services and facilities. RA2A benefits from concentrating growth around Bradford Regional City, where opportunities for public transport use, strategic transport investment and potential future mass transit provision are greatest. However, positive effects are moderated by the recognition that urban extensions can remain car dependent in practice and that modal shift cannot be assumed. RA1B performs well for similar reasons to RA1A, but the benefits are moderated by the loss of greenfield land in the urban area.

6.9.141 The Preferred Option also performs positively, combining a Bradford-focused strategy with growth elsewhere in the settlement hierarchy. Whilst this reduces the concentration of growth around the district's most accessible location, it also avoids an excessive reliance on dispersed development and retains a strong regeneration component, it also avoids over concentration of growth in areas where road traffic already contributes towards air quality tensions.

6.9.142 RA2B, RA2C, RA3A and RA3B are all considered likely to lead to broadly neutral effects. Whilst these options may disperse growth away from some existing air quality hotspots, they are also likely to generate a greater proportion of journeys by private car and provide weaker opportunities to support strategic public transport investment and wider modal shift. The effects are considered to be neutral, because in the absence of a plan-led strategy, development would still be expected to come forward, but in a less coordinated manner. Consequently, all of these plan-led options are considered likely to perform more favourably than an unmanaged pattern of growth with regards to air quality.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
+	+	+?	+	0	0	0	0

Comparison of options (Land, soil, minerals and waste)

6.9.143 Though this topic covers a range of factors, the key determinant of effects relates to the loss of greenfield land and the potential loss of best and most versatile agricultural land. Mineral sterilisation is also a consideration, but it provides limited differentiation between options due to the extensive coverage of mineral safeguarding areas across the district.

6.9.144 Likewise, the potential for sites to be affected by and require remediation is a marginal comparator, but useful for identifying where enhancements could arise. In terms of waste, this is not considered a major differentiator as whilst higher growth options will result in a higher quantity of waste generation, it is assumed that waste collection and management facilities will be expanded in line with the level of development which is anticipated to come forward.

6.9.145 RA1A performs most favourably as it focuses on previously developed land and maximises opportunities for land remediation and re-use.

6.9.146 All other options result in some degree of greenfield land loss and potential loss of agricultural land, leading to negative effects overall. However, the majority can reasonably be characterised as minor negative given that the majority of growth is planned in urban locations and PDL is an important component of each strategy. Of all the lower growth options, the preferred option performs least well, as it involves considerable amounts of Grade 2/3a BMV. Option RA1B performs relatively well, as the loss of greenfield (whilst negative) is mostly on poorer quality soils.

6.9.147 Alongside the PO, the strongest adverse effects are associated with RA2C and RA3B, where additional allocations are required to reduce reliance on regeneration delivery. This increases the overall amount of greenfield land involved, but there still remains flexibility to avoid BMV, which is still more favourable compared to the PO. These factors balance so that all three options perform similarly.

PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
--	0	-	-	-	--	-	--

6.10 Summary of appraisal findings

6.10.1 The appraisal identifies a number of clear trade-offs between the reasonable alternatives. Options that focus residual growth within existing urban areas, particularly **RA1A** and **RA1B**, generally perform most favourably in relation to accessibility, transport, climate change mitigation, efficient use of land and the protection of landscape, biodiversity and heritage assets. However, these options may provide less flexibility to accommodate future growth and rely more heavily on urban capacity and regeneration opportunities.

6.10.2 At the other end of the spectrum, **RA2C** and **RA3B** perform strongly in relation to housing delivery and economic growth by providing the greatest level of flexibility and capacity for development. However, these benefits are generally accompanied by greater environmental effects and a higher likelihood of development occurring in less accessible locations, with associated implications for transport and infrastructure.

6.10.3 **RA2B** and **RA3A** represent intermediate approaches, distributing growth more widely across the district. These options provide opportunities to support a broader range of settlements and local services, but the benefits are moderated by lower levels of accessibility and increased environmental effects relative to more urban-focused options.

6.10.4 The **Preferred Option** and **RA2A** also occupy a middle position within the assessment. Both perform positively across a broad 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 arising from urban extensions and greenfield land release. The Preferred Option performs comparatively poorly against the soils objective, reflecting the extent of Best and Most Versatile agricultural land likely to be affected. As a result, whilst both options continue to perform relatively well overall, their environmental performance is not uniformly stronger than the more dispersed alternatives. However, this is balanced against stronger performance in terms of accessibility and socio-economic effects.

6.10.5 Overall, no single option performs most favourably against all objectives. The relative performance of the alternatives therefore reflects differing balances between growth, accessibility, infrastructure capacity and environmental protection.

Table 6.1: Summary of strategic alternatives appraisal

IA Topic / Objectives	PO	RA1A	RA1B	RA2A	RA2B	RA2C	RA3A	RA3B
1. Communities, population and housing (Housing)	+++ ?	++	+++ ?	+++ ?	+++ ?	+++	+++ ?	+++
2. Communities, population and housing (Equalities)	+++?	++	++	+++?	+++?	+++?	+++?	+++?
3. Health and Wellbeing (Positive effects)	++	++ ?	++	++	++	++	++	++
3. Health and Wellbeing (Negative effects)	-	-	--?	-	-	--	-	--
4. Employment and Economy	+++	++	+++	+++	++	+++	++	+++
5.Natural Environment (Landscape and townscape)	--	0	--	--	--?	---	-	--
6.Natural Environment (Biodiversity)	-	+	-	-	--	---	--	---
7.Built Environment (Heritage)	-	+	-	-	--	--	-	--
8. Connectivity (Transport)	+?	++	++	+	0	-	0	-
9.Connectivity (Sustainable community growth)	+++	+++	++	++	++	++	++	++
10.Climate and Resources (Addressing causes of climate change)	+	++	++	+	0	-	0	-
11.Climate and Resources (Climate change resilience)	0	-	0	0	0	0?	0	0
12.Climate and Resources (Land, soil, minerals and waste)	--	0	-	-	-	--	-	--
13.Climate and Resources (Water)	0	+?	0	0	0	0	0	0
14.Climate and Resources (Air quality)	+	+	+?	+	0	0	0	0

+++	Major positive	++	Moderate positive	+	Minor positive	0	Neutral	-	Minor negative	--	Moderate negative	---	Major negative

6.11 Reasons for selecting the preferred strategy

6.11.1 The Council has selected the preferred strategy as it is considered to provide the most balanced and sustainable approach to accommodating the District's housing needs over the plan period. The strategy focuses growth in the most sustainable locations, making best use of regeneration opportunities and previously developed land, while supporting economic growth, infrastructure provision and the continued vitality of settlements across the district. The council considers that this approach enables housing needs to be met whilst balancing the potential environmental, social and economic effects associated with growth.

6.11.2 The preferred strategy directs the majority of growth to Bradford and Shipley, followed by Keighley, reflecting their role within the settlement hierarchy and their capacity to accommodate growth. This approach supports the delivery of regeneration objectives by bringing forward opportunities for housing-led renewal, making efficient use of previously developed land and helping to address identified housing and economic needs within the District's urban areas. Growth is also distributed to other district's towns and villages at a proportionate scale, enabling local housing needs to be met whilst helping to maintain the vitality and viability of communities. The resulting pattern of development balances the benefits of urban-focused regeneration with the need to support sustainable growth across the District as a whole.

6.11.3 The Council considered options focused primarily on urban intensification and previously developed land (RA1A and RA1B). These alternatives performed positively against a number of environmental objectives, particularly biodiversity, landscape and the historic environment, as they reduced the need for greenfield and / or Green Belt release. However, the appraisal identified limitations in terms of flexibility, deliverability and the distribution of growth across the District. Both options relied heavily on the delivery of regeneration and previously developed sites within the urban area and provided fewer opportunities to accommodate growth within smaller towns and villages. As a result, they were less able to support local housing needs across all settlements and would provide a narrower range and choice of housing types and tenures. The Council therefore concluded that an approach relying predominantly on urban land would not provide the same degree of flexibility or resilience in maintaining a deliverable supply of land over the Plan period.

6.11.4 The Council also considered options focused on urban-edge expansion around Bradford (RA2A) and more widely across the district (RA2B and RA2C). Whilst these approaches would provide additional flexibility and perform positively in relation to housing delivery, they may require greater levels of Green Field and Green Belt land release, depending on which sites selected and their capacity to meet housing needs.

6.11.5 In the case of the more dispersed options, RA2B and RA2C would also direct a greater proportion of growth towards locations with lower levels of accessibility and fewer services and facilities.

6.11.6 The appraisal found that these dispersed alternatives were also generally associated with greater adverse effects in relation to landscape character, biodiversity, heritage and connectivity (though they perform better in terms of agricultural land). The preferred strategy therefore seeks to achieve a more proportionate balance between housing delivery, regeneration objectives and environmental protection by avoiding an excessive concentration of growth on urban-edge locations whilst still making provision for urban extensions where justified.

6.11.7 The Grey Belt-led alternatives (RA3A and RA3B) would provide a substantial supply of development opportunities and increased flexibility. However, the appraisal identified that these approaches could result in greater dispersal of growth, and wider environmental impacts, particularly in relation to biodiversity, landscape and the character of settlements. Although the Council recognises the role that Grey Belt land can play in meeting development needs, it does not consider that a strategy primarily driven by Grey Belt release would provide the most sustainable pattern of development or best support the regeneration ambitions that form a key objective of the Local Plan. The preferred strategy instead utilises Green Belt and Grey Belt releases selectively where required, following the prioritisation of previously developed land and other sustainable opportunities.

6.11.8 The Council also considered higher-growth alternatives through a number of the reasonable alternatives. Whilst these options could deliver additional housing, the Council concluded that higher levels of growth are not necessary to meet identified development requirements and would increase pressure on environmental assets, infrastructure and services. The preferred strategy provides sufficient land to meet housing requirements, supports the maintenance of a deliverable housing land supply and provides flexibility through allocations, commitments, windfalls and regeneration opportunities, whilst avoiding the additional adverse impacts associated with a significantly higher level of growth.

6.11.9 Overall, the Council considers that the preferred strategy represents the most appropriate balance between housing growth, regeneration, infrastructure provision and environmental protection. Whilst some alternatives perform more strongly against individual sustainability objectives, the preferred strategy provides the most effective overall response to the Plan's vision and objectives by directing growth towards the district's most sustainable locations, supporting transformational regeneration, maintaining the vitality of towns and villages, and providing a deliverable framework for meeting identified needs across the plan period.

Part 2: What are the IA findings at this stage?

7. Introduction (to Part 2)

7.1.1 This part of the report presents the findings of the appraisal of the Local Plan. The appraisal considers the likely effects of the Plan against the IA Framework, concluding on the significance of predicted effects when considering the Plan ‘as a whole’.

7.1.2 This part of the report also draws together the mitigation and enhancement measures identified through the IA process and outlines the next steps in both the plan-making and IA processes, including potential measures for the monitoring of the significant effects.

8. Appraisal of the Local Plan

8.1 Introduction

8.1.1 This section presents an appraisal of the Local Plan considered 'as a whole' (i.e. the proposed strategy including site allocations and all the supporting policies that will shape future development).

8.2 Approach and methodology

8.2.1 For each IA topic, the appraisal first considers the likely effects associated with the scale and spatial distribution of growth proposed through the Plan, including the cumulative effects arising from proposed site allocations and strategic policies. The appraisal then considers all the supporting policies before reaching an overall conclusion on the likely effects for each IA topic. Where IA topics contain several IA objectives that are markedly different in their focus, the overall impacts are predicted against each objective (rather than concluding on an IA Topic as a whole). This is particularly important for the natural resources theme, which contains several interlinked objectives that each has a distinct focus.

8.2.2 The appraisal has been undertaken on a whole-plan basis. Whilst all policies have been considered, the findings are presented by IA topic/objective rather than as individual policy appraisals. This reflects the fact that policies should be read and implemented as part of the wider Plan rather than in isolation. The appraisal therefore considers the interactions between policies, including cumulative and synergistic effects, as well as the extent to which policies may mitigate or enhance the effects of other policies and proposals within the Plan. References to individual policies are included where these are particularly important in influencing the appraisal findings. This is a proportionate and appropriate approach to appraisal.

8.2.3 In determining the significance of effects, professional judgement has been applied having regard to the characteristics of effects identified in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 and relevant IA guidance. Consideration has been given, where relevant, to the magnitude, duration, frequency, likelihood, permanence and timescale of effects, together with the potential for cumulative and synergistic effects arising from the interaction of policies and proposals within the Plan. The appraisal also considers the relationship between the Local Plan and other relevant plans, programmes and strategies that may influence baseline conditions or the significance of effects.

8.2.4 The appraisal has been informed by a range of qualitative and spatial evidence sources, including:

- Baseline information, trends and key sustainability issues identified through the IA Scoping Report;
- Geographical Information Systems (GIS) analysis to identify spatial features, environmentally sensitive areas, and relationships between development locations and likely effects;
- Supporting technical evidence prepared to inform the Local Plan;

- Consultation responses received throughout the plan-making and appraisal process, where relevant.

8.2.5 The characteristics of effects are discussed proportionately within the appraisal and only where they are relevant to conclude on the significance of effects. As discussed above, it is not considered to be appropriate to conclude on the significance of effects for individual elements of the Plan (i.e. for individual policies). It can therefore be assumed that where effects have not been discussed within the appraisal text for certain policies, that these were not important factors in determining overall significance. Likewise, it is not proportionate or necessary to go through a 'tick box' exercise for every effect characteristic to conclude on significance.

8.2.6 Taking account of the above considerations, a conclusion is reached on the likely significance of effects for each IA topic. Effects are recorded in a summary table at the end of Chapter 8 using the scale below, ranging from neutral to major positive or major negative. It is possible for both positive and negative effects to be recorded against the same IA topics/ objectives. This reflects the potential for different effects to arise in terms of who they affect, and what locations are affected. Where there is a clear need to differentiate between negative and positive effects this has been applied to the assessment topics as appropriate. This avoids negative or positive effects not being presented transparently / the potential for effects to be 'hidden' by an overall conclusion. In some instances, though, it is more appropriate to conclude on the broad direction of travel of impacts, because there are no significant differences between the locations/ assets / community groups affected.

Likely effect	Colour and symbol
Major positive	+++
Moderate positive	++
Minor positive	+
Neutral	0
Major negative	---
Moderate negative	--
Minor negative	-
Uncertainty	?

8.2.7 The full list of plan policies is set out in **Table 8.1** below for reference.

Table 8.1 Local Plan policies

Policy reference	Policy title
SS1	Spatial Strategy
SS2	Growth Requirements
ST1	Delivering Sustainable Development
ST2	Sustainable Movement and Connectivity
ST3	Climate Resilience, Environmental Sustainability and Resource Use
ST4	Creating Well Designed and Healthy Places
ST5	Green Belt
ST6	Strategic Green and Blue Infrastructure Network
HO1	Housing Delivery
HO2	Housing Density
HO3	Housing Mix
HO4	Affordable Housing
HO5	Self-Build and Custom Build Housing
HO6	Support and Specialist Accommodation
HO7	Gypsy and Traveller and Travelling Showpersons Accommodation
HO8	Housing Design Standards
HO9	Empty Homes and Overcrowding
HO10	Houses in Multiple Occupation
EC1	Employment Sites
EC2	Employment Zones
EC3	Employment Skills and Delivery
EC4	Sustainable Tourism and the Visitor Economy
TC1	Hierarchy of Centres and Growth Needs
TC2	Development within Designated Centres
TC3	Out of Centre Development
TC4	Hot Food Takeaways and Fast Food Outlets
TR1	Safeguarding
TR2	Integrating Sustainable Transport and Development
TR3	Parking
TR4	Walking and Cycling
TR5	Freight and Logistics
TR6	Aircraft Safety

Policy reference	Policy title
DS1	Design Processes
DS2	Landscape Design
DS3	Urban Character and Form
DS4	Street Design
SC1	Community Facilities and Infrastructure
SC2	Cemetery and Burial Provision
SC3	Education Infrastructure
SC4	Provision of Health Infrastructure
SC5	Sports and Recreation Provision
SC6	Digital and Telecommunications Connectivity
CR1	Air Quality
CR2	Environmental Protection
CR3	Renewable and Low Carbon Energy
CR4	Flood Risk and Water Management
NE1	Green and Blue Infrastructure Standards
NE2	Open Space, Play, Sport and Recreation
NE3	Protecting the South Pennine Moors SPA / SAC
NE4	Biodiversity and Geodiversity
NE5	Biodiversity and Development (inc. Net Gain)
NE6	Trees, Woodlands and Hedgerows
NE7	Landscape Character and Sensitivity
NE8	Development in the Countryside
NE9	Development in the Green Belt
HE1	Historic Environment
MIN1	Planning for Minerals
MIN2	Minerals Supply and Landbanks
MIN3	Mineral Safeguarding
MIN4	Mineral Infrastructure Safeguarding (Strategic Policy)
MIN5	Mineral Allocations
MIN6	Minerals Areas of Search
MIN7	Proposals for New or Extended Mineral Sites
MIN8	Mineral Site Restoration, Aftercare and Afteruse
MIN9	Oil and Gas (Hydrocarbon) Exploration and Production

Policy reference	Policy title
MIN10	Coal Extraction
WAS1	Planning for Sustainable Waste Management (Strategic Policy)
WAS2	Waste Management Allocations
WAS3	Safeguarding Waste Management Facilities and Infrastructure
WAS4	Proposals for Waste Management Development
WAS5	Waste Management Within Development
BCC1	Bradford City Centre
BNE1	Bradford North East
BNW1	Bradford North West
BSE1	Bradford South East
BSW1	Bradford South West
SP1	Shipley
BA1	Baildon
BI1	Bingley
CO1	Cottingley
EM1	East Morton
KY1	Keighley
SI1	Silsden
SE1	Steeton with Eastburn
CU1	Cullingworth
DH1	Denholme
HR1	Harden
HA1	Haworth and Cross Roads
OA1	Oakworth
OX1	Oxenhope
QB1	Queensbury
TH1	Thornton
WI1	Wilsden
AD1	Addingham
BU1	Burley in Wharfedale
IL1	Ilkley
ME1	Menston
ID1	Development Contributions
ID2	Infrastructure Delivery

8.3 Communities, population and housing

IA Objectives

- **1a Housing** – To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups.
- **2a Equality** – To support equality and diversity, whilst promoting social cohesion, encouraging participation and improving the quality of life (particularly in deprived neighbourhoods).

Growth strategy and allocations

8.3.1 The growth strategy (Policy SS2) performs well by seeking to deliver 33,669 homes over the 18-year plan period. A range of housing sites are allocated to provide flexibility and choice in meeting housing needs, whilst a large proportion of sites are also committed / within the urban area and likely to be developed in the short to medium term. A proportion of dwellings (6000) are expected to come forward in Regeneration Areas within Bradford Keighley and Shipley. Though the Council is being proactive and is confident that growth will arise in these locations, there is a risk that such levels of growth might not be achieved without substantial investment and partnership working. This creates a degree of uncertainty.

8.3.2 The growth strategy also includes 110.5ha of new employment land and almost 29,000 jobs over the plan period. In doing so, the growth strategy seeks to meet the needs of all residents in the district as well as balancing employment with housing.

8.3.3 There is an identified need for 54 pitches to provide for Gypsy and Traveller and Travelling Showpersons. The Plan does not allocate specific sites to address these needs, which provides a degree of uncertainty as to whether this element of accommodation will be delivered in practice. Nonetheless, there is criteria-based policy that will help to support delivery.

8.3.4 The delivery of affordable homes is particularly important given the shortage of affordable housing is identified as a major issue across both urban and rural areas. This is particularly prominent in Wharfedale, Airedale, the Worth Valley and some outlying suburbs of Bradford, where house prices are high. Affordability issues in the inner city largely correspond to areas where income levels are low. By delivering affordable homes in these parts of the district, the plan will help address existing affordability barriers. This is likely to support households who are unable to access suitable market housing and contribute towards reducing inequalities associated with access to housing.

8.3.5 The spatial strategy (Policy SS1) also focuses housing and economic growth, regeneration benefits and transformational physical change within the Broad Locations of Growth identified as Regeneration Areas of Bradford City Centre, Keighley, Shipley and Holme Wood. It also sets out a settlement hierarchy, with the Regional City of Bradford including Shipley, forming the first tier as the most sustainable settlement and the principal focus for housing, employment, retail, leisure, education, health and cultural activities and facilities in the district.

8.3.6 The second tier comprises the towns of Keighley, Ilkley, Bingley, Baildon, Queensbury and Silsden, which will see a proportionate level of growth reflective of their settlement size, roles and functions, environmental constraints and development opportunities. This approach is likely to support access to services, facilities, employment and public transport, while also supporting the regeneration and diversification of existing communities.

8.3.7 The distribution of growth is also relevant to addressing spatial inequalities across the district. The site allocations include locations within and around some of the more deprived communities in the district, with 19 sites overlap with an LSOA with an overall rank below 100, whilst a further 26 sites overlap with an LSOA with an overall rank below 500. The most deprived areas in the district include inner-city areas in Bradford, Manningham and Keighley. The distribution of allocations therefore provides opportunities for investment and regeneration within areas experiencing higher levels of deprivation, including through the delivery of new homes, affordable housing, employment opportunities and supporting infrastructure.

8.3.8 In this context, the strategy provides a broad distribution of housing growth across the district, including substantial growth in Bradford and Shipley, alongside growth within the principal towns and a range of villages. The benefits associated with housing growth, including affordable housing and supporting infrastructure, are therefore likely to be distributed across different communities. The focus on growth within and on the edge of existing urban areas, particularly locations with access to services, facilities, employment opportunities and public transport, is also likely to support equality of access to opportunities. This is particularly relevant for households and communities who may have more limited access to a private vehicle. However, the scale of growth proposed in some locations may also place additional pressure on existing services, facilities and infrastructure where provision does not come forward at an appropriate scale and time. The Plan's approach to coordinated infrastructure delivery is therefore important in ensuring that population growth is appropriately supported.

8.3.9 The scale of housing growth proposed may create risks relating to affordability pressures, displacement of existing residents and increased demand on community infrastructure if delivery is not carefully managed. There is also potential for rapid population growth to place pressure on community cohesion and local services.

8.3.10 The strategy is also anticipated to support equality through the relationship between housing and economic growth. Policy SS1 seeks to support inclusive and sustainable economic growth, including through investment in Bradford, regeneration areas and key settlements, while linking communities to jobs, skills, training and other economic opportunities. The focus on Bradford City Centre and the other Broad Locations for Growth provides opportunities for regeneration and physical transformation in areas where there are existing social and economic challenges, while the settlement hierarchy seeks to maintain the role of towns and villages as locations for local services and facilities. The delivery of employment land alongside housing growth is also likely to provide opportunities for residents to access employment locally, although the distribution and accessibility of employment opportunities will influence the extent to which these benefits are realised.

8.3.11 This is particularly important in Bradford South East, where E57 and E157 would complement planned housing and regeneration at Holme Wood, and at Esholt, where MDS2 would support employment growth within the wider Bradford–Leeds economic corridor.

8.3.12 The smaller allocations and intensification of existing Employment Zones would provide a broader distribution of employment opportunities across Bradford, Shipley, Keighley and other established employment locations.

8.3.13 With regards to equalities and employment provision, the distribution of benefits would depend on the nature of the employment created, recruitment practices and the accessibility of sites by sustainable modes. In this regard, Policy EC3 supports local employment, training, apprenticeships and workforce development, while Policies ID1 and ID2 provide mechanisms for securing employment and skills agreements and proportionate developer contributions. This should help align new development with Bradford's skills needs and improve access to opportunities for communities experiencing employment and skills deprivation. Nevertheless, the benefits will depend on the requirements of future occupiers and the effective implementation of these measures, and the Plan cannot ensure that all jobs will be taken by nearby residents.

8.3.14 Policies TR1 and TR2 prioritise walking, wheeling, cycling and public transport, supported by site-specific measures. E57 requires pedestrian and cycle infrastructure and bus routing through the site; E157 requires connections to the Spen Valley Greenway, Low Moor railway station and the bus network; and MDS2 requires active-travel and public-transport integration. These measures should improve access for people without a car. However, some uncertainty remains because the strategic sites are located at the urban edge and some industrial and logistics uses may operate outside conventional hours. The Plan does not specify public transport frequencies or operating hours aligned with shift patterns, meaning that some employees may remain dependent on private vehicles. [

8.3.15 Consequently, whilst significant positive effects are anticipated overall, a degree of uncertainty remains regarding the distribution of benefits (from both housing and employment) and impacts across different groups.

Other policies

8.3.16 The wider Bradford Local Plan policies are anticipated to contribute positively towards the communities, population and housing IA theme. This is due to the focus of policy provisions on delivering housing to meet the identified need of Bradford's growing and diverse population. This includes supporting community-led housing and self and custom build housing (Policies HO1 and HO5), a suitable mix of housing in terms of type, size and tenure (Policy HO3), affordable housing (Policy HO4), specialist and supported accommodation (Policy H06), and accommodation for gypsy and traveller communities (Policy HO7).

8.3.17 Policy HO3 is particularly relevant to equalities, as it seeks to support mixed and inclusive communities and requires housing mix to have regard to identified needs, including family-sized housing, affordable housing and level-access accommodation.

8.3.18 The policy also recognises the need for larger family-sized housing to address identified needs amongst Black and Global Majority households and multi-generational households.

8.3.19 Positive effects are also likely through ensuring infrastructure is delivered alongside new housing growth to support new development and encourage sustainable communities (Policy HO1), as well as design requirements for accessible and adaptable homes and appropriate internal space standards (Policy HO8). These policy requirements are likely to contribute to a range of communities by supporting the delivery of a more diverse housing stock that responds to the needs of different household types and demographics, including families, older people, people with disabilities and other people with specialist housing needs, as well as Gypsy and Traveller communities, and Black and Global Majority Groups.

8.3.20 The Bradford Local Plan policies also seek to support communities, populations and housing through provisions that seek to maintain and enhance community infrastructure across the district (Policy SC1), including educational infrastructure (Policy SC3) and healthcare infrastructure (Policies SC4 and SC5). Policy HO1 also seeks to ensure that infrastructure is delivered alongside housing growth, including investment in transport, health and education infrastructure. These provisions are likely to bring forward positive effects by retaining and enhancing the accessibility of community services and facilities, supporting community interaction and social inclusion, improving access to education and healthcare, and helping to reduce inequalities in access to essential services and opportunities.

8.3.21 The provision of appropriate infrastructure alongside housing growth is also anticipated to support the creation of sustainable communities and help ensure that population growth does not place undue pressure on existing community facilities. In this regard, the Local Plan also includes Policies ID1 and ID2 that seek to ensure new development includes delivery of new/enhanced infrastructure to support additional demands, in line with the Local Infrastructure Plan (which sets out what infrastructure is required, when and where, to ensure sustainable development).

8.3.22 Additionally, it is considered that policies focused on design will also have mostly positive effects in relation to communities, population and housing. This is through provisions that seek to create safe, accessible, inclusive and welcoming spaces for the whole community (Policies DS2 and DS4) and encouraging community interaction through the design of development, streets and public spaces (Policies DS2 and DS4). The wider design approach, including requirements for accessible and adaptable homes, appropriate amenity space and inclusive public spaces, is likely to support independent living, social interaction and the ability of people of different ages and abilities to participate in community life. Collectively, these policies are anticipated to support inclusive and sustainable communities and contribute towards addressing inequalities in access to suitable housing, infrastructure and community facilities across Bradford.

Overall effects (housing)

8.3.23 It is considered that the plan is likely to lead to **major positive effects** with regards to housing as the growth strategy allocates homes to meet the identified housing need figure for the plan period.

8.3.24 This includes the delivery of affordable housing, as well as other types of housing which meet the specific needs of the district's population. This is further strengthened by the policy framework which seeks to ensure future development is accessible and well-integrated, contributing to a high quality of life. A proportion of growth is identified on non-specific sites within broad locations, which brings an element of uncertainty with regards to whether full housing needs will be met over the plan period. This brings a degree of uncertainty to the prediction, but this is tempered by the plans proactive approach to regeneration, application of a flexibility buffer and inclusion of a diverse portfolio of sites of different sizes and locations.

Overall effects (equalities)

8.3.25 The plan is likely to contribute to **major positive effects** with regards to addressing inequalities. Through the delivery of a wide range and amount of housing across the district, the Plan will assist in increasing access to housing for all members of the community, including those with protected characteristics. The Plan also provides sufficient employment land and actively seeks to improve accessibility to services and facilities, employment opportunities, educational facilities, and public transport networks. Alongside socio-economic benefits, there is a focus on improving the built and natural environment, which has knock on benefits for groups that rely upon well designed neighbourhoods and streets. A significant focus on regeneration in Bradford City itself will also ensure that some of the most disadvantaged members of the district's population can benefit from growth. Whilst the Plan clearly intends to bring about positive outcomes for communities, and ensure that inequalities are reduced, there is a need to acknowledge the potential for some **minor negative effects** associated with displacement, disproportionate construction impacts in areas of high growth, and potential for temporary pressures on infrastructure. It is also worth noting that no sites are identified to meet identified needs for Gypsy and Traveller pitches. Whilst there is an appropriate criteria-based policy in place, this leaves a degree of uncertainty.

Table 8.1: Summary effects for groups with protected characteristics

Protected Characteristics	Summary of impacts
Age	The Plan recognises the differing housing and infrastructure needs of children, young people and older people. This includes provision for family-sized homes, specialist and supported accommodation for older people and people with complex care needs, and accessible community, education, healthcare, leisure and recreational facilities. The provision and protection of play areas, open spaces and green infrastructure also provides opportunities for children and young people to participate in recreation and physical activity. The focus on creating safe, inclusive and accessible neighbourhoods is also relevant across different age groups. However, some groups may experience temporary disruption during construction, or pressure on existing services and facilities where infrastructure does not come forward alongside population growth.

Protected Characteristics	Summary of impacts
Sex	Men and women are likely to benefit from the Plan through improved access to housing, employment, services, healthcare, public transport, walking and cycling, and safer and more inclusive public spaces. The emphasis on safe and accessible public spaces is particularly relevant to women and girls. As women are at greater risk of discrimination and harassment when making journeys, the public realm and active travel improvements may provide benefits through improved perceptions of safety. There remains some uncertainty regarding whether the benefits of employment and regeneration will be experienced equally by men and women, as the Plan does not contain extensive sex-specific employment measures.
Sexual orientation	The Plan promotes safe, inclusive and welcoming places and supports access to community facilities, services and public spaces. Improved public realm, open spaces, community facilities and access to services can support social inclusion and community cohesion. However, the Plan does not appear to contain specific provisions directed towards LGBTQ+ communities or the protection of LGBTQ+ venues. Consequently, the potential benefits are principally through the Plan's wider approach to inclusive design and community infrastructure, rather than targeted measures.
Gender reassignment	The Plan promotes safe, accessible and inclusive places and supports access to community facilities, healthcare, services and public spaces. These provisions can support participation in community life and access to essential services. However, as with sexual orientation, the Plan does not contain specific provisions relating to trans or non-binary people, meaning that benefits are likely to arise primarily through the application of inclusive design and service-access policies rather than targeted measures.
Disability	The Plan is likely to have positive impacts for disabled people through its approach to accessible and adaptable housing, accessible healthcare, transport, public spaces and community facilities. The Plan requires new homes to meet national space standards, with 5% meeting M4(3) wheelchair-user standards and 95% meeting M4(2) accessible and adaptable standards. The housing mix also includes a need for level-access accommodation. The Plan also seeks to ensure that healthcare, education, community facilities, public spaces, open spaces and transport infrastructure are accessible to all. This is supported by requirements for inclusive design, accessible routes and facilities, and safe and convenient environments. Potential negative effects include temporary construction disruption and the risk that existing accessible facilities or routes could be affected during redevelopment, although the Plan's design and infrastructure requirements provide some mitigation.

Protected Characteristics	Summary of impacts
Marriage and civil partnership	The Plan supports the provision of a range of housing types, sizes and tenures to meet the needs of different households and communities. The provision of family-sized housing, affordable housing and a range of housing choices is relevant to households at different stages of life, including married couples and civil partners. The benefits are not expected to be limited to married couples, with the wider housing and community policies supporting a range of household types and living arrangements.
Pregnancy and maternity	The Plan's approach to accessible housing, healthcare, community infrastructure, active travel and safe public spaces should benefit pregnant people and those with young children. The Plan requires healthcare facilities to be fully accessible to all sections of the community and supports safe, accessible and inclusive public spaces, play and recreation. The provision of family-sized housing and level-access accommodation is also relevant. Potential negative effects include temporary disruption during construction and pressure on healthcare, childcare or other community infrastructure if delivery does not keep pace with population growth.
Race	The Plan recognises the ethnically diverse population of Bradford and seeks to ensure that housing and infrastructure provision responds to different community needs. This includes consideration of larger family-sized housing for Black and Global Majority households, while the Plan's approach to tackling overcrowding and providing a range of housing types and tenures may address identified inequalities. The Plan does not make specific provision for Gypsy and Traveller communities but includes a criteria-based policy. This creates some uncertainties about whether this groups needs will be met.

Protected Characteristics	Summary of impacts
	People from some ethnic minority communities are also disproportionately represented in areas experiencing higher levels of deprivation and are more likely to experience lower household incomes, housing affordability challenges and poorer health outcomes. As such, the Plan's focus on the delivery of affordable housing, regeneration, economic growth and improved access to services has the potential to help address some of these underlying inequalities. In particular, Policy EC3 seeks to secure contributions from new development to support local employment opportunities, training and apprenticeships, providing opportunities for residents to develop skills and access employment. The focus of regeneration and growth in areas experiencing higher levels of deprivation, particularly in Bradford, Shipley and Keighley, provides opportunities for investment and improved access to housing, jobs, services and infrastructure. There is nevertheless a risk that the scale of regeneration could result in temporary disruption or displacement of existing communities if not carefully managed.
Religion and belief	The Plan supports the retention and enhancement of community infrastructure and the creation of safe, inclusive and welcoming places where communities can interact. The provision of accessible community facilities and services, together with the Plan's recognition of local character and community identity, is relevant to Bradford's diverse religious and faith communities. However, there are no clear Plan provisions specifically directed towards places of worship or particular religious groups, so the potential benefits are primarily through the wider approach to community infrastructure and inclusive place-making.
Socio-economic status	Although not a protected characteristic under the Equality Act 2010, socio-economic circumstances are an important consideration given the inequalities identified across the District. The Plan seeks to improve access to affordable housing, employment, education, training, healthcare, community facilities and transport. The distribution of growth and regeneration investment, including within Bradford City Centre, Shipley, Keighley and Holme Wood and areas experiencing higher levels of deprivation, provides opportunities to improve access to housing, services and economic opportunities. Potential negative effects include temporary disruption from construction, pressure on existing infrastructure and the risk of displacement where regeneration increases development pressure or housing costs.

Protected Characteristics	Summary of impacts
Care leavers	Access to suitable, affordable and secure housing is particularly important for care leavers transitioning to independent living. The Plan's provision for affordable, accessible and adaptable housing, alongside specialist/supported accommodation and access to education, employment, healthcare, community facilities and sustainable transport, can help support independence and reduce the risk of housing insecurity. The provision of safe, inclusive and well-connected neighbourhoods, with access to green space and recreation, is also relevant to wellbeing and social inclusion.

8.4 Health and wellbeing

IA Objectives

- **3a** 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.
- **3b** To create good cultural, leisure and recreation activities available to all.
- **3c** To improve safety and security for people and property.

Growth strategy and allocations

8.4.1 The growth strategy performs well by seeking to deliver 33,669 homes over the 18-year plan period, alongside 13,842 affordable homes. The strategy is also supported by the designation and protection of 1,693 open spaces, covering almost 2,800ha of land, which will help to retain existing spaces for recreation, physical activity and access to green space. The provision of new housing alongside the protection of existing and creation of new open space through development is therefore likely to support healthy communities. It is worth noting that the majority of sites allocated within the urban area and at settlement edges will not result in the loss of formal / public open spaces (one site is a former Golf Course, but this is a private facility).

8.4.2 The distribution of growth is also relevant to health and wellbeing. Policy SS1 directs growth towards existing sustainable urban areas and settlements with good access to services and facilities, with Bradford and Shipley identified as the prime focus for housing, employment, leisure, education, health and cultural facilities. Growth in these locations provides opportunities for residents to access services and facilities that support physical and mental wellbeing, as well as employment, recreation and green space. The focus on accessible and well-connected places may also encourage active lifestyles and help reduce inequalities arising from poorer access to services and facilities.

8.4.3 The growth strategy focus on regeneration is particularly relevant to health inequalities. Policy SS1 directs growth and regeneration towards Bradford and Shipley, followed by towns including those with greater need for urban renewal such as Keighley, while also supporting the renewal of existing housing estates through physical and infrastructure improvements.

8.4.4 Investment in these areas provides opportunities to improve housing and environmental quality and access to services, facilities and green infrastructure, with potential benefits for communities experiencing existing social and economic challenges. However, the extent to which these benefits are realised will depend on regeneration and supporting infrastructure being delivered alongside new development.

8.4.5 The scale of growth may also place additional pressure on existing healthcare, community and recreational infrastructure. This is particularly relevant where population growth is concentrated, although the Plan's approach to infrastructure delivery and Policy SC4's support for new or enhanced healthcare facilities where there is an identified need provide mechanisms for responding to additional demand. Similarly, the protection and enhancement of open space through Policy NE2 will help maintain opportunities for physical activity, recreation, social interaction and access to nature.

8.4.6 There is also potential for localised adverse effects where allocations are exposed to existing poor air quality. This is discussed in more detail under the **climate and resources** IA theme.

8.4.7 Development in areas affected by existing poor air quality has the potential to increase exposure to pollutants for existing and new residents where additional emissions arise from development or associated activity. The site-specific policies recognise this relationship and require development to accord with the safeguarding measures in Policy CR1. In relation to the above, the policy for site H788 recognises is adjacent to an AQMA and therefore development must be in accordance with the requirements set out in Policy CR1 of the plan.

8.4.8 With regards to employment land, site E157 - Nufarm South is relevant to health and safety related objectives. The allocation falls within consultation zones associated with the adjacent COMAH-regulated Nufarm facility. The site-specific policy recognises these constraints through requirements for HSE consultation, hazard-zone risk assessment and controls on occupancy within parts of the site. However, development would increase the number of people working within the consultation zone and could increase exposure to residual major accident hazards. Nevertheless, the allocation is proposed for employment uses adjacent to an established industrial use and is anticipated to be capable of delivery subject to appropriate mitigation and compliance with relevant health and safety requirements.

8.4.9 Turning attention towards other health related impacts associated with employment land, site E157 is also close to existing residential communities, so development could result in adverse amenity effects associated with increased traffic, HGV movements, noise, lighting and industrial activity.

8.4.10 The two other large strategic sites proposed for allocation at E57 and Esholt are in locations that are more detached from existing employment areas. Effects in relation to amenity are therefore expected to be more limited.

8.4.11 More generally, the wider portfolio of employment sites has the potential for adverse effects on health through increased exposure to traffic, air pollution, noise, dust, light and industrial activity. These effects are most relevant where employment allocations are close to residential communities or would generate substantial HGV and employee movements. In response, Policies CR1, CR2 and ST4 require development to avoid unacceptable effects on air quality, human health and amenity, supported where necessary by technical assessment, separation distances, landscape buffers, screening and controls on construction and operational activities. Likewise, Policies TR1–TR5 further promote sustainable travel, freight management, HGV routing and lower-emission vehicles.

8.4.12 The strategic policies also provide an overarching framework for ensuring that growth contributes towards healthy and inclusive places. Policy ST4 seeks to create safe, accessible and sustainable places that support healthy and active lifestyles, including through green, blue and open space, play, environmental quality and access to health services. Policy ST4 also requires certain development proposals to include a Health Impact Assessment (HIA).

8.4.13 Policy ST3 also seeks to improve community resilience through climate change mitigation and adaptation. This is important given the potential impacts of climate change, such as increased flood events and droughts, can adversely impact both the physical and mental wellbeing of residents.

Other policies

8.4.14 The Bradford Local Plan policies also include provisions that are likely to contribute towards promoting good health and wellbeing and addressing health inequalities in the district. This is largely achieved through policies relating to health, community and education infrastructure.

8.4.15 For example, Policy SC4 supports proposals for new or enhanced healthcare facilities, including key facilities including Bradford Royal Infirmary and the Airedale Centre for Mental Health, while Policies SC1, SC3 and SC4 seek to ensure that community, education and healthcare facilities are accessible by walking, cycling and public transport. Policy SC3 also supports new and enhanced educational facilities that are accessible and meet the identified needs of the population, including SEND provision. Policy SC1 seek to bring forward new or enhancements to existing community facilities and infrastructure, including facilities that have flexibility of use and provide opportunities for community interaction. Policy SC8 also requires Health Impact Assessments for relevant development proposals, providing an opportunity for potential impacts on health and health inequalities to be identified and addressed through the planning process. Collectively, these policies are likely to support healthier and more inclusive communities by improving access to essential services and facilities, supporting interaction and physical activity, and helping to address inequalities in access to health, education and community infrastructure.

8.4.16 The housing policies are also likely to contribute towards health and wellbeing and addressing inequalities across Bradford. This is anticipated to be achieved through delivering well-designed specialist and supported accommodation to meet the needs of vulnerable people and those with disabilities and long-term health problems, including (but not limited to) older people and those with mental health needs (Policy HO6). Policy HO6 also seeks to ensure that housing development has good access to healthcare, community and transport infrastructure, and promotes independent living and social inclusion. Furthermore, Policies HO8 and HO9 include requirements for housing development to be accessible and adaptable and provide a healthy living environment, including through appropriate internal living space and residential design standards.

8.4.17 There is also a focus on addressing housing affordability pressures through the provision of affordable and social housing (Policy HO4), which is likely to contribute towards reducing health inequalities associated with access to suitable and affordable housing, particularly for low-income households.

8.4.18 The Plan's approach to open space, sport and recreation is also likely to make an important contribution to physical and mental health and wellbeing. Policy NE2 seeks to protect existing open space, sports and recreational land and buildings, while supporting proposals that improve their accessibility, quality, function and connectivity. The policy also requires new residential development to provide appropriate amenity greenspace and play space, and requires new open space to be safe, publicly accessible, usable and of high quality. New play provision is required to be appropriately located, safe, inclusive and accessible, while providing opportunities for play, social interaction and informal recreation. These provisions are likely to support physical activity, recreation, social interaction and access to nature, with the potential to contribute to both physical and mental wellbeing and help reduce health inequalities.

8.4.19 The wider green and blue infrastructure and transport policies are also likely to support healthier lifestyles. Policies NE1, DS2 and NE2 support the provision, protection and enhancement of green and blue infrastructure and open space, providing opportunities for recreation, physical activity and access to nature. Policies TR4 and DS4 seek to improve walking and cycling infrastructure and create safe, attractive and connected routes, including connections to schools, retail and leisure facilities. Policy TR2 also supports access to key infrastructure through sustainable transport options, ensuring infrastructure can be accessed by all community members. Together, these policies are likely to encourage active lifestyles, improve access to recreational and community facilities and reduce barriers to participation in physical activity, while also supporting social inclusion.

8.4.20 The Plan also contains provisions that are likely to contribute towards safety and security and the creation of healthy places. Policy NE2 requires new and improved open space to be safe, accessible and usable, while Policy DS2 includes provisions relating to the design of development and public spaces. Policies TR4 and DS4 also seek to create safe and attractive walking and cycling routes and well-designed streets and public spaces. These policy measures are likely to contribute towards creating environments in which people feel safe and are able to use public spaces, active travel routes and recreational facilities.

8.4.21 Finally, Policy TC4 is likely to have a positive effect on health by restricting hot food takeaways near schools, to help reduce easy access to poorer quality and unhealthy foods for children and younger people.

Overall effects

8.4.22 The plan is considered likely to lead to **major positive effects** for health and wellbeing by supporting measures which contribute to improved physical and mental health and wellbeing, such as housing (including affordable housing), cultural, leisure and recreational facilities; and safe and accessible spaces.

8.4.23 The strategy focuses growth within existing urban areas and regeneration locations, supporting access to jobs, services, public transport, open space and community facilities. The Plan also promotes active travel, high-quality design, green and blue infrastructure and healthier neighbourhoods, all of which are likely to contribute positively towards physical and mental wellbeing. Furthermore, the regeneration of previously developed land and underperforming urban areas presents opportunities to improve environmental quality and reduce health inequalities in parts of the District.

8.4.24 However, some adverse effects are also likely. Development may place additional pressure on healthcare, education and community facilities, particularly where infrastructure delivery does not keep pace with growth. Growth on the edge of settlements may also lead to concerns regarding the loss of greenfield land, construction impacts, changes to local character and reductions in the perceived quality of the living environment for some communities (consultation feedback from Reg18 stages suggests that these are issues for a range of communities). Overall, whilst some localised **minor negative effects** are anticipated, the Plan is expected to support healthier communities and improve wellbeing outcomes across much of the District.

8.5 Economy

IA Objective

- **4a)** Increase the number of additional jobs delivered, particularly for high-skilled/paid employment opportunities.
- **4b)** Ensure that job opportunities are suited to the needs of the local workforce across all age groups, as well as providing new opportunities for training and education
- **4c)** To deliver economic growth through attracting significant investment to provide new/enhance employment floor space, new development within regeneration areas and town centres, as well as through the expansion of existing businesses.

Growth strategy and allocations

8.5.1 The growth strategy performs well by planning to meet the identified requirement for at least 110.5ha of employment land / almost 29,000 jobs over the 18-year plan period. This reflects the need identified through the Employment Land Review Addendum and the Council's ambition to support economic growth, improve productivity and address identified constraints in the supply and quality of employment space.

8.5.2 This is likely to support the continued growth of Bradford's economy, especially through the provision of land for key and emerging growth sectors, while also helping to address the relatively low economic activity rate in Bradford (52.5%) compared to the national average (57.4%). The scale of employment growth therefore provides opportunities to increase participation in the labour market and support local economic growth.

8.5.3 The spatial distribution is also relevant in terms of access to employment opportunities. While 26 sites are over 5km from the nearest employment zone, almost all sites are within walking distance to a bus stop, which will likely provide connections by sustainable modes to these employment zones.

8.5.4 It is also worth noting that the vast majority of development falls within very accessible locations with regards to employment access.

8.5.5 Policy SS1 directs housing, economic growth and regeneration towards the Broad Locations of Growth identified as Regeneration Areas of Bradford City Centre, Keighley, Shipley and Holme Wood. It also supports Bradford as a globally connected hub for economic innovation, skills and learning, digital connectivity and enterprise, while seeking to build on the economic strengths of the principal towns and support economic diversification in villages and rural areas. This spatial approach provides opportunities to support regeneration and investment across the district, with a focus on the larger urban areas including those such as Bradford with existing economic and social challenges.

8.5.6 Given the relatively high levels of deprivation and economic inactivity experienced in parts of the District, the scale and distribution of proposed employment growth has the potential to improve access to jobs and support more inclusive economic growth. This should also help to diversity the economy and create high-skilled, knowledge-based jobs.

8.5.7 Policy SS2 identifies employment site allocations and strategic employment sites (MDS2, E57 and E157). This includes 27.6ha of employment land removed from the Green Belt and allocated for employment uses. The policy also supports office and storage and distribution uses within identified Employment Zones, established employment areas and Regeneration Areas. This provides flexibility to respond to changing employment needs and supports the continued availability and diversification of employment land across the district.

8.5.8 The allocation of strategic employment land at E57 East of Holme Wood, E157 Nufarm South and MDS2 Esholt Former Water Treatment Works provide notable benefits through the provision of employment opportunities at three of the District's most significant employment locations.

8.5.9 Nufarm South would extend and strengthen the established employment corridor in Bradford South East, helping to provide jobs within reach of nearby communities, including areas experiencing relatively high levels of deprivation. There would also be links between areas to the south east of Bradford, the city centre and wider areas within West Yorkshire such as Leeds.

8.5.10 Esholt would bring forward substantial employment development as part of a wider brownfield regeneration scheme in a sustainable and accessible location, with good connections to both Bradford and Leeds labour markets. Together, the allocations would support economic growth, attract investment and increase the availability of employment opportunities across a range of sectors, generating benefits for both existing and future residents over the long term.

8.5.11 Site E57 is adjacent to an established employment zone and a strategic housing regeneration opportunity at Holme Farm, as well as within proximity to enhanced planned transport infrastructure that will include new sustainable transport links to provide new connections with Bradford city Centre and wider areas outside of the District.

Other policies

8.5.12 The principal employment policy in the Bradford Local Plan is Policy EC1, which seeks to allocate and protect employment land to meet identified needs and support economic growth in Bradford across the Local Plan period. This includes identifying strategic employment growth at Esholt, Holme Wood and Nufarm, and provisions that are anticipated to ensure that allocated sites for employment support inward investment, enable existing businesses to grow, and retain and support new jobs. Policy EC2 further seeks to support the development, regeneration and protection of employment zones within the district, particularly within identified areas in the city of Bradford, Airedale and Wharfedale. Policy SC6 also includes provisions to encourage investment in digital infrastructure, which is likely to support economic growth and business capacity. Furthermore, Policy EC3 seeks to secure employment and skills benefits from major development proposals, with the aim of increasing wage levels and the proportion of residents in education or training. This is likely to support the development of local skills and qualifications, improve access to employment opportunities and help address local labour market challenges.

8.5.13 The wider Bradford Local Plan policies also contribute towards the economy. This is evidenced through establishing a hierarchy of centres, which seeks to direct economic growth towards the most sustainable and accessible locations (Policies TC1 and TC2). It is also demonstrated through a focus on growing key economic sectors, including the visitor economy and sustainable tourism, which is likely to support regeneration, investment and job creation, including through improvements to visitor attractions, accommodation and the built environment (Policy EC4). This is particularly relevant given the contribution of assets such as Saltaire World Heritage Site, Haworth and Brontë Country, Salts Mill, the National Science and Media Museum and Ilkley Moor to Bradford's visitor economy. Policies supporting the protection, enhancement and accessibility of cultural, heritage and tourism assets are likely to help sustain visitor expenditure and associated employment opportunities across the District.

8.5.14 Furthermore, policy requirements linked to the provision and enhancement of educational infrastructure are also likely to benefit the economy by increasing access to education and supporting improved attainment, qualifications and skills levels (Policy SC3).

8.5.15 Similarly, policies focused on transportation, including safeguarding strategic transport investments and integrating sustainable transport into new development, also have the potential to benefit the economy by improving access to employment and services (Policies TR1 and TR2). The safeguarding of land to support the delivery of mass transit across West Yorkshire also provides an opportunity to improve sustainable transport connections within the District and to wider economic centres, including Leeds. Improved connectivity could support regeneration, increase the attractiveness of Bradford city and the district for housing and employment development, and encourage investment that contributes to job creation and economic growth.

8.5.16 Collectively, these policy measures are likely to support economic growth and job creation by maintaining an adequate supply of employment land, supporting business investment and skills development, strengthening key economic sectors and improving accessibility to employment opportunities.

Overall effects

8.5.17 Overall, the Plan is predicted to result in **major positive effects** against this objective. The Plan provides sufficient employment land to meet identified needs, supports the creation of almost 29,000 jobs, directs growth towards regeneration areas and strategic employment locations, and includes measures to improve workforce skills and training opportunities.

8.5.18 The strategic employment allocations at Nufarm South and Esholt, alongside policies supporting business growth, town centres, tourism, education and digital infrastructure, are expected to support inward investment, increase access to employment opportunities and contribute to long-term economic growth across the District.

8.6 Natural environment

IA Objectives

- **5a) Biodiversity** - To conserve and enhance geodiversity and biodiversity, including; designated and locally important species and habitats; maintaining and strengthening ecological corridors and identifying, protecting and enhancing supporting habitats
- **6a) Landscape** - To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes

Growth strategy and allocations

8.6.1 A significant proportion of the supply and allocations identified within the Plan comprise previously development land (PDL). In this respect, the spatial strategy performs well by reducing pressure for development on undeveloped land and providing opportunities to incorporate biodiversity net gain, green and blue infrastructure and new landscape features within existing urban areas. However, PDL can also support biodiversity and provide important ecological functions, meaning that its redevelopment could result in the loss or fragmentation of existing habitats where these are present. An important factor to consider is the ability to deliver biodiversity net gain in urban environments where densities are higher and different solutions are required.

8.6.2 The strategy also involves the allocation of over 6000 homes on greenfield land, which has the potential to adversely affect biodiversity features (as discussed below). Conversely, while the development of greenfield land can result in the loss or alteration of existing habitats and landscape features, well-designed development at the urban fringe can also provide opportunities to strengthen ecological connectivity, create new habitats and integrate green and blue infrastructure with the wider landscape. The effects will therefore somewhat depend on the ecological and landscape characteristics of individual sites and the quality of their design and delivery.

8.6.3 The distribution of allocations brings some development into proximity with areas of biodiversity importance, including internationally and nationally designated sites, priority habitats, ancient woodland and the wider Wildlife Habitat Network. This is particularly relevant to the South Pennine Moors SPA/SAC, where development and associated population growth can give rise to recreational pressure and deterioration of air and noise quality.

8.6.4 In terms of designated sites for biodiversity, only three of the allocated sites are within 1km of a Special Area of Conservation (SAC) and Special Protection Area (SPA), specifically the South Pennine Moors. These sites, which are all located in Ilkley, are:

- Ben Rhydding Drive, Wheatley Grove (H383) (7.2ha) – 394m
- Coutances Way (H385) (7.4ha) – 850m
- Stockheld Road (H386) (0.2ha) – 960m

8.6.5 In response to the above, for these sites the plan specifies that development proposals must assess potential impacts on foraging habitat used by SPA qualifying species and provide ecological evidence where required, in accordance with the South Pennine Moors SPD and Policy NE3.

8.6.6 The HRA provides a wider assessment of this issue, identifying allocations within 2.5km of the South and North Pennine Moors SPAs and the potential for effects on functionally linked land supporting SPA species. However, the HRA concludes that Policy NE3, together with site-level ecological assessment and mitigation where required, provides an appropriate framework to avoid adverse effects on the integrity of the European sites.

8.6.7 Aside from these sites, there is further growth in the settlements that are within relatively close distance of the SPA (and could therefore give rise to cumulative pressures in terms of recreation). This includes sites within and on the edge of the urban area in settlements including as Ilkley, Burley in Wharfedale and Addingham. Growth in Keighley (including at allocated sites and regeneration areas) could also contribute towards cumulative pressures. The HRA also identifies recreational pressure as a potential pathway for effects on the South and North Pennine Moors. Policy NE3 provides a strategic mitigation framework for development within 7km of the designated sites, including measures to manage recreational pressure. The HRA concludes that following appropriate assessment and taking into account mitigation measures incorporated into the Plan, it can be concluded that the Plan has no adverse effect on the integrity of any European site, alone or in-combination.

8.6.8 The following sites are within 1km of a Site of Special Scientific Interest (SSSI), mostly overlapping with the South Pennine Moors SPA (with the implications discussed above):

- Ben Rhydding Drive, Wheatley Grove (H383) (7.2ha) – 394m from the South Pennine Moors
- West Lane (H28) (0.8ha) – 590m from Trench Meadows
- Coutances Way (H385) (7.4ha) – 850m from the South Pennine Moors
- Stockheld Road (H386) (0.2ha) – 960m from the South Pennine Moors

8.6.9 None of the sites are within 1km of a National Nature Reserve (NNR).

8.6.10 The following sites are within 100m of ancient woodland:

- Bingley Road / Long Lane, Heaton (H780) (20ha) – adjacent to Royds Cliff Wood
- Fenwick Drive, Woodside (H1252) (7.8ha) – adjacent to Old Hanna / Low Woods
- Hainworth Wood Road, Keighley (H551) (3.2ha) – 4m from Hainworth Wood
- Roundwood Avenue, Ravenscliffe (H585) (3.9ha) – 39m from Round / Bill Woods
- Haworth Road, Sandy Lane (H694) (7.6ha) – 48m from Chellow Dean
- Hainworth Lane / Halifax Road, Keighley (H547) (1ha) – 52m from Hainworth Wood
- Bingley Road, Nabwood (H1059) (5.3ha) – 70m from Nab Wood
- North Parade, Allerton (H773) (1.4ha) – 80m from Chellow Dean
- Land east of Harrogate Road, Greengates (H636) (1ha) – 88m from Calverley / Lodge Woods
- H924 is adjacent to Ancient woodland.
- H604 is a variable site that is almost adjacent to ancient woodland.

8.6.11 In response to the above, for some of these sites the plan outlines specific measures which seek to protect ancient woodland. For example, the plan recognises that site H780 adjoins an area of ancient woodland and that the 25m buffer zone falls into a small part of the site. As such, the plan advises development is informed by an arboriculture assessment.

8.6.12 In addition, regarding site H1252 the plan notes that the western edge of the site is within the 25m buffer zone of an area of ancient woodland. The plan states that development will need to demonstrate that the integrity of the woodland is protected, and further planting of native species will be required.

8.6.13 The following sites overlap (>25%) with priority habitat:

- Hainworth Road, Keighley (H550) (0.2ha) – 100% overlap with deciduous woodland
- Woodhouse Road, Keighley (H554) (0.8ha) – 99% overlap with deciduous woodland
- Roundwood Avenue, Ravenscliffe (H585) (3.9ha) – 62% overlap with additional habitats (no main habitat)
- Cleckheaton Road (H994) (0.5ha) – 33% overlap with deciduous woodland

- H1558 Friars Industrial Estate contains deciduous woodland priority habitat.
- Former Esholt Works Employment Site MDS2 is overlapped by areas of priority habitat.

8.6.14 Regarding the site-specific policies, most of these set out mitigation measures. For example, under site H550 the plan sets out that an ecological survey will be required as part of any planning application to determine any impacts. Moreover, under site H554 the plan recognises that the site contains a number of mature trees and that the design and layout of any development should retain these trees in line with Policy NE6. The policy for MDS2 and sets out a need to retain and enhance priority habitats and ecological networks.

8.6.15 Nevertheless, it is likely that multiple developments will result in a disruption and / or loss of priority habitat, which is a negative impact. Though site-level ecological assessments are required, the residual effect remains uncertain in some instances until it can be demonstrated that Priority Habitats can be retained and protected through design-led mitigation.

8.6.16 In terms of locally designated sites for biodiversity, a range of sites are within 100m of an LWS. Many of the site-specific policies recognise this and provide mitigation measures accordingly, such as the contribution of landscaping / new tree planting; the provision of wildlife corridors; and ecological surveys. This should ensure that site level and cumulative impacts are managed.

8.6.17 The following sites contain more than two Tree Preservation Order (TPO):

- West of Green Lane (H1136) (1.3ha) – contains 37 TPOs
- Woodside Road (H1089) (5.6ha) – contains seven TPOs
- Airedale House, Skipton Road (H522) (1.1ha) – contains six TPOs

8.6.18 Similarly, many of the site-specific policies recognise this and provide mitigation measures. For example, under site H1136 the plan outlines that the design and layout of any development should seek, where possible, to retain and protect TPOs on site. In addition, an arboricultural assessment will be required.

8.6.19 Turning attention to employment growth, Several allocations are affected by ecological constraints, including Wildlife Habitat Networks, bat alert areas, mature trees, hedgerows, grassland and green and blue infrastructure corridors. Of the strategic sites, E57 is associated with habitat networks and bat activity, while MDS2 includes previously developed land that may nevertheless support priority habitats and established ecological interest. Employment development could result in habitat loss, fragmentation, disturbance, lighting effects and increased pressure on ecological corridors. In response, the Local Plan requires ecological assessment, application of the mitigation hierarchy, measurable biodiversity net gain and the retention and enhancement of important habitats. Development should also contribute to Local Nature Recovery Strategy measures and strengthen ecological connectivity through woodland, grassland, wetland and riparian habitat creation. The policy preference for on-site biodiversity net gain should help

ensure that enhancement is related to the communities and ecological networks affected by development.

8.6.20 Potential positive effects may arise where previously developed or intensively managed sites are restored and incorporated into a coherent green infrastructure network. However, biodiversity net gain will not necessarily compensate for all effects on established or irreplaceable habitats, and the ecological value of brownfield sites should not be underestimated.

8.6.21 More generally, focusing on the strategic policies, policy SS1 seeks to protect and enhance the district's environmental resources including areas of international and national importance, such as the South Pennine Moors. It also seeks to ensure that developments protect and enhance local settings and heritage, and reinforce or create a sense of local character, community and distinctiveness.

8.6.22 In addition, policy ST3 outlines that development proposals will be expected to protect biodiversity by facilitating the management, restoration, enhancement and expansion of vulnerable habitat types. This is in addition to consulting the Local Nature Recovery Strategy to identify where and how to create and enhance habitats to help wildlife.

8.6.23 Adding to the above, policy ST6 sets out the Council's plan to protect, maintain, enhance and restore a connected, multi-functional strategic green and blue infrastructure (GBI) network across the district. This includes (but is not limited to) the South Pennine Moors. The policy also states that development proposals which fall within the strategic GBI network must avoid harm to the integrity, connectivity, and functionality of the network. This includes by supporting the delivery of the Nature Recovery Network and Local Nature Recovery Strategy. Particular protection will be afforded to strategic ecological corridors and habitat networks.

8.6.24 In relation to landscape, the allocation of greenfield and Green Belt land would alter landscape character, with potential to have adverse effects, particularly where development is located in areas of higher landscape sensitivity and visibility (with multiple sites falling into this category for both the housing and employment sites). The relevant site allocation policies seek to address this by including requirements for development to respond to local landscape character, retain important landscape features, provide appropriate buffers and minimise visual effects.

8.6.25 The Landscape Character Assessment SPD highlights that parts of the district are sensitive to development due to their contribution to settlement identity, rural character, tranquillity, dark skies and important views.

8.6.26 It also identifies pressures associated with development on settlement edges, particularly within moorland fringe, valley-side and upland landscapes, where there is potential for development to erode settlement separation, alter the relationship between settlements and landform, and affect locally distinctive landscape characteristics. Whilst the site-specific policies seek to address these issues through design and mitigation measures, landscape change is likely to occur in some locations where

development extends into currently undeveloped land (several of which are categorised as being moderate to high in sensitivity).

8.6.27 The Plan's focus on directing the majority of growth towards the main urban areas and regeneration locations helps to reduce development pressure on some of the district's most sensitive landscapes and reflects the overall landscape-led approach promoted by the SPD. Nonetheless, negative effects at a site level and cumulatively are likely to be unavoidable given the loss of greenfield land involved.

8.6.28 Focusing on the potential impact of development on landscape character, the following sites are within 1km of a National Landscape:

- Coutances Way (H385) (7.4ha) – 215m from Nidderdale
- Church Street / Main Street (H26) (0.2ha) – 292m from Nidderdale

8.6.29 In relation to the above, the policy for site H385 sets out that development should be located along the western edge of the site, contiguous with existing residential development north of the site. Any proposal should also provide sufficient and appropriate landscape buffer to any new development, which would screen and integrate modern development into the wider landscape, and soften the existing abrupt settlement edge. Notably, development should be minimised in views from the Nidderdale National Landscape, as well as retain in-field trees and repair drystone walls.

8.6.30 None of the sites are within 1km of a National Park.

8.6.31 In terms of landscape sensitivity, out of the sites allocated, 21 have a ‘red’ colour coding (medium-high landscape sensitivity), whilst 71 have an ‘amber’ colour coding (low-medium to medium landscape sensitivity). In this respect, the growth strategy performs fairly well by minimising development in areas of medium-high landscape sensitivity. Nonetheless, a significant amount of development is proposed in sensitive locations, and thus significant negative effects are anticipated regardless of mitigation.

8.6.32 Whilst it is recognised that Green Belt is not a landscape designation, it is noted that 65% of the district (23,880ha) is covered by Green Belt. In relation to this, strategic policy ST5 highlights that proposals for development within the Green Belt will be considered inappropriate except where they meet the criteria and requirements set out in the NPPF and Local Plan policy NE9. The policy also supports the enhancement of Green Belt land and development of Grey Belt which meets the relevant criteria in the NPPF. Despite this policy, the strategy involves the release of land from Green Belt, which has some negative effects upon landscape function and character. However, significant strategic effects such as coalescence are not likely to arise.

Other policies

8.6.33 The Bradford Local Plan policies are anticipated to bring forward a range of effects in relation to the natural environment. This is due to the inclusion of policies that seek to deliver green and blue infrastructure that is well integrated into development design (Policies NE1, NE6 and DS2), and

provisions that seek to protect open spaces across the district (Policies NE2 and DS2).

8.6.34 This is also linked to policy provisions which protect the integrity of the South Pennine Moors SPA / SAC, which includes the need to ensure adverse effects are avoided or mitigated effectively (Policy NE3), and provisions which work to protect, enhance, restore and expand biodiversity and geodiversity features (including designated sites) across Bradford and achieve biodiversity net gain (Policies NE4, NE5 and NE6).

8.6.35 There is potential for the Plan's approach to green and blue infrastructure to provide wider benefits for biodiversity by strengthening connections between existing habitats and addressing gaps in the strategic network. Policy NE1 seeks to ensure that green and blue infrastructure is connected and integrated into development, including through wildlife habitats, tree planting and other measures, while supporting connections to the wider network.

8.6.36 Policy NE5 requires eligible development to achieve at least 10% biodiversity net gain and promotes the delivery of additional gains where these can contribute to local biodiversity priorities, ecological network enhancement and the objectives of the Local Nature Recovery Strategy. The policy also promotes a mitigation hierarchy and requires biodiversity enhancements and net gain provision to be appropriately secured and managed over the longer term.

8.6.37 Provisions such as these are likely to contribute towards the conservation and enhancement of biodiversity and geodiversity across Bradford by helping to protect and enhance connectivity between designated and other ecologically important sites, safeguard and contribute towards the quality of designated sites, and helping to achieve biodiversity net gain. The emphasis on directing biodiversity net gain towards locations which support ecological networks and Local Nature Recovery Strategy priorities also provides potential for individual development proposals to contribute towards wider nature recovery rather than delivering isolated areas of habitat enhancement. They are also anticipated to contribute to landscape quality by safeguarding and enhancing important features that contribute to landscape character and quality in Bradford.

8.6.38 The natural environment is further considered through Policy NE7, which seeks to ensure development proposals contribute positively towards the conservation, management and enhancement of the diverse landscapes across Bradford, in order to safeguard and improve landscape character and quality. This includes ensuring that the Landscape Character Assessment SPD guides the design of development proposals to ensure growth reflects local character, quality and sensitivity, and protecting the setting of the Yorkshire Dales National Park and the Nidderdale National Landscape. Policy NE8 also contributes in a similar way, by ensuring that development in the countryside reflects the character and sensitivity of the surrounding landscape.

8.6.39 Additionally, Policy NE9 also contributes to the natural environment by protecting the openness of the Green Belt – which is also anticipated to help

protect landscape character and contribute to protecting existing biodiversity and geodiversity assets and ecological networks.

8.6.40 The wider Bradford Local Plan policies are also anticipated to contribute towards the natural environment across the district. This is due to the inclusion of provisions that seek to ensure a strong sense of place and local landscape character and quality are reflected in development design (Policy DS3). Furthermore, the policies also include provisions that ensure the importance of designated sites for biodiversity and geodiversity and landscape character and quality are fully considered through development proposals (Policies MIN7 and MIN9). There is also a focus on ensuring that biodiversity net gains are achieved and landscape character is maintained and enhanced through the restoration, aftercare and after-use of mineral extraction sites (Policies MIN8 and MIN9). Additionally, the focus on natural flood management, including measures such as restoring peatland and blanket bog, tree planting schemes, and restoring culverted watercourses, are also anticipated to positively contribute to the natural environment through habitat creation and enhancement of landscape character and quality (Policy CR4).

8.6.41 The Plan's approach to trees, woodland and hedgerows also provides an important contribution to biodiversity and landscape character, particularly through the protection of irreplaceable habitats such as ancient woodland and ancient and veteran trees under Policy NE6. The protection and enhancement of these features can support the preservation of landscape character, ecological connectivity and important habitat.

Overall effects (biodiversity)

8.6.42 The plan is considered likely to lead to **neutral effects** on biodiversity. It is recognised that the growth strategy includes sites in proximity to internationally, nationally and locally designated sites for biodiversity, and priority habitats. However, the site-specific policies within the plan recognise this and outline appropriate mitigation measures. In addition, the policy framework more broadly seeks to protect biodiversity sites; enhance the district's green and blue infrastructure network; and deliver BNG beyond the national requirement where possible. There is an assumption that biodiversity net gain will be delivered to improve the overall position at the district level, but it is also worth noting that there will be significant effects on individual sites from a direct loss of habitats. The HRA confirms that the mitigation secured through Policy NE3 and the wider Plan will be sufficient to prevent significant effects arising for European designated sites. The implementation of site-level ecological mitigation and strategic recreational mitigation will remain important over the Plan period. Given that the Plan relies on ecological surveys to fully identify and address impacts on sites, there is an element of uncertainty in the predictions at this stage.

Overall effects (landscape and townscape)

8.6.43 Potential / uncertain **moderate negative effects** are predicted under the landscape and townscape IA theme overall. Whilst it is recognised that the growth strategy delivers several sites in proximity (<1km) to Nidderdale National Landscape, only one of these is larger than 1ha. In addition, the

policy for the larger site seeks to address this constraint and sets out mitigation measures, including directing development to the least constrained part of the site in landscape terms. It is also important to note that more broadly, significant growth is directed away from the more sensitive rural locations.

8.6.44 Whilst site specific policies should help to reduce effects in particular locations, it is acknowledged that there is a substantial loss of greenfield land which is likely to lead to cumulative negative impacts upon landscape character across the district when considering employment and housing sites in combination.

8.6.45 Running in parallel to the negative effects, it is important to recognise the benefits that regeneration will have in terms of improving townscapes and reducing further pressure for growth in the more sensitive areas of the district.

8.6.46 More broadly, the policy framework has a strong focus on enhancing the district's green and blue infrastructure network and ensuring development is designed in a way which enhances the local landscape character. Therefore, **moderate positive effects** are predicted in addition to the negative effects.

8.7 Built environment

IA Objective

- **7a)** To sustain and, where appropriate, enhance the significance of heritage assets and their setting

Growth strategy and allocations

8.7.1 The growth strategy and allocations will inevitably result in changes to the character, appearance and setting of settlements and heritage assets. However, the Plan provides a strategic framework which seeks to manage these effects and, in some locations, use development and regeneration as an opportunity to conserve, enhance and bring heritage assets back into beneficial use.

8.7.2 The spatial strategy directs a significant proportion of growth towards existing urban areas, prioritising the reuse of previously developed land and buildings where these are not of high environmental value (Policy SS1). This approach supports the regeneration of underused sites and buildings, helping to improve the appearance, function and vitality of existing urban areas, such as parts of inner Bradford and Keighley. It also creates opportunities for the reuse of historic buildings and former industrial sites.

8.7.3 The Plan's emphasis on heritage-led regeneration, including the sensitive reuse of historic mills, together with the requirements of Policy HE1 to conserve, protect and enhance the historic environment, provides a framework for accommodating growth while retaining and reinforcing the characteristics that contribute to Bradford's distinctive character.

8.7.4 This approach is particularly relevant to the broad locations for growth at Bradford City Centre, Keighley, Shipley and Holme Wood, which contain concentrations of historic buildings, industrial heritage, conservation areas

and distinctive townscape. While the scale of growth proposed in these locations has the potential to negatively affect historic assets and their settings, it also presents opportunities to secure investment in the historic environment, support heritage-led regeneration, and enhance the quality and distinctiveness of existing places through well-designed development.

8.7.5 The distribution of allocations also brings development into proximity with a range of designated and non-designated heritage assets. The district contains the Saltaire World Heritage Site, numerous conservation areas, listed buildings, scheduled monuments, registered parks and gardens, the Registered Battlefield at Adwalton Moor and a wide range of locally important heritage assets and archaeological features. The district contains one of only two UNESCO World Heritage Sites (WHS) in Yorkshire, Saltaire. The following sites are within the Saltaire Buffer Zone, and therefore have a greater potential to negatively impact its setting and significance through their development:

- Cliffe Lane West (H57) (0.6ha)
- Wrose Brow Road, Windhill (H1055) (2ha)
- East Victoria Street (H1044) (0.4ha)
- Bingley Road, Nabwood (H1059) (5.3ha)
- Regent House (H1047) (0.7ha)
- Land between Leeds Road and Dock Lane (H1052) (0.7ha)
- West Lane (H28) (0.8ha) – adjacent.
- Shipley Hospital (H1030) (0.2ha)
- Old Mill House, Dockfield Road (H1037) (0.5ha)
- Carr Lane (H1011) (1.3ha)
- Queens Road / Ferncliffe Road, Saltaire (H1061) (0.9ha)
- Browfoot / Wrose Brow Road (H1056) (0.3ha) – 4m.

8.7.6 The potential effects on Saltaire are particularly important given its Outstanding Universal Value (OUV) and the sensitivity of its setting and key views. It is worth noting that none of these sites are actually within the WHS itself. Furthermore, the Plan provides a specific framework for managing these effects, including requirements for development within the World Heritage Site and its Buffer Zone to demonstrate how the OUV, setting and key views will be conserved (Policy HE1).

8.7.7 Site-specific policies also provide further requirements where relevant. For example, the policy for site H1061 requires the design, scale, materials, boundary treatment and landscaping to be in keeping with the WHS. In addition, development of this site should be informed by the local context and regard given to the WHS Management Plan. Another example is the policy for site 1011, which highlights the potential impact of development on important views with respect to the WHS. As such, it should not result in any impact on the outstanding universal value (OUV) or character and setting of the WHS. Furthermore, another example is the policy linked to site 1044, which recognises that the site is on a critical approach to the WHS and

indicates that the conversion of existing buildings on site is preferred to re-development of the site. As such, it is considered that the specific policy provisions work well to reduce adverse impacts upon the WHS at a site level and cumulatively.

8.7.8 The following sites are within 100m of a Scheduled Monument:

- Stockheld Road (H386) (0.2ha) – 34m from 'Old Bridge'.
- High Stead, Street Lane (H306) (0.8ha) – 82m from 'Cup, ring and groove marked rock at the base of a wall between East Morton and West Morton'.

8.7.9 In relation to the above, the site-specific policies include stipulations to help reduce negative effects. For example, the policy for site H386 highlights that an appropriate condition regarding pre-development below ground archaeological assessment / study is likely to be required. Notwithstanding this, it is recognised that the development of the site will need to be respectful of the setting of the Scheduled Monument. Another example is the policy for site H306, which states that the design and layout of any development should ensure that it takes into consideration the Scheduled Monument and its setting.

8.7.10 There are further sites that fall within 400m of Scheduled Monuments, but these will not affect the setting of assets (which are either already within an urbanised setting, or there would be significant open countryside between sites).

8.7.11 Only one site allocation is within 1km of a registered battlefield site, namely: Raikes Lane, east of Holmewood Estate (H911) (44.2ha) – 60m from 'Battle of Adwalton Moor 1643'. The policy for this site recognises this and requires an assessment to determine what contribution the development of the site will have on the elements which contribute to the significance of this heritage asset. If harm is noted, then mitigation will be required. It is considered unlikely that significant harm would arise given that there is already substantial screening and urban form between the site and registered battlefield.

8.7.12 The district contains 59 conservation areas. Out of the sites allocated through the plan, 43 are adjacent to a conservation area. The most affected conservation area in this respect is The Goitside, and the Leeds Liverpool Canal. The policies for affected sites recognise this and provide suitable mitigation measures.

8.7.13 The following site allocations are in close proximity (<100m) to a historic park and garden:

- Hollins Lane, Utley (H388) (4.1ha) – adjacent to Whinburn (Grade II).
- Lister Lane (H670) (0.2ha) – 3m from Peel Park (Grade II*).
- Exmouth Place (H598) (4.4ha) – 25m from Peel Park (Grade II*).
- Flockton Road (H932) (0.5ha) – 82m from Bowling Park (Grade II).

8.7.14 In relation to the above, the site-specific policies are considered to provide adequate mitigation. For example, the policy for site H388 recognises the site's proximity to the historic park and garden, and in response to the findings of the HIA suggests that development is likely only to be acceptable within the northern section of the site and on the provision of a landscaped buffer to protect the setting of Whinburn and its gardens.

8.7.15 The policy also notes that a more detailed HIA for the specific proposed scheme will need to be carried out at the planning application stage. In addition, there are site requirements identified for H670 which state that a HIA will be required and encourages early engagement with the Council.

8.7.16 The district contains 4,918 listed buildings, 12 of which are recorded on the heritage at risk register. The plan is considered to address this sufficiently, for example, the policy for H790 notes that Manningham Mills are included on the register. As such, proposals would need to incorporate mitigations such as appropriate distancing from existing structures and sympathetic design and layout. However, the policy does not set out enhancement measures for this heritage asset, and it is considered that this would strengthen the policy.

8.7.17 The following site allocations are in close proximity (<100m) to a Grade I listed building:

- Flockton Road (H931) (0.6ha) – 56m from Bolling Hall (Museum).
- Cathedral Quarter B (H233) (0.3ha) – 78m from Cathedral Church of St Peter.

8.7.18 Regarding the above, the policy for site H931 notes that the development of the site should ensure that the design of the development ensures no undue harm on Bolling Hall and provide appropriate mitigation.

8.7.19 The following site allocations are adjacent to a Grade II or II* listed building:

- Dole and Prospect Mills, Thornton Road (H1323) (1.2ha) – 285 and 287, Thornton Road BD13, Prospect Mill (Grade II).
- Drummond Trading Estate, Lumb Lane (H781) (3ha) – Main block of 3 storey warehouse, 5 storey Spinning Mill… (Grade II).
- Former Reservoir and Derelict Pumping Station, Carlisle Road (H782) (1.1ha) – 34, Bavaria Place BD8 (Grade II).
- Allerton Mills (H789) (1.2ha) – Two storey blocks to numbers 262 and 264 (Allerton Warehouse) (Grade II).
- Midlands Mills, Valley Road (H235) (1ha) – Ambler Mill and Midland Mills Warehouses.
- City Village Top of Town (H220) (2.6ha) – Fountain Hall, United Reform Chapel (Grade II).
- Spen View Lane / Shetcliffe Lane, Bierley (H879) (1.6ha) – Lockwood Farmhouse (Grade II).
- Wapping Road (H597) (0.5ha) – School House at Wapping Road School, Wapping Road School with attached steps and boundary walls (Grade II).

- Land off Buckingham Crescent, Clayton (H1270) Adjacent to 176-182, BRADFORD ROAD (Grade II)
- Albert Road, Brighouse and Denholme Road (H868) - Adjacent to Milepost opposite junction with New Part Road.

8.7.20 The site-specific policies for many of these sites recognise this proximity as a constraint and subsequently set out appropriate mitigation measures.

8.7.21 Regarding locally designated heritage assets, eleven sites are within close proximity (<100m) to a locally listed building. Notably, local heritage impacts are detailed in affected site-specific policies.

8.7.22 Turning attention towards employment growth, several sites have potential to affect designated and non-designated heritage assets through changes to their setting, context and associated views. Large industrial buildings and supporting infrastructure may give rise to effects extending beyond allocation boundaries due to their scale, massing, lighting and associated movement. E57 is sensitive due to the proximity of a Grade II listed building and the registered Battle of Adwalton Moor battlefield. The site policy limits development to generally small- and medium-sized commercial and industrial units of two to three storeys and requires substantial landscape integration, including tree belts, hedgerow restoration and woodland planting. These measures should help reduce visual effects, although development could still affect the setting and appreciation of nearby heritage assets and the wider landscape.

8.7.23 MDS2 at Esholt is also sensitive due to the historic development of the former sewage works and its relationship with the Leeds and Liverpool Canal Conservation Area. The wider works contain historic buildings and structures associated with the early twentieth-century sewage works, including buildings grouped around the historic canal basin and associated canal infrastructure. The allocation requires development to respond to the existing footprint, building heights, massing, activity, landscape setting and woodland structure. However, it does not include a specific heritage requirement, and there is potential for new employment buildings, access infrastructure and lighting to affect the character and setting of the historic works, canal-side assets and any listed or non-designated buildings within or adjoining the development area. A site-wide Heritage Impact Assessment should therefore identify the significance and setting of affected assets, define important views and relationships, and inform the retention, reuse, scale, layout and phasing of development.

8.7.24 A number of smaller employment allocations also comprise former industrial sites or are located close to historic mills, conservation areas and other components of Bradford’s industrial heritage. Their redevelopment may provide opportunities to secure the productive reuse of historic buildings, address dereliction and reinforce local identity. Policy HE1 requires proposals affecting designated or non-designated assets to be supported by proportionate heritage assessment and to conserve their significance, character and setting. Archaeological assessment and evaluation will also be required where sites have known or potential archaeological interest.

8.7.25 In addition to the sites specifically referenced, the Plan evidence includes detailed Heritage Impact Assessments (HIAs) for allocated sites for which there are heritage sensitivities in terms of for example listed buildings and conservations areas. The extent of any mitigation measures is detailed within the specific site allocations within the Local Plan.

8.7.26 The HIA work stream has been completed by CBMBC with support from conservation specialists and advice from Historic England. It is therefore considered that appropriate policy measures are in place to help manage negative effects upon heritage.

8.7.27 More broadly, the spatial strategy (Policy SS1) supports a heritage-led approach to the sensitive reappropriation and reuse of historic mill sites and industrial architecture to act as a driver for housing, economic growth and regeneration of areas. Meanwhile, the growth strategy (Policy SS2) is in place to ensure the sensitive conversion and reuse of vacant buildings, including mill buildings having regard to their heritage. Furthermore, Policy ST1 indicates that development will be supported where it includes policies designed to protect, conserve and enhance the built assets of the district, and Policy ST4 requires development to respond to the culture and heritage of the local area.

8.7.28 There is evidence from previous regeneration initiatives within Bradford that investment in the built and historic environment can deliver wider townscape, economic and place-making benefits. The Plan's focus on heritage-led regeneration, urban renewal and the reuse of historic buildings therefore has the potential to generate positive effects which extend beyond the conservation of individual assets and contribute towards the enhancement of wider townscape character.

Other policies

8.7.29 The Bradford Local Plan includes policy provisions in relation to the built environment. The key policy in this regard is Policy HE1, which is concerned with proactively conserving, protecting and enhancing the character, archaeological and historic value of Bradford’s designated and non-designated heritage assets and their settings, in a manner appropriate to their significance.

8.7.30 This includes specific provisions relating to the Saltaire World Heritage Site, designated and non-designated heritage assets, listed buildings, and archaeology, as well as provisions aimed at supporting heritage-led regeneration and ensuring that the historic environment can adapt to the effects of climate change without harming the significance of heritage assets. Policy HE1 also requires development proposals affecting designated or non-designated heritage assets to be supported by a Heritage Statement, where appropriate, setting out how the proposal will respect and reinforce the distinctive character of the area. For development within the Saltaire World Heritage Site or its Buffer Zone, Heritage Statements are required to demonstrate how the Outstanding Universal Value of the World Heritage Site, including its setting and key views, will be conserved.

8.7.31 These provisions are anticipated to contribute positively towards the conservation and enhancement of the built and historic environment by

ensuring that the significance and setting of heritage assets are appropriately considered through the development process.

8.7.32 Wider policy provisions also embed built and historic environment considerations into the Bradford Local Plan. This includes ensuring that the character of development is informed by Conservation Area Assessments and Appraisals (Policy DS3) as well as recognising the importance of the Saltaire World Heritage Site and all listed buildings (Policy DS1), and ensuring that new development responds positively to local historic form and does not detract from heritage assets (Policy DS3). It also includes a focus on ensuring that the heritage of town centres is protected and enhanced through development and public realm improvements (Policy TC2), supporting the economic role of heritage assets (Policy EC4), and requiring telecommunications infrastructure to preserve and enhance the significance of designated heritage assets, areas and features and their settings (Policy SC6). Other policies also seek to ensure that cultural heritage and the historic environment are appropriately considered through development proposals, including in relation to transport infrastructure, minerals and waste development (Policies TR3, MIN7, and WAS4). Collectively, these policies are likely to support the conservation and enhancement of heritage assets and their settings, while also helping to reinforce local distinctiveness, townscape character and the role of the built and historic environment in regeneration and the wider economy.

Overall effects

8.7.33 The Plan is predicted to result in both positive and negative effects in relation to the historic environment, heritage assets and townscape character. Growth has the potential to affect the setting of heritage assets, conservation areas and historic townscapes, particularly where development is proposed on the edge of existing settlements or within sensitive heritage settings.

8.7.34 Whilst the policy framework and site-specific requirements are expected to mitigate many of these effects, some localised **minor negative effects** are likely to remain.

8.7.35 Conversely, the Plan places a strong emphasis on urban regeneration, the reuse of previously developed land and buildings, and the conservation and reuse of historic mills and other heritage assets. This creates opportunities to secure investment in the historic environment, improve townscape quality and reinforce local distinctiveness, particularly within Bradford, Shipley and Keighley. As such, **moderate positive effects** are predicted.

8.8 Connectivity

IA Objectives

8a) To develop and maintain an integrated, efficient and accessible transport network that maximises access, increases sustainable transport choice, reduces congestion, and reduces the need to travel by private car/ lorry.

9a) To ensure that communities have good access to a range of good quality services and connections to wider social, environmental and economic networks.

Growth strategy and allocations

8.8.1 In terms of accessibility to public transport, only three allocated sites are not within walking distance (<800m) of the nearest bus stop. However, it is recognised that these three sites are within 800-1,000m of a bus stop. Whilst the majority of sites are not within walking distance of the nearest train station, bus routes are likely to provide connections. Nevertheless, it is also noted that 46 allocated sites are over 5km from the nearest train station.

8.8.2 Regarding active travel, all the sites are within walking distance of the nearest public right of way (PRoW). As such, it is considered that the sites have good access to sustainable and active travel opportunities.

8.8.3 Focusing on access to employment opportunities, 26 sites are over 5km from the nearest employment zone. However, as noted above, almost all sites are within walking distance to a bus stop, which will likely provide connections to these employment zones. This is important given the most popular method used to travel to work in Bradford is driving a car or van (50%). It is also noted that Bradford has a high level of congestion compared to the national average, concentrated at local hot spots during peak times.

8.8.4 In terms of access to services and facilities, 169 sites are within walking distance of the nearest local centre, whilst 135 sites are within walking distance of the nearest GP surgery. In this respect the strategy prioritises development in accessible locations where possible and this is demonstrated by the allocation characteristics.

8.8.5 This approach is confirmed and strengthened through policies SS1/SS2, which set out the settlement hierarchy and direct higher levels of growth within Bradford City, followed by towns and smaller settlements. This ensures that residents have good access to local facilities and services, promotes sustainable and active modes of travel and reduces reliance on private vehicles.

8.8.6 In terms of access to recreational facilities, all sites are within walking distance of the nearest open space. However, only 27 sites are within walking distance of the nearest sports centre / pool. Nevertheless, the level of access to open spaces is a positive and the plan performs well in this respect.

8.8.7 Finally, regarding access to educational facilities, 178 sites are within reasonable walking distance of the nearest primary school (within 800m), whilst only 31 sites are within walking distance of the nearest secondary school. However, secondary school age students will likely utilise the bus network to access school, which the allocated sites are well connected to.

8.8.8 Regarding the strategic policy framework relating to transportation, Policy ST2 sets out that the Council will support the transformation of the transport network to progressively encourage more people to travel by more sustainable modes including walking, cycling and public transport, and freight to be transported by sustainable means such as rail and low / zero carbon vehicles. To achieve this, the Council will support a wide range of transport schemes as set out in the Local Infrastructure Plan. Alongside this, transport needs will be met through demand reduction; modal shift; and future mobility.

8.8.9 In addition, Policy ST3 requires development proposals follow the settlement hierarchy and be located in areas which are close to services and facilities and/or in areas where there are opportunities to access sustainable transport modes, including walking, cycling and public transport. This will support connectivity by ensuring residents are not reliant on the private vehicle.

Other policies

8.8.10 The transport policies are key in relation to connectivity in Bradford. This is due to their focus on safeguarding land to ensure transport schemes can successfully be implemented, including local cycling and walking infrastructure routes, mass transit schemes, and rail development (Policy TR1). It is also demonstrated through policy requirements that ensure development is located in proximity to sustainable transport connections (Policy TR2), and a focus on promoting walking and cycling by supporting the delivery of cycle routes, pedestrian routes, and a connected active travel network between homes and important economic, health and community infrastructure (Policy TR4). Furthermore, Policy TR3 is anticipated to have an effect on connectivity through setting parking standards for development, and balancing parking provision with active and sustainable transport needs (for example, by reducing on-street parking so that roads are more readily accessible by public transport, cycling and walking). As such, these policies are anticipated to improve connectivity within Bradford by providing additional and more varied transport connections, which could also reduce pressure on the road network and help to reduce traffic-related issues.

8.8.11 Other Plan policies are also likely to contribute towards connectivity. This is likely to be achieved through provisions which seek to improve active and sustainable transport connectivity with important infrastructure (Policy DS4), increase green and blue infrastructure along streets to encourage greater uptake of walking (Policy DS4), and ensure residential streets encourage active travel engagement and inclusivity (Policy DS4). It is also likely to be achieved by ensuring that development proposals within designated centres deliver new growth and / or infrastructure that is well served by public transport and active travel opportunities (Policy TC2). Taken together, these policies are likely to support more sustainable travel patterns and improve connectivity between homes, employment, services and community infrastructure, while also helping to reduce reliance on the private car.

Overall effects (Connectivity)

8.8.12 Positive effects are noted for accessibility as the growth strategy prioritises development in the most accessible parts of the district in terms of sustainable modes of transport (i.e. walking, cycling and public transport). In addition, the plan supports transport infrastructure improvements during the plan period, which again focus on sustainable modes of transport. There is also a heavy focus on mixed used development in urban areas and transit-oriented growth, which support sustainable modes of travel and transport (including links to longer term opportunities such as a mass transit corridor from Bradford to Leeds).

8.8.13 Alongside these positives, it is worth noting that substantial growth is concentrated on key radial corridors around Bradford on peripheral and Green Belt sites. This could lead to a short to medium term increase in car usage, if transport interventions are not delivered in a timely manner. There is also significant employment growth in industries that are likely to increase the use of HGVs, LGVs and car use. The Plan therefore presents a risk of reinforcing car-based trips and increasing congestion on key routes.

8.8.14 On balance, the positive effects are considered likely to outweigh the negatives, and a **moderate positive effect** is predicted, but with an element of uncertainty (relating to the delivery of key infrastructure). This reflects the Plan's focus on urban regeneration, transit-oriented development, mixed-use growth and sustainable transport investment. However, an element of uncertainty remains, particularly in relation to the timing, funding and delivery of key transport infrastructure and the extent to which anticipated modal shift can be achieved.

8.9 Climate and resources

IA Objectives

10. Addressing causes of climate change (mitigation)

- **10a)** Ensure the prudent and efficient use of energy and resources, whilst promoting the use of renewable and low carbon energy sources.
- **10b)** To reduce greenhouse gas emissions by supporting development that promotes sustainable travel, reduces the need to travel, and facilitates the transition to low-carbon transport.

11.Climate change resilience (adaptation)

- 11a) Minimise and manage the impacts of climate change on the district and vulnerability to its effects, particularly flood risk and overheating.

12.Natural resources (Land, soil, minerals, waste)

- 12a) To prioritise the development of previously developed land and buildings including via the remediation of contaminated land and protection of greenfield sites.
- 12b) Protect agricultural land and soils and avoid the loss of the highest-quality grades.
- 12c) To protect mineral resources from sterilisation by other uses and promote the greater use of secondary and recycled materials.
- 12d) To minimise different types of waste and increase the amount that is re-used, recycled and recovered.

13.Water resources

- 13a) Reduce water consumption, improve water quality, and ensure an adequate supply of water can be provided in Bradford whilst also reducing the potential for contamination of waterbodies and groundwater.

14.Air quality

- 14a) To safeguard and improve air quality and reduce the impacts upon human health.

Growth strategy and allocations

8.9.1 In terms of climate change mitigation, accessibility of the site allocations to active travel and public transport infrastructure is discussed above under the **connectivity** IA theme, which concludes major positive effects. As such, the plan will likely reduce emissions associated with private vehicles.

8.9.2 The spatial strategy (Policy SS1) seeks to ensure a move towards a greener economy and a resilient lower energy and low carbon future. It prioritises minimising the district's exposure to environmental threats before mitigating them through adaptation and building resilience.

8.9.3 In addition, Policy SS1 sets out that the Council will, through its plans, strategies, investment decisions and regeneration programmes, support the delivery of achievement of the three sustainable development objectives. This includes plans which promote environmental improvements.

8.9.4 Policy ST3 requires developments minimise their greenhouse gas emissions in order to contribute to achieving the district-wide target of net-zero carbon emissions by 2038, and the wider UK target by 2050. This includes by incorporating carbon reduction, mitigation, adaptation and resilience measures, and undertaking a carbon assessment of proposed development to better understand the likely carbon emissions and identify measures to reduce emissions and achieve net-zero where possible.

8.9.5 Policy ST3 also requires proposals to maximise and achieve high levels of energy efficiency; include and/or access renewable and low carbon energy technologies; include the provision of refuelling infrastructure for low / zero emission vehicles; and reduce the need for energy for lighting, heating and cooling. This is in addition to contributing to carbon sequestration and air in urban cooling and shading through green and blue infrastructure. Moreover, by improving soil health and management to enable better storage of carbon within soils.

8.9.6 Focusing next on climate change adaptation, the following sites overlap (>50%) with Flood Zone 2 and/or 3:

- North Brook Street, Valley Road (H223) (1.7ha) – 100% overlap with Flood Zone 2 and 89% overlap with Flood Zone 3
- Midlands Mills, Valley Road (H235) (1ha) – 90% overlap with Flood Zone 2 and 62% overlap with Flood Zone 3

8.9.7 Regarding surface water flood risk, only one site overlaps (>50%) with areas at risk of flooding from surface water from a 1 in 100 event, namely North Brook Street, Valley Road (H223) (1.7ha) – 78% overlap. It is noted that none of the sites overlap with a groundwater source protection zone.

8.9.8 The spatial strategy (Policy SS1) seeks to avoid increasing flood risk, as well as manage land and river catchments for flood mitigation. In addition, Policy ST3 requires development be located in areas of low flood risk; reduce flood risk through the introduction of sustainable drainage systems (SuDS) and natural flood risk management schemes; and manage the water environment and the potential impacts of drought. Moreover, Policy ST6 on the strategic GBI network covers several river corridors and requires proposals to contribute to climate change mitigation and adaptation, including natural flood management. The policy affords particular protection to watercourses and their associated corridors and areas performing critical roles in flood risk management.

8.9.9 Whilst several regeneration sites are also affected by fluvial and pluvial flood risk, these are predominantly previously developed sites that form an important part of the District's regeneration strategy. Their redevelopment will be subject to detailed flood risk assessment and careful scrutiny through the planning process, with appropriate mitigation and infrastructure enhancements required where necessary. Redevelopment may also provide opportunities to improve flood resilience and reduce existing vulnerabilities within these urban areas.

8.9.10 With regards to employment land the strategic employment sites E57, E157 and MDS2 are largely within Flood Zone 1. Several smaller sites, including E75, E83, E85, E118 and E119, are affected by localised surface-water, groundwater or culvert constraints. Policy CR4 requires the sequential approach, climate-change allowances and SuDS, with no increase in greenfield runoff and at least a 30% reduction from previously developed sites. This is supported by Policies NE1 and NE2, which promote multifunctional green and blue infrastructure and urban greening.

8.9.11 Site-specific measures provide further mitigation. E57 requires the retention of drainage ditches and surface-water flow paths within a comprehensive SuDS scheme, while E157 requires site-wide drainage integrated with landscaping and open space. At MDS2, drainage and flood resilience should form part of the required Green and Blue Infrastructure Plan. Proportionate flood-risk and drainage assessments will also be required for affected smaller sites. Significant effects should therefore be avoidable.

8.9.12 In terms of water quality, the growth strategy will ultimately increase pressure on existing water and wastewater management facilities. However, this is considered a matter which will be addressed by national policy, and the policy framework also covers this issue (see discussion on Policy CR4 below).

8.9.13 There is also potential for localised adverse effects where allocations are exposed to existing poor air quality. The following sites are adjacent to an Air Quality Management Area (AQMA), and as such have the potential to adversely impact upon human health through the delivery of development in areas with higher concentrations of pollutants:

- Spring Bank Place (H788) (0.6ha) – AQMA No. 2.
- Land and buildings south of Sunbridge Road (H218) (0.6ha) – AQMA No. 3.

8.9.14 Development in areas affected by existing poor air quality has the potential to increase exposure to pollutants for existing and new residents where additional emissions arise from development or associated activity. The site-specific policies recognise this relationship and require development to accord with the safeguarding measures in Policy CR1.

8.9.15 In terms of the potential need for ground remediation, 17 of the sites allocated through the plan overlap with a historical landfill site. In particular, several employment allocations comprise previously developed land and / or are located adjacent to existing industrial uses where there is potential for land contamination. Whilst site-specific investigations and remediation may be required, redevelopment provides an opportunity to identify, remediate and manage contamination, thereby reducing potential risks to human health and environmental quality.

8.9.16 Focusing on BMV agricultural land (i.e. Grades 1-3a), several housing sites overlap considerably with land predicted to be Grade 2 or 3a land (A total of approximately 60 ha). For example, H1353 is 3.8ha of Grade 2 land, H1279 is 9ha of Grade 3a land.

8.9.17 These losses are largely unavoidable given that there is an acceptance that greenfield loss is necessary to support growth and that other sustainability factors are important in determining what makes a 'sustainable location' for growth. Nonetheless, these are permanent negative effects that need to be acknowledged.

8.9.18 The South of Nufarm site and E57 also contain considerable areas of greenfield land, which is also likely to lead to a loss of best and most versatile land. Conversely, a number of the smaller allocations comprise previously developed land, including E75, E76, E82, E83 and E85. Their redevelopment would support the efficient use of land and may provide opportunities to remediate contamination and improve the appearance and functioning of existing employment areas.

8.9.19 It is recognised that the spatial strategy (policy SS1) seeks to ensure the efficient use of land by giving priority to the use of deliverable and developable PDL. This is followed by, in this order: the use of greenfield opportunities within settlements; the use of Grey Belt land which is not previously developed; and the release of Green Belt land in sustainable locations in line with policies SS2, ST5 and NE9. This should help to moderate any further losses of BMV agricultural land.

8.9.20 Regarding mineral safeguarding areas (MSAs), most of the site allocations overlap (>50%) with MSAs. In this respect, the plan could lead to the sterilisation of mineral resources. However, it is recognised that given the large coverage of MSAs across the district, it is difficult to avoid development on MSAs, particularly given the availability of suitable sites.

8.9.21 The growth strategy will ultimately increase the amount of waste being produced across the district, leading to additional pressure on existing waste management facilities. However, this is considered a matter which will be addressed by national policy, and the policy framework also covers this issue (see discussion on Policies WAS1, WAS2 and WAS4 below).

8.9.22 Policy ST3 requires development proposals adopt circular economy principles; make the most effective use of land; ensure the use of sustainable building materials; and minimise waste and maximise recycling. All of these measures will help ensure the efficient use of resources.

Other policies

8.9.23 The wider policies of the Bradford Local Plan are anticipated to contribute towards the climate and resources IA theme. This includes policy provisions which seek to improve air quality, including ensuring that the Council implements Clean Air Plans and Strategies and that stringent measures are in place within Clean Air Zones to support pollutant reduction (Policy CR1), as well as encouraging a modal shift towards more sustainable modes of transport (Policies TR2 and TR4). The Plan also includes provisions which work to reduce greenhouse gas emissions generated and released across the district, including through the implementation of low emission solutions, improving energy efficiency and increasing the use of renewable and low carbon energy sources (Policy CR3), and improving access to active and sustainable modes of transport (Policies TR2, TR3 and TR4).

8.9.24 These policy measures are likely to support improvements in air quality and contribute towards climate change mitigation by reducing emissions associated with energy use and transport.

8.9.25 Water resources and water quality are also key considerations of the Bradford Local Plan. Policy CR4 seeks to protect and improve the water environment, promote water efficiency and manage the potential impacts of development on water resources. The management of flood risk is also a consideration, with provisions seeking to direct development away from areas at risk of flooding and support flood mitigation measures such as sustainable drainage systems (Policy CR4). The wider approach to green and blue infrastructure, including the use of natural-based solutions and opportunities for natural flood management, is also likely to support climate change adaptation by helping to manage surface water, reduce flood risk and improve resilience to future climate impacts. There are also secondary benefits in relation to water quality to take into account.

8.9.26 Minerals and other natural resources are a further key consideration of the Bradford Local Plan. There is an emphasis on safeguarding mineral resources and infrastructure supporting a steady and reliable supply of minerals (Policies MIN1, MIN2 and MIN7). Furthermore, Policy MIN7 is also likely to contribute to the wider climate and resources IA theme by ensuring that new mineral development does not adversely impact upon flood risk, water quality, soil quality and stability, or greenhouse gas emissions.

8.9.27 Additionally, through Policy MIN8, there is also a demonstrated focus on restoring mineral sites after operations have ceased, including ensuring that soil quality is recovered (where possible), and that increased flood risk is avoided.

8.9.28 The Plan also recognises the importance of soils as a finite natural resource, including through consideration of agricultural land quality, soil health, contamination and the sustainable management and reuse of soils (Policy CR2).

8.9.29 Focusing growth through brownfield and previously developed land opportunities, where available and appropriate, and requiring suitable density thresholds is further likely to contribute by making efficient use of land resource and potentially reducing pressure for development on undeveloped land and the most productive and versatile agricultural soils (Policies HO1 and HO3).

8.9.30 The sustainable management of waste and the protection of communities from environmental risks are also relevant to the climate and resources IA theme. The Plan sets out considerations for waste, including supporting the development and enhancement of waste management capacity and movement of waste up the waste hierarchy, with prevention, reuse and recycling prioritised over disposal (Policies WAS1, WAS2 and WAS4). This is likely to support more efficient use of resources and contribute towards waste reduction and the circular use of materials. The Plan also considers hazardous installations and contaminated land, with provisions seeking to safeguard communities from potential risks associated with hazardous sites and installations and to ensure that contaminated land is appropriately assessed and remediated (Policy CR2).

8.9.31 Taken together, these policy provisions are likely to support the protection of natural and land resources and environmental quality, while also contributing to climate change mitigation and adaptation through more efficient resource use, reduced emissions and improved resilience to environmental risks.

Overall effects (air quality)

8.9.32 The level of growth involved is likely to increase travel demand and has the potential to increase emissions associated with transport and development. However, the spatial strategy focuses growth within the main urban areas and regeneration locations, helping to support sustainable transport investment, active travel and opportunities for modal shift. The Plan also contains measures aimed at improving air quality and reducing reliance on private car travel. Whilst there is uncertainty regarding the extent to which these benefits will be realised, particularly as they are dependent upon the successful delivery of regeneration and transport infrastructure, the Plan is considered likely to result in better air quality outcomes than would otherwise occur. On balance, an uncertain **minor positive effect** is predicted.

Overall effects (water resources)

8.9.33 The Local Plan is predicted to have a **neutral effect** in relation to water resources and water quality. Whilst the scale of growth proposed will increase demand for water resources and place additional pressure on wastewater infrastructure, similar pressures would be expected to arise in the absence of the Plan.

8.9.34 The Plan includes a range of measures relating to water efficiency, sustainable drainage systems, natural flood management, contaminated land remediation, and the protection and enhancement of green and blue infrastructure, which are expected to help manage these effects and protect the water environment.

8.9.35 Whilst opportunities for localised improvements may arise through regeneration and environmental enhancement projects, it is not possible to conclude with confidence that the Plan will deliver significant improvements in water quality or water resource management beyond those likely to occur under the existing policy and regulatory framework.

Overall effects (Land, soil, minerals and waste)

8.9.36 The Local Plan will result in the permanent loss of greenfield land and soil resources, including likely losses of agricultural land and areas which comprise Best and Most Versatile agricultural land. These effects arise principally from the scale of housing and employment growth proposed and are therefore considered difficult to avoid entirely. However, the Plan adopts a sequential approach which prioritises previously developed land and regeneration opportunities, promotes the efficient use of land, supports the reuse of buildings and materials, and includes policy provisions seeking to protect soil quality and ensure the sustainable management of soil resources. Whilst adverse effects associated with land take and soil loss are therefore likely to occur, the overall significance of effects is moderated by the Plan's spatial strategy and supporting policy framework. It is also important to note that housing pressures would still exist in the absence of the plan, and therefore a loss of soil resources could still arise. On balance, a **minor negative effect** is predicted.

Overall effects (climate adaptation)

8.9.37 The Local Plan is predicted to have a **minor positive effect** in relation to climate change adaptation and resilience. Whilst several sites and regeneration areas are significantly affected by fluvial flood risk, these are previously developed sites, which form important components of the District's regeneration strategy. Their development could also provide opportunities to improve resilience through redevelopment. More broadly, the Plan includes a strong framework for climate change adaptation, including provisions relating to flood risk management, sustainable drainage systems (SuDS), natural flood management, urban greening, and the protection and enhancement of green and blue infrastructure. These measures are expected to increase the resilience of the built and natural environment to the effects of climate change in the longer term. However, there is some uncertainty, as the extent of benefits achieved will depend on the successful delivery of flood mitigation measures and supporting infrastructure alongside development.

Overall effects (Addressing the Causes of Climate Change)

8.9.38 The Local Plan is predicted to have a **minor positive effect** in relation to climate change mitigation. Whilst housing and employment growth will inherently generate additional emissions, similar growth pressures would be expected in the absence of the Plan.

8.9.39 There is strong focus on urban regeneration and sustainable transport, encouragement of circular economy principles and whole-life carbon considerations, support for building reuse, and measures aimed at increasing carbon sequestration. Together, these provisions are expected to reduce emissions per capita and support a lower-carbon pattern of development than may otherwise occur.

8.10 Summary of effects

8.10.1 Overall, the IA demonstrates 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.

8.10.2 Much of the proposed growth is focused within, or adjacent to, the main urban areas and larger settlements (particularly Bradford City) 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.

8.10.3 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.

8.10.4 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 most significant adverse effects identified. There is also potential for adverse effects on landscape character, biodiversity and the setting of heritage assets. Whilst mitigation measures within the Plan are expected to avoid, reduce or offset many impacts, some residual effects are likely to remain. Nevertheless, the environmental effects are generally localised and can be moderated through careful site design, policy safeguards and project-level mitigation.

8.10.5 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.

8.10.6 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 8.3 Summary of overall Plan effects

IA Topic / Objectives	Effects
1.Communities, population and housing (Housing)	**Major positive?**
2.Communities, population and housing (Equalities)	**Major positive** / **Minor Negative**
3.Health and Wellbeing	**Major positive** / **Minor Negative**
4.Employment and economy	**Major positive**
5.Natural Environment (Landscape and townscape)	**Moderate positive** **Moderate negative?**
6.Natural Environment (Biodiversity)	**Neutral**
7.Built Environment (Heritage and townscape)	**Moderate positive** **Minor Negative**
8.Connectivity (Transport) **9. Connectivity** (Sustainable community growth)	**Moderate positive?**
10.Climate and Resources (Addressing causes of climate change)	**Minor positive**
11.Climate and Resources (Climate change resilience)	**Minor positive**
12.Climate and Resources (Land, soil, minerals and waste)	**Minor negative**
13.Climate and Resources (Water)	**Neutral**
14.Climate and Resources (Air quality)	**Minor positive?**

9. Mitigation and enhancement

9.1 Introduction

9.1.1 This section summarises the key mitigation and enhancement measures identified through the iterative IA process during the preparation of the plan. The recommendations are intended to strengthen the sustainability performance of the plan by avoiding or minimising adverse effects and maximising positive outcomes across the IA objectives.

9.1.2 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. These are summarised below:

Table 9.1 Recommendations made at Reg 18 stage

Recommendations	Response
Spatial Strategy • Prioritise resource-efficient development. • Protect ecologically valuable land and high-quality agricultural soils. • Avoid adverse effects on local character arising from greenfield releases. • Protect accessible green spaces that contribute to health and wellbeing.	The updated Local Plan Spatial Strategy (SS1, SS2) seeks to prioritise the development of previously developed sites for new development within sustainable locations within the District. The Local Plan includes policies to ensure new development protects, enhances ecological assets (NE4), agricultural land (CR2) and green spaces and character of the area (DS3). The site allocation policies issues/constraints that development should consider/address.
Green Belt • Avoid irreversible loss of Best and Most Versatile agricultural land. • Avoid development on upslope Green Belt land where it could worsen flooding. • Strengthen green infrastructure and biodiversity enhancement measures. • Prioritise sites with good walking and cycling accessibility.	The Council has considered all of these factors via the site selection process, based on the findings of a range of supporting evidence. The Local Plan includes policies to ensure new development protects BMV agricultural land (CR2), minimises flood risk (CR4); as well as ensure development is located within the most accessible locations of the district to reduce car use and promotes sustainable modes of transport (ST2, TR4).

Recommendations	Response
Housing Growth • Incorporate renewable and low-carbon energy measures. • Improve sustainable travel connections. • Maximise use of previously developed land. • Minimise Green Belt and greenfield land release. • Deliver green infrastructure, flood storage and SuDS. • Promote sustainable water use. • Enhance biodiversity networks. • Ensure healthcare, education and community infrastructure are provided alongside growth.	The Council has undertaken a comprehensive, robust site assessment and selection process, to prioritise the delivery of new development on previously developed sites. However, given the scale of needs and lack of alternative options, exceptional circumstances have been demonstrated for the release of sites to accommodate future needs. The Local Plan includes policies to ensure proposals; provision of renewable/low carbon energy (CR3), minimise flood risk (CR4), support biodiversity (NE5), provide new and enhanced infrastructure and (ID1,2) include support sustainable transport.
Employment Growth • Locate employment land in accessible locations. • Encourage circular economy principles. • Reuse excavated materials and reduce waste. • Ensure adequate water supply and efficiency measures. • Deliver high-quality employment environments.	The Local Plan is proposing to allocate 20 employment sites to address future need. These are located within accessible distance to existing communities and new housing. It also includes policies to ensure development provides or enhances sustainable transport links to and from these. The Plan includes policies in relation to matters such as waste management including the re-use of construction materials (WAS1), water infrastructure and high-quality design (e.g. DS1-4).
Environmental Policy Recommendations **Biodiversity** • Strengthen habitat connectivity. • Ensure net increases in tree cover. • Expand woodland and hedgerow networks. • Improve biodiversity along river corridors.	The Local Plan includes a range of policies to ensure new development protects and enhances an area's ecological and heritage assets (.i.e.NE 1, 4, 7,6, HE1). The Plan also includes policies to deliver new or enhanced blue and green infrastructure, habitat connectivity, urban greening, as well as assessing proposals that

Recommendations	Response
• Clarify circumstances where development benefits can outweigh impacts on designated sites.	may potentially result in adverse impacts on ecological assets (i.e. NE1, 3,4, 5).
Renewable Energy • Set more ambitious and clearly defined renewable energy targets.	In line with the NPPF, Policy CR3 sets out a positive strategy to support the delivery of renewable and low carbon energy sources.
Minerals • Increase use of recycled and secondary materials. • Deliver biodiversity net gain through site restoration. • Reduce pollution and traffic impacts. • Improve water recycling and management during extraction.	The Local Plan includes policies to increase the use of recycled and secondary materials within new developments, deliver net gains in biodiversity, efficient use of water, reduce traffic impacts and pollution (i.e. MIN1, MIN7, CR1)
Design • Integrate renewable energy into development design. • Deliver biodiversity enhancements and net gain. • Improve accessibility for vulnerable groups. • Strengthen crime prevention measures.	The Local Plan includes policies to the support the inclusion of new low carbon renewable energy provision in new development
Infrastructure • Incorporate renewable energy and sustainable construction standards. • Avoid greenfield land release where possible. • Ensure infrastructure is accessible by walking, cycling and public transport. • Consider biodiversity within viability assessments.	The Council has taken a comprehensive, robust site assessment and selection process, to prioritise the delivery of new development on previously developed sites. However, given the scale of needs and lack of alternative options, exceptional circumstances have been demonstrated for the release of sites to accommodate future needs. The Local Plan includes policies to ensure proposals; include renewable/low carbon energy (CR3), support sustainable construction, support use of sustainable modes of transport (TR -4). The Local Plan Viability

Recommendations	Response
	Assessment considered the potential impact of requiring proposals to include measures to deliver new/enhanced biodiversity on the viability of development.
SUE (Strategic Urban Extension) Mitigation Measures • Energy efficient design. • Renewable and low-carbon energy generation. • Heat networks. • Layouts that reduce car dependency. • Minimise construction waste. • Provide recycling facilities. • Promote resource-efficient development. • Maximise brownfield reuse. • Reuse buildings and materials. • Minimise loss of greenfield land and agricultural soils. • Avoid flood risk areas. • Deliver SuDS. • Retain permeable surfaces. • Protect watercourses and water quality. • Retain trees and hedgerows. • Protect priority habitats and ancient woodland. • Enhance ecological networks. • Deliver biodiversity net gain. • Increase tree canopy cover. • Provide landscaping and green infrastructure buffers. • Respect local character and views. • Protect heritage settings and archaeology. • Improve bus provision. • Deliver walking and cycling infrastructure. • Improve rights of way. • Reduce reliance on private vehicles. • Deliver affordable housing.	The Local Plan includes site allocation proforma policies which set out all of the issues, constraints that potential opportunities that development should address, as well as assets that should be protected and enhanced, generally in line with the mitigation measures proposed. In addition, it includes policies to increase the provision of low carbon renewable energy, promote sustainable modes of transport, increase biodiversity, deliver new infrastructure, etc in new developments.

Recommendations	Response
• Provide open space and community facilities. • Ensure access to healthcare and recreation. • Provide education contributions and, where necessary, new schools	

9.1.3 At Regulation 19 stage, only a small number of residual recommendations are made (see table 9.2 below), recognising that the Plan has been informed by previous IA work alongside other detailed technical studies which have helped to identify suitable mitigation and enhancement measures.

9.1.4 The appraisal has not identified any fundamental issues that would undermine the overall strategy or necessitate substantial amendments to the Plan. Instead, the remaining residual effects largely relate to the inherent consequences of accommodating growth, particularly where development requirements must be balanced against environmental constraints. Accordingly, the recommendations set out below focus on proportionate measures relating to implementation, delivery and monitoring. These are intended to help maximise positive outcomes, manage areas of uncertainty and ensure that any unforeseen effects can be identified and addressed through ongoing plan monitoring and review.

Table 9.2 Recommendations made at Reg 19 stage

Recommendations
The appraisal identifies the loss of agricultural land as one of the most significant residual adverse effects of the Plan, particularly in relation to strategic growth locations. Whilst development requirements limit opportunities to avoid such impacts entirely, careful site design and soil management can help reduce effects. Therefore, it is recommended that loss of Best and Most Versatile (BMV) agricultural land is minimised where practicable through detailed site design and masterplanning. For major greenfield allocations, encourage / require the preparation of Soil Resource Plans to retain and reuse soils on-site. Include supporting text within the Natural Environment chapter stating that, where development is proposed on Best and Most Versatile (BMV) agricultural land, applicants should demonstrate that loss has been minimised through site design and that opportunities to retain, recover and beneficially reuse soil resources have been considered.
Many of the Plan's anticipated social, economic and environmental benefits depend upon successful delivery of regeneration and previously developed land. Delays could increase pressure for development in less sustainable locations. Therefore, it is recommended that progress is regularly monitored against anticipated delivery trajectories.

Recommendations

Focus should be placed on ensuring new development is integrated with planned public transport improvements and future mass transit initiatives where relevant. Timely delivery of supporting transport infrastructure will be important in achieving these outcomes and could be expressed through masterplanning requirements for major sites. Amend supporting text for strategic growth locations to clarify that major developments should secure early delivery of walking, cycling and public transport connections, helping to reduce reliance on private car travel from the outset of development.

Strengthen supporting text relating to Biodiversity Net Gain to encourage habitat creation and enhancement measures that contribute to ecological connectivity and Local Nature Recovery Strategy priorities, particularly around larger allocations and strategic growth locations.

Strengthen supporting text for development adjacent to sensitive landscapes, strategic gaps or settlement edges to emphasise the importance of masterplanning, landscape-led design and the retention of features that contribute to local character and settlement separation.

9.1.5 The Council will consider these residual recommendations alongside any comments received throughout the Regulation 19 consultation. The examination process provides an opportunity to make further changes to the Plan if these are considered necessary to make it ‘sound’.

10. Monitoring and next steps

10.1 Monitoring

10.1.1 The SEA Regulations[9] require the significant environmental effects of implementing a plan to be monitored in order to identify any unforeseen adverse effects and enable appropriate remedial action to be taken where necessary. Monitoring should therefore focus on the significant effects identified through the appraisal, rather than attempting to monitor every predicted effect.

10.1.2 Monitoring measures should be proportionate and practical, taking account of the availability of data and existing monitoring measures. In developing the proposed monitoring framework, consideration has therefore been given to the indicators already established through the Local Plan monitoring framework, together with relevant monitoring measures, indicators and targets contained within related plans, programmes and strategies. This approach helps to minimise duplication whilst ensuring that the key sustainability effects of the Plan can be effectively monitored. Where necessary, new indicators are proposed to complement any existing / proposed monitoring measures.

10.1.3 **Table 10.1** summarises the effects of the Plan together with the proposed monitoring indicators. Measures will be finalised once the Plan is adopted and will be set out in an SA Adoption Statement in accordance with the SEA Regulations.

Table 10.1 Potential monitoring indicators

IA topic	Proposed monitoring indicators
1.Communities, population and housing (Housing)	• Monitoring housing delivery against the Local Plan housing trajectory: – Completions in previous years (since 2025) – Completions in reporting year – Extant planning permissions – Managed delivery target • Five year supply of deliverable housing. • Number and percentage of dwellings completed against the following density (dwellings per hectare (dph)) requirements: – 35 dph (net) across the district – 50 dph (net) within 800m of a well-connected station – 75 dph (net) within 800m of a well-connected station and with a 70+ connectivity score – 150 dph (net) within the regional city or a principal town with an 80+ connectivity score – 300 dph (net) within the defined city centre

[9] Environmental Assessment of Plans and Programmes Regulations 2004.

IA topic	Proposed monitoring indicators
2. Communities, population and housing (Equalities)	• Net additional dwellings, by size, type, and tenure: – In current year With extant planning permission • The number and percentage of affordable homes: – For the district. – By market sub-area. – On rural exception sites. • The number of planning approvals made by individuals, developers or groups / organisations which include self-build and custom build housing types and / or service plots for self-build. • Net additional pitches for gypsies and travellers. • Monitor the delivery of new homes against the national space standards and building regulation requirements.
3. Health and wellbeing	• Amount of new and loss of community facilities and infrastructure. • Number of new education facilities. • Number of wards with LSOAs in the bottom 10% most deprived for health deprivation. • Number, type and amount of financial contributions through CIL and / or S106 towards health care. • Number of Health Impact Assessments (HIA). • Number, type and amount of financial contributions through CIL and / or S106 towards other facilities and / or infrastructure.
4.Economy and employment	• Number and distribution of wards with LSOAs in bottom 10% nationally for education, skills and training deprivation. • Number of wards with LSOAs in bottom 20% most deprived for employment deprivation. • Overall employment rate. • Amount of employment land (ha) and floorspace (sqm) developed, by type. • Amount of employment land (ha) and floorspace (sqm) lost to alternative uses (non-B use class): – On allocated employment sites – In employment zones
5.Natural environment (Biodiversity)	• Percentage of development permitted that includes green infrastructure provision – ‘Number of developments achieving 10% biodiversity net gain’.

IA topic	Proposed monitoring indicators
	• Conservation status of Habitats and Species of Principal Importance. • The number and percentage of major development proposals meeting the following Urban Greening Factor scores: – Residential minimum score 0.4 – Commercial / Industrial minimum score 0.3 • Number and change in areas of biodiversity, geological and landscape importance (i.e., loss or additions (ha) of SSSIs etc). • Number and percentage of ancient woodland or of veteran trees lost.
6.Natural environment (Landscape)	• The number and percentage of major development proposals meeting the following Urban Tree Canopy Cover (UTCC) standards: – Residential minimum 25% tree canopy cover – Commercial / Industrial minimum 16.5% tree canopy cover • Number of new developments (by type) in the Green Belt: – Completed annually • Amount of new development within the South Pennine Moors SPA / SAC zones: – Completed annually – With extant planning permission
7.Built environment (Heritage)	• Number and percentage of listed buildings in the Saltaire World Heritage Site deemed to be 'at risk'. • The condition of the key views to and from the Saltaire World Heritage Site to be maintained and improved. • Number and percentage of listed buildings deemed to be 'at risk'.
8. Connectivity (Transport) **9. Connectivity (Sustainable** Community Growth)	• Mode share of journeys to work by walking, cycling and public transport (%). • Number or length (km) of new walking and cycling routes delivered. • Traffic volumes on key routes (AADT). • Percentage of new homes within 400m of a bus stop. • Percentage of new homes within 800m of a local centre. • Percentage of new homes within 800m of a primary school. • Length of new walking and cycling routes delivered

IA topic	Proposed monitoring indicators
10.Climate and resources (Addressing the causes of Climate Change)	• Number of developments including renewable energy low carbon sources.
11.Climate and resources (Climate Change Resilience)	• Number of planning permissions granted contrary to Environment Agency advice in areas at risk of flooding. • Number, type and amount of financial contributions through CIL and / or S106 towards flood prevention. • Number of planning permissions incorporating SuDS.
12. climate and resources (Land, soil, minerals and waste)	• The number and percentage of dwellings being developed on Previously Developed Land (PDL). • Amount of contaminated land remediated through development. • Development permitted within Mineral Safeguarding Areas. • Amount of residual waste sent to landfill. • Household waste recycling rate
13.Climate and resources (Water)	• Number of planning permissions granted contrary to Environment Agency advice on water quality grounds • Number of km of rivers that are protected and enhanced through the WFD' Percentage of watercourses that meet designated standards
14.Climate and resources (Air quality)	• Measure air pollutants within Air Quality Management Areas (AQMA)

10.2 Next steps

10.2.1 This IA Report accompanies the Pre-Submission (Regulation 19) version of the Bradford Local Plan and brings together the findings of the assessment undertaken throughout the preparation of the Plan.

10.2.2 The Pre-Submission Local Plan and this IA Report will be subject to consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Following consultation, the Council will consider all representations received before submitting the Plan, together with the supporting evidence base, for independent Examination.

10.2.3 During Examination, the appointed Planning Inspector will consider whether the Plan has been prepared in accordance with the relevant legal and procedural requirements and whether it is sound. Where changes to the Plan are proposed during the Examination process, further Integrated Assessment work may be undertaken, where necessary, to assess the likely significant effects of any modifications.

APPENDIX A Consultation feedback on the IA at Regulation 18 stage

Bradford Local Plan - Preferred Options (Reg 18) SA Representations and Responses

No.	Respondent	Representation	Arcadis Response	AECOM Response
1	5494 (Agent: 5373) 17325 Site: WI3/H Support	We support the proposed allocation of site WI3/H as a sustainable extension to Wilsden. The proposed site allocation consists of agricultural fields extending to approximately 3ha to the north of Wellington Road. The site is attached to existing residential development on two sides (east and south) and located in a sustainable location with good access to existing services and facilities, particularly health facilities. We support the findings of the Sustainability Appraisal for the site which concludes that the site could deliver a major positive effect for residents on the health objectives as a result of being within the target distances for all the necessary health facilities. The site scores negatively major adverse effect for two objectives relating to, 3. Land and Buildings and, 6. Biodiversity and geodiversity. In relation to Land and Buildings the SA states; "*There is a large area of greenfield land within the boundary and therefore development on this area would be considered as an inefficient use of the land resource. Southern portion of the site has some hardstanding and an existing building which might present opportunities for reusing structures or construction materials. ALC Grade 4*." This score is based on the size of the site. We agree with the score in accordance with the methodology but note that preferred policy SP5 sets out exceptional circumstances for the release of Green Belt sites to meet the housing requirement. A mixed site, WI1/H is allocated in Wilsden and two greenfield allocations including site WI3/H are allocated to meet the requirement.	Major adverse effect has been awarded on Biodiversity for site WI3/H as the sue HRA Screening process identified likely significant effects on the South Pennine Moors SPA/SAC due to recreational pressures. Further HRA work may be needed to help screen out this potentially significant effect. Further HRA work may be needed to help screen out a potentially significant effect on the South Pennine Moors SPA/SAC.	Agree with Arcadis response. Major adverse effect for Site WI3/H seems appropriate at this stage of assessment, as the HRA screening process has identified the potential for significant effects on the South Pennine Moors SPA/SAC from recreational pressures.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		The effect on 6. Biodiversity and geodiversity is scored as major adverse in the sustainability appraisal for all the proposed allocations in Wilsden including site WI3/H. Based on the methodology in the Interim SA/ SEA report and size of the site we consider the score for site WI3/H should be minor adverse. With regard to the potential impact on the local or regional designations, further information is required to inform if there is any negative impact on sites more than 3km away. Site WI3/H scores negatively (minor adverse) in relation to energy and greenhouse gases, waste, water resources, landscape and townscape, cultural heritage and air quality. It is considered that future site specific information and development proposals will ensure adverse effects on these criteria are avoided or mitigated. Positive scores are given to all other 10-19 socio economic themed sustainability objectives which we support. We support the Green Belt Assessment which concludes that the site performs a low role when assessed against the purposes of the Green Belt. The existing green belt boundary in the area is weak, development of the site could provide a new boundary consistent with the landscape character of the area.		
2	103 19924 SA Report Object	Natural England notes that the Interim Sustainability Appraisal (SA) Report provided in support of the Draft Local Plan is not intended, and is not able, to fully satisfy the requirements of a Strategic Environmental Assessment (SEA) Environmental Report at this stage of the plan-making process, and a that a further iteration will be undertaken following public consultation, which will take into account changes to the Draft Local Plan, as well as comments on the SA itself. At this stage, Natural England advise that while Section 2.1.3 of the Interim SA Report sets out the key sustainability issues for consideration, we note that there are other sustainability issues that should be included, including amending the assessment criteria to include greater consideration of the protection of BMV agricultural land and soil resources from inappropriate development.	Comments noted with thanks and will be considered in the next iteration of the SA. Propose next SA report considers NE's suggestions, including additions to the assessment criteria.	A new scoping report has been prepared that takes into account comments received at Reg18 stage. The assessment framework adequately covers the consideration of BMV agricultural land. Ecological connectivity is also considered more through the updated framework.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		We also consider that there is scope for further consideration of opportunities that enhance ecological connectivity as part of the assessment criteria. There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We therefore suggest adding additional wording that captures the principle of ensuring that current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced. Notwithstanding the above, overall Natural England has concluded that a significant amount of further work is required to complete the SA for the Draft Local Plan, and on this basis, we will provide detailed comments once the finalised SA has been published for further consultation.		
3	6935 29085 SA Report Support	Climate change The UK planning and environmental legislation sets out that local plans must include robust evidence-based carbon targets. There is a legal duty through the Planning and Compulsory Purchase Act of 2004 that requires local plans to include policies “designed to secure” that development and use of land contributes to the mitigation of, and adaptation to, climate change. The Local Authority needs to set local carbon targets based on an assessment of local potential and taking into account national and international targets. Planning policies then need to be developed that are consistent with these targets and a monitoring mechanism created to allow for review of future performance. The Environmental Assessment of Plans and Programmes Regulations 2004 – which implement the Strategic Environmental Assessment (SEA) Directive creates a legal duty and require that a plan’s cumulative climate impacts are assessed and taken into account. This includes assessing the consistency of proposed policies with all relevant climate objectives and targets. Along with these legal duties, there is further support in Chapter 14 of National Planning Policy Framework (NPPF) that local policy should support "radical reductions" (para 148) in emissions in line with the Climate Change Act 2008. We draw your attention to the ADEPT	Support for the SA is noted with thanks. No comments on this representation. Comments to be noted.	Agree with Arcadis response. Comments noted. SA baseline appendix updated in 2022 Policy review appendix updated in 2022. Full scoping report update undertaken in 2026.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		guidance on 'Preparing for a Changing Climate: Good Practice Guidance for Local Government'. This is designed to assist local government with preparing for the impacts of change adaptation.		
4	6935 29088 SA Report Support	Water Resources & Water Quality Local Plans should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the LPA area. Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and LPAs should work closely with water companies when they are producing their Local Plans. This information should be reflected in the Sustainability Appraisal (SA) of the Local Plan. We encourage LPAs to ensure emerging Local Plans and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings/phasing of development. Water Cycle Studies and Infrastructure Delivery Plans can help with understanding of what is needed and are therefore an important part of the evidence base. Local Plans should consider the environmental capacity of the water environment using evidence sources such as the RBMPs. The quality and capacity of the existing wastewater treatment works and sewerage network should also be considered. Water companies hold information and data to help with this. Additional capacity may be required to serve increased housing numbers. Where this is the case LPAs should work with water companies and us to understand the impact increased development would have on the receiving water environment, and the practicalities of water companies providing necessary upgrades.	Support for the SA is noted with thanks. No comments on this representation. Comments to be noted.	Agree with Arcadis response. SA baseline appendix updated in 2022 Policy review appendix updated in 2022. Full scoping report update undertaken in 2026.
5	6935 29089 SA Report Support	Flood Risk The policy and site allocations in Local Plans provide an opportunity to address flood risk and coastal change. The Sustainability Appraisal (SA) for the Local Plan is an opportunity to incorporate evidence and advice into plan making.	Support for the SA is noted with thanks. Subsequent iterations of the SA should include an updated baseline, with information and objectives on flood risk and coastal change included. This may lead to a potential update to Objective 4, which currently comprises: 'To reduce and	A full scoping update has been undertaken which takes the factors outlined into account. This led to comprehensive changes to the SA/IA Framework.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		The SA should include baseline information and objectives on flood risk and coastal change.	manage the impacts of climate change on the District and vulnerability to its effects' and the indicators include: • Number and type of flooding incident • 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) The next stage of SA should include an update to the baseline, key sustainability issues and opportunities, and potential updates to the SA Framework.	
6	6935 29114 SA Report Support	<u>Groundwater & Contaminated Land</u> The Water Environment (WFD)(E&W) Regulations 2017 and The Groundwater (WFD) (England) Direction 2016 set out objectives for groundwater including aiming for good chemical and quantitative status; reverse upwards trends in pollution; and preventing or limiting the entry of certain substances to waterbodies. Local Planning Authorities (LPAs) must have regard to these objectives and therefore should ensure their decisions help achieve these goals. Dealing with land contamination can help contribute to achieving the objectives of the Water Framework Directive. Local Plans should be produced with an understanding of how local communities use their groundwater and the location of potentially contaminated land. The Sustainability Appraisal (SA) for the Local Plan is an opportunity to incorporate evidence and advice into plan making. The SA should reflect groundwater and contaminated land matters.	Support for the SA is noted with thanks. Subsequent iterations of the SA should include an updated baseline, with information and objectives also being updated. This may include updating objectives relating to Groundwater and contaminated land matters, which are currently considered under two objectives: SA Objective 5: To safeguard and improve water resources - Is the site within a groundwater source protection zone? SA Objective 3: To make efficient use of existing land and buildings -	SA baseline appendix updated in 2022 Policy review appendix updated in 2022. Full scoping report update undertaken which includes consideration of water resources and contaminated land.

No.	Respondent	Representation	Arcadis Response	AECOM Response
			Number of developments remediating contaminated land. The next stage of SA should include an update to the baseline, key sustainability issues and opportunities, and potential updates to the SA Framework.	
7	6935 29115 SA Report Support	<u>Flood Risk</u> The policy and site allocations in Local Plans provide an opportunity to address flood risk and coastal change. The Sustainability Appraisal (SA) for the Local Plan is an opportunity to incorporate evidence and advice into plan making. The SA should include baseline information and objectives on flood risk and coastal change.	Support for the SA is noted with thanks. Subsequent iterations of the SA should include an updated baseline, with information and objectives on flood risk and coastal change This may lead to a potential update to Objective 4, which currently comprises: 'To reduce and manage the impacts of climate change on the District and vulnerability to its effects' and the indicators include: • Number and type of flooding incident • 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) The next stage of SA should include an update to the baseline, key sustainability issues and opportunities, and potential updates to the SA Framework.	SA baseline appendix updated in 2022 Policy review appendix updated in 2022. Full scoping report update undertaken which includes consideration of flood risk. Coastal change is considered irrelevant to Bradford. SA/IA Framework updated and comprehensively addresses flood risk matters.

No.	Respondent	Representation	Arcadis Response	AECOM Response
8	6935 29291 SA Report - SA Objective 2 Support	<u>SA Objective 2: Waste</u> We welcome and support this objective. Waste Local Plans provide an opportunity to improve the management of waste and resources. Please also see our comments on waste within the relevant polices and the covering letter in our other response letters.	Support for the SA is noted with thanks. No comments on this representation specifically.	Agree with Arcadis response. Comments noted. Waste remains an element of the scoping update and IA Framewoek.
9	6935 29292 SA Report - SA Objective 4 Support	<u>SA Objective 4: Climate Change</u> We welcome and support this objective. Please note our comments within the covering letter on climate change and how the UK planning and environmental legislation sets out that local plans must include robust evidence-based carbon targets.	Support for the SA is noted with thanks. Subsequent iterations of the SA should include an updated baseline, with information and objectives updated as relevant in relation to evidence-based carbon targets. Comment to be noted including the need to potentially develop evidence-based carbon reduction targets.	SA baseline appendix updated in 2022 Policy review appendix updated in 2022. Full scoping report update undertaken which includes consideration of carbon and climate change mitigation issues.
10	6935 29293 SA Report - SA Objective 5 Object	<u>SA Objective 5: Water Resources</u> We welcome and support this objective. We welcome the reference made to ecological and chemical status of surface waters under the Water Framework Directive (WFD) which has been identified as a key indicator for the SA Objective 5. Reference to groundwater and preventing pollution should also be included here. Local Plans should be produced with an understanding of how local communities use their groundwater and the location of potentially contaminated land. The Sustainability Appraisal (SA) for the Local Plan is an opportunity to incorporate evidence and advice into plan making. The SA should reflect groundwater and contaminated land matters. Please also see our comments on water resources and water quality within the relevant polices in our other response letters. We consider that water resources should be better reflected within the Local Plan objectives to reflect this SA objective.	Ground water protection is included within an indicator under SA Objective 5 (Is the site within a groundwater source protection zone?) The Number of developments remediating contaminated land - is included as an indicator under SA Objective 3. The next stage of SA should include an update to the baseline, key sustainability issues and opportunities, and potential updates to the SA Framework.	Full scoping report update undertaken which includes consideration of water resources and groundwater (which is also referenced in the updated IA framework)

No.	Respondent	Representation	Arcadis Response	AECOM Response
11	6935 29295 SA Report – SA Objective 6 Support	<u>SA Objective 6: Biodiversity & Geodiversity</u> We welcome and support this objective. As above, we welcome the reference made Water Framework Directive (WFD) which has been identified as a key indicator for the SA Objective 5, we would also recommend that this is replicated within SA Objective 6: 'To conserve and enhance geodiversity, biodiversity, including the internationally, nationally and locally valued wildlife species and habitats' as blue infrastructure and improved water quality is also fundamental to supporting biodiversity (along with green infrastructure, which has been identified) and improving our surface waters will support ecological connectivity across Bradford Metropolitan District Council (MDC). This should be reflected also in Table 2.1: SA Framework.	Support for the SA is noted with thanks. Propose to add 'Ecological and chemical status of surface waters as determined by the EA in line with Water Framework Directive requirements' as an indicator under SA Objective 6. The next stage of SA should include an update to the baseline, key sustainability issues and opportunities, and potential updates to the SA Framework.	Full scoping report update undertaken which includes consideration of water resources (including explicit reference to ecological and chemical status).
12	6935 29297 SA Report – SA Objective 6 Support	<u>SA Objective 6: Biodiversity & Geodiversity</u> You may also wish to consider an indicator that considers the km of rivers protected and enhanced via WFD and net gain ambitions. We would encourage this. An indicator should be included in relation to measurable biodiversity net gain and achieving 10% or more on developments in line with the emerging Environment Bill. Please also see our comments on biodiversity and water within the relevant polices in our other response letters.	Support for the SA is noted with thanks. Propose to add new indicators: 'Number of km of rivers that are protected and enhanced through the WFD' 'Number of developments achieving 10% biodiversity net gain'. The next stage of SA should include an update to the baseline, key sustainability issues and opportunities, and potential updates to the SA Framework.	Full scoping report update undertaken which includes consideration of water resources. IA framework has been amended and includes reference to biodiversity net gain. Indicators suggested are included in the proposed monitoring table.
13	6935 29301 SA Report – Appendix A Support	<u>Relevant Policies, Plans & Programmes - Appendix A 25 Year Environment Plan</u> We welcome the inclusion of DEFRA's 25 Year Environment Plan in Appendix-A (A17). The Local Plan policies should consider the emerging challenges and the key goals identified in the Government's 25 Year Environment Plan, including the need to improve air quality and tackle the climate emergency through	Support for the SA is noted with thanks. No comments on this representation. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		sustainable development, applying the biodiversity net gain principle and the use of nature- based solutions. It should be noted that the Government and DEFRA 25 Year Environment Plan highlights the need to reduce damaging abstraction, incentivise greater water efficiency and reduce personal use. It focuses on actions for water companies and states collaboration with industry will be required to determine appropriate targets for personal water consumption and the measures needed to achieve them, therefore there may be a change in the future regarding water efficiency standards for new housing. Given the aspirations in this plan you may wish to ensure local policy requires developers to meet the voluntary (higher efficiency) target. Water cycle studies can be used to identify what need there is for water efficiency. Specifically, for Water Quality and Water Resources, Bradford District Council should look to align with the ambition for 'Clean and plentiful water': "*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 warned of any short-term pollution risks*"		

No.	Respondent	Representation	Arcadis Response	AECOM Response
14	6935 29304 SA Report – Appendix A Support	Relevant Policies, Plans & Programmes - Appendix A EA Managing Water Abstraction In light of the above, we recommend including the Environment Agency's Managing Water Abstraction. Our Catchment Abstraction Management Strategy process assesses the availability of water resources for each river catchment, produces a strategy and feeds into investigations to identify failing water quality. See here: https://www.gov.uk/government/publications/managing-water-abstraction	Support for the SA is noted with thanks. Agree that the EA Managing Water Abstraction could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
15	6935 29309 SA Report – Appendix A Object	Relevant Policies, Plans & Programmes - Appendix A National Flood and Coastal Erosion Risk Management Strategy We also recommend that the reference to the National Flood and Coastal Erosion Risk Management Strategy, this was updated in 2020[1]. The Strategy has three core ambitions concerning future risk and investment needs: 1. Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change 2. Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure. 3. A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action.	Agree that the National Flood and Coastal Erosion Risk Management Strategy could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
16	6935 SA Report - Appendix A	Relevant Policies, Plans & Programmes - Appendix A Environment Bill We also recommend that reference should be made to the emerging Environment Bill that is due for royal ascent in the autumn 2021. The	Agree that the Environment Bill (now the Environment Act 2021) could be added to Appendix A. The next stage of SA should include an update to the PPP Review and	Full scoping report update undertaken.

[1] National Flood and Coastal Erosion Risk Management Strategy for England (2020) https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2

No.	Respondent	Representation	Arcadis Response	AECOM Response
		Government reintroduced the Environment Bill in January 2020 and this set out a requirement for development to achieve mandatory Biodiversity Net Gain (BNG). The Bill requires at least a 10% improvement in biodiversity value, which includes the riparian habitat. This approach follows on from the Government's aim in the 25 Year Environment Plan to "leave the environment in a better state than we found it". Paragraphs 170, 171,174 &175 of NPPF contain strengthened BNG policies for developing local planning policies and decision making. The paragraphs focus on enhancing the natural environment beyond simply protecting it. Paragraph 171 includes a requirement for Environmental Net Gain through enhancement of natural capital.	potential updates to the SA Framework.	
17	6935 29312 SA Report - Appendix A Support	Relevant Policies, Plans & Programmes - Appendix A Water Environment – Water Framework Directive We welcome the inclusion of the EU Water Framework Directive (2000/60/EC). With EU Exit, this Directive has now been transposed into law in England and Wales by The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. The Water Environment (WFD) establishes a legislative framework for the protection of surface waters (including rivers, lakes and coastal waters) and ground waters. The overall aims and objectives of the WFD are to: • enhance the status and prevent further deterioration of surface water bodies, ground water bodies and their ecosystems; • ensure progressive reduction of groundwater pollution; • reduce pollution of water, especially by priority substances and certain other pollutants, as set out in the list of • chemicals for Water Framework Directive assessments; • contribute to mitigating the effects of floods and droughts; • achieve at least good surface water status for all surface water bodies and good chemical status in ground water; • bodies or good ecological potential in the case of artificial or heavily modified water bodies; and • promote sustainable water use.	Support for the SA is noted with thanks. No comments on this representation. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		The Water Environment (WFD)(E&W) Regulations 2017 Part 6, paragraph 33 places a duty on each public body including local planning authorities to 'have regard to' River Basin Management Plans (RBMPs). We publish RBMPs that identify measures that will achieve WFD requirements for all water bodies in England and Wales. The purpose of a river basin management plan is to provide a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. The NPPF paragraph 170 (e) promotes the use of the River Basin Management Plan to enhance the environment. Local planning authorities have an important role when it comes to the Water Framework Directive - making sure new development does not cause deterioration and whenever possible supports measures to improve water bodies.		
18	6935 29313 SA Report - Appendix A Object	<u>Relevant Policies, Plans & Programmes - Appendix A</u> River Basin Management Plan We encourage more explicit inclusion and reference to the Humber River Basin Management Plan (RBMP), as a spate plan to be considered. The Humber RBMP sets out the state of the water environment within the Humber River Basin District and indicates where local government can support other regulators and operators in applying the relevant legislation and policy to improve the water environment. This is in the process of being updated, with a new plan due to be published in early 2022. We recommend that the objectives of WFD, where all waterbodies should reach good ecological status by 2027 or sooner, should be considered in the development of environmental planning policy to ensure that the riverine environment is incorporated in nature conservation. Additional information on WFD is provided within our Local Plan consultation responses, including a map of WFD status for ecological elements within the Yorkshire Dales (this currently only include Yorkshire detail, but we aim to provide the whole area in due course).	Agree that the Humber River Basin Management Plan could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		Further details and the RBMPs themselves can all be found here: https://www.gov.uk/government/collections/riverbasin-management-plans-2015		
19	6935 29315 SA Report – Appendix A Object	Relevant Policies, Plans & Programmes - Appendix A YW Water Resource Management Plan Yorkshire Water's Water Resource Management Plan (WRMP) (2019) and the upcoming Drainage and Wastewater Management Plan (due to be published in 2022) should also be recognised as long-term frameworks for the management of water to support sustainable growth in the region. Water companies have to produce WRMPs every five years to show how demand for water is going to be managed and met over a twenty-five year period. They assess in detail the pressures on future water supplies, including changes in demand and changes to the availability of water resources. WRMPs are therefore an essential evidence source for ascertaining water availability within an area. The WRMPs for the period 2020-25 are available from the Yorkshire Water[2] website.	Agree that the YW Water Resource Management Plan and Drainage and Wastewater Management Plan could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
20	6395 29316 SA Report - Appendix A Object	Relevant Policies, Plans & Programmes - Appendix A YW Water Resource Management Plan Yorkshire Water's Water Resource Management Plan (WRMP) (2019) and the upcoming Drainage and Wastewater Management Plan (due to be published in 2022) should also be recognised as long-term frameworks for the management of water to support sustainable growth in the region. Water companies have to produce WRMPs every five years to show how demand for water is going to be managed and met over a twenty-five year period. They assess in detail the pressures on future water supplies, including changes in demand and changes to the availability of water resources. WRMPs are therefore an essential evidence source for ascertaining water availability within an area. The WRMPs for the period 2020-25 are available from the Yorkshire Water website.	Agree that the YW Water Resource Management Plan and Drainage and Wastewater Management Plan could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.

[2] Yorkshire Water – Water Resource Management Plan 2019 https://www.yorkshirewater.com/resources/

No.	Respondent	Representation	Arcadis Response	AECOM Response
21	6935 29317 SA Report - Appendix A Object	Relevant Policies, Plans & Programmes - Appendix A EA Catchment Flood Risk Management Plans We recommend the inclusion of Environment Agency Catchment Flood Risk Management Plans. These provide an overview of the flood risk across the river catchments and recommended ways of managing the risk now and over the next 50 to 100 years. More details are here: https://www.gov.uk/government/collections/catchment-flood-management-plans	Agree that the EA Catchment Flood Risk Management Plans could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
22		Relevant Policies, Plans & Programmes - Appendix A Climate Change Act, 2008 The Climate Change Act should be included in the list of relevant legislation and frameworks. Chapter 14 of National Planning Policy Framework (NPPF) makes direct reference that local policy should support "radical reductions" (para 148) in emissions in line with the Climate Change Act 2008. This should be linked with the climate change objective.	Agree that the Climate Change Act 2008 could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
23		Relevant Policies, Plans & Programmes - Appendix A EU Framework Directive on Waste The Waste (England and Wales) Regulations 2011 implement the revised Waste Framework Directive. The Waste Management Plan for England sets out the Governments ambition for moving to a more sustainable and efficient approach to resource use and management. National Planning Policy for waste (NPPW) sets out detailed waste planning policies. It should be read in conjunction with the NPPF and the National Policy Statements for Wastewater and Hazardous Waste. Waste planning has a role to play in delivering objectives, including: reducing greenhouse gas emissions; better management of resources and protecting the environment; promoting treatment of waste further up the waste hierarchy; waste planning can also contribute to the development of the circular economy and associated sustainable growth.	Agree that the Waste Management Plan for England and the NPPW could be added to Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.

No.	Respondent	Representation	Arcadis Response	AECOM Response
24	6395 29318 SA Report - Appendix A Support	Relevant Policies, Plans & Programmes - Appendix A EU Ambient Air Quality and Management Directive / EU Directive on Assessment & Management of Environmental Noise Natural England should provide comments regarding air quality. There should be a consideration of air quality and the implications on sustainable objectives and the allocation of sites, especially those in air quality management areas (AQMAs). There are also implications on certain industrial uses that will require a permit from the EA or the Local Authority. Likewise, with the EU Directive on Assessment & Management of Environmental Noise. There is a need to consider the impact on wildlife and, including wildlife in watercourses. As highlighted in our consultation responses on the Local Plan, we encourage locations for potential new residential uses to be away from industry that creates noise or other pollution that may have an impact	Support for the SA is noted with thanks. No comments on this representation. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
25	6395 29320 SA Report - Appendix A Support	Relevant Policies, Plans & Programmes - Appendix A Flood and Water Management Act, 2010 We welcome the inclusion of the Flood and Water Management Act, 2010. This addresses the threats of flooding and water scarcity, including responsibilities for the EA and Lead Local Flood Authorities. Please note the following link regarding water management and planning: https://www.cisl.cam.ac.uk/businessaction/business-nature/natural-capital-impact-group/news/advice-water-management Also please note additional information CIRIA have released regarding guidance for delivering better water management through the planning system. This guidance can be found here: https://www.ciria.org/ItemDetail?iProductCode=C787F&Category=FREEPUBS	Consider information in links provided in next iteration of the SA Report. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
26	6395 29321 SA Report –	Relevant Policies, Plans & Programmes - Appendix A Biodiversity 2020 We welcome the inclusion of the Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services, Defra (2011). We would go a step further with the implications and recommend that proactive	Support for the SA is noted with thanks. No comments on this representation. The next stage of SA should include an update to the PPP Review and	Full scoping report update undertaken.

No.	Respondent	Representation	Arcadis Response	AECOM Response
	Appendix A Support	consideration is taken of biodiversity value in terms of when assessing potential site allocations. This does also include aquatic environments (rivers etc).	potential updates to the SA Framework.	
27		Groundwater Reference should be included to 'The Environment Agency's approach to groundwater protection' document and the included position statements. This should be a consideration in terms of assessing the local plan and potential site allocations in terms of groundwater. Any policy should not pose an unacceptable risk of pollution to controlled waters by mobilising potential contaminants in the ground. For example, policy involving SuDS.	Agree that 'The Environment Agency's approach to groundwater protection' is considered for inclusion in Appendix A. The next stage of SA should include an update to the PPP Review and potential updates to the SA Framework.	Full scoping report update undertaken.
28		Strategic Flood Risk Assessment An SFRA examines how sources of flooding may impact on development. This should be included as a key local document within the SA. We welcome continued working with you on this in the future. Further detail is set out elsewhere in our Local Plan response.	Agree that more information on the Strategic Flood Risk Assessment could be added to Appendix A as well as the key sustainability issues and opportunities. The next stage of SA should include an update to the PPP Review and potential updates to the key sustainability issues and opportunities, and the SA Framework.	Full scoping report update undertaken.
29		EU Exit We recommend you ensure that the correct references are made to all EU legislation that has now been transposed into UK (or England and Wales) law.	This will be checked in the next iteration of the SA Report. Referencing to be checked in the next iteration of the SA Report. All documents that are now irrelevant to be removed and the UK transpositions kept (where relevant).	Full scoping report update undertaken.
30	6850 (Agent: 846) 28165	The Sustainability Appraisal ('SA') includes assessments against the 19 sustainability objectives of the individual proposed allocations that collectively form Holme Wood South, as well as an overall assessment of the Holme Wood Sustainable Urban Extension (SUE) which covers both Holme Wood South and Holme Wood North. We	Support for the SA is noted with thanks. No comments on this representation. No action for the Council is required.	No action required.

No.	Respondent	Representation	Arcadis Response	AECOM Response
	Appendix E: Holme Wood SUE Support	welcome the analysis of the collective SUE as well as the individual site assessments. The individual site assessments against the SA criteria are similar to one another (with a few exceptions) and score positively against the majority of the socio-economic themed objectives and the location of the site in relation to transport links and accessibility to services and employment areas. The whole site is in Zone 1 Flood Risk.		
31	6850 (Agent: 846) 28169 Appendix E: Holme Wood SUE Object	The SUE receives a minor adverse effect against the Climate Change resilience objective (Objective 4), however individually, the Holme Wood South sites all score a minor positive effect against this objective. We disagree with the overall minor adverse effect which relates to the overall long-term impacts of greenfield land being replaced with built form and the potential effects on the local extent of surface water flood risk. Holme Wood South lies in Flood Zone 1, and the site's climate change resilience could be improved with the inclusion of Green Infrastructure, as illustrated on the Masterplan. The inclusion of SUDs and appropriate drainage strategies via comprehensive masterplanning will ensure that there is no increased surface water flood risk. The SUE score against this objective should be a minor positive.	The cumulative effect of the sites that make up Holmewood does lead to negative effects that is not borne out when the parcels are assessed individually. The entire site is greenfield. The incorporation of SuDS would have some benefit but not completely mitigate the effect. Information as set out in the masterplan is considered at this stage in the SA process. No action for the Council is required.	No further action required.
32	6850 (Agent: 846) 28170 Appendix E: Holme Wood SUE Object	The SUE receives a major adverse effect against the Cultural Heritage Objective (Objective 8), however the individual sites of Holme Wood South score a neutral effect for sites SE19/H and SE49/H and a minor adverse effect for sites SE46/H and SE47/H against this objective. There are no listed buildings within Holme Wood South. Reference to there being six Grade II Listed Buildings, each being historic farm buildings, as well as the Grade II* listed Ryecroft Hall is incorrect and refers to a larger site SE/100 which is not proposed in full in the Draft Local Plan. There are no listed buildings within the Holme Wood South sites. The scoring needs reassessing and marked neutral.	The assessment of SA objective 8: Cultural Heritage has been amended to reflect the three Grade II Listed Buildings situated within the developable area of the SUE and the score has been reflected to minor negative, see pg. 20/21 of Appendix E. No action required. Arcadis amended.	No further action required.
33	6850 (Agent: 846) 28171	We disagree with the SA scoring against Objective 10: Transport which is predicted a minor adverse effect. This is unduly negative, considering the proximity of Holme Wood South to existing bus stops along Westgate Hill Street, the existing and proposed connections into the existing Holme Wood estate, and the proposed bus route, as	The site is located 4.2km from Low Moor Station and 3km from Bradford Interchange Station at the nearest points. The SA methodology identifies	No action required. SUEs have not been reassessed individually, but have been considered proportionately through

No.	Respondent	Representation	Arcadis Response	AECOM Response
	Appendix E: Holme Wood SUE Object	indicated on the Masterplan. It is considered the score should be amended to a minor positive at least.	a negative effect if the site is over 2km of a train station. There are several bus stops within 400m of parts of the developable are of the SUE, although new residents to the east-side of the SUE would not be within 400m of existing bus stops. Although the masterplan proposes new bus stops, the detail of the masterplan will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. No action for the Council is required.	strategic options appraisal work.
34	6850 (Agent: 846) 30193 Appendix E: Holme Wood SUE Comment	We agree with the major positive scores awarded to the Housing, Accessible Services, Social Cohesion, Education, Employment and Economy objectives for the SUE (Objectives 11, 12, 13, 17, 18 and 19). However, we there is an error in the scoring of the individual site scores against the Education Objective for sites SE46/H, SE47/H and SE48/H which all incorrectly state that the nearest secondary school is Tong Leadership Academy, when in fact the nearest Secondary School is Tong High School, located to the immediate west of Holme Wood South as indicated on the Opportunities and Constraints Plan at Appendix 1. These scores need revisiting.	After online research, it seems Tong High School is the same school as Tong Leadership Academy. Tong Leadership Academy is located adjacent to the SUE's southern border. Holme Wood SUE was identified as major positive in relation to SA Objective 17 (Education). The assessment of the individual sites SE46, SE47 and SE48 have been considered separately and are not within the SUE area, and therefore, the scores do not need revisiting. No action for the Council is required.	No action required. SUEs have not been reassessed individually, but have been considered proportionately through strategic options appraisal work.

No.	Respondent	Representation	Arcadis Response	AECOM Response
35	7054 (Agent: 3763) 29962 Appendix E: Holme Wood SUE Object	SUE Assessments - Holme Wood / Sites at Holme Wood Chapter 6 of the Sustainability Appraisal (2021) is dedicated to assessing the SUE options. One of the sites assessed is that of the proposed Holme Wood SUE site (ref: SS/005). The Holme Wood SUE site encompasses the seven individual housing sites which make up the Holme Wood North and Holme Wood South sites, as depicted within Appendix F, focusing on the South Bradford Urban Area. Clearly the overarching assessment for the Holme Wood SUE site contradicts the assessment of the smaller individual sites.	The Holme Wood SUE appraisal leads of effects which do are borne out differently in the individual site appraisals. The SUE assessment considers the cumulative and synergistic effects of the development of the smaller sites which is not considered in the individual site parcel assessments. No action for the Council is required.	No action required. SUEs have not been reassessed individually, but have been considered proportionately through strategic options appraisal work.
36	7054 (Agent: 3763) 29963 Appendix E: Holme Wood SUE Object	SUE Assessments - Holme Wood / Sites at Holme Wood Reasonable Alternatives In line with NPPF and PPG guidance we note that BMDC have reviewed both the draft sites and reasonable alternatives for the SUEs, with a summary of assessments for reasonable alternatives shown at Appendix E. Yet Raikes Hall Farm, Holme Wood (SE/163) had been omitted as part of the SUE reasonable alternatives with no rationale. By ignoring Raikes Hall farm from the assessment of reasonable alternatives BMDC are not in accordance with the requirements of the NPPF and a point of legal procedure, in ensuring all reasonable alternatives are assessed. We have therefore provided a Savills Assessment for both sites incorporating all the SA objectives to enable a comparison between the two, in accordance with the NPP - it highlights that there is nothing to split the two sites apart. The assessment clearly highlights our client's land under SE/163 is a sustainable option with the added benefit over SS/005 of significant regeneration credentials to Holme Wood. The SUE should The SUE should therefore be reallocated and extended to include more growth at Holme Wood North and assessed on this basis. By comparing the two sites, as the above table has done, it highlights that there is nothing to split the two sites apart. The assessment clearly highlights our client's land under SE/163 is a sustainable	The SUEs and the parcels which form the SUEs have been provided to Arcadis by Bradford City Council. Each reasonable alternative parcel has been appraised separately. Site SE/163 has been appraised in Appendix F. Details on how the parcels within each SUE were identified to be clearly set out in the next iteration of the SA, included within commentary on Reasonable Alternatives.	No action required. SUEs have not been reassessed individually, but have been considered proportionately through strategic options appraisal work.

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		option with the added benefit over SS/005 of significant regeneration credentials to Holme Wood. The SUE should therefore be reallocated and extended to include more growth at Holme Wood North and assessed on this basis. Recommendation 7: Assess Holme Wood North SUE on the basis of additional growth at Ned Lane c. 2,000 units (with revised boundary under Appendix One) within the Sustainability Appraisal in the interests of NPPF compliance.		
37	4621 11482 Baildon Sites (BA1/H, BA2/H, BA4/H, BA5/H & BA6/H) Object	Summary: I would like to share my concerns regarding section 5.8.33. Here it is mentioned that the four Baildon primary schools are under capacity. By what extent? Detail is not provided. I would regard this as both an oversight and essential information considering the claimed major positive effect on the education SA objective for these proposed development areas. Ref to the assessments of sites BA1/H, BA2/H, BA4/H, BA5/H & BA6/H Full Text: Thank you for providing such a detailed document regarding the future planning of Baildon. I understand the need for additional housing and the difficulties in determining suitable sites. It is truly unfortunate timing to receive such a document whilst in the grip of the Covid pandemic as I believe this will have a wide ranging impact on the availability of brownfield sites in the medium term which may significantly improve the number of sites that Bradford Council could be in a position to consider for future housing developments. Overall I was very disappointed to read these proposals, particularly in relation to the lack of protection to the green belt, ancient woodland protected by TPO) and also the use of land which has a history of flooding. The council has shown a complete disregard to our green spaces. These ought to be protected without exception. I would like to share my concerns regarding section 5.8.33. Here it is mentioned that the four Baildon primary schools are under capacity. By what extent? Detail is not provided. I would regard this as both an oversight and essential information considering the claimed major	The SA Objectives are not intended to be combined and the identified effects are not intended to be considered ‘more important’ than another SA Objective. The assessment of the sites within Baildon does highlight the adverse effects of the proposed development on ancient woodland, in particular TPOs, and Green Belt land. The policies of the Local Plan seek to protect, and where appropriate, enhance the district’s green infrastructure network and seeks to identify opportunities to link areas of green space. Overall, the Plan policies would be expected to help mitigate the adverse effects of the proposed development on the natural environment. Policies of the Plan also seek to apply a sequential approach to directing development to areas of flood risk to help reduce the quantity of new development at risk of flooding. Site BA1/H is proposed for five dwellings but the major positive in terms of education is related to the site’s proximity to a primary and	Site assessments (which are policy off), and the effects of plan proposals (taking mitigation into account) are different matters. It is important to keep these separate. It would also be useful to understand capacity issues relating to schools and confirm whether new development will address any issues. Rationale for selecting preferred sites and discounting others should be provided in a site selection paper and summarised in the SA /IA Report.

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		positive effect on the education SA objective for these proposed development areas. I would like to make specific remarks to the following: BA1/H Stubbings Road I would like to object to this proposal. Whilst this site is in close proximity to local primary school provision, since there is a proposal to build five dwellings, I believe this "major positive effect" is insignificant in comparison to the destruction of 100% greenfield site, with its proximity to a Local Wildlife Site (LWS) which is also an area of Ancient Woodland (protected by TPO) and Priority Habitat. BA2/H West Lane (1), BA5/H Meadowside Road and BA6/H West Lane (2) I would like to object in the strongest possible terms to these sites being considered for development. Whilst I understand the pressure to develop land for housing, I believe that more brownfield sites will become available once the effects of the Covid pandemic have been fully realised. Also, the document states that these sites have the potential to deliver a major positive effect for residents on the education SA Objective. This is only the case if there is ample existing provision. Currently there is not. BA4/H Green Lane I have grave concerns regarding this proposal on the grounds of flooding. This area of Baildon frequently floods and I would urge the council to consider the wider implications. Development here could lead to worsening flood risk in particular if mature trees are damaged/removed. I respectfully request that these points be considered in light of any planning decisions.	secondary school, and the size of the site does not affect this score. No further comments in relation to Sites BA2/H, BA5/H and BA6/H. Site BA4/H has been identified as minor negative (-) for flood risk due to a small area of the site coinciding with Flood Zones 2 and 3a.	
38	7050 (Agent:846) 18417 Sites BA2/H & BA6/H	Regarding sites BA2/H and BA6/H The site-specific text summarises the Sustainability Appraisal assessment, which refers to the predicted effects of development. The scores against the objectives are identical for both sites.	Consideration of mitigation measures to improve biodiversity will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-	Reasonable alternatives have been appraised in a comparative way, with mitigation suggested as appropriate.

No.	Respondent	Representation	Arcadis Response	AECOM Response
	Object	Over half of the 17 objectives of these sites are given a positive score, these relate to climate change resilience, transport, housing, social cohesion, culture and leisure, health, education, employment and economy. The minor adverse effects relate to the range of natural environment themed objectives as a result of the proposed development taking place on greenfield and Green Belt land. A minor adverse effect is predicted against cultural heritage, which is discussed in detail below. A major adverse effect is predicted against the biodiversity and geodiversity objective, which we consider is negatively scored. There are significant opportunities to improve ecological connectivity at the site as well as provide new Green Infrastructure and significant new open space and landscape features. Existing trees are proposed to be retained. The opportunities here are not reflected in the negative SA scoring against objective 6, and should be revisited.	specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	
39	6985 (Agent: 846) 29514 Site KY1/H Object	The site-specific text summarises the Sustainability Appraisal assessment, which refers to the predicted effects including adverse effects relating to cultural heritage and positive effects for most socio-economic themed objectives and those relating to the location of the site in terms of proximity to transport links and services and facilities. It is recognised that there are heritage considerations with the development of this site, due to the proximity of the site to the setting of Whinburn Lodge and gardens, and yet the site is included as a preferred allocation. We are confident that any heritage constraint can be factored in to the design of a deliverable scheme. It is noted that the Council's Heritage Impact Statement for this site refers to the mitigation measures and opportunities to enhance the significance, which refers to strengthening the landscaped/ tree boundary along the north western and south-western boundaries of the site and retaining / rebuilding the dry-stone boundary walls.	Consideration of mitigation measures to improve cultural heritage will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	Reasonable alternatives have been appraised in a comparative way, with mitigation suggested as appropriate.
40	7003 (Agent: 846) 29544	The site has been assessed against 17 sustainability appraisal objectives, with the majority of the scores being positive (9 out of 17) relating in particular to most socio-economic themed objectives and the location of the site in relation to transport links, educational facilities and employment areas. The site is in Zone 1 Flood Risk. The site scores only a minor positive against contributing to satisfying	This site has not been assessed in the SA.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process.

No.	Respondent	Representation	Arcadis Response	AECOM Response
	Site KY/002 (Discounted Site) Object	Bradford's housing needs. It is considered that this is a major positive. A neutral score is awarded in the safe and secure objective. The site receives minor negative scores against 5 of the sustainability objectives and major negative scores against 2 objectives. We disagree with some of these scores as outlined below: • Land & Buildings: A major adverse effect is predicted against this objective due to the loss of greenfield land. A large number of preferred sites in the District are greenfield. • Water Resources: The development of the site would result in a minor increase in water consumption. This applies to all development. • Biodiversity and geodiversity: New development could reduce biodiversity value and reduce local ecological connectivity. It is considered that the site provides a significant opportunity to enhance biodiversity value, with the provision of significant open space and additional landscape, particularly given the proposed "no development" zone on a third of the site to account for heritage impact. The site therefore has the potential for a minor positive or neutral score. • Landscape & Townscape: The SA states that the development of this site would "be likely to adversely alter the local townscape and landscape character" and concludes that "a minor adverse effect on the local landscape and townscape cannot be ruled out". The development provides the opportunity to incorporate additional planting and landscaping buffers, resulting in a positive townscape and landscape impact. The score is negatively weighted. • Cultural Heritage: The site is scored a major adverse effect against this objective. The Council's own evidence concludes that two thirds of the site would have an acceptable, less than substantial harm, and the third adjacent to Whinburn Registered Park/Garden would result in substantial harm. Careful, appropriate design and the inclusion of a "no development" zone is capable of resulting in a neutral effect on cultural heritage. The SA scoring doesn't take account for this scenario. • Air quality: It appears that all development receives a minor adverse impact against this objective due to the increase in air		

No.	Respondent	Representation	Arcadis Response	AECOM Response
		pollution in relation to existing levels due to pollution associated with homes and transport movements. The site is not in an AQMA or CAZ. • Accessible services: The site scores a minor negative due to the proximity of the site to access a range of local shops and services. The site is however accessible by public transport to numerous services.		
41	6984 (Agent: 846) 29550 Site KY/002 (Discounted Site) Object	The site has been assessed against 17 sustainability appraisal objectives, with the majority of the scores being positive (9 out of 17) relating in particular to most socio-economic themed objectives and the location of the site in relation to transport links, educational facilities and employment areas. The site is in Zone 1 Flood Risk. The site scores only a minor positive against contributing to satisfying Bradford's housing needs. It is considered that this is a major positive. A neutral score is awarded in the safe and secure objective. The site receives minor negative scores against 5 of the sustainability objectives and major negative scores against 2 objectives. We disagree with some of these scores as outlined below: • Land & Buildings: A major adverse effect is predicted against this objective due to the loss of greenfield land. A large number of preferred sites in the District are greenfield. • Water Resources: The development of the site would result in a minor increase in water consumption. This applies to all development. • Biodiversity and geodiversity: New development could reduce biodiversity value and reduce local ecological connectivity. It is considered that the site provides a significant opportunity to enhance biodiversity value, with the provision of significant open space and additional landscape, particularly given the proposed "no development" zone on a third of the site to account for heritage impact. The site therefore has the potential for a minor positive or neutral score. • Landscape & Townscape: The SA states that the development of this site would "be likely to adversely alter the local townscape and landscape character" and concludes that "a minor adverse effect on the local landscape and townscape cannot be ruled out". The development provides the opportunity to incorporate	This site has not been assessed in the SA.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		additional planting and landscaping buffers, resulting in a positive townscape and landscape impact. The score is negatively weighted. • Cultural Heritage: The site is scored a major adverse effect against this objective. The Council's own evidence concludes that two thirds of the site would have an acceptable, less than substantial harm, and the third adjacent to Whinburn Registered Park/Garden would result in substantial harm. Careful, appropriate design and the inclusion of a "no development" zone is capable of resulting in a neutral effect on cultural heritage. The SA scoring doesn't take account for this scenario. • Air quality: It appears that all development receives a minor adverse impact against this objective due to the increase in air pollution in relation to existing levels due to pollution associated with homes and transport movements. The site is not in an AQMA or CAZ. • Accessible services: The site scores a minor negative due to the proximity of the site to access a range of local shops and services. The site is however accessible by public transport to numerous services.		
42	5708 (Agent: 608) 29857 Site BI3/H Object	Comment is provided below on the sustainability objectives against which the site may have been inaccurately or harshly assessed. No comment is made with respect to sustainability objectives 3 (Land & buildings), 4 (Climate change resilience), 5 (Water resources), 7 (Landscape & townscape), 9 (Air quality), 11 (Housing), 13 (Social cohesion), 14 (Culture and leisure), 15 (Safe & secure), 16 (Health), 18 (Employment) and 19 (Economy). Many of these assessments are positive and/or appear to be reasonable. Objective 6 - Biodiversity & geodiversity The site is assessed as - - (major negative) against this sustainability objective. However, the assessment is presumptuous and maybe overly pessimistic. Some of the site is planted with Norway Spruce and Scots Pine trees, which were planted as crops around 20 years ago and are harvested from time-to-time. It is believed that the site's ecological value is low and could be maintained or enhanced by compensatory planting of native trees and shrubs that are known to support biodiversity and	The SA appraises the sites in a 'worse-case' scenario to ensure that the SA assessment does not 'greenwash' (the precautionary principle). Consideration of mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be	Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		which would help to maintain ecological connectivity. Furthermore, my Client also owns the land edged blue on the plan attached as appendix 2, which could be made available for off-site ecological enhancement proposals, such as a new semi-natural waterbody. The existence of protected trees and woodland to the east is noted. However, these areas do not include public rights of way and are not publicly accessible. The likelihood of harm arising from the development of BI3/H is negligible. At worst, the site should be assessed as - (minor negative) against this objective. However, there is scope for a neutral or even positive impact upon biodiversity, a matter that will be addressed by the forthcoming pre-application enquiry. Objection 8 - Cultural Heritage The site is assessed as - (minor negative) against this sustainability objective as there is said to be potential for a “minor adverse alteration” to the setting of Greenhill Crag, which is a grade II listed building, located around 50m to the north east. However, a strong degree of physical and visual separation is provided between the listed building and development site by a belt of coniferous woodland that my Client intends to retain and enrich. Subject to this the listed building will continue to benefit from a high quality rural setting and there will be a neutral or negligible impact upon its setting and special interest, as confirmed by the Heritage Impact Assessment attached as appendix 3. The site should be assessed as O (neutral/ negligible).	considered at the next stage of SA during detailed appraisal.	
43	5708 (Agent: 608) 29858 Site BI3/H Object	Comment is provided below on the sustainability objectives against which the site may have been inaccurately or harshly assessed. No comment is made with respect to sustainability objectives 3 (Land & buildings), 4 (Climate change resilience), 5 (Water resources), 7 (Landscape & townscape), 9 (Air quality), 11 (Housing), 13 (Social cohesion), 14 (Culture and leisure), 15 (Safe & secure), 16 (Health), 18 (Employment) and 19 (Economy). Many of these assessments are positive and/or appear to be reasonable. Objective 12 - Accessible Services	‘Accessible Services’ is the short title for ‘SA Objective 12: To improve the quality and range of services available within communities and connections to wider social, environmental and economic networks’. Page 29 of the Interim SA. Report sets out how the questions ‘How accessible are key services,	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. It is also worth noting that there have been changes to site boundaries and the status of sites. The Council’s site

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		The site is assessed as - (minor negative) against this sustainability objective. However, within the SA I have been unable to find the definition of “accessible services” or “key services, amenities and or facilities”, which must be within 600m of the site to achieve a positive assessment. Nearby facilities include Lady Lane Park School that is within 300m of the site, and Oakwood Hall Hotel, which includes a publicly accessible bar and restaurant, is just over 300m from the site. It is suggested that these are key services, amenities and facilities that justify a – (minor positive) assessment. Objection 17 - Education The site is erroneously assessed as - (minor negative) against this sustainability objective. It is located within 300m of Lady Lane Park School, which provides infant and junior education, and just over 1km from Bingley Grammar School, which provides secondary education (Beckfoot School is not the nearest secondary school). It is believed that both schools have some capacity for new students and the site should therefore be assessed as ++ (major positive).	amenities and facilities for site users?’ is scored in the SA. The ‘Oakwood Hall Hotel, which includes a publicly accessible bar and restaurant’ is not classed as an accessible service, and therefore, the SA scores do not need to be altered. Lady Lane Park School is a prep school and therefore is not accessible for all local residents, and therefore, is not considered as a part of the education assessment. Bingley Grammar School is also not considered in the assessment, as a grammar school is not accessible for all students. No action for the Council is required.	selection paper allows sites to be tracked across the whole plan-making process.
44	5710 (Agent: 608) 29869 Site: KY36/H Support	Overall, the SA is positive, and this is welcomed.	Comment noted, with thanks. No comments on this representation. No action for the Council is required.	No action required.
45	5710 (Agent: 608) 29870 Site: KY36/H Object	Regarding surface water flooding, a deliberate gap has been left between two land drains to create a drinking pool for cows, which can be easily made good by reconnecting the pipes. My Clients, who have owned the land for decades, have never witnessed any surface water flooding attributable to run-off. It is anticipated that any surface water flood risk could be addressed by a competent Engineer and Architect. Measures might include avoiding the construction of buildings on the parts of the site at the highest theoretical risk of surface water flooding and raising floor and/or land levels.	The site has been appraised as major negative for SA Objective 4: climate change resilience as a band of low, medium and high surface water flood risk runs through the centre of the site which would likely be difficult to avoid given the site’s relatively small size. We note the respondents’ comments. The SA appraises the sites in a ‘worse-case’ scenario to ensure that the SA assessment does not ‘greenwash’.	Agree. All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Furthermore, site appraisals only identify broad constraints and opportunities and do not determine significance of

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			Consideration of mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	effects as a definite outcome.
46	7045 (Agent: 608) 29888 Site: KY36/H Support	Overall, the SA is positive, and this is welcomed.	Comment noted, with thanks. No comments on this representation. No action for the Council is required.	Agree.
47	7045 (Agent: 608) 29889 Site: KY36/H Object	Regarding surface water flooding, a deliberate gap has been left between two land drains to create a drinking pool for cows, which can be easily made good by reconnecting the pipes. My Clients, who have owned the land for decades, have never witnessed any surface water flooding attributable to run-off. It is anticipated that any surface water flood risk could be addressed by a competent Engineer and Architect. Measures might include avoiding the construction of buildings on the parts of the site at the highest theoretical risk of surface water flooding and raising floor and/or land levels.	Same comment as response number 5710 (Agent: 608) 29870. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	Be clear that the Council has taken the potential for mitigation into consideration when making decisions about preferred and discounted sites (despite this not being explicitly covered by the site assessment process in the SA at Reg19 stage).
49	7051 (Agent: 845)	The site-specific text summarises the Sustainability Appraisal assessment, which refers to the predicted effects of development. The scores against the objectives are identical for both sites. Over half of the 17 objectives of these sites are given a positive score,	Consideration of mitigation measures to improve biodiversity will be considered later in the SA process to ensure that the assessment of	Agree.

No.	Respondent	Representation	Arcadis Response	AECOM Response
	29916 Sites BA2/H & BA6/H	these relate to climate change resilience, transport, housing, social cohesion, culture and leisure, health, education, employment and economy. The minor adverse effects relate to the range of natural environment themed objectives as a result of the proposed development taking place on greenfield and Green Belt land. A minor adverse effect is predicted against cultural heritage, which is discussed in detail below. A major adverse effect is predicted against the biodiversity and geodiversity objective, which we consider is negatively scored. There are significant opportunities to improve ecological connectivity at the site as well as provide new Green Infrastructure and significant new open space and landscape features. Existing trees are proposed to be retained. The opportunities here are not reflected in the negative SA scoring against objective 6, and should be revisited.	reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	
50	536 30147 Site EM/005 (Alternative Site) Object	<u>The sustainability appraisal of site EM/005</u> Given the description of the site and the summary assessment it appears that the larger site containing the southern residential curtilage and buildings has been included. This mistake needs to be rectified and a site sustainability re-assessment carried out. Many documents have been provided and were covered in the formal pre-app assessment referred to in this response. It does not appear that these have been fully taken into account. <u>Comments in relation to specific sustainability criteria used</u> Criterion 3 Land and Buildings – the site has a better rating than the preferred allocation site- EM/007. Criterion 4 Climate Change resilience - It is not clear why this site is rated green pink- and the preferred site green+ when both are in FZ1 and there is only a very small area of differential which may be in the southern section of the site which should not have been included. Criterion 6 Biodiversity and Geodiversity - Account needs to be taken of the proposals for the outline biodiversity, recreation and other environmental improvements which are proposed for this site and which are wholly capable of being accommodated on site. This does not apply to site EM/007.	Consideration of mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. In relation to SA Objective 4: Climate Change, a minor negative score has been awarded for site EM/005 as part of the site is within an area of high risk surface water flooding, and development could lead to an increase in impermeable surfaces compared to existing levels. No comments on how the scores of this site compared to Site EM/007.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. There is still a need to be proportionate and fair when considering the potential for site mitigation and this underpins additional appraisals undertaken post Regulation 18 consultation..

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		Criterion 7 Landscape and Townscape - Landscape improvements have been discussed with officers at the pre-app meeting and are included in submissions. There is full potential to improve the current landscape as well as accommodating the proposed level of development, subject to detailed site planning and negotiations. Criterion 10 Transport - Cliff Delph scores better than the preferred site. Criterion 12 Accessible Services - the Cliff Delph site is marginally preferable to the preferred allocation. Criterion 17 Education - Cliff Delph again scores better on access to schools. Based on this rational comparison of performance the Cliff Delph site EM/005 is preferable to the much smaller selected allocation site EM/007.	Council to determine if the correct site boundary was used in the SA (see end of document). Can the Council give a reason as to why Site EM/005 was not chosen for allocation over Site EM/007? Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	
51	6850 (Agent: 846) Site NW9/H 28239 Object	Site NW9/H has been individually assessed in the Sustainability Appraisal against the 17 sustainability appraisal objectives, with 9 of the scores being positive, relating in particular to most socio-economic themed objectives and the location of the site in relation to education, employment and health. We disagree with the major adverse scoring of the site against the biodiversity and geodiversity criteria (SA Objective 6), which refers to a reduction in biodiversity value and local ecological connectivity. Design considerations including and appropriate green space, additional landscaping and habitat creation could improve and enhance biodiversity value and retain ecological connectivity. The scoring should be amended to a neutral effect.	Site NW9/H has been assessed as major negative in relation to biodiversity due to the HRA being unable to rule out likely significant effects on the South Pennine Moors SPA/SAC. Consideration of mitigation measures to improve biodiversity will be considered later in the plan making and SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred sites including relevant mitigation to be	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report.

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			considered at the next stage of SA during detailed appraisal.	
52	6850 (Agent: 846) Site NW10/H & NW/024 (SUE Site /Rejected Site) 28307 Object	Both Site NW10/H and the whole extent of NW/024 have been individually assessed in the Sustainability Appraisal against the 17 sustainability appraisal objectives. The sites score almost identically against the criteria, with the exception of 3 criteria as explained below • Water Resources: The larger site NW/024 receives a major adverse effect against Criteria 5 – Water Resources, whereas Site NW10/H receives a minor positive score. We disagree with the major adverse score. The difference appears to relate to the presence of waterbodies within the site boundary of NW/024. This however should not result in an adverse rating. The existing pond located in the south west part of the site is not a constraint to development and provides an opportunity to retain and include as part of the green infrastructure strategy that provides a habitat rich environment. As identified on the Masterplan, this can be incorporated into SUDs and swale features within the site. It is considered the score should be amended to a minor positive in alignment with NW10/H. • Biodiversity and geodiversity: Site NW10/H receives a major adverse score, whereas NW/024 receives a minor adverse score against this objective. We disagree with both scores. Both sites provide an opportunity to enhance biodiversity value, with the provision of open space, green infrastructure and additional landscaping. It is considered that the score should be amended to a neutral score for both sites. • Housing: Given the size of NW/024 and the development scale, Site NW/024 receives a major positive score against this criteria compared with NW10/H minor positive score. A large proportion of the scores for both NW10/H and the wider site NW/024 are positive (8 and 9 out of 17) relating in particular to most socio-economic themed objectives and the location of the site in relation to transport links and accessibility to services and employment areas. The whole site is in Zone 1 Flood Risk.	Due to the size of the SUE (larger site) compared to the smaller, the adverse effects from development at the larger site would be more significant. The assessment criteria establish that the presence of a waterbody would lead to the greater potential for water pollution as a direct result of development. Long term mitigation measures are not included with this score. The SUEs were not screened in the HRA assessment, however, the smaller parcels which make up each SUE were. Therefore, we have amended the assessment and a major negative score has been awarded to all SUEs where an individual site parcel was screened in by the HRA. Further HRA work is required to screen out these sites. The larger site is scored more positively for housing as it is proposed for more houses than the smaller site. Consideration of further mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would	Further SA work focused on ‘packages’ of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.

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			require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	
53	6942 (Agent: 6842) Site SH/044 (Rejected Site) 28514 Object	Of concern is the Council's Sustainability Appraisal, which has been prepared by Arcadis, which undertakes an assessment of all sites which have been put forward through the SHLAA process whether they are proposed allocations or rejected sites. However, no assessment of our Clients site in Nab Wood (SH/044) has been undertaken and as such, the Council have not fully assessed all potential alternatives.	The SA has appraised all reasonable alternative sites identified by the Council.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report.
54	6993 Site SH4/H 29503 Object	In Bradford Council's Sustainability Appraisal element of the Core Strategy Partial Review Scoping Report (January 2019) it states that 'Physcial [sic] 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.' [pg 13] As this site is situated mid-way down a sloping hill, the houses directly above it (to the south) will have their view significantly impacted as will those whose houses are directly adjacent to the site. This is aesthetically damaging and might also impact on mental wellbeing as a relatively quiet area becomes significantly busier and noisier. Again, in Bradford Council's Sustainability Appraisal element of the Core Strategy Partial Review Scoping Report (January 2019) there is a statement, '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	Site SH/026 has been assessed as minor negative in relation to landscape due to loss of GI and adverse effects on visual amenity. No action for the Council is required.	Agree. All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.

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		character assessment to make decisions about the location and design of new development.' [pg14] One neighbour referred to this development as taking the 'Wood' out of Nab 'Wood'. The same document makes this commitment, 'Local Plan policy framework should ensure the protection, conservation and enhancement of biodiversity in line with the UK Biodiversity Action Plan.' [pg 55] It can be argued that the proposed plans for Green Belt Land are not aligned to this commitment.		
55	6340 Site SH3/H 29590 Object	The Sustainability Appraisal for SH3 is vague, unbalanced, incomplete and is not substantiated with any reference to the Council's extensive documentation on the importance and protection of Open Space.	The SA identified a minor negative effect in relation to SA Objective 7: Landscape as the proposed development would result in a loss of open greenfield containing green infrastructure of potentially high visual amenity, which would alter the local townscape and landscape character. The SA has therefore sought to highlight the effects of the proposed development in this open space. No action for the Council is required.	No action needed.
56	7038 (Agent: 608) Site SH4/H 29862 Support	Site SH4/H (SLA Ref SH/026) Recognition of the site's sustainable location, in proximity to educational and other facilities is welcomed, as are the minor positive impacts predicted for climate change resilience, housing, social cohesion, culture and leisure, health, employment and economy.	Support for the SA is noted, with thanks. No comments on this representation. No action for the Council is required.	Noted. No further actions required.
57	7038 (Agent: 608) Site SH4/H 29863 Object	<u>Site SH4/H (SLA Ref SH/026)</u> <u>Climate change resilience</u> The site is assessed as + (minor positive) against this Sustainability Appraisal (SA) objective, but it should be assessed as ++ (major positive) as there will be low surface water run-off, plus the	Consideration of further mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report.

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		incorporation of green infrastructure within the development, potentially including a SUDS basin. Water resources The site is assessed as - (minor negative) against this SA objective as it could pose a risk to nearby water bodies and will result in a minor increase in water consumption. The latter is unavoidable and agreed but the former is clearly a risk that can be managed. Furthermore, the presence of nearby water courses provides opportunities for the creation of SUDS basins and the sustainable disposal of surface water, without placing additional demands on public sewers. As the developer is investigating the feasibility of a SUDS basin (in-line with the submitted pre-application enquiry), thus providing a new semi-natural waterbody, the site should be assessed as + (minor positive) or at least +/- (neutral) on the whole.	to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.
58	7038 (Agent: 608) Site SH4/H 29864 Object	Site SH4/H (SLA Ref SH/026) Biodiversity & geodiversity The site is assessed as - - (major negative) against this sustainability objective. However, the assessment is presumptuous and overly pessimistic, without good reason. In-line with the pre-application inquiry submitted, protected trees and woodland on-site will be protected and retained, and the Developer will be working with BI Ecology (letter attached as appendix 2) with the aim of achieving net gains for biodiversity and green infrastructure, in-line with the NPPF. As the site is within 7km of the South Pennine Moors SPA/SCA, it is acknowledged that Habitat Regulations Assessment must be undertaken but the potential for significant effects is very low. At worst, the site should be assessed as +/- (neutral) on the whole. Landscape & townscape The site is assessed as - (minor negative) against this sustainability objective. The development would inevitably result in the loss of open land. However, development of the site would not result in the loss of any protected trees or woodland. It is agreed that the relationship of	Consideration of further mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.

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		the site with existing built form, limits magnitude of potential effects on the landscape. The Design Team have not identified any long views upon which there will be significant negative effects and will be working with PWP Design (Landscape Architects) (letter attached as appendix 3) to ensure good design and appropriate mitigation.		
59	7038 (Agent: 608) Site SH4/H 29865 Object	Site SH4/H (SLA Ref SH/026) Cultural heritage The site is assessed as - (minor negative) against this sustainability objective due to its proximity to New Close Farm (grade II listed) and a barn to the east (grade II* listed) and a likely adverse impact upon their settings. It is agreed that there is potential for an adverse impact upon the settings of these buildings, however, such an impact is not inevitable and can be avoided by good design and mitigation, including planting and a green buffer. It is suggested that the site should be assessed as +/- (neutral), subject to mitigation. Air quality The site is assessed as - - (major negative) against this sustainability objective. It is accepted that new development will inevitably result in some additional vehicle movements and emissions. However, impacts can and will be mitigated by electric vehicle charging points and measures such as a Travel Plan that encourage the uptake of sustainable transport options. It is suggested the site should be assessed as - (minor negative).	Consideration of further mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Detailed appraisal of preferred site including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.
60	7060 (Agent: 5381) Site: WI2/H 16348 Object	Site WI2/H With respect to the SA and noted potential impacts arising from development, the assessment should be corrected to the following: (see attached document for details) Land and Buildings - The Site's lower Agricultural Land Classification grade should be accounted for alongside the loss of Greenfield site, giving this a Minor Negative score as opposed to Major. Climate Change and Resilience - disagree with the major negative score due to small areas of surface water flooding - this does not account of SUDs drainage.	Table 3-3 sets out the assessment methodology which states that for SA Objective 3 a minor positive would be awarded if the site is ALC Grade 4, however, the site is large (1.47ha) and is existing greenfield land and would result in a major negative score. Consideration of mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable	Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.

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		Biodiversity and Geodiversity - SPD1, however, confirms that the Site is of low ecological value. Landscape and Townscape - A Minor Negative score is given, however SPD1 confirms that there would only be minor/negligible levels of change due to surrounding vegetation/landscape Cultural Heritage - A Minor Negative effect on the two Grade II Listed Buildings over 220m north is noted. This is highly unlikely as the Site is screened by existing development and landscape and would be viewed at distance.	alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. SA Objective 7: Landscape and Townscape has been identified as minor negative due to the potential loss of open greenfield and Green Belt land that contains GI elements of potentially high visual amenity, in line with the SA methodology. No change to Cultural Heritage score. A precautionary approach has been used. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	
61	536 Site: TH/013 (Alternative Site) 30149 Object	The site specific SA concludes that "development at this site would be unlikely to result in a significant effect, either positive or negative, on any SA objective. I disagree with the assessment against criterion 3 - Land and Buildings as the loss of a relative small area of greenfield land does not justify a major adverse impact rating. We propose off-site environmental improvement contributions in the form of landscaping and other positive environmental changes towards the enhancement of Thornton Recreation Ground as a small improved parkland. This would make a contribution to the current deficit of parks and gardens space in the village of -5.24 hectares. These will require local consultation and discussion with the Council.	Table 3-3 sets out the assessment methodology which states that for SA Objective 3 a major negative score would be awarded if the site is large (this site is 2.31ha) and is existing greenfield land. Consideration of mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would	Agree with Arcadis. No further action required at this stage.

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			require the least amount of mitigation. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	
62	536 Site: TH/013 (Alternative Site) 30150 Object	The site specific SA concludes that "development at this site would be unlikely to result in a significant effect, either positive or negative, on any SA objective. I disagree with the assessment against criterion 3 - Land and Buildings as the loss of a relative small area of greenfield land does not justify a major adverse impact rating. We propose off-site environmental improvement contributions in the form of landscaping and other positive environmental changes towards the enhancement of Thornton Recreation Ground as a small improved parkland. This would make a contribution to the current deficit of parks and gardens space in the village of -5.24 hectares. These will require local consultation and discussion with the Council.	Same comment as above. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.
63	7047 (Agent: 846) Site: SE/126 (Alternative Site/Rejected Site) 18408 Object	The site has been assessed against the Council's 17 sustainability appraisal objectives. The Sustainability Appraisal 'status' of SE/126 refers to the site as 'Alternative.' It is not clear what the meaning of 'alternative' is in this context. Given that the Draft Local Plan falls significantly short of meeting the identified housing requirement, due to the lack of inclusion of a 35% uplift, The Local Plan needs to identify a significant amount of additional sites. Site SE/126 is a suitable 'alternative' site that should be identified and included as an allocation. The scoring of SE/126 against the SA objectives includes the majority of positive scores, including major positive effects against the social cohesion, health, and education objectives. In particular, the site	The use of the term 'alternative' does not necessarily mean that the Council will not allocate the site, and therefore that is why it is being considered as assessed through this process. No further action for the Council is required.	Agree with Arcadis. However, note that further stages of assessment may involve re-consideration of sites that have been discounted at draft Plan stage (for example as packages of sites that are part of strategic reasonable alternatives exploring different scales of growth.).

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		scores positively against the socio-economic themed objectives and the location of the site in relation to transport links, educational facilities and employment areas. This is reflective of the accessibility of the site to numerous services and facilities, as well as the proximity of the site to a bus priority corridor (A641). Additional detail of the sustainability and accessibility of the site is contained in the Promotion Document enclosed at Appendix 1.		
64	6850 (Agent: 846) Site: SE47/E 28172 Object	We disagree with the major adverse effect against the Water Resources objective (Objective 5) for Site SE47/H. The site is scored negatively due to the 'presence of a waterbody', which is the watercourse that traverses the site. This should not result in an adverse rating. The existing watercourse has been incorporated into the Masterplan, as part of the green infrastructure strategy, that provides a habitat rich environment. This should be seen as a positive effect or neutral.	Consideration of mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. The presence of a waterbody could lead to an increased risk of pollution from a wide variety of sources including from an increase in surface water run off and presence of polluting uses such as traffic, dwellings, and recreational activities such as dog walking. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.
65	6850 (Agent: 846) Site: SE46/H, SE47/H & SE48/H 28173	We agree with the major positive scores awarded to the Housing, Accessible Services, Social Cohesion, Education, Employment and Economy objectives for the SUE (Objectives 11, 12, 13, 17, 18 and 19). However, we there is an error in the scoring of the individual site scores against the Education Objective for sites SE46/H, SE47/H and SE48/H which all incorrectly state that the nearest secondary school is Tong Leadership Academy, when in fact the nearest Secondary School is Tong High School, located to the immediate west of Holme	After online research, it seems Tong High School is the same school as Tong Leadership Academy. The nearest of these three sites is Site SE/046 which is 1.6km north of the school. No score change is required.	No action required.

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	Object	Wood South as indicated on the Opportunities and Constraints Plan at Appendix 1. These scores need revisiting.	No further action for the Council is required.	
66	1611 1736 Site: Ilkley Summary Object	Having read the Apparel & Assessment with regards to Ilkley, I'm concerned that the listed positive impacts (transport, education, accessibility) are deemed 'minor'; whereas the negative impacts are all 'significant', and all sites have been scored 'major negative' for geodiversity and biodiversity. This reads to me as very little positive effect for significant negative detriment. I have read and can appreciate the Council have tried to avoid the use of Green Belt in the main instance but would implore them to reconsider the sites if, by their own assessment, there is little to be achieved in using these sites, other than meeting a target number. As a resident, it's extremely worrying to think we will be potentially worsening our climate change resilience, cultural heritage & land and buildings for this minor gain.	The summary text highlights the significant negative effects identified for each site to emphasise the issues that need to be considered in Ilkley as a priority, and therefore, the summary may seem to be overly negative, rather than highlighting the positive effects. Considering the summary table of scores, it can be seen that a range of positive and negative effects has been identified for each site. Consideration of mitigation measures will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. No further action for the Council is required.	Issue is with the site selection rather than SA process. All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report.
67	5502 16996 Site: IL1/H to IL4/H Object	The headline conclusion is “A major adverse effect is predicted on the land and buildings SA Objective due to the loss of greenfield land.” Surely, on this criterion alone, the site must be deemed unsustainable. A second major adverse effect is acknowledged on biodiversity and geodiversity There are no major positive effects noted.	The SA methodology states that a site which would result in loss of >0.4ha greenfield land would score major negatively against SA Objective 3: Land and Buildings. Site IL1/H is a 7.18ha greenfield site and therefore a major negative effect has been identified.	No action required.

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		The cultural heritage objective assessment appears to totally ignore the historical significance of the site Even though the majority of the resources listed (e.g. shops, pubs, healthcare) are beyond walking distance from the site, all are deemed to have “minor positive” influence on sustainability. Schools are acknowledged as a “minor negative” presumably because of distance, yet apart from employment, schools generate more journeys than all other venues. The employment section suggests that “Residents at the site would have excellent access to the diverse range of employment opportunities in the centre of Ilkley”. In fact, most residents of the town would be likely to head straight for Leeds. Employment opportunities in Ilkley are few and far between.	IL2/H is identified a minor negative for Cultural Heritage due to being located approximately 45m from the Grad II Listed ‘Hollin Hall Farm House’. IK3/H is also identified as minor negative in relation to Cultural Heritage due to its close proximity to four Grade II Listed Buildings to the north of the site. IL4/H is identified a major negative for Cultural Heritage due to its close proximity to the Old Bridge Scheduled Monument and coinciding with the Ilkley Conservation Area. A neutral impact has been awarded to site IL1/H as the site is screened from nearby heritage assets by existing buildings or vegetation. Respondent’s statement about a minor positive score being awarded for access to services is incorrect, as SA Objective 12: Accessible Services is scores as minor negative and states “access to services and amenities is limited, residents would need to travel up to 2km west into the centre of Ilkley to access services and amenities to satisfy their daily needs”. No further comment on identified education or employment scores. No further action for the Council is required.	

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68	5738 (Agent: 846) 18409 Site: AD1/H Support	The site-specific text summarises the Sustainability Appraisal assessment, which refers to the predicted effects of development, summarising that the development of this site would be unlikely to result in a significant effect, either positive or negative on any SA objective. We do not disagree with this summary. Whilst the site scores minor adverse effects against SA Objectives 12 and 17 in relation to accessibility to services and education, the distances of 1.4km to Addingham services and 1.4km to Addingham Primary School are still considered acceptable distances. The site is well located to the bus network, with bus stops located within 400m to the east of the site on Moor Park Drive. The site (as referenced in the AMA Highways Report) is considered to be located in a sustainable and easily accessible location on foot or by bicycle, with the entirety of Addingham falling within an acceptable 2km walking catchment of the site.	The proposed development at Site AD1/H could lead to significant adverse effects in relation to land & buildings and biodiversity & geodiversity. The distance from the site to education and services/facilities is outside of the distances set out in the methodology (80m from a primary school and 600m from key services/ facilities). The methodology also states that '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' would be minor positive in terms of public transport accessibility. No further action for the Council is required.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.
69	6123 21062 Site: IL1/H & IL3/H Object	While I recognise the need for housing and have no argument with the two smaller proposed locations in Ilkley, my view is that large developments such as those discussed below are incompatible with retaining the open, village-like nature of the town (and of retaining any semblance of proper green belt). With regard to IL1/H - Ben Rhydding Drive, Wheatley Grove: the SA section itself appears not to have picked up that around 10% of the site is currently covered by protected trees, which would be destroyed as part of any development (this is mentioned in passing under Constraints and Opportunities; Development Considerations talks about increasing tree cover while building 130 houses on the site, which is highly misleading). I am also surprised that the impact on Green Belt has been categorised as Moderate, and would be very	Site IL1/H has been identified as minor negative in relation to landscape & townscape as "residential development at this site could result in the loss of open greenfield and Green Belt land that contains GI elements of potentially high visual amenity, including trees, and it would therefore be likely to adversely alter the local townscape and landscape character".	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative

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		interested to see the rationale behind this. The conclusion ("this is a sustainably located green belt site") is at best meaningless and at worst a prejudiced contradiction in terms. IL3/H - Coutances Way: developing this open field into housing is simply incompatible with the notion of retaining green belt on this side of Ilkley. The appraisal itself admits this: "the site has a major potential impact on the Green Belt…makes a major contribution to the purposes of including land in the Green Belt… would have a major impact on openness." It's also in a flood zone, which is addressed minimally with no sign of local knowledge of the extent to which flooding is becoming a serious problem in Ilkley. Again, the Summary prejudicially concludes that the site is "sustainably located" without having done anything to demonstrate that this is the case (rather the reverse). I cannot comment on the SA as I cannot find it - it's mentioned as an 'accompanying report', which I can't locate (doubtless my error) - but again, if it does conclude that developing this site would be viewed as sustainable I would be very interested in seeing the rationale behind it.	The SA does identify that there are TPOs on site which is considered under SA Objective 6. The SA does not state "this is a sustainably located green belt site" in relation to site IL1/H and has been identified as minor negative under landscape due to the loss of Green Belt land. Site IL3/H has also been identified minor negative in terms of landscape & townscape for reasons including Green Belt and the loss of open greenfield. The SA site summary does not state that the site is "sustainably located". Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear. Sites with significant constraints worth discussing have been identified throughout the Regulation 19 appraisal work in a proportionate manner.
70	7009 (Agent: 846) 29689 Site: IL/013 (Alternative Site/Rejected Site) Object	The site has been assessed against 17 sustainability appraisal objectives, with a large proportion of the scores being positive (6 out of 17) relating in particular to most socio-economic themed objectives and the location of the site in relation to transport links, educational facilities and employment areas. The site is in Zone 1 Flood Risk. The site scores only a minor positive against contributing to satisfying Bradford's housing needs. It is considered that this is a major positive. A neutral score is awarded in the safe and secure objective. The site receives minor negative scores against 5 of the sustainability objectives and major negative scores against 2 objectives. We disagree with some of these negative and neutral scores and provide the following comments. - Land & Buildings: A major adverse effect is predicted against this objective due to the loss of greenfield land. A large number of preferred sites in the District are greenfield.	The SA methodology awards a major negative score under SA Objective 3: Land & Buildings if the site would result in loss of >0.4ha greenfield land. SA Objective 6; Biodiversity & Biodiversity has been awarded a minor negative score due to the loss of greenfield land. Mitigation enhancements will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity	A refresh of the site appraisals and change in method to not focus on significance is proposed. The onus on site assessment in the SA should not be on making decisions on site allocation, it should help in understanding which sites are more likely to be reasonable to consider in further detail as packages of sites / spatial strategies.

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		• Water Resources: The development of the site would result in a minor increase in water consumption. This applies to all development. • Biodiversity and geodiversity: New development could reduce biodiversity value and reduce local ecological connectivity. The site provides an opportunity to enhance biodiversity value, with the provision of open space and additional landscaping. It is considered that the score should be amended to a neutral score. • Landscape & Townscape: The SA states that the development of this site would "be likely to adversely alter the local townscape and landscape character" however notes that the nearby existing built form could help to limit the magnitude of potential effects. It is considered that the development of this site provides the opportunity to incorporate additional planting and landscaping buffers, resulting in a positive townscape and landscape impact. The score is negatively weighted. • Cultural Heritage: The site scores a minor adverse effect against this objective. The Sustainability Appraisal for both sites IL/013 and IL/014 score a minor negative against the cultural heritage objective, with the SA referring to the Grade II Listed Buildings associated with Wheatley Grange, with both appraisals concluding that it is considered to be likely that new development would "be likely to adversely alter the setting of these sensitive heritage assets." Mitigation via development layout is achievable for both IL/013 and IL/014, and both sites should be allocated. • Air quality: It appears that all potential development receives a minor adverse impact against this objective due to the increase in air pollution in relation to existing levels due to pollution associated with homes and transport movements. The site is not in an AQMA or CAZ. • Accessible services: The site scores a neutral effect against this objective, despite the site being within 400m of a Tesco local store and Petrol Station on the A65, a local Factory shop, and within 800m of the local shops on Wheatley Lane, the recently opened Garden Centre on the A65. It is considered that the daily needs of residents can be met within close proximity (within the SA required 600m distance). The site should therefore score positively against this objective.	to see which alternative sites would require the least amount of mitigation. This is also relevant in terms of the landscape & townscape, and cultural heritage, safety & security and social cohesion scores. A minor negative score has been awarded to SA objective 9: air quality due to 'the proposed development would make a minor contribution towards worsening air quality' as per the SA methodology. The site has been awarded a minor positive score against the Housing SA Objectives as it proposed the development of 20 homes, and a major positive score is awarded for proposed developments of 500 homes or more. On further examination site is within 400m of a Tesco Express. As such, the score has been altered to minor positive and states "The site provides residents with good access to key services and amenities, being approximately 130m from a Tesco Express and less than 30-minute walk to Ilkley town centre where residents would have access to a range of services and amenities" on pg. 51 of Appendix F – Wharfedale. The majority of sites have been identified as uncertain (+/-) in relation to SA Objective 5: Safe & Secure due to the introduction of new potential targets for crime in a location where there is currently none, however,	

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		• Social cohesion: It appears that the site receives a neutral score on the basis of the proximity of the site to the A65 and the noise, air and light pollution associated with this. This does not allow for appropriate design measures, siting, orientation, or landscaping that could mitigate this. It is considered the site has been negatively scored and it should score a minor positive. • Safe & Secure: We disagree with the neutral score against this criteria, which seems overly negative, particularly given the explanation that new development could potentially enhance community cohesion and well-being, or increase natural surveillance, and so could help to combat the local risk of crime. There is no valid reason why this should not score a minor positive, as the development could incorporate various measures to enhance the safety and security of site-users. • Employment: We disagree with the neutral scoring against this objective, which seems overly negative. The site is located within 5km of Ilkley town centre which is the criteria for a minor positive rating, as Ilkley is a major employment area. The reason for the neutral scoring relates to the extent to which the loss of agricultural land could impact on employment opportunities in agriculture in the local area. This is not considered to be a valid reason for the negative scoring, given the small size of the site at 1.28 ha.	development could potentially enhance community cohesion and wellbeing. SA Objective 18: Employment has been amended to minor positive and reference to loss of agricultural land has been removed. Assessments for a number of sites has already been amended to reflect this comment. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal. Council to answer why site was identified as an alternative site not as an allocation.	
71	7011 (Agent: 6842) 29696 Site: ME/005 Object	The other reason the Council have dismissed the site is due to 'landscape impacts'. In order for the Council to have come to that conclusion we would expect there to have been a landscape document within the Council's evidence base which had been prepared by qualified landscape architects and which assesses the site and its landscape impacts. We have been unable to locate any such document and it is therefore assumed that the Council are relying on the site appraisal comments within the Sustainability Appraisal (SA), which has been prepared by Arcadis. My understanding is that Arcadis do not offer a landscaping service as part of their multi -disciplinary offer and we would therefore question whether the SA provides appropriate evidence to make decisions on landscape matters.	Site ME/005 is identified by the Council as an 'alternative' site, which does not necessarily mean that the Council will not allocate the site, and therefore that is why it is being considered as assessed through this process. Site ME/005 is within the Green Belt and is greenfield and has scored negatively against SA Objective 7: Landscape and townscape according to these factors. The SA does not seek to prepare site-specific detailed landscape assessment for each	Council to confirm if any landscape character assessment work will be undertaken for sites/ All reasonable site options have been considered through the councils comprehensive site assessment and selection process, which includes consideration of landscape character.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		Regarding site ME/005, the SA concludes as follows under question 7 (landscape and townscape): "*The site is 1.2km south of the Nidderdale AONB, but residential development here would not be expected to have a discernible impact on or alter views into or out of the AONB, due to the presence of existing and similar built form to the north of the site and its location adjacent to the village of Menston. However, residential development at this site could result in the loss of open greenfield and Green Belt land that contains GI elements of potentially high visual amenity, including trees, and it would therefore be likely to adversely alter the local town scape and landscape character, although the nearby existing built form could help to limit the magnitude of potential effects*". In terms of landscape impacts, we can not ascertain the Council's concerns on this matter as there is no landscape assessment within their evidence base, so again, it is not clear what specifically they deem to be the landscape impact that prevents the site from being allocated. The Council's reliance on the SA is not considered to be sufficient in terms of assessing landscape impacts. Indeed, the SA states that development of the sit would potentially lead to the loss of green infrastructure elements such as trees that are high visual amenity, which would likely adversely impact upon town and local character. However, Pegasus' assessment of the site concludes very differently, see below. "*It is not considered that the development of the site would result in the loss of any landscape features that hold an individual landscape or visual value or are of a specific importance to the wider landscape character. Existing landscape features worthy of retention such as the trees within and bounding the site, and the stone walling along Burley Road could be incorporated as part of a new development. Together with new planting, retained vegetation would contribute to the well wooded character of the locality and help to integrate new development into the landscape*".	potential site as the SA process is necessarily high-level. There is no requirement for the council to commission site-specific surveys such as landscape assessment to determine the sustainability of sites and the SA process is considered more than sufficient to provide the council with additional information to help inform the decision of site selection and rejection. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	Ensure consistency in the approach to landscape effects.
72	6974	The inaccuracies in the preparation of the Ilkley Local Area Strategy document do not give confidence as to the preparation of the Local Plan for Ilkley. This is especially so when the inaccuracies are so	7 - SA Objective 7 – a minor negative score here is in line with the SA methodology as the development	All reasonable site options have been considered through the councils

No.	Respondent	Representation	Arcadis Response	AECOM Response
	29779 Site: IL1/H Object	significant as to completely misrepresent a site. For example, regarding the Sustainability Assessment for site IL1/H Wheatley Grove where the Site Pro Forma says 'There are unlikely to be any significant effects, either positive or negative, on any SA Objective arising as a result of development at this site' yet the first line of the summary of the SA assessment for the same site (IL/009) is 'A major adverse effect is predicted on the land and buildings SA objective due to the loss of greenfield land'. The inaccuracies within both the Site Pro Forma and the Sustainability Assessment continue and are so numerous as to warrant separate treatment below against the numbered SA headings. It is clear this site has not been accurately assessed and should be removed from the Preferred Options site allocations as it does not support the policies of the Local Plan or NPPF regarding exceptions for development on Green Belt. The level of habitat, landscape character and surface water flood risk/drainage mitigation plus the need for replacement of an area of open space of high visual amenity and biodiversity and tree cover with compensatory Green Belt enhancement and a new area to replace that which would be unnecessarily destroyed in order to achieve a development with limited accessibility to local services and a need to depend on cars begs the question as to why this site has been included. Inaccuracies and points to address in SA for the site: 7. The negative impact of housing development on the high visual amenity of this area for the local community and visitors has been underestimated and should be seen as a major negative. 8. Ben Rhydding Drive has listed buildings/ heritage assets. 9 - References 'new employment premises' (?) yet 130 residential dwellings proposed with associated air pollution within the SSSI Risk Zone (above) 10 – Ben Rhydding Drive is a private not an access road therefore access required via narrow/poor sight lines Wheatley Grove/Wheatley Lane junction increasing the hazards to this junction (which would need re-modelling). It would also direct more traffic up Wheatley Grove round to the narrow/poor sight lines junction with High Wheatley and then on to the blind corner junction of High Wheatley/Ben Rhydding Road. This increase in car traffic would endanger walkers and cyclists and therefore not supporting national	would slightly discord with the surrounding area and character of local landscapes, due to the smaller size of the site, this is not seen as significant discordance, and therefore the score shall not be altered. 8 - SA Objective 8 – the site is located approximately 350m from the nearest heritage asset, Grade II Listed 'Wheatley Cottage', which is separated from the site by vegetation and built form and therefore, no impact on the proposed development on heritage assets would be likely. 9 - The SA does not state that the site is proposed for employment use, but indicates that 'the construction and occupation of new homes could have a minor beneficial impact on the local economy, increasing the demand for local goods and services and enhancing the pool of potential employees for local businesses'. 10 - Road access to this site could be off Ben Rhydding Drive, High Wood or Wheatley Grove, and therefore, road access is not deemed to be a limiting factor. Road safety would be considered at a later stage of planning. 11 - Housing density and a decision relating to the benefits vs the costs of development is a decision to be made by the Council and not the SA.	comprehensive site assessment and selection process. Please refer to this report. As mentioned previously, the SA should not be used to make decisions, only to aid the process.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		and local active travel policies. The Wheatley Grove access increases the distance from rail station and no frequent buses this is a major negative with a declining baseline. 11 – Building at 18dpha does not meet the Local Plan's density requirements meaning this development, or one of any increased density does not represent a significant enough contribution to Bradford's housing numbers and tenure mix to warrant the negative impact of destroying the functionality of this site within a SSSI Impact Risk Zone. This is a major negative.		
73	6974 29780 Site: IL1/H Object	12 – The distance from accessible services does not support the Local Plans '15 Minute Neighbourhood approach' 13 – Ben Rhydding/Ilkley's infrastructure and services are already overstretched and cannot support more (e.g. places at nearest primary schools for children in this area have not always been guaranteed) This is a major negative. 16 – The area is already of substantial regular use and benefit to local residents for the reasons stated and especially during the Covid pandemic. A development of the size proposed would have a major negative impact on the wellbeing of existing residents and PROW users due to destruction of natural habitats. Wharfedale Hospital, Otley is 10km west of the site. 17 – Ilkley Grammar School is the nearest state school. Both the local primary and secondary school are beyond the target distances. 19 – The history and scale of the proposed development show construction is likely to be by a larger developer not smaller local builders. The level of disruption and extra construction traffic could also be a negative for local businesses therefore suggesting a positive/negative effect. Recommend Object and remove completely from site allocations as unsustainable.	12 - SA Objective 12: Accessible Services has been assessed in line with the SA methodology and will not be altered. 13 - The capacity of local services is not considered in the SA unless stated by the Council. 16 - The site is not identified as a green space and therefore cannot be assessed as beneficial for wellbeing. 17 - Ilkley Grammar School is not a secondary school which is accessible to all and therefore could not be assessed a publicly accessible school. The minor negative score for SA Objective 17 – Education will not be altered. 19 - The type of builders and the level of disruption the construction may have is not considered as part of the SA process. The capacity of local services and mitigation can be considered in the next iteration of the SA.	Ensure consistency in the approach to amending or updating any site appraisals at future stages. All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear and data limitations.

No.	Respondent	Representation	Arcadis Response	AECOM Response
74	6974 29786 Site: IL2/H Support	Agree with Sustainability Assessment and note 6 – Biodiversity and Geodiversity as only area with major negative effect due to triggering likely significant effects on the South Pennine Moors SPA/SAC and the North Pennine Moors SPA/SAC. Under 10 – Transport agree the need for a segregated cycle path linked between Ilkley and Addingham (suggest looking again at Wharfedale Greenway route) to alleviate pressure on A65 and work towards a net gain improvement in air and noise quality and social cohesion and enable any development on this site to be car free to support a mix of housing including affordable homes. Recommend Neutral, as exceptional circumstances for release of Green Belt not demonstrated, but with positives.	No further comments on this representation. Transport has been assessed against the methodology which is set out in the SA report. The requirement for affordable housing will be set out in in a Local Plan policy. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	Sites should be appraised using more objective criteria and should not be conflated with an appraisal of reasonable alternatives to strategic matters. All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.
75	6974 29788 Site: IL3/H Support	The development of this site would have major and minor adverse effects on natural environment indicators of local, national and international significance as well as Green Belt and greenfield loss, land and buildings, Green Infrastructure of high visual amenity, landscape character, cultural heritage and air quality. Agree in the main with the Sustainability Assessment for this site but emphasise NPPF Paras 157 and 160 demand a net improvement to flood risk as a result of new development. However due to the impact of climate change the increase in the number and severity of severe flooding incidents and risk of water pollution experienced in the area over recent years arguably shows the decline in the baseline trend to be accelerating. This results in the A65 area being impassable for all	The impact of the proposed schemes of flood risk has been considered, and site-specific surveys will be carried out at the planning stage would help to mitigate any flood risk and hydrology concerns. Details of how biodiversity net gain would be achieved on site would be considered at a later stage of the planning process. At this stage, it is assumed all proposed development would achieve biodiversity net gain	Agree.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		and places residents properties at risk of flooding as well as expensive insurance claims for the well-used (by Ilkley Grammar School, local residents and visitors) Ben Rhydding Sports complex on Coutances Way and probably in time too for the Moss and Moor Garden Centre nest to this. Due to these flooding incidents and risks, the existence and continuation of unsustainable drainage solutions and the continued challenges of pollution in the River Wharfe (now given Designated Bathing Status) any development on this site must be seen in tandem with the proposed major Sun Lane development in Burley in Wharfedale and longstanding and recent attempts by private developers to develop the Old Middleton Hospital site on Carters Lane This site is not being deemed a developable site in Harrogate Borough Council's Strategic Housing and Economic Land Availability Assessment 2016 (Site Reference OC6) and therefore does not appear in any Duty to Cooperate Statements of Common Ground relating to CIL or Section 106 payments to support local infrastructure from such a development which would increase pressure on the Denton Road/A65 bridge crossing and surrounding areas well used by cyclists. Consideration also needs to be given to the impact on downstream settlements along the river who will be impacted. For the SA identified major positive affect on Transport to be in keeping with Climate Change mitigation and to provide net gains in biodiversity and flood reduction any development on the site must be car free and include investment in the Wharfedale Greenway. This should link any new and existing dwellings along the A65 area with the Ben Rhydding Sports complex, Ben Rhydding amenities, public transport, Ilkley town centre and on to Addingham. It is hard to see how proposed development and WYCA investment in Park and Rail on this site would support the NPPF Paras 170(d) and 174 requiring biodiversity net gain and NPPF Paras 157 and 160 a net improvement to flood risk. As a positive the Wharfedale Greenway route would alleviate pressure on the existing A65 corridor and work towards a net gain improvement in active travel, air and noise quality and social cohesion and enable any development on this site to be car free to support a mix of housing including affordable and social housing.	as required by the NPPF (and now the Environment Act 2021, previously known as the Environment Bill). Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	

No.	Respondent	Representation	Arcadis Response	AECOM Response
		Recommend Object with some positives		
76	6974 29797 Site: IL4/H Object	Agree in the main with the Sustainability Assessment for this site however given the increase in the number and severity of severe flooding incidents and risk of water pollution over recent years consider 4 – Climate change resilience and 5 – Water resources need revising to become major negative effects. The baseline trend has been recognised as declining however due to the impact of climate change this trend has arguably become stronger. Due to limited car parking facilities further caution is expressed about even sensitive development of this to prevent further adverse effects to 13 – Social cohesion. Current position of land ownership and size of site need checking as car park appears included in site allocation? Due to major adverse effects on the Ilkley Conservation Area, Old Bridge Scheduled Monument, major and minor adverse effects on natural themed indicators including recent flooding incidents and adverse effects on social cohesion due to limited parking and air quality. Recommend Object	SA Objectives 4 and 5 have been assessed in line with the SA methodology. Further surveys will be carried out later in the planning stages to assess site-specific flood risks and hydrology concerns. Car parking spaces for dwellings is not considered at this high-level stage of assessment. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	Agree.
77	536 30133 Site: IL/016 (Alternative Site/ Rejected Site) Object	There is a major error in the summary assessment for this site which relates to the already mentioned Flood risk assessment for the site and the master plan revisions to contain the whole of the development within flood zone 1. In addition to the master planning to date it is normal practice to carry out more detailed site specific flood risk assessment and to incorporate a series of SUDS mitigation measures in drainage proposals. The assessment by the Council is speculative in nature. Given the very large areas of open land retained and the other arguments made this rating for criterion 4 should be changed to minor or neutral impact. In the summary statement reference is made to a large TPO woodland. The only large woodland near the site is that on the northern boundary which is outside the site boundary and is owned by Ilkley Golf Club. The agricultural land grading at 3 could be in the 3a or 3b sub categories. It is however classed as sheep grazing. The soil quality will not be depleted by the proposals. The detailed master planning of the site can more than adequately accommodate these water bodies through good drainage and	Mitigation enhancements will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. This would include site-specific flood risk assessments. As such, the masterplan proposals have not yet been considered in the SA assessments and shall be taken into consideration if the site is allocated within the final Plan. Furthermore, a precautionary approach has been	As above, the proposed updates to site assessment will not focus as heavily on categorising the significance of effects. The approach will outline the broad performance of sites (policy/mitigation-off) to help sift unreasonable site options before exploring detailed reasonable alternatives.

No.	Respondent	Representation	Arcadis Response	AECOM Response
		environmental practice. Black Beck can be successfully accommodated within the development, suitably protected and maintained and its corridor made subject to environmental improvements. It is clear that those carrying out this assessment have either not looked at the master plan proposals or recognized the wide protection/environmental corridor contained in the current master plan proposals. This rating should be altered to minor negative or more appropriately neutral at this stage. If the master plan mitigation proposals are taken into account a positive rating would be merited. Criterion 6 Biodiversity: - Again the description of our proposals and the considerable environmental enhancements they contain has not been taken into account. A major mosaic of enhanced habitats is proposed though this has yet to be designed. The work carried out to justify this case over a period of some seven years provides, together with evidence in the Growth study, a much stronger environmental and all round case than that presented for the preferred Council owned site to the east of Ilkley. Criterion 8 Cultural Heritage: - The setting and proximity of parts of the Ilkley and Middleton Conservation areas can be taken fully into account in the subsequent detailed design stages. The new Government policy requirement to create beauty of place and building groups will set appropriately high standards to support this. A negative scoring is based only on supposition. Criterion 11: - A total of 175 -200 new dwellings represents a substantial potential contribution to housing need in Ilkley and the District as a whole. Consequently this is more than a minor positive contribution. Criterion Health 16 - If health and wellbeing are fully taken into account then this development with major recreation, natural and landscape content brings a substantial benefit towards disease prevention and human wellbeing. This counterbalances the distance to health facilities rating and the overall assessment should be neutral. Criterion 18 Employment - there will be no proven loss of agricultural employment as the transitional sheep grazing (sheep brought in form	taken to the SA appraisal to encapsulate the worst case scenarios, but it understood that when incorporating Plan polices and site-specific mitigation, some of these identified effects would be mitigated, such as potential cultural heritage effects. The site has been identified as major negative in relation to SA Objective 3 as the site is <50% brownfield and would result in loss of >0.4ha greenfield land, and it is not the agricultural quality of the land which is leading to the negative score. The north of the site coincides with areas of low, medium and high surface water flooding. Development on this site could also lead to an increase in impermeable surfaces and therefore, a minor negative score has been awarded. The SA states that not the whole area of TPO woodland is within the site boundary, but trees within the boundary would likely be lost through the proposed development. The site has been awarded a minor positive score against the Housing SA Objectives as it proposed the development of 175-200 homes, and a major positive score is awarded for proposed developments of 500 homes or more, in accordance with the SA methodology. SA Objective 16 – Health is assessed in line with the SA methodology and the	

No.	Respondent	Representation	Arcadis Response	AECOM Response
		another farm) on provides part of the employment of one or two people.	SA does not 'balance out' adverse and benefits, and rather assesses based on a 'worse-case scenario' and therefore, the score will not be altered. SA Objective 18: Employment has been amended for all sites to remove reference to agricultural land as employment opportunities and therefore, where this is the case, the SA score has been amended to minor positive. Detailed appraisal of preferred sites including relevant mitigation to be considered at the next stage of SA during detailed appraisal.	
78	536 30148 Site: AD3/H & AD4/H Comment	Given the proposals for the large area of retained and environmentally enhanced open land associated with the delivery of the two proposed allocations the local planning authority will need to significantly review their scoring system for what we propose will be a wider mixed use site bringing all the benefits summarized in the earlier sections of this submission. The outline master plan proposals comprised in the Environmental Proposals Plan provide mitigation and enhancement proposals which should change the negative assessment against criteria 3, 6, 7, 8, 9 and increase some of the positive assessments including criteria 10, 11, 12, 16 and 19.	Mitigation enhancements will be considered later in the SA process to ensure that the assessment of reasonable alternatives is fair and consistent, by not considering site-specific mitigation for any sites at this stage. This gives the Council the opportunity to see which alternative sites would require the least amount of mitigation. Therefore, the assessments of these two sites will not be altered at this stage.	All reasonable site options have been considered through the councils comprehensive site assessment and selection process. Please refer to this report. Further SA work focused on 'packages' of reasonable site options to better understand the implications of cumulative growth for different spatial strategies. Alternatives are appraised consistently and assumptions about mitigation made clear.

APPENDIX B Scoping Report Update (2026)

Integrated Appraisal of the Bradford Local Plan

IA Scoping Report

Bradford City Council

September 2026

Delivering a better world

Quality information

Prepared by	Checked by	Verified by	Approved by
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Revision History

Revision	Revision date	Details	Name	Position
V0.1	July 2026	Draft for internal review		Environmental Planner
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1. Introduction

1.1 Background

1.1.1 AECOM has been commissioned to undertake an independent Integrated Appraisal (IA) in support of the emerging Bradford Local Plan.

1.1.2 This document is the IA Scoping Report. This report sets out the policy context for the Plan and IA, presents baseline information, and proposes a framework of sustainability issues and objectives that should be a focus of, and provide a methodological framework for, the appraisal of the emerging Local Plan

1.2 Plan context

1.2.1 Bradford Council is preparing a new Local Plan to provide an updated planning policy framework for the District. The emerging plan is being informed by the latest evidence base and will establish a spatial strategy to guide the location, scale and form of development, supporting Bradford's long-term growth and regeneration ambitions.

1.2.2 Once adopted, the emerging Local Plan will form a key part of the statutory development plan for Bradford District.

1.2.3 The development plan for Bradford currently comprises a portfolio of planning documents including the adopted Core Strategy DPD, two Area Action Plans (Bradford City Centre and Shipley and Canal Road Corridor); the Waste Management DPD and carried forward policies from the Replacement Unitary Development Plan (RUDP). The new Bradford District Plan seeks to simplify this structure to a single planning document.

1.2.4 The emerging Local Plan is at an advanced stage of development. The latest Pre-Submission (Regulation 18) consultation took place in 2021, with documents available here. The Plan is now moving towards final Submission Draft (Regulation 19) stage which is anticipated to take place later in 2026.

1.2.5 In terms of consultation on the scope of the IIA to date, the Council first consulted with statutory consultees in 2019 on the IA Scoping Report. This was subsequently updated in 2021. Given that significant time has passed since the initial Scoping Consultation, the Council considered it useful to prepare a new scoping report to ensure that the appraisals undertaken in support of the Submission Draft version of the Plan remain appropriate. Though focused scoping updates have been undertaken as the Plan making process has progressed, it is considered helpful to re-establish the scope, explain the approach to integration and set out methods clearly.

1.3 The plan area

1.3.1 The Bradford Metropolitan District covers an area of approximately 141 square miles. The District is characterised by a diverse settlement pattern comprising the regional city of Bradford, the principal towns of Keighley, Shipley, Bingley and Ilkley, together with a network of smaller towns, villages and rural communities. Much of the District is within the South and West Yorkshire Green Belt, reflecting its important role in maintaining the separation of settlements, safeguarding the countryside from encroachment and preserving the character of the area.

1.3.2 More widely, Bradford is considered the 'gateway' to the Yorkshire Dales National Park, and the District includes part of the internationally designated South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC), together with Sites of Special Scientific Interest (SSSIs), Local Nature Reserves and an extensive network of locally designated biodiversity sites. Bradford also contains a rich historic environment, including the UNESCO World Heritage Site of Saltaire, numerous conservation areas, listed buildings and scheduled monuments that reflect its internationally significant industrial heritage.

1.3.3 The District is served by strategic road and rail connections linking it with cities of Leeds, Manchester and the wider region. The district has a fast growing and dynamic workforce, a high proportion of self-employment and new business start-ups and a growing younger population.

1.3.4 The Plan area is illustrated in **Figure 1.1** overleaf and will cover the whole of the District.

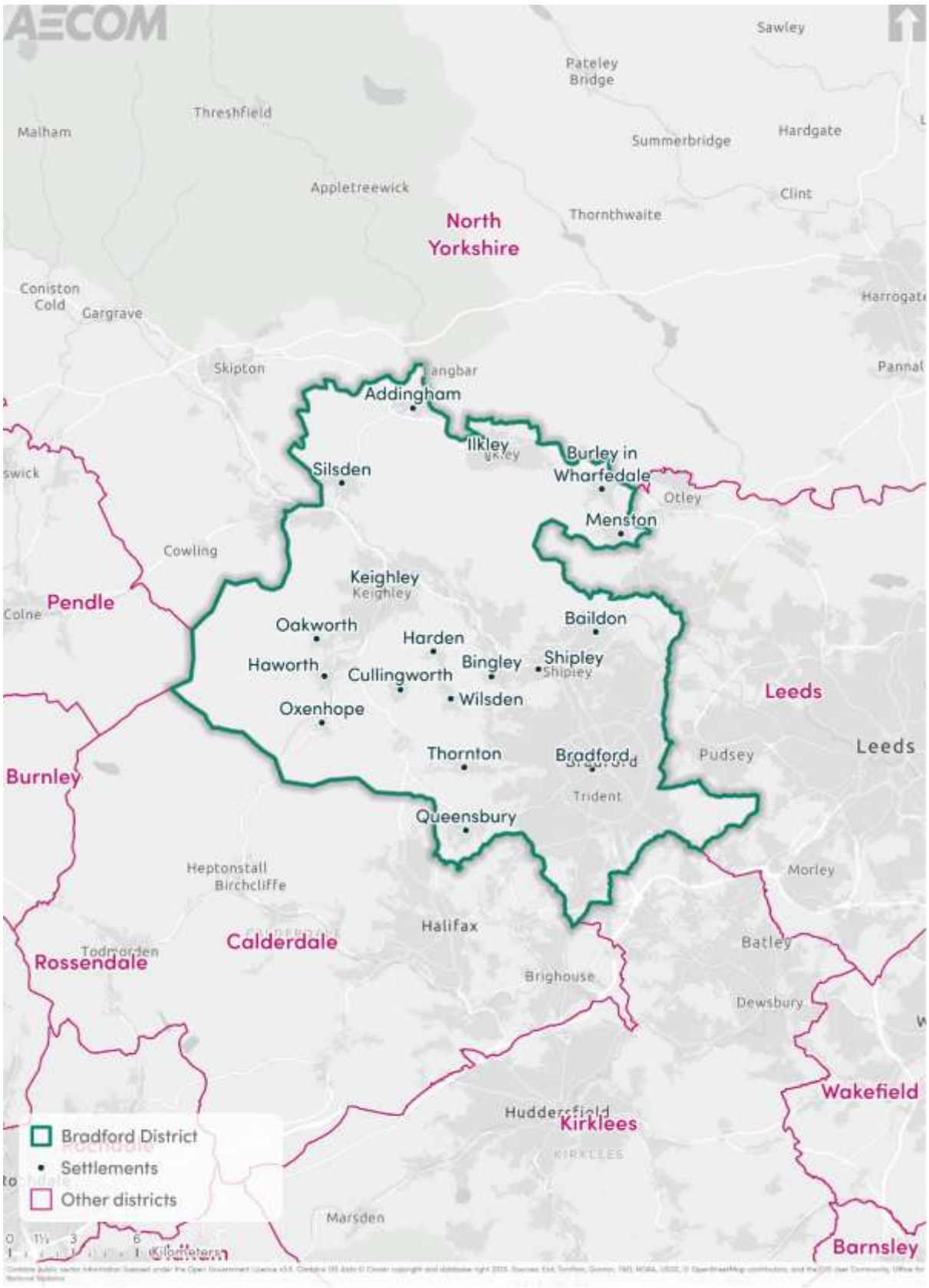


Figure 1.1: Plan area/ geographical context

1.4 What is Integrated Appraisal?

1.4.1 There are a range of impact assessment tools that can be used to assess how a plan, programme, project, or particular development performs against a range of criteria. The common aim of these tools is to gain an understanding of impacts upon environmental, social, or economic issues (or a combination of these); with the aim of achieving a better performing proposal overall.

1.4.2 Certain impact assessment tools are a legal requirement for when preparing particular plans, and this is the case for the new Local Plan. For example:

- A Sustainability Assessment/ Strategic Environmental Assessment (SA/ SEA), which reviews and predicts how a proposal performs against a range of environmental and sustainability factors (including economic and social considerations); whilst suggesting ways in which mitigation and enhancement measures can be taken into consideration. SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004. Key stages can be seen here.
- An Equalities Impact Assessment (EqIA) reviews and seeks to ensure that equality and fairness is achieved in the delivery of services and how people experience life. Requirements emanate from the Equality Act 2010.
- Local Authorities have a statutory duty to protect and improve health and wellbeing as set out in the health and Social Care Act 2012. A Health Impact Assessment (HIA) is one of many tools that authorities can use when seeking to ensure that they satisfy this statutory duty. An HIA is a practical approach used to judge the potential health effects of a policy, programme or project on a population, with the aim of maximising the proposal's positive health effects and minimising its negative health effects[1]. As well as direct effects on health there is a need to consider the 'social determinants' of health and wellbeing that contribute to health.
- Habitat Regulations Assessment (HRA) seeks to identify and assess any aspects of a Local Plan that would cause any adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites.

1.4.3 It is possible to undertake these processes separately, but often an integrated approach is taken. This is sensible given that there are considerable overlaps between the processes.

1.4.4 An Integrated Appraisal (IA) therefore helps to reduce duplication of efforts (and the number of separate reports); whilst taking advantage of the strengths of each impact assessment tool. In turn, this aids in undertaking effective consultation with interested parties.

1.4.5 To undertake a successful IA, it is important to set out the approaches clearly from the outset and to invite comments. This is one of the purposes of the Scoping Report.

[1] World Health Organisation (2023) 'Health impact assessment' can be accessed here.

1.4.6 It is also important to ensure that the IA is closely aligned to plan-making activities so that it can guide/ influence decisions in a meaningful and positive way.

Our approach to integration

1.4.7 SA/ SEA can be regarded as the most comprehensive impact assessment tool with regards to plan-making in the UK. This is because it is enshrined in legislation and covers a wider range of factors compared to more specific impact assessment tools such as HIA/ EqIA.

1.4.8 For this reason, the SA/ SEA process is typically used as the over-arching framework for which an integrated impact assessment is conducted.

1.4.9 The requirements of HIA and EqIA are then woven into the SA process. While it is noted that separate EqIA and HIA reports were prepared at issues and options (Regulation 18) stage (available here), it has since been considered a more efficient approach to integrate the assessments as established above. This is the approach being taken for the assessment of the new Local Plan and reasonable alternatives.

1.4.10 Habitat Regulations Assessment (HRA) have entirely separate legislative drivers and purposes and will be a separate process, but it is incorporated into the IA in the following ways. It has helped to inform the biodiversity section of this Scoping Report.

Meaningful integration

1.4.11 Integrated Appraisal (IA) should cover all the relevant sustainability factors that a plan could have significant effects upon. In this sense, health issues, equality and diversity issues, economic issues, social issues, and climate change issues, would all typically be covered through the SA process.

1.4.12 However, IA is not simply about including health, equality, and community safety issues within a standard SA process; rather it should present nuanced approaches to data gathering and assessment within the broader framework of an SA that incorporates SEA. This ensures that the principles and methods of EqIA and HIA are captured properly, whilst using the SA as the overall approach to conduct the assessments.

1.4.13 **Table 1.2** sets out how each step of the IA process reflects the requirements and benefits of EqIA, HIA and HRA in a meaningful, but proportionate way, aiding in effective, concise consultation.

Table 1.2 Integration of EqIA, HIA and HRA into each IA stage

IA stage	How have EqIA, HIA and HRA been integrated?
Scoping	Specific baseline information presented for each group with protected characteristics. Information relating to health characteristics of affected populations have been included in a specific health and wellbeing chapter. Further health related baseline data is incorporated throughout the scoping report, with health and wellbeing forming a central theme and vulnerable 'receptors' being identified throughout. A high level HRA scoping exercise has been completed. This has informed the biodiversity baseline, identification of key sustainability issues, and IA objectives/ assessment questions.
Appraisal framework/ methods	The appraisal methodology includes several objectives relating to health, equality, economy, society, and environment (including climate change, and biodiversity); with specific objectives set out in the IA framework. Sources of information, assumptions and team members that will undertake appraisals have been identified. This will ensure that the appraisal process draws on appropriate knowledge, experience and interest in health and equality. Key stakeholders (for example Public Health) will be engaged to input to and / or review the assessment findings. This is important because EqIA, HIA, and HRA work best when they involve people who can contribute different perspectives, knowledge and insight.
Appraisal of options	The options identification process will seek to identify whether there are approaches that are led by social value and health outcomes. Appraisal of options will report upon the implications with regards to health impacts and equality (through the IA process). The HRA will consider whether a plan is 'likely to have a significant effect' on a European site.
Appraisal/ screening of policies	The Plan will be appraised against the IA framework, with the primary aim of identifying significant effects. The IA involves objectives and supporting questions that will interrogate the health and equality implications of the Plan, in addition to those exploring impacts and opportunities surrounding carbon/ climate change. The HRA will consider whether a plan is 'likely to have a significant effect' on a European site and consider the need for an appropriate assessment.

IA stage	How have EqIA, HIA and HRA been integrated?
Mitigation and enhancement	Recommendations are made in SA, EqIA and HIA; each with the intention of avoiding and minimising negative effects and enhancing benefits. Where adverse effects are identified, the HRA will recommend mitigation measures and alternative solutions.
Detailed appraisal (if necessary)	Should significant effects be identified, this would trigger further exploration of potential impacts through the following steps: Gather additional/ more detailed information with regards to potentially affected receptors. Identify impact pathways for specific affected groups

1.5 IA scoping explained

1.5.1 Scoping is the first stage of the SA process, as established through national planning practice guidance. It is undertaken to identify sustainability issues and objectives that should be the focus of, and provide a methodological framework for, the appraisal of the emerging Local Plan. In order to facilitate the identification of key issues / objectives (updating the scope established in 2019/2021), the following steps have been undertaken:

- Policy context review – a review of existing policy and evidence established from the national to local level
- Baseline review – a review of the current 'state of the environment, economy and society', including health and equalities, and a review of key trends and anticipated impacts that the existing / emerging Local Plans is likely to have.
- Key issues summary – a summary of the key (in the sense that the plan may have an effect) problems and opportunities for the District, as established through the review above.

1.5.2 Following this, **Chapter 9** presents the full IA Framework, refining the broad key issues into a concise set of sustainability objectives aligned with the SEA Directive topics and supported by a series of assessment questions. The framework has been developed taking into account the District's baseline information, as presented in **Chapters 2–8**.

1.5.3 **Chapter 10** outlines the next steps for the IA process.

2. Communities, population and housing

2.1 Focus of topic

2.1.1 This topic focuses on population and the demographics of residents in Bradford, as well as crime levels, connectivity, and housing access and affordability. There is also a focus on deprivation that can affect day-to-day lives and activity in Bradford.

2.2 Key sources of information

2.2.1 **Table 2.1** presents relevant documents identified through the policy and evidence review carried out for the IA. These sources will be drawn upon through the baseline review and identification of key issues.

Table 2.1 Communities, population and housing- key policy and evidence documents

Document Title	Year of Publication
National	
National Planning Policy Framework (NPPF)	2026
Planning and Infrastructure Act	2025
Environment Improvement Plan	2025
10-Year Infrastructure Strategy	2025
Levelling-up and Regeneration Act	2023
Homes England Strategic Plan 2023 to 2028	2023
Long-Term Plan for Housing	2023
The National Housing Federation's Vision for a Long-Term Housing Strategy	2023
Planning Policy for Traveller Sites	2023
Planning Practice Guidance	Various
10-Year Infrastructure Strategy	emerging
Local	
Bradford District Strategy 2025-2035	2025
Bradford District and Craven Health and Care Partnership: Our plans for health, care, and wellbeing in Bradford District and Craven	2025
City of Bradford Metropolitan Council Joint Strategic Needs Assessment: Housing and Health	2024
Bradford District Children and Young People's Strategy 2023-2025	2025
Tackling Empty Homes In Bradford District: Action Plan 2021-2025	2021
Bradford Local Plan Equality Impact Assessment	2021
Bradford Housing Strategy 2020 to 2030	2020
Bradford Homelessness Strategy 2020 to 2025	2020

Document Title	Year of Publication
City of Bradford Metropolitan District Council: Strategic Housing Market Assessment 2019	2019
Stronger Communities Together. A Strategy for Bradford District. 2018-2023	2018
West Yorkshire Combined Authority Transport Strategy 2040	2017
The Northern Powerhouse: One Agenda, One Economy, One North	2015
Bradford Council Tenancy Strategy 2013-2018	2013
West Yorkshire Local Transport Plan 2011-2026	2012
Great Places to Grow Old: Bradford District's Housing Strategy for the Over 50s 2011-2021	2011
Bradford Local Investment Plan 2011-2020	2011

2.3 Baseline summary

Population and demographics

2.3.1 The Office for National Statistics 2021 Census data demonstrates that the population of Bradford increased by approximately 4.6% between 2011 and 2021, to 546,412. This was slightly above the average growth for the Yorkshire and The Humber region (approximately 3.7%) and, less than the average for England (approximately 6.6%) for the same period.

2.3.2 According to the Office for National Statistics Population Estimates, the mid-year 2025 population estimate of Bradford was 559,818, a 2.5% increase from 2021. According to Subnational population projections for England, it is anticipated that the population of Bradford will reach 570,100 people in 2032. This is an anticipated 3.1% increase in population when compared to 2022, which is lower than the anticipated increase for England as a whole (6.4%).

2.3.3 According to the Office for National Statistics 2021 Census, the largest age group in Bradford in 2021 was the aged 10-14 (7.4% of the population), followed by the aged 35-39 (7.2% of the population) and then the aged 15-19 (7.1% of the population). Despite this, between 2011 and 2021, the age profile became older overall. The proportion of very young children (aged 0–4) declined by approximately 1.3%, whilst the share of residents aged 65 and over increased, particularly among those aged 65–74 (a combined increase of approximately 1.7%). Young adults aged 20–29 also formed a smaller proportion of the population in 2021, whereas older working-age groups (50–64) increased. These changes indicate an ageing population, consistent with wider demographic trends. Changes between the 2011 and 2021 Census are shown in

2.3.4 Table 2.2.

Table 2.2 Changes in the age of the population of Bradford

Age group	2011 Census (% population)	2021 Census (% population)
Aged 4 years and under	7.9	6.6
Aged 5 to 9 years	7.2	7.2
Aged 10 to 14 years	6.9	7.6
Aged 15 to 19 years	6.8	6.9
Aged 20 to 24 years	6.8	6.1
Aged 25 to 29 years	7.4	6.3
Aged 30 to 34 years	7.0	7.0
Aged 35 to 39 years	6.8	7.0
Aged 40 to 44 years	6.9	6.5
Aged 45 to 49 years	6.5	6.2
Aged 50 to 54 years	6.0	6.3
Aged 55 to 59 years	5.3	5.9
Aged 60 to 64 years	5.1	5.3
Aged 65 to 69 years	3.6	4.4
Aged 70 to 74 years	3.2	4.1
Aged 75 to 79 years	2.7	2.6
Aged 80 to 84 years	2.0	2.0
Aged 85 years and over	1.8	2.0

2.3.5 Bradford has a large proportion of younger people in its population when compared to regional and national data, as seen in Figure 2.1. Having said this, the structure of the population in Bradford has changed somewhat between the 2011 and 2021 census. There is a reduction in the proportion of people aged 20-29, with an increase in most age groups aged 50 and upwards.

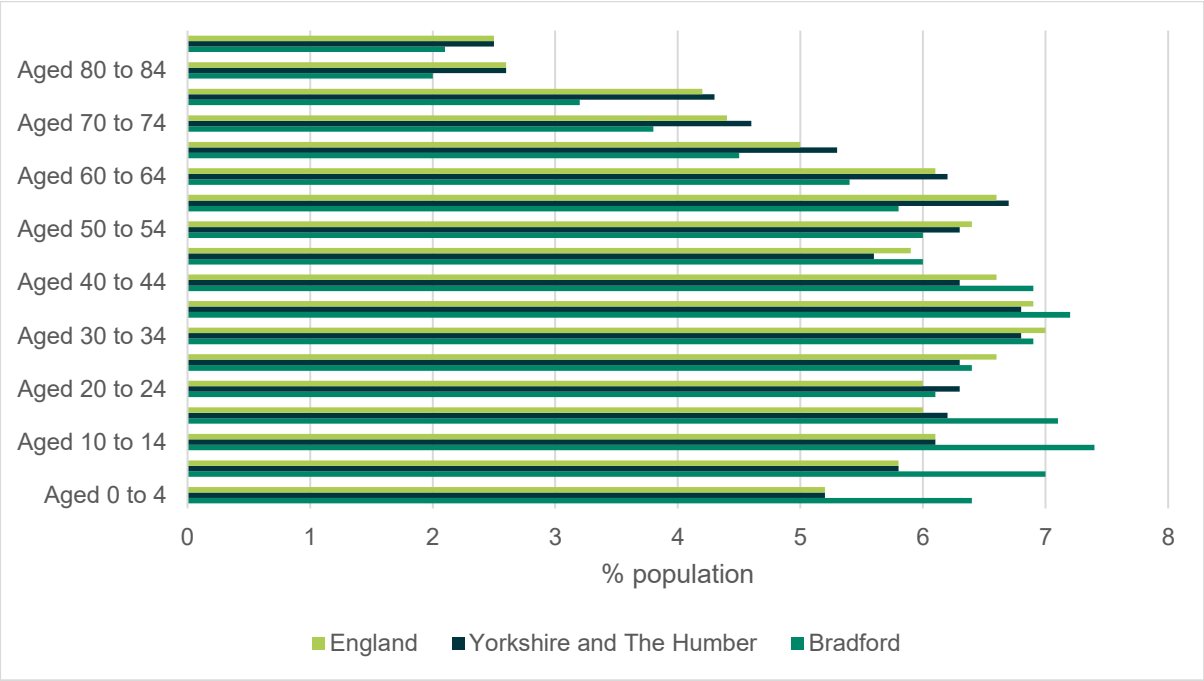


Figure 2.1 Age of Bradford population (Census 2021)

Sex

2.3.6 The 2021 Census data shows that 51% of the population is female, and 49% of the population is male. This is the same as in 2011, and in line with regional and national averages.

Disability

2.3.7 The 2021 Census data indicates that 8% of the population of Bradford are disabled under the categorisation by the Equality Act and have day to day activities limited a lot. This is greater than the average for England (7.3%). Overall, 82.9% of the population of Bradford are not disabled under the Equality Act; and 5.5% of the population have a long term physical or mental health condition but do not experience a limit on day-to-day activities, nor are they disabled under the Equality Act. This is less than the average for England (6.9%).

Religion

2.3.8 The 2021 Census data demonstrates that only 28.2% of the population of Bradford have no religion – significantly lower than across England (36.7%). Of the religious population, 33.4% are Christian - which is lower than the average of 46.3% for England). Other religious groups represent 32.9% of the population – this is predominantly due to 30.5% of the population being Muslim. This is notably higher than across England, where the average is 6.7%. 5.5% of the population of Bradford did not answer questions linked to their religion.

Ethnicity

2.3.9 The 2021 Census data shows that Bradford experiences greater levels of diversity when compared to regional and national data. 32.1% of the population of Bradford is Asian, Asian British or Asian Welsh – much larger than the average for the Yorkshire and The Humber region (8.9%) and England (9.6%).

Marriage and civil partnership

2.3.10 The 2021 Census data indicates that 36.9% of the population has never married and never registered a civil partnership, which is broadly in line with the national average (37.9%). Residents who are currently married or in a registered civil partnership account for 45.8% of the population, slightly higher than the England average of 44.7%. A further 2.7% of the population are separated but still legally married or registered in a civil partnership, in line with 2.2% nationally, whilst 8.6% are divorced or have had their civil partnership dissolved, compared with 9.1% nationally.

Sexual orientation

2.3.11 The 2021 Census data demonstrates that 88.9% of the population of Bradford are straight or heterosexual – slightly less than the national average of 89.4%. 1.1% of the population are gay or lesbian, and 1% are bisexual. Other sexual orientations account for 0.3% of the population; and 8.8% of the population did not answer questions linked to sexual orientation.

Gender reassignment

2.3.12 The 2021 Census asked a new question: “Is the gender you identify with the same as your sex registered at birth?”. The data shows that 91.7% of the population of Bradford have a gender identity that is the same as their sex registered at birth – slightly less than the national average of 93.5%. The percentage of people with a gender identity different from their sex registered at birth is 0.4% - whereas the national average is 0.2%. The percentage of people responding that are trans women, trans men, and non-binary is slightly higher than the national average for these groups (0.2%).

Pregnancy and maternity

2.3.13 The Population Health Monitoring Group indicates that in 2022 Bradford reported 6,684 live births, and had a fertility rate of 1.8. This is slightly greater than the fertility rate reported for the Yorkshire and the Humber region (1.52), and slightly greater than the fertility rate reported for England (1.49). In 2022 there were 45 recorded stillbirths – the stillbirth rate was 6.7. This is higher than the stillbirth rate for the Yorkshire and the Humber region (4), and England (3.9).

2.3.14 The 2021 Census data shows that 11.1% of households in Bradford are lone parent families with dependent children. This is higher than the average for the Yorkshire and the Humber region (6.9% of households) and the national average (7.2% of households). 16.3% of households are married couples or couples in a civil partnership with dependent children – higher than the regional and national average of 14.4% and 13.1% respectively. Cohabiting

couples with dependent children total 4.4% of households – broadly in line with both the regional and national average of 4.5% and 5.1% respectively.

Crime

2.3.15 In 2025, 67,415 crimes were recorded in Bradford (excluding fraud). This was the second highest amount of recorded crime in the West Yorkshire constabulary area, preceded by Leeds (98,167 crimes excluding fraud). The most common crime type was violence against a person – 30,189 crimes were reported, which accounts for approximately 44.8% of crimes recorded in Bradford in 2025. This is slightly higher than the average across the West Yorkshire constabulary area (approximately 43%). The next most common crime was theft - 16,750 recorded crimes, comprising approximately 24.8% of crimes in Bradford, compared with 27.4% of crimes reported across the West Yorkshire constabulary area.

2.3.16 The Index of Multiple Deprivation (IMD) 'Crime' domain measures the risk of personal and material victimisation, measured at the Lower Super Output Area (LSOA) level. The lower the recorded decile, the greater the level of deprivation – for example, neighbourhoods in the first decile are within the 10% most deprived neighbourhoods nationally, and neighbourhoods within the ninth decile are within the 10% least deprived neighbourhoods nationally. **Figure 2.2** demonstrates that crime deprivation is concentrated within the city centre area, and along the Bingley Road / Bradford Road / Keighley Road transport corridor.

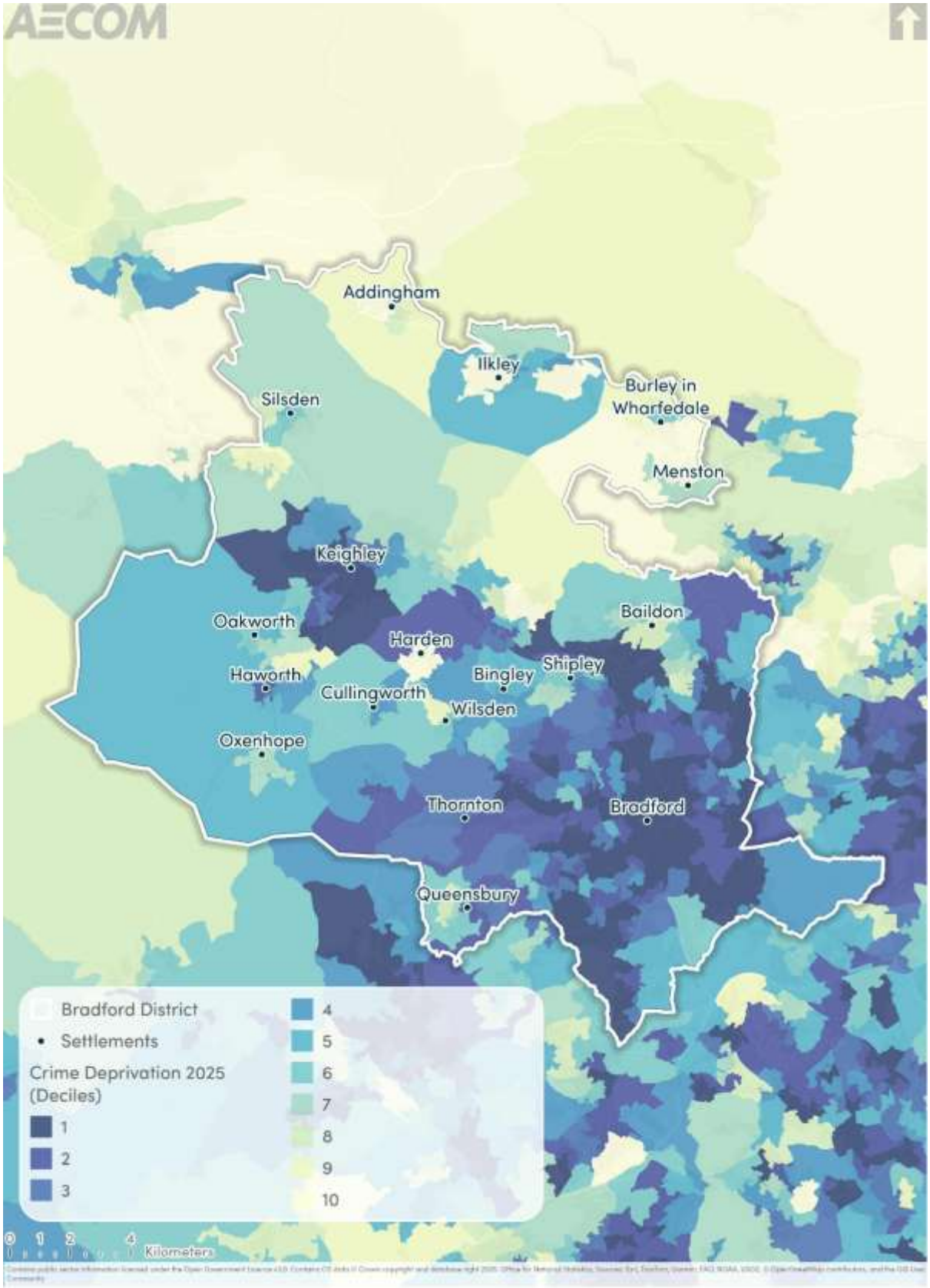


Figure 2.2 Crime deprivation (IMD, 2025) across Bradford

Housing

2.3.17 Figure 2.3 shows the breakdown of accommodation throughout Bradford, using data provided by the Office for National Statistics 2021 Census. 31.9% of accommodation is owned outright (compared to 29.3% in the 2011 Census), and 30.4% is owned with a mortgage or loan or through shared ownership (36.3% in the 2011 Census). Social rent accounts for 14.6% of accommodation (14.8% in the 2011 Census), and private rent or living rent free accounts for 23.1% (19.6% in the 2011 Census). This shows an increase in outright home ownership between the 2011 and 2021 Census data, and an increase in private renting or living rent free.

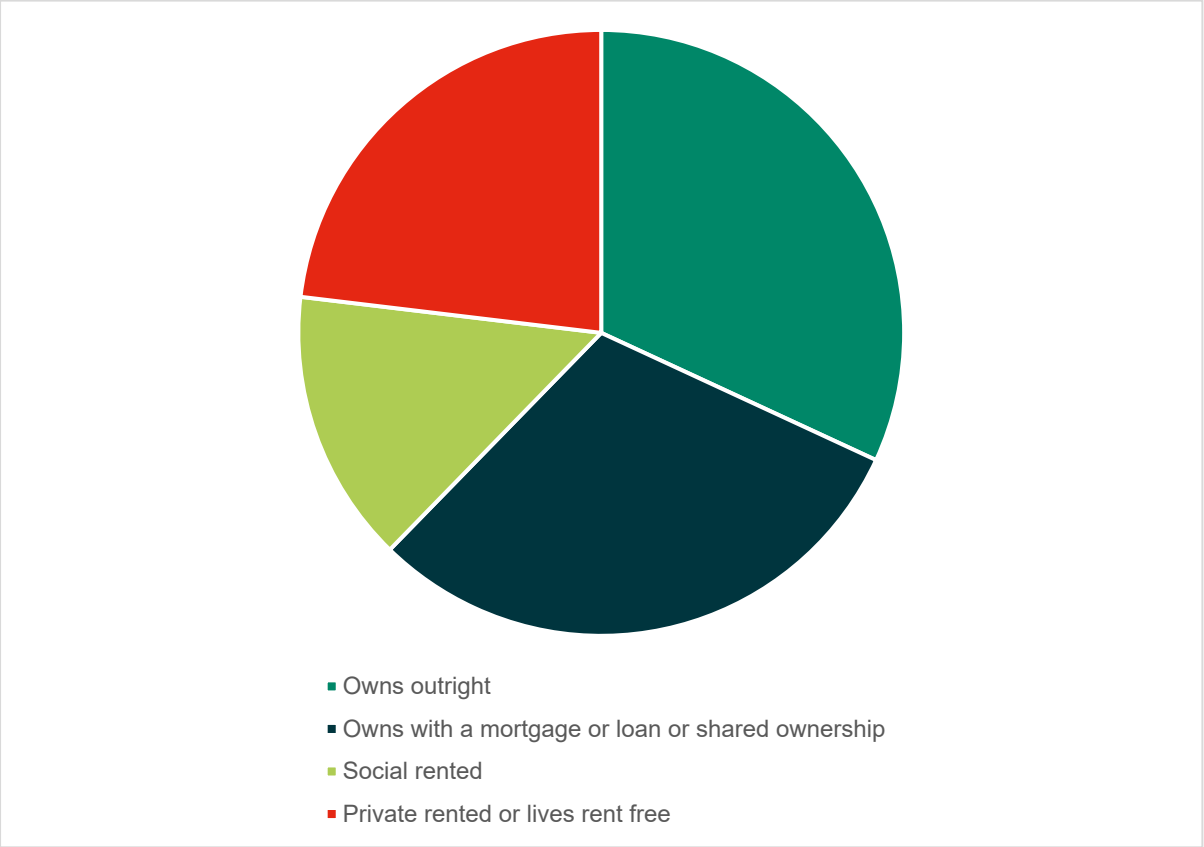


Figure 2.3 Accommodation types in Bradford

2.3.18 According to Bradford 2021 Census data: 30.8% of households in Bradford are one person households; 29.6% are two people household; 14.7% are three people households, and 12.3% are four people households. Households with five or more people in account for 12.6% of households in total.

2.3.19 The dwelling type mix captured in the 2021 Census is as follows, and is compared with the 2011 Census:

- Detached: 30,851 households (14.7%). In 2011 this was 28,381 households (14.2%)
- Semi-detached: 76,995 households (36.6%). In 2011 this was 72,169 households (36.2%).
- Terraced: 69,168 households (33%). In 2011 this was 67,949 households (34.1%).

- In a purpose-built block of flats or tenement: 24,306 households (11.6%). In 2011 this was 24,723 households (12.4%).
- Part of a converted or shared house, including bedsits: 3,390 households (1.6%). In 2011 this was 3,215 households (1.6%).
- Part of another converted building, for example, former school, church or warehouse: 2,769 households (1.3%).
- In a commercial building, for example, in an office building, hotel or over a shop: 1,802 households (0.9%). In 2011 this was 1,527 households (0.8%).
- A caravan or other mobile or temporary structure: 586 households (0.3%). In 2011 this was 472 households (0.2%).

2.3.20 It is noted that 860 households in the 2011 Census were classified as shared dwellings (0.4%), converted buildings such as former schools, churches or warehouses were not considered. There has been an increase in purpose-built blocks of flats and tenements between the 2011 and 2021 Census.

2.3.21 According to data provided by the UK House Price Index, the average house price in Bradford in March 2026 is £186,734. This is an increase of approximately 33.1% compared with September 2018 data. This is greater than the increase in the region over the same time period (approximately 28.2% - £162,009 in 2018 and £207,750 in 2026), and for England (approximately 16.3% - £249,408 in 2018 to £289,946 in 2026). However, housing continues to be more affordable in Bradford when compared to regional and national averages.

2.3.22 Data provided by Action on Empty Homes demonstrates that 9,977 homes were vacant in 2024, which is equal to a 4.5% vacancy rate. This includes council tax paying empty homes, council tax exempt empty homes, and second homes / furnished empty properties. This means that one in every 22 homes is vacant in the District.

2.3.23 According to the latest Annual Monitoring Report 2023 - 2024, 1,419 dwellings were completed in 2023/24. This is an increase from the previous year of 1,044 but is still lower than the annual amount of housing delivered before the Covid-19 pandemic, as well below the Core Strategy housing requirement of 2476 dwellings per annum and the standard method housing need figure of 1870 homes per annum. Housing delivery completed on previously developed land is currently higher than targets outlined in the Core Strategy. However, only 15% of total housing completions in 2023/24 have been affordable housing – lower than the Core Strategy target of 20-25%.

2.3.24 According to the Joint Strategic Needs Assessment Housing and Health report, 46.9% of housing in Bradford was built before 1945, which makes them less energy efficient, trickier to retrofit, and likely to fall into disrepair if not properly maintained. Data suggests that 75% of households in Bradford fall below an Energy Performance Certificate (EPC) rating of C (where A is the highest rating); 24.9% of homes were estimated to fall below the Decent Homes Standard across Bradford in 2020/21; and there are problems with mould and damp in properties.

Broadband

2.3.25 According to ONS data, 95.5% of premises have coverage from a gigabit-capable service (download speeds of 1,000 Mbps or more), which is greater than the UK average of 87.8%. 100% of the Bradford area has 4G coverage from at least one mobile network provider (greater than the UK average of 96.2%), and 99.8% of the area has 5G coverage (greater than the UK average of 72.8%). Only 1.2% of premises do not have access to services above 30Mbps according to ONS data, which is lower than the average of 2% for the UK.

Facilities and services

2.3.26 As shown by Figure 2.4, the main settlements in Bradford are distributed across the area. According to the adopted Core Strategy, Bradford is the regional city of the area (including Shipley and Lower Baildon), and is the focus for development delivery across housing, employment, leisure, retail, education, health and cultural development types. Ilkley, Keighley, and Bingley are principal towns, and have a local focus for development types across the area. Local growth centres are the most sustainable local centres accessible to the larger settlements – Burley in Wharfdale, Menston, Steeton with Eastburn, Silsden, Queensbury and Thornton. There are also several local service centres. It is recognised that residents within and in proximity to these centres are likely to have better access to associated infrastructure, services, and facilities.



Figure 2.4 Settlements in Bradford District

Barriers to housing and services

2.3.27 The Index of Multiple Deprivation (IMD) 'barriers to housing and services' domain measures the physical and financial accessibility of housing and local services. Indicators include housing affordability, overcrowding and proximity to services such as schools and healthcare facilities. The lower the recorded decile, the greater the level of deprivation – for example, neighbourhoods in the first decile are within the 10% most deprived neighbourhoods nationally, and neighbourhoods within the ninth decile are within the 10% least deprived neighbourhoods nationally.

2.3.28 Figure 2.5 overleaf demonstrates that the city centre of Bradford experiences varying levels of deprivation linked to accessing housing and services, with some LSOAs in the north of the city having greater deprivation levels than LSOAs in the south. Deprivation is also experienced more greatly to the north, north-west, and west, where it is slightly more rural.

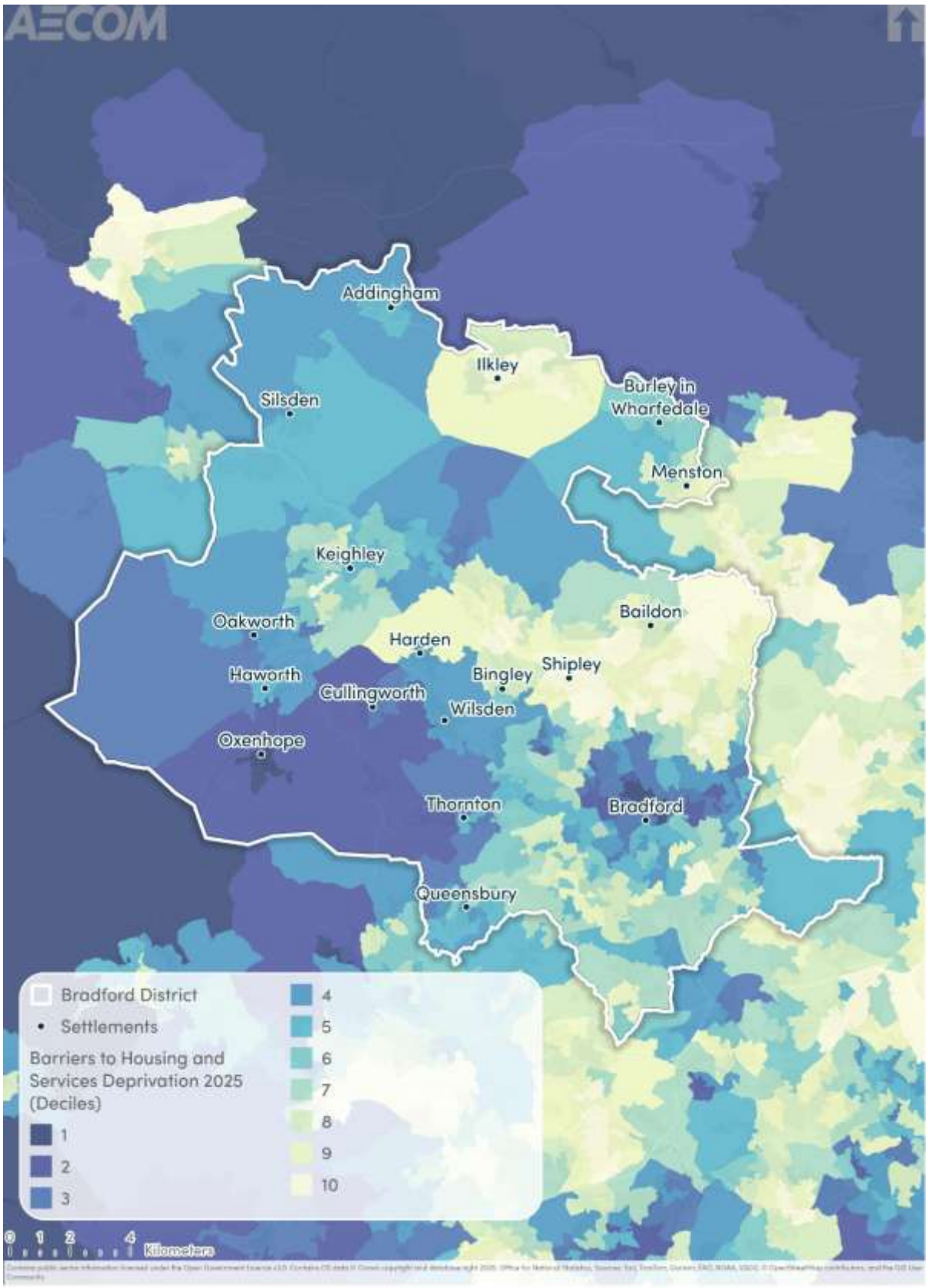


Figure 2.5 Barriers to housing and services deprivation (IMD, 2025) in Bradford

Living environment

2.3.29 The Index of Multiple Deprivation (IMD) 'living environment' domain captures the quality of the local environment, combining measures of indoor quality (housing in poor condition and social and private rented housing in poor condition) and outdoor environmental quality (air quality and road traffic accidents). The lower the recorded decile, the greater the level of deprivation – for example, neighbourhoods in the first decile are within the 10% most deprived neighbourhoods nationally, and neighbourhoods within the ninth decile are within the 10% least deprived neighbourhoods nationally.

2.3.30 Figure 2.6 overleaf demonstrates that Bradford experiences relatively high levels of deprivation linked to the living environment, especially within the city centre environment and within areas to the west.

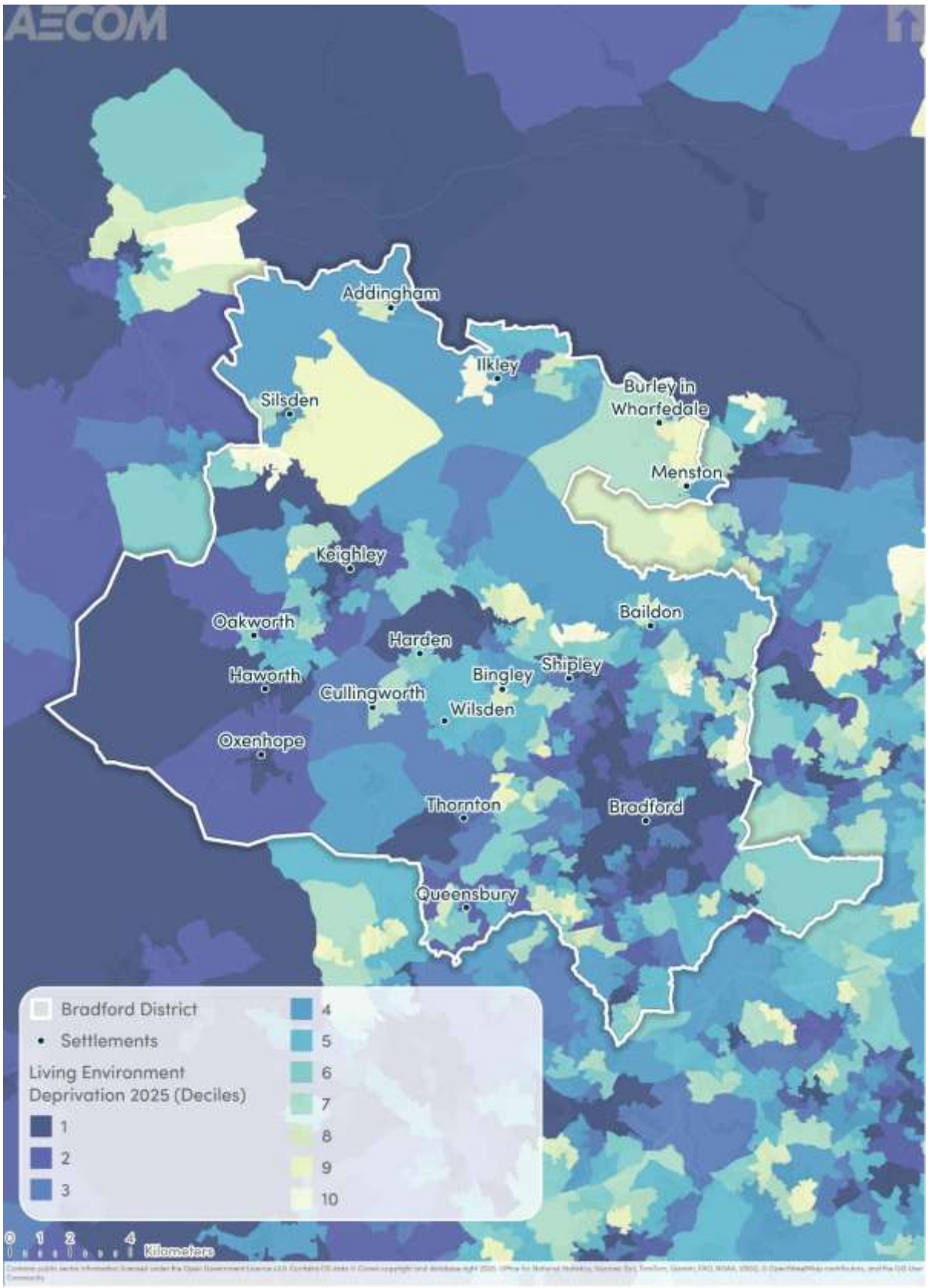


Figure 2.6 Living environment deprivation (IMD, 2025) across Bradford

2.4 Future baseline

2.4.1 The population of Bradford is projected to grow, and whilst there is a greater level of young people in the area, there is also an ageing population. This is likely to influence demand for services and facilities that support healthy lifestyles. This could also impact on the types of housing brought forward – as there could be a greater demand for smaller homes for first time buyers and those who are wishing to downsize or require specialist older person accommodation, as well as the need for homes to be built to accessible and adaptable design standards.

2.4.2 Crime patterns may shift with population growth and socio-economic change.

2.4.3 Housing delivery in Bradford remains lower than anticipated. This combined with increasing house prices is anticipated to further contribute to deprivation linked to accessing housing, as numbers and prices could remain out of reach for a number of residents and demographic groups in Bradford.

2.4.4 Access to services and facilities, and housing, vary across Bradford, which leads to different levels of experienced deprivation at the neighbourhood level. These differences may persist or worsen without coordinated intervention, particularly as population growth increases demand.

2.4.5 Environmental pressures are likely to increase due to development and climate change which could negatively impact access to high quality green and blue infrastructure.

2.5 Key issues

2.5.1 Projected population growth in Bradford could lead to a greater demand on services and infrastructure, which could in turn adversely impact upon experienced deprivation linked to accessing important facilities across the area. The Government's Levelling Up and Regeneration Bill notably seeks to reduce regional inequalities and promote economic growth and opportunities in less prosperous areas. It has been designed to address regional disparities, stimulate economic development, and enhance infrastructure and community well-being in order to create a more balanced and inclusive nation.

2.5.2 National policy and guidance seek to ensure that new housing developments are supported by necessary infrastructure; notably the Planning and Infrastructure Act seeks to streamline the planning process to maximise coordinated housing and infrastructure delivery. This reflects, for example, the Building for a Healthy Life design framework which promotes the delivery of high-quality housing developments with a focus on connectivity, community integration, and sustainability.

2.5.3 Crime rates in Bradford are high; the most common crimes are linked to violence and theft, and there are higher levels of experienced crime within the city centre and along the Bingley Road / Bradford Road / Keighley Road transport corridor. Further development in Bradford could exacerbate crime by potentially bringing forward additional growth within and in proximity to areas that experience greater levels of crime, and encouraging more people into the area to live and work.

2.5.4 However, it is also recognised that there is potential for development to contribute towards safer communities depending on development design - for example, through increasing natural surveillance of streets and roads.

2.5.5 Future growth may put an increased demand on housing supply and affordability in Bradford. Ensuring an appropriate mix of housing types, tenure will become more important to supporting a diverse population in the area. It will also be important to improve the energy efficiency and standards of existing housing stock, so that existing development can more effectively meet the needs of the Bradford population.

2.5.6 The Levelling-up and Regeneration Act 2023 introduces reforms to accelerate the delivery of new homes and infrastructure, aligning with the government's levelling-up agenda. This reflects the latest reforms to the NPPF which aim to refine planning policies to better support housing supply and infrastructure needs. The emerging 10-Year Infrastructure Strategy is also relevant in this respect, ensuring new development is supported by necessary transport, utilities, and social infrastructure.

2.5.7 As more services move online, digital connectivity is becoming an important component of accessibility. It will be important to ensure Bradford retains its high level of connectivity.

2.6 IA objective

2.6.1 Considering the range and breadth of issues identified above, it is proposed that the IA framework should include the following objectives relating to communities, population and housing (the full IA framework including supporting assessment questions is set out in Section 9) :

Sustainable community growth: To ensure that communities have good access to a range of good quality services and connections to wider social, environmental and economic networks.

Housing: To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups

3. Health and inequalities

3.1 Focus of topic

3.1.1 This topic focuses on promoting health, wellbeing, and safety by addressing healthcare access, health inequalities, education, and the quality of the living environment.

3.2 Key sources of information

3.2.1 Table 3.1 presents relevant documents identified through the policy and evidence review carried out for the IA. These sources will be drawn upon through the baseline review and identification of key issues.

Table 3.1 Health and inequalities - key policy and evidence documents

Document Title	Year of Publication
National	
National Planning Policy Framework (NPPF)	2026
Planning and Infrastructure Act	2025
Environment Improvement Plan	2025
10 Year Health Plan for England	2025
Levelling-up and Regeneration Act	2023
Streets for a Healthy Life: A companion guide to Building for a Healthy Life	2022
Building for a Healthy Life	2020
Health Equity in England: The Marmot Review 10 Years On	2020
Health Impact Assessment in Spatial Planning	2020
Planning for Sport Guidance	2019
Healthy High Streets	2018
Spatial Planning for Health: An evidence resource for planning and designing healthier places	2017
Equality Act	2010
Planning Practice Guidance	various
Local	
Bradford Neglect Strategy 2026 - 2028	2026
Bradford Schools Online – Forecast and Place Planning Information (Primary)	2026
Our plans for health, care and wellbeing in Bradford District and Craven	2025
Climate Change: Health and Health Harms Health Needs Assessment	2025
Early Education and Childcare Sufficiency Assessment	2025
Bradford District Strategy 2025-2035	2025

Document Title	Year of Publication
City of Bradford Metropolitan Council Joint Strategic Needs Assessment: Housing and Health	2024
West Yorkshire Combined Authority Transport Strategy 2040	2017
The Northern Powerhouse: One Agenda, One Economy, One North	2015
Bradford Council Tenancy Strategy 2013-2018	2013
West Yorkshire Local Transport Plan 2011-2026	2012
Bradford Local Investment Plan 2011-2020	2011

3.3 Baseline information

Health outcomes

3.3.1 According to the Local Authority Health Profile for Bradford:

- Life expectancy at birth for males in 2025 is 78 years, and for females it is 82.3 years. This is lower than values for Yorkshire and the Humber, and for England.
- Healthy life expectancy (the amount of time a person can expect to be in 'good' or 'very good' health) for males in 2022 – 2024 (the most recent data) was 57.4, and 58.2 for women. This is significantly lower than the national averages (60.9 and 61.3 respectively) and has steadily declined since 2018-2022. However, this is broadly in line with the national trend, which is also steadily declining.
- Inequality in life expectancy at birth (the gap between the most deprived and least deprived areas in years of life lived) for males in 2022-2024 was 12.4, and for women it was 10.2 years. Further discussion on inequalities below (see para 3.2.6).
- The percentage of people aged 18+ and overweight (or obese) in 2024/25 is 64.5%. This is lower than the regional average, and in line with the national average.
- The under 75 mortality rate in Bradford in 2025 was 391 per 100,000. Whilst this is higher than the regional and national average, it does demonstrate a declining trend, signalling an improvement. Death rate due to cardiovascular disease was 102.5 per 100,000(much greater than regional and national averages), and death rate due to cancer was 126.5 per 100,000(in line with regional data and greater than national data). The suicide rate in 2022-24 was 11.4 per 100,000 – lower than the regional average of 12.7, but greater than the national average of 10.9.
- Excess winter mortality (largely caused by cold weather and winter viruses) is similar in Bradford to the England average but higher than 11 of 15 local authority areas most similar to Bradford.
- 12.6% of adults aged 18+ were current smokers in 2024. Admission episodes for alcohol-specific conditions in people aged under 18 years is lower than regional and national averages (between 2021-22 and 2023-24).

- The percentage of physically active adults aged 19 and above in 2024 was 62.1% - less than the regional average of 67% and national average of 68%.

3.3.2 Further, Bradford is increasingly vulnerable to the impacts of extreme heat, particularly in its urban areas where the urban heat island effect can increase exposure to high temperatures. The Bradford Heat and Health Harms Needs Assessment (2025) estimates that approximately 384,050 people (69.5% of the District's population) live in areas experiencing higher levels of heat and are therefore at greater risk of heat-related harm. Older people, those with long-term health conditions, and residents living in densely populated neighbourhoods are particularly vulnerable.

Healthcare facilities

3.3.3 Bradford District is served by an extensive healthcare network, including 69 GP practices, two acute hospital trusts, 68 dental practices and 137 community pharmacies, alongside a range of community health and mental health services. The Pharmaceutical Needs Assessment (2025–2028) concludes that current pharmaceutical provision is sufficient to meet the needs of the District over the lifetime of the assessment, with no identified gaps in pharmacy provision.

Health deprivation

3.3.4 The IMD (2025) measures health deprivation and disability through the risk of premature death and impairment of quality of life through poor physical or mental health. Figure 3.1 overleaf shows the spatial distribution of neighbourhood deprivation across the District. The highest levels of deprivation are located primarily around Bradford city, as well as Keighley. This covers most of the south east of the District, as well as the central areas. The north of the District is comparitively less deprived than the south.

Inequalities

3.3.5 Further, according to the Bradford District Joint Strategic Needs Assessment (JSNA), Bradford District experiences substantial health inequalities, with deprivation being a major determinant of health outcomes. The JSNA identifies long-term conditions, including cardiovascular disease, diabetes, respiratory disease and mental ill health, as key contributors to poor health, alongside increasing levels of multimorbidity. It also highlights the importance of addressing the wider determinants of health, including income, employment, education, housing and the local environment, to reduce inequalities and improve health outcomes across the District. The JSNA adopts four domains of inequality: socio-economic status, geography, protected characteristics, and inclusion health groups, recognising that many individuals experience multiple and intersecting forms of disadvantage.

3.3.6 These inequalities are strongly influenced by deprivation and geography, and health outcomes vary substantially across the district. As highlighted above, the gap in life expectancy at birth between the most and least deprived areas of Bradford during 2022–2024 was 12.4 years for males and 10.2 years for females, demonstrating the significant impact of deprivation on health outcomes.

3.3.7 These inequalities are reflected in higher rates of long-term health conditions, premature mortality and poorer health experienced by residents living in the district's most deprived communities.

3.3.8 The JSNA recognises that some population groups experience disproportionately poorer health and wellbeing outcomes, including people with protected characteristics under the Equality Act 2010 and inclusion health groups who may face multiple and intersecting forms of disadvantage. Addressing these inequalities requires consideration of both place-based and population-based differences to ensure that interventions are targeted where need is greatest.

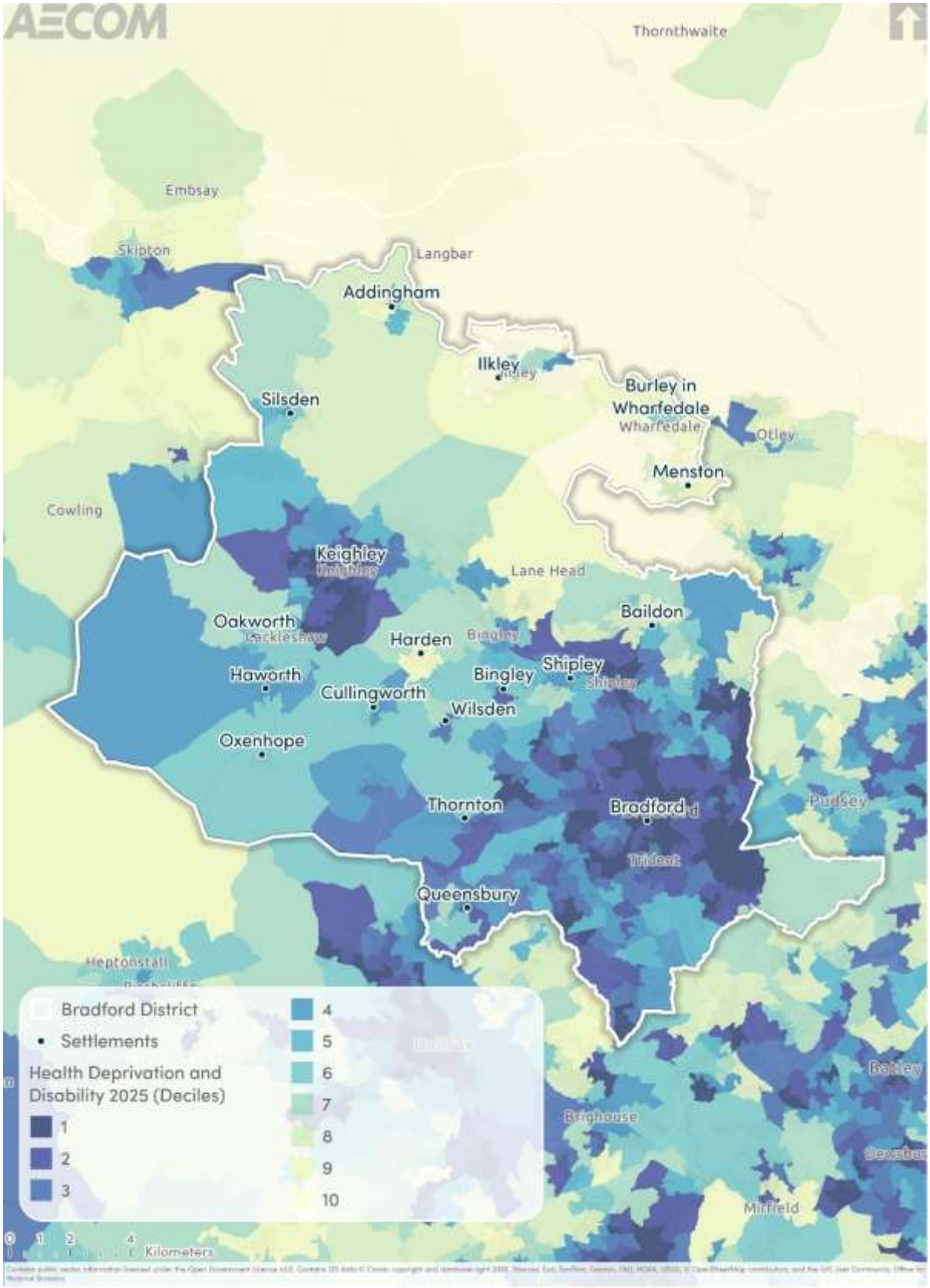


Figure 3.1 Health deprivation (IMD, 2025) across Bradford District

Overall deprivation

3.3.9 Figure 3.2 shows the spatial distribution of deprivation across Bradford District, which is characterised by a strong north–south divide. The most deprived neighbourhoods are concentrated within the urban areas of Bradford, Keighley, Shipley and parts of Bingley and Queensbury, while the least deprived neighbourhoods are predominantly located in the north of the District, particularly around Ilkley, Burley in Wharfedale, Menston, Addingham and surrounding rural areas. Overall, the pattern demonstrates significant inequalities across the District, with pockets of high deprivation interspersed amongst more affluent communities.

3.3.10 According to the City of Bradford Metropolitan District Council Intelligence Bulletin, the 2025 IMD identifies that 115 of Bradford's 312 LSOAs are within the 10% most deprived neighbourhoods in England, home to approximately 217,000 residents (39%), highlighting the concentration of deprivation within parts of the District. Further, as highlighted in the West Yorkshire Index of Multiple Deprivation 2025 Report, five of West Yorkshire's seven neighbourhoods within the bottom 100 most deprived in England are within Bradford. Two are in Holme Wood, two located in Great Horton and Brackenhill, and one in Keighley Central and East. These have also been highlighted on Figure 3.2 in red. Two broad areas are located on the periphery of Bradford city, and one locater central to Keighley.

3.3.11 Bradford has been noted as one of the most persistently deprived Districts over the course of the five Indices of Deprivation updates (since 2004).

Education

3.3.12 Figure 3.3 shows that the spatial distribution of education and skills deprivation broadly reflects the overall pattern of multiple deprivation across Bradford District. The highest levels of education and skills deprivation are concentrated within the urban areas of Bradford, Keighley, Shipley and parts of Bingley, with additional pockets in the south of the District. In contrast, the least deprived areas are predominantly located in the north of the District, including Ilkley, Burley in Wharfedale, Menston, Addingham and surrounding rural areas. This distribution highlights marked spatial inequalities in educational attainment, skills and training opportunities across the District, with the greatest challenges concentrated in the main urban centres.

3.3.13 Figure 3.4 shows educational facilities from infant school through to university across Bradford district.

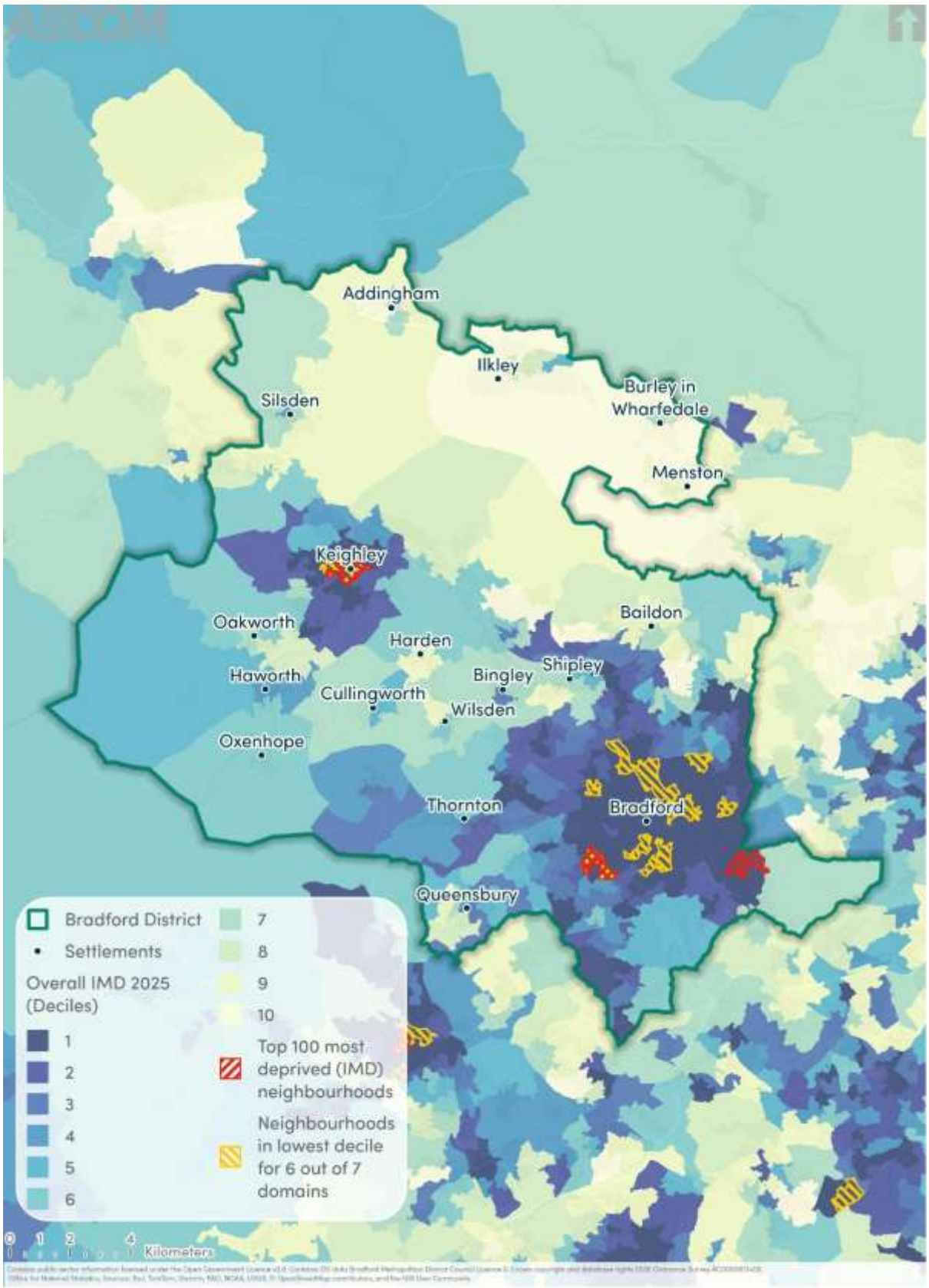


Figure 3.2 Overall IMD (2025), top 100 most deprived neighbourhoods, and neighbourhoods in lowest decile for 6 of 7 domains across Bradford District

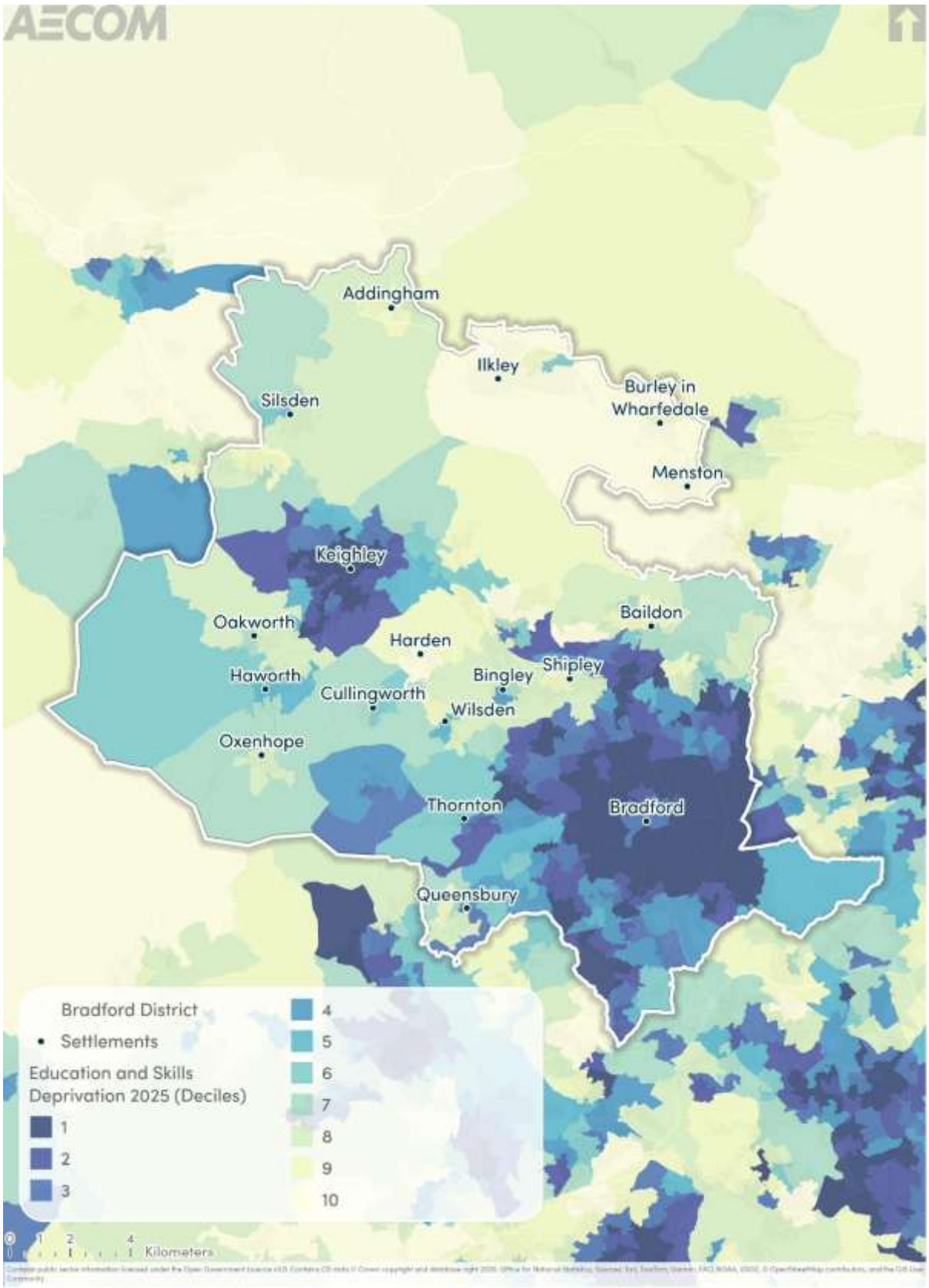


Figure 3.3 Education and skills deprivation (IMD, 2025) across Bradford District

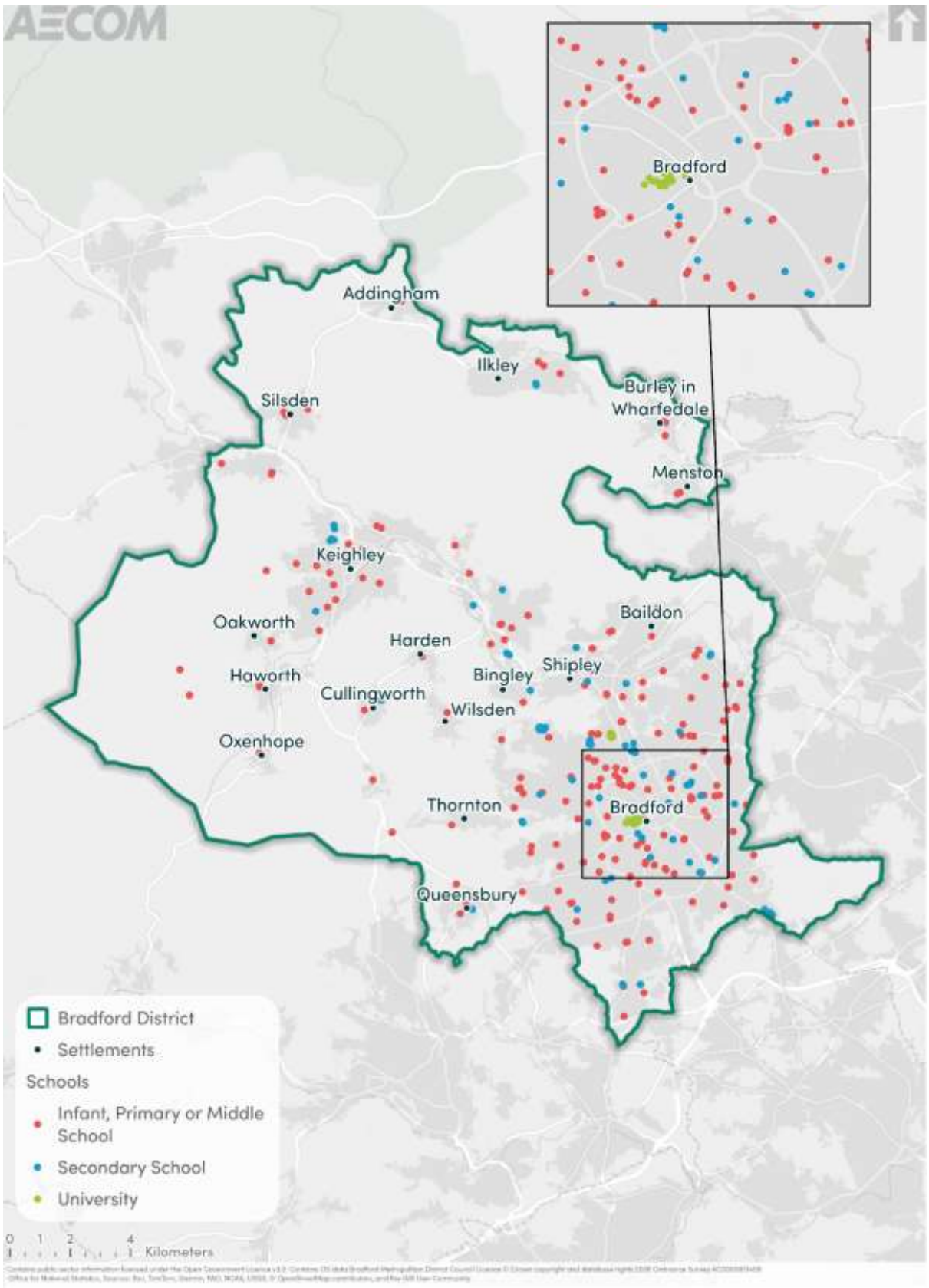


Figure 3.4 Educational facilities in Bradford district

3.4 Future baseline

3.4.1 Bradford District is expected to experience continued population growth and demographic change over the plan period, resulting in increased demand for healthcare services, social care and community infrastructure. Alongside an ageing population, the prevalence of long-term conditions, including cardiovascular disease, diabetes, respiratory illness and mental ill health, is likely to increase, placing additional pressure on existing health services. Whilst current healthcare provision is considered sufficient to meet existing needs, future growth will require continued investment to ensure healthcare infrastructure remains accessible and capable of meeting demand.

3.4.2 Without intervention, existing health and wider socioeconomic inequalities are likely to persist. Significant disparities in deprivation, education and skills, employment, housing and health outcomes remain evident across the District, with these factors continuing to influence life expectancy, levels of preventable disease and overall quality of life. Population growth, demographic change, increasing housing costs and wider economic pressures could exacerbate existing inequalities, particularly for more deprived communities and vulnerable population groups.

3.4.3 District-wide averages can mask substantial local variations in deprivation, health outcomes and access to opportunities, highlighting the importance of considering place-based inequalities. There is also a risk that new development could reinforce existing spatial inequalities if access to housing, employment, healthcare, education, green infrastructure and sustainable transport is not improved across all parts of the District. Consequently, the Local Plan has an important role in promoting inclusive growth and ensuring that development contributes to reducing, rather than exacerbating, inequalities.

3.4.4 National planning and health policy, including the NPPF, the NHS Long Term Plan, the Environmental Improvement Plan (EIP) and the Health Mission set out in the Government's Plan for Change, seeks to reduce health inequalities and improve health outcomes through the creation of healthy, inclusive and sustainable communities. Consequently, there is significant potential for the Local Plan to influence future health outcomes by directing development to sustainable locations, improving access to healthcare and community facilities and open spaces, enhancing green and blue infrastructure, and addressing the wider determinants of health, including housing, education, employment and access to services. As such, the Bradford Local Plan presents opportunities to increase physical and recreational activity, to the benefit of healthier lifestyles and personal health, though it is recognised that this is dependent on the policies taken forward and the design of potential development.

3.5 Key issues

3.5.1 Despite improvements in educational attainment, qualification levels among Bradford's working age population are lower than the regional and national averages, particularly within the more deprived urban areas. 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.

3.5.2 The general health of Bradford District's population tends to be poorer than other parts of the country. This is particularly the case in more deprived areas. The main causes of death in Bradford 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 of an increase in life expectancy; although it remains lower than average. It also varies across the area, depending on where people live.

3.5.3 Significant inequalities in health outcomes persist across the district, with a life expectancy gap of 12.4 years for males and 10.2 years for females between the most and least deprived areas. Health inequalities are closely linked to wider determinants of health, including deprivation, employment, education, housing quality, environmental conditions and access to services.

3.5.4 Some communities and population groups experience multiple and intersecting forms of disadvantage, meaning that the Local Plan should consider the potential for differential effects on protected and vulnerable groups.

3.5.5 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 to problems with ill health. Therefore, it will be important for policies to ensure that opportunities are provided for local people, to encourage participation in physical activity, in order to improve health and wellbeing in the area.

3.5.6 Bradford District is notably deprived, and has variable levels of deprivation spatially. There are higher levels of deprivation linked to crime and education, skills and training domains. Additionally, the District is the 4th most deprived in relation to income, and the 5th most deprived in relation to employment. Other key deprivation measures show elevated 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 those in more deprived neighbourhoods, as well as support community cohesion.

3.6 IA objectives

3.6.1 Considering the range and breadth of issues identified above, it is proposed that the IA framework should include the following objectives relating to health and equalities (the full IA framework including supporting assessment questions is set out in Section 9):

Equalities: To support equality and diversity, whilst promoting social cohesion, encouraging participation and improving the quality of life (particularly in deprived neighbourhoods).

Health and wellbeing: 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.

Health and wellbeing: To create good cultural, leisure and recreation activities available to all.

Health and wellbeing: To improve safety and security for people and property.

4. Economy

4.1 Focus of topic

4.1.1 This topic focuses on improving the economic wellbeing of Bradford by supporting diverse employment opportunities, enhancing workforce skills, and addressing challenges like qualification gaps and the changing nature of work.

4.2 Key sources of information

4.2.1 **Table 4.1** presents relevant documents identified through the policy and evidence review caried out for the IA. These sources will be drawn upon through the baseline review and identification of key issues.

Table 4.1 Economy - key policy and evidence documents

Document Title	Year of Publication
National	
National Planning Policy Framework (NPPF)	2026
UK's Modern Industrial Strategy	2025
Get Britain Working White Paper	2024
Planning Practice Guidance	various
Local	
Bradford 2025 UK City of Culture 2025 – Interim Evaluation Report	2026
Built Different Bradford 2025-2035	2025
Economic Strategy for Bradford District 2018-2030	2017

4.3 Baseline summary

Key businesses and economic drivers

4.3.1 Bradford's economy is diverse, and strongly characterised by manufacturing, retail, and service industries – though it does also feature financial, healthcare, and technological services. The city has experienced an increase in start-ups, which contributes towards job creation and economic vitality. Dominant players shaping the economic landscape and growth trajectory of Bradford include (but are not limited to):

- Bradford City Football Club.
- Yorkshire Water.
- Bradford College.
- University of Bradford.
- Wm Morrison Supermarkets.
- Farrar Scientific.

4.3.2 Bradford's designation as the UK City of Culture 2025 has acted as a catalyst for investment and regeneration across the city centre. The programme has supported the delivery of new cultural venues, improvements to public spaces, restoration of heritage assets and investment in arts, events and creative industries, helping to enhance the city's cultural offer and visitor economy. It has also attracted public and private sector investment, increased national and international profile, and created opportunities to stimulate economic growth. Beyond the city centre, the programme has sought to engage communities across the District through cultural events and activities, helping to celebrate Bradford's diverse heritage and strengthen community participation.

4.3.3 Figure 4.1 shows regeneration areas proposed through the emerging Local Plan.

4.3.4 According to Nomis 2021 Census data on enterprises by industry and employment size band, there were 16,800 businesses in Bradford in 2025. 14,970 of these were micro (0-9 employees) and 1,505 were small (10-49 employees). 260 businesses were medium sized (50-249 employees), and 70 were large (250 employees or more).

Qualifications

4.3.5 According to the Office for National Statistics 2021 Census data, 24% of people aged 16 and over have no qualifications in Bradford. This is higher than the regional average of 20.6% and the national average of 18.1%. 40.3% have Level 1, 2 or 3 qualifications, compared with 41.1% regionally and 39.9% nationally, and 5.4% have undertaken or are participating in an apprenticeship (compared with 6.1% regionally and 5.3% nationally). People with Level 4 qualifications and above comprise 27.4% of people aged 16 and above in Bradford – significantly lower than the national average of 33.9%, and lower than the regional average of 29.5%. 2.9% of people in Bradford have other qualifications, broadly in line with national averages of 2.8% and regional averages of 2.6%.

Employment deprivation

4.3.6 The Index of Multiple Deprivation (IMD) 'employment' domain measures the proportion of the working-age population involuntarily excluded from the labour market.

4.3.7 Figure 4.2 overleaf demonstrates that the city of Bradford, its outskirts, and the town of Keighley experience great levels of deprivation linked to employment. LSOAs in the more rural parts of Bradford experience lower levels of deprivation linked to employment, however this may also reflect a lower population in these areas when compared to built up areas.

Income deprivation

4.3.8 The Index of Multiple Deprivation (IMD) 'income' domain measures the proportion of the population experiencing low income deprivation.

4.3.9 Figure 4.3 demonstrates that income deprivation is greater within the city of Bradford, and on its outskirts, as well as the town of Keighley. Like the employment deprivation domain, the LSOAs in the more rural parts of Bradford experience lower levels of deprivation.

4.3.10 The income deprivation affecting children index (IDACI) indicates that Bradford ranks as 22nd most deprived local authority in England. This index measures the proportion of all children aged 0-15 living in income deprived families.

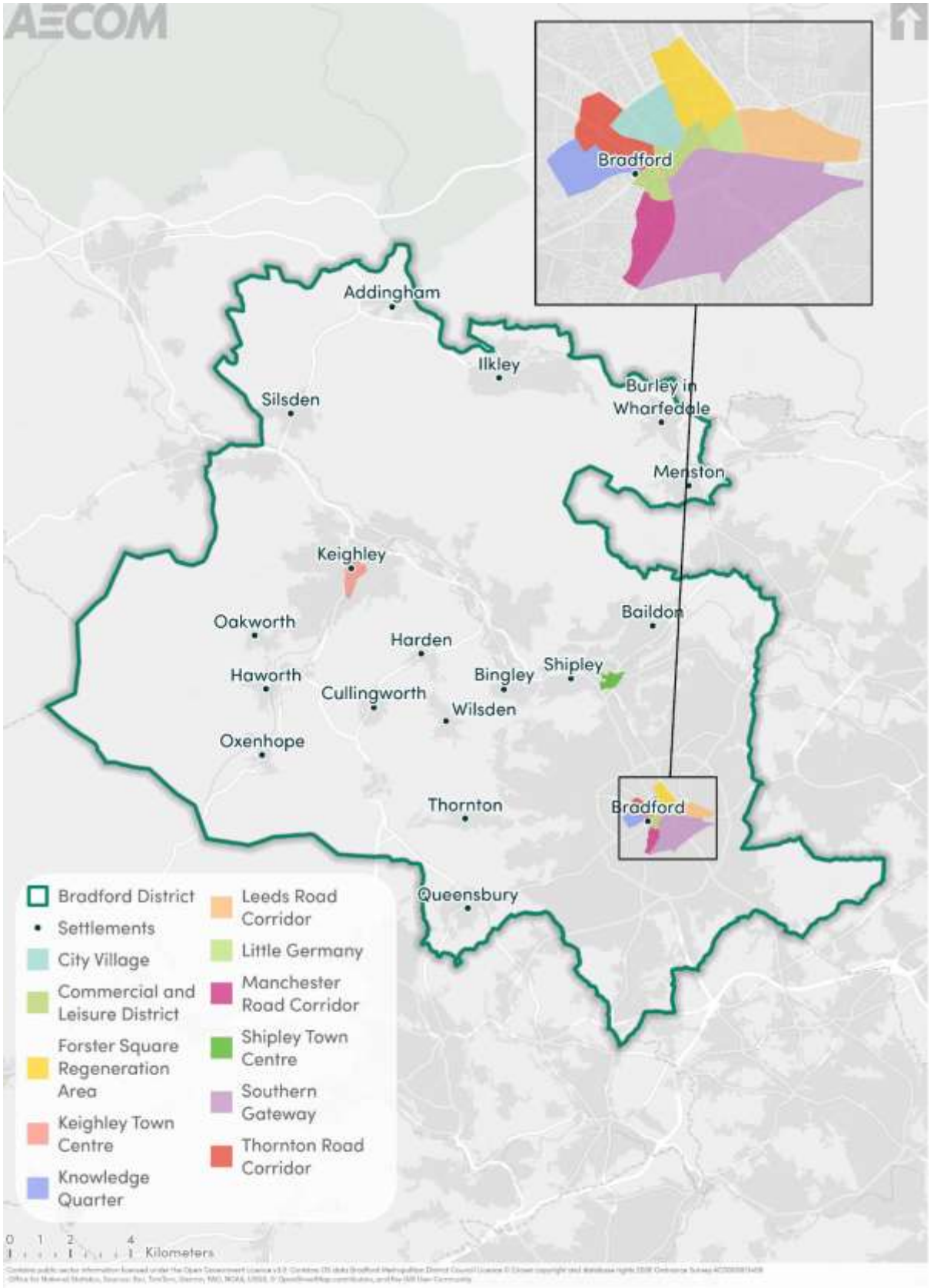


Figure 4.1 Proposed regeneration areas in Bradford

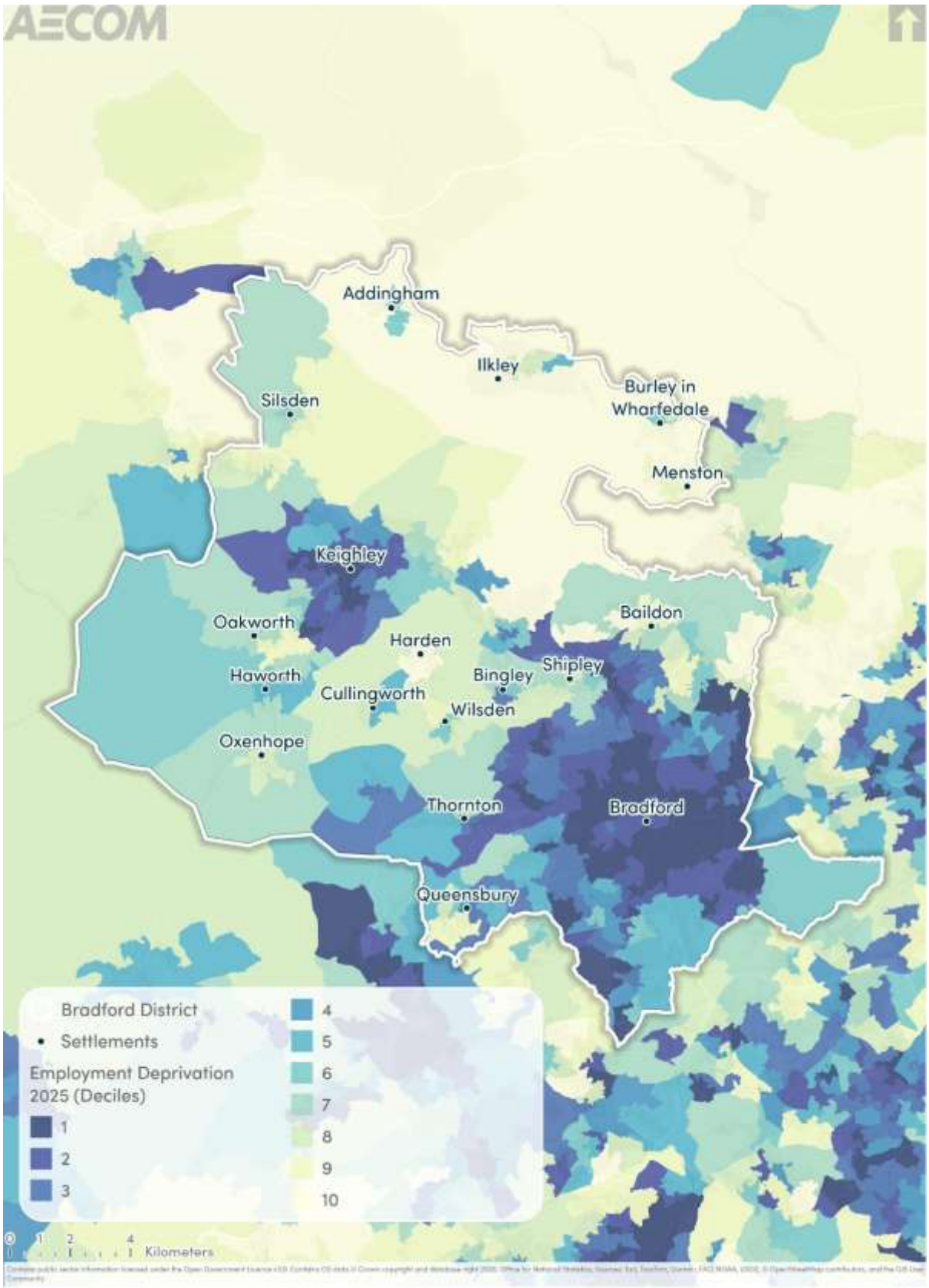


Figure 4.2 Employment deprivation (IMD, 2025) across Bradford

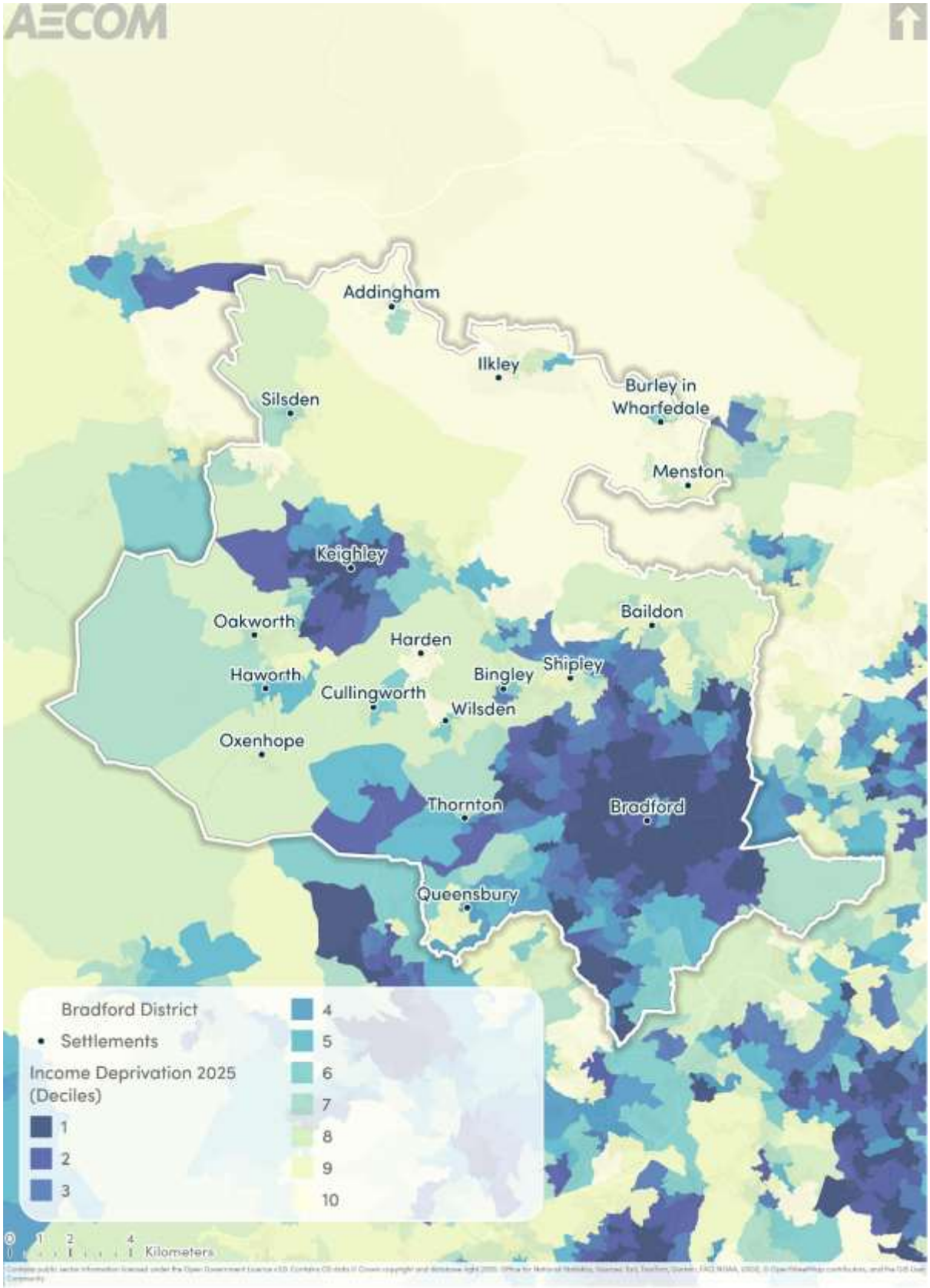


Figure 4.3 Income deprivation (IMD, 2025) across Bradford District

Occupation

4.3.11 According to the Office for National Statistics 2021 Census data, as shown in **Table 4.2,** the largest occupation group in Bradford are the professional occupations – though it is recognised that this is still lower than regional and national averages. There are greater amounts of administrative and secretarial occupations in Bradford when compared to regional and national averages – and the same applies to caring, leisure and other service occupations; sales and customer service occupations; process, plant and machine operatives; and elementary occupations.

Table 4.2 Employment by occupation (aged 16 and above and in employment)

	Bradford	Yorkshire and the Humber	England
Managers, directors and senior officials	10.0%	11.2%	12.9%
Professional occupations	17.1%	18.1%	20.3%
Associate professional and technical occupations	11.5%	12.3%	13.3%
Administrative and secretarial occupations	9.7%	9.0%	9.3%
Skilled trades occupations	10.4%	11.1%	10.2%
Caring, leisure and other service occupations	10.7%	9.7%	9.3%
Sales and customer service occupations	9.1%	8.3%	7.5%
Process, plant, and machine operatives	9.5%	8.4%	6.9%
Elementary occupations	12.0%	11.8%	10.5%

Earnings

4.3.12 According to Office for National Statistics 2021 Census data, the average weekly earnings in Bradford are lower than the regional and national average. Additionally, there is an approximate 13% difference in weekly earnings for full time male and female employees in Bradford; this is greater than the regional difference of approximately 12.7%, but smaller than the national average of approximately 17.4%.

Table 4.3 Earnings in Bradford compared to regional and national data

	Bradford	Yorkshire and The Humber	England
Gross weekly pay (all workers)	£636.70	£684.80	£768.70
Male workers (full time)	£822.40	£885.20	£999.80
Female workers (full time)	£722.10	£753.10	£839.80

Labour rate statistics

4.3.13 The latest labour market statistics available for Bradford indicate that in 2023 the employment rate of people aged 16 to 64 was 69.7% - a decrease from the previous year of 70.5%. It is also recognised that the employment rate across the Yorkshire and The Humber region decreased between 2022 and 2023 by 0.4%. Unemployment rates within Bradford also increased between 2022 and 2023 – from 4.8% to 5%. This was the highest unemployment rate in the region. Comparatively, there was a decrease in the unemployment rate for the Yorkshire and The Humber region for the same time period – from 3.6% to 3.4%. However, it is noted that the economic inactivity rate for 16 to 64 year olds decreased from 25.4% in 2022 to 24.9% in 2023.

4.3.14 Additionally, the latest labour market statistics highlight that the claimant count in Bradford increased in March 2024 in comparison to March 2023 data – from 22,300 claimants to 24,900 claimants, an increase of approximately 11.7%. The proportion of 16 to 64 year olds claiming unemployment-related benefits was 7.3% in March 2024 – an increase from 6.6% in March 2023.

Employment land

4.3.15 The latest available annual monitoring report indicates that between 2013 and 2023-24, 46.18 hectares of employment land and 126,372 square metres of additional employment floorspace have been built out. The adopted Core Strategy identifies a requirement of at least 135 hectares of employment land to be developed between 2013 and 2030 – and as such, approximately 88.82 hectares of development is needed to meet the requirement. However, it is recognised that a significant proportion of employment land from existing, undeveloped allocated employment sites may not be suitable and / or developable. As such, there is a shortfall of employment land in Bradford to meet the Core Strategy requirement. However, the requirement figure and the proposed allocations are being reviewed as part of the Emerging Local Plan.

4.3.16 It is recognised that Bradford has a high proportion of empty homes, as reported in the media. However, business owners and residents have highlighted that the City of Culture year provided a boost. The high streets catchment data tool provided by Centre for Cities indicates that shop vacancies in Bradford are above city centre averages for the UK's 62 largest cities and towns. Additionally, it indicates that in 2025 Bradford's resident spend in other city centres or large shopping centres was above the city centre average – and the most popular destination was Leeds.

Regeneration opportunities

4.3.17 It is recognised that there are multiple regeneration areas and opportunities within Bradford. This includes the Southern Gateway, a 126 hectare site to the south of Bradford city centre which is anticipated to bring forward additional space for employment, as well as new homes, community facilities and green spaces. It also includes two landmark transport investments – a new city centre rail station, and the Bradford to Leeds tram scheme.

4.4 Future baseline

4.4.1 Bradford's economy is likely to remain diverse, with manufacturing, retail and service industries continuing to play an important role in employment and economic activity. The number of micro and small businesses in Bradford suggests that the area will remain popular for entrepreneurship and business start-ups, which could remain key drivers of economic growth.

4.4.2 In the absence of improvements in skills and educational attainment, Bradford is likely to continue to experience lower qualification levels than regional and national averages. The relatively high proportion of residents with no qualifications and the lower proportion of residents holding Level 4 qualifications and above could constrain the growth of higher-skilled sectors and limit the District's ability to attract a variety of businesses and investment opportunities. This may influence the types of employment opportunities available locally, and reinforce demand for lower skilled jobs in Bradford.

4.4.3 Whilst economic inactivity has shown signs of improvement in Bradford, unemployment and claimant counts have increased in recent years. Without further job creation and workforce development initiatives, Bradford may continue to experience employment rates below regional averages and relatively high levels of unemployment and benefit dependency.

4.4.4 Bradford city centre and other town centres may continue to experience above-average retail vacancy rates and expenditure leakage to competing centres, particularly Leeds. However, recent investment and the legacy of the City of Culture programme could provide opportunities to strengthen visitor numbers, business confidence and town centre vitality if supported by ongoing regeneration initiatives.

4.4.5 Regeneration projects are anticipated to contribute towards the economy by providing additional employment opportunities through attracting additional businesses into the area. Regeneration also provides an opportunity to improve access to jobs and training opportunities through increased connectivity.

4.5 Key issues

4.5.1 Bradford has lower qualification levels than regional and national averages. Only 27.4% of residents hold Level 4 qualifications or above, while 24% have no qualifications, which may limit access to higher-skilled employment and investment opportunities. As such, there is a relatively high proportion of residents employed in lower-skilled occupations, and lower concentrations of professional and managerial occupations.

4.5.2 A large proportion of neighbourhoods in Bradford and Keighley experience high levels of employment and income deprivation. This is likely linked to falling employment rates in the area, and due to average earnings being lower than regional and national averages. Bradford also ranks among the most deprived authorities in England for child income deprivation, indicating persistent socio-economic challenges.

4.5.3 Although Bradford has a diverse economy and strong entrepreneurial base, the local economy is heavily dominated by micro and small businesses. Supporting business growth and expansion will be important to increase higher-value employment opportunities.

4.5.4 Regeneration is a key priority across the District (see Figure 4.1), with significant investment presenting opportunities to improve the economy, townscape, public realm and community wellbeing. Ensuring that the benefits of regeneration are delivered sustainably and are shared across all communities will be an important consideration for the emerging Local Plan.

4.5.5 There is an identified shortfall in employment land and uncertainty over the deliverability of some allocated sites. This could restrict future business growth and inward investment if additional employment land is not brought forward. This is of concern given that Bradford city centre experiences higher-than-average retail vacancy rates and a significant loss of retail spending to competing centres, particularly Leeds.

4.6 IA objectives

4.6.1 Considering the key issues discussed above, it is proposed that the IA should include the following objectives in relation to economy (the full IA framework including supporting assessment questions is set out in Section 9):

Economy and employment: Increase the number of additional jobs delivered, particularly for high-skilled/paid employment opportunities.

Economy and employment: Ensure that job opportunities are suited to the needs of the local workforce across all age groups, as well as providing new opportunities for training and education.

Economy and employment: Deliver economic growth through attracting significant investment to provide new/enhanced employment floor space, new development within regeneration areas and town centres, as well as through the expansion of existing businesses.

5. Natural environment

5.1 Focus of topic

5.1.1 This topic focuses on the landscape character and quality of Bradford, as well as its biodiversity value and connectivity. There is also a focus on Green Belt land, mineral resources, and flood risk.

5.2 Key sources of information

5.2.1 Table 5.1 presents relevant documents identified through the policy and evidence review carried out for the IA. These sources will be drawn upon through the baseline review and identification of key issues.

Table 5.1 Natural environment - key policy and evidence documents

Document Title	Year of Publication
National	
Management plans for Protected Landscapes in England	2025
Environment Improvement Plan	2025
UK Biodiversity Framework	2024
Protected Landscapes Targets and Outcomes Framework	2024
Natural England Green Infrastructure Framework	2023
Biodiversity Net Gain Guidance	2023
UK (third) National Adaptation Programme 2023 to 2028	2023
UK Climate Change Risk Assessment	2022
National Model Design Code	2021
The Environment Act	2021
National Flood and Coastal Erosion Risk Management Strategy	2020
Conservation of Habitats and Species (Amendment) (EU Exit) Regulations	2019
Conservation of Habitats and Species Regulations	2017
Flood and Water Management Act	2010
UK Climate Change Act	2008
Wildlife and Countryside Act	1981
Local	
Bradford Landscape Character Assessment Supplementary Planning Document	2026
A Woodland Strategy for Bradford District	2012
Leeds City Region Green Infrastructure Strategy	2010
Nature Conservation Strategy for Bradford – Nature and People	
The Yorkshire Dales National Park Management Plan 2025-2030	
Nidderdale National Landscape Management Plan 2025-2030	

5.3 Baseline summary

Landscape designations

5.3.1 The Yorkshire Dales National Park is adjacent to the boundary of Bradford, to the north of Addingham. Designated in 1954 in recognition of its wildlife habitats, rich cultural heritage, and opportunities for outdoor recreation, the National Park's special qualities include:

- Dry-stone walls and fields barns.
- Spectacular waterfalls.
- Yorkshire Three Peaks.
- Cycling in The Dales.
- Flower-rich upland hay meadows.
- Limestone scenery.
- Extensive caving area.
- Dark skies.
- Moorland in the dales.
- Livestock farming.

5.3.2 The Nidderdale National Landscape also adjoins the Bradford boundary to the north, within proximity to Burley in Wharfedale, and Ilkley. It is designated for its landscape value, wildlife quality, and cultural heritage offering.

5.3.3 The location of these designations is shown in Figure 5.1.

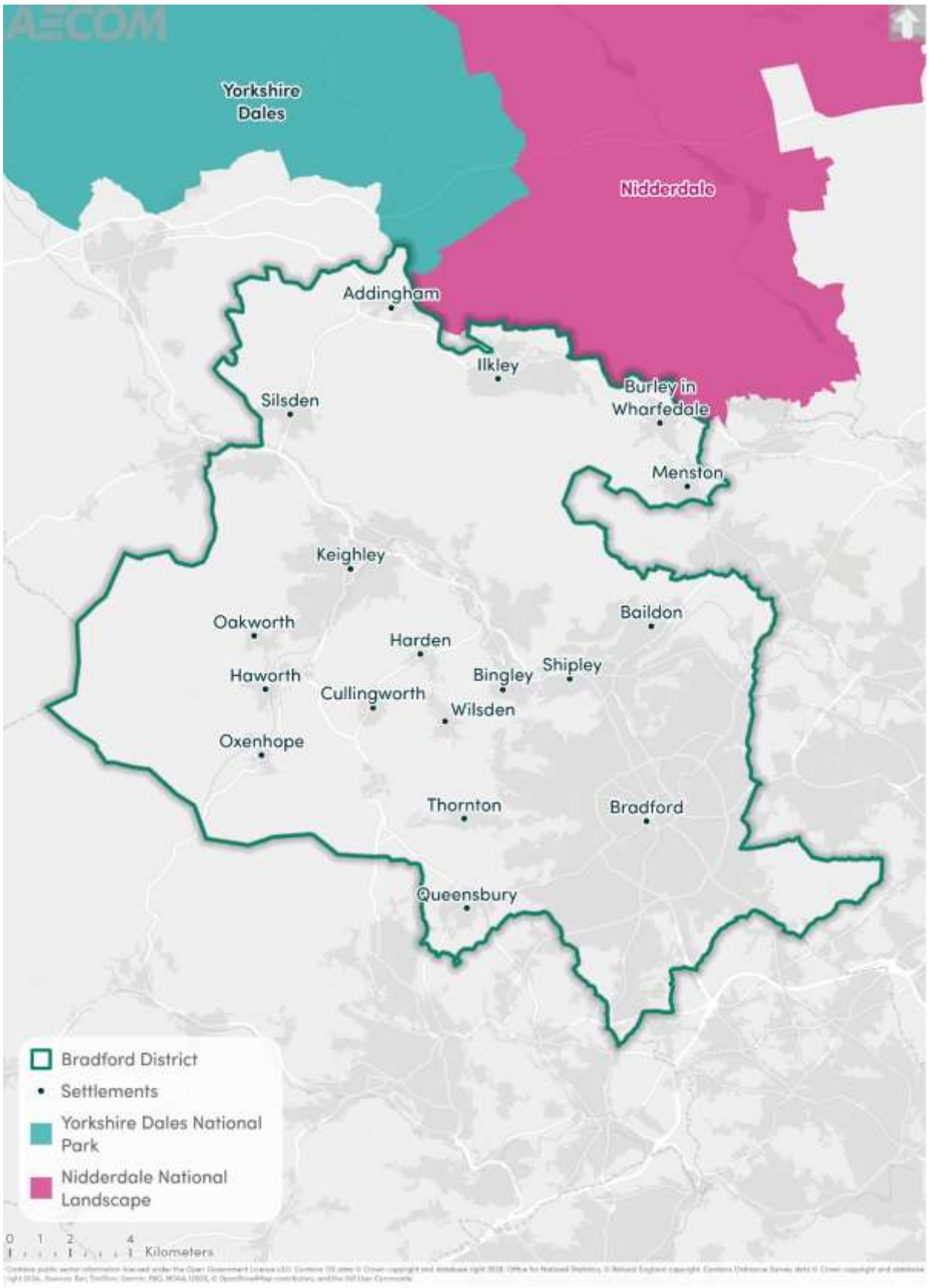


Figure 5.1 Landscape designations in proximity to Bradford District

Landscape character

5.3.4 Bradford intersects with three National Character Areas, as defined by Natural England. These are:

- National Character Area 36 - Southern Pennines: part of the Pennine ridge of hills, this is a landscape of large-scale sweeping moorlands, pastures enclosed by drystone walls, and gritstone settlements contained within narrow valleys. The area contains internationally important moorland habitats that support rare birds such as merlin, short-eared owl and twite, and the peat soils store significant volumes of carbon. With its high rainfall and impervious rocks it is an important area for water supply. The Southern Pennines are also important for recreation due to the extensive open access areas and footpaths, and the sense of escapism they offer, along with the ease of access from large towns.
- National Character Area 37 - Yorkshire Southern Pennine Fringe: a transitional landscape from the upland areas of the Southern Pennines NCA in the west through to the low-lying land of the Nottinghamshire, Derbyshire and Yorkshire Coalfield NCA to the east. The landscape is dominated by industrial buildings and structures such as factories, chimneys, railways and canals. The World Heritage Site of Saltaire stands as an example model town built with the wealth produced by the industries prevalent in this area. In the east, settlements are separated by areas of arable farming with hedgerows and lowland meadows.
- National Character Area 38 - Nottinghamshire, Derbyshire and Yorkshire Coalfield: an area that has seen great change over the past few centuries. Deposits of coal and iron, along with the water supply, brought large scale industry to the area – and the impact of built development on the landscape is evident. It is a generally low-lying area, with hills and escarpments above wide valleys. The landscape embraces major industrial towns and cities as well as villages and countryside. Over half of the NCA (64%) is Green Belt, maintaining an important distinction between settlements.

5.3.5 The NCA overlap is presented in Figure 5.2.



Figure 5.2 National Character Areas that make up Bradford District

5.3.6 The Bradford Landscape Character Assessment Supplementary Planning Document was published in 2026, and divides the District into eight distinct landscape character types (and their sub-areas) based upon:

- Geology, soils, topography and drainage.
- Semi-natural habitats and tree cover.
- Land use and field patterns.
- Cultural associations and historic landscape.
- Settlement and transport patterns.
- Access and recreation.
- Views and perceptual qualities.

5.3.7 Each distinct landscape character type and their sub-areas experienced pressures and forces for change. This includes:

- Climate change.
- Agricultural change.
- Development.
- Habitat management and environmental initiatives.
- Heritage at risk.
- Tourism, recreation and access pressure.
- Pollution, littering, and antisocial behaviour.

Green Belt

5.3.8 Much of the Bradford area is within the South and West Yorkshire Green Belt, as demonstrated through Figure 5.3. It is designated to prevent the uncontrolled growth and potential merging of settlements, to safeguard the countryside, and to preserve the setting and special character of settlements. Green Belt designations can also encourage urban regeneration by encouraging the redevelopment of brownfield sites within settlement boundaries. The South and West Yorkshire Green Belt also has agricultural, landscape, nature conservation, and public access and recreation importance.

5.3.9 The NPPF and associated Planning Practice Guidance require local planning authorities, where Green Belt review is necessary, to assess and identify grey belt land as part of the plan-making process. The August 2026 NPPF defines grey belt as:

"… land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2."

5.3.10 Since the introduction of grey belt land, plans have been approved on land despite receiving objections from the community – including a 295 home plan.

5.3.11 The Council has commissioned a new / updated Green Belt Assessment to support the Local Plan, and this will be taken into consideration through the IA in the identification of reasonable alternatives and assessment of effects.

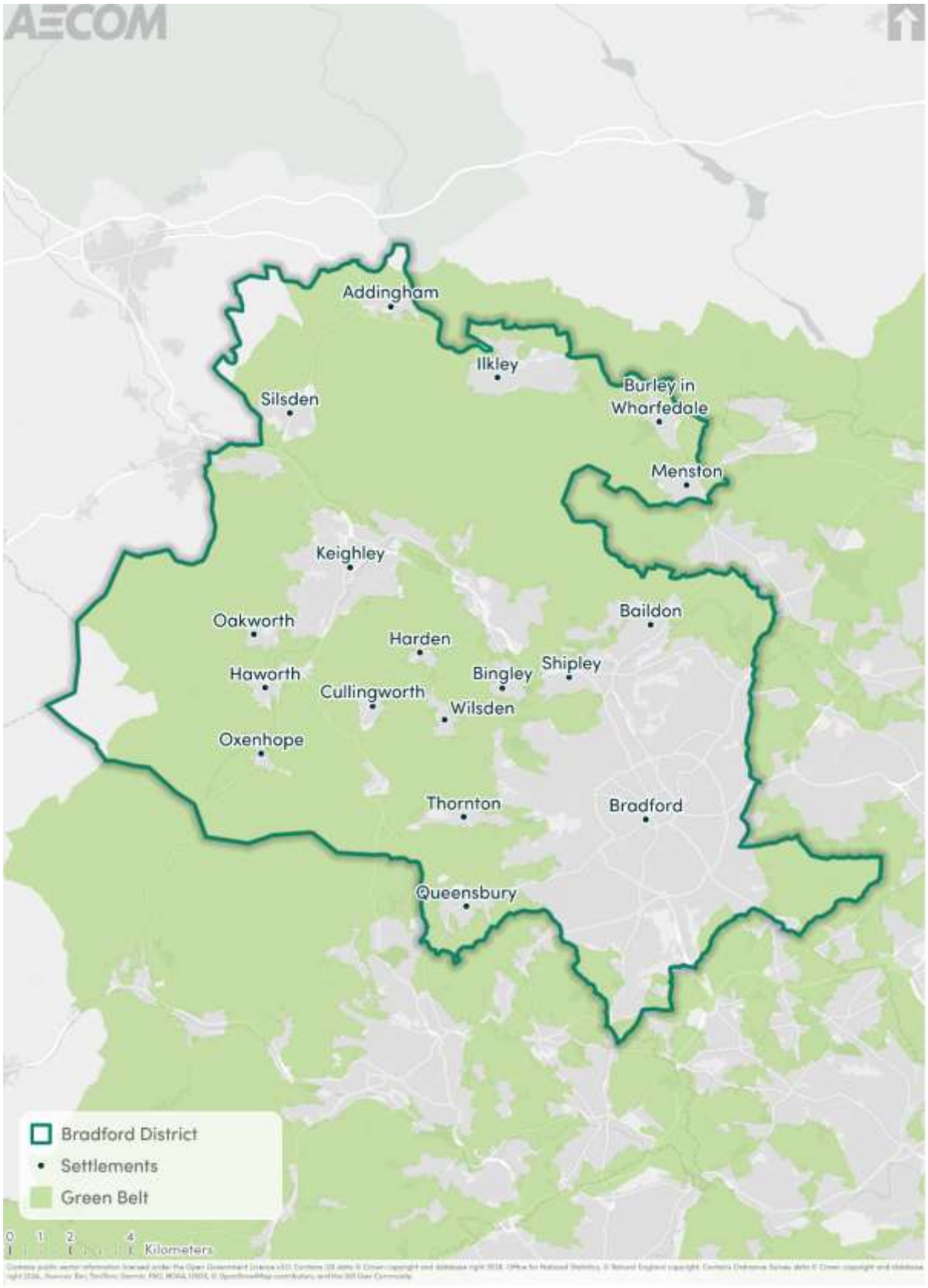


Figure 5.3 Green Belt in and around Bradford District

Designated sites for biodiversity

5.3.12 Figure 5.4 and Figure 5.5 set out the internationally and nationally designated biodiversity sites within and in proximity to Bradford. Within Bradford this includes one Special Area of Conservation, one Special Protection Area, one National Nature Reserve (though there are eight distinct sections), and three S ites of Special Scientific Interest.

5.3.13 Natural England identify the qualifying species, reasons for designation, and other characteristics for each nationally and internationally designated biodiversity site here.

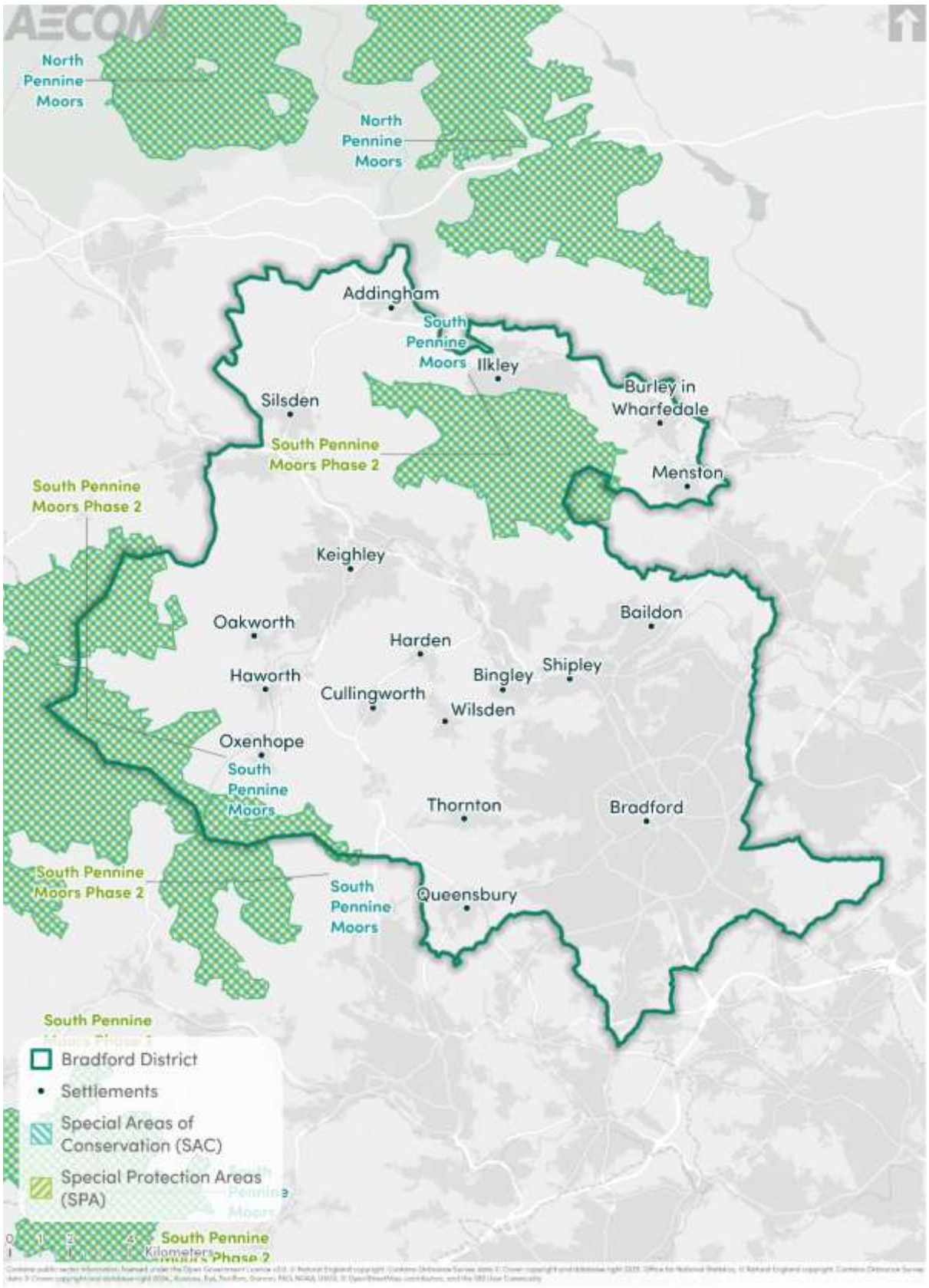


Figure 5.4 International biodiversity designations within and surrounding Bradford

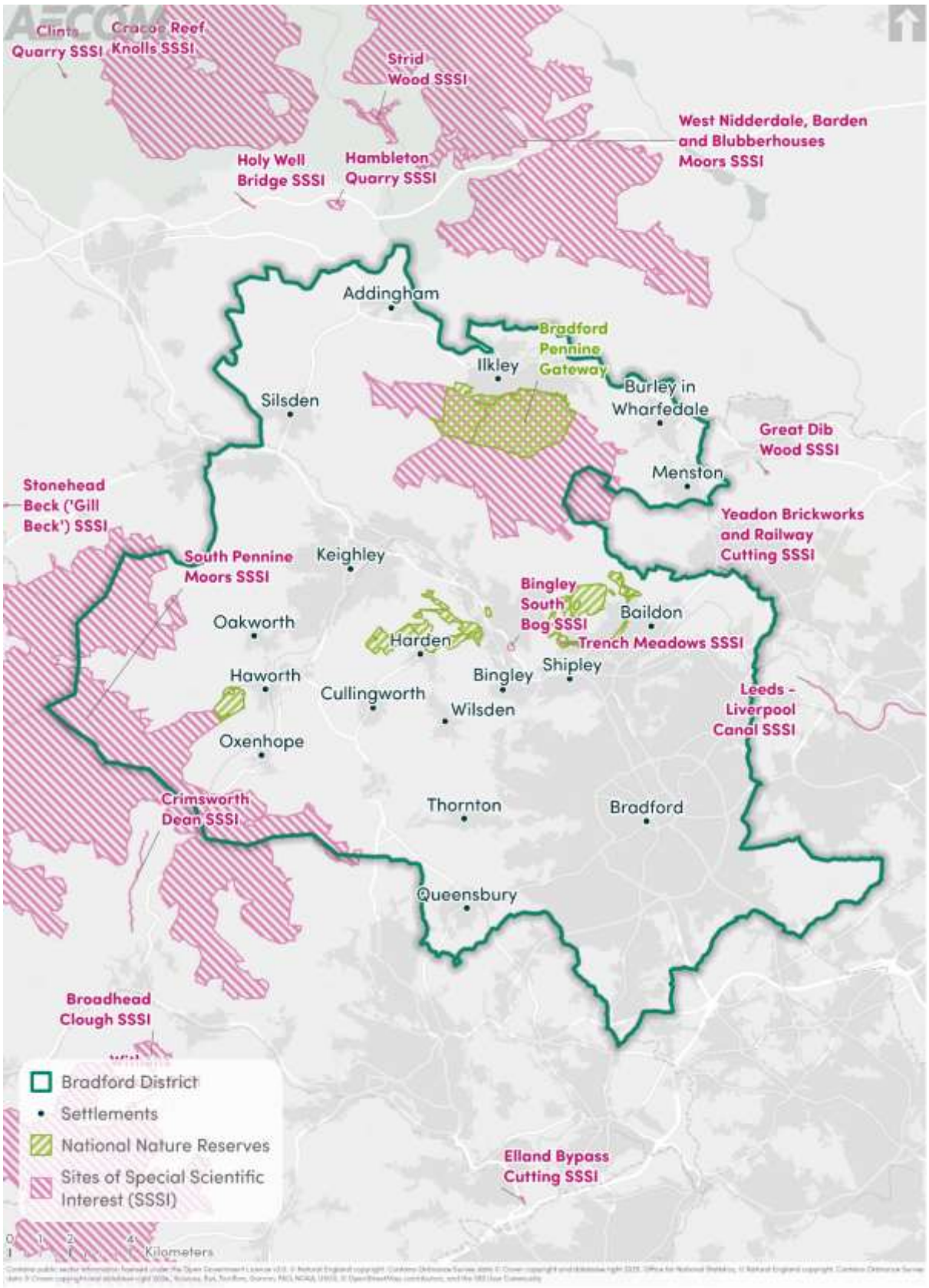


Figure 5.5 National biodiversity designations within and surrounding Bradford

Priority habitat

5.3.14 Figure 5.6 indicates that Bradford's most significant areas of priority habitats are concentrated largely in the west and the north, and ancient woodland is dispersed throughout Bradford, particularly along valley corridors and rural edges. These features represent key ecological constraints and opportunities for habitat connectivity and biodiversity enhancement.

Local Nature Recovery Strategy

5.3.15 European and national biodiversity designations within and in proximity to the Bradford District remain unchanged. Additionally, there is one national nature reserve within the District boundaries, and multiple local wildlife sites and local nature reserves. These are identified as ‘areas of particular importance for biodiversity’ in the West Yorkshire Local Nature Recovery Strategy.

5.3.16 The West Yorkshire Local Nature Recovery Strategy: Local Habitat Map highlights that there are areas of irreplaceable habitat within Bradford – including ancient woodland, blanket bog, and lowland fen. These are also identified as ‘areas of particular importance for biodiversity’. Additionally, some parts of Bradford are identified as ‘areas that could become important to biodiversity’.

5.3.17 The West Yorkshire Local Nature Recovery Strategy highlights that there are measures relating to the built environment, farmland and agriculture, grasslands, quality and condition, trees and woodland, uplands, water and wetlands, and species in Bradford. Some of these measures overlap.

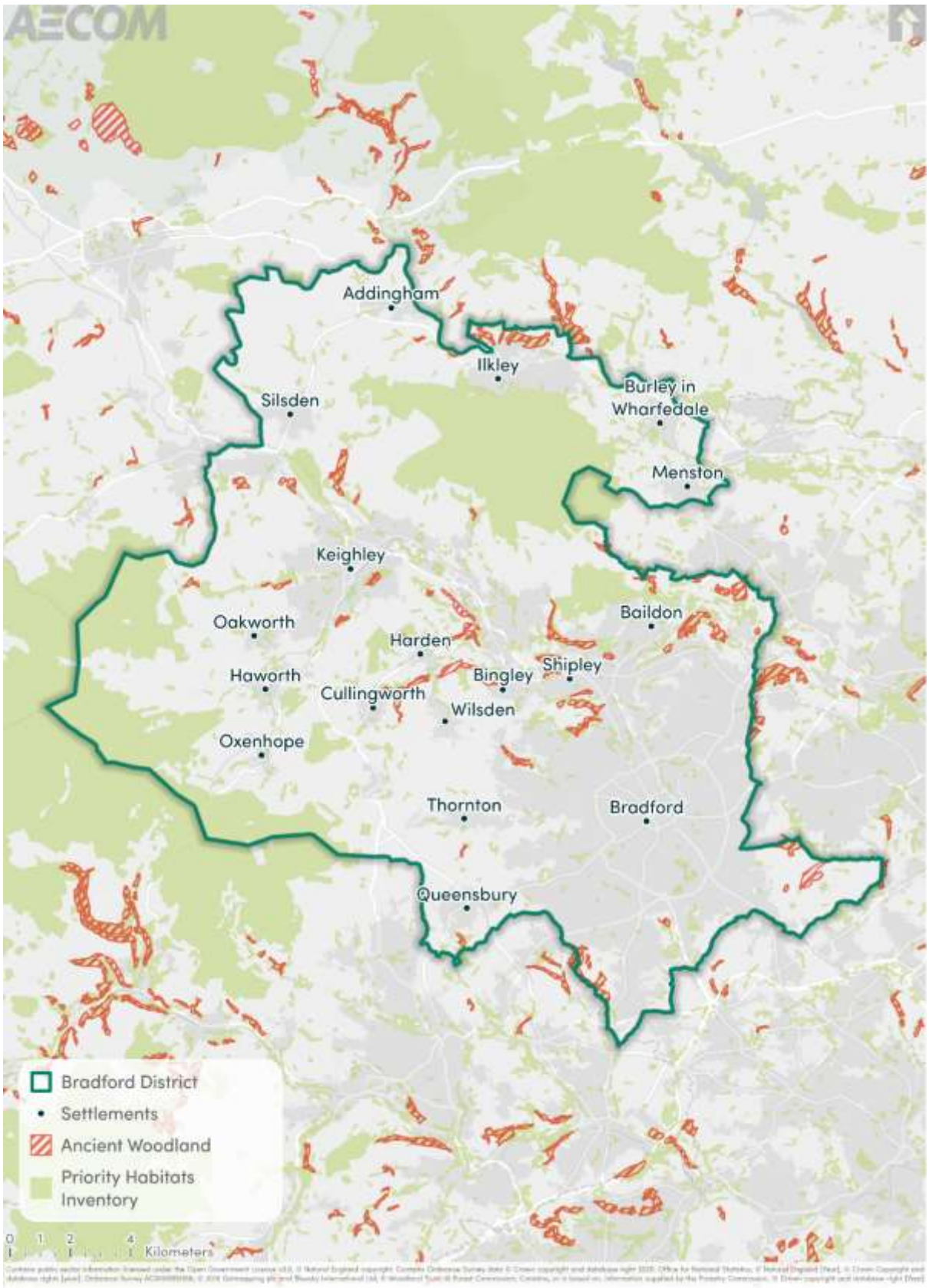


Figure 5.6 BAP Priority Habitat within and around Bradford District

5.4 Future baseline

5.4.1 Bradford has a unique landscape character, reflective of the three NCAs and the local landscape types in the area. This unique character and quality is likely to contribute to the setting of the National Park and the National Landscape. Development has the potential to adversely impact upon important landscape designations and character is not planned with high-quality design in mind.

5.4.2 In the absence of an up-to-date Local Plan, it is assumed that statutory designated sites would experience no significant negative impacts on their condition given the protection they are afforded from national policy provisions. Furthermore, it is recognised that Biodiversity Net Gain (BNG) is a mandatory requirement under the Environment Act (2021), with development required to achieve atleast 10% net gain in biodiversity value compared with their pre-development baseline. However, it is recognised that growth also has the potential to place pressure on sensitive designations, habitats and species across Bradford – for example, through habitat loss, fragmentation, and increased recreational pressure.

5.5 Key issues

5.5.1 The landscape is an important feature of the area, forming a key part of its identity. There is a need to ensure that 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.

5.5.2 Local landscape character is an important consideration, often lending to community identity within local authorities. The 2026 Landscape Character Assessment will be a key document to help inform future development in Bradford, ensuring growth reflects important character and quality.

5.5.3 Much of the Bradford area is within the South and West Yorkshire Green Belt, which is designated to prevent the uncontrolled growth and potential merging of settlements, to safeguard the countryside, and to preserve the setting and special character of settlements. Recent changes to national planning policy, including updates to the NPPF, place greater emphasis on considering Green Belt land where there is unmet housing need. This could result in development coming forward on land previously identified as being within the Green Belt.

5.5.4 There is a clear policy framework for protecting and restoring the natural environment, requiring development and plan-making to deliver measurable biodiversity gains, strengthen green infrastructure networks and long-term environmental resilience, while safeguarding protected sites and species and supporting climate, health and wellbeing objectives.

5.5.5 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.

5.5.6 In relation to SSSIs within and in proximity to Bradford, a key consideration for new development will be SSSI IRZs, and the need to engage with Natural England where proposed development poses a potential risk to a SSSI nearby.

5.5.7 The area also supports a range of wildlife habitats and species. These include a number of nationally and locally identified priority habitats and species. Emerging policies and proposals will need to consider these species and habitats and their integrity. It will also be important to ensure that future development contributes positively to on-going protection and enhancement of the areas.

5.5.8 Under the Environment Act 2021, local authorities now have a duty to enhance local ecosystems and biodiversity. This is executed through Local Nature Recovery Strategies. The West Yorkshire Local Nature Recovery Strategy identifies measures to protect and enhance biodiversity in Bradford, and also presents areas that could be used to expand the biodiversity network in the District. It will be important to consider the Local Nature Recovery Strategy in future development, to ensure that growth comes forward that contributes positively to the natural environment.

5.5.9 The Environment Improvement Plan sets interim targets aligned to national climate change objectives, including reducing the risk of harm to people, the environment, and the economy from natural hazards. To deliver climate resilience, the Plan provides a structured roadmap for improvement which will set the strategic context for local policy development.

5.6 IA objectives

5.6.1 Considering the range and breadth of issues identified above, it is proposed that the IA framework should include the following objectives relating to the natural environment :

Biodiversity: To conserve and enhance geodiversity and biodiversity, including; designated and locally important species and habitats; maintaining and strengthening ecological corridors and identifying, protecting and enhancing supporting habitats.

Landscape and townscape: To maintain, protect and enhance the character of the area’s natural and man-made landscapes and townscapes.

6. Built environment

6.1 Focus of topic

6.1.1 This topic focuses on designated and non-designated heritage assets and features (including archaeology) and their settings.

6.2 Key sources of information

6.2.1 **Table 6.1** presents relevant documents identified through the policy and evidence review carried out for the IA. These sources will be drawn upon through the baseline review and identification of key issues.

Table 6.1 Built environment – key policy and evidence documents

Document Title	Year of Publication
National	
Historic England: Heritage and Climate Change	2022
Historic England Advice Note 11: Local Planning and the Historic Environment	2022
Historic England Advice Note 4: Tall Buildings Advice Note	2022
The National Design Guide	2019
Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management	2019
Historic England Good Practice Advice: The Setting of Heritage Assets	2017
Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	2016
Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans	2015
Ancient Monuments and Archaeological Areas Act 1979	1979
Planning (Listed Buildings and Conservation Areas) Act 1990	1990
Historic Buildings and Ancient Monuments Act	1953
Local	
Saltaire World Heritage Site Management Plan 2014	2014

6.3 Baseline summary

World Heritage Sites

6.3.1 The National Heritage List for England indicates that the Saltaire World Heritage Site is within Bradford. Named after its founder, Sir Titus Salt, and the River Aire, which runs through the village, Saltaire was designed by local architects Henry Lockwood and Richard Mawson in a classical style, inspired by the Italian Renaissance. The village comprised over 800 high quality homes, two churches, a school, an adult education institute, a park, hospital, baths and wash house, and alms-houses for the elderly. It was inscribed on the UNESCO World Heritage List in 2001.

6.3.2 This is shown in Figure 6.1. It is noted that there is an associated World Heritage Site Buffer that works to protect key views into and from the World Heritage Site – largely affecting Shipley and Baildon.

Scheduled monuments, registered parks and gardens, and registered battlefields

6.3.3 The National Heritage List for England indicates that there are 196 scheduled monuments in Bradford, and a further 16 registered parks and gardens.

6.3.4 Additionally, it is recognised that the Battle of Adwalton Moor registered battlefield is also within Bradford. This site is designated for its historical significance linked to the first Civil War, as well as its landscape integrity and its archaeological potential. These are shown in Figure 6.1.

Listed buildings

6.3.5 The National Heritage List for England highlights there are 2,289 nationally listed buildings in Bradford: 23 Grade I, 69 Grade II*, and 2,197 Grade II. These are shown in Figure 6.2.

Conservation areas

6.3.6 There are 60 conservation areas in Bradford. These are split into five key areas:

- Bradford – City Centre (4 conservation areas).
- Bradford – outer areas (20 conservation areas).
- Bingley and Shipley area (13 conservation areas).
- Keighley area (18 conservation areas).
- Ilkley area (6 conservation areas).

6.3.7 It is recognised that the Leeds Liverpool Canal conservation area is located across the Keighley and the Bingley and Shipley areas, and as such is counted in both areas.

6.3.8 All conservation areas have an associated conservation area assessment published on the City of Bradford website. The location of the conservation areas is shown in Figure 6.3.

Heritage at risk

6.3.9 According to the latest available Heritage at Risk Register, there are 26 historic assets, areas and features at risk in Bradford. This includes:

- Eleven conservation areas.
- Eleven listed buildings.
- Two scheduled monuments.
- The Adwalton Moor registered battlefield.
- Whinburn, Keighley registered park and garden.

6.3.10 The location of heritage at risk assets, areas and features is shown in Figure 6.4.

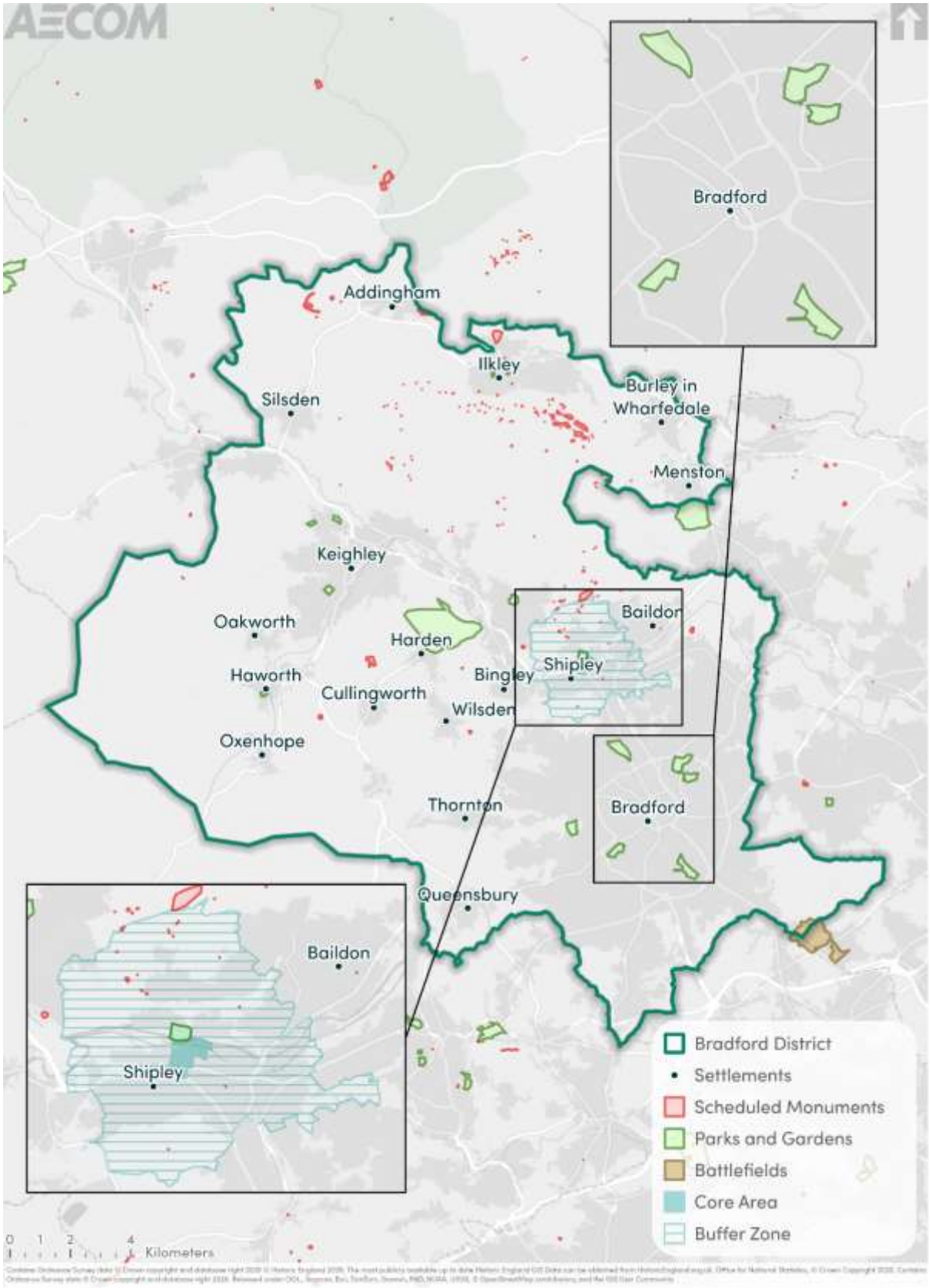


Figure 6.1 World Heritage Sites, Scheduled Monuments, Parks and Gardens and Registered Battlefields within Bradford District

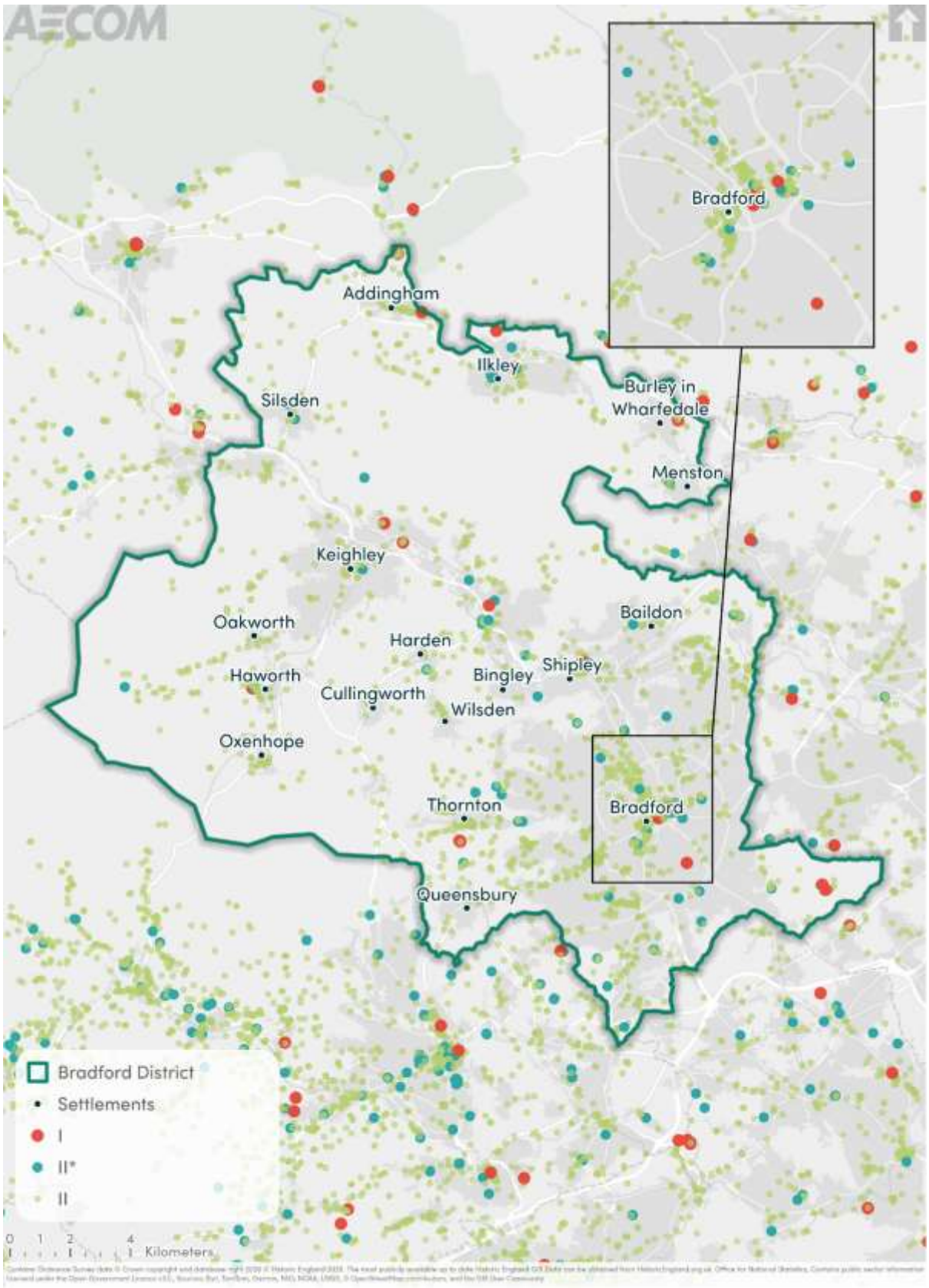


Figure 6.2 Listed buildings in Bradford District

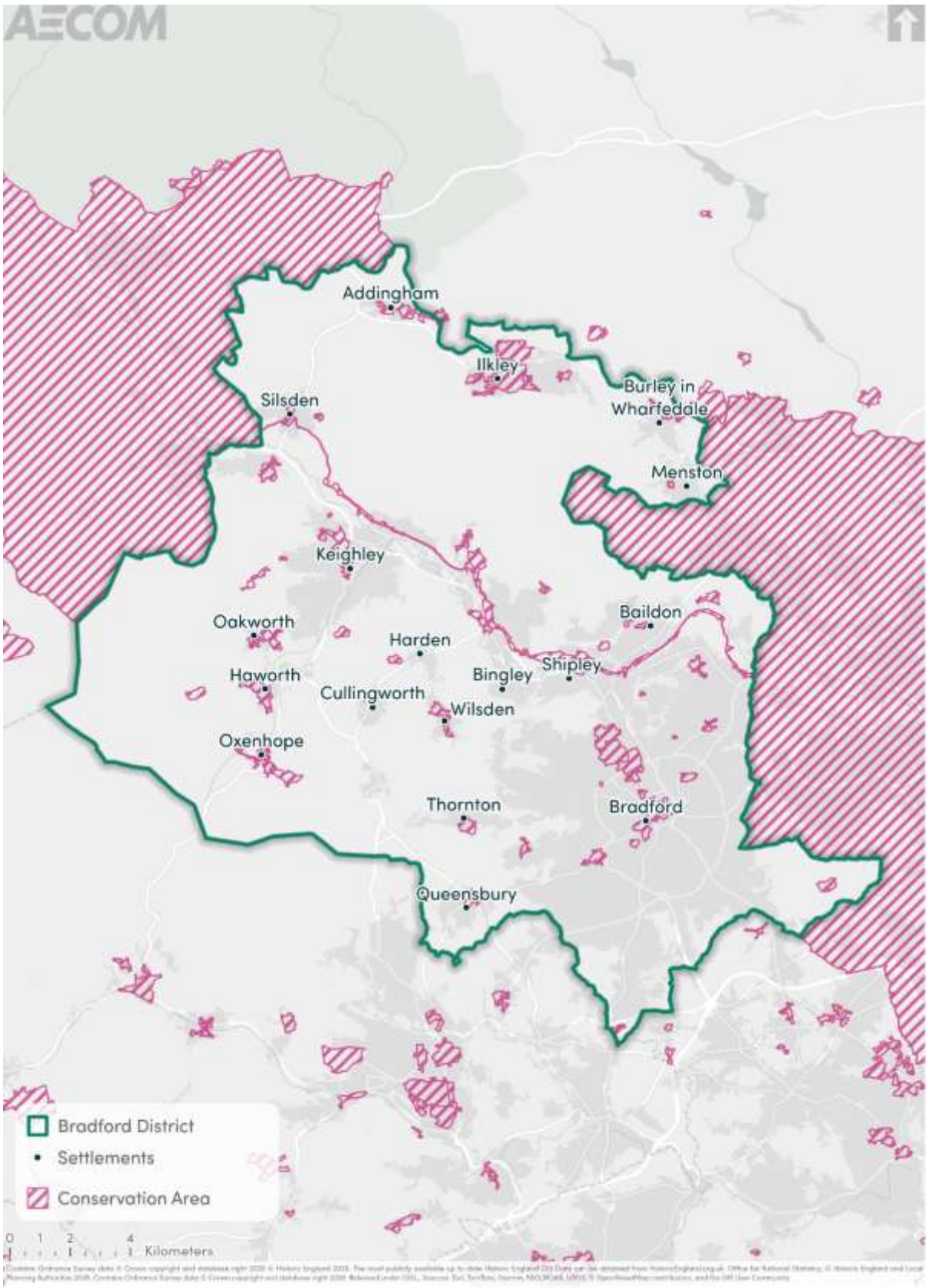


Figure 6.3 Conservation areas within Bradford District

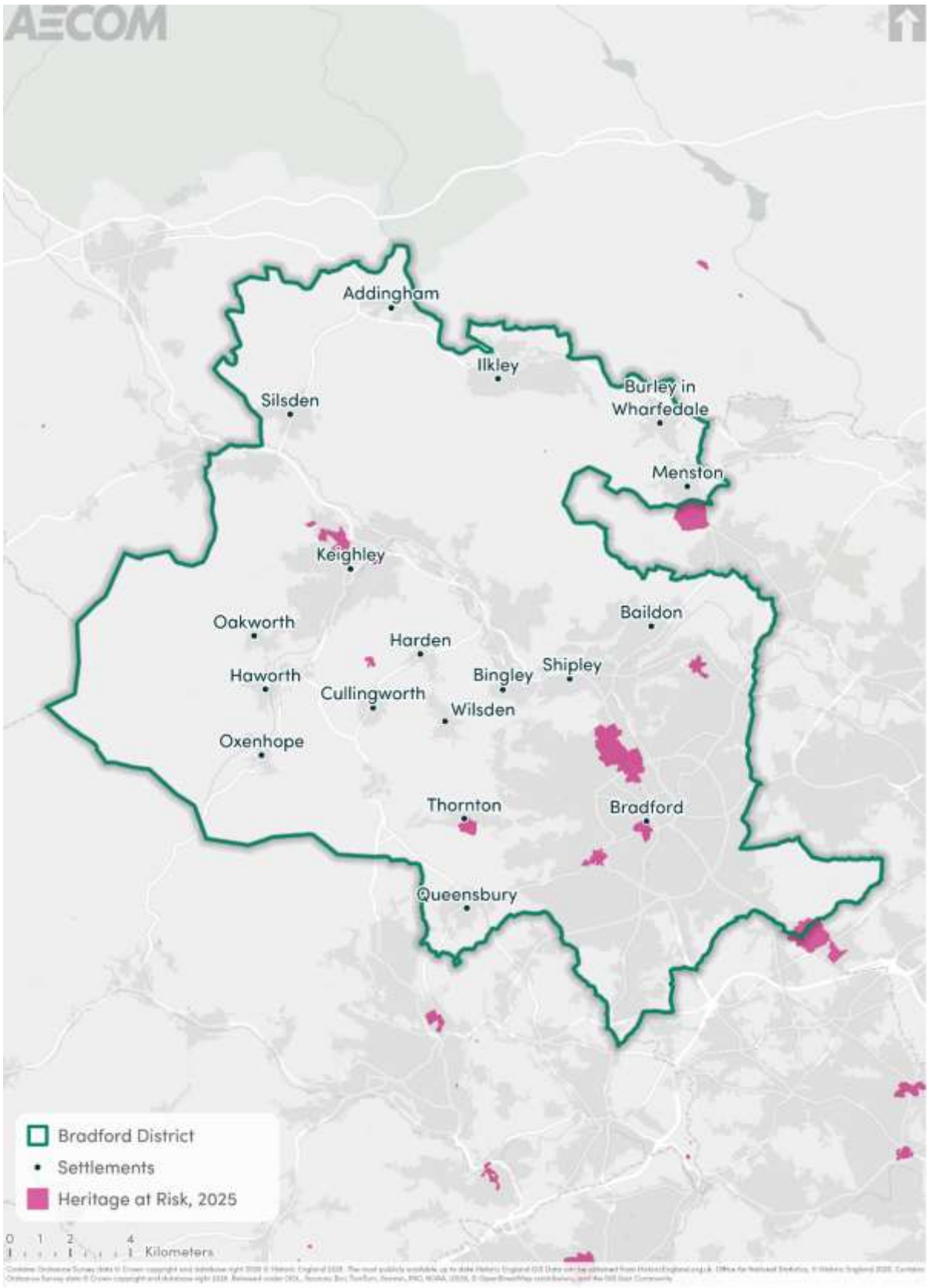


Figure 6.4 Heritage at risk (2025) within Bradford District

Non-designated heritage assets and local heritage

6.3.11 The local historic environment record for Bradford is held by West Yorkshire Archaeological Advice Service. According to the Heritage Gateway[2], there are 3,466 entries on the local heritage list located in Bradford.

6.4 Future baseline

6.4.1 Whilst designated and non-designated assets will continue to be afforded protection under the provisions of the NPPF and the Emerging Local Plan, it is recognised that future development has the potential to negatively affect designated and non-designated assets. This includes (but is not limited to) impacting historic character and setting, and disrupting valued viewpoints that contribute to heritage significance.

6.4.2 It is recognised that there are numerous assets on the heritage at risk register, which are likely to be particularly susceptible to insensitive design and layouts associated with new development.

6.4.3 Climate change threatens heritage assets across Bradford, linked to more frequent extreme weather incidents – such as increased intense rainfall, and periods of drought and heat. Higher levels of moisture can accelerate the decay of traditional building materials, particularly in historic structures, and flood events have the potential to adversely impact heritage through impacts to materials and structures of designated and non-designated assets, and buildings that form part of their setting. Dry spells can also affect ground stability, potentially impacting historic buildings and archaeological remains. Sustainable conservation strategies, including improved drainage, regular maintenance, and digital documentation, are essential to help protect the historic environment for the future.

6.5 Key issues

6.5.1 Bradford has an array for designated historic assets that contribute to 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, 60 conservation areas, 2,289 listed buildings, 16 registered parks and gardens, and one registered battlefield. It is important that these assets, together with their settings, are protected and enhanced, and where appropriate their condition improved – especially in relation to heritage assets included on the Heritage at Risk register. Site allocations and development proposals will need to reflect the character of designated heritage assets through development design, with associated conservation area appraisals and the Saltaire World Heritage Site management plan and guidance used to inform development design.

6.5.2 National policy requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk.

[2] When the webpage is open, click on the ‘more detailed search’ hyperlink, change to the admin location tab, and type ‘Bradford’ into the administrative location box. Select the relevant location, and press the search button at the bottom of the webpage. This will retrieve the data for West Yorkshire Archaeology Advisory Service.

6.5.3 As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflect current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character.

6.5.4 The conservation area assessments will require monitoring and periodic review to remain current and relevant as development pressures evolve.

6.6 IA objective

6.6.1 Considering the key issues discussed above, it is proposed that the IA should include the following objective in relation to the built environment (the full IA framework including supporting assessment questions is set out in Section 9):

Heritage: To sustain and, where appropriate, enhance the significance of heritage assets and their setting.

7. Connectivity

7.1 Focus of topic

7.1.1 This topic focuses on transport infrastructure, transport usage, and traffic flows and congestion in Bradford.

7.2 Key sources of information

7.2.1 **Table 7.1** presents relevant documents identified through the policy and evidence review carried review and carried out for the IA. These sources will be drawn upon through the baseline review and identification of key issues.

Table 7.1 Connectivity - key policy and evidence documents

Document Title	Year of Publication
National	
The Department for Transport's Second Cycling and Walking Investment Strategy	2023
The Transport Investment Strategy – Moving Britain Ahead	2017
The Department for Transport's Third Cycling and Walking Investment Strategy	emerging
Local	
West Yorkshire Combined Authority Transport Strategy 2040	2017
Bradford District Cycle Strategy: Keeping the Wheels Spinning 2016 - 2026	2016
The Northern Powerhouse: One Agenda, One Economy, One North	2015
West Yorkshire Local Transport Plan 2026	2026
West Yorkshire Mass Transit Spatial Development Framework Joint Development Plan	emerging

7.3 Baseline summary

Roads, congestion and transport links

7.3.1 Figure 7.2 overleaf shows the transport connectivity of Bradford. It shows that Bradford city itself has relatively good connectivity, especially in comparison to some of the smaller settlements within the District. More information on transport connectivity is available here. The District is well connected by road, as shown in Figure 7.2, also overleaf, with the M62, M606 and A650 providing direct links to surrounding centres including Leeds, Huddersfield, Halifax and the wider West Yorkshire city region.

7.3.2 It is recognised that major road schemes across Bradford have been approved, which is likely to help reduce congestion issues in the District in the longer term. This includes major changes to Kings Road, a new footbridge linking Steeton to Silsden, and new bus lanes on Leeds Road and Westgate.

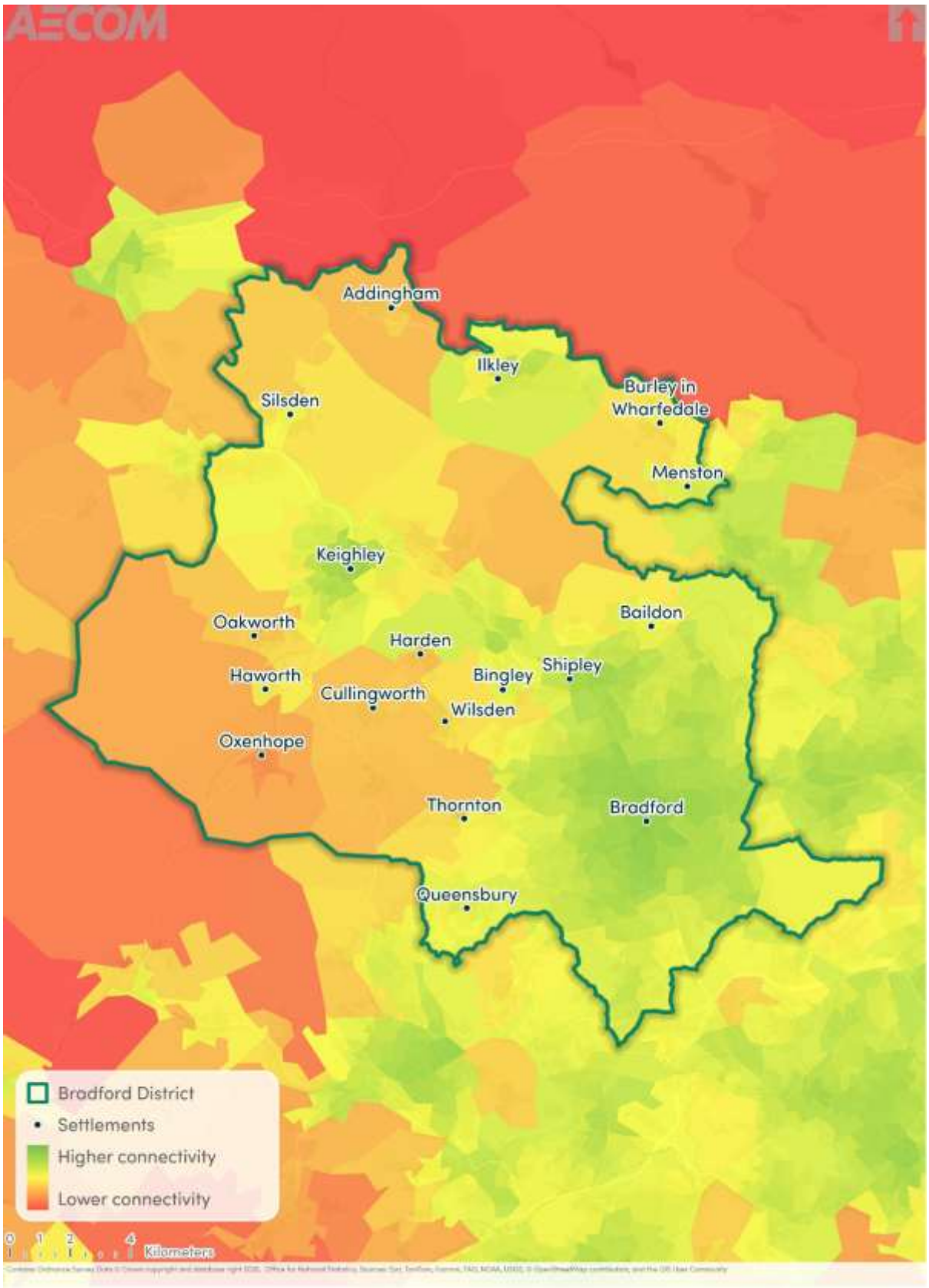


Figure 7.1 Overall connectivity (LSOA) across Bradford District

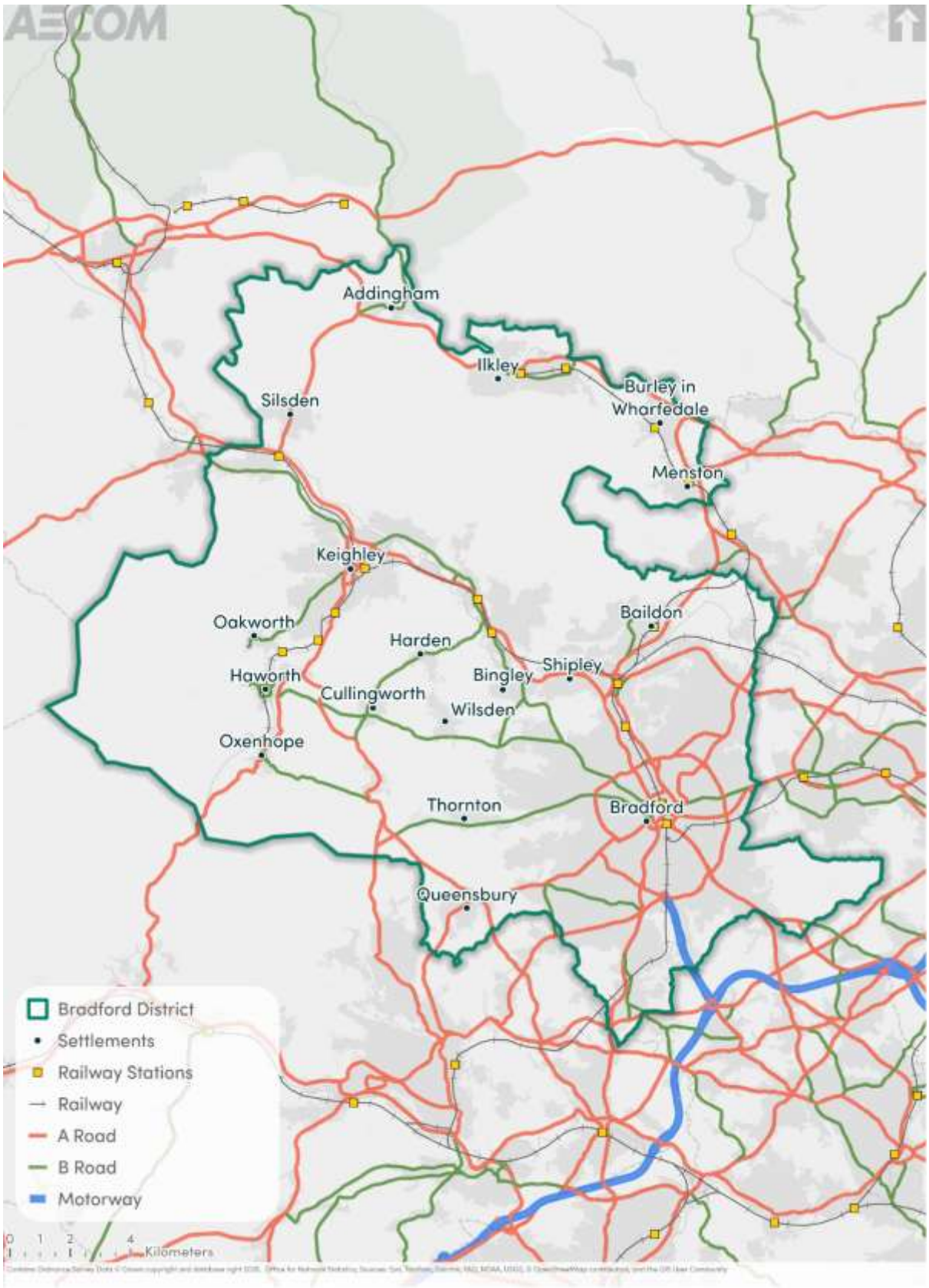


Figure 7.2 Transport infrastructure within and around Bradford District

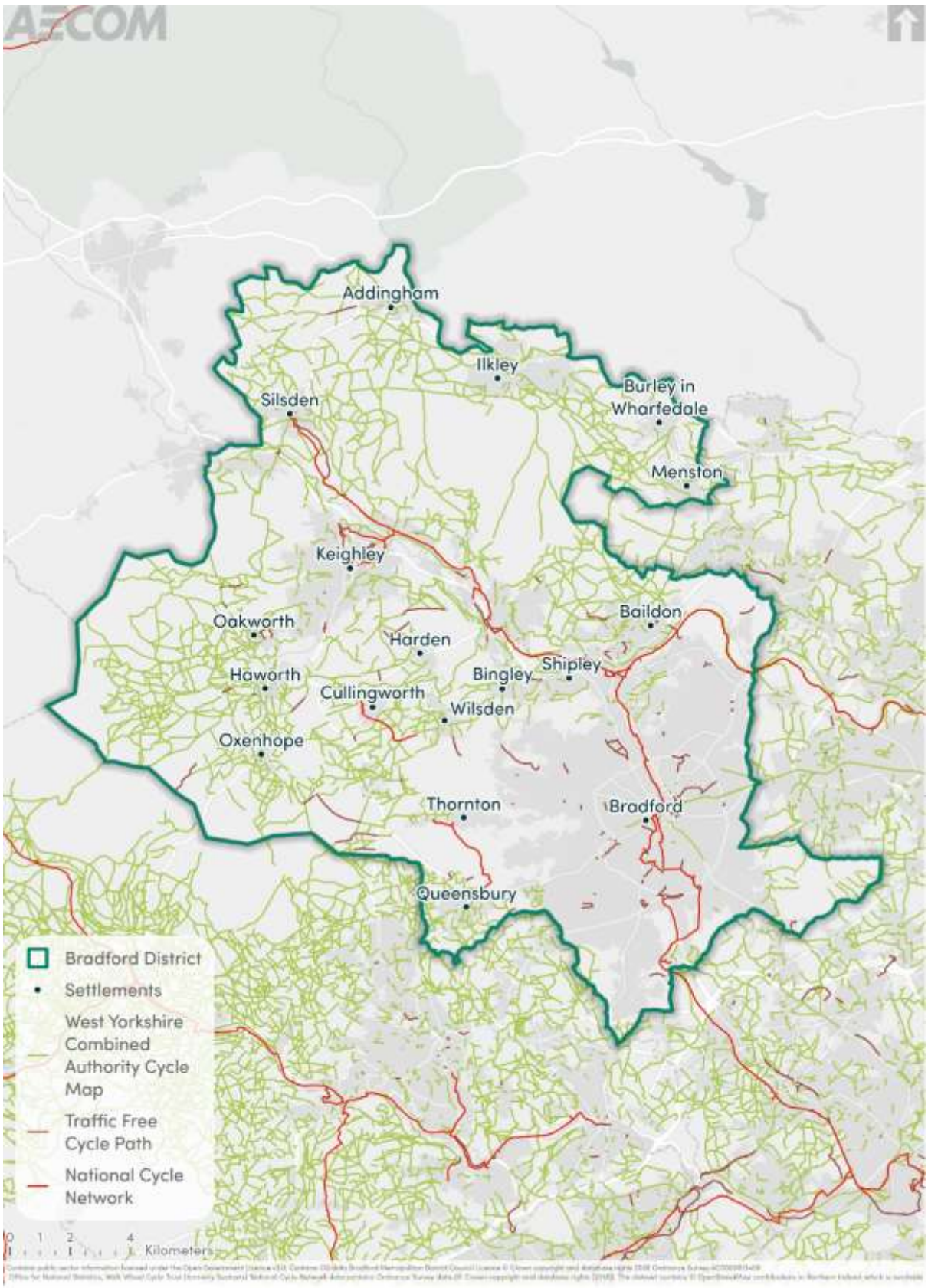


Figure 7.3 Cycling infrastructure within and around Bradford District

Public and active transport

7.3.3 Figure 7.3 shows that the cycling infrastructure around Bradford is relatively comprehensive. However, it is noted that cycle routes are more limited and poorly connected within the urban areas of Bradford itself, despite the majority of the population residing within this part of the local authority area. It is noted that strategic routes are being expanded through investment programmes such as the CityConnect programme, which has delivered improved walking and cycling infrastructure across West Yorkshire, including segregated cycle routes, safer junctions and enhanced public spaces within Bradford. These improvements aim to encourage active travel, improve accessibility, reduce reliance on private vehicles and contribute to improved health outcomes and reduced transport-related emissions.

7.3.4 The West Yorkshire Local Transport Plan provides the strategic framework for transport investment across West Yorkshire to 2040, focused on delivering the integrated Weaver Network. The Plan seeks to improve connectivity and accessibility, support economic growth, reduce transport-related carbon emissions and promote healthier travel choices through enhanced public transport, active travel infrastructure and the introduction of a mass transit system, while reducing reliance on private car travel

7.3.5 The West Yorkshire Mass Transit Vision 2040 further outlines the proposed new transport system, to create a greener and more inclusive West Yorkshire. This includes improved connections between Bradford and Leeds, Dewsbury, Halifax, and North West Leeds.

Census data – accessibility

7.3.6 Census 2021 data shows that 27.6% of households in the District have no access to a car or van, the highest proportion in West Yorkshire. However, car ownership varies significantly in the District, with 57% of households in the city of Bradford having no access to a private vehicle, whereas in Wharfedale for example, this number is significantly lower at 11.7%.

7.3.7 Despite this, the District remains heavily car-dependent overall, with 55.3% of overall commutes being made by private vehicle. Cycling accounts for just 0.7% of commuter journeys, despite over a quarter of trips being of a distance that could realistically be cycled, suggesting demand is constrained by limited cycling infrastructure. 2021 Census data also indicates that 0.1% of the working population in Bradford travelled to work via the underground, metro, light rail or tram; 1.9% travelled via a train; and 4.6% travelled via a bus, minibus or coach.

7.4 Future baseline

7.4.1 Without an updated Local Plan, growth within Bradford District is likely to increase pressure on an already car-dependent transport network. Strategic housing growth, particularly at larger allocations, would generate additional demand on key routes including the M62, M606 and A650, and approaches to Bradford city centre. Existing congestion at principal junctions may worsen, with associated effects on journey reliability, air quality, and transport-related emissions.

7.4.2 National policy increasingly emphasises locating development where sustainable travel is viable, meaning transport accessibility is likely to become a more significant factor in future site selection and infrastructure planning.

7.5 Key issues

7.5.1 The District has an extensive road and public transport network that link its communities to one another, and provides access to employment and services for local people. The road network suffers from 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).

7.5.2 National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliability of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety.

7.5.3 Delivery of active travel, bus, and wider transport improvements is notably dependent on external funding and developer contributions, creating uncertainty around timing and implementation. Where sustainable transport infrastructure is unable to be delivered early enough to support new development, long-term car dependency is likely to prevail.

7.5.4 National planning policy recognises that sustainable transport solutions will vary between urban and rural environments, with tailored frameworks set out through local and regional transport plans/ strategies. Notably the West Yorkshire Local Transport Plan seeks to bring about improvements such as these.

7.6 IA objectives

7.6.1 Considering the key issues discussed above, it is proposed that the IA should include the following objective in relation to connectivity:

Connectivity: To develop and maintain an integrated, efficient and accessible transport network that maximises access, increases sustainable transport choice, reduces congestion, and reduces the need to travel by private car/ lorry.

8. Climate and resources

8.1 Focus of topic

8.1.1 This topic focuses on air pollution, greenhouse gas emissions, energy consumption, water quality, waste, soil quality, brownfield land, and hazardous installations in Bradford.

8.2 Key sources of information

8.2.1 Table 8.1 presents relevant documents identified through the policy and evidence review carried out for the IA. These sources will be drawn upon through the baseline review and identification of key issues.

Table 8.1 Climate and resources - key policy and evidence documents

Document Title	Year of Publication
National	
Environment Improvement Plan	2025
The Seventh Carbon Budget	2025
National Framework for Water Resources	2025
Water (Special Measures Act)	2025
The Air Quality Strategy for England	2023
The Environmental Targets (Fine Particular Matter) (England) Regulations 2023	2023
Third National Adaptation Programme	2023
Carbon Budget Delivery Plan	2023
UK Climate Change Risk Assessment	2022
The Environment Act	2021
Decarbonising Transport	2021
Net Zero Strategy: Build Back Greener	2021
Heat Networks: Building a Market Framework	2020
Agriculture Act	2020
The Clean Air Strategy	2019
Clean Growth Strategy	2019
The Road to Zero	2018
Water Environment (Water Framework Directive) (England and Wales) Regulations.	2017
Future Water: The government's water strategy for England	2011
Water for Life	2011

Document Title	Year of Publication
Safeguarding our Soils: A strategy for England	2011
UK Climate Change Act	2008
Local	
Bradford Air Quality Annual Status Report (ASR)	2025
Bradford Climate Action Plan 2025-2028	2025
Yorkshire Water - Water Resources Management Plan (WRMP)	2025
Yorkshire Water - Drainage and Wastewater Management Plan (DWMP)	2023
Air Quality and Emissions Technical Planning Guidance	2017
Bradford MDC Low Emission Strategy	2013
City of Bradford MDC Air quality action plan	2009

8.3 Baseline summary

Air quality

8.3.1 Air quality has been monitored in Bradford since 1999. The 2025 Air Quality Annual Status Report highlights that the four declared Air Quality Management Areas (AQMAs) remain unchanged, and are presented in Figure 8.1 overleaf:

- Mayo Avenue.
- Manningham Lane / Queen's Road.
- Thornton Road.
- Shipley Airedale Road.

8.3.2 Though these AQMAs are still in place, it is recognised that air pollution in Bradford is improving. During 2024 there were only two monitored locations where the annual average nitrogen dioxide air quality objective of 40 µg/m^3 was exceeded – Shipley Airdale Road (DT12), and Queen's Road (DT72). A further two sites did record exceedances in the annual target; however, one was corrected (via distance to receptor point) and the target was then met, and another does not have a receptor point.

8.3.3 It is recognised that a Government mandated Class C+ Clean Air Zone (CAZ) has been introduced in Bradford. This requires buses, goods vehicles (heavy and light), coaches, hackney carriages and private hire vehicles to meet minimum emission standards – those that do not meet the standards are required to pay a daily entry fee. This has helped to improve air quality in Bradford, though the rate of improvement has started to slow. Further opportunities to accelerate local air quality improvement are being examined.

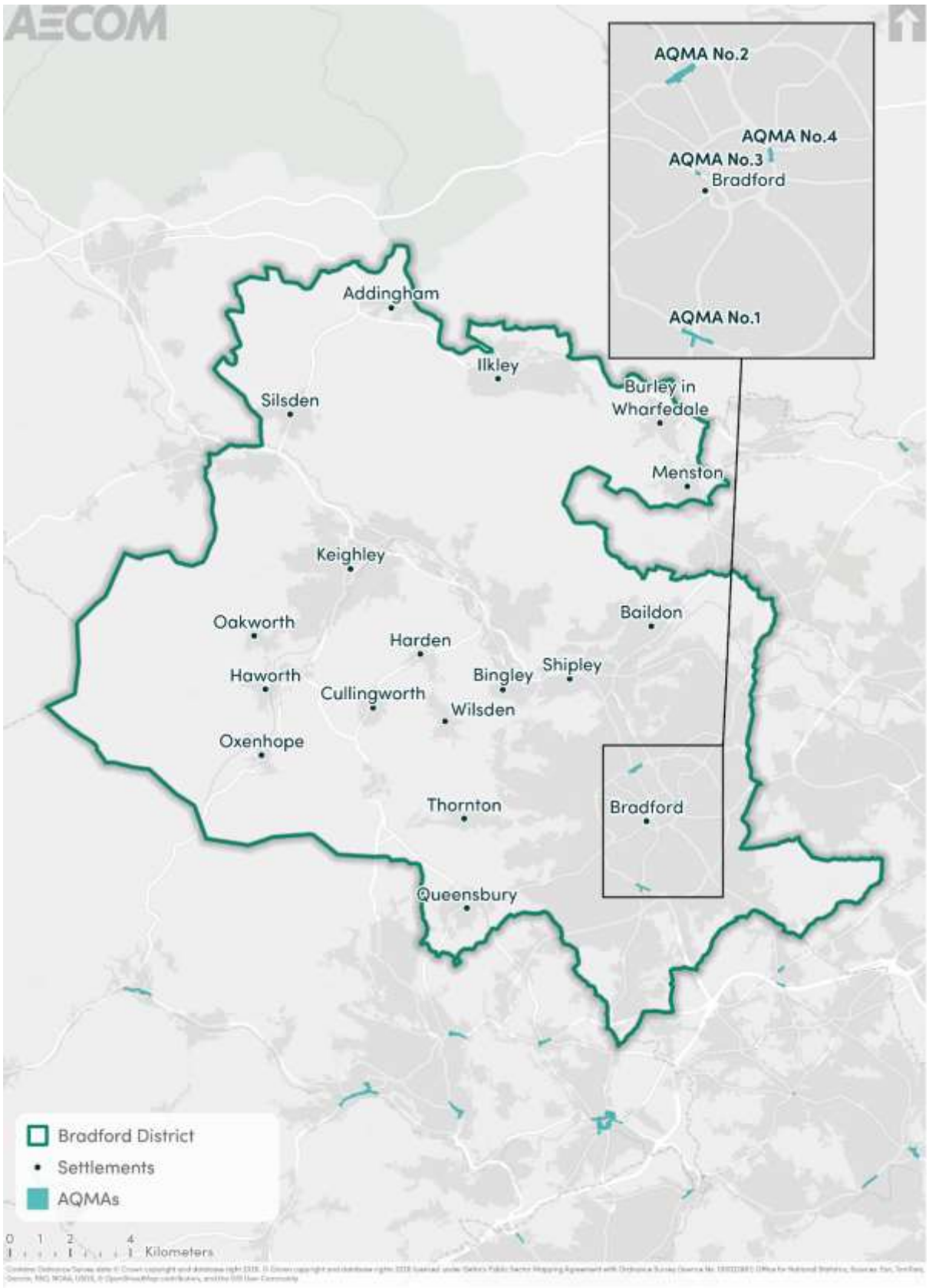


Figure 8.1 AQMAs within Bradford District

Per capita emissions

8.3.4 Table 8.2 demonstrates that per capita emissions, measured in tonnes of carbon dioxide equivalent, have decreased by approximately 42.1% in Bradford between 2013 and 2023. This is a greater decrease than regional figures (36.2%) and national figures (39.2%). Data has been taken from the UK local authority and regional greenhouse gas emissions statistics.

Table 8.2 Per capita emissions (tonnes CO_2 equivalent)

	Bradford	Yorkshire and The Humber	England
2013	5.7	9.4	7.9
2014	5.1	8.6	7.2
2015	4.9	8.5	6.8
2016	4.6	8.1	6.4
2017	4.5	7.8	6.2
2018	4.4	7.8	6.1
2019	4.2	7.5	5.8
2020	3.8	6.9	5.3
2021	4.0	7.1	5.5
2022	3.6	6.4	5.1
2023	3.3	6.0	4.8

Greenhouse gas contributions

8.3.5 According to UK local authority and regional greenhouse gas emissions statistics, in 2024 the most polluting sector in Bradford was the domestic sector (620.6 kilotons carbon dioxide equivalent – kt CO_2 e), followed by the transport sector (527.6 kt CO_2e) and then the industrial sector (298.2 kt CO_2e). Contributions are visually presented in

8.3.6 Encouraging a shift towards electric vehicles in Bradford is anticipated to contribute towards reducing emissions linked to transportation. According to Charge UK, there are 48 public charging devices in Bradford to accommodate electric vehicles – as such, it is considered that the area has moderate infrastructure and has solid coverage across core destination points. Furthermore, Bradford Council is working with Blink Charging UK Ltd to bring forward additional charging facilities as part of the Local Electric Vehicle Infrastructure program across the district.

8.3.7 It is noted that land use, land use change and forestry (LULUCF) has been responsible to reducing net carbon emissions since 2006 – and in 2024 contributed to removing 8.4 kt CO_2e in Bradford.

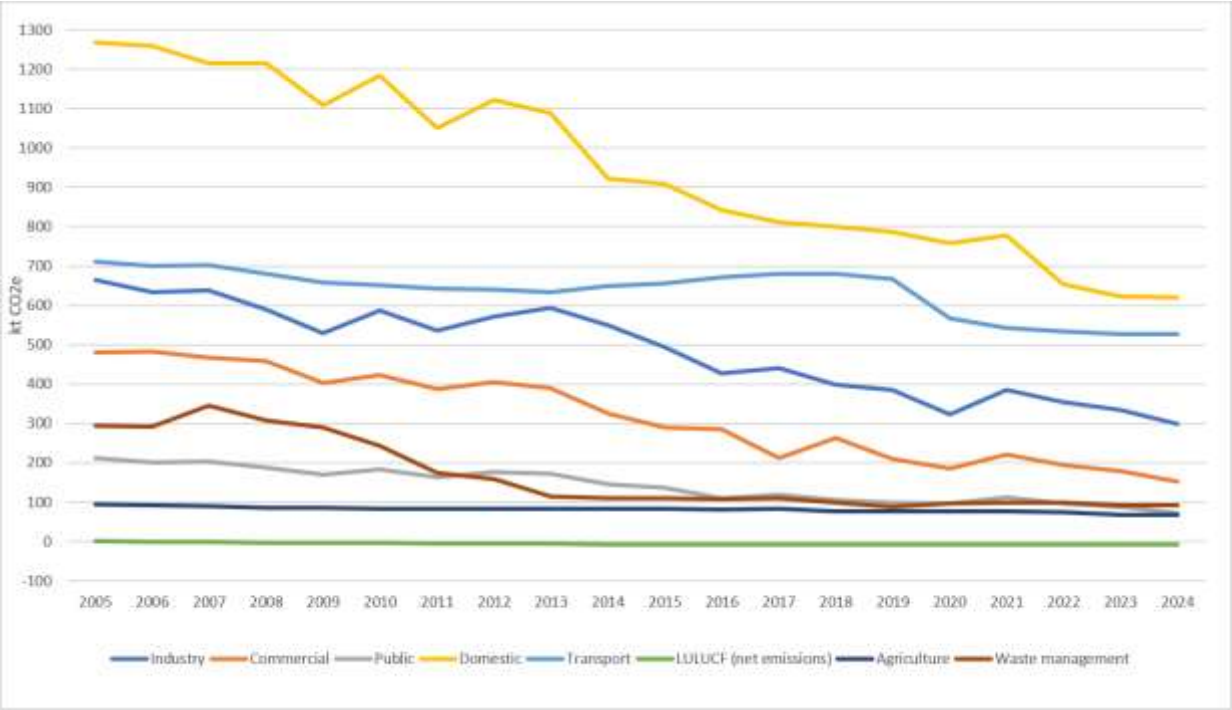


Figure 8.2 Greenhouse gas emissions by sector in Bradford, 2005-24

8.3.8 Overheating occurs when indoor temperatures exceed comfortable or healthy levels, increasing health risks and energy demand. Within Bradford, overheating risk is greatest in urban areas such as the city of Bradford itself, Shipley, Baildon, and Keighley, where more dense development, transport infrastructure, and limited green cover contribute to urban heat island effects.

Energy and gas consumption

8.3.9 According to data provided by the Department for Energy Security and Net Zero, median domestic gas consumption in Bradford between 2024-25 was 11,464.5 kilowatt hours (kWh), making it the most consuming local authority in Yorkshire and The Humber. Furthermore, according to the Department for Energy Security and Net Zero, the median electricity consumption in Bradford between 2024-25 was 2450.2 kWh, making it the second most consuming local authority in Yorkshire and The Humber after North Yorkshire (2524.7 kWh). However, it is noted that these levels are generally lower than those recorded for local authorities to the south.

8.3.10 Fuel poverty in England is measured using the Low Income Low Energy Efficiency (LILEE) indicator. Under this indicator, a household is considered to be fuel poor if:

- they are living in a property with a fuel poverty energy efficiency rating of band D or below; and
- when they spend the required amount to heat their home, they are left with a residual income below the official poverty line

8.3.11 Data provided by the Department for Energy Security and Net Zero indicates that Bradford had 26,829 households in fuel poverty in 2024. This accounts for approximately 12.2% of households; making it the greatest fuel deprived area in West Yorkshire, and the third greatest fuel deprived area in the Yorkshire and the Humber region.

Water quality

8.3.12 Bradford sits within two management catchments: Aire and Calder and Wharfe and Ouse Lower.

8.3.13 Within the Aire and Calder management catchment there are 125 waterbodies – ten of which have a good ecological status, 110 have a moderate ecological status, and five have a poor ecological status (Catchment data explorer).

8.3.14 Within the Wharfe and Ouse Lower management catchment there are 53 waterbodies – ten of which have a good ecological status, 34 have a moderate ecological status, six have a poor ecological status, and three have a bad ecological status (Catchment data explorer).

8.3.15 According to the UK Government, nitrate vulnerable zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution, largely linked to fertilisers. They include about 55% of land in England. There is an overlap with a nitrate vulnerable zone – the Spend Beck from Source to River Calder NVZ, designated for potential impacts to surface water. The location of these is shown in Figure 8.3. Additionally, there is an overlap with a drinking water protected area – the Wharfe from Barben Beck / River Dibb to Hundwith Beck, which is designated for the protection of drinkable surface water. It is further noted that there are overlaps with drinking water safeguard zones for surface water (Graincliffe, Chellow Heights, and Oldfield), and source protection zones.

8.3.16 According to Tapwater.uk, Bradford scores 9.6 out of 10 for drinking water supply in 2026. No contaminants have been flagged above recommended levels across the district.

8.3.17 There are eight waste water treatment works identified in Bradford, for which Yorkshire Water are responsible. The Drainage and Wastewater Management Plan (DWMP) indicates that increased rainfall, climate change, population growth, and urban creep have put pressure on the sewer capacity across Yorkshire Water's network – and further changes are anticipated to have a greater impact on the network.

8.3.18 Yorkshire Water's Water Management Resource Plan indicates that water efficiency measures across its area, including Bradford, include promoting behavioural change in water usage, and providing water saving devices to households. These measures are anticipated to reduce water demand from approximately 130 litres per person per day during a dry year (2019/20) to approximately 117 litres per person per day during a dry year (249/50).

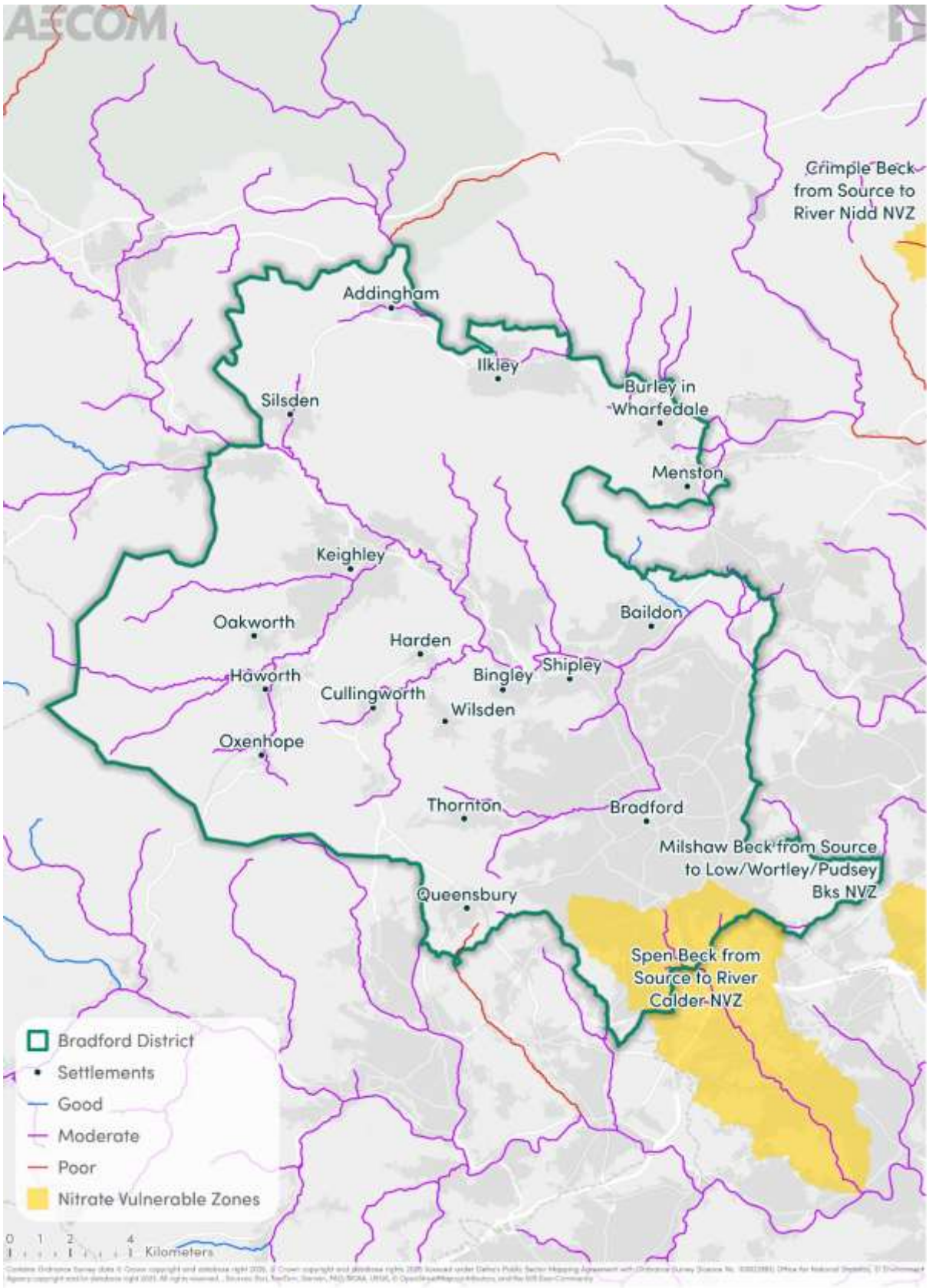


Figure 8.3 Water quality and Nitrate Vulnerable Zones in Bradford

Flood risk

8.3.19 Figure 8.4 indicates that fluvial flood risk is largely confined to rivers and their associated floodplains in Bradford. In particular, Addingham, Ilkley and Burley in Wharfedale are at fluvial flood risk linked to the River Wharfe, and Silsden, Keighley, Bingley and Shipley are at fluvial flood risk linked to the River Aire and the Leeds and Liverpool Canal. Whilst some fluvial flood risk is likely within the city centre of Bradford, it is considered to be lower risk than other areas in wider Bradford.

8.3.20 Figure 8.5 indicates that surface water flood risk is distributed throughout Bradford and affects urban and rural areas. There are parts of Bradford at higher risk, but these are largely distributed along the river corridors. Surface water flood risk is particularly a risk within and in proximity settlements, given their increased level of development and associated surface water runoff, and their reduced ability to absorb excess water.

8.3.21 It is recognised that there have been numerous flood events in Bradford in recent years, including a one in 150 year flood event that occurred in May 2024. This was due to the drainage system in Bradford becoming overwhelmed.

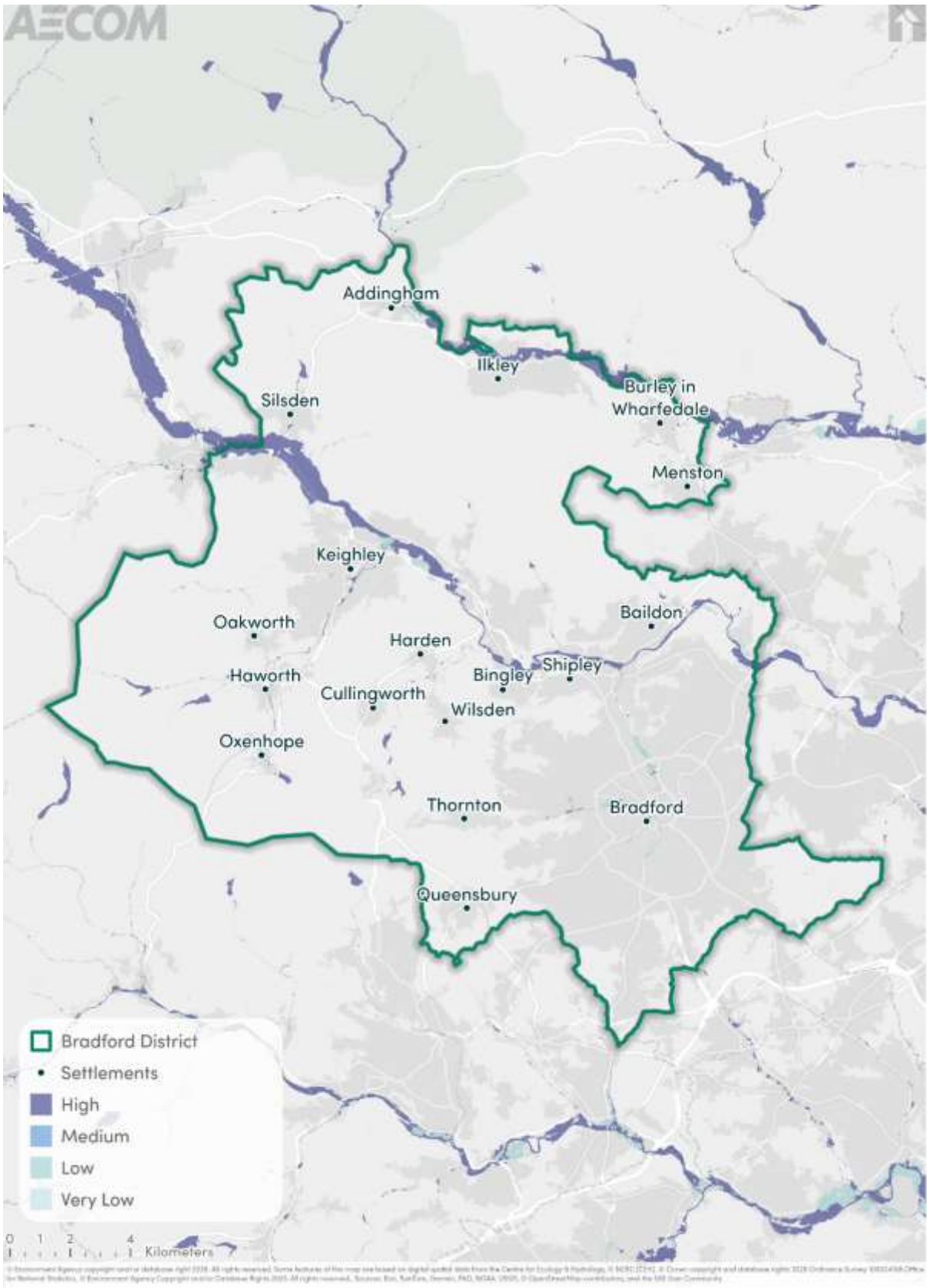


Figure 8.4 Fluvial flood risk within and around Bradford District

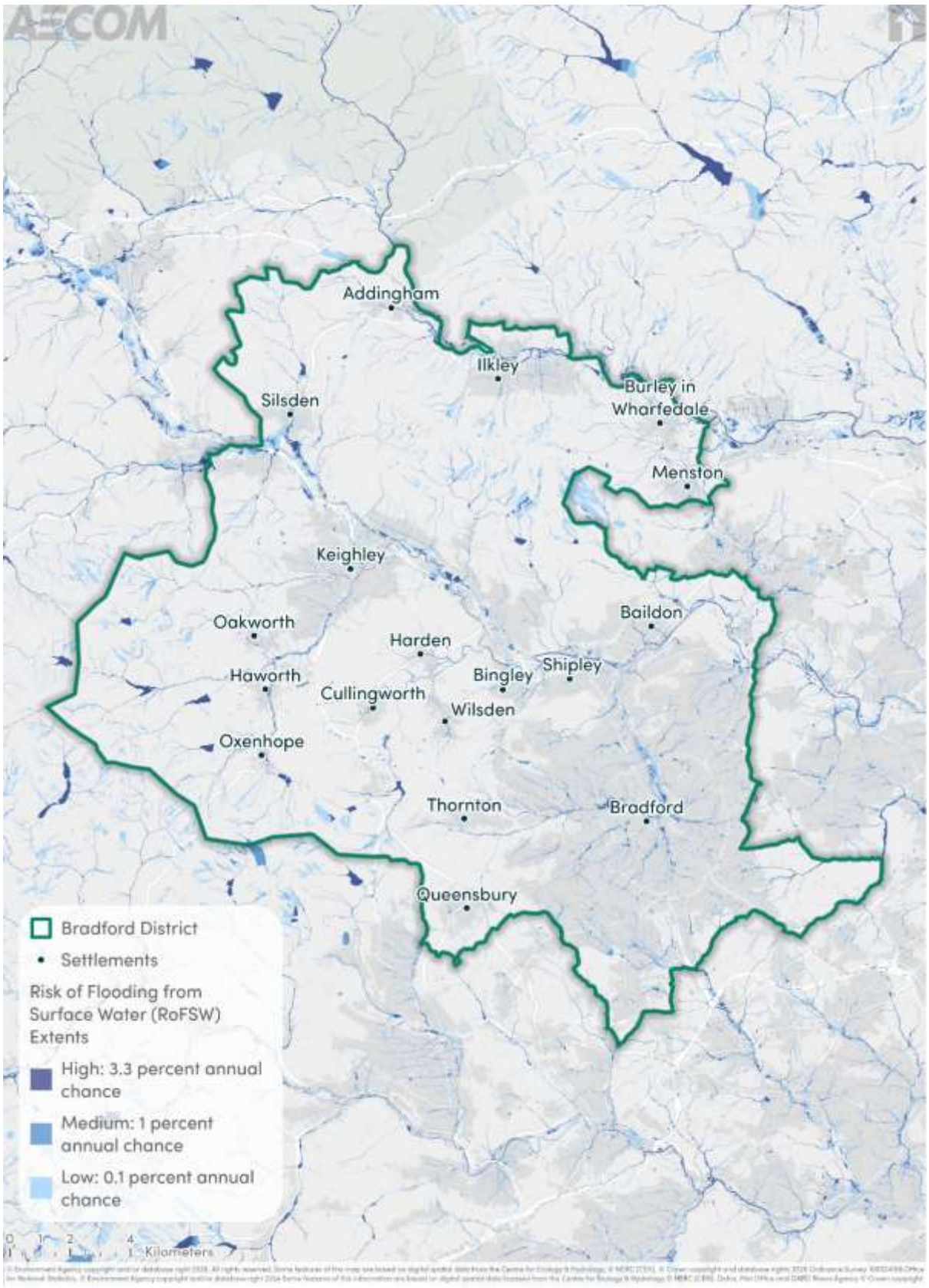


Figure 8.5 Surface water flood risk within and around Bradford District

Waste

8.3.22 The amount of household waste generated in Bradford increased over the Covid-19 pandemic, but has started to decrease again, according to the most recent annual monitoring report for 2023-34 Similarly the amount of waste recycled decreased over the pandemic but increased in 2022-23.

Table 8.3 Household waste in Bradford

Year	Household waste (tonnes)	% of household waste sent for re-use, recycling or composting
2018/19	194,900	39.5
2019/20	195,026	40.7
2020/21	212,054	37.8
2021/22	206,356	36.1
2022/23	191,500	38.9

Minerals

8.3.23 The principle mineral resources in Bradford include sandstone, sand and gravel, fireclay, coal, and hydrocarbons. As such, the area is subject to mineral safeguarding areas. For coal resources, these are largely concentrated around Bradford city itself, with a large area at Baildon and smaller areas distributed across the area. Sandstone mineral safeguarding is largely within the middle of Bradford, extending in an east-west direction. Sand and gravel safeguarding is restricted to river courses in the northern extent and to the north and east of Keighley.

Soil quality

8.3.24 Figure 8.6 overleaf presents post-1988 agricultural land classification (ALC), indicating limited areas of higher-quality agricultural land – with Grade 1 to Grade 3a being the highest quality. These areas are focused in the more rural areas of Bradford – primarily within and around Silsden, Burley in Wharfedale, and Baildon.

8.3.25 Figure 8.7 presents the predictive ALC for Bradford, indicating that a significant proportion is in urban use. Much of the area is Grade 5 (especially to the west), and Grade 4 – with a large pocket in the north. These are areas with poorer quality soils. Areas of better-quality agricultural land (e.g., Grade 3a and above) are limited and largely located on the outskirts of the built-up area of Bradford.

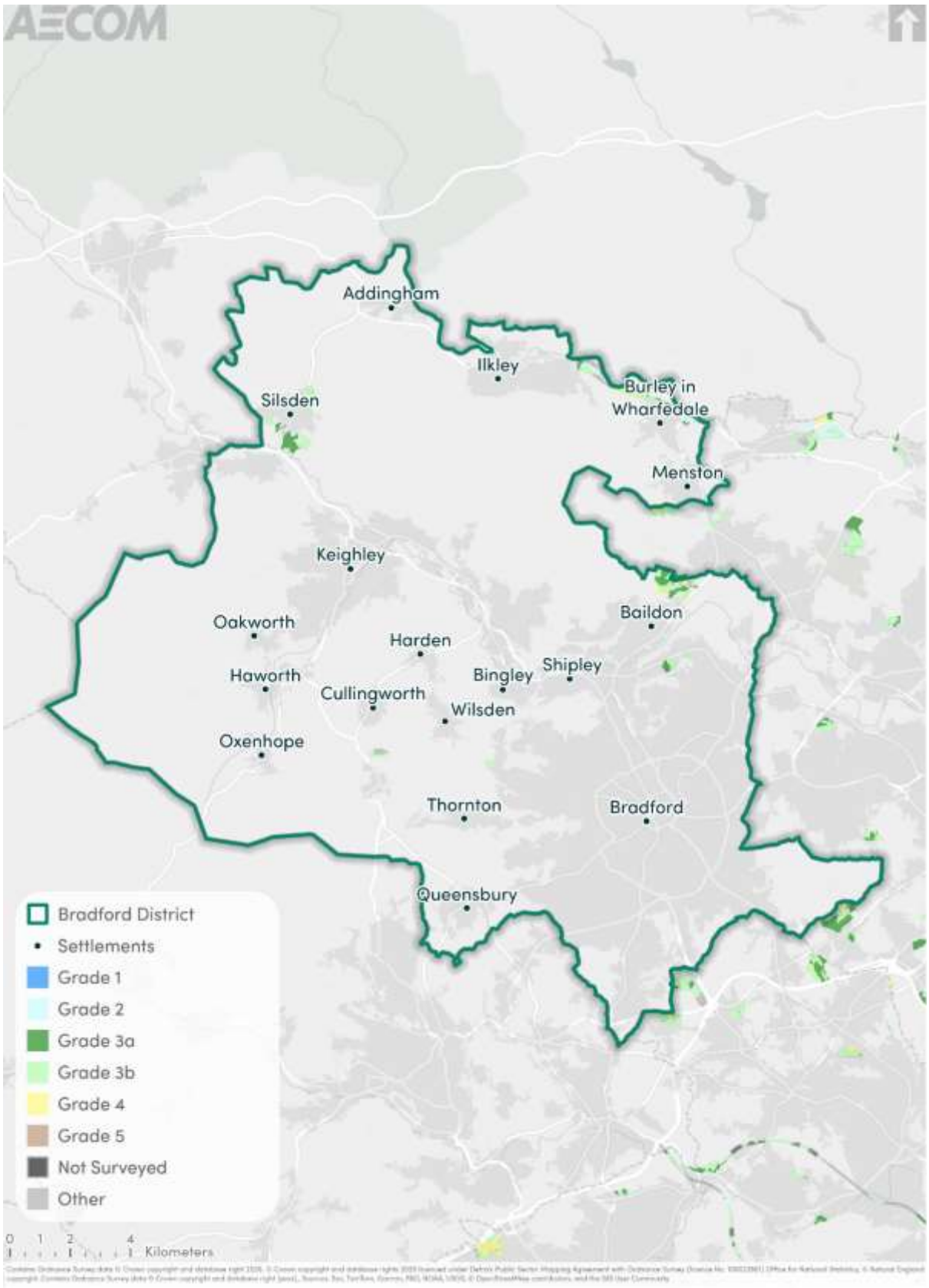


Figure 8.6 Post-1988 ALC in Bradford District

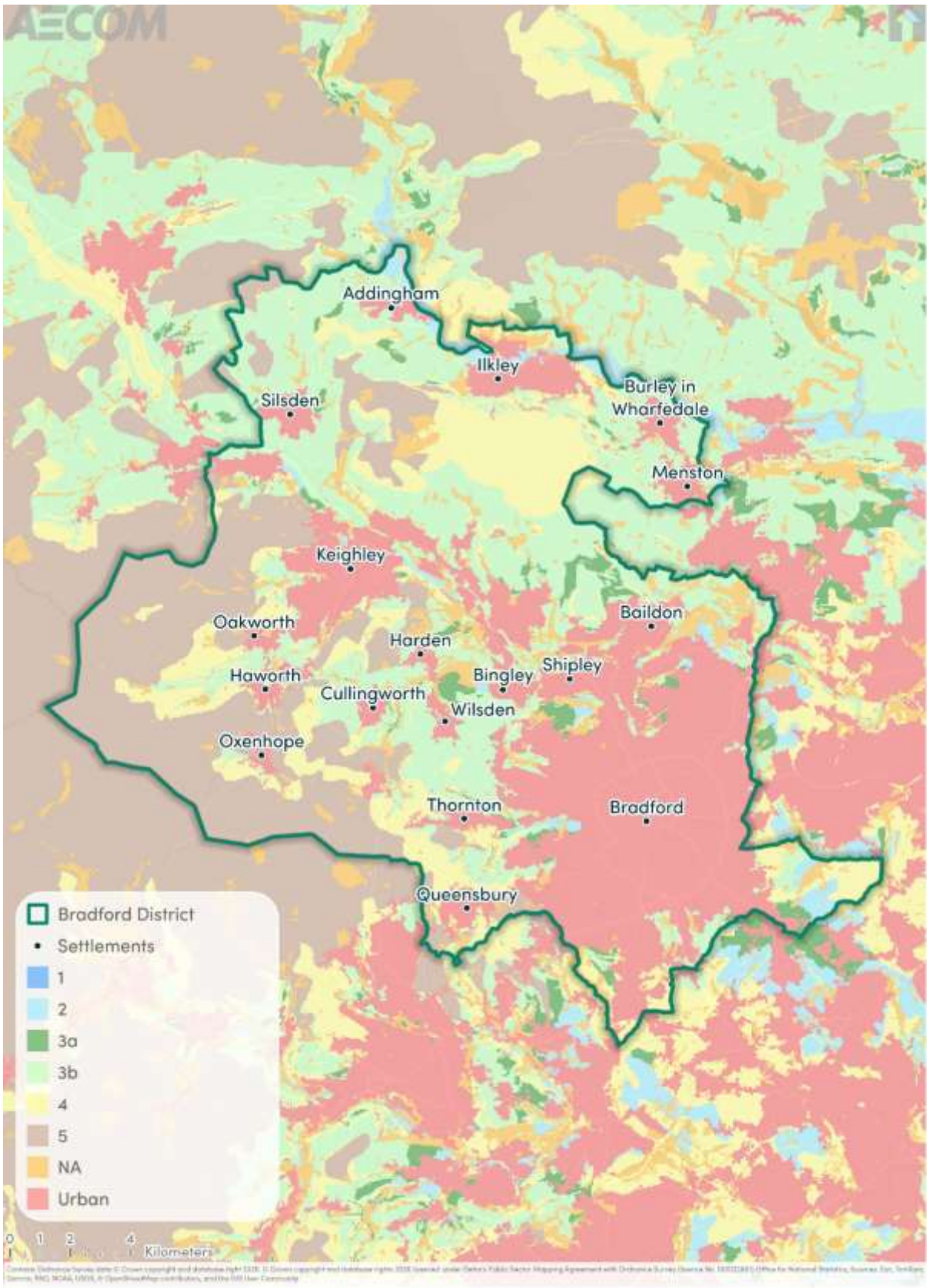


Figure 8.7 Predictive ALC in Bradford District

Brownfield opportunities

8.3.26 The latest Bradford brownfield register (published in 2025) identifies 102 sites within Bradford that could provide redevelopment opportunities. Of these, 20 are permissions (full planning permission or outline planning permission), and a further ten are pending decision.

8.3.27 The latest brownfield register includes sites that combined total 97.98ha, and could deliver a minimum of 7,595 new dwellings.

Hazardous installations

8.3.28 Within Bradford District there are sites classed as hazardous installations or COMAH establishments (COMAH stands for the Control of Major Accident Hazards), licenced by the Health and Safety Executive (HSE). These sites use chemicals that are considered to be major hazards, and as such there are buffer zones in place around these sites to reduce the potential for incidents. These sites are[3]:

- Kemira Chemicals (UK) Limited – chemicals manufacture / production, and / or disposal, and the production of basic organic chemicals.
- Nufarm UK Limited – production and storage of pesticides, biocides, fungicides, herbicides.
- Solenis UK Industries Limited – chemical installations (storage / warehousing); chemicals manufacture / production, and / or disposal, and the production of basic organic chemicals; power generation, supply and distribution; production of basic organic chemicals; and production of inorganic chemicals.
- BASF Plc – chemicals manufacture / production, and / or disposal, and the production of basic organic chemicals.

8.4 Future baseline

8.4.1 In the absence of an up-to-date Local Plan, air quality in Bradford is likely to continue its improving trend. This reflects a focus on national reductions in vehicle emissions, the clean air zone, and exploring additional opportunities to further reduce emissions linked to transport. Overall, the extent and rate of future air quality improvements are uncertain, reflecting potential changes to travel patterns, and the scale and distribution of growth. As such, it is anticipated that air quality effects are likely to remain locally variable in the future.

8.4.2 It is anticipated that average per capita greenhouse gas emissions will continue their decreasing trend in Bradford, due to continuing energy efficiency measures being implemented, as well as technological advances and improved infrastructure that help to reduce emissions associated with transport and domestic activities.

8.4.3 Future growth in Bradford is likely to increase pressure on water infrastructure. This is due to an increased level of demand associated with growth in the population.

[3] In the operator name box, type in one of the operator names from the following list and a Bradford postcode to retrieve the information.

8.4.4 This could result in capacity issues in the freshwater network and the wastewater and drainage network, given an increase in water usage and sewage levels. It could also result in adverse effects on the water quality in Bradford, given there could be increased runoff and discharge into waterbodies.

8.4.5 Growth in Bradford has the potential to increase flood risk and effects, depending on where it is focused. This is due to the increase in surface development that will reduce soil infiltration by excess water. As such, it will be important for development to be focused in areas with lower risk, and to include measures to help reduce surface water flood risk and its effects – such as permeable surface materials.

8.4.6 An increase in the built environment in Bradford, linked to an increase in development and associated residents and / or employees, will lead to an increase in waste produced, due to a greater number of resources being consumed in the area. However, it is possible that waste could be minimised through enhanced recycling initiatives, to continue the increasing recycling rate.

8.4.7 Development outside of settlement boundaries could come forward within mineral safeguarding areas, which risks the underlying resources in Bradford. It will be important to ensure new growth extracts minerals, so that their sterilisation and loss do not occur.

8.4.8 Whilst soil quality is largely low in Bradford, development on the fringes of the city could result in the permanent loss of agricultural land, given the presence of Grade 2 and Grade 3a land. It is also noted that changes to temperature and rainfall patterns could affect soil moisture, structure, and agricultural activity – which would result in the loss of more productive soils.

8.4.9 Redevelopment of brownfield sites offers opportunities to reduce urban sprawl, utilise existing infrastructure, and support regeneration. However, development on these sites may pose contamination risks.

8.4.10 Future growth in Bradford could deliver growth within closer proximity to COMAH establishments in the area. Given that there are zones in place around these sites to reduce the potential for incidents, it is not anticipated that new growth will have an impact upon these sites or increase the potential for harm.

8.5 Key issues

8.5.1 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 implementation of best practice measures. The Environmental Improvement Plan (EIP) sets out a series of actions aligned with commitments, for example to reduce NO_2 emissions by 72% from a 2005 baseline level. Actions include utilising data access to inform local interventions in communities where those most vulnerable to air pollution are exposed to higher levels.

8.5.2 CO_2 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.

8.5.3 The most polluting sector in relation to greenhouse gas emissions is the domestic sector, followed by the transport sector, and the industrial sector. Policies and proposals should seek to reduce emissions where possible, including through encouraging an uptake in electric vehicle usage and sustainable / active transport opportunities, as well as design stipulations that reduce emissions linked to an increase in activity in Bradford.

8.5.4 Gas and electricity consumptions in Bradford are higher than consumptions in other regional local authorities, and has fallen overall in recent years. This has likely contributed to the experienced fuel poverty in the area. 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.

8.5.5 The quality of the various rivers within the District varies with a number being classed as moderate, poor or bad, thereby not meeting Water Framework Directive (WFD) standards. It is therefore important that water quality is improved, to meet WFD standards, with emerging policies and proposals considering impacts on the water environment. Water resources also need to be safeguarded.

8.5.6 Growth in Bradford is likely to increase water demand / consumption, linked to an increase in the population and associated activities requiring water resources (e.g., water for drinking, water for washing etc). This could also lead to increased pressure within the waste water infrastructure network in Bradford. Without measures in place to improve efficiency and reduce consumption, there is a risk that water resources and availability could decrease. However, it is considered that the provisions included in Yorkshire Water's Water Resource Management Plan (WRMP) and Drainage and Wastewater Management Plan (DWMP) will contribute positively to securing efficiency improvements and water sources, and protect and enhance the waste water infrastructure network.

8.5.7 There are various sources of flood risk within Bradford. The impact of development on water management in the area will need to be considered. This should include assessing the risk of flooding, reducing the potential risk, and mitigating flood effects – in relation to protect housing, infrastructure, and human wellbeing. Future development should contribute to reducing flood risk via the provision of appropriate drainage infrastructure, including the use of Sustainable Urban Drainage Systems (SUDS).

8.5.8 The 25-year Environment Plan and EIP focus on key priority areas including the water environment. The EIP sets interim targets – in particular, that water resources are clean, resilient, and plentiful by supporting catchment partnerships and natural drainage solutions.

8.5.9 Development outside of the urban areas could result in the loss of agricultural quality land, the loss of which cannot be mitigated. As such, it will be important for development to be steered towards lower quality land and identified brownfield opportunities. National policy, notably the NPPF, 25-Year Environment Plan, and the Environment Improvement Plan, encourage efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains. This supports the Soil Strategy for England which seeks to ensure that all England's soils will be managed sustainably.

8.5.10 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 the 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, though there was a temporary increase during the Covid-19 pandemic. Most of this is sent for re-use, recycling or composting. Therefore, it is important that emerging policies and proposals seek to continue to support the reduction in waste generated and encourage greater re-use, recycling and composting.

8.5.11 Bradford supports several 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 materials to reduce the need for primary mineral extraction.

8.6 IA objectives

8.6.1 Considering the range and breadth of issues identified above, it is proposed that the IA framework should include the following objectives relating to climate and resources (the full IA framework including supporting assessment questions is set out in Section 9):

Climate change resilience: Minimise and manage the impacts of climate change on the District and vulnerability to its effects, particularly flood risk and overheating.

Addressing causes of climate change: Ensure the prudent and efficient use of energy and resources, whilst promoting the use of renewable and low carbon energy sources.

Addressing causes of climate change: To reduce greenhouse gas emissions by supporting development that promotes sustainable travel, reduces the need to travel, and facilitates the transition to low-carbon transport.

Natural resources: To prioritise the development of previously developed land and buildings including via the remediation of contaminated land and protection of greenfield sites.

Natural resources: Protect agricultural land and soils and avoid the loss of the highest-quality grades.

Natural resources: To protect mineral resources from sterilisation by other uses and promote the greater use of secondary and recycled materials.

Natural resources: To minimise waste and increase the amount of waste which is re-used, recycled and recovered.

Water resources: Reduce water consumption, improve water quality, and ensure an adequate supply of water can be provided in Bradford whilst also reducing the potential for contamination of waterbodies and groundwater.

Air quality: To safeguard and improve air quality and reduce the impacts upon human health.

9. Proposed IA framework

9.1.1 The IA framework has been established through refining key issues into a concise set of sustainability objectives, supported by a series of bespoke assessment questions. This draws upon the baseline position and policy context that has been prepared in Chapters 2-8 above for broad thematic areas.

9.1.2 Error! Reference source not found. overleaf sets out the proposed IA framework of objectives and supporting questions alongside relevant key issues and SEA Directive topics.

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
Addressing causes of climate change Energy consumption and per capita CO_2 emissions in Bradford are below regional and national averages; however reducing greenhouse gas emissions, particularly from transport, remains a key issue. Continued improvements in energy efficiency and the transition to low-carbon development present opportunities to support more sustainable resource use and reduce emissions in line with national and local targets/ objectives.	Ensure the prudent and efficient use of energy and resources, whilst promoting the use of renewable and low carbon energy sources. To reduce greenhouse gas emissions by supporting development that promotes sustainable travel, reduces the need to travel, and facilitates the transition to low-carbon transport.	• Ensure new developments are energy efficient? • Reduce greenhouse gas emissions to accelerate to net zero? • Expand EV charging infrastructure to support the shift to electric and low emission vehicles? • Support the delivery of low carbon and renewable energy generation? • Promote sustainable transport options that reduce transport emissions? • Improve the energy efficiency of historic buildings, taking into account their embodied carbon value?	Climatic factors, air, human health
Natural resources Development outside urban areas could result in the irreversible loss of agricultural land, highlighting the need to prioritise brownfield and lower-quality land for development in line with national policy objectives for sustainable land use and soil conservation.	To prioritise the development of previously developed land and buildings including via the remediation of contaminated land and protection of greenfield sites. Protect agricultural land and soils and avoid the loss of the highest-quality grades.	• Minimise the loss of high-quality agricultural land, and encourage brownfield development as far as possible? • Encourage the retention and reuse of buildings wherever possible in preference to demolition? • Promote a circular waste economy? • Continue to reduce waste from different sources and increasing recycling rates	Soil, material assets

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
Bradford's mineral resources, particularly sandstone, are at risk of sterilisation from inappropriate development, while greater use of secondary and recycled materials is needed to reduce demand for primary extraction. There is a need to safeguard existing resources while promoting greater use of secondary and recycled materials to reduce reliance on primary mineral extraction. Although waste generation has generally declined, there is an ongoing need to further reduce waste and improve resource efficiency through greater re-use, recycling and composting.	To protect mineral resources from sterilisation by other uses and promote the greater use of secondary and recycled materials. To minimise different types of waste and increase the amount that is re-used, recycled and recovered.	• Safeguard mineral resources within Mineral Safeguarding Areas, ensuring that non-mineral development does not prevent future extraction?	
Climate change resilience Bradford is susceptible to a range of climate change impacts, including flooding and overheating, which are expected to become more significant over time. High quality	Minimise and manage the impacts of climate change on the District and vulnerability to its effects, particularly flood risk and overheating.	• Increase the resilience of the built and natural environment to the future effects of climate change, e.g. overheating and increased storm severity?	Climatic factors, water, flora, fauna

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
design and masterplanning can strengthen the resilience of places through sustainable drainage, effective water management and climate-responsive solutions.		• Ensure that the potential risks associated with climate change are considered in new development in the District? • Support urban greening and increased tree cover in new development ? • Protect, improve and extend green, blue infrastructure networks within the District and wider areas to support climate change adaptation? • Utilise nature based sustainable drainage systems to sustainably manage/reduce surface water run-off? • Minimise flood risk for key infrastructure?	
Water resources Several rivers within the district have moderate or poor ecological status and fail to meet Water Framework Directive (WFD) standards, highlighting ongoing pressures on water quality and the need to protect water resources. The 25-Year Environment Plan and Environmental Improvement Plan seek to improve water quality.	Reduce water consumption, improve water quality, and ensure an adequate supply of water can be provided in Bradford whilst also reducing the potential for contamination of waterbodies and groundwater.	• Avoid negative impacts on the chemical and ecological status of water, and support improvements to water quality where achievable and appropriate? • Avoid encroachment into riparian environments? • Provide the potential to improve water efficiency? • Support re-naturalisation of watercourses? • Support the use of nature based SUDs to reduce pollution and improve quality of water resources ? • Provide appropriate pollution control at a strategic level?	Water, fauna, flora, human health

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
		• Ensure development is supported by sufficient waste water infrastructure in a timely manner?	
Biodiversity Bradford contains internationally important biodiversity assets, including the South Pennine Moors SPA/SAC, alongside nationally and locally designated sites, species and habitats. These assets are both vulnerable to the impacts of development (i.e. recreation), and provide opportunity for connectivity and enhancement where appropriately planned for. As established through the Environment Act 2021, there is a need to enhance ecological networks across Bradford. Measures include delivering biodiversity net gain and supporting the priorities of the West Yorkshire Local Nature Recovery Strategy to improve long-term ecosystem resilience.	To conserve and enhance geodiversity and biodiversity, including; designated and locally important species and habitats; maintaining and strengthening ecological corridors and identifying, protecting and enhancing supporting habitats.	• Avoid or mitigate adverse impacts on internationally and nationally designated sites and their integrity? • Improve the condition of designated sites with indicators showing progress towards favourable condition in SSSI units? • Contribute towards the Environmental Improvement Plan's target of protecting 30% of the UK's land by 2030 in order to restore nature and promote species abundance? • Protect and enhance locally important sites? • Contribute towards West Yorkshire Local Nature Recovery Strategies? • Deliver net gains for biodiversity, including via supporting connected and resilient ecological networks and habitat creation and restoration? • Prevent habitat loss, fragmentation, and degradation, maintaining or improving connectivity through wildlife corridors and ecological networks? • Support the conservation and enhancement of priority habitats and protected species?	Biodiversity, fauna, flora

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
Landscape and townscape Bradford's distinctive landscape character and settlement pattern (established through the LCA) contribute strongly to the District's identity and should be conserved and enhanced through future growth. The District's varied landscapes, including the Yorkshire Dales National Park, Nidderdale NL, and Green Belt, play an important role in landscape quality, openness and the setting and identity of settlements.	To maintain, protect and enhance the character of the area's natural and man-made landscapes and townscapes	• Protect and enhance local character, distinctiveness & sense of place? • Respect the distinctive features and characteristics of the eight landscape character types as established through the LCA? • Use new and existing natural landscape features to mitigate any potential effects on nearby and distance interpretations of its landscapes? • Contribute to the preservation and enhancement of the special qualities of the Yorkshire Dales National Park and the Nidderdale National Landscape? • Avoid development of Green Belt that could have a significant impact on key purposes and prioritise previously developed and grey belt sites within this designation?	Landscape
Heritage Bradford's rich historic environment contributes to local character, settlement identity, tourism and the local economy. It will be important to protect and enhance the historic environment through well-designed development and appropriate macroplanning, avoiding piecemeal development.	To sustain and, where appropriate, enhance the significance of heritage assets and their setting	• Preserve and enhance the significance of buildings and structures of architectural, cultural and / or historic interest, both designated and non-designated, and their settings? • Preserve and enhance the special interest, character and appearance of conservation areas and their settings?	Cultural heritage

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
Ongoing monitoring of heritage assets and conservation areas, alongside the use of up-to-date design guidance, will be important to ensure new development respects local character and supports the conservation of assets at risk.		• Preserve and enhance the special interest, character and appearance of the Saltaire World Heritage Site and its settings • Conserve and enhance archaeological remains, and archaeologically sensitive areas, and support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Support the conservation and enhancement of heritage assets at risk? • Promote opportunities for celebrating heritage and engaging the local population, in order to enhance the understanding of the historic environment of Bradford? • Support heritage-led regeneration?	
Air quality Poor air quality, particularly from road traffic, remains a significant issue affecting health in Bradford. It will be important for the new Local Plan to support measures to reduce air pollution and emissions, maintain compliance with national standards, and contribute to wider emissions reduction objectives.	To safeguard and improve air quality and reduce the impacts upon human health.	• Minimise traffic congestion and encourage active travel and public transport use? • Ensure new and existing communities are not adversely affected by poor air quality including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development • Ensure the location of new development prioritised within the most sustainable locations of the district	Air, human health

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
		such as the City of Bradford (including Shipley), followed by principle towns, local growth centres and local service centres, in line with the Local settlement hierarchy • Support a reduction in air pollution for key pollutants, including carbon dioxide emissions? • Provide any necessary mitigation measures to reduce impacts to air quality? • Prevent or mitigate adverse air quality impacts from construction and industry activities? • Support compliance with, or improvement beyond, national air quality standards across the District?	
Connectivity: Transport Despite an extensive transport network, parts of Bradford experience congestion, poor connectivity and associated air quality issues. Reliance on external funding for transport improvements and the differing transport needs of urban and rural areas create ongoing challenges to delivering a more sustainable and accessible transport network.	To develop and maintain an integrated, efficient and accessible transport network that maximises access, increases sustainable transport choice, reduces congestion, and reduces the need to travel by private car/ lorry.	• Support the objectives of the West Yorkshire Local Transport Plan? • Ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport? • Reduce the need to travel with sustainable patterns of land use and development? • Be able to deliver the necessary mitigation to reduce its impact on the highways network? • Provide opportunities to improve frequency and availability of public transport services, particularly for the more rural communities?	Material assets, air, human health

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
		• Encourage a modal shift to more sustainable and active forms of travel, such as walking and cycling and use of public transport? • Prioritise sustainable transport options over car and lorry use where possible? • Provide adequate cycle parking and storage options? • Facilitate working from home and remote working?	
Housing Population growth is expected to increase pressure on housing supply and affordability in Bradford. Ensuring an adequate supply of well-designed homes with an appropriate mix of housing types and supporting infrastructure presents an opportunity to meet changing housing needs and support the development of sustainable, inclusive communities.	To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups.	• Increase the number of additional homes delivered to meet local needs? • Provide affordable homes of the right size and tenure to meet local needs? • increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care) • increase the delivery of the right size of housing to address local needs, including family sized housing (three bed or more)? • increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range of users/occupants; such as those with disabilities, wheel chair users and families with children?	Population, material assets

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
		• Increase delivery of accommodation for those groups who require specialist care and support • Provide appropriate accommodation for gypsy and traveller communities and other specialist groups?	
Connectivity: Sustainable community growth Population growth and demographic change will increase demand for healthcare, community facilities, accessible housing and supporting infrastructure across Bradford. Responding to existing inequalities and ensuring communities have good access to services, green infrastructure and safe, healthy environments will be important to supporting sustainable and inclusive growth.	To ensure that communities have good access to a range of good quality services and connections to wider social, environmental and economic networks.	• Facilitate good access to healthcare, social, recreational and leisure facilities for all sectors of the community? • Enhance multifunctional green infrastructure networks and connectivity throughout the plan area? • Enhance multifunctional green infrastructure networks and connectivity throughout the plan area? • Improve access to green spaces, open spaces, the countryside and leisure and recreation facilities? • Support healthy / active and inclusive environments? • Support the creation of cohesive, connected communities?	Population, human health, material assets, biodiversity, flora, fauna, air
Equality Inequalities in health, deprivation, housing and social outcomes exist across Bradford, with some	To support equality and diversity, whilst promoting social cohesion, encouraging participation and improving the	• Reduce inequalities and deprivation across the plan area?	Population, human health, material assets,

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
communities and minority groups experiencing greater disadvantage than others. Coordinated, design-led growth provides an opportunity to improve quality of life and deliver more inclusive communities across the district.	quality of life (particularly in deprived neighbourhoods).	• Improve equality of opportunities amongst the groups most in need? • Promote, strengthen, and enhance placemaking principles? • Protect and provide improved local, social, recreational and leisure facilities and access to the natural environment? • Ensure an appropriate mix of dwelling sizes, types, and tenures to meet the needs of all sectors of the community? • Support the ageing population to ensure they do not become socially excluded? • Ensure there is adequate provision of facilities and services for minority groups?	biodiversity, flora, fauna
Health and wellbeing Health outcomes in Bradford are currently poorer than national averages, with health inequalities linked to deprivation, ethnicity and where people live. The new Local Plan presents an opportunity to improve physical and mental health - addressing obesity, increasing physical activity and improving access to health and social care for all communities across the district.	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 create good cultural, leisure and recreation activities available to all. To improve safety and security for people and property.	• Support healthy / active and inclusive environments? • Provide formal and informal, and natural play spaces for children which are safe and easy to access? • Improve physical and mental health outcomes for existing and future residents? • Reduce health inequalities, particularly within the district's most deprived communities? • Improve access to healthcare facilities, community services and social infrastructure?	Human health, population, biodiversity, fauna, flora, material assets, air

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
		• Create safe, inclusive and accessible places that promote social interaction, wellbeing and community cohesion? • Reduce the potential for adverse effects on health arising from environmental factors, including poor air quality, noise and pollution?	
Economy and employment Bradford has a diverse economy and strong entrepreneurial base, but continues to face challenges including skills gaps, socio-economic deprivation, employment land constraints and pressures on the vitality of the city centre. Delivering strategic, coordinated growth through the new Local Plan provides an opportunity to strengthen economic resilience, attract investment and support sustainable business growth across the district.	Increase the number of additional jobs delivered, particularly for high-skilled/paid employment opportunities. Ensure that job opportunities are suited to the needs of the local workforce across all age groups, as well as providing new opportunities for training and education To deliver economic growth through attracting significant investment to provide new/enhance employment floor space, new development within regeneration areas and town centres, as well as through the	• Support the creation of new jobs, particularly high value and skilled economic sectors. • Ensure new employment opportunities are located within accessible locations to the districts population, particularly those living within most deprived areas encourage developers to demonstrate how they are investing in skills and employing local people. • Ensure the capacity of educational facilities keep pace with population growth? • Protect and retain an adequate supply of employment floor space to address business needs? • Support the redevelopment / intensification of existing employment land to provide additional and high-quality employment floor space? • Safeguard existing town centres and support their vitality?	Population, material assets

Table 9.1 IA Framework & summary key issues

Summary of key issues for IA Themes	IA objectives	Supporting questions… Will the plan ?	SEA Directive topics
	expansion of existing businesses.	• Maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment? • Promote a green economy and decarbonisation? • Promote the vitality of rural economies?	

Methods

9.1.3 Appraisals will be undertaken by qualified professionals in impact assessment and plan-making, employing the following methods:

- Drawing upon information within the scoping reports in relation to baseline data, trends, sensitive environmental receptors and key sustainability issues. Where updated data is available, this has been used proportionately where possible.
- Utilising Geographical Information Systems (GIS) to identify spatial features, environmentally sensitive areas, socio economic factors and relationships between development locations and likely effects.
- Cross referencing information from supporting pieces of evidence.
- Utilising information gathered from site / location visits undertaken by council officers and consultancies.

9.1.4 Appropriate methods will be applied at different stages of assessment to ensure proportionate, consistent and relevant conclusions are reached.

Appraisal of the Plan

9.1.5 Each Plan policy will be considered in the appraisal, but the findings will be discussed on a 'whole plan' basis (rather than commenting on every policy individually in the plan appraisal section). This is important as policies should be read in the context of the whole Plan and not in isolation. Policies can interact with one another to create cumulative effects, synergistic effects and to help mitigate potential negative effects. Where this is the case, such factors will be discussed in the appraisal findings, including reference to individual policies as relevant.

9.1.6 To aid in interpretation, of the overall findings, a matrix will be included as an appendix that concludes on the broad implications of each policy (i.e. whether it is broadly positive, negative or neutral). As outlined above, it is not necessary to determine the significance of individual policies, but this 'policy screening' exercise allows for a focus on policies that are likely to be more relevant for the different IA topics.

9.1.7 To determine the significance of effects, account will be taken of a range of characteristics referred to in Schedule 2 of the Regulations. This includes magnitude, duration, frequency, likelihood, permanence. and timescale. The potential for cumulative and synergistic effects is also considered by taking account of how the different proposals within the Plan interact. Consideration will also given to the interaction of the Plan with other plans, policies and programmes that affect the baseline position.

9.1.8 The characteristics of effects will be discussed in the appraisal text in a proportionate manner, only where relevant to help conclude on the significance of effects. As discussed above, it is not considered to be appropriate to conclude on the significance of effects for individual elements of the Plan (i.e. for individual policies).

9.1.9 It can therefore be assumed that where effects are not discussed within the appraisal text for certain policies, that these are not important factors in determining overall significance. Likewise, it is not proportionate or necessary to go through a 'tick box' exercise for every effect characteristic to conclude on significance.

9.1.10 Taking account of the above factors, a conclusion will be reached for each IA Topic with regards to the significance of effects, ranging from neutral, minor, moderate, and major. The table below sets out the scale that will be used to record effects.

Major positive	+++		**Major negative**	---
Moderate positive	++		**Moderate negative**	--
Minor positive	+		**Minor negative**	-
Neutral	0		**Uncertainty**	?

Appraisal of strategic alternatives

9.1.11 Each strategic alternative will be assessed against the IA framework topics / objectives, using the guiding questions to prompt exploration and discussion of effects. It is not intended to present an answer for every individual question, but rather to conclude on how the alternatives perform in relation to achieving objectives (being guided by the prompts considered together, rather than individually).

Appraisal of individual site options

9.1.12 A bespoke range of criteria and thresholds have been used to assess individual site options, aligned with the Council's own Site Assessment and Selection Methodology. These criteria are aligned with the SA Framework objectives, but are articulated in a way that assists with identifying site-level characteristics (being mindful that the SA framework is strategic in nature). The full range of detailed criteria is available within the Councils wider site assessment and selection report.

10. Next steps and consultation

Consultation on the Scoping Report

10.1.1 Public involvement through consultation is a key element of the IA process. There have been several rounds of consultation on scoping elements as the plan has progressed. This updated scoping report will be appended to the full IA Report as the plan and IA assessments are finalised for Reg19 consultation.

10.1.2 The SEA Regulations require scoping consultation to take place with statutory consultation bodies but not full consultation with the public. The statutory consultation bodies are the Environment Agency, Historic England, and Natural England.

10.1.3 The statutory bodies (and wider public) have had the opportunity to comment on scoping elements of the IA several times across the plan making process. However, there have been some substantial updates made to account for new evidence and the passage of time. This has also led to a change in the key issues and a reconsideration of the approach to undertaking assessments at this stage of IA.

10.1.4 It is recognised that consultees have already provided comprehensive comments on previous scoping exercises (and we have actioned those in this update). However, consultees are invited to comment further on the content of this scoping report update.

10.1.5 All comments received on the scoping report will be reviewed and will influence the refinement of the IA where appropriate (being mindful that the Council is at the latter stages of plan making and this would most likely need to be undertaken through the examination stage).

APPENDIX C Maps of the housing growth and distribution alternatives (Reg19 Stage)

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

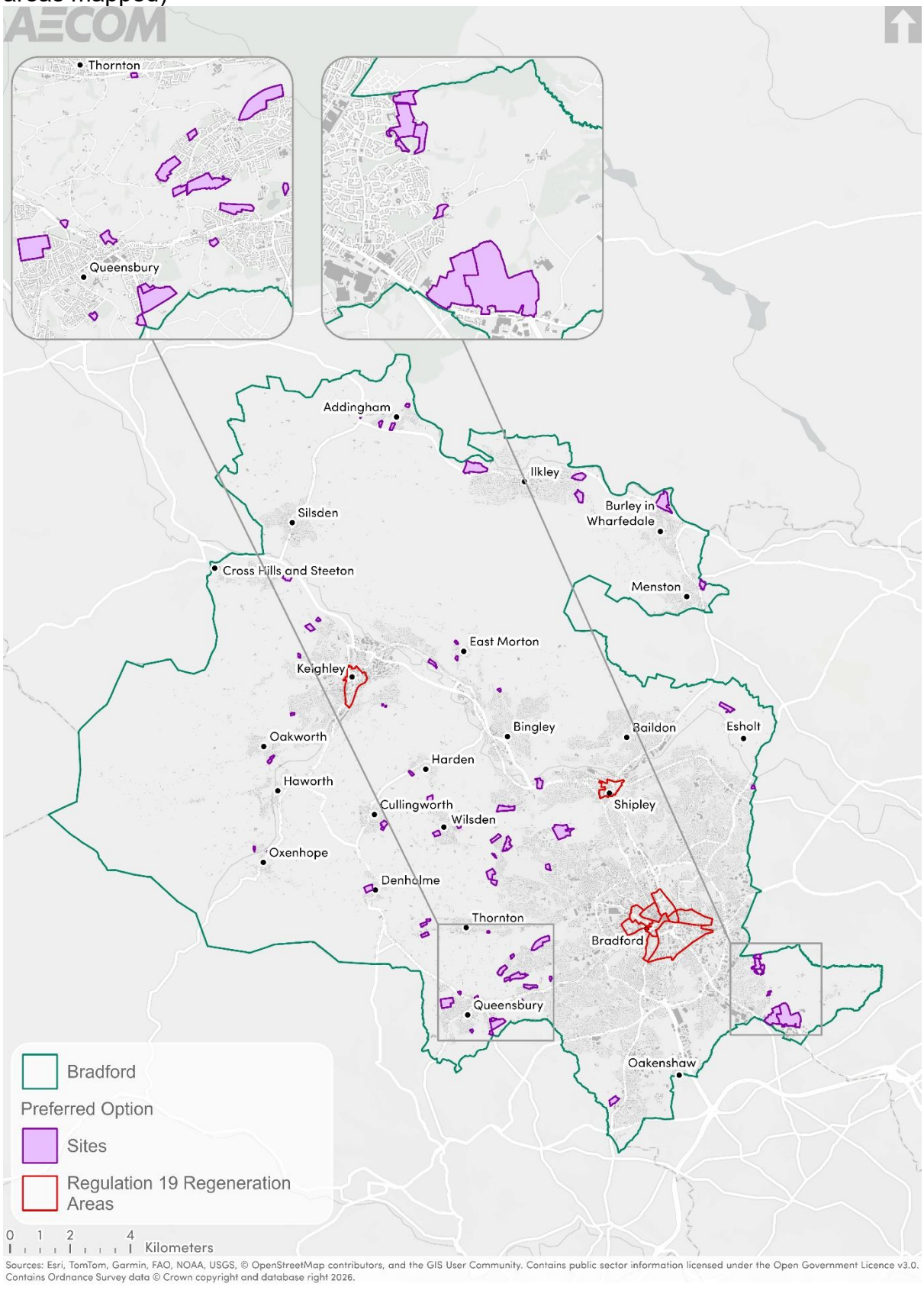
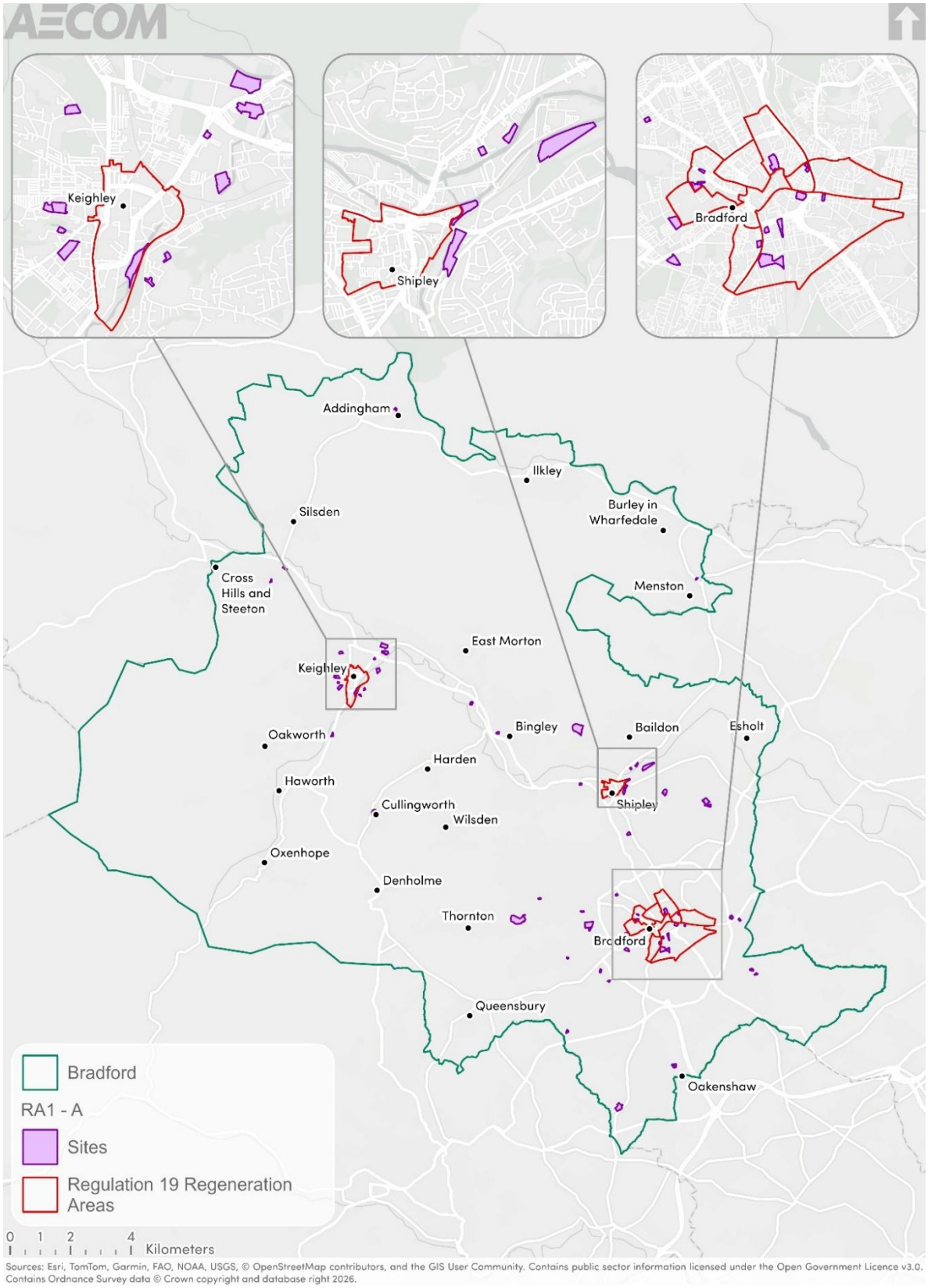
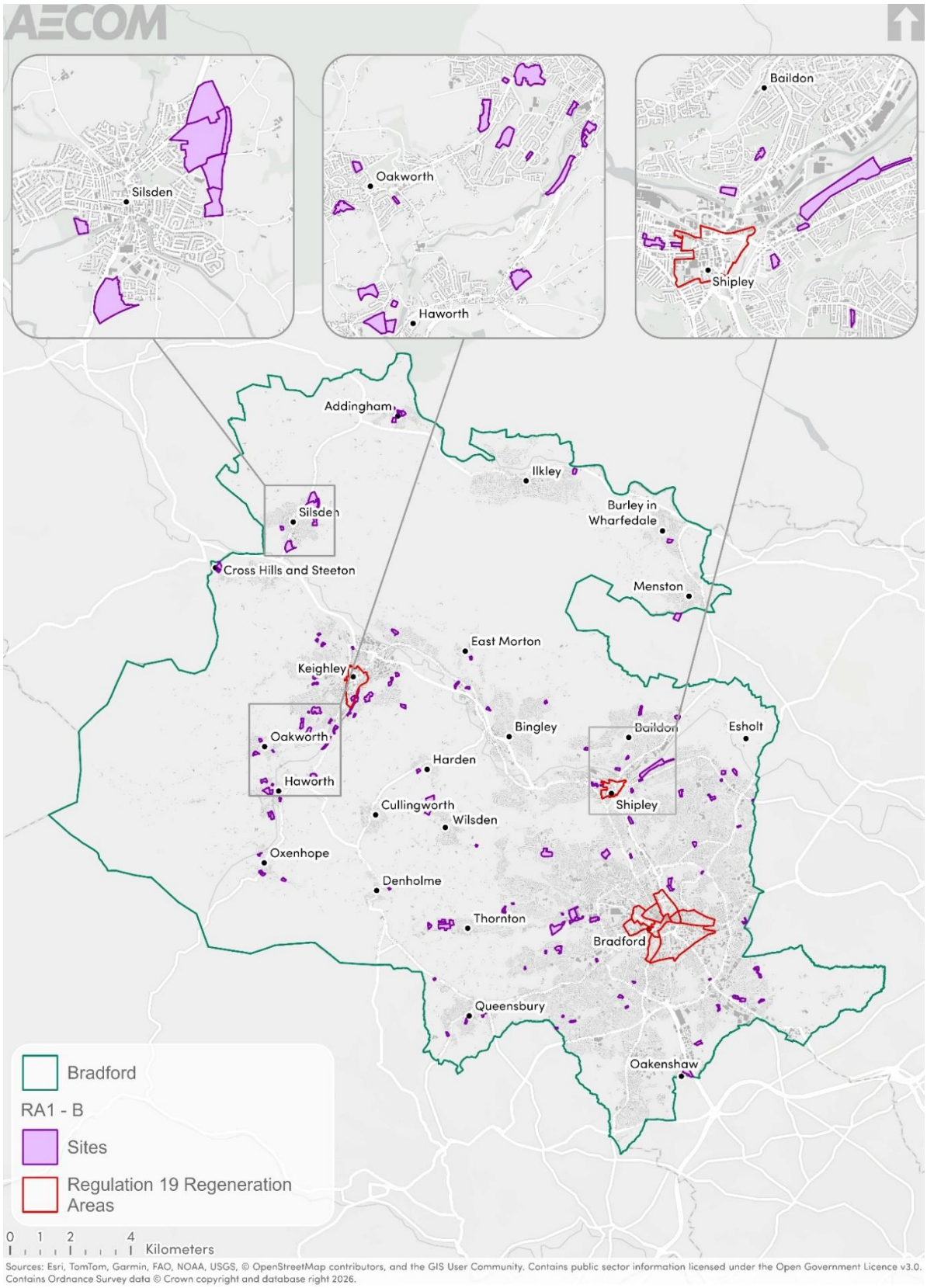


Figure 2: RA1A**: Urban intensification through previously developed land** (variable / residual sites and regeneration areas mapped)



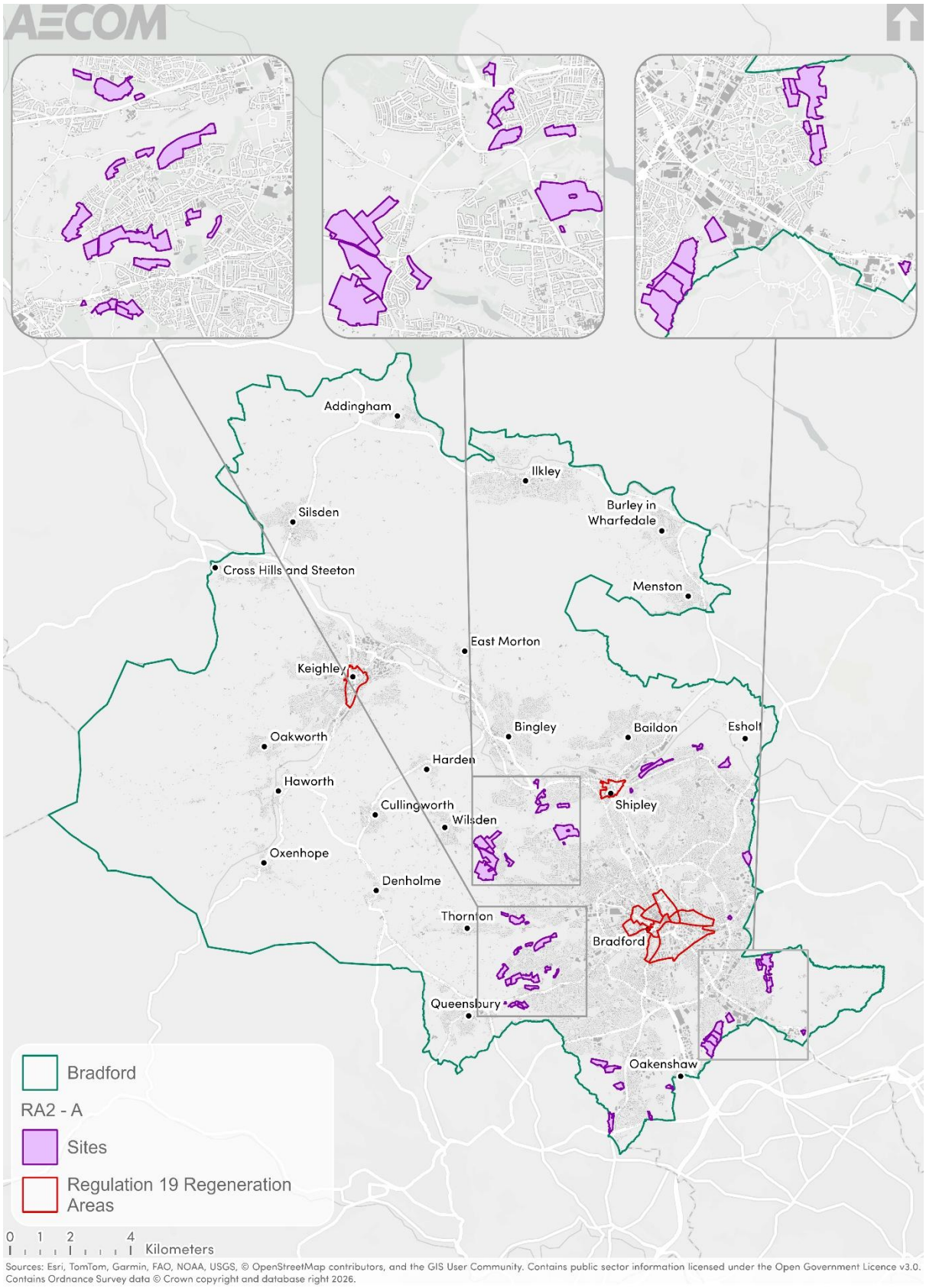
Nb: Sites may include land not included for housing in some cases and land included for other land uses in the Preferred Option.

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.

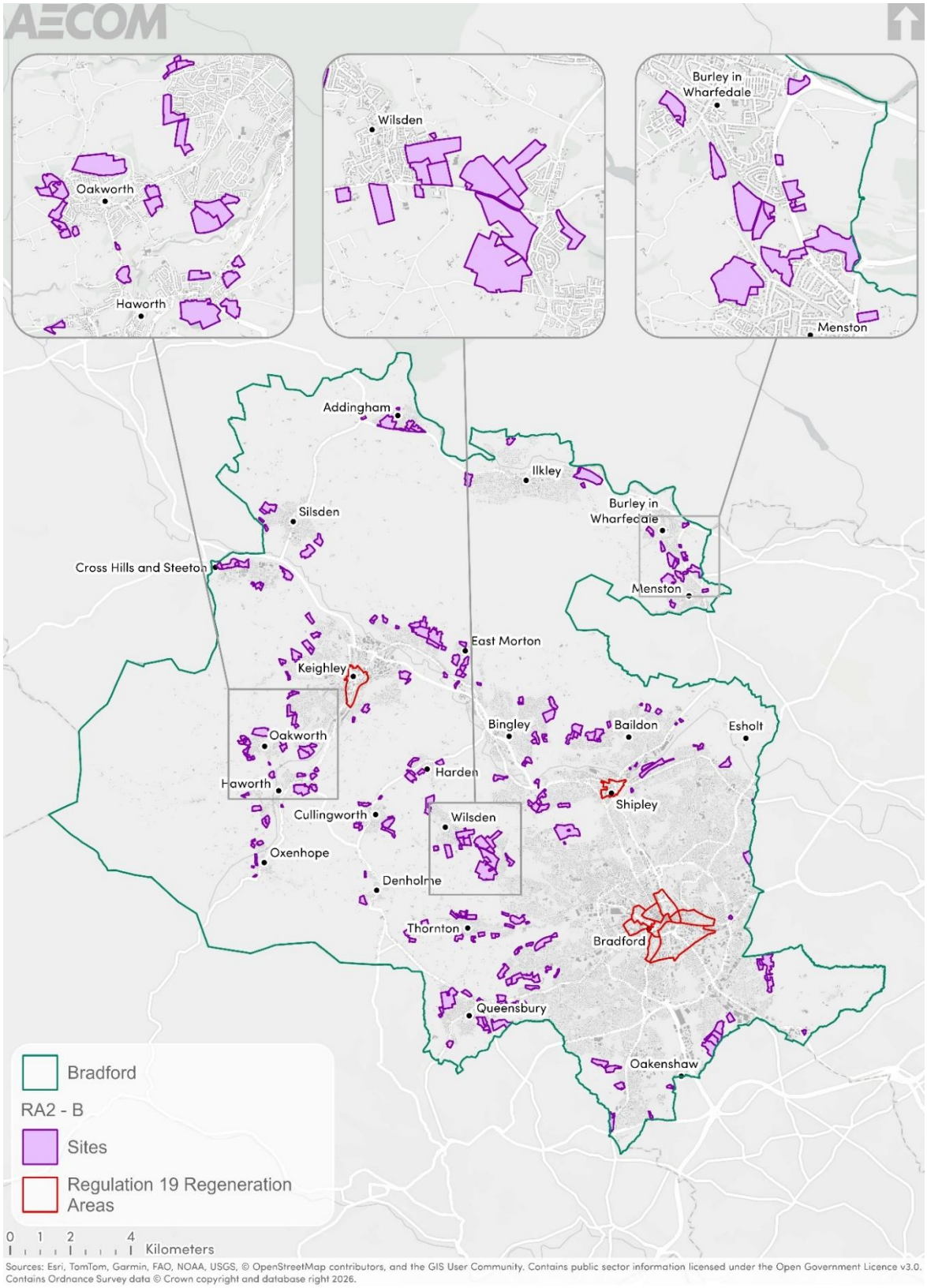
Figure 4: RA2A **Urban edge expansion around Bradford** (variable / residual sites and regeneration areas mapped)



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**

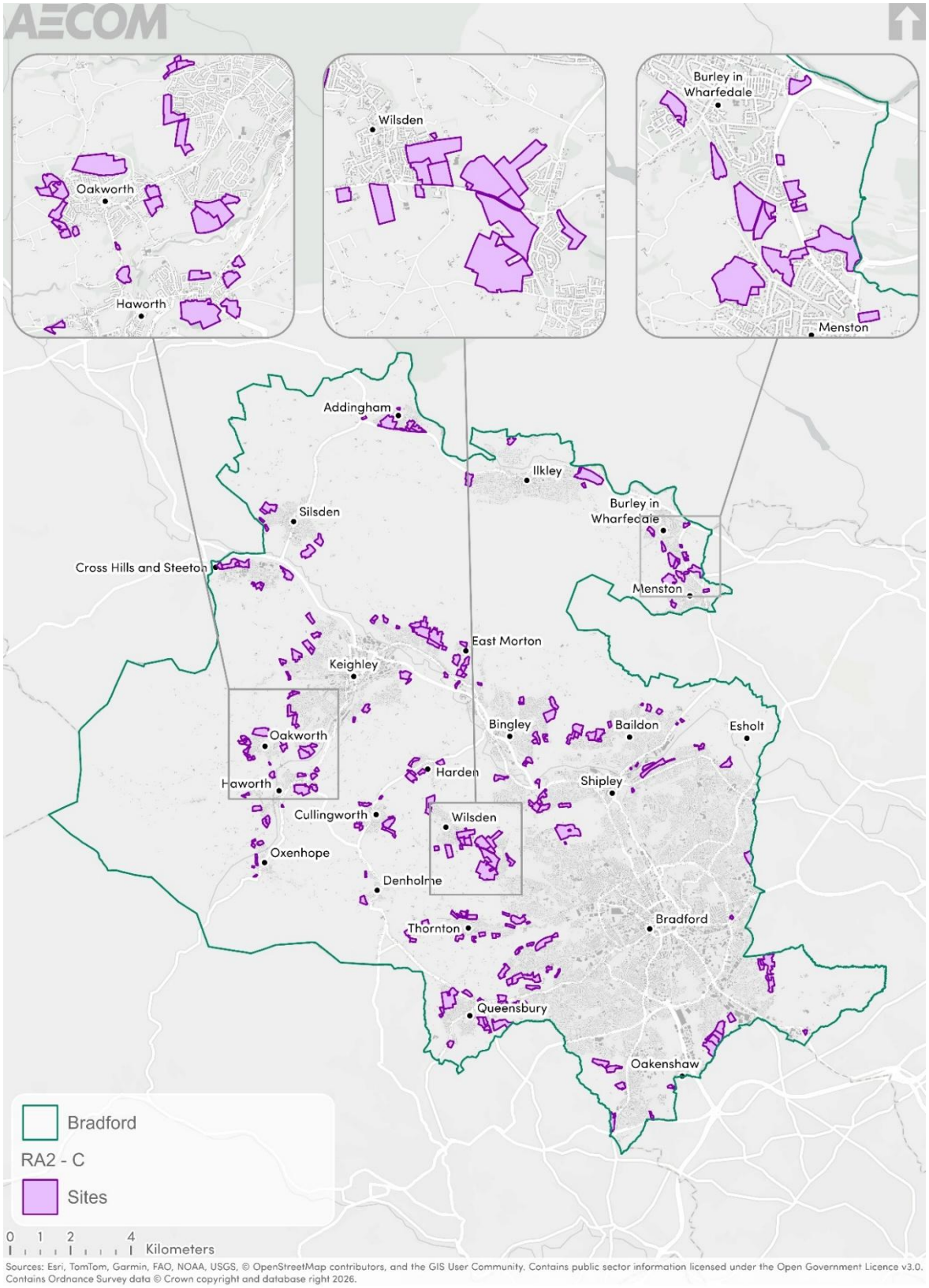
(variable / residual pool of sites and regeneration areas mapped)



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.

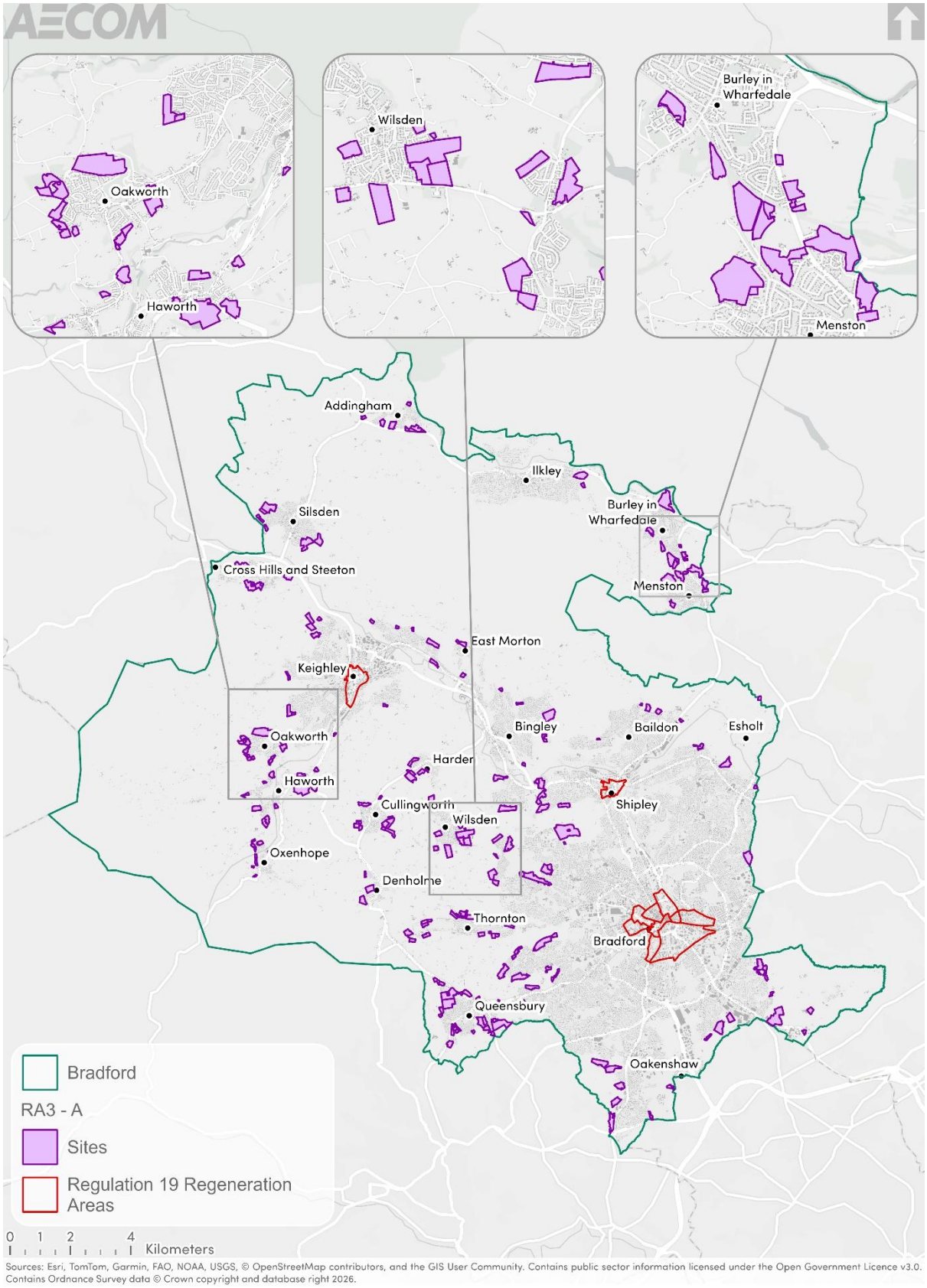
Figure 6: RA2C **Urban edge expansion without reliance on Regeneration Areas**

(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.

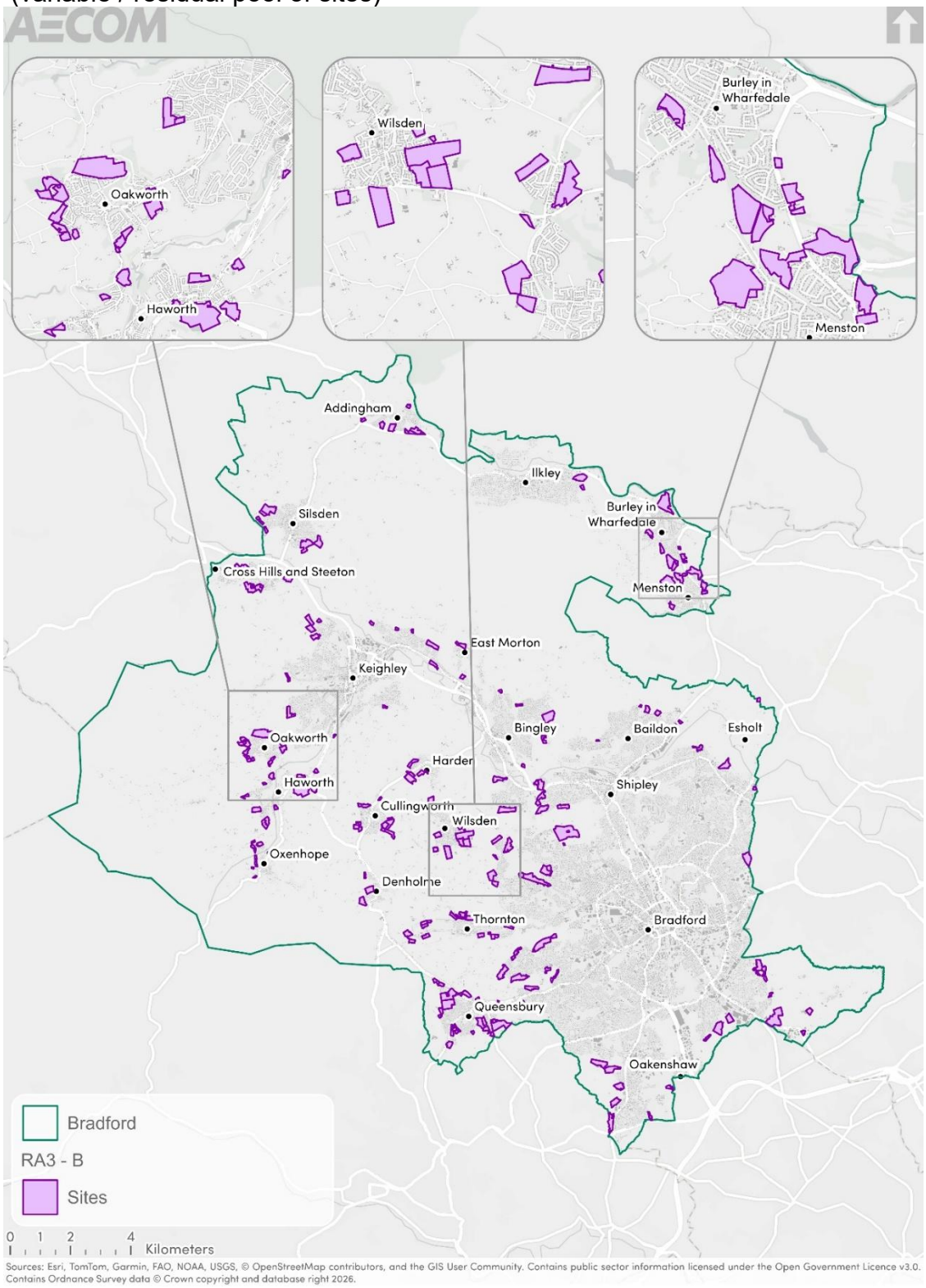
Figure 7: RA3A **Grey Belt-led strategy** (variable / residual pool of sites and regeneration areas mapped)



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