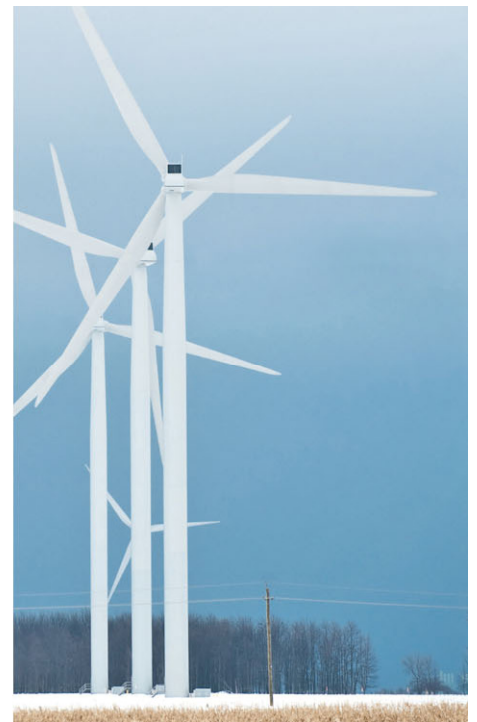


Bradford Metropolitan District Council

Sustainability Appraisal of the Bradford Core Strategy Submission Draft

Sustainability Appraisal Report - Non Technical Summary



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AMEC Environment & Infrastructure
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Non Technical Summary

1.1 Purpose of this Report

This document is the non-technical summary of the sustainability appraisal of the ‘City of Bradford Submission Draft Core Strategy’. It highlights the sustainability appraisal (SA) process and describes the key sustainability effects anticipated as a result of the different options and policies outlined in the Submission Draft Core Strategy. It summarises the findings of the Sustainability Appraisal Report, which will be published to accompany the Submission Draft Core Strategy for public consultation.

1.2 City of Bradford Core Strategy

The City of Bradford Metropolitan District Council is currently in the process of preparing a Local Plan to guide future growth and development in the District (see (www.bradford.gov.uk/planning)). This will replace the existing Replacement Unitary Development Plan for Bradford (RUDP), adopted in October 2005. The Core Strategy is the first Development Plan Document (DPD) to be produced. It provides the long term spatial vision for the District and the strategic policies to deliver that vision. The Core Strategy will then inform the other DPDs to be produced as part of the Local Plan.

The development of the Core Strategy reflects a considerable body of work. An Issues and Options Paper was issued in January 2007 which sought to identify the broad issues faced by the district and the options and alternatives to address these. This has been followed by a Further Issues and Options report in February 2008 and a Further Engagement Draft in October 2011. Community involvement and engagement has taken place at each stage to ensure that the Council produces a plan that meets the needs of all its stakeholders and the local community.

The Submission Draft Core Strategy:

- Sets out the broad aims and objectives for sustainable development within the Bradford District for the next 15-20 years until 2030;
- Set out broad policies for steering and shaping development;
- Set out broad locations for new housing and employment growth and infrastructure investment;.
- Co-ordinates the policies and plans of its partner organisations’; and
- Takes account of national and regional policy and the Council’s aims in the 2020 Vision and The Big Plan – the Sustainable Community Strategy.

The Vision for Bradford in the Submission Draft Core Strategy is that by 2030 *‘the Bradford District has become a key driver of the Leeds City Region’s economy and a much sought after and desirable location where people*

want to live, do business, shop and spend their leisure and recreation time.... This growth has driven the economic and social transformation of the district. Sustainable development and management has been at heart of this growth and prosperity. The District's unique landscapes, heritage and biodiversity assets have played a vital role in making great places that encapsulates what makes Bradford so special. Economic transformation of the district has been achieved based on Bradford's key strengths of its unique young, growing and international workforce as well as its culture of entrepreneurship, high quality places where businesses can thrive and its rich historic and cultural identity and wealth of environmental assets'.

The Spatial Vision for Bradford district will be achieved through 16 strategic objectives and 66 policies contained in 9 thematic chapters:

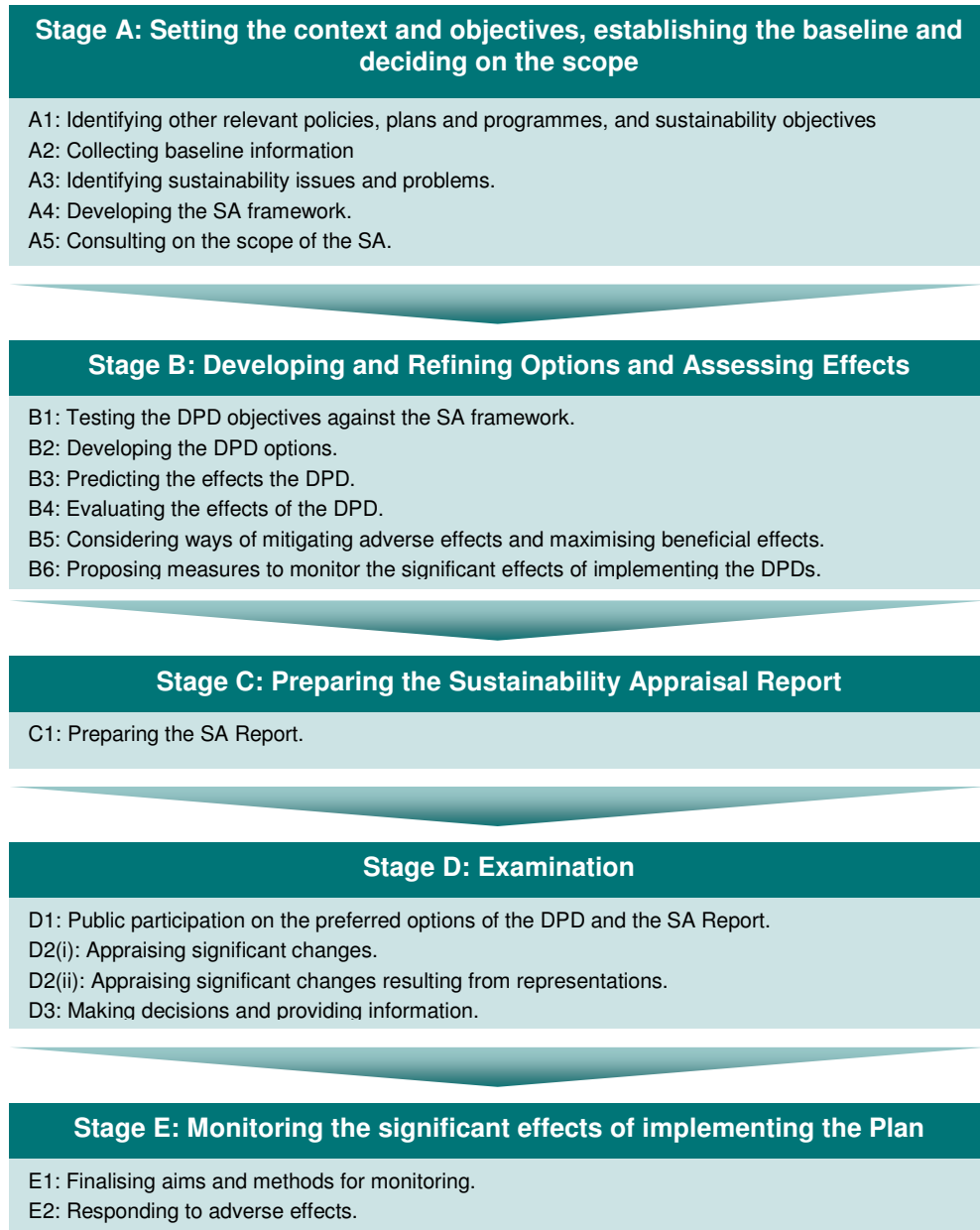
- Strategic Core Policies (9 policies);
- Sub Area Policies (10 policies);
- Economy (5 policies);
- Housing (12 policies);
- Transport (8 policies);
- Environment (8 policies);
- Minerals (4 policies);
- Waste (2 policies);
- Design Implementation (8 policies).

The Vision, Plan Objectives and Policies have been assessed in this appraisals against 19 SA objectives (see **Table NTS 1**) to ensure that likely social, economic and environmental effects are identified, described and assessed.

1.3 Sustainability Appraisal

It is important to ensure that the objectives and policies contained within the Core Strategy contribute to the aims of sustainable development. This is commonly defined as ensuring that there is a better quality of life for everyone now and in the future. To this end, the Submission Draft Core Strategy has been subjected to a process called sustainability appraisal (SA), the main stages of which are highlighted in **Figure NTS 1**. SA considers the anticipated effects of the Core Strategy on the area's environmental, economic and social conditions. Sustainability Appraisal of Local Development Documents (including the Core Strategy) is a requirement under Section 19(5) of the Planning and Compulsory Act 2004. In meeting this requirement, local planning authorities must also address the requirements of the European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the Strategic Environmental Assessment (SEA) Directive. This is a law that sets out to integrate environmental considerations into the development of plans and programmes.

Figure NTS 1 Stages in the SA Process



1.3.1 Sustainability Appraisal Undertaken to Date

AMEC undertook an initial appraisal of the options detailed in the Core Strategy Issues and Options Paper (February 2007) and the Core Strategy Further Issues and Options for Consultation (Spatial Vision and Strategy) paper in February 2007 and January 2008 respectively. To further supplement this, and to ensure that opportunities for sustainability were maximised, AMEC undertook a further appraisal of the options between February and March 2009, and refined Core Strategy Options were subsequently produced with attendant policies for additional consultation (September 2011).

AMEC then undertook Sustainability Appraisal of the Bradford City Council Core Strategy Further Engagement Draft (September 2011) to help Bradford take forward sustainable policies for the Submission Draft Core Strategy.

1.3.2 Sustainability Appraisal Objectives

The appraisal of the Vision, Objectives and Policies of the Submission Draft Core Strategy has been undertaken considering the likely effects in the short, medium and long term. Each element of the Core Strategy has been scored against each of the 19 SA objectives which were developed in conjunction with the Council in November 2008. The SA objectives reflect the key sustainability issues for the district derived from an analysis of the baseline and a review of plans and programmes. They also reflect comments received by the statutory consultees during scoping on the appraisal in February 2007.

Table NTS1 Core Strategy SA Objectives

Impacts on the environment and resources	Social impacts	Economic impacts
1. Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	8. Provide the opportunity for everyone to live in quality housing which reflects individuals' needs, preferences and resources	17. Promote education and training opportunities which build the skills and capacity of the population
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled, and recovered	9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	18. Increase the number of high quality job opportunities suited to the needs of the local workforce
3. Reduce the district's impact on climate change and vulnerability to its effects	10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area
4. Safeguard and improve air, water and soil resources	11. Improve the quality of the built environment and make efficient use of land and buildings	
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	12. Improve the quality and range of services available within communities and connections to wider networks	
6. Maintain and enhance the character of natural and man made landscapes	13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	
7. Protect and enhance historic assets and their settings	14. Create good cultural, leisure and recreation activities available to all	
	15. Improve safety and security for people and property	
	16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	

In order to assess the impacts of the Submission Draft Core Strategy policies against the SA objectives, the following scoring system has been used.

KEY	--	Move away significantly	-	Move away marginally	+	Move towards marginally	++	Move towards significantly	0	Neutral	?	Uncertain
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It should be noted that the scores are only intended to serve as an indication to the types of effects that may occur based on the level of information considered.

1.4 Developing and Appraising the Spatial Options

The spatial option has been developed through the various stages of the Core Strategy. The preferred option is a hybrid of the previous options, which focuses developments on previously developed land, although it does make provision for greenbelt reviews where development locations are sustainable. It highlights economic growth regeneration areas in the Regional City, as well as some new housing in the principal towns, local growth centres and local service centres. This option therefore seeks to achieve a more sustainable pattern of housing provision across the District, provided that the apportionment would ensure that local and affordable housing need would be met in Local Growth Centres and Local Service Centres. Central to the approach is the need to maximise the efficient use of land, based on principles for selecting wherever possible sites accessible to a range of services and community facilities, and quality public transport services; prioritising allocation of sites that would assist in regeneration or environmental improvement; and avoiding wherever possible sites that would cause significant harm to character or setting or key environmental assets including those with landscape, wildlife and biodiversity, archaeological and architectural value.

A key element of the emerging Core Strategy is the way in which it seeks to meet its growth requirements, whilst at the same time protecting and enhancing existing environment, social and economic conditions. The overall approach seeks to promote urban development, making best use of existing services and brownfield land, whilst recognising that a part of a sequential approach, a requirement for greenfield land is likely to be necessary.

1.5 Vision, Draft Objectives and Draft Policy Appraisal Results

The Vision and draft Plan Objectives were tested for their compatibility with the SA objectives.

The Vision aims for '*growth [that] has driven the economic and social transformation of the district [with] sustainable development and management at [the] heart of this growth and prosperity*'. The growth of the City of Bradford and the towns along Airedale and Wharfedale will be supported by a significant increase in the delivery of new houses, both market and affordable.

The Vision is anticipated to have a positive effect against many of the SA objectives including: Housing, Transport, Access to Services, Social Cohesion, Employment, Economy and Investment.

However, the Council's Vision leaves room for uncertainties, as potential for negative as well as positive effects has been identified. This includes the conflicts that could arise between growth (economic and visitor growth) and environmental factors (such as the loss of greenbelt land in particular). The effects are highly dependent on whether growth is achieved under consideration of economic, social and environmental sustainability.

The compatibility test identified that several of the proposed objectives are compatible with at least one of the SA objectives, and in the majority of cases one or more of the spatial objectives are considered to be highly compatible with at least one of the SA objectives. The exceptions are SA objectives 15, 18 and 19. Although several of the proposed spatial objectives are partially compatible with these SA objectives as they generally support the SA objective, none are highly compatible.

The compatibility of spatial objectives 1 to 8 with the majority of the SA objectives is uncertain, as these spatial objectives promote and/or are likely to result in new development, which, depending on its design, type and location, could potentially have a positive and/or negative environmental or social impact. In addition, several of the spatial objectives do not relate with the SA objectives, which reflects the specific nature of each objective.

Spatial objective 9 has been identified as being partially incompatible with SA objectives 1, 3 and 4 as it promotes development of highway systems and in turn could encourage greater vehicle (and in turn greater use of finite fossil fuel reserves, an increase in greenhouse gas emissions and impacts on air quality). In addition, spatial objective 1 is partially incompatible with SA objective 11 relating to the efficient use of land and buildings, as it promotes development in Airedale and Wharfedale, which would involve use of greenfield land. Notwithstanding this, these issues are covered within several of the other proposed spatial objectives and therefore no amendment to spatial objectives 1 and 9 to address these conflicts is considered necessary.

1.5.1 Policies

Table NTS 2 summarises the results of the appraisal by showing anticipated effects of the draft policies grouped by thematic topic.

SA Objective	Strategic Core Policies		Sub Area Policies		Economy	Housing	Transport	Environment	Minerals	Waste	Design	Implementation			
1. Ensure the prudent and efficient use of natural resources	++	+	0		++	0	++	-	+	0	?	0			
2. Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered	+	++	0	+	0	0	-	?	++	0	+	?			
3. Reduce the district's impact on climate change and vulnerability to its effects	+	0	++	0	0	++	++	0	+	0	+	?			
4. Safeguard and improve air, water and soil resources	+	0	+	-	?	?	+	?	++	?	+	0	+	?	
5. Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	++	++	?	?	?	++	++	+	0	+	0	+	?		
6. Maintain and enhance the character of natural and man made landscapes	+	0	++	+	?	+	?	0	++	+	0	+	?		
7. Protect and enhance historic assets and their settings	+	0	++	0	?	?	0	++	0	?	+	++	+	?	
8. Provide the opportunity for everyone to live in quality housing which reflects individuals needs, preferences and resources	++	++	+	++	0	0	+	0	++	+	?	+	?		
9. Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts	++	++	0	0	++	0	0	0	0	0	+	?			
10. Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car	++	++	+	+	++	0	?	0	0	0	++				
11. Improve the quality of the built environment and make efficient use of land and buildings	++	+	-	+	-	+	-	-	0	++	+	0	++	+	-

SA Objective	Strategic Core Policies		Sub Area Policies								Implementation
	Economy	Housing	Transport	Environment	Minerals	Waste	Design	Implementation			
12. Improve the quality and range of services available within communities and connections to wider networks	++	++	++	0	+	0	0	0	0	0	++
13. Provide social cohesion, encourage participation and improve the quality of all neighbourhoods	++	++	+	++	+	+	0	0	++	++	++
14. Create good cultural, leisure and recreation activities available to all	+	0	++	0	0	0	++	0	0	0	+
15. Improve safety and security for people and property	+	+	0	0	0	0	0	0	0	++	+
16. Provide the conditions and services to improve health and well-being and reduce inequality to access and social care	+	++	?	+	++	++	0	0	0	0	+
17. Promote education and training opportunities which build the skills and capacity of the population	+	++	++	?	0	0	0	0	0	0	++
18. Increase the number of high quality job opportunities suited to the needs of the local workforce	+	++	++	?	0	0	?	0	0	0	++
19. Support investment and enterprise that respects the local character and needs of Bradford and the wider area	+	++	++	?	+	0	?	0	0	0	++

It is anticipated that the Submission Draft Core Strategy Policies will have positive effects on a number of the SA objectives. In particular there will be significant positive impacts in relation to the following objectives:

- Reducing the district's impact on climate change;
- Protecting and enhance historic assets and their settings;
- Providing the opportunity for everyone to live in quality housing which reflects individuals needs, preferences and resources;
- Developing and maintaining an integrated and efficient transport network which maximizes access whilst minimising detrimental impacts;
- Reducing congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car;
- Promoting education and training opportunities which build the skills and capacity of the population;
- Increasing the number of high quality job opportunities suited to the needs of the local workforce;
- Supporting investment and enterprise that respects the local character and needs of Bradford and the wider area.

The Submission Draft Core Strategy will mainly have a mixture of positive and uncertain impacts on the environment. The policies afford significant protection to the South Pennine Moors SAC and SPA, which is welcome given the environmental importance of this sensitive area and seeks to protect and enhance the historic environment in Bradford, including seeking to manage visitor pressure particularly in relation to Saltaire.

Uncertain environmental impacts relate to the exact locations of some development (for example housing, some employment land and minerals sites) will be identified in other forthcoming documents, including the Site Allocations and Area Action Plan Documents, making it difficult to quantify impacts at this stage.

In the main any negative impacts from the policies relate to the need for some local greenbelt releases which have been identified in a number of the policies. However, it is recognised that in order to meet development needs in Bradford, some greenbelt releases will be unavoidable and that will help to ensure that new development is in sustainable locations.

1.5.2 Mitigation

Whilst the Submission Draft Core Strategy has largely significant positive impacts against the SA objectives, there are a number of areas where the current draft policies could be revised and amended to produce an improved performance against the sustainability appraisal objectives (or to improve clarity) to aid implementation. These are summarised in **Table NTS3**.

Table NTS3 Suggested Mitigation Measures and Policy Wording Amendments

Policy	Suggested Mitigation
P1	The policy as worded does not reflect the distinctive nature of Bradford and appears to be a reiteration of the NPPF's presumption in favour of sustainable development. Further consideration should be given to the policy wording to ensure that the policy articulates what sustainable development means for Bradford and how it will be applied locally.
SC1	The policy does not have a positive impact in relation to SA objective 2 on waste. Consideration should be given to including a reference to sustainable design or sustainable resource use in policy objective 10, to enable waste management to be addressed.
SC2	The policy wording could be strengthened to include a reference to moving waste up the waste hierarchy as it is currently focused on energy rather than material resource. The reference to waste could be added to the wording of Policy D requirement to use resources sustainably.
SC3	Consideration should be given to rewording the policy to place less emphasis on the road network. Suggested wording is as follows "make the best use of sustainable modes of transport, including existing and enhanced bus, rail, cycle, foot and water transport links as a priority but also considering the use of existing inter-city regional road links".
SC4	<p>Consideration should be given to address the following in the policy:</p> <ul style="list-style-type: none"> • Improvements to public transport links are promoted in the Local Service Centres and walking and cycling encouraged in the Principal Towns, Local Growth Centres and Local Service Centres. Given that local services/facilities are limited in some locations, without these improvements residents may therefore have to travel by car to access certain services/facilities and employment elsewhere. • A similar design priority as that for the Regional City, Local Service Centres and Rural Areas could be adopted for the other settlements.
SC5	<p>Consideration should be given to amending the policy in order to clarify the potential conflict and hierarchy between brownfield land or infill land that is either within the floodplain, of high value biodiversity, supporting historic assets, or supporting existing leisure and recreation activities and greenfield land that is not.</p> <p>In terms of consistency of policy wording, it is suggested that the policy wording of the last paragraph under the Principal Towns sections is amended to read: "Planning decisions as well as plans, strategies, investment decisions and programmes should: ...".</p>
SC9	Consideration should be given to providing appropriate background and justification text to be prepared and inserted to support this policy and provide a context for it.
EC2	Consideration should be given to rewording the policy itself or in the supporting text that explains the reasoning behind the 2782 jobs as this figure is above the REM forecast and the historical trend for Bradford. It is also recommended that the policy or the supporting text makes clear how the annual target figure for employment land of 17ha relates to the total figure of 135ha. 17ha per annum of employment land would lead to a total employment land requirement of greater than 200ha (depending upon the assumed start date of the plan).
TR1	This policy includes for provision in an accessible manner of the infrastructure associated with lower emission vehicles. Consideration should be given to rewording the policy to include reference to developing an integrated transport network.
HO1	The use of construction best practice would help to mitigate adverse environmental impacts of delivering the scale of housing required. Consideration should be given to either a specific policy covering sustainable construction or a commitment to completing a Supplementary Planning Document covering this requirement.
HO5	Consideration should be given to rewording the policy to allow for a higher density target in urban areas, in order to maximise use of PDL and to make the best use of sustainable urban locations? Consideration should also be given to whether a higher density figure than 30dph could be achieved?
HO6	<p>In the Further Engagement Core Strategy Draft there was a target for 60% PDL. Consideration should be given to whether the policy could be revised upwards from 55% in order to be consistent with the attempt to have the maximum number of homes sited on PDL?</p> <p>Consideration should be given to rewording the policy to ensure that sites allocated for housing will not adversely impact upon the historic environment.</p>
HO7	Consideration should be given to rewording the policy to ensure that sites allocated for housing will not adversely impact upon the historic environment.
EN3	Consideration should be given to rewording the policy to state for the avoidance of doubt what Bradford's Heritage assets are. At present it is unclear whether it covers all forms of designations or is intended to cover cultural heritage

Policy	Suggested Mitigation
	assets more widely across the whole of the built environment.
ID3	Consideration should be given to rewording the policy to include a requirement for offsite contributions where viability issues or other factors may make onsite contributions difficult to achieve for new developments, for example with affordable housing. This would help to ensure that there are benefits for Bradford even where there are no onsite contributions from developers towards the cost of new infrastructure and for meeting social and environmental requirements.
ID6	Consideration should be given to rewording the policy to make clear how SPD's will help to aid infrastructure delivery.

Further details of proposed mitigation measures can be found in the main report.

1.5.3 Compliance with National Planning Policy Framework

It should be noted as well that the Submission Draft Core Strategy is in general accordance with the National Planning Policy Framework (NPPF) as it will deliver at a local level many of the aims and objectives of the NPPF, particularly in relation to the following aspects:

- Building a strong and competitive economy;
- Ensuring the vitality of town centers;
- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design;
- Promoting healthy communities;
- Protecting green belt land (notwithstanding planned local green belt reviews in the plan);
- Meeting the challenge of climate change;
- Conserving and enhancing the natural and historic environments; and
- Facilitating the sustainable use of minerals.

1.6 Next Steps

The Submission Draft Core Strategy will be subject to a period of public consultation (**insert dates**), along with the SA Report. Once consultation responses have been received work will begin on revising the Core Strategy for examination.

We would welcome your views on the SA Report for the Submission Draft Core Strategy. All comments received by the closing date will be considered and the SA will be amended as appropriate.

1.7 How to Comment

We hope you have found the information in this non-technical summary useful. To obtain a full copy of the full Sustainability Appraisal Report, containing the detailed assessment findings, please visit:

- www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework

or email:

- ldf.consultation@bradford.gov.uk

Further information may be obtained from the Planning Policy at Bradford Council on 01274 433679. Comments may also be submitted online at [xxxx](#) during the consultation period. In particular, we would like to hear whether the impacts which are predicted are likely and whether there are any significant effects which have not been considered.