

Local Plan for the Bradford District

Allocations Development Plan Document

Issues and Options

SITE ASSESSMENT METHODOLOGY



This page has been left intentionally blank

CONTENTS

		Page
1.	Introduction	4
2.	National & Local Policy Context	5
3.	The Evidence Base and its Role in The Site Assessment	7
4.	Site Size Threshold	7
5.	Source of Sites	8
6.	Establishing Housing Land Required in Each Settlement	10
7.	General Principles In Establishing the Methodology	11
8.	Overview of the Stages	13
9.	Stage 1:	14
10.	Stage 2:	15
11.	Stage 3:	15
12.	Stage 4:	16
13.	Stage 5:	17
14.	Stage 6:	20
15.	Stage 7:	21
16.	Stage 8:	22
17.	Stage 9:	23
18.	Stage 10:	25
19.	Use Specific Criteria	28
20.	Next Steps & How to comment	27

FIGURES & TABLES

	Page
Figure 1 – Stages of the Site Assessment Process	13
Figure 2 – Sustainability Appraisal Process	24
Table 1 : Application of Dwelling Stock Losses to Settlement Housing requirements	10

1. INTRODUCTION

- 1.1. The Council is preparing a new Local Plan for the district. The plan will shape key decisions such as where new homes, jobs and infrastructure are located and which areas and green spaces are protected. The Local Plan comprises a number of separate documents some of which are now well on the way towards completion and adoption. This includes the strategic part of the Local Plan – the Core Strategy.

The Council are currently conducting consultation and engagement on another of these Local Plan elements – the Allocations Development Plan Document (DPD).

- 1.2. As part of the current consultation exercise a number of background papers have been published on the Council's website. The aim of this paper is to explain how the Council propose to assess and compare potential development sites with particular reference to housing.
- 1.3. The Allocations DPD will allocate sites for a range of uses including housing, employment, and infrastructure and will also allocate sites for gypsies, travellers and travelling showpeople. The majority of the stages and assessment criteria will apply to all uses although it should be noted that Government guidance does in some instances vary slightly according to use. In addition there will be a number of specific factors and criteria which will be applied to employment site selection and these are highlighted in brief in section 19. Likewise the Council will look to develop and add additional criteria to the process to ensure that sites can be identified which meet the specific and cultural needs of travellers.
- 1.4. The Council welcomes comments on this methodology and as with other aspects of the Issues and Options consultation, responses should be submitted so that are received by **5pm on Tuesday 19th July 2016**. Comments can be made in writing or submitted electronically. The Council strongly encourages the use of electronic forms of submission as it makes the processing and response to them quicker and more efficient. Further details on how to comment are included in section 20.

2. NATIONAL AND LOCAL POLICY CONTEXT

- 2.1. In formulating its draft site assessment methodology and identifying individual site assessment criteria, the Council has had full regard to the Government policy as set out in the National Planning Policy Framework (NPPF) and of the local strategic policy context as set out within the Council's Core Strategy. The Core Strategy at the time of writing this paper is subject to an Examination In Public and the Council considers the submitted policies to be sound and compliant with the NPPF.
- 2.2. While the NPPF does not set out a specific approach to site assessment it does provide general guidance on the overall result of any site allocations process and provides specific guidance on a number of topics most notably on green belt, flood risk, protecting the natural and built environment and ensuring that plan proposals are deliverable. It confirms that Local Authorities should plan positively to meet the development needs of its areas and that its Local Plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Plans should represent the most appropriate strategy when considered against the reasonable alternatives [Paragraph 182]. In the context of the Allocations DPD this means that the choices of which sites are allocated must represent the most appropriate ones.
- 2.3. The approach and criteria within this site assessment methodology has been designed to reflect paragraph 110 of the NPPF which states that local planning authorities in preparing plans to meet development needs should allocate land with the least environmental or amenity value. It also seeks to accord with paragraph 111 encourages the use of previously developed (brownfield) land provided that it is not of high environmental value.
- 2.4. However it recognises that a positive approach to plan making also involves seeking opportunities to enhance environmental assets and also involves going beyond an initial identification of potential impacts to assessing how and the extent to which those impacts can be mitigated.
- 2.5. The assessment methodology has also had regard to the more detailed advice set out within the Government's Planning Practice Guidance (PPG). The PPG which provides useful material on a range of subjects including land availability assessments, flood risk assessments and sustainability appraisal which shape both the methodology and the evidence which the Council's produces.
- 2.6. In carrying out its suggested approach to site assessment and in integrating Sustainability Appraisal into each main plan preparation stage, the Council is confident that the requirement of paragraph 152 of the NPPF – that Local Planning Authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and that significant adverse impacts on any of these dimensions should be avoided – will be met.

2.7. With regards to local policy, the Allocations DPD will be required to conform to the strategic policies contained within the Core Strategy. The Core Strategy has set out a number of policies which are particularly relevant to site assessment and site selection. The key ones are considered to be:

- Policy SC5/A which sets out an approach to prioritising sites according to location and greenfield or brownfield status;
- Policy SC5/B which indicates an accessibility orientated approach to comparing sites;
- Policy SC7 which identifies the need for green belt releases to meet the district's development needs;
- Policy SC8 - which sets out the approach to ensuring that the integrity of the South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC) are not adversely effected;
- Policy EC1 which indicates general and geographical priorities for creating a successful district economy;
- Policy EC2 which indicates the scale and distribution of new employment land to be provided;
- Policy TR1 which indicates that development should be located so that the use of sustainable travel is maximised and the impact of development on existing transport networks is minimised;
- Policy HO6 – which indicates that plans should give priority to the development of previously developed land and buildings;
- Policy HO7 which sets out a number of principles which should be followed in determining housing site allocations;
- Policy HO12 – which establishes the need for additional accommodation for gypsies and travellers and travelling showpeople and sets out criteria for new sites;
- Policy EN2 which seeks to avoid adverse impacts on sites designated as importance to biodiversity or geodiversity;
- Policy EN3 which seeks to protect and enhance designated heritage assets and their settings;
- Policy EN4 which relates to conservation, management and enhancement of landscapes;
- Policy EN5 which related to trees and woodlands;
- Policy EN7 which seeks to manage and reduce flood risk and requires the integration of sequential testing into plan making so that site choices where possible avoid areas of higher flood risk;
- Policy EN8 – which relates to environmental protection and to the quality of air, water and land resources;
- Policy EN12 – which indicates the need to avoid the sterilisation of sandstone, coal, and sand and gravel resources.

3. THE EVIDENCE BASE

- 3.1. The Council has already produced a range of evidence which has informed the strategic policy choices within the Core Strategy and many of these studies provide a starting point for the evidence required to underpin the site allocation process. These include the Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Review which have generated the initial list of potential development sites and assessed the deliverability of those sites. The SHLAA has also used the content of the NPPF to assess the suitability of sites.
- 3.2. The Council has issued a background paper which sets out the evidence base in more detail and issued a 'call for evidence'. In the coming months a series of studies will be produced to provide information and assessments in particular relating to flood risk, highways impact and traffic modelling, and public transport accessibility. These studies will enable the Council to assess the impacts both of each site individually and also their cumulative impacts. A green belt review will be carried out, an updated infrastructure plan produced and the emerging Plan's proposals will be subject to a variety of assessments including Sustainability Appraisal, Habitats Regulations Assessment, Health Impact Assessment and Equalities Impact Assessment.

4. SITE SIZE THRESHOLD

- 4.1. The threshold for allocation of sites within the Plan is 0.2ha. In the case of potential housing sites the Council will also consider sites smaller than this where there is a prospect of securing at least 5 units. This represents a significant reduction in the normal site threshold adopted in most Local Plans (0.4ha) and to that adopted in the RUDP. The Council has taken this decision due to the scale of housing need and therefore land required and also to maximise the use of development opportunities within built up areas and to minimise the release of green belt.
- 4.2. Sites which are submitted to the Council that are below this threshold will therefore not be considered for allocation. Such sites may still be considered for development or change of use via the submission of planning applications and any that are approved and implemented would be classed as windfall development.

5. SOURCE OF SITES

- 5.1. The sites which are within the initial list of site options and which are the subject of Issues and Options consultation have been compiled from a number of sources, the majority of which are within the Council's SHLAA and Employment Land Review. These sources include:
- Former development plan allocations
 - Sites with planning permission and extracted from the Council's Employment and Housing Land Registers;
 - Call for sites submissions – the Council have issued previous calls for sites as part of its SHLAA work and received a large number of submissions from land owners, developers and members of the public;
 - Site survey work;
 - Master plans and neighbourhood plans;
 - Council asset review – land or buildings which the Council considers are surplus to requirements.
- 5.2. As part of the Allocations DPD Issues and Options consultation, the Council have issued a further and final call for sites.
- 5.3. In addition to any new sites from this source the Council will be conducting a review of the green belt around all of the 25 settlements within the Plan area for which the Core Strategy sets housing requirements.

6. ESTABLISHING THE NUMBER OF HOUSING AND EMPLOYMENT ALLOCATIONS NEEDED IN EACH SETTLEMENT

- 6.1. Core Strategy Policy HO3 indicates that sufficient land must be allocated to meet the housing requirement of 42,100 new homes over the period 2013-30. It then distributes that requirement among the different settlements and areas.
- 6.2. However the actual amount of housing land needed in each settlement depends on two further factors.
- 6.3. Firstly the Core Strategy confirms that housing completions on sites since April 2013 may count as supply towards that requirement in addition to the allocation of new sites. This means that the supply for each settlement will comprise:
 - a. Completions on fully implemented sites (of 0.2ha or 5 units or above) which commenced since April 2013;
 - b. Partially implemented sites / sites under construction (of 0.2ha or 5 units or above) where sites commenced since April 2013;
 - c. New sites yet to begin development which may be:
 - Sites with planning permission or previously allocated for residential development within the RUDP – in both cases only where SHLAA or other evidence indicates their deliverability or developability;
 - Other sites without any form of planning status subject their appraisal and selection under the methodology outlined in this paper.
- 6.4. Secondly Core Strategy Policy HO1 indicates that the Allocations DPD will need to assess projected losses to the existing housing stock from clearance and change of use and increase the level of allocations to compensate accordingly. It is very difficult to estimate the level of future losses because the development and clearance programmes of housing providers operate on a much smaller time frame than that of the 15 year Local Plan and because those programmes are highly sensitive to changes in government policy and funding.
- 6.5. The Council will therefore follow the established practice followed by most Local Authorities and produce a projection of average annual losses district wide based on past trends but also reality checked against any evidence to suggest that those past rates may in future be higher or lower than that recently realised. It will consult with housing providers in producing this assessment.
- 6.6. Providing data can be geographically differentiated the Council will determine the projected annual losses by Core Strategy sub area and then apportion this additional requirement to settlements based on their Policy HO3 requirement. An example of how this may apply is given below:

Table 1: Application of Losses to Dwelling Stock to Regional City Housing Apportionments

In this theoretical example the Council has determined that based on past trends an average of residential 100 units may be lost each year within the sub area due to demolition or change of use:

	CSPD Req.	% of Regional City Req.	Annual Allowance for dwelling stock losses	Total Additional Units Over Plan period 2013-30	Revised Requirement
Bradford NE	4,400	15.9%	100 x 0.159 = 16	16 x 17 = 272	4,672
Bradford SE	6,000	21.6%	100 x 0.216 = 22	22 x 17 = 374	6,374
Bradford SW	5,500	19.8%	100 x 0.198 = 20	20 x 17 = 340	5,840
Bradford NW	4,500	16.2%	100 x 0.162 = 16	16 x 17 = 272	4,772
Shipley	750	2.7%	100 x 0.027 = 3	3 x 17 = 51	801

6.7. The division of units as indicated in the table will be reality checked against available and deliverable and developable land supply and against environmental impacts and adjusted within the settlement tier if necessary.

6.8. Within each settlement land allocations needed will therefore be:

Policy HO3 Requirement	+	Allowance for dwelling stock losses	-	Qualifying completions post 2013
-------------------------------	----------	--	----------	---

7. GENERAL PRINCIPLES IN FORMULATING THE METHODOLOGY

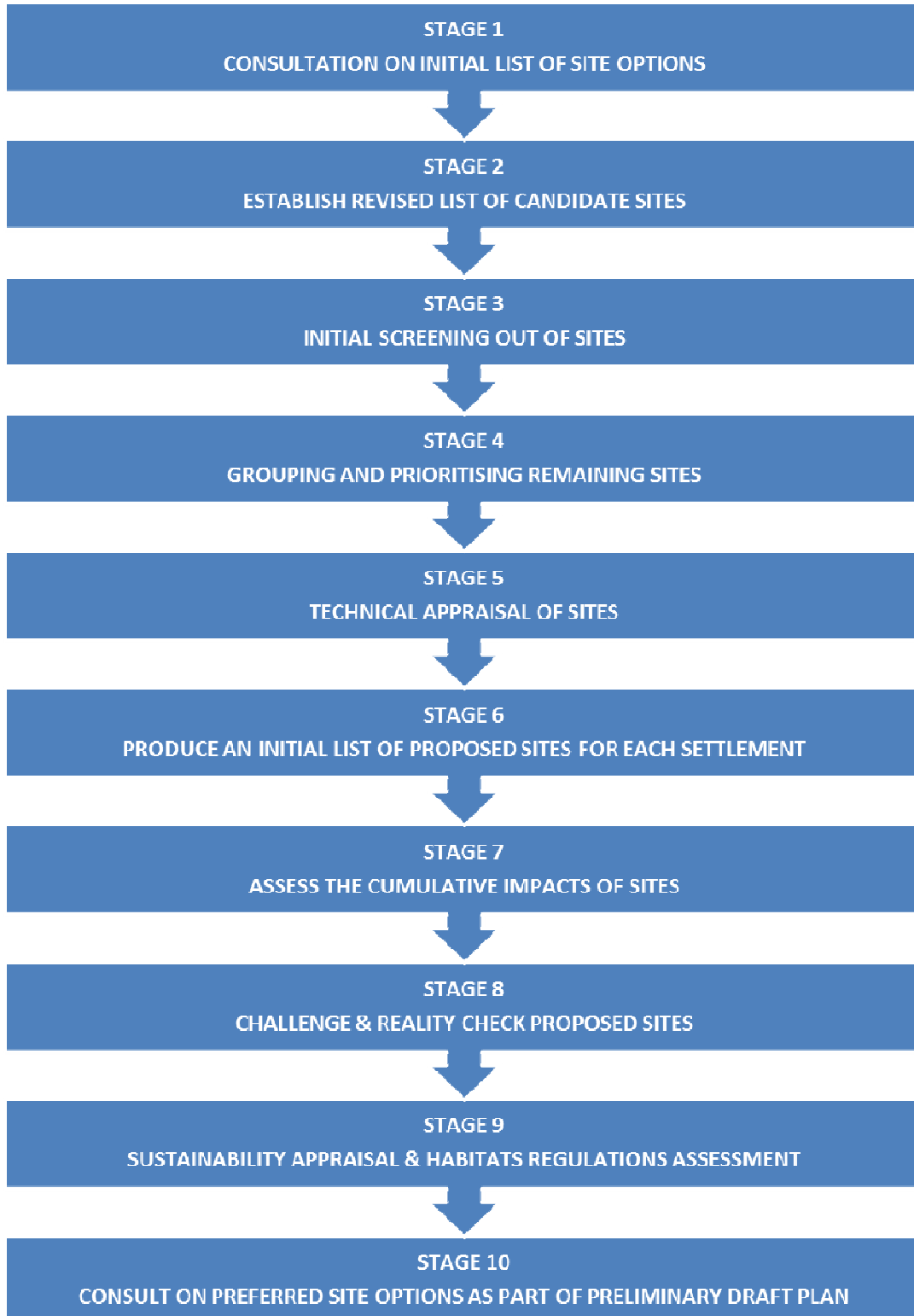
- 7.1. The Council has carried out an appraisal of site assessment methodologies followed by a number of other Local Authorities, in particular those within then Leeds City Region. There is perhaps unsurprisingly a broad degree of similarity in the criteria and information used to assess sites. What differs is if and how those criteria are scored, in what order assessments of different types are applied, and how and on what basis sites are initially screened out of the potential list before more detailed assessments are carried out. Having considered alternative options the Council have derived its approach based on a number of general principles.
- 7.2. Firstly the Council has decided against detailed scoring of sites or adopting an overly scientific or quantitative approach. It does not consider such an approach to be appropriate to what is a complex process involving professional judgements of impacts and benefits. Instead the Council proposes the use of an augmented RAG (Red Amber or Green) rating where impacts are generally described as red where site development would produce significant adverse effects, amber where some impacts are possible or green where no impacts are expected. It then intends to group sites on the same basis into red, amber and green with green sites being those which have clearest justification for allocations and red where development would not be appropriate.
- 7.3. Secondly the Council will adopt a methodology which places considerable emphasis on the examining the potential for impacts to be mitigated. Mitigation can either reduce to acceptable levels any impacts or remove them entirely. Mitigation can be achieved in a number of ways depending on the impact type, for example by providing new or enhanced spaces or habitats where existing areas are impacted or by using design and landscaping to mitigate visual impact or manage or reduce flood risk. In recognition of the role of mitigation and good scheme design, the Council will augment the standard RAG rating system by adopting an Amber 1 and Amber 2 approach. Amber 1 will apply to sites where any potential impacts can be significantly or completely mitigated. Amber 2 will apply to sites where mitigation will only partly address expected impacts.
- 7.4. Thirdly the Council will, as almost all other Local Authorities have done, screen out some sites at an early stage where there is little chance of sites being considered suitable or achievable. This is explained in more detail in the section below dealing with stage 3 of the site assessment process. The screening out of sites will both ensure compliance with Government policy where that policy is unequivocal that development would not be appropriate (for example where sites would adversely affect sites of international or national wildlife importance or within the functional flood plain - zone 3b). It will also ensure the most efficient use of resources required to carry out the extensive testing necessary at latter stages of the process.
- 7.5. Fourthly it is important that the site assessment process tests the impacts and suitability of sites on both an individual basis and a cumulative basis. This means initial testing will look at individual site impacts but that once an initial package of potential sites has been selected for each settlement a series of cumulative

impact tests will be carried out. These tests will relate to highways capacity and impacts, flood risk, and impacts on the South Pennines SPA and SAC. The results will help determine the necessary mitigation measures required, and the infrastructure required to support development but will also allow for adjustment to site selections if impacts cannot be addressed or alternative site package combinations would result in fewer cumulative impacts.

- 7.6. Fifthly and finally the Council will meet its duty to co-operate obligations by working constructively throughout the process by sharing evidence, discussing potential impacts, agreeing methodologies and principles and maintaining dialogue with its neighbouring Local Authorities, and key government agencies.

8. OVERVIEW OF THE KEY STAGES OF SITE ASSESSMENT

8.1. The ten key stages which will be followed in reaching preferred options are set out in Figure 1 below.



8.2. Note some tasks will be carried out in parallel such as green belt review. Also sustainability appraisal scoping will be carried out at the start of the process to ensure that the stages set out in figure 1 encompass the correct tests and provide sufficient robust information to allow the SA to make an informed and robust assessment. Work to provide information to underpin the Habitats Regulations Assessment, although culminating in a published report at stage 10, will also be carried out throughout and across the stages as necessary.

9. STAGE 1 - CONSULTATION ON INITIAL LIST OF SITE OPTIONS

Explanation

- 9.1. The starting point for the site selection process is to ensure that the Council has as wide and as complete a portfolio of site options as possible so that all reasonable site options have been identified and assessed.
- 9.2. The Issues and Options stage consultation will include a Call for Sites to establish whether there are any such further site options. The consultation will involve the publication of the Council's current candidate list which includes sites from the Council's SHLAA and Employment Land Register.
- 9.3. Within the SHLAA some sites have already been categorised red based on whether development on those sites is considered achievable. The achievability assessment is based on a number of criteria – those which may result in a red categorisation include:
- Where sites fall within a number of designations where national policy would normally rule out development such as the S Pennines SPA, Sites of Special Scientific Interest (SSSI's), and sites within flood risk zone 3b. A full list of the designations can be found within the Council's SHLAA report which is available online;
 - Sites which are unavailable due to land ownership constraints or;
 - Sites where there are very substantial physical or viability issues which may development unlikely.
- 9.4. The Council have included all such red 'unachievable' SHLAA sites in the initial Issues and Options consultation. This is for two reasons. Firstly to aid transparency, and to ensure that the reasons for the SHLAA based conclusions are tested and consulted on. Secondly because individual site circumstances can change, particularly with regard to land owner intentions.

Evidence Required At This Stage	The data for this stage has already been gathered in other source documents including the SHLAA and Employment Land Review.
---------------------------------	---

10. STAGE 2 – ESTABLISH REVISED LIST OF CANDIDATE SITES

Explanation

- 10.1. The revised list of candidate sites will comprise the initial list published at Issues and Options stage together with any new sites from:
- Issues and Options Call For Sites – new sites submitted by land owners, developers or other stakeholders;
 - Any additional sites resulting from an internal review of Council land and property assets;
 - Any sites arising from the Council's green belt review.

Evidence Required At This Stage	The Council will use the submissions made during Issues and Options Call for Sites and any new sites arising from a Council asset review and a green belt review.
---------------------------------	---

11. STAGE 3 – INITIAL SCREENING OUT OF SITES

Explanation

- 11.1. The Council are required to assess and compare all reasonable alternative options. This stage therefore involves screening out any sites which are not realistic options either because of conflicts with national policy where that policy would automatically and unequivocally rule out development or screening out sites which are assessed as unachievable for other reasons such as land availability.
- 11.2. Following the conclusion of the Issues and Options consultation the Council will review consultation responses to assess whether there are any reasons to amend the categorisation of any sites which had a red SHLAA rating i.e. new evidence which indicates the sites should be re-categorised as 'potential developable'.
- 11.3. Sites where there is no new evidence to suggest previously assumed land ownership constraints, or previously assumed physical or developability constraints can be overcome will be removed from the list of candidate sites.
- 11.4. Sites which were previously classified within the SHLAA as red due to conflicts with national planning policy and designations which would normally rule out development will be removed for the candidate list unless there is evidence to suggest the previous SHLAA assumptions were incorrect. In such cases the Council will consider the points raised and may consult with relevant agencies before making a final decision on whether to carry those sites forward or the next stage or remove them from the candidate list.

- 11.5. New sites from the sources listed in the previous section will be subjected to the normal SHLAA tests of suitability, availability and achievability. Initial SHLAA assessments of these new sites including projected site yields will be forwarded to the SHLAA working group for comment.
- 11.6. Should any sites have been submitted for other i.e. non-residential uses during Issues and Options consultation they will also be subject to the SHLAA tests but will also be assessed for their suitability for the proposed use. In the case of any site suggested for employment use the Council will apply criteria used within its last Employment Land Review.
- 11.7. Any sites which are screened out and removed from the table of candidate sites will be added to a rejected sites table and a background paper which will be eventually published and consulted upon alongside an accepted sites table and background paper.

Evidence Required At This Stage	Sites in the initial list will be re-appraised taking account of any information submitted by those promoting them. New sites will be assessed for their suitability, availability and achievability. This will involve site surveys, desk based GIS assessments, yield calculations and consultation with the SHLAA working group.
---------------------------------	---

12. STAGE 4 – GROUPING AND PRIORITISING REMAINING SITES

Explanation

- 12.1. At this stage a series of tables will be produced for each settlement / area which indicate how the site performs against 4 criteria:
- Prioritisation based on location and PDL status;
 - Regeneration priority – whether the site is in a regeneration priority area, whether it has the potential to regenerate an area by reclaiming derelict land
 - Public transport accessibility scoring
 - Which flood risk zone the site is within
- 12.2. Based on Core Strategy Policy SC5 sites will be grouped as follows:
1. First priority to the re-use of deliverable and developable previously developed land and buildings within settlements;
 2. Second priority to mixed green field / brown field sites within settlements
 3. Third priority to green field sites within settlements;
 4. Fourth priority to local green belt releases to the built up areas of settlements
 5. Fifth priority to larger urban extensions

Note : Sites where more than 75% of the sites is green field or brownfield will be placed in that category rather than in the mixed category

- 12.3. The exception to this approach is for the urban extension at Holme Wood which has already been established as a strategic priority and a location for major growth. This will be categorised as a first priority site.
- 12.4. With regards to regeneration sites will be assigned:
- category one status if within a Council regeneration priority area,
 - category 2 status if the site would secure the reclamation or improvement of a derelict, contaminated or unsightly site;
 - category 3 status if neither of the above apply.
- 12.5. With regard to accessibility sites will be assessed and grouped according to how accessible they are to a main employment centre, health and education facilities, and leisure and retail facilities. Assessments will be developed in consultation with the West Yorkshire Combined Authority, with Appendix 3 of the Core Strategy as the starting point. Consideration will be taken in the final site selection of not only current accessibility but of the opportunities for mitigation and of opportunities for investment which would secure improved accessibility for example via new or re-routed public transport.
- 12.6. Sites will also be grouped according to the flood risk zone in which they lie with priority given to flood zone 1 sites. Note that further more detailed flood risk assessments and an overall sequential testing paper will be produced at later stages.

Evidence Required At This Stage	The assessment is based on Core Strategy policy, and land status derived from survey work and uses GIS and map based analysis. It will also draw on the results of an updated Settlement Study, the current version of which has informed the Core Strategy.
---------------------------------	--

13. STAGE 5 – TECHNICAL APPRAISAL OF SITES

Explanation

- 13.1. This stage will include the gathering of information and the carrying out of consultation with specialist services within the Council and with key external consultees.
- 13.2. The aim will be to assess each site against a range of issues and criteria designed to identify potential impacts and identify mitigation measures. Mitigation measures may then feed into policy requirements within the DPD or even additional land use allocations (for example for new open space, highways improvements, new schools provision etc).

13.3. Sites will be given a RAG rating (Red, Amber, Green) against each of these criteria.

Green	Where no impacts are expected.
Amber 1	Where there is potential for impacts but those impacts are capable of being completely or substantially reduced or mitigated.
Amber 2	Where there is potential for impacts but those impacts can only partially mitigated.
Red	Where significant and unacceptable adverse impacts are will render development of the site innapropriate.

13.4. The assessments to be carried out at this stage will be:

- Highways – to determine whether the site can be satisfactorily and safely accessed and whether the site’s development would cause any unacceptable impacts on the local highway network. Potential required highway improvements will be identified.
- Drainage and flood risk – to assess whether the site lies within an area susceptible to flood risk or would cause flood risk issues. Potential management and mitigation requirement will be identified. Assessment will be based on internal officer assessments and consultation with the Environment Agency and Yorkshire Water.
- Heritage Impacts – to determine whether the candidate site would adversely affect built heritage including the Saltaire World Heritage Site and its setting, conservations areas and listed buildings and their settings, historic battlefields and areas of archaeological interest. The potential for design, layout, and landscaping to mitigate any potential impacts will be explored. Assessment will be based on internal officer assessments and consultation with Historic England.
- Wildlife and Ecological Impacts – to determine whether candidate sites would adversely any regionally or locally designated sites or any undesignated habitats. This will involve internal officer assessment and consultations with West Yorkshire Ecology and Natural England. Note impacts on the South Pennines SAC and SPA would also be assessed but as part of the habitats Regulations Assessment process.
- Trees and woodlands – an assessment of any potential impact on designated (TPO’s) or undesignated trees and the identification of any mitigation measures which should be incorporated into scheme design.
- Landscape Impacts – this will include an internal officer assessment of the capacity and sensitivity of the landscape and highlight the level of impacts a site’s development may produce and the scope for mitigation. The assessment

will utilise as a starting point the contents for the Council's Landscape Character SPD but will also take full account of the potential for design, layout and landscaping to mitigate impacts.

- Open Space and green infrastructure – an assessment of whether the candidate site would lead to the loss of any existing space (both formal such as playing pitches, and informal). An assessment of the significance of any loss in the context of local open space availability, local standards, and the potential to create alternative replacements spaces and facilities will also be made. Any impacts on areas which serve a wider role as green infrastructure will also be considered. In each case, assessment will establish whether development would offer opportunities to create new or enhanced green spaces or green infrastructure.
- Environmental Protection – an assessment of any impacts with regard to air quality, and water quality and assessment of any issues with regards to land stability. This will include if necessary consultation with the Coal Authority where there site may lie within an area of previous mining activity.
- Utilities assessment – consultation will be carried out with the main utility providers to assess matters such as sewage treatment capacity, and gas and electricity infrastructure. Results will also be fed into an updated version of the Local Infrastructure Plan.

13.5 This stage will also involve making a preliminary assessment of the most appropriate use of the site. For example criteria relevant to the suitability and deliverability of employment sites will be defined and applied to each site as will criteria developed in conjunction with the community for gypsy and traveller sites and sites for travelling showpeople.

Evidence Required At This Stage	The Council will consult with specialist teams within the Local Authority including drainage, highways development control conservation, and will work with key external bodies.
---------------------------------	--

14. STAGE 6 – PRODUCE AN INITIAL LIST OF 15. PROPOSED SITES FOR EACH SETTLEMENT

Explanation

- 14.1 This will bring all the information and assessments of previous stages together. For each settlement a list of proposed sites will be put together which would provide the required quantum of plots for housing, employment or other uses. plots. This stage will therefore also include the assessment of what use or mix of uses would be most appropriate for each site.
- 14.2 The number of housing sites required will depend on the yields which have been assumed for those sites. The SHLAA will have provided a starting point for assessing the expected yield of each site. However these may need to be adjusted either upwards or downwards in the light of the detailed impact testing and assessment carried out in previous stages. Account will also need to be taken of Core Strategy Policy HO5 which requires that all sites deliver the most houses possible and also of whether a decision has been made to define any locally specific density targets.
- 14.3 Sites will be assigned an overall RAG rating based on the prioritisation at stage 4 and the technical assessments at stage 5. Sites within higher priority groups with few or no adverse impacts will be assigned a Green RAG rating and those with significant and unacceptable adverse impacts against one of more of the stage 5 criteria will be assigned a red RAG rating. The rating of all other sites will depend on the balance of impacts and issues in each case.
- 14.5 This will mean that some sites which are placed within higher prioritisation groups will be overlooked in the initial list of allocations in favour of lower priority sites if their technical assessments indicate that development would cause adverse impacts.
- 14.6 The number of lower priority sites identified for allocation and number of sites with some impacts will depend on the scale of land required in the settlement and the number of deliverable or developable alternatives. Poorer performing sites may be chosen in settlements with a high housing requirement but limited land availability, whereas in settlements with a low requirement and high availability relatively sustainable sites might be omitted from the initial list of allocations.

Evidence Required At This Stage	This stage will be bringing together information and assessment produced at previous stages, and updated yield assessments.
---------------------------------	---

15 STAGE 7 – ASSESS THE CUMULATIVE IMPACT OF SITES

Explanation

- 15.1 The previous stages will have resulted in a preliminary list of potential development sites allocations based broadly as looking at the impacts of each site individually. This stage will assess:
- Whether the in cumulative or in combination effects of the proposed sites raise significant issues not apparent within individual site appraisals;
 - What the nature of those additional impacts are;
 - Whether an alternative package of sites might be capable of reducing or removing those impacts;
 - What mitigation or management measures might be required and in particular what infrastructure improvements might be required.
- 15.1 The cumulative assessments may therefore require land to be allocated or reserved for new infrastructure or specific design, infrastructure or mitigation requirements to be written into site policies.
- 15.2 The cumulative impact assessments will focus on:
- The Local and strategic highway network informed by updated transport modelling and key corridor based studies;
 - Flood risk informed by a Level 2 Strategic Flood Risk Assessment;
 - Education capacity and other service requirement;
 - Wildlife impacts in particular relating to the South Pennines SPA / SAC
- 15.3 This stage will also be a key stage for revising and adding to the Local Infrastructure Plan. As a result of the cumulative impact assessments the proposed list of site allocations in each settlement may be amended or may be retained unaltered.

Evidence Required At This Stage	<p>Highways - The Council will be commissioning an update to its transport model and will then use that model to develop key corridor based studies to assess the cumulative impacts of site proposals, identify potential problems and identify infrastructure improvements required to support development.</p> <p>Flood risk – the Council will compete an update to its Level 1 Strategic Flood Risk Assessment in co-operation with the Environment Agency and will commission a Strategic Flood Risk Assessment level 2 to focus in on sites and areas which have greatest potential to be subject to flooding. This will integrate in analysis of all sources of flooding including surface water.</p> <p>Education - the Council's Planning Service will continue to work with the Council's Education Planning teams to assess current capacity issues and the impacts of initial proposed site packages on future capacity with a view to identifying requirements for new sites.</p> <p>The Council will commission a Habitats Regulations Assessment. This will be informed by further work, evidence and the requirements set out under Core Strategy Policy SC8.</p>
---------------------------------	---

16 STAGE 8 - CHALLENGE AND REALITY CHECK PROPOSED SITES

Explanation

16.1 Once the site allocation lists for each settlement have been subject to any adjustment necessary as a result of cumulative impact testing, the results will be subject to further challenge.

16.2 For each settlement the following questions will be posed:

- Have sufficient deliverable and developable sites been identified to meet the development targets set out within the Core Strategy?
- Is there an alternative otherwise acceptable choice or configuration of sites for that settlement which would secure greater benefits with regards to infrastructure investment and delivery within the settlement or the wider sub area?
 - Does the flood risk sequential test suggest that there are alternative sites choices for that settlement in areas of lower flood risk and if so is there any reason why these alternatives should not be pursued?
 - Is there an alternative selection of deliverable and developable sites for that settlement which would deliver a higher proportion of development on previous developed land. If there is such an alternative, is there a reason why it would not be appropriate to adopt this alternative?
 - Is there an alternative selection of sites for that settlement which would offer more environmental improvements as set out within Core Strategy Policy HO7?
 - Is there an alternative selection of sites for that settlement which would have fewer adverse environmental impacts as set out within Core Strategy Policy HO7;

16.3 As can be seen above if any of the questions are answered in the negative, the Council will still assess whether changes are justified or whether the site selection should be maintained for other reasons.

16.4 This stage of the process will also involve the production of a Local Plan Viability Assessment.

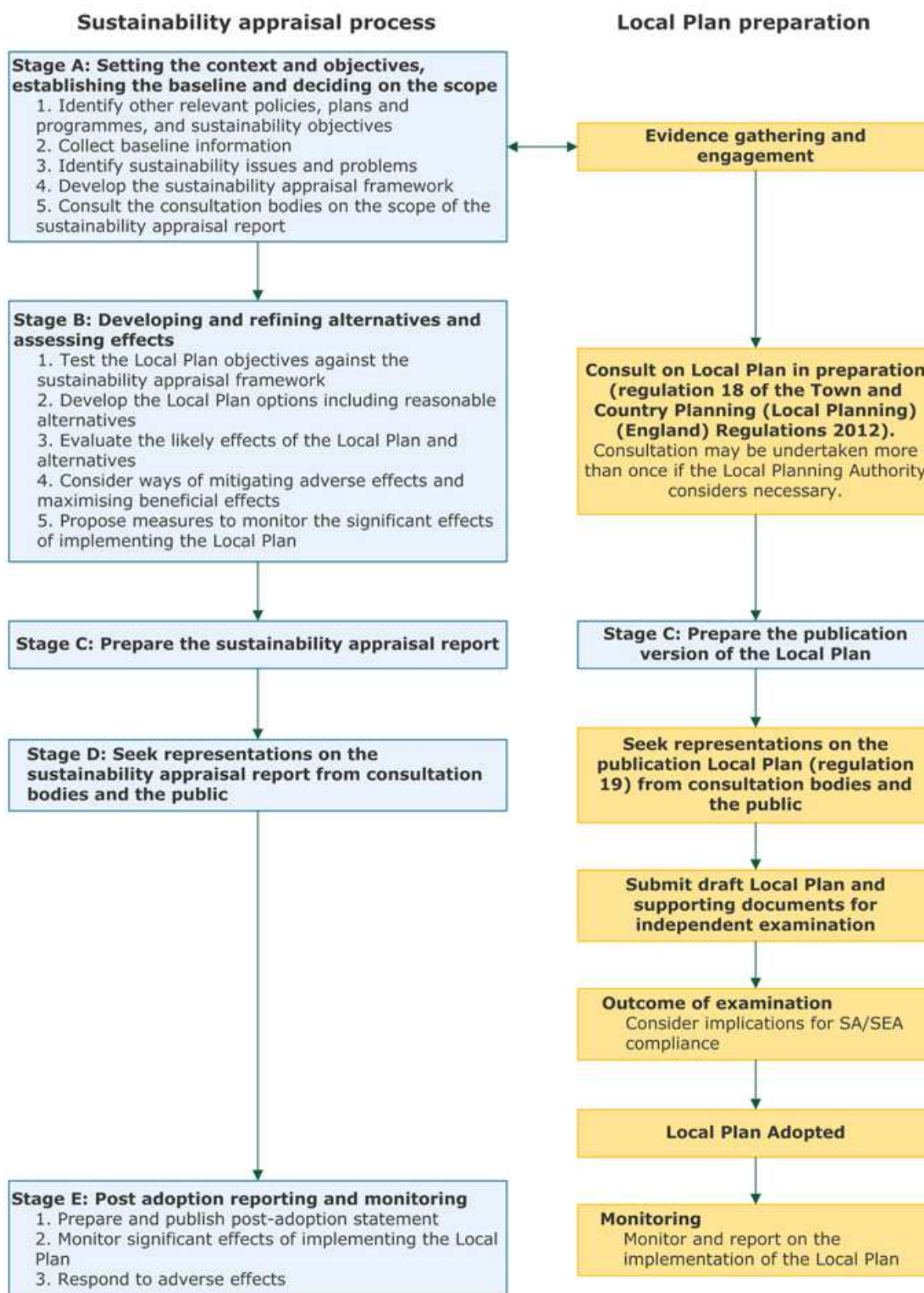
Evidence Required At This Stage	<ul style="list-style-type: none"> • Viability testing
---------------------------------	---

17 STAGE 9 - SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS ASSESSMENT

Explanation

- 17.1 In line with section 19 of the Planning & Compulsory Act the Council's site selections within its Local Plan will be informed by the results of a sustainability appraisal. Although sustainability appraisal is listed as stage 9 in reality the sustainability appraisal process will start much earlier and affect the plan's content in an iterative fashion throughout the stages of its preparation. However this will be a key stage as it will see the completion and publication of a full SA report. Earlier SA work will have included scoping and use of the SA to ensure that the right criteria and impact tests have been carried out with particular reference to stage 5.
- 17.2 The Government's Planning Practice Guidance describes a sustainability appraisal as a systematic process that must be carried out during the preparation of a **Local Plan**. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. The key stages of the SA process are set out in a diagram within the PPG which will be followed by the Council and which is reproduced below:
- 17.3 As further integral part of preparing the Allocations DPD is undertaking a Habitats Regulations Assessment to ensure that the Plan does not lead to adverse effects on the ecological integrity of internationally important habitats or species assemblages within or close to the district.
- 17.4 Habitats Regulations Assessment (HRA) is a requirement of the Conservation of Habitats and Species Regulations 2010 (as amended; commonly referred to as 'the Habitats Regulations'), and must be applied to any plan or project in England and Wales with the potential to adversely affect the ecological integrity of any sites designated for their nature conservation importance as part of a system known collectively as the Natura 2000 network of European sites. The relevant area in this case is the South Pennines Special Protection Area (SPA) and South Pennines Special Area of Conservation.

Figure 2 : The Sustainability Appraisal Process



18 STAGE 10 – PUBLISH PREFERRED SITE OPTIONS AS PART OF CONSULTATION ON A PRELIMINARY DRAFT PLAN

- 18.1 This is the culmination of the site assessment process where the Council has produced a preliminary draft plan which will include not only the proposed suite of development sites but also a range of policies and other designations designed to protect environmental assets.
- 18.2 At this stage the Council will also ensure that the evidence which has underpinned the work is published. Lists of both and details of both development sites which have been accepted for allocation and those rejected will also be published.

19 USE SPECIFIC CRITERIA

Employment

- 19.1 The Allocations DPD is tasked with identifying and allocating at least 135ha of employment land within the district and in accordance with Core Strategy Policy EC3 these allocations will be apportioned as follows:
- 100ha within the City of Bradford
 - 30ha within the Airedale Corridor
 - 5ha within the Wharfedale corridor
- 19.2 All candidate development sites will be assessed for the suitability as employment allocations and be assessed in line with the stages above. However employment sites require more specific locational attributes and must be in places accessible to the strategic highway network and attractive to modern end users. The Council will therefore develop some further employment specific criteria to ensure that attractive and deliverable sites are identified. Some of the potential criteria to be used are listed below based on the guidance within the Core Strategy and also the approach top assessment taken within the Council's Employment Land Review:

SPECIFIC EMPLOYMENT SITE ASSESSMENT CRITERIA

- Location – Bradford South, Motorway corridor, Airedale corridor
- Size - Strategic sites above 5 hectares
- Topography - Flat sites preferable
- Access - Proximity to main distributor routes, Classes A, B,
- Access to transportation Links
- Market Significance - Local, Regional National markets
- Marketability – ability to attract tenants
- Infrastructure - Access to Superfast Broadband; Access to Utility supply

- Proximity to other existing employment clusters
- Local road network congestion levels
- Local facilities available
- Surrounding Environment

Gypsies and travellers and travelling showpeople

19.3 The Council will consult with Traveller and Showpersons groups to identify areas of search for new sites and identify specific criteria to ensure that sites are located where they will meet the community's needs and support their lifestyles and wellbeing.

20 NEXT STEPS & HOW TO COMMENT

- Further information relating to the Allocations DPD can be found on the Council's website at the address below:
- Comments on the proposed site assessment methodology for the Allocations DPD must be made in writing and received by the Council by 17.00 hours Tuesday 19th July 2016
- Comments can also be made on the Council's initial list of candidate sites using the interactive map which can be found online or by completing a Consultation Comment Form or in writing.
- **The Council strongly encourages the use of electronic and online methods of submission as it makes the processing and response to them quicker and more efficient.**
- Comments should be sent to the following address or e-mail:

Land Allocations Team
2nd Floor South
Jacobs Well
Manchester Road
Bradford
BD1 5RW

Planning.policy@bradford.gov.uk

