

Local Development Framework for Bradford

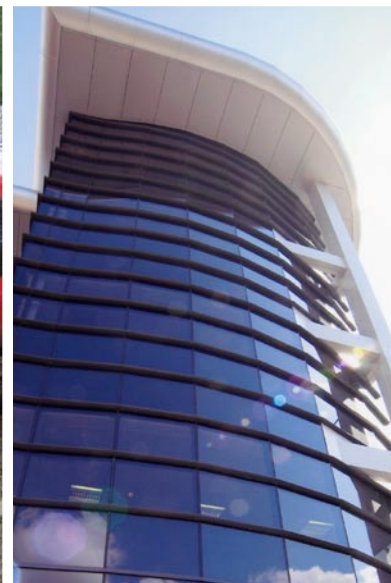
Core Strategy

Issues and Options

Summary of Representations

Topic Paper 7: Environment

December 2007



City of Bradford MDC

www.bradford.gov.uk

LIST OF CONSULTEES WHO SUBMITTED COMMENTS ON TOPIC PAPER 7:

1. J. Addie
2. Airedale Partnership
3. Ben Rhydding Action Group
4. Bradford Centre Regeneration
5. Bradford Ornithological Group
6. Bradford University
7. British Wind and Energy Association
8. Environment Agency
9. English Heritage
10. Environmental Partnerships
11. Future Energy Yorkshire
12. Government Office for Yorkshire & Humber
13. Home Builders Federation
14. Ilkley Civic Society
15. Ilkley Parish Council
16. Metro
17. Natural England
18. Royal Society for the Protection of Birds
19. The Ramblers Association
20. Sport England
21. United Co-Operatives Ltd
22. West Yorkshire Archaeology Advisory Service
23. West Yorkshire Ecology
24. Yorkshire Forward
25. Yorkshire and Humber Assembly
26. Yorkshire Water

COMMENT	ORGANISATION
<p>GENERAL</p> <p>We are disappointed that in this section where it describes the district as being 2/3 open country, with the majority being green belt it also states that most farmland can be described as marginal. The council should recognise that there are areas of the district, which contain the highest quality agricultural land. Every effort must be taken to preserve this land as it is likely to be a vital resource for the future.</p>	<p>Ben Rhydding Action Group</p>
<p>Wind energy currently supplies approximately a million homes in the UK. It is important to support and encourage the growth of the sector and associated benefits.</p> <p>BWEA welcomes the preparation of the LDF, and emphasises the importance of including a renewable energy policy that follows the guidance of Planning Policy Statement 22 and the forthcoming Climate Change PPS, which forms an Annex to PPS1.</p> <p>The Annex to PPS1 states that LPAs should look favourably on proposals for renewable energy. It also states that LPAs should not require applicants to demonstrate the overall need for renewable energy in certain locations and that they should avoid policies that set stringent requirements for minimising impact on landscape and townscape if these effectively preclude the supply of certain types of renewable energy.</p> <p>BWEA strongly recommends that the Council introduce specific policies designed to deliver greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change.</p> <p>BWEA strongly recommend that the Council avoid using generic phrases which simply seek to encourage the use of energy efficiency, renewable energy and the minimisation and management of waste and pollution, for example, as such phrases lack the detail and commitment necessary to ensure that such aspirations are achieved. BWEA therefore strongly</p>	<p>British Wind and Energy Association</p>

<p>recommend the inclusion of an overarching climate change policy within the Core Strategy document, addressing the above issues, and the inclusion of discrete, proactive policies on energy efficiency, renewable energy, renewable energy, sustainable design and construction, within the Development Control DPD, in order to provide detailed policy direction on each issue and to ensure that such environmental measures are delivered.</p>	
<p>Under the sub-heading influences, it refers to surveys undertaken under LBAP. As Bradford MDC failed to finance the structure of LBAP sufficiently, consultations with local groups came to a halt prematurely. This reduced input from the nature groups. The influence of LBAP therefore could have been greater than it is.</p>	<p>Bradford Ornithological Group</p>
<p>Section 3.30 – We would support policies in conformity with the RSS that deal with the safeguarding of water resources and the encouragement of water efficiency, provided their wording is appropriate. We would expect, as part of your spatial strategy and allocating of sites, that developments should be discouraged in areas where sewerage infrastructure or water supply is either unavailable or at capacity.</p> <p>Section 3.31 – We disagree with the phrase ‘It sets out a Sequential Test that aims to match the type of development to the degree of flood risk’. This is incorrect and would more accurately describe the Exception Test. The Sequential Test aims to avoid <u>all</u> development in areas of flood risk by exploring all reasonably available sites at lower risk from flooding. If the Sequential Test shows there are no alternative sites, consideration should then be given to the vulnerability type of development and the flood risk. The Exception Test may also be needed to be applied, dependent again on the vulnerability type and the flood risk. In taking forward Preferred Options, PPS25 must be taken into full account.</p> <p>Section 3.32 – It is important that a Strategic Flood Risk Assessment (SFRA) is used in an integrated way in the formulation of your LDF (please refer to general comment (a)). It is also important that it is PPS25 compliant and is kept up to date. It will form an essential part of the</p>	<p>Environment Agency</p>

<p>evidence base for your LDF documents, and will therefore have a bearing on the 'soundness' of the documents.</p>	
<p>Climate change is a key priority for the Environment Partnership. The IPCC believe that in order to be able to manage and adapt to the expected climate changes, urgent actions are needed to reduce carbon emissions both now and over the next ten years. The Partnership launched a campaign to work towards being an Eco-City in March 2007. The aim of the campaign is to mobilise action and</p> <ul style="list-style-type: none"> • Collect information • Monitor the performance of organisations and the district • Promote good practice. <p>The Partnership supports inclusion of targets within the LDF to ensure that a percentage of new developments have low and zero-carbon emissions. The Partnership sees the LDF as having a vital role in encouraging the use of renewal energy resources, reducing the impact of road traffic, improving water management and minimising land, air and water pollution. An affective approach would be to include an escalator for on-site energy production of 10% by 2010, 15% by 2015 and 20% by 2020.</p>	<p>Environment Partnerships</p>
<p>Para 3.11 & Options – Please note that PPS3 paras 16 and 46 are relevant (as well as PPS1 & PPG17).</p> <p>Para 3.13 & Options – Strategic conservation and design policy should be specific to Bradford district and particular areas within it. Will need to consider access for all and crime reduction issues.</p> <p>Para 3.25 & Options – The positive approach to renewable, as set out in PPS22, should be followed.</p>	<p>Government Office for Yorkshire and Humber</p>

<p>Para 3.27 – Have AQMAs been declared: LTP refers to four to be declared in 2006?</p> <p>Para 3.33 & Options - The Council should consider taking the lead on sustainable design; policy should be strategic and high level and distinctive to the district. It should also be fully justified and supported by evidence. See also comment on Topic Paper 5, para 3.18 & 3.22.</p> <p>Para 3.34 & Options – The Council will need to consider the most appropriate balance with regard to the options in the light of PPS25.</p> <p>Paras 3.35 – 3.50 - Need updating to reflect the publication in November 2006 MPS1; <u>including Annexes</u> & accompanying Practice Guide (replace MPG1 & MPG6).</p> <p>Will need to take these into account along with relevant extant MPGs. As work on the DPD proceeds, spatial options for the safeguarding of resources (and transport infrastructure/processing/handling plant if relevant) and supply of minerals, including a commitment along with other West Yorkshire authorities to contributing to a West Yorkshire landbank for aggregates should be put forward. Restoration, reclamation and environmental protection should also be addressed. The spatial strategy for minerals can be then derived from the options considered. This should include a high-level policy framework <u>specific to the district</u> for the safeguarding, conservation (including use of secondary materials) and supply of minerals and the other matters referred to. If it is not possible to comply fully with national policy because of the particular resource circumstances of the district (e.g. limited scope for options for aggregates supply), this must be robustly justified with evidence (including SA/SEA) (e.g. the fact that resources are not being worked would not necessarily justify not safeguarding them).</p>	
<p>Need to highlight the importance of locating development in sustainable locations and thus ensure this is a common theme throughout the document.</p>	<p>Metro</p>

<p>The Environment paper is considered by Natural England to present a generally sound base from which an environmentally sustainable suite of policies can be developed.</p>	<p>Natural England</p>
<p>Our preference would be to substitute the term 'historic environment' for that of 'built heritage' (e.g. in para 2.3) except in cases where historic buildings, conservation areas or built form is specifically meant to the exclusion of other parts of the historic environment. In our experience, most lay people do not associate below ground archaeological remains or, for instance palaeo-environmental evidence which is not anthropogenic in origin but contains evidence for past human activity in the form of pollen evidence-when the term 'built heritage' is used.</p>	<p>West Yorkshire Archaeology Advisory Service</p>
<p>I would start by encouraging the section to be re-titled "Biodiversity and Geological Conservation" which links better to PPS9 and allows for the inclusion of references to geology and geomorphology. These disciplines should not be over-looked, both in considering the conservation of designated sites, Sites of Special Scientific Interest (SSSI) and Regionally Important Geological and Geomorphological Sites (RIGS), and in the context of enhancement, by retaining new significant exposures in quarries, road cuttings and other engineering operations. Such sites can be important landscape, education and/or scientific features. They also provide valuable habitat niches for plants and animals.</p> <p>The link which is made between quality of life and biodiversity in your document is welcomed, as is the recognition of the recent change in emphasis within PPS9 to include enhancement and creation, as well as the more traditional conservation, of important habitats.</p> <p>Your document does not draw out the other subtle changes in S40 and 41 of the Natural Environment and Rural Communities Act 2006 regarding the explicit duty on Local Authorities and Parish Councils to have regard to biological conservation. This is a critical consideration when considering the 'Options' set out under Key Question 7.1.</p> <p>These duties extend to all UK Biodiversity Action Plan 'priority habitats and species' which occur</p>	<p>West Yorkshire Ecology</p>

<p>in Bradford, not just the more restricted list in the Bradford Local BAP. It is important to make this distinction when it comes to planning decisions where any UK priority habitat or species can be a material consideration (ODPM Circular 06/2005 para. 84).</p>	
<p>The Assembly welcomes the references to draft RSS Policy ENV5 and to the potential energy targets for 2010 and 2021; identified as 80 MW and 270 MW, which were taken from the Sub Regional Renewable Energy Assessment and Targets Study (2004). However, it would be helpful to make reference to Bradford's indicative renewable energy target of 10.7 MW in draft RSS.</p>	<p>Yorkshire and Humber Assembly</p>
<p>BIODIVERSITY AND LANDSCAPE</p>	
<p>Q 7.1 'WHILE THE OVERALL AIM MUST BE TO PROTECT THE BIODIVERSITY RESOURCE, WHERE SHOULD LOCAL POLICY SUPPORT AND RESOURCES FOR ENHANCEMENT BE FOCUSED?'</p>	
<p>The Airedale Masterplan has the 'rural backdrop' at its heart. The LDF needs to ensure that the distinctive landscape of Airedale is protected and developed in a sensitive way particularly in keeping the green and wildlife corridors between the urban centres and villages it is what attracts people and businesses to the area.</p> <p>Policy should support the protection and development of local key sites, SSSI's, SEGI's, moorland, floodplain and woodland and other specific sites in the Local Biodiversity Action Plan. Where development takes place there is a link between the site plans and the surrounding public realm improvements through the Council working with the developers to avoid good quality developments being surrounded by poor public realm or vice versa</p>	<p>Airedale Partnerships</p>
<p>We would strongly support proposals for floodplain habitat creation and enhancement. By setting aside land for such uses in the floodplain, there a significant sustainability benefits to be had: -</p> <ul style="list-style-type: none"> • Ecological benefits through habitat creation and enhancement; • Ecological benefits through creation and enhancement of wildlife corridors; 	<p>Environment Agency</p>

<ul style="list-style-type: none"> • Recreational benefits through the creation of riverside paths, recreation areas or fisheries opportunities; • Minimise sensitive receptors to flooding i.e. built development; <p>Opportunities should be taken for wetland creation that reduces the risk of flooding in the catchment as well as providing amenity, wildlife and recreational opportunities. Please refer to the Aire CFMP (attached) for further information on the current strategy in your area (please also refer to general comment (b)).</p> <p>All four options must be considered in conjunction. They should not be exclusive. Designated sites must obviously be given due protection.</p> <ul style="list-style-type: none"> • 1. Sites of national and international importance for nature conservation value i.e. the South Pennine Moors Special Protection Area and the 4 Sites of Special Scientific Interest • 2. Regional priorities for habitat restoration and creation i.e upland heath, floodplain habitat and woodland. • 3. Key habitats and species identifies in Bradford’s Local Biodiversity Action Plan and wildlife corridors • 4. Ensuring that development proposal have a minimal impact on the overall biodiversity resource and enhance it wherever possible 	
<p>The District’s climate is changing. The consequences of which are already being noted:</p> <p>The increased incidents of winter flooding and summer droughts are already having a noticeable impact on fish stocks in the River Wharfe. Spring bulbs such as bluebells are emerging ever earlier along with the leaf buds of several tree species- a sudden frost could be very damaging to these plants. The lack of good hard frosts in winter has also led to problems with parasites; the strongil nematode worm population explosion that recently decimated the Ilkley Moor grouse population was mostly caused by by the wet summer and mild winter of 2005. There are fears</p>	<p>Environment Partnership</p>

<p>that this worm could also affect some species of wildfowl. Sheep ticks and deer ticks which can also parasitise both dogs and humans have also increased.</p> <p>In order to respond to these changes, planting and maintenance regimes should be adjusted wherever possible to reflect these changes. The tree planting activity in the District should be continued and wherever possible extended through the climate offset programme recently established by the Forest of Bradford project.</p>	
<p>All 4 bullets</p> <ul style="list-style-type: none"> • 1. Sites of national and international importance for nature conservation value i.e. the South Pennine Moors Special Protection Area and the 4 Sites of Special Scientific Interest • 2. Regional priorities for habitat restoration and creation i.e upland heath, floodplain habitat and woodland. • 3. Key habitats and species identifies in Bradford’s Local Biodiversity Action Plan and wildlife corridors • 4. Ensuring that development proposal have a minimal impact on the overall biodiversity resource and enhance it wherever possible 	<p>Ilkley Civic Society</p>
<p>All Options</p> <ul style="list-style-type: none"> • 1. Sites of national and international importance for nature conservation value i.e. the South Pennine Moors Special Protection Area and the 4 Sites of Special Scientific Interest • 2. Regional priorities for habitat restoration and creation i.e upland heath, floodplain habitat and woodland. • 3. Key habitats and species identifies in Bradford’s Local Biodiversity Action Plan and wildlife corridors • 4. Ensuring that development proposal have a minimal impact on the overall biodiversity resource and enhance it wherever possible 	<p>Ilkley Parish Council</p>

<p>Natural England would support emerging policy which, consistent with PPS9 seeks to secure biodiversity gains through development wherever it may occur, proportionate to the development itself and locally responsive to important habitats and LBAP objectives. This should be in addition to exercising appropriate levels of protection for nationally and internationally designated sites of nature conservation importance, which should be a primary consideration and priority for the planning authority. In this context it would be inappropriate for us to express a preference to divert attention at one element of the natural environment so that another would benefit. The plan should meet expectations in respect to higher tier sites, but also present a positive and aspiration approach to protection and enhancement of locally important habitats and species.</p> <p>The four bullet points set out below question 7.1 are all worthy and valid aspirations for a spatial planning document, and the LDF should seek to integrate and secure protection and enhancements of such assets through a proactive policy framework which makes clear that good design and developers will be expected to protect and enhance such interests through implementation of schemes. Local initiatives and the LBAP do however present a clear reference for the focus of enhancement priorities where development opportunities occur.</p> <ul style="list-style-type: none"> • <i>1. Sites of national and international importance for nature conservation value i.e. the South Pennine Moors Special Protection Area and the 4 Sites of Special Scientific Interest</i> • <i>2. Regional priorities for habitat restoration and creation i.e upland heath, floodplain habitat and woodland.</i> • <i>3. Key habitats and species identifies in Bradford's Local Biodiversity Action Plan and wildlife corridors</i> <p><i>4. Ensuring that development proposal have a minimal impact on the overall biodiversity resource and enhance it wherever possible</i></p> <p>Natural England, consistent with its strategic level observations, would wish to see the biodiversity suite of policies adopt a climate change adaptation element. Impacts of climate change may already be the beginning to be experienced. Policy should make provision for</p>	<p>Natural England</p>
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<p>assisting the district's biodiversity to cope with the impacts such as habitat change, species creep or migration and changes to water flows and flooding events.</p>	
<p>All four options developed are important priorities for the Council.</p> <ul style="list-style-type: none"> • 1. Sites of national and international importance for nature conservation value i.e. the South Pennine Moors Special Protection Area and the 4 Sites of Special Scientific Interest • 2. Regional priorities for habitat restoration and creation i.e upland heath, floodplain habitat and woodland. • 3. Key habitats and species identifies in Bradford's Local Biodiversity Action Plan and wildlife corridors • 4. Ensuring that development proposal have a minimal impact on the overall biodiversity resource and enhance it wherever possible <p>The Core Strategy should fully reflect national policy as set out in PPS9, and its duties to conserve priority habitats under the Countryside and Rights of Way Act (2000). We also note the Council's duty as stated in Section 40 of the Natural Environment and Rural Communities Act (2006) to have regard to the purpose of conserving biodiversity when exercising its functions.</p> <p>The Core Strategy will need to contain policy to support the options identified. In addition to providing strong protection to nationally and internationally important wildlife sites, the Core Strategy should also provide robust, criteria-based policy to protect and enhance Bradford Wildlife Areas as per paragraph 9 of PPS9.</p> <p>As set out in paragraph 5 (ii) of PPS9, the LDF should identify sites for the restoration or creation of regional priority habitats. Such sites are also likely to deliver local BAP targets. These sites and the habitats to be restored should be listed within the Core Strategy, and identified on the Adopted Proposals Maps to ensure that these areas are protected from inappropriate development. We strongly urge the Council to refer to the following data sources when identifying and mapping sites:</p>	<p>RSPB</p>

<ul style="list-style-type: none"> • The SSSI condition data for the South Pennine Moors, to identify units within Bradford that are in unfavourable condition • Policy ENV8, Paragraph 15.61 and in particular Figure 15.5 Habitat Enhancement Areas within the draft RSS • The mapping of areas offering potential wetland restoration opportunities within the <i>Yorkshire and Humber Wetland Feasibility Study</i>, produced by the Environment Agency, the Countryside Agency, English Nature and the RSPB (we can provide this on request). The Study identifies potential opportunities within the catchments of the Aire and Wharfe to deliver the restoration of wetland BAP habitats. <p>We recommend the adoption of the Bradford local Biodiversity Action Plan (IBAP) Council as an SPD to advise developers how to protect and enhance important local habitats. The Core Strategy should stress the need to consult the IBAP at the design stage of developments. Local resources should be focussed on the successful delivery of the IBAP - this should be used as a basis to monitor the performance of the Core Strategy. In particular, we encourage the Council to strongly support the delivery of the Species Action Plan for twite. Twite is a red-listed bird of conservation concern that has experienced significant declines throughout England: the South Pennines is now the stronghold for this species in the country.</p>	
<p>The Local Development Framework needs to stress the importance of retaining good quality habitat institute. Habitat creation and translocation should only be considered when the over-riding need for the development means that habitat will be lost. This hierarchy of decision making, is set out in PPS9, but needs to be stressed in the LDF. There is a trend for creating and translocating habitat, rather than adapting designs to incorporate the needs of existing wildlife. These newly established habitats may superficially resemble those which they are designed to replace. Botanically they may have similar species, but they will not have stable soil chemistry, hydrology or biology, invertebrate communities will be different, plants are unlikely to be of local genetic stock and the change in geographical location may have implications beyond</p>	<p>West Yorkshire Ecology</p>

the site boundary for other species.

The Local Biodiversity Action Plan should be cited as a useful guide for prioritising enhancement and habitat creation schemes, but it should be remembered that the limited number of habitats currently covered by the plan might not always be the most appropriate for a particular site's location and conditions.

The Options indicate three regional priorities for habitat restoration and creation, which do not tie in closely with the four-habitat action plans in the Local BAP, in-bye grassland, hedgerows, river corridors and upland woodland.

There is also no indication that the objective for such schemes should be to create better links between existing high quality sites through a process of site extensions, stepping stone sites or enhanced corridors. This approach reduces fragmentation and associated risk of local extinctions, and also provides better opportunities for species to adapt to climate change. Para 5ii of PPS9 indicates that areas or site for restoration or creation should be identified in the LDF. I would interpret this as meaning that strategic corridors for wildlife should be identified on the proposals map. The three habitats which you have chosen might be modified to the following:

1. Upland habitats including upland heath, blanket bog and wet or unimproved grassland on the moorland fringe.
2. Floodplain habitats including rivers, standing open water, bog, fen, wet grassland, species rich unimproved grassland and wet woodland.
3. Ancient and semi-natural woodland.

The role which boundary structures, in particular hedgerows and drystone walls, play in the ecology and landscape of the region should also be recognised. Both are threatened directly by development decisions and indirectly as land use change leads to neglect.

One aspect which I did not pick up from the consultation document was the importance of green

<p>infrastructure within the district. This can be divided into two types, networks of green corridors penetrating into urban areas and maintaining strategic gaps between settlements. Both of these help to facilitate the passage of wildlife throughout the district and, with careful thought given to design and management, can bring people and wildlife closer together enhancing quality of life. Native species in planting schemes, the use of hedgerows rather than fences, flower rich meadows and wetlands can all add to a higher quality environment through the development process.</p> <p>The opportunity to enhance the rural environment of Bradford should not be over-looked. In particular the need to support agricultural diversification schemes which link enhanced quiet recreation and tourism initiatives to Environmental Stewardship and England Woodland Grant Schemes. These allow farm businesses to adapt to changing markets whilst maintaining and enhancing the environment.</p> <p>The importance of maintaining and enhancing the network of river and beck corridors can not be over-stated. They are important for species like migratory fish, otters and white-clawed crayfish which depend on continuity of habitat, but enhancing river corridors, especially by setting back development from the waters edge, can also improve flood carrying capacity in urban areas. This needs to be done through a long term strategic programme, taking advantage of sites which are being redeveloped along water courses.</p>	
<p>Q 7.2 USING THE LANDSCAPE CHARACTER ASSESSMENT AS A FRAMEWORK WHERE SHOULD POLICY EMPHASIS AND RESOURCES BE FOCUSED?</p>	
<p>In principle, an analysis of the various local landscape areas and the sensitivity of each of those areas to change should provide a useful framework for decision-making. However, we have been unable to obtain sight of the landscape character assessment. Consequently, it has not been possible to ascertain how useful that particular assessment might be. If that assessment is going to be used as the basis for determining planning applications, it should be more readily available (perhaps on the council's website)</p>	<p>English Heritage</p>

<p>Irrespective of the above, since the assessment was undertaken in 2003, it needs to be updated to take account, where necessary, of the work undertaken on Bradford's conservation area appraisals (which, in many cases, included an assessment of the landscapes setting each of the settlements) and the work which was carried out on the landscape setting of the world heritage site (as part of the Saltaire capacity study) It should also be cognisant of the work which is about to commence by WYAS on the historic landscape characterisation of the district.</p> <p>In terms of where resources are focussed, we would not necessarily disagree with any of the options proposed. However, we have the following comments to make on options suggested:-</p> <ol style="list-style-type: none"> 1. Second bullet point- <i>[Landscapes with strong historic and cultural associations that attract visitors to the District]</i> whilst we would broadly support a policy emphasis and a focussing of resources on those historic and cultural landscapes that attract visitors to the district but which are not currently tourist destinations 2. Those landscapes which could improve the setting of its conservation areas (as identified in the conservation area appraisals) it's listed buildings or its scheduled monuments and could therefore, increase the attractiveness of those settlements as places to live and invest. 3. Third bullet point- <i>[Mitigation measures where development is proposed and maintaining the status quo elsewhere]</i> where development is proposed, the intention should be not just to mitigate any adverse impacts but to actually achieve and overall enhancement of the landscape 4. 	
<p>Bullets 1 and 2.</p> <ol style="list-style-type: none"> 1. <i>Derelict and despoiled urban fringe landscapes.</i> 2. <i>Landscapes with strong historic and cultural associations that attract visitors to the District</i> <p>To encourage the public to become more involved, we propose the funding of Community Landscape Character Assessments. For example, AONB land, and former industrial landscapes. A special case could be made for the 'literary landscapes' around Haworth</p>	<p>Ilkley Civic Society</p>
<p>All options</p>	<p>Ilkley Parish Council</p>

<p>1. Derelict and despoiled urban fringe landscapes.</p> <p>2. Landscapes with strong historic and cultural associations that attract visitors to the District</p> <p>3. Mitigation measures where development is proposed and maintaining the status quo elsewhere</p>	
<p>Landscape character is everywhere, regardless of perceived quality, and is key component of local distinctiveness and helps frame 'sense of place'. Reference to the LCAD of the district is welcomed and Natural England supports a policy framework, which builds on the findings and objectives of that study, particularly in respect to constrain and sensitivity in the most sensitive landscapes, and in terms of positive landscape restoration, especially in accessible countryside around towns. Such areas can be an important element of green infrastructure and when well managed provide multiple benefits to the local community in terms of recreation opportunities and access to nature.</p> <p>In terms of prioritising landscape focus, Natural England would again be concerned about prioritising one area against another, as local landscape quality can be important wherever you are. However, degraded edge of settlement sites should be well planned and positive restoration strategies encouraged because of the multiple benefits they can afford local communities and business. The interlinkages with the biodiversity interest of such sites should be influential on policy and integrated approaches pursued.</p>	<p>Natural England</p>
<p>In addition to the PROWs Bradford also now includes a substantial area of access land covered under the Countryside and Rights of Way (CROW) Act. Whilst many references are made throughout the Documents to the extensive rural content of the District, and to distinctive landscapes, and to the need to protect landscape areas, as well as maintain and enhance distinctive landscapes (3.6 & 3.7 of Paper 7), we feel more emphasis should have been placed on the issues of access and landscape protection of those access areas covered by the CROW Act.</p>	<p>The Ramblers Association</p>

<p>Whilst brief mention is made under Paper 7, Biodiversity and Landscape, of the South Pennine Moors Special Protection Area, and the urban fringe landscape of the South Pennines, together with Policy NE3 of the RUDP, insufficient emphasis is placed under 3.9 Options on access issues.</p> <p>Whilst 3.9 does refer to the landscape backdrop it appears to be concerned with settlement edges. We consider that it is these open moors that provide a backdrop and an escape from the surrounding landscape of past industrial activity. This is a distinctive feature of the character of the whole district not just the settlement edges, and the value of this for recreational purposes should be better recognised.</p>	
HERITAGE ASSETS AND BUILT FORM	
Q 7.3 'HOW SHOULD PRIORITIES BE DETERMINED FOR THE PROTECTION AND MANAGEMENT OF BRADFORD'S HERITAGE ASSETS?'	
<p>Saltaire is an obvious priority for the protection and management of Bradford's heritage and is required as part of its World Heritage site status. However, this should not be at the expense of other heritage assets, so a broader approach is supported. Work should also be focused on supporting owners to bring listed buildings at risk into use though advice.</p>	Airedale Partnership
<p>As a whole, the historic environment makes an important contribution to the character of Bradford, to its economy, and to the quality of life of its communities. Therefore, it is difficult to prioritise any one of the options being suggested over the others. Consequently, we would favour a <u>strategy that is based upon a combination of the three proposed</u> to which we would also add <u>1. According to the results of the scheduled monuments at risk survey</u></p> <p>As part of a strategy to identify, safeguard and enhance locally important elements which contribute to the distinctiveness of Bradford (<i>building in part upon the work undertaken in the conservation area appraisals</i>) there is support for such an approach within national policy and in the recently published heritage white paper.</p>	English Heritage

<p>Priority should be given to protecting those heritage assets which can be financially self-sustaining.</p>	<p>Environmental Partnership</p>
<p>Bullets 1 and 2 1. According to the results of the Conservation Area Assessments 2. According to the results of the Listed Building at Risk Surveys</p>	<p>Ilkley Civic Society</p>
<p>Bullets 1 and 2 1. According to the results of the Conservation Area Assessments 2. According to the results of the Listed Building at Risk Surveys</p>	<p>Ilkley Parish Council</p>
<p>3.11 - we have commented in detail on the draft RSS and as we pointed out in the Regional Assembly, the pre-historic remains on Ilkley moor and the southern Pennines are some of the most important remains of their type known nationally. They should certainly be mentioned in para 3.11 as a relevant locally important element of the historical environment as they are a key part of Bradford's distinct identity, as are mills, chimneys etc.</p> <p>It is acknowledged that the RUDP contains a range of policies seeking to protect Bradford District's rich and diverse built heritage and historic environment. Do we take it that these policies will be carried forward into the LDF? It is not stated what the intention is here. There are weaknesses in the current policies that could be significant and warrant recording prior to development, as Calderdale's UDP acknowledges. This helps avoid arguments with developers that because a building is not listed it does not mean that it is not archaeologically interesting or significant.</p> <p>The view of the WYAAS is that the LDF should use the grading explicitly included in the current system of heritage protection and continued in the proposed Heritage Protection Review, which has just been published in March 2007.</p>	<p>West Yorkshire Archaeology Advisory Service</p>

<p>World Heritage status simply international importance. Scheduled ancient monuments are all by definition of national importance and can be equated to Class 1 and II listed buildings, then class III listed buildings (which are still of national importance). Conservation areas are designed locally as would any structures on a local list that the recently published white paper recommends that local authorities should maintain. This would also include regionally important archaeological remains that do not qualify for statutory protection. Below regional importance are remains of more local significance, which should be retained and protected where possible, but where recording prior to destruction might be a more appropriate way of reconciling them with the needs of development.</p> <p>All of the above are of importance, but some are more important than others and this, allied to their degree of risk and/or ability to contribute to local identity, sense of place, education etc should help guide priorities for protection and management.</p>	
<p>We believe a combination of all three options will preserve and protect the natural and built environment.</p>	
<p>Q 7.4 ‘WHAT SHOULD BE THE OVERALL APPROACH IN THE CORE STRATEGY TO ACHIEVING HIGH STANDARDS OF DESIGN FOR NEW DEVELOPMENT?’</p>	
<p>We need to aim for high quality and inspirational new build that takes into account of all elements of sustainable design, including green roofs, renewable energy, sustainable drainage systems etc. Development should respect and reflect its context but good quality and sustainable can best be achieved by the development of detailed design criteria. This needs to reflect the diversity of the District and reflect the local context, and consider Bradford’s aspiration of an eco-city/district. One of the recommendations of the Masterplan was to develop a Design Guide for Airedale to complement that of the City Centre</p>	<p>Airedale Partnerships</p>
<p>A combination of the three options should be adopted in conjunction with the approach suggested below in answer to question 7.4.</p>	<p>Bradford Centre Regeneration</p>

<p>1. <i>Aim for development that respects and reflects its context and is accessible to all</i> 2. <i>Aim for the highest standards of innovation and design for individual buildings with limited reference to context</i> 3. <i>Put the emphasis on setting detailed design criteria and only accepting development that meets these standards throughout the District.</i> 4. <i>Identify distinct areas where particularly high standards of design would need to be met, whether these be conservation areas, the City Centre or Neighbourhood Renewal Areas.</i></p> <p>The question should also cover the conversion of existing buildings of heritage value. The LDF policy should put high quality design at its heart and use the approach adopted in the city centre. The e exceptionally high quality of Bradford’s built environment is not only about its protection and management but also about using this quality as a differentiator for Bradford.</p> <p>Option 2 [<i>Aim for the highest standards of innovation and design for individual buildings with limited reference to context</i>] should be disregarded and the other three options should form the LDF policy:</p> <p>1. <i>Aim for development that respects and reflects its context and is accessible to all</i> 3. <i>Put the emphasis on setting detailed design criteria and only accepting development that meets these standards throughout the District.</i> 4. <i>Identify distinct areas where particularly high standards of design would need to be met, whether these be conservation areas, the City Centre or Neighbourhood Renewal Areas.</i></p> <p>A design guide or series of guides for the city and District should be developed. The establishment of a design panel, and/or use of CABE, for design reviews of significant and/or controversial projects should be introduced</p>	
<p>Given the recognition of the importance of the distinctive character of the area, the LDF should be pursuing a strategy in which new development is appropriate for its context. Such an</p>	<p>English Heritage</p>

<p>approach would not prevent innovative design but would instead, ensure that new buildings do not harm those aspects which are important to the character of the district.</p> <p>The LDF should set out detailed criteria against which proposals will be assessed and in order to ensure that high design standards are achieved, development which did not meet these standards would not be approved. In line with the government advice, the council should actually make it explicit that development which did not take the opportunity to improve the character of an area (wherever that may be in Bradford) would not gain approval.</p> <p>We would endorse an approach which identifies those parts of the district where the council will be seeking particularly high standards of design (and we would support the inclusion of conservation areas and the world heritage site as examples of such areas) for these parts of Bradford.</p>	
<p>In accordance with PPS1 and the recently published draft PPS1 Climate Change Supplement, climate change and sustainability is an important issue in planning. As such, the design of buildings, which use sustainable construction and energy efficiency to minimise their impact on climate change, should be the top priority.</p>	Environment Agency
<p>Priority should be given towards whole-life costs for developments. The trend is for more and more pressure to come through regulation towards meeting the Governments Carbon dioxide reduction targets. Developers should be encouraged to follow the guidance set out in the Council's Sustainable Design Guide and set standards higher than those set through regulation in order to use this as a positive marketing opportunity.</p>	Environmental Partnership
<p>Bullet 1</p> <p>Aim for development that respects and reflects its context and is accessible to all</p> <p>The problem with emphasising conservation areas is that the areas out with them are not protected and treated less sympathetically – especially small groups of buildings or mixed areas.</p>	Ilkley Civic Society

<p>Bullets 1,2 and 4</p> <ol style="list-style-type: none"> 1. Aim for development that respects and reflects its context and is accessible to all 2. Aim for the highest standards of innovation and design for individual buildings with limited reference to context 4. Identify distinct areas where particularly high standards of design would need to be met, whether these be conservation areas, the City Centre or Neighbourhood Renewal Areas. 	<p>Ilkley Parish Council</p>
<p><u>We support the options given.</u> However, an important element of the built environment is the quality of the open spaces within and around it.</p> <p>The Council should adopt policy that protects and enhances the biodiversity value of open spaces in the built environment, and reflect paragraph 14 of PPS9 by ensuring that developers maximise the opportunity to incorporate wildlife-friendly features within the design of developments.</p>	<p>RSPB</p>
<p>Sport England considers open space/ sport and recreation facilities should be protected with a strategic over view in mind; that developer contributions should have regard to open space assessments and associated strategies; and that the development of a green network of urban open spaces linked with the open countryside should be supported in principle.</p> <p>Developer contributions should however also have regard to provision of necessary indoor sport and leisure facilities required to support development schemes, based also on a firm evidence base. Sport England data bases on Active Places and Active People can assist.</p>	<p>Sport England</p>
<p>It should respect and reflect its context</p> <p>[Aim for the highest standards of innovation and design for individual buildings with limited reference to context]</p>	<p>West Yorkshire Archaeology Advisory Service</p>

CLIMATE CHANGE AND USE OF RESOURCES	
Q 7.5 'IN FRAMING A STRATEGIC LEVEL POLICY FOR SUSTAINABLE DESIGN, WHICH APPROACH SHOULD THE COUNCIL FAVOUR?'	
<p><i>Sustainable design should be encouraged by targeting local areas in which to test certain approaches.</i> [Option 3] Airedale would be a good test bed for green roofs, given the importance of the green landscape to the area and for sustainable urban drainage schemes given the threat of flooding.</p>	Airedale Partnership
<p>For sustainable design, a laissez faire approach as suggested in option 1 is to preferred. <i>1. Allow developers together with pressure from consumers and national government to determine whether and where higher standards of sustainable design are achieved.</i> Option 2 and 3 might be viewed as aspiration however. <i>2. Identify circumstances or particular sites in the planning framework, perhaps sites over a certain size, Greenfield sites or locations in strong market areas, where higher levels of sustainable design would need to be met.</i> <i>3. Focus efforts on targeting local areas within which to test the application of particular aspects of sustainable design e.g. requiring green roofs for development on the edges of settlements or sustainable urban drainage schemes for areas where infrastructure is under pressure.</i> There must be recognition, at this early & vulnerable stage in Bradford's regeneration. That deriving for standards above statutory levels could deter all but the most progressive of developers; unless of course the public sector was in a position to underwrite these higher standards, at the very least the Council might seek to ensure through the LDF that all public sector developments, including Council developments, achieve exemplar status.</p>	Bradford Centre Regeneration
<p>BWEA strongly urges the Council <u>to include a prescriptive micro-generation policy</u> and reference to the positive contribution that such a policy can have in increasing overall level of energy efficiency while significantly reducing energy related carbon emissions within development.</p>	British Wind Energy Association

<p>BWEA emphasises the contribution that small renewable systems can make, and considers that the Council should implement a policy for mandatory requirement of onsite renewables. Such a policy would require onsite renewables to provide electricity for at least 10% of all new buildings' needs (including refurbishments). In addition to stringent energy efficient/building performance requirements.</p> <p>BWEA recommend the <u>inclusion of a discrete policy on sustainable design and construction methods</u>, and the introduction of minimum efficiency standards for extensions, change of use conversions and refurbishments/listed building restorations. Such a policy would help ensure increases in energy efficiency within the existing building stock, as well as in new build development. BWEA recommend looking at the Renewable Energy Toolkit for planners, developers and consultants, developed by the London Energy Partnership for further guidance.</p> <p>In addition, BWEA recommend that the development plan provide a brief outline of the different renewable energy generation technologies, and equally encourage and promote <u>all</u> forms of renewable energy (solar, biomass, wind, geothermal, hydro etc). The potential for an Energy Services Company and site wide CHP should also be considered for inclusion.</p>	
<p>We would strongly support the Council in taking opportunities in your Core Strategy for tackling climate change rather than leaving this to market forces. We consider this must include the setting of targets for renewable energy generation and sustainable design and construction (including sustainable design. This will accord with PPS1 and its Climate Change Supplement. The following wording is suggested as an example of good practice which comes from a policy already adopted in Calderdale Council's UDP.</p> <p>“All new major developments (either new build, conversion or renovation) will be required to incorporate on-site renewable energy generation to provide the following proportions of predicted energy requirements: -</p> <ul style="list-style-type: none"> • 10% for the five years following Core Strategy adoption; 	<p>Environment Agency</p>

- 15% for the following five years
- 20% from then on”.

We would advocate that major development is defined as follows: -

For residential - Ten or more dwellings or, where the number of dwellings is not specified, where the site area greater than 0.5 hectares

For non-residential – Where the floor area is greater than 1,000 sq. m or, where the floor area is not specified, where the site area is greater than 1 hectare

In respect of options, we would strongly advocate a further approach to use an iterative policy (as above). This reflects the growing knowledge and expertise of the construction industry, the reduction in prices of renewable technologies as the field grows, and the over-arching importance of the climate change issue as a whole. Consideration should also be given to wording the policy so that it covers all non-householder development, not just major development.

Additionally, we would also suggest that the Core Strategy considers sustainable construction and in this regard we would further suggest a policy which could read:

"All new developments will be expected to achieve high standards of Sustainable Construction and may be required to meet certain accepted standards such as BREEAM/Eco Homes/Code for Sustainable Homes. All developments involving renovation, refurbishment or change of use will be encouraged to achieve the same standards."

The current options being considered are not acceptable as they all miss this opportunity presented by the LDF, having regard to the draft PPS1 supplement recently published, to drive the need for sustainable buildings.

<p>Response: The Partnership supports the general policies of localising procurement as much as possible, of a whole-life costings approach, and following the option of identifying circumstances or particular sites in the planning framework where demonstration developments involving higher level of sustainable design would be delivered.</p>	<p>Environment Partnership</p>
<p>We would stress that sustainability standards are already being set by Building Regulations and the new Code for Sustainable Homes. The Council’s planning policies should not seek to replicate or replace these (as PPS1 makes clear). The Code will supersede Ecohomes. Therefore, HBF considers that planning authorities should focus on the overall objectives of carbon reduction and the details of how to deliver this objective. Additionally the Code for Sustainable Homes should be used as a single national standard.</p> <p>The draft PPS: Planning and Climate Change (supplement to PPS1) paragraph 31 states ‘planning authorities should not need to devise their own standards for the environmental performance of individual buildings as these are set out nationally through the Building Regulations. Higher standards for new homes are set out in the Code for Sustainable Homes. For new homes, local standards should be based on the Code for Sustainable Homes.</p> <p>Paragraph 1.8 of PPS12 makes it clear that planning policies should not seek to duplicate or cut across matters more appropriately within the scope of other legislative regimes. Energy efficiency in building use and construction is manifestly the responsibility of the building regulations Part L. There has already been an extremely rapid improvement in performance over the past few years and new homes are now significantly more energy efficient than even recently built existing stock. There must come a point at which, if we are to make real efficiency gains, more attention is diverted to the real culprit, namely the existing stock, rather than constantly opting for the easy option of further restrictions on new building. These requirements are making new homes ever more expensive at a time when affordability is a very serious concern and also at a time when these features are not wanted by consumers. Efforts should be focused on changing public perception of the issue if this is not to be a very costly mistake.</p>	<p>Home Builders Federation</p>

<p>Further versions of the Core Strategy should be worded more flexibly in recognition of these concerns. Improving the environmental standards of our homes should be achieved through standards set at the national level - the Code for Sustainable Homes and Building Regulations.</p>	
<p>None of the options. <u>Suggest</u> 'Encourage all developers to follow the BMDC Sustainable Design Guide for all locations in the BMDC area'.</p>	<p>Ilkley Civic Society</p>
<p>Sustainability should form part of all developments. See Bradford's 'Sustainable Design Guide'</p>	<p>Ilkley Parish Council</p>
<p>We would be concerned that an approach which is dependent upon community and developer led initiative to implement higher than building regulations. Standards in new development would be ineffective in achieving its goal due to short term cost implications. However it is important that the real economics are understood so that rational approaches can be made which do achieve delivery of more sustainable design, but which does not stifle development which directly enhances the natural environment at the local level. Clearly, sites over a certain size threshold are likely to afford economies of scale which can help deliver fledgling sustainable design measures.</p> <p>Whilst strongly supporting the move towards <i>securing sustainable design in new development</i> would also seek policy to be sensitive of sense of place and landscape character, particularly in the rural parts of the district. For example, whilst green roofs or passive solar heating orientation may be sustainably sound, the impact they may have on local distinctiveness and landscape character in and around settlements may be significant. The policy suite should have full regard to the impact on valued built environments from such approaches.</p>	<p>Natural England</p>

<p>We welcome the recognition given to climate change as a significant issue. Given the extent of new development envisaged in the Issues and Options, we strongly encourage the Council to require all new buildings to be constructed to the relevant EcoHomes or BREEAM ‘excellent’ standard in order to optimise this contribution.</p> <p>The Council should also set an ambitious target for on-site renewable energy generation within new developments – and require all developments, either new build or conversion, to incorporate on-site renewable energy equipment to reduce predicted CO² emissions by at least 10%. We encourage the Council to carefully consider the option of a 20% reduction in emissions for new buildings with a floorspace of 500m² or more.</p> <p>We support the emphasis on <i>Sustainable Urban Drainage Systems (SUDS)</i>. [Option 3] These can reduce the impacts of new developments on flood risk through a range of measures, including the creation of ‘balancing’ ponds that can be designed to have a high biodiversity value. The Council should require developments to incorporate SUDS: the onus should be on developers to demonstrate why SUDS are not technically feasible if they are not being used.</p>	<p>RSPB</p>
<p>The core strategy should encourage proposals to minimise energy and water use by considering the incorporation of on-site renewable energy generation. In addition, development schemes should adopt sustainable construction principles and consider using local labour and locally sourced or recycled building materials. We would welcome a commitment to new developments to meet particular sustainability standards such as BREEAM or Ecohomes rating of ‘very good’ or ‘excellent’ as a minimum.</p>	<p>Yorkshire Forward</p>
<p>Sustainable design should be implemented wherever feasible, regardless of how the local environment/infrastructure is. This provides an opportunity for us to not only protect the natural environment but to enhance it. The section below sets out Yorkshire Water’s policy on Sustainable Urban Drainage Systems:</p> <p>The use of SuDS is encouraged by Yorkshire Water Services (YW) whenever practicable.</p>	<p>Yorkshire Water</p>

Correct implementation will reduce the rate and volume of surface water draining into the public sewer network by allowing the water to drain naturally into the ground or slowing discharge into the public sewer. This in turn protects the public sewer from overload and the environment from pollution. Where surface water would have traditionally drained into a combined foul and surface water sewer, the use of SuDS prevents relatively clean surface water from passing through the wastewater treatment process. The use of certain types of SuDS for highway drainage has the advantage of 'inbuilt' pollution control, for example the vegetation in grass swales can be effective at filtering oil and grit out of the surface water run off from highway.

From a YW viewpoint, there are however a number of constraints which impact on the implementation of SuDS for inclusion as part of the public sewer network. These are set out below. A clear explanation of these may assist with successful implementation of SuDS in the future.

Scale of Development

SuDS can be effective when implemented on all sizes of development. Given the focus on optimising the use of brownfield sites, particularly in existing urban areas, the implementation of SuDS on small scale developments should be encouraged as this could have a large scale cumulative impact on the level of surface water draining naturally.

YW would support the inclusion of policy which

1. requires all developers to demonstrate that the feasibility of using SuDS has been explored in the design of their development.
2. requires developers to incorporate SuDS into the design of their development where a feasibility study indicates that it would be appropriate.
3. requires the developer to ensure that there is a maintenance plan in place for SuDS where such a scheme is to be implemented as part of a planning permission.

ENERGY	
Q 7.6 ' HOW SUPPORTIVE SHOULD THE POLICY CONTEXT BE TOWARDS THE DEVELOPMENT OF RENEWABLE ENERGY SOURCES?'	
<p>Given the District's aspiration to become an Eco-City the policy framework should include <i>aspirational targets aimed at raising Bradford's profile as a leader in 'green' issues.</i></p>	<p>Airedale Partnership</p>
<p>BWEA believe that the LDF should be fully supportive of all forms of renewable energy and should introduce a robust criteria based policy following the advice of the annex to PPS1 and PPS22.</p> <p>BWEA believes that the LDF should briefly outline the different renewable energy technologies, and equally encourage and promote <u>all</u> forms of renewable energy (solar, biomass, geothermal, hydro etc). The Annex to PPS1 states local planning authorities should look favourably on proposals for renewable energy. It also states that LPAs should not require applicants to demonstrate the overall need for renewable energy in certain locations and that they should avoid policies that set stringent requirements for minimising impact on landscape and townscape if these effectively preclude the supply of certain types of renewable energy.</p> <p>It is important that the LDF presents an objective and robust approach to renewable energy for the wider and local benefit, rather than a restrictive policy in response to renewable energy objectors. In addition, the LDF must not demonstrate an assumption that renewable energy developments will have negative effects, nor should it fail to fully recognise the many local benefits that arise through renewable energy developments. BWEA recommend the Council include a specific development control policy on renewable energy, providing direct reference to PPS22 and its Companion Guide.</p> <p>The criteria to be considered for renewable energy developments within the LDF could fall under three main headings: <u>residential amenity</u> – this includes many common issues that arise through renewable energy developments; <u>environmental effects</u> – covered by the EIA (or environmental information as requested by the Council); and <u>landscape effects</u>. If required, then the most</p>	<p>British Wind Energy Association</p>

<p>appropriate tool for assessing all these aspects of development is the EIA. A well executed EIA allows both broad and site specific criteria to be fully studied and evaluated. The criteria to be taken into account should only include planning considerations (i.e. not wind speed, economics etc), and should aim to achieve a balance of all considerations, both benefits and adverse effects. BWEA emphasises the contribution that small renewable systems can make, and considers the Council to should implement a policy for the mandatory requirement of onsite renewables. Such a policy would require onsite renewables to provide electricity for at least 10% of all new buildings' needs (including refurbishments), in addition to stringent energy efficiency/building performance requirements. Recent research by the Department for Communities and Local Government found that around a third of Local Authorities surveyed are introducing such polices within Development Plans¹. Following this research the Government is now urging all Council's to include such policies in their Local Plans².</p> <p>The following wording is highlighted as an example: <i>'All non-residential or mixed use developments (new build, conversion, or renovation) above a threshold of 1,000m² will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.</i> <i>All residential developments (new build, conversion, or renovation) of 10 or more units will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.'</i></p>	
<p>Whilst we would endorse the council setting aspirational targets for renewable energy, these should not be at the expense of other sustainability criteria, especially its landscapes. The topography of the district could make it difficult to accommodate, for example, large wind farm developments without compromising the character and setting of some of its historic settlements.</p>	<p>English Heritage</p>
<p>The Partnership is very supportive of a policy framework with aspirational targets aimed at raising Bradford District's profile as a leader in the introduction renewable energy.</p>	<p>Environment Partnership</p>

Future Energy Yorkshire believes that Bradford MDC should adopt a very supportive policy framework with challenging targets that will enable Bradford to become a leader in 'green' issues.

Bradford should seek to identify targets based on annual output and hence emissions reductions. FEY would advise Bradford to develop targets for both on-site, embedded renewable energy generation (as recommended in PPS22) and for stand alone, grid connected generation. FEY advises that Bradford should also consider a target for CHP installation due to the associated carbon savings. FEY would like to see Bradford develop goals which are challenging and go beyond regional targets.

FEY would like Bradford to follow examples and aim to be an exemplar authority to ensure the wider sustainable development objectives are realised from pushing forward a renewable energy agenda.

To ensure targets are achieved and these wider benefits are realised, FEY would advise that additional policy should be developed in the form of a Development Plan Document (DPD). The UDP has a supplementary planning guidance for wind turbine developments; FEY would support this being brought forward and strengthened within the LDF to include a specific DPD for Sustainable Energy. FEY would favour a Sustainable Energy DPD to ensure that all carbon saving technologies, such as CHP, can be included. A Sustainable Energy DPD would signal to the region and stakeholders the importance and value that the council is placing on sustainable energy.

FEY would encourage the council to use the DPD to provide supplementary planning documents for wind turbine developments (as per the UDP) and other renewable technologies, for example biomass heating, community heating, and micro hydro. This format is advocated within PPS 22.

FEY believe that developing a Sustainable Energy DPD would be of benefit on two levels:

- The consultation process would enable community involvement and vigorous examination which will ultimately promote dialogue and communication. This should allow planning applications for renewable projects to be processed smoothly, with stakeholder support; and

Future Energy Yorkshire

<ul style="list-style-type: none"> • The DPD would encourage the council to actively investigate, identify and perhaps zone areas within Bradford that could be priority areas for renewable developments. 	
<p>Bullet 2 <i>Very supportive policy framework with aspiration targets aimed at raising Bradford's profile as a leader in 'green' issues.</i></p>	<p>Ilkley Civic Society</p>
<p>We would be supportive of an ambitious policy framework for the delivery of renewable energy generation in the district. However the 'global' benefits this can accrue should not be automatically prioritised against the local, regional or national importance of natural environmental assets such as Pennine landscapes or significant nature conservation interest. Policy for the encouragement of renewable energy generation should be prepared which sets out stringent criteria for the assessment of impacts upon the natural environment and landscape. In particular, development of wind farms should be considered with full regard to landscape impact, including indivisibility considerations and cumulative effects. Moreover, the impact upon bird/bat flight corridors and the impact of servicing development such as new tracks, overhead wires and service buildings should be given close scrutiny through policy.</p>	<p>Natural England</p>
<p>We are broadly supportive of the aspirations of the Approach to Climate Change as well as 3.23 (Paper 7) of the Energy statement. However we have serious doubts about the implementation of policies on windpower and biomass.</p> <p>3.24 of Paper 7 refers to the RSS target for West Yorkshire of 80MW and 270MW renewable energy by 2010 and 2021 respectively. If wind alone was relied upon to deliver the bulk of this it could mean up to 400 of the latest extremely large 2MW rated turbines (in reality only producing 25% of this – hence the need for 400 to satisfy the target) and it is hard to understand how Bradford could take its "fair share" (3.25) of this and be reconciled with its own objectives to protect unique landscapes (including the South Pennines Special Protection) let alone our aspirations to go further than this.</p>	<p>Ramblers Association</p>

<p>3.24 hopes for greater commercial viability of photovoltaics to help deliver the 2021 target. Photovoltaics are not commercially viable at present but we would support the Authority in any effort to promote this, including pressure on HM Government to revise the ROC policy accordingly. We are impressed with the Authority's involvement in groundbreaking technology such as the West City Tower Blocks project and would support further such developments.</p>	
<p>The RSPB supports the development of renewable energy resources, provided the impacts on wildlife are minimised by sensitive siting and design. The Council should ensure that wind energy developments are not permitted in areas where they have the potential to affect nationally- or internationally-designated wildlife sites. In particular, windfarms should be sited away from the South Pennines Moors SPA and adjacent areas where SPA species congregate – SPA species regularly feed in inbye areas surrounding the designated site. Core Strategy policy should contain a presumption against wind energy developments in the vicinity of the SPA, detail the sensitivities in such locations and the need for intensive survey effort to identify any potential impacts on the SPA.</p>	<p>RSPB</p>
<p>We would welcome the core strategy preferred options setting a firm commitment towards encouraging new developments to meet and where possible exceed the renewable energy targets set out within the draft RSS</p>	<p>Yorkshire Forward</p>
<p>To further encourage the development of renewable energy resources, it would be helpful to reflect Policy ENV 5B (iii) of draft RSS (December 2005) at a local level in the Core Strategy.</p>	<p>Yorkshire and Humber Assembly</p>
<p>Bradford should seek to have a very supportive policy framework with targets likely to meet <i>ambitious future targets for renewable energy generation</i>. Where appropriate, on-site generation of renewable energy should be encouraged for both new and existing developments.</p>	<p>Yorkshire Water</p>

Q 7.7 IN SEEKING TO STRIKE A BALANCE BETWEEN ENCOURAGING REGENERATION AND REDUCING FLOOD RISK, WHICH FACTORS ARE MOST IMPORTANT?	
<p>I would like to point out that the most recent flooding in the District was in fact in 2004. Bradford likes to forget about the devastating flooding of Haworth as it does not fit in with their ideals of the area. I would like this recognising in this document Also, no development should be allowed in all areas which have previously flooded no matter what the perceived benefits are until considerable flood prevention work has taken place. Any such development shows a lack of regard for the circumstances. Also to suggest that properties are built with a ground floor that allows flooding is preposterous and does not take into account at all the absolute devastation a flood actually causes.</p>	<p>J. Addie</p>
<p>PPS25 is quite clear on the approach that must now be taken to flood risk. The Sequential Test is an assessment of reasonably available alternative sites at lower risk from flooding. Only when this has been demonstrated can sites in flood risk areas be considered. The Exception Test, when necessary should, used applied with site specific Flood Risk Assessments to determine what types of development will be acceptable and whether mitigation measures can make it 'safe' in accordance with part (c) of the Exceptions Test.</p> <p>Section 4. Reference is made to the 2003 SFRA (although this should also read as Flood). Please refer to our general comments (a) above.</p>	<p>Environment Agency</p>
<p>More intense and frequent rainfall events are expected as a result of climate change leading to greater flood risk in the District. Bradford also has a vital role in managing flood risks not only within the District but also to protect communities further down its river systems in Leeds and elsewhere. Managing flood risk should therefore be an increasingly important factor in determining the location of development.</p> <p>The Partnership support the option of requiring high standards of flood risk assessment from developers and insisting on restrictions of intensity, form and type of development, even where this risks slowing down the process of regeneration.</p>	<p>Environment Partnership</p>

<p>Bullet 3 <i>Require high quality standards of flood risk assessment from developers and insist on restrictions on intensity, form and type of development, even where this risks slowing down the process of regeneration</i></p>	<p>Ilkley Civic Society</p>
<p>Bullet 3 <i>Require high quality standards of flood risk assessment from developers and insist on restrictions on intensity, form and type of development, even where this risks slowing down the process of regeneration</i></p>	<p>Ilkley Parish Council</p>
<p>In developing strategies and policy framework to balance development need with managing flood risk, the council is advised to have full regard to the value of surface water (and ground water) hydrology in terms of landscape and biodiversity. Flooding is a natural process and often the functional flood plain and washlands are important for biodiversity and landscape. Policy should afford proper consideration to these matters as well as the risks flooding present. In general it will be wise to pursue development strategies which avoid as far as possible the need to develop in flood plains or areas at risk from flooding. Sustainable urban design with high absorbance qualities, and retention of woodland and undeveloped areas can help reduce the intensity of flooding as well as having local landscape and biodiversity interest or importance, and hence presents win-win opportunities.</p>	<p>Natural England</p>
<p>We urge the Council to use the sequential approach to <i>identify the most sustainable locations for housing and employment allocations</i>. As well as protecting developments from future flooding, this will help ensure that the functioning of floodplains is not adversely affected. We also encourage the Council to take a more sustainable approach to flood management through wetland restoration to provide additional flood storage capacity. Restored floodplain washlands can improve the ecological quality of rivers and also contribute strongly to the conservation of priority habitats. The creation of high-quality natural habitats within the Borough would make</p>	<p>RSPB</p>

Bradford a more attractive place for people to work, live and invest. This dual approach will ensure the Core Strategy complies with policy ENV8 of the draft RSS, which states that all development plans should “...restore and enhance priority habitats and functional networks of biodiversity in the floodplains...”	
The adoption of Sustainable Urban Drainage Systems for large and medium sized developments would also reduce flood risk and could add to habitat diversity within the urban environment.	West Yorkshire Ecology
We believe the option to acquire high standards of flood risk assessments from developers are essential to deliver truly sustainable regeneration and renaissance within the district	Yorkshire Forward
In regards to the issue of flooding the Assembly prefers the final Option given provided that “ restrictions on intensity, form and type of development ” are appropriate and that it is assumed that the first option would lead to development in unsustainable locations and the second option would lead to problems with public safety and insurance.	Yorkshire and Humber Assembly
Yorkshire Water has no water resource concerns within Bradford at this time and new development is accounted for in our Water Resources Plan which we submit to the Environment Agency. The increased risk of floods due to climate change can be mitigated to some extent by the implementation of SuDS, as described earlier, and we seek to minimise impact of new development on existing infrastructure via the development control process.	Yorkshire Water
Q 7.8 HOW SHOULD THE LDF CONTRIBUTE TO MEETING THE REGION’S NEED FOR AGGREGATES?	
Bullet 3 <i>Examining the need for secondary aggregates and maximising their use where appropriate</i>	Ilkley Parish Council
Paragraph 3.44 confirms that while there are reserves of sand & gravel and certain other minerals in the Bradford district, no extraction is currently taking place. On this basis, and given	Yorkshire and Humber Assembly

<p>the pressing shortfall of sand & gravel supplies in West Yorkshire, the Core Strategy will need to refer to the outcomes of the regional Sand & Gravel Study (Phase 2). This Study is intended to be complete by the end of 2007, and will offer regional guidance on a sustainable pattern of future extraction to meet the future economic needs of the region. The Assembly can also confirm that it intends to scope potential work on non aggregate minerals in 2007-8. This will include looking at the potential RSS role in providing specific guidance on energy, industrial and block/dimension stone.</p>	
<p>Extraction should not take place in locations where it would affect designated wildlife sites. Furthermore, the Core Strategy should ensure secondary aggregates are used wherever appropriate in the construction of new developments, to reflect policy ENV4 of the draft RSS. The restoration of minerals sites can provide rare opportunities to contribute to national and regional BAP targets. As stated in Minerals Planning Guidance 7: Reclamation of Mineral Workings, 'restored mineral workings have contributed the largest area of new wetland for nature conservation in <i>England....</i>' The RSPB has been funded through the Mineral Industry Research Organisation to deliver the <i>Minerals Restoration Potential Project</i>. This is a GIS analysis of what UK BAP priority habitats could be created on all existing minerals sites as part of their after-care. The study shows that national targets for a number of BAP priority habitats could be met or exceeded using minerals sites alone. A report on the project, '<i>Natural After Minerals</i>' is now available (http://www.rspb.org.uk/policy/planningpolicy/quarries.asp). To realise this potential it is essential that developers identify opportunities to create biodiversity at the design stage, and ring-fence funding to deliver these enhancements. In addition, schemes to create biodiversity should be carefully targeted to restore networks of BAP habitats, rather than as a way of utilising parts of the site unsuitable for other uses. We strongly encourage the Council to adopt robust policy to maximise the potential benefits to wildlife from minerals afteruse.</p>	<p>RSPB</p>
<p>Q 7.9 HOW SHOULD THE LDF DEAL WITH THE SUPPLY OF BLOCKSTONE?</p>	
<p>In line with the guidance in Annex 3 of MPSI, the policy should also provide an appropriate framework for the identification and protection of both existing and formally worked sites which</p>	<p>English Heritage</p>

<p>have (or could) provide material for the repair of historic buildings and structures within the area. This could be delivered through and SPD. English Heritage would welcome further discussions with the authority on this issue if you so wish.</p>	
<p>Bullet 1 <i>Lobbying the Yorkshire and Humber Region to undertake surveys to obtain factual information on blockstone, reserves, supply and demand.</i></p>	<p>Ilkley Parish Council</p>

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