Local Plan for the Bradford District

Core Strategy

Planning Response to the Health Impact Assessment of the Core Strategy Further Engagement Draft

February 2014

Planning Response Document to the Health Impact Assessment of Core Strategy Further Engagement Draft

1.0.   Introduction

1.1.   The Health Impact Assessment (HIA) on the Core Strategy Further Engagement Draft (CSFED) was produced by the Public Health Department of the City of Bradford Metropolitan District Council, although the process was commenced prior to the transfer of the Public Health function from the NHS to Local Authority.

1.2.   It set out 10 proposed inclusions that were to be considered in the production of the Core Strategy Publication Draft (CSPD). (These are shown in bold text in Section 4 below.)

1.3.   Each of these inclusions is considered in this Response Document.

1.4.   This document is to be read alongside the Health Impact Assessment of the CSFED and the CSPD.
The HIA; other appraisals and assessments; the issues raised in representations made to the CSFED; and the issue of the National Planning Policy Framework, have all contributed to, and help produce the CSPD.

1.5.   This response document records how the 10 proposed inclusions of the HIA have influenced the CSPD.

1.6.   The Core Strategy is a key part of the Development Plan which sets out the vision, objectives and strategic policies to guide the pattern and levels of development within the District to 2030.

2.0.   The Health Impact Assessment of the Core Strategy Further Engagement Draft

2.1   The purpose of HIA was to take the CSFED and assess the likely impact on health and wellbeing that implementation of the CSFED may have on the people of Bradford District.

2.2   Section 2 provided a summary of the key public health documents which are considered the 'drivers' of public health practice.

2.3   Section 3 explained in detail the Health Impact Assessment process. It took a two-pronged approach – firstly to screen and scope the proposals within the document (Section 4 and 5 respectively) and secondly to assess gaps within the document to recognise any opportunities that may have been missed (Sections 6 and 7). By so doing, the assessment proposes inclusions to the CSPD (Section 8) that may enhance the future health benefits for the population.

3.0. Scope of the Response Document

3.1. Overall the HIA notes that 'the impact of the Core Strategy should positively contribute towards the future health of the District.'

3.2. This response document records how the 10 proposed inclusions of the HIA have influenced the CSPD.

3.3. The topic areas considered by the ten proposed inclusions are:

> Air Quality
> Noise
> Green Belt
> Phasing of development
> Secured by Design standards
> Children's Play Areas
> Public transport
> Active Travel options
> Future Proofing
> Infrastructure for Tourists and Students

The planning response for each inclusion has its own table in Section 4.0.

3.4. In the section 7 of the HIA there are Amber RAG rated recommendations that were not relevant to the CSFED but should be picked up elsewhere in the planning process. They have not been considered in this document, but will be considered where appropriate in the Allocations and Area Action Plan DPD.

4.0. Response to the 10 proposed inclusions

PROPOSED INCLUSION 1: AIR QUALITY
The CSPD should explicitly address the impact some of the Strategic Core Policies and Thematic Policies may have on air pollution. Whilst air quality is mentioned frequently in the CSFED, and the impact on health and wellbeing is noted, little detail is given about how deteriorations in air quality will be avoided. It is recognised the detailed policy may fall outwith the CSPD, however greater reference to the Air Quality Management Plans may be warranted with specific examples of how they will be complied with under specific Strategic Core Policies.

PLANNING RESPONSE
The HIA would like the CSPD Strategic Core Policies to address the impact of policies on air pollution and how deteriorations in air quality would be avoided. It would like to see a greater reference to Air Quality Management Plans and examples of how they would be complied with.

Many of the air quality problems in the Bradford District are linked to transport. The bottom of river valleys and basins trap pollution from transport. The scale of development proposed will have a significant impact on the districts air quality

Air quality is therefore a matter recognised in the CSPD, particularly in policy EN8.

The existence of Green Infrastructure can help to mitigate poor air quality.

The Air Quality Strategy and Low Emissions Strategy (LES) set out the how the Council will address air quality issues. It is not appropriate to duplicate the strategies or implementation plans within the CSPD. |

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
EN8	Here the section on air quality states the Council will take a proactive approach to maintaining and improving air quality. Through a range of actions, it will seek to secure a reduction in emissions from sources which contribute to poor air quality. Development proposals that have the potential to adversely impact on air quality will be required to incorporate measures to mitigate or offset their emissions and impacts, in accordance with the Low Emission Strategy for Bradford and associated guidance documents. The policy states development proposals must have measures that accord to the LES.

SC2A6:Climate Change and Resource use	The aim is to improve air quality and reduce road transport emissions.
TR6J	This policy supports measures to reduce the adverse impact of freight movements on air quality by transferring freight from road to rail. It encourages the use of low emissions vehicles and looks to the introduction of Low Emissions Zones where appropriate. There are plans to work with other authorities to develop a West Yorkshire Low Emissions Strategy.
SC6: Green Infrastructure	The existence of Green Infrastructure can help to mitigate poor air quality. Identifying GI assets can improve and protect essential natural capital; including soils, air quality and critical water resources. SC6 Green Infrastructure supports and encourages the maintenance, enhancement and extension of Green Infrastructure in order to encourage healthy living and sustainable transport. Further work to define Green Infrastructure will be carried out through the preparation of the other Local Plan documents.
AREA ACTION PLANS	
These recognise air quality as a constraint to development, which will need to be overcome through enhancements to sustainable travel options.	
POLICIES AND STRATEGIES OUTSIDE PLANNING'S CORE STRATEGY	
Low Emissions Strategy	The Bradford LES was adopted by Council's Executive on 5th Nov 2013. This strategy is to be monitored by the Health & Wellbeing Board. It describes the impact of poor air quality on health and the environment and outlines the progress that the Council has made in modifying its own policies and practices to encourage and facilitate vehicle emission reductions. It also looks at ways in which partnership working with other public authorities and the private sector can be improved and strengthened to achieve shared goals. As part of this strategy there is a Planning Policy in Section 8 which looks at air quality mitigation on every scheme. While this planning policy cannot solve immediate air quality issues, it has a role to play so that any likely scheme impacts are reasonably mitigated and future scheme occupants are able to make green vehicle choices. LES: Planning Policy Section 8; • Introduces air quality mitigation as a part of good scheme design with a focus on providing cost effective low emission infrastructure and other

	measures such as travel planning. • Tackles the issue of cumulative impact Gives clarity and consistency to the process to the benefits of planning colleagues and developers • Can facilitate the unlocking of difficult sites (in air quality terms) making them suitable for development An example of the strategies implementation is that, where practical, every new house built will have an electric vehicle charging point installed. Bradford Council will use National Air Quality Standards, European Union Limit Values and principles of best practice to monitor Air Quality. Development proposals that adversely impact on air quality will be required to incorporate measures to mitigate or offset their emissions and impacts. This will be done in line with the Low Emissions Strategy and associated guidance.
Air Quality Management Areas (AQMA)	The Council has a statutory duty to designate Air Quality Management Areas (AQMA), which it used in Sept 2006. There are four in the District. These are located on relatively small areas. Rather than only concentrating on the Air Quality Management Areas, air quality was looked at across the Bradford District in the Low Emissions Strategy.
Air Quality Action Plan	This takes account of the contributory factors leading to the exceedence of the air quality objective and any limitations in Bradford Council's ability to act on this issue. The AQAP recognises that District wide policies are required to secure improvements in air quality in the identified AQMAs. Due to this the Low Emissions Strategy was produced in order to cover the whole of the District.

SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION
Improvements to air quality are promoted through policy EN8.   **Other organisations and strategies also have an important role to play, particularly the LES.**   **It is not appropriate to duplicate these other strategies in the CSPD.**

PROPOSED INCLUSION 2: NOISE
The CSPD should similarly address the impact the CSPD will have in terms of noise pollution. Clearly many of the Strategic Core Policies and Thematic Policies are likely to entail considerable levels of noise pollution during implementation. Only minor reference is made to this within the document, despite it forming part of national guidance. Whilst it may be implicit within the CSFED that due regard will be taken to minimise noise disturbance it should be made more explicit within the CSPD.

PLANNING RESPONSE
HIA states that CSFED only gives minor reference to Noise and that it should be more explicit in the CSPD. Noise has been added in to Policy EN8. Traffic noise is generated during developments construction phase. Excess traffic noise is subject to its own legislation mitigation arrangements and is outside of the scope of this document The HIA statement, "However this can be offset in the longer term by the development of road routes that do not impact on communities" is unlikely to be achievable due to environmental and physical constraints

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
EN8	Policy EN8 Environmental Protection states that proposals that are likely to result in exposure to noise pollution will only be permitted if measures can be implemented to minimise that noise pollution to a level that provides a high standard of protection for health. Section C in this policy states that proposals must identify potential noise nuisance issues arising from the nature of the proposal and address impacts on that development from existing land uses. In the supporting text in the EN8 Environmental Protection policy it now recognises that nuisance issues such as noise can have a significant impact on health and it states that every effort must be made to ensure nuisance problems are not to be generated during construction or operation.
EN1, DS5	Noise is also included in the supporting text around Local Green Space and in the Design policy DS5

DEVELOPMENT MANAGEMENT
Where appropriate, Planning Permission can be granted subject to a condition that restricts the times of construction, of a development, to minimise any noise nuisance to residents of the development and surrou8nding property.

SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION
Noise has been included in policy EN8.   **It is more appropriate to consider construction noise through the development management process.**

PROPOSED INCLUSION 3: GREEN BELT
The use of Green Belt land for development purposes will always be controversial. It is recognised that there is a balance between providing affordable and modern housing and using Greenfield sites. Any proposed developments on Green Belt should be assessed rigorously, and should include an individual HIA. Any loss of green belt land would be unfortunate, but could be mitigated through improving access to green space at a local level and improving the use of green belt and green space more generally for physical activity as well as improving mental health.

PLANNING RESPONSE
The concern in the Health Impact Assessment relates to any proposed loss of Green Belt rather than the existence of a policy to protect Green Belt.   It mentions that any proposed loss could be mitigated by improving access to local green space. The HIA suggests that any proposed developments on Green Belt should be assessed rigorously, and should include an individual HIA. It is one of the Strategic Objectives of the CSPD to provide accessible and varied opportunities for leisure and recreation including access to the countryside and the utilisation of green infrastructure spaces and routes for walking and cycling. The HIA also states that any loss of green belt land would be unfortunate, but could be mitigated through improving access to green space at a local level and improving the use of green belt and green space more generally for physical activity as well as improving mental health. The CSPD cannot meet the development needs of the Bradford District without development in the Green Belt. However, as is demonstrated in the following paragraphs Green Belt releases are not the first to be considered The HIA mentions Greenfield and Green Belt as interchangeable designations. They are two different terms with different meanings and applications. Previously Developed Land can exist in the Green Belt and greenfield land can exist outside the Green Belt. In the HIA proposed inclusion it refers to any loss being unfortunate and therefore implies that all Green Belt land has health benefits. Some Green Belt land is highly valued in terms of landscape and environmental quality but other areas can be degraded and derelict. Improving access to green space at a local level is outside the scope of the CSPD. Improving access to Green Belt itself is outside the scope of the CSPD and it can depend on the use of land and the landowner's intentions and priorities. If new development is proposed within Green Belt, Green Infrastructure policies can be used to encourage developers to improve access to the open

	countryside. The Rights of Way network provides access to and through green spaces within the District. Further work to define Green Infrastructure, and access to it, will be carried out through the preparation of the Allocations DPD, Area Action Plans and the Local Infrastructure Plan. Locations for development will be identified that offer opportunities to enhance Green Infrastructure and principles for design will be set out to deliver this.
POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
SC7: GREEN BELT	The policy has been amended from the CSFED to clarify the release of land from the Green Belt. Green belt is also defined in the Glossary of Terms. The selective review of the Green Belt will be undertaken in the Allocations DPD, where policies, proposals statements and a policies map will define the extent of the Green Belt. It is suggested that it will be more appropriate for a HIA to be carried out on the Allocations DPD itself, and on settlements and individual sites where appropriate.
SECTION 5.3 : HOUSING	In Section 5.3 Housing it is recognised that some Green Belt will need to be developed to make the best use of urban land in order to protect valued Green Infrastructure, spaces and habitats. Also in this section it states that land designated as Safeguarded Land in the Replacement Unitary Development Plan will need to be developed in order to minimise the need for Green Belt losses
Policy H02	Policy HO2 Strategic Sources of Housing Supply states that local Green Belt releases will provide sources of Housing Supply where they are consistent with the plans sustainability principles and where other sources of supply have proved insufficient within the relevant settlement or strategic planning sub area. Policy HO2 demonstrates that the District faces a major challenge in finding sufficient land to meet the housing needs of a growing population. The HIA states that having a suitable home has positive impacts on health but due to the scale of development needed in the District realises there are conflicting issues related to the loss of Green belt land.

Policy H07 E	In HO7, which sets out principles for identifying, assessing, comparing and allocating sites, point E is 'minimising the use of Green Belt land within the plan area. The opportunities to use brownfield land, thereby relieving or reducing the amount of development which is required on greenfield or Green Belt locations is a key factor when deciding on sites to allocate.
Policy EN1 C	Under Policy EN1 C,(Protection and improvements in provision of Open Space and Recreation Facilities), when identifying land for development involves the release of Greenfield or green belt land, identified deficiencies in recreation open space within the local area will need to be addressed, in addition to meeting the needs of future residents. Green Infrastructure, recreation facilities and open space, including playing pitches and natural green space, to meet existing and future needs will be identified in other Local Plan documents. In terms of Local Green Space the Council will work with local communities to identify areas of Local Green Space in the Local plan and any Neighbourhood Plans. Local Green Space which is valued for amenity, recreation and wildlife or contributes towards character, distinctiveness and visual quality will be protected from development, other than in very special circumstances which are supported by the local community.
SCP6: GREEN INFRASTRUCTURE	Strategic Core policy 6 on Green Infrastructure in section A states planning decisions as well as plans, policies, strategies and investment decisions will support and encourage the maintenance, enhancement and extension of networks of multi-functional spaces, routes and key areas of Green Infrastructure, as an integral part of the urban fabric and to improve urban and rural connectivity. This policy also states that green spaces and corridors which can be assessed as making a significant contribution towards the following criteria, amongst others, will be protected. Important attributes of natural green space, connectivity to other green spaces and a local need for open space • Valued landscapes and local distinctiveness and

	amenity, particularly within the urban core • Improving opportunities for walking, cycling and horse riding, establishing strategic green links and enhancing the rights of way network in urban and rural parts of the district Further work to define Green Infrastructure will be carried out through the preparation of the other Local Plan documents. Locations for development will be identified that offer opportunities to enhance Green Infrastructure and principles for design will be set out to deliver this.
ALLOCATIONS DEVELOPMENT PLAN DOCUMENT	
As part of producing the Allocations DPD the council will engage with all stakeholders in assessing the range of development sites options that are achievable and will continue to look for alternatives which would avoid or reduce Green Belt releases.	
AREA ACTION PLANS	
The Council are currently progressing the development of two AAP DPDs which will make a significant contribution to meeting housing need, securing regeneration and reducing the need for land in Greenfield and Green Belt locations.	
SUMMARY PLANNING RESPONSETO THE PROPOSED INCLUSION	
A selective review of the Green Belt will be undertaken in the Allocations DPD **It is more appropriate to undertake an HIA of the Allocations DPD itself, and on settlements and individual sites where appropriate.**	

PROPOSED INCLUSION 4: PHASING
It is important to recognise the impact developments can have on the mental and physical health of the population – not just in terms of noise and pollution but through the impact on mental health through, for example, increased commute time due to road closures. Completing the developments suggested within the CSFED in phases could mitigate disruption to daily life, but equally it is recognised that individual developments (as opposed to the implementation of all developments at the same time) may be better completed quickly and in one go. It is suggested that clarity on pace of implementation is brought to the CSPD, ensuring individual developments are completed quickly once started whilst at the same time ensuring developments as a whole across the District are phased.

PLANNING RESPONSE
The 'proposed inclusion' wording appears to start from the assumption that all development and all programmes for investments, change, infrastructure improvement will occur instantaneously at the start of the plan period. This is not the case as the CSPD identifies the development needs of the District up to 2030, and investment decisions will be made throughout this period

Policies EC3 and HO3 identify the requirement, and broad distribution, of employment and housing land allocations, respectively, over the plan period. Policy HO4 phases the release of housing sites into two periods.

Detailed proposals for the allocation of sites within these phases and the trigger mechanisms for releasing land will be set out in the Allocations, Bradford City Centre and Shipley & Canal Road DPDs.

Investment decisions would usually seek to complete individual developments as quickly as possible, but this matter is outside the scope of the CSPD. |

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
HO4	Policy HO4 documents the need for, and the details of, the phased release of housing sites, which will be set out in the Development Plan Document's, (DPDs). If justified, any proposed phasing of non residential development would also be proposed in the DPD's.
TR3 Public transport, Cycling and Walking.	Phasing is also included under this policy. It states that accessibility standards (in Appendix 3) along with key transport networks will be used to guide the allocation and phasing of development sites. The Appendix includes how far that employment, social infrastructure, housing and mixed use development should be from public transport of a certain service frequency.

SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION

The nature of the Plan and investment decisions will mean that developments are not built all at the same time.

Investment decisions would usually seek to complete individual developments as quickly as possible, but this matter is outside the scope of the CSPD.

Housing sites are subject to phasing through Policy H04 and other DPD's will apply the policy and identify the phasing of individual sites.

PROPOSED INCLUSION 5: SECURED BY DESIGN
No specific mention is made of Secured by Design, although principles of developing safe neighbourhoods that reduce crime and the fear of crime are mentioned in Implementation and Delivery Policy ID2. Fear of crime is a significant cause of social isolation, particularly in older communities. Consideration should be given to the principles of Secured by Design. A statement within the CSPD alluding to the intention to comply with the principles may be justified.

PLANNING RESPONSE
The HIA would like to see a statement that the CSPD would comply with the principles of Secured by Design. It mentions the fear of crime as a significant cause of social isolation and links it to Policy ID2

Secured by Design is currently subject to the Government's review of housing standards. This may see it incorporated into a more generic set of standards or possibly become part of building regulations. Therefore it is considered inappropriate to refer specifically to Secured by Design in the Core Strategy as it may not exist in its current form in the near future.

Policy ID2, on Development Management, in the CSFED has been deleted and replaced by a policy related to development viability in the CSPD.

New design policies have been added as DS1 - DS5.
Whilst secured by design is a useful principal, caution should be applied where 'secured by design' results in impermeable developments that discourage the use of active and sustainable travel. |

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
DS5: Safe and Excusive Spaces	It states that plans and development proposals should be designed to ensure a safe and secure environment and reduce the opportunities for crime. It also includes a requirement to encourage social interaction and where appropriate provide opportunities for members of the community to meet and come into contact with each other. This could help to reduce social isolation. The supporting text, paragraph 5.3.286, states that advice on designing out crime should be sought at the earliest stage of a project from the Bradford District Police Architectural Liaison Officer.
Planning for Crime Prevention Supplementary Planning Document	This provides detailed design guidance. This document is based on Secured by Design principles and was developed in partnership with West Yorkshire Police Architectural Liaison Officers. It is intended that it will be retained as a supplementary document in support of Policy DS5 in the CSPD.

SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION

It is not appropriate to place particular emphasis on Secured By Design.

New Design Policies in the CSPD are based on the same principles as Secured by Design.

The Planning for Crime Prevention SPD provides detailed design guidance and was developed with West Yorkshire Police.

PROPOSED INCLUSION 6: PLAY AREAS
No specific plans for the provision of play areas have been identified within the document. Whilst green space provides play space, it is a mixed-use mixed-age provision. Providing dedicated space and facilities for young children is important for their early year's development, both physically and mentally. It is also a more protected and safe area. Consideration should be given to including this in the CSPD.
PLANNING RESPONSE
The HIA states that no specific plans for dedicated space and facilities for young children's play provision have been identified within the document. The CSPD does not include specific land use allocations. Policy EN1 relates to the provision of recreation open space. The Bradford Open Space, Sport & Recreation Study undertook an Assessment of Outdoor Sports Facilities in July 2006. A review has started on this document which will be in two stages. The first being the Playing Pitch Strategy followed by Open Space. Once needs have been prioritised, and identified in the strategy, outputs will feed into other DPD's and local infrastructure planning.

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
EN1A	Provision for children is included in this policy. Recreational Open Space will therefore be protected from development unless any of the exceptions in Policy EN1 apply. The exceptions include; 'unless alternative or better provision is part of the proposal'; 'the loss doesn't lead to a deficiency' or 'the site is unsuitable to meet any other local deficiency.' EN1C also states that when identifying land for development involves the release of green field or green belt land, identified deficiencies in recreation open space within the local area will need to be addressed.
HO7	HO7 Housing Site Allocation Principles, may provide a way, on larger schemes, to integrate improvements to community facilities or provide improvements to play areas and open spaces.

SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION
The allocation of play space for young children is outside the scope of the CSPD. When a justified need has been identified in the review of the Open Space study, this will feed into other DPD's and the Local Infrastructure Plan.

PROPOSED INCLUSION 7: PUBLIC TRANSPORT
No explicit reference is made to ensuring provision of public transport options are available to isolated geographical communities and communities of need at times when they are needed. This could be made more explicit, even if work has not been undertaken to establish when the times of need are yet and even though the actual provision of services falls beyond the scope of the CSPD.

PLANNING RESPONSE
It is one of the aims of the CSPD to improve public transport to more isolated communities. The Spatial Vision for the District, which is describing the District in 2030, states that public transport connections have been improved within the district with particular regard to rural towns, villages and outer suburbs, making it easier for people to access essential services. Policies around other forms of public transport e.g. car clubs, community transport, car share schemes have also been enhanced through amended Transport Management policies The HIA acknowledges the prior requirement to establish need, and that service provision is outside the scope of the CSPD. Public transport operators make the decisions about the provision of services in these areas and one consideration can reflect local needs.

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
TR5	TR5 , Improving connectivity and accessibility, promotes support for improvements to transport provision in the more isolated and poorly serviced areas of the district, which include: TR5A- The development of sustainable transport solutions in isolated areas to facilitate access to services; TR5C - Seek to co-ordinate service and transport provision to isolated areas and communities; and TR5D, encourage the development of partnerships to deliver sustainable transport solutions. In the supporting text, to TR5, it states that many transport related issues are common to all parts of the District. However, there are particular challenges that are unique to areas that are poorly served by public transport. The isolation felt by those communities, particularly those without access to a car, can lead to the complex problems of social exclusion and disadvantage. When addressing accessibility and connectivity issues it is essential that the needs of all groups of society are taken into consideration.
SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION	
Policy TR5 relates to access to rural and isolated communities for new developments. **Establishing times of need and actual provision falls outside the scope of the CSPD**	

PROPOSED INCLUSION 8: ACTIVE TRAVEL	
Whilst the provision of active travel options is mentioned in Thematic Policies TR1, TR3 and TR4, this is not in regard to new developments. Consideration should be given to maximising active travel (cycling and walking) opportunities in new developments as well as improving and maintaining existing opportunities and a statement to this effect within the CSPD would be welcomed.	
PLANNING RESPONSE	
The HIA states consideration should be given to maximising active travel opportunities in new developments as well as improving and maintaining existing opportunities. Revisions made to the policies on active travel have addressed these points. The policies around walking and cycling have been strengthened and enhanced giving regard to new developments. Actual improvements and maintenance of active travel routes would be outside the scope of the CSPD.	
POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
TR1E	This policy states that appropriate facilities for active travel modes at new development will be included to reduce the demand for travel.
TR3F	TR3 Public Transport, Cycling and Walking looks at safeguarding walking and cycling infrastructure and services through accessibility standards. Section F requires that the layout of new development encourages walking and cycling by providing a permeable network of routes.
TR4C	This policy states the new tourist, cultural and leisure facilities should be accompanied by a Transport Assessment and approved Travel Plan to provide the means and incentives for visitors to travel to the site by modes other than the private car.
TR4D	This policy acknowledges the contribution of, and support the maintenance and development of, 'transport based' leisure attractions including, amongst others towpaths, cycle and walking trails and bridleways. It seeks to protect opportunities for the development of such facilities e.g. disused railway lines, especially where these can contribute to high quality local routes.
SCP2B2 : Climate Change & Resource Use	The Council's carbon reduction targets will be supported by locating new developments where it will support opportunities for the delivery of renewable and low carbon energy, green infrastructure and improvements to public transport and facilities for walking and cycling.

OTHER POLICIES AND STRATEGIES OUTSIDE THE CSPD
A cycle infrastructure plan is being developed for the district including the city centre. Improvements to footpaths are included in the Rights of Way Improvement Plan.
SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION
Revisions have been made to the policies on active travel to encouraging active travel options in new developments. **Actual improvements and maintenance of active travel routes would be outside the scope of the CSPD.**

PROPOSED INCLUSION 9: FUTURE PROOFING
All new buildings for commercial use should be adaptable to take account of changing market trends and uses. This is not specifically mentioned within the CSFED. Consideration should be given to the insertion of a statement within the document to this effect, recognising the importance of future proofing developments.

PLANNING RESPONSE
The HIA states that the CSPD should consider a statement about building new commercial building so they can be adaptable for future uses. An additional Core Policy has been added to the CSPD, on Making Great Places, together with a suite of Design Policies, one of which promotes Safe and Inclusive Places.

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
SC9	SC9 Making Great Places promotes, at point 5 designing places which can adapt to changing circumstances and needs, and which will function well over the long term.
DS5B	DS5B safe and Inclusive Places promotes, at point B, high quality, inclusive design, through flexibility to adapt to changing needs and circumstances. It recognises that successful buildings are those which can respond to changing social, technological or economic conditions. Developments are encouraged to promote adaptability, in particular, through flexible layouts and design. Flexible buildings and places should be capable of being used for a range of activities or possible future uses and allow occupiers the opportunity to modify them to meet their own requirements over time.

SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION
Policies have been added to the CSPD to promote the future proofing of buildings.

PROPOSED INCLUSION 10: INFRASTRUCTURE
The increased demand for infrastructure and service provision that new academic and student accommodation and improved visitor offer will create should be taken into account, especially as failure to meet demand can result in poor-quality service provision not only for visitors/tourists and students/academics but also existing residents. Furthermore this encourages the development of new employment opportunities. Whilst this is covered in terms of transport infrastructure by Thematic Policy TR4, further consideration of hotel and overnight accommodation provision is required. This is not covered within the document, either with regard to tourism (which is within the scope of this document) and academia (which may be beyond the scope of the CSFED/CSPD). Additional focus on the impact on other infrastructure such as retail outlets and health care facilities may also be warranted.

PLANNING RESPONSE
The HIA considers that hotel and overnight accommodation provision along with other related infrastructure is needed to take account for the increased demand that students and tourists bring to the District. This demand for services will also create new job opportunities. Although the CSPD contains policies that will help achieve this aim the provision of infrastructure is outside the scope of the CSPD and will be dealt with in the Local Infrastructure Plan. (LIP) The Council has demonstrated partnership working with infrastructure delivery partners, through the preparation of the LIP, which sets out how the Core Strategy will be supported by appropriate infrastructure. The Core Strategy is a spatial plan and the implementation of objectives and policies cannot be carried out by the Council alone but will rely on coordination with a range of public, private and voluntary organisations. In order to achieve the objectives of the Core Strategy commitment will be needed from these organisations, which may be required to take action directly or work in partnership with the Council. The allocations DPD or AAPs would not normally provide sites specifically for hotels, overnight accommodation, retail outlets or health care facilities, although may well identify areas within which leisure, commercial or community facilities would be appropriate.

POLICIES WITHIN THE CORE STRATEGY PUBLICATION DRAFT	
TR4C	In this policy any new tourist, cultural or leisure attraction will need to be located in accordance with the accessibility standards set out in Appendix 3 of the CSPD.
ID4 & ID5	These policies seek to ensure vital infrastructure is planned and delivered through effective partnerships to support development throughout the District; in particular to support growth identified in this Core Strategy and to target areas with infrastructure deficiencies.

EC1J &EC4E&F	These policies address the development of new employment opportunities related to Higher Education and Tourism.

LOCAL INFRASTRUCTURE PLAN (LIP)
The LIP identifies gaps in infrastructure to serve the Districts existing population and sets out future infrastructure needs as a result of developments arising from the Core Strategy. The preparation of this LIP has involved working with both internal and external partners to identify the specific infrastructure projects to be delivered, focusing on a range of social, physical, environmental and green infrastructure. The Infrastructure Delivery Schedule is set out in the Local Infrastructure Plan to identify what new or improved infrastructure is planned, who will be involved and the resource implications. This will be monitored and reviewed as necessary. The LIP promotes investments in infrastructure but identifying size, scale and location of specific infrastructure falls outside the scope of the LIP. The LIP supports development of all the associated infrastructure provisions to meet the growing needs and demands from students, tourists and visitors. This will be reflected through the emerging Area Actions Plans and the Allocations DPD. Provision of healthcare facilities is explicitly covered within the LIP which has informed the development of relevant CS policies. The LIP recognises health as a critical infrastructure issue for the District and has outlined sub-area specific recommendations to help plan, fund and deliver any identified gaps in healthcare provisions including primary and acute care.

ALLOCATIONS DEVELOPMENT PLAN DOCUMENT AREA ACTION PLANS
Areas within which leisure, commercial or community facilities would be appropriate, could be identified within the Allocations DPD and AAPs.
SUMMARY PLANNING RESPONSE TO THE PROPOSED INCLUSION
Although the CSPD contains policies that will help achieve this aim it is more appropriate that the provision of infrastructure is dealt with in the Local Infrastructure Plan (LIP) and through policy areas in other DPD's. Provision of healthcare facilities is explicitly covered within the LIP

5. Conclusion.

    5.1   The HIA has played a vital and valuable role in assessing the likely, positive and negative, impacts on health and well being of the CSFED, and promoting inclusions in the CSPD that may enhance the future health benefits for the population of the District.

    5.2   Being a strategic document, the CSPD is not always the appropriate part of the Local Plan to address the issues raised in the 10 proposed inclusions. This document identifies how these matters have been addressed in the CSPD, and where this is not been appropriate, notes how the other DPD's and LIP will promote them.

    5.3   This document will be referred to Public Health for their consideration and comment.