



**Local Plan for the Bradford District**

**Core Strategy Development Plan Document**

**Sustainability Appraisal (Incorporating Strategic  
Environmental Assessment) Adoption Statement**

**July 2017**

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## 1. Introduction

### This Document and the Sustainability Appraisal Process

- 1.1. The Core Strategy Development Plan Document forms part of the Local Plan for the Bradford District and was adopted by Full Council on 18th July 2017.
- 1.2. Legislation requires that Sustainability Appraisals are carried out as an integral part of the preparation of new plans. The Government's National Planning Policy Framework (NPPF) confirms that in meeting this requirement a Sustainability Appraisal should incorporate the requirements of the European Directive on Strategic Environmental Assessment. The Strategic Environmental Assessment (European Directive 2001/42/EC) requires that local planning authorities undertake an 'environmental assessment' of any plans they prepare that are likely to have a significant effect upon the environment.
- 1.3. This Sustainability Appraisal Adoption Statement has been produced in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004, and as a result includes:
  - i) how sustainability, and in particular environmental considerations have been integrated into the Plan;
  - ii) how the sustainability appraisal / environmental report has been taken into account;
  - iii) how opinions expressed in response to the consultations on the draft plan and sustainability appraisal / environmental report have been taken into account;
  - iv) how the results of any consultations involving other Member States have been taken into account
  - v) the reasons for choosing the Plan as adopted, in the light of other reasonable alternatives dealt with; and
  - vi) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan.

### The Core Strategy for the Bradford District

- 1.4. The City of Bradford Metropolitan District Council is currently in the process of preparing a new Local Plan to guide future growth and development in the District see <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/planning-policy/>

- 1.5. The new Local plan will replace the existing Replacement Unitary Development Plan for Bradford (RUDP), adopted in October 2005.
- 1.6. The Core Strategy, the strategic part of the new Local Plan, does not identify or allocate any sites for development. This is the role of other Development Plan Documents (DPD's) being prepared which include the Bradford City Centre Area Action Plan, the Shipley and Canal Road Corridor Area Action Plan, Waste Management DPD and the Site Allocations DPD. Each of those DPD's are subject to their own Sustainability Appraisals.
- 1.7. The Core Strategy does however:
  - Set out the broad aims and objectives for sustainable development in the District for the period up to 2030;
  - Set out broad policies for steering and shaping development;
  - Establishes the level of need and therefore land required to meet the District's needs for homes, jobs and infrastructure;
  - Set out policies to manage growth in a sustainable way and including policies to protect and conserve key aspects of the built, natural and cultural environment;
  - Gives guidance and direction for the production of site allocating DPD's.
- 1.8. The Vision and Strategic Objectives of the Core Strategy are to be realised by application of a range of policies which include:
  - A presumption in favour of sustainable development
  - Strategic Core Policies dealing with key spatial priorities, climate change, working with stakeholders, the settlement hierarchy, location of development, green infrastructure, green belt, protecting the South Pennine Moors and their zone of influence, and making great places;
  - Subarea policies for the Regional City, Airedale, Wharfedale and the South Penning Towns and Villages;
  - Thematic policies dealing with the economy, transport, housing, the environment, minerals, waste management, design, and implementation / delivery.
- 1.9. The Core Strategy has been produced over an extended period of time and has involved multiple stages of consultation and engagement. The key stages were:
  - Issues and Options in January 2007
  - Further Issues and Options in February 2008
  - Core Strategy Further Engagement Draft – October 2011

- Core Strategy Publication Draft – February 2014
- Examination – including hearings held in March 2015 and May 2016
- Consultation on Main Modifications to the Publication Draft – November 2015
- Adoption – July 2017

## **2. How sustainability and in particular environmental considerations have been integrated into the Plan**

- 2.1. Sustainability and environmental considerations lie at the heart of the Plan and are built into its content at all levels from its Vision and Objectives, through its Strategic Core Policies and through to its thematic policies.
- 2.2. The Core Strategy reflects the key issues and challenges facing the District and the nature of the area, its population, its culture, history and environment. Bradford District is a large metropolitan authority covering both extensive urban areas forming part of the wider Leeds City Region and extensive rural areas on the Pennine fringes. It has a rapidly expanding population and therefore faces challenges in accommodating growth, reducing inequality and securing regeneration and has a rich built and natural environment which reflects its industrial past. The District has a varied topography and contains many assets designated for their historic and ecological value. Retaining, conserving and enhancing these environmental assets is considered essential not only for the value of those assets but also the role they play in improving the quality of life of the District's residents, maintaining health and well-being, and in supporting economic growth and in particular leisure and tourism.
- 2.3. The Core Strategy therefore seeks to plan for growth and regeneration whilst giving priority to sustainable development through the broad choices it makes about the locations and spatial distribution of growth, the design of development, the inclusion of policies which highlight and protect key environmental assets and policies which seek to ensure that appropriate mitigation is secured to minimise any adverse effects of development.
- 2.4. Sustainability and environmental considerations are built into all of the different sections of the plan:
  - The Plan's Spatial Vision encourages sustainable lifestyle choices, and indicates that sustainable development and management should be at the heart economic and social transformation. It highlights the District's unique landscapes, heritage and biodiversity assets and the need to respond to the challenge of climate change;
  - In addition to highlighting the need to provide for homes, jobs and infrastructure the Plan includes strategic objectives to safeguard and enhance the District's historic built and natural heritage, its biodiversity assets in particular the South Pennine Moors, and its natural and renewable energy resources;
  - The Plan's first and overarching policy relates to the presumption in favour of sustainable development;

- The Plan's Strategic Core Policies include ones which:
  - Protect the District's environmental resources, avoid increasing flood risk, promote sustainable patterns of development and a shift to sustainable forms of movement, and encourage high quality design (SC1)
  - Respond to climate change by increasing resilience, supporting the Council's carbon reduction targets, and by using resources sustainably (SC2);
  - Use a settlement hierarchy to focus development on the larger settlements and most sustainable locations (SC4);
  - Give priority to the location of development on previously developed land within settlements and requiring the selection of development sites to reflect accessibility and the use of sustainable travel modes such as public transport, walking and cycling;
  - Support the maintenance, enhancement and extension of green infrastructure;
  - Protect the South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC) (SC8);
- The Plan's Sub Area Policies which for each area set out key regeneration and growth priorities, explain the level of growth proposed and broadly how it will be accommodated, and set out key environmental assets and priorities, and key transport and infrastructure requirements;
- The Plan's thematic policies which in addition to covering development and growth cover,
  - Environmental policies relating to open spaces, bio and geo diversity, landscape, the historic environment, trees and woodlands, energy, flood risk and environmental protection (Policies EN1 to EN8)
  - Design including promoting good design (DS1), working with landscape (DS2), and urban character (DS3).

### **3. How sustainability appraisal has been taken into account**

- 3.1. As indicated above the preparation of the Plan occurred over a number of stages. Each stage involved carrying out Sustainability Appraisal (SA) which in turn involved the publication of a report highlighting key issues and recommendations.
- 3.2. Sustainability Appraisal was both vital and invaluable in highlighting the difficult choices which needed to be made in accommodating development and growth and highlighting areas where policies needed to be strengthened to ensure that subsequent choices to be made in the site allocating DPD's would where possible avoid adverse impacts on the environment and / or ensure mitigation measures were implemented.
- 3.3. The Sustainability Appraisal process and reports and the environmental issues highlighted helped inform the debate throughout the period of the Plan's preparation and during the independent examination process.
- 3.4. The different stages of the Plan's preparation and the SA reports produced are outlined below – further details are available on the Council's website at <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/>
- 3.5. Issues and Options 2007 – this was the start of the plan preparation process. A series of topic papers were published setting out the scope of the plan, key issues, the scale of development needed to meet future need, a draft spatial vision and objectives and principles such as a settlement hierarchy. Some very broad spatial strategy options with differing levels of dispersal of development were put forward but at this stage the Council had not developed the detailed policies determining housing and employment development quantum which were to appear in later stages. The accompanying Sustainability Appraisal report identified a number of Sustainability Appraisal Objectives which allowed the strengths and weaknesses of the different approaches to be highlighted. For example focusing development on the main urban areas had the potential to reduce the need to travel but conversely the more intensive nature of development could put pressure on green spaces and trees within urban areas and increase congestion. The options involving greater dispersal of development were thought to have the advantage of increasing housing choice and supporting services in smaller settlements but with the potential for impacts on landscape and habitats.



- 3.6. Further Issues & Options – January 2008 - having considered the representations received and in response to changes to the then Regional Spatial Strategy, the Council undertook further work to produce more refined and detailed spatial options. Having produced the initial Sustainability Appraisal ‘in house’, the Council appointed consultants Entec to carry out a further SA. Both these SA documents assisted the Council in assessing the different spatial options. The work carried out by Entec reviewed the scoping information and SA objectives produced by the Council in 2007 and, based on consultation responses received, defined 19 SA objectives which were then used to appraise the Further Issues and Options.
- 3.7. The key problems for the SA at the strategic stage of plan making were very evident. As the Plan does not identify sites the SA focuses on identifying potential issues which may occur dependent on the more specific choices to be made in subsequent DPD’s. Nonetheless the SA continued to highlight the challenges which would be posed whichever spatial option was chosen given the scale of growth and the potential need to release land from the green belt. The potential impact of approaches which focused development within Wharfedale, in particular on the South Pennine Moors SPA SAC were picked out but equally the social and economic benefits of development were highlighted.
- 3.8. Core Strategy Further Engagement Draft - 2011 – this was the first stage at which a full draft plan was published. Based on its consideration of the evidence, consultation responses and the issues raised in the SA / SEA reports the Council determined that a hybrid of the different spatial options should be pursued and also decided to provide a more detailed spatial breakdown of the development quantum proposed. This had the advantage of giving greater certainty over the approach to be taken, its potential impacts and the infrastructure and mitigation measures needed.
- 3.9. The accompanying SA / SEA report produced by consultants Amec (formerly Entec) concluded that the vast majority of relationships between the Plan’s elements and the SA objectives were positive or neutral. However, the negative impacts or key uncertainties raised related to the need to release green field and green belt land and the need to develop area specific policies and proposals via the development of Area Action Plans, SPD’s and development briefs was highlighted. Throughout the plan preparation process the Council has sought to examine its evidence base, particularly that relating to land supply and viability to secure a spatial distribution of development which maximises the use of previously developed land and minimises the need to release green belt. Notwithstanding these efforts, the issue of green field and green belt development was to be an ongoing theme and an area of public concern throughout the remaining stages of the Plan’s evolution.

- 3.10. Core Strategy Publication draft – February 2014 – the extended period between the Further Engagement Draft and the Publication Draft was largely the result of the need to carry out survey work within the 2.5km buffer zone around the South Pennine Moors SPA and SAC which in turn was prompted by the recommendations of the Habitats Regulations Assessment (HRA) Report of May 2013. The key issue was the role which the buffer zone played in supporting SPA species and thus the extent to which development might or might not result in direct or indirect adverse effects on the integrity of the SPA / SAC. The Core Strategy Publication Draft incorporated a number of key changes in particular to the distribution of housing development based on both updated evidence and the results of the HRA.
- 3.11. The Sustainability Appraisal of the Publication draft concluded that its policies would have positive effects on a number of SA objectives and highlighted the significant protection given to the South Pennine Moors SAC and SPA.
- 3.12. Core Strategy Main Modifications – in November 2015 the Council published for consultation a number of main modifications to the policies and content of the Publication Draft Plan. The modifications needed related to soundness issues raised by the Inspector and participants at the initial Examination hearings of March 2015, changes in national policy relating to affordable housing, the completion of a Gypsy and Traveller Accommodation Assessment, a revised Habitats Regulations Assessment and the completion of an update to the Strategic Housing Land Availability Assessment.
- 3.13. A Sustainability Appraisal Addendum report was produced which concluded that for 4 of the 17 key policy modifications the findings of the previous sustainability appraisal had not changed. Re-assessments were carried out in relation to the other policy modifications in particular those relating to an amended distribution of housing development which had slightly reduced housing quantum in the Regional City and the settlements of Baildon and Haworth and increased quantum in the Wharfedale settlements of Menston, Burley and Ilkley. The SA Addendum report indicated that its re-assessments of the amended policies had not led to significant changes in its conclusions from the previous SA as although some policies, in particular relating to housing distribution had been changed, the overall principle of those policies had not been altered.

#### **4. How the opinions expressed in response to relevant consultations on the draft Plan and the SA Reports have been taken into account**

4.1. As indicated in the sections above the Core Strategy has evolved and changed over an extended period and those changes have been influenced by a combination of the consultation and engagement carried out, the evolving evidence base, and the need to respond to significant issues raised by consultees most notably the correct approach to development and growth within areas in close proximity to the South Pennine Moors and the policies SC8 and EN2.

4.2. Throughout the evolution of the plan it is fair to say that there has been considerable public concern over the overall level of housing development proposed, its distribution and the need for development on green field and green belt land. However, the policies of Core Strategy have been found 'sound' following examination in part because those policies reflect the realities of the scale of housing need and the options for its distribution based on land supply but also because, as emphasised in the various SA reports, the Plan also contains policies to give priority to the development of previously developed land, and focus by far the largest proportion of development on the urban areas in support of their regeneration.

4.3. The Council has produced not only the Plan itself, but the evidence base needed to develop the Plan, in close co-operation with key consultees such as Historic England, Natural England and the Environment Agency. Both the SA and these organisations have offered views on options to amend and improve policies and examples of where this has made a significant difference to the Plan include,

- the reduction of housing targets in and around Saltaire, Haworth and Baildon where concerns were raised by potential heritage impacts by English Heritage / Historic England;
- improvements to Strategic Core Policies such as SC6 to reflect the priority to mitigate any adverse effects of increased recreation on the South Pennine Moors;
- the development in conjunction with Natural England of a revised HRA and amended policies to deal with the South Pennine Moors SPA / SAC;
- Changes to Policy HO7 which sets the principles by which housing sites will be assessed within the Allocations DPD and Area Action plans;

4.4. At each stage of the Plan preparation process the Council has produced reports outlining the scope of the engagement undertaken and the key issues raised and the Council's responses to the representations. All of these reports are available on the Council's website as is a useful summary of the consultation which is contained in Examination document SD/004 available here:

<https://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/?Folder=05%20Submission%20to%20the%20Secretary%20of%20State\1+Submission+documents>

- 4.5. This document reveals that in the two Issues and Options consultations there was strong support for options which focused development on the main urban areas, a desire to protect the green belt and areas of high landscape value. However, no one spatial option was overwhelmingly favoured. This however provided support for the Council's approach to at each stage test its spatial strategy and housing distribution to ensure that development within the District's higher order settlements is maximised and the need for green belt minimised while reflecting other key criteria and evidence such as land supply and viability.
- 4.6. At both these stages and later stages i.e. Further Engagement Draft and Publication Draft, concerns were raised by the public over the impacts of development on local infrastructure and fears about perceived flood risk. The Council were able to demonstrate to the Examination inspector that the spatial distribution chosen had sought to minimise potential flood risk having been informed by the production of a Strategic Flood Risk Assessment, by following the sequential approach, and through the inclusion of key policies such Policy EN7 relating to flood risk. All of this work had been carried out in consultation with the Environment Agency.
- 4.7. By the time the Core Strategy reached the Examination stage the concerns of the public over the scale and distribution of development and the issue of green belt and more specifically whether there were 'exceptional circumstances' which warranted the release of green belt land to meet development needs remained, as did concerns over infrastructure, environmental impacts and flood risk. However, the representatives of the development sector often held opposing views, arguing for a higher overall housing requirement and different distributions of development. Although a series of main modifications were judged to be needed to ensure that the Plan would be sound, the process of examination revealed that the Council had taken broadly the right approach in assessing and resolving all of these very different opinions.

## **5. How the results of any consultations involving other Member States have been taken into account**

- 5.1. There are no European trans-boundary issues associated with the Plan.

## **6. The reason for choosing the plan as adopted in the light of the other reasonable alternatives**

- 6.1. As outlined above the final Plan which the Council has produced and adopted reflects extensive consultation and engagement, reflects a large body of evidence and has been informed by the outputs of several Sustainability Appraisal reports which have integrated within them the requirements of the SEA Regulations. The Plan reflects the collection and analysis of a large quantity of environmental data covering among other things heritage, flood risk, and ecology.
- 6.2. The Plan and its policies have been chosen because they have maintained at its core the need to meet the needs of an expanding population in the most sustainable way by securing regeneration, focusing development on the main urban areas, and prioritising the use of previously developed land.
- 6.3. The Council has been able to demonstrate that there is no reasonable deliverable alternative which would both provide the development and change required and produce a lower requirement for the use of green field and green belt land. Evidence such as the HRA, the Strategic Flood Risk Assessment and the Bradford Growth Assessment has shown that the required development can be delivered in a sustainable way which avoids or minimises environmental impacts. An extensive suite of thematic policies have been set out and have been gradually amended through consultation. These policies will shape future DPD policies, site allocations and investment decisions in a positive way. Above all the Sustainability Appraisal process has shown that the chosen approach will have in most cases significant benefits particularly in meeting the social and economic needs of its present and future residents.

## **7. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan**

- 7.1. The Core Strategy will be subject to an on-going programme of monitoring as part of the Council's Annual Monitoring Reports. The Council are also working co-operatively with its neighbours and partners in the Leeds City Region to develop and improve intelligence, data and monitoring across a range of topics.
- 7.2. The Council's proposals for monitoring are clearly set out in the Core Strategy. Most policies are followed by a table which sets out the outcomes envisaged, the indicators which will be used to assess those outcomes and any relevant targets for those indicators. The bodies who will have lead roles in that monitoring and main mechanisms including source documents and strategies are also outlined.
- 7.3. Monitoring indicators relating to environmental matters are extensive and include ones relating to open space standards and provision, the number of sites identified of ecological and nature conservation importance and the extent of enhancements and positive management measures achieved, and the quality and condition of heritage assets. The indicators also encompass the need to identify where valued features such as trees and woodland are being lost and such monitoring will allow the Council to review whether its policies are being implemented and whether the policies themselves or their use needs to be reviewed.
- 7.4. The monitoring proposals and indicators are summarised and expanded upon in section 7 of the Core Strategy.